



South Dublin County Council

Report of County Manager on Submissions received on Draft Development Plan



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PART ONE

Introduction, Legislative Background, Next Steps and Public Consultation Process

1 INTRODUCTION

1.1 Purpose and Contents of Report

- 1.1.1 The purpose of this document is to report on the outcome of the public consultation process carried out in relation to the Draft South Dublin County Development Plan 2010-2016 and to make recommendations on changes to the Draft Plan, as appropriate. The Draft Plan public consultation ran for a ten-week period from 22nd September 2009 to 2nd December 2009. 289 written submissions were received during this period.
- 1.1.2 This report forms part of the statutory procedure for the preparation of a new County Development Plan and is now being submitted to Council Members for their consideration.
- 1.1.3 **PART 1** of the report consists of an introduction, followed by an explanation of the legislative background and requirements for the Manager's Report under the Planning and Development Acts 2000-2006 and a description of the next steps in the process of making the new County Development Plan. This part is completed with a description of the consultation process, an overview of the written submissions received and a list of persons or bodies who made submissions/observations on the Draft Development Plan.
- 1.1.4 **PART 2** consists of a summary and analysis of the issues raised in the written submissions received by the Council. The response of the County Manager to the issues raised is then given, including a recommendation on whether or not a change to the text or maps of the Development Plan is required. Part 2 also includes the Environmental Report.
- 1.1.5 **PART 3** consists of
- a list of bodies consulted
 - summaries of the main issues raised in the submissions/observations on the Draft Development Plan.
 - recommended Changes Draft County Development Plan
- 1.1.6 In Part 2, the issues are analysed and summarised under the theme and chapter headings of the Draft Development Plan, as follows:
- 1.1.7

Introduction and Core Strategy

Theme 1: A Living Place

Housing

Social Inclusion, Community Facilities and Recreation

Sustainable Neighbourhoods

Theme 2: A Connected Place

Transportation

Water Supply and Drainage

Environmental Services

Telecommunications and Energy

Theme 3: A Busy Place

Enterprise and Employment

Town, District and Local Centres

Retail

Theme 4 A Protected Place

Archaeological and Architectural Heritage

Landscape, Natural Heritage and Amenities

Local Zoning Objectives
Specific Local Objectives
Schedules 1-7

Submissions

- 1.1.8 289 written submissions were received during the consultation period. The opinions, views and ideas set out in the submissions related to all aspects of planning. The Council wishes to express its appreciation to those who took the time to make a submission, view the displays or attend the information evenings.

Manager's Report

- 1.3.1 The Planning and Development Act, 2000 requires the County Manager to prepare a 'Manager's Report' on the submissions and observations received, to respond to the issues raised and to make recommendations on the policies to be included in the draft plan. That is the function of this document. The legislation also requires that all of the foregoing must be considered against a backdrop of national policy, guidelines and standards. The Draft Development Plan and Manager's Report (this document) are both available to view on the Council's website www.southdublin.ie along with other information relevant to the process. Copies of the Draft Plan can also be purchased from the Planning Department.

2 LEGISLATIVE BACKGROUND AND REQUIREMENTS

2.1 Planning and Development Act

- 2.1.1 Section 12(4) of the Planning and Development Act, 2000, as amended, requires that not later than 22 weeks after giving notice that a Draft Development Plan has been prepared, a Manager's Report must be produced on any submission/observation received in relation to the Draft Plan and that a report must be submitted to the Members of the Authority for their consideration.
- 2.1.2 Section 12(4)(b) of the Act states that the Manager's Report must:-
- List the persons or bodies who made submission or observations;
 - Summarise the issues raised in the submissions or observations;
 - Give the response of the Manager to the issues raised. In this regard the Manager's response must take into account –
 - Any previous directions of the Members of the Authority under Section 11(4) of the Act
 - The proper planning and sustainable development of the area
 - The statutory obligations of any Local Authority in the area
 - Any relevant policies or objectives of the Government or of any Minister of the GovernmentAnd, if appropriate
 - Protected Structures made by the Minister for Arts, Heritage, Gaeltacht and the Islands under subsection (3)(b)(iv).
 - The Manager's Report and the Draft Plan must then be considered by the Members of the Planning Authority within a period of 12 weeks
- 2.1.3 The Members of the Authority may then accept or amend the Draft Plan, and make the Development Plan accordingly. Should amendments be proposed which would constitute material alterations to the Draft Plan, similar procedures are required as at the Draft Plan stage i.e. notification, a public

display period and submission of a Manager's Report to Members on any submission or observation received on the proposed amendments. Members may then make the Development Plan with or without the proposed amendments or with modifications to the proposed amendments as they consider appropriate

2.1.4 Section 12(11) of the Act states that in making the Development Plan, Members are restricted to considering –

- The proper planning and sustainable development of the area to which the Development Plan relates,
- The statutory obligations of any Local Authority in the area, and
- Any relevant policies or objectives for the time being of the Government or any Minister of the Government.

2.2 Key Stages in Plan Preparation

2.1.5 The table below outlines the key stages in the Development Plan process leading up to the current stage.

Key Stages to Date in Preparation of Draft Development Plan	
Date/Timeframe	Stage
4 th November 2008	Public notice of intention to prepare new plan and review existing plan.
4 th November 2008 - 8 th January 2009	Pre-Draft Public Consultation Period: Public meetings held.
February 2009	Manager's Report prepared on Pre-Draft submissions received. The report summarized the views expressed by individuals and bodies both in written submissions and at the public consultation meetings.
May 2009	Manager's Report adopted by Council and directions given to staff to prepare a Proposed Draft Development Plan.
September 2009	Proposed Draft Development Plan presented to Councillors. Councillors make amendments to Proposed Draft Plan.
22 nd September 2009 - 2 nd December 2009	Draft Development Plan on public display for 10 weeks.
CURRENT STAGE February 2010	Manager prepares Report on submissions/observations received during the Draft Plan consultation period and submits it to Members for their consideration.

2.3 Consideration by Council Members

2.3.1 Council Members have 12 weeks within which to consider this Manager's Report. In order to facilitate this process, a number of briefing meetings have been organised in addition to Special Meetings of Council.

Following consideration of the Draft Development Plan and Manager's Report, Members may then accept the Draft Plan, and make the Development Plan.

Should amendments be proposed which would constitute material alterations

to the Draft Plan, there is a further public display period giving people an opportunity to comment on the proposed amendments only. This is followed by the preparation of a Manager's Report for Members on any submissions or observations received on the proposed amendments.

Members may then make the Development Plan with or without the proposed amendments or with modifications to the proposed amendments as they consider appropriate.

2.3.2 The table below summarises the next steps in the process of preparing the Development Plan, as outlined above.

Next Steps in Process of Preparation of Development Plan	
Date/Timeframe	Stage
CURRENT STAGE February 2010	Manager prepares Report on submissions/observations received during the Draft Plan consultation period and submits it to Members for their consideration.
May 2010	Members consider Draft Plan and Manager's Report within 12 weeks of submission of Manager's Report.
	Members may amend/adopt Draft Plan.
June 2010	If Draft Plan is to be amended, further public notice is given.
Submissions/observations by July 2010	Amendments on display for a period of not less than 4 weeks and submissions/observations invited during that period.
August 2010	Manager prepares report on submissions/observations received and submits it to Members.
14 th September 2010	Members consider Manager's Report within 6 weeks.
	Members make the Plan with or without amendment.
12 th October 2010	Public notice of making a Development Plan (Plan comes into effect 4 weeks from the date it is made).

2.4 Inputs into Preparation of Draft Development Plan

2.4.1 The preparation of the Draft Development Plan involved inputs from a variety of sources, as set out below.

Review of South Dublin County Development Plan 2004-2010

The first stage of the process was to review the existing Development Plan

Mandatory Objectives:

These are set out in the Planning and Development Act, 2000 and include

objectives for the zoning of land; the provision of infrastructure; the conservation and protection of the environment; and the integration of the planning and sustainable development of the area with the social, community and cultural requirements of the area and its population, etc. Other non-mandatory objectives are also referred to in the Planning Act.

Members' Directions

Council Members put down motions setting out their views on various issues which they sought to have incorporated into the Draft Development Plan

Pre-Draft Stage Public Consultation Process:

220 submissions were received during the Pre-Draft stage public consultation process. These were taken into account in the preparation of the Draft Plan.

Background Studies:

Several background studies were carried out which informed the Draft Development Plan. These include

- Housing Land Budget
- Revision of Housing Strategy
- Revision of Record of Protected Structures
- Recommendations in relation to the designation of Architectural Conservation Areas

3 DRAFT PLAN CONSULTATION PROCESS

Description of Consultation Process

3.1.1 The Draft Plan consultation period ran from 22nd September 2009 to 2nd December 2009 inclusive. The consultation process comprised the following elements:-

- A newspaper advertisement was placed in the *Irish Independent* inviting written submissions and setting out where documents were available to view or purchase
- Submissions could be made in writing, by e-mail or on-line
- All of the Draft Development Plan Documents including the written statement, maps and environmental report were on display at County Hall, Tallaght and Clondalkin Civic Offices (they continue to be available in the Tallaght offices).
- The Draft Development Plan documents were also on display in all South Dublin County Council libraries (Ballyroan, Castletymon, Clondalkin, Lucan, Tallaght, Stewart's and Whitechurch)
- The Draft Development Plan written statement and environmental report could be viewed and downloaded from the Council's website (and continues to be available for viewing and downloading).
- The Draft Development Plan maps were available in an interactive format (and continue to be available) on the Council website.
- 29 community centres in the County were provided with posters for display, giving information on where the Draft Plan was available to view and how to make a submission.
- Public information evenings were held in four locations around the County. The dates, times and venues are set out in the table below. These information evenings were also publicised in the newspaper advertisement. During the evenings staff were available to answer

- queries or discuss concerns on a one-to-one basis.
- Letters were sent notifying 60 Prescribed Bodies and South Dublin County Council Elected Members and local TDs and Senators.
- Planning staff were available to deal with Development Plan queries every Tuesday afternoon in the Clondalkin offices and every Wednesday afternoon in the Tallaght offices.
- During the public consultation period, copies of the Plan (written statement including appendices, environmental report and maps) in hard copy or CD were available to purchase from the Planning Counter in the Tallaght offices and in the Clondalkin office. Copies continue to be available for purchase in the Tallaght offices.

Public Information Evenings		
Date	Venue	Time
4/11/09	Clondalkin Civic Offices	6-8pm
11/11/09	Ballyroan Library	6-8pm
18/11/09	Lucan Library	6-8pm
25/11/09	County Library, Tallaght Town Centre	6-8pm

3.2 Written Submissions

3.2.1 289 written submissions were received. The number of submissions highlights the significant level of public interest in the plan-making process. Lists of bodies that were consulted by the Council and persons/bodies that made submissions are all contained in appendices to this report.

3.3 Approach to Consideration of Written Submissions and Results of Public Consultation Meetings

3.3.1 An analysis of the submissions was carried out which involved reading and summarizing every submission and extracting and categorizing all of the issues raised on a database. The submissions were also passed to the appropriate Council Department for comment. Responses to the issues were then drafted, and recommendations were made as to whether or not changes were required to the Draft Plan.

4 OVERVIEW OF ISSUES RAISED IN SUBMISSIONS

4.1 289 written submissions were received, identifying between them 935 issues. The biggest single area of concern was land-use zoning, accounting for more than 17% of issues raised. Most of these related to requests for rezoning, while the remainder mainly comprised general comments on zoning such as objections to the principle of any further zoning, objections or support for individual zonings, etc. Transportation and the core strategy for the County were the next most frequently-raised concerns each accounting for just over 10% of issues raised. The quality-of-life focused themes of the 'A Living Place' section of the Plan including housing, social inclusion, recreation and sustainable neighbourhoods were also of interest to people, constituting just

under 10% of issues raised. Specific Local Objectives generated interest, comprising just over 8% of all issues raised. Other areas of concern included enterprise and employment, telecommunications and energy, and town, district and local centres.

- 4.2 In the following section, a detailed analysis of the submissions is carried out. This includes summaries of issues raised as they relate to the various themes and chapters of the Draft Development Plan, the response of the Manager and recommendations on whether or not any changes should be made to the Draft Plan written statement, maps or Environmental Report.
- 4.3 The responses of the Manager have been framed taking account of the directions of the elected members; the statutory obligations of the local authority; relevant Government guidelines and policies and the proper planning and sustainable development of the County
- 4.4 Recommendations for change to the Draft Development Plan are made in the context of submissions received. It should be noted that further recommendations for amendments to the Draft Development Plan will be brought forward for the meetings of the Council; these will be based on the ongoing work of the Council. Any change to the Draft Development Plan requires the resolution of the Council.

5. List of persons or bodies who made submissions/observations on the Draft Development Plan

Ref	Name
Draft0001	Hazel Lawlor
Draft0002	Oliver McKiernan
Draft0003	Thomas Hogan
Draft0004	Richard Fitzpatrick
Draft0005	Frank Keane Holdings
Draft0006	Melbury Developments Ltd
Draft0007	Octagon Design Limited
Draft0008	National Roads Authority
Draft0009	Jong Kim
Draft0010	Emer Doyle
Draft0011	Andrea Fox
Draft0012	Kieran O'Malley
Draft0013	Ann Styles
Draft0014	Ciara Kellett
Draft0015	John Spain Associates
Draft0016	Oliver Moran
Draft0017	Denis Dunne
Draft0018	Roger Garland
Draft0019	Brian Cullen
Draft0020	John & Patricia Cullen
Draft0021	Pearse Kearns
Draft0022	Martin McNulty
Draft0023	J. Comerford
Draft0024	Philip Stafford
Draft0025	Máire Ford
Draft0026	Eddie Whelan
Draft0027	Martin Hickey
Draft0028	Sean Sheehan
Draft0029	Aidan Gallagher
Draft0030	John Spain Associates
Draft0031	John Spain Associates
Draft0032	Mick Murphy
Draft0033	John J Cross
Draft0034	George & Maureen Haugh
Draft0035	George & Maureen Haugh
Draft0036	Anne McElligott
Draft0037	Orlando Saer
Draft0038	Anne F. Walsh
Draft0039	Noreen Byrne

Ref	Name
Draft0040	John F Forde
Draft0041	Eamonn Smyth
Draft0042	David King
Draft0043	David & Julie Creedon
Draft0044	Anthony McDermott
Draft0045	Brian Meehan & Associates
Draft0046	Adrian Peter Buckley
Draft0047	Pat Slattery
Draft0048	Paul O'Connor
Draft0049	Gareth Pope
Draft0050	Douglas Hyde & Associates
Draft0051	Rory Kunz
Draft0052	Alan McGrath
Draft0053	Alan McGrath EMRA Secretary
Draft0054	David Dempsey
Draft0055	David Dempsey
Draft0056	Ronan Fitzpatrick
Draft0057	Donal Mannion
Draft0058	John Sewell
Draft0059	Sean Sheehan
Draft0060	Simon O'Neill of GT Energy
Draft0061	Deborah Collins
Draft0062	Kathleen Ryan
Draft0063	Paul Gogarty TD
Draft0064	Andrew Clancy
Draft0065	Ronan Fitzpatrick
Draft0066	Rory Kunz
Draft0067	Seana McGearty
Draft0068	Simon Clear
Draft0069	Alan O'Donoghue
Draft0070	Colm Mc Loughlin
Draft0071	Brittas & District Community Association
Draft0072	Don Collopy
Draft0073	Gerard & Dora Cashell
Draft0074	Eileen Doyle
Draft0075	Mary O Callaghan
Draft0076	Frank & Ann Byrne
Draft0077	Mr & Mrs Quinn
Draft0078	Seamus Byrne
Draft0079	Joseph Mulvey
Draft0080	Geraldine Newman
Draft0081	James Hogan
Draft0082	Dolores Morrisson

Ref	Name
Draft0083	Valerie & John Maher
Draft0084	Patrick Hallahan
Draft0085	Dympna & Bernard Conroy
Draft0086	John Mc Fall
Draft0087	David Downes
Draft0088	Pauline Hayden
Draft0089	Larry Murphy
Draft0090	Maura Flynn
Draft0091	Peter Keogh
Draft0092	Frank, Eugene Reynolds Bermingham
Draft0093	Simon / Anthony Clear/ Neville
Draft0094	Ray Sheerin
Draft0095	Amy Powderly
Draft0096	Cathriona & Willie Montgomery
Draft0097	Caroline Nolan
Draft0098	Owen Shinkwin
Draft0099	Kareyn McGarry
Draft0100	Liam Smyth
Draft0101	Cathal O'Toole
Draft0102	Gerard Stockil
Draft0103	Tony Manahan
Draft0104	Tony Manahan
Draft0105	Attracta Ui Bhroin
Draft0106	John Anderson
Draft0107	Patrick McCormack
Draft0108	John Downey On Behalf of Nicola Mellon
Draft0109	John Downey on Behalf of Abbeyrock Technologies Ltd
Draft0110	Vincent Giglione
Draft0111	Declan McCabe
Draft0112	Mary Giglione
Draft0113	Allessandro Gigilone
Draft0114	Paula Dunne
Draft0115	Allessandro Gigilone
Draft0116	Barbara Gigilone
Draft0117	Joesph Byrne
Draft0118	Martin Doran
Draft0119	Trevor Sadler On behalf of Profile Properties
Draft0120	Trevor Sadler on behalf of Bruneuo Developments
Draft0121	McGill Planning On behalf of Profile Properties
Draft0122	Tim Rowe
Draft0123	Sean Hennessy
Draft0124	Tom Phillips & Associates On behalf of Mr Thomas Murphy
Draft0125	Tom Phillips & Associates on behalf of Wellington General Partner Limited

Ref	Name
Draft0126	Mark Johnston - Stephen Little & Associates On behalf of Castlethorn Construction, Fossetts Circus and Mr & Mrs F. Carroll
Draft0127	SIAC COMMERCIAL DEVELOPMENT For and on behalf of Siac Baldonnell Ltd
Draft0128	Garrett Robinson on behalf of SIAC BBP West Ltd
Draft0129	Garrett Robinson On behalf of Siac BBP West Ltd
Draft0130	J O'Connor On behalf od BAncroft Residents Association inc. Main Road and Newtown Park
Draft0131	Beverly Power On behalf of Concerned residents of The Grange, Lucan
Draft0132	Dr David Nolan On behalf of Rockbrook Park School
Draft0133	Brian Meehan & Associates On behalf of Airscape Ltd, Harcourt House, 18/19 Harcourt St., Dublin 2
Draft0134	Brian Meehan & Associates on Behalf of Harry Farrell & Sons, Lands at Tay Lane, Rathcoole
Draft0135	Brian Meehan & Associates On behalf of Mr Myles Balfe, The Whin, Colmanstown, Rathcoole, Co.Dublin
Draft0136	Brian Meehan & Associates on behalf of Lidl Ireland GmbH, Ballyfermot Road, Ballyfermot, Dublin 10
Draft0137	Justin Byrne on behalf of Lucan Planning Council
Draft0138	Justin Byrne on behalf of Liffey Valley Part Alliance
Draft0139	Tara De Buitlear on behalf of Pineview & Churchgrove Env Group
Draft0140	Brian Meehan & Associates on behalf of Lidl Ireland GmbH
Draft0141	Brian Meehan & Associates on behalf of Lidl Ireland GmbH relating to lands at Fortunestown Lane, Tallaght, D24
Draft0142	Brian Meehan & Associates Ltd on behalf of Lidl Ireland Ltd relating to Lands at Greenhills Road, Walkinstown, Dublin 12
Draft0143	Lorna Nolan
Draft0144	Justin Byrne on behalf of Lucan Planning Council
Draft0145	Darern Quaille of Simon Clear Consultants on behalf of Stamp Investments
Draft0146	Darren Quaille of Simon Clear Consultants of behalf of Concast Holdings
Draft0147	Brian Wylie, Senior Transportation Planner on behalf of Iarnrod Eireann
Draft0148	Tara De Buitlear on behalf of TRCU
Draft0149	Brendan Boyle
Draft0150	Liam Smyth
Draft0151	Aine Ryan, Declan Brassil on behalf of John Ronan & Sons of Dudley Hills
Draft0152	Aine Ryen & Declan Brassil on behalf of John Ronan & sons
Draft0153	Aine Ryan & Declan Brassil on behalf of John Ryan & Sons relating to nursing home uses
Draft0154	Deborah Collins on behalf of Joan Curran, Rathcoole Community Council
Draft0155	Kieran O'Malley on behalf of John Smith Snr

Ref	Name
Draft0156	Ben Morrell on behalf of vodafone ltd
Draft0157	David Rowe on behalf of South Dublin Assoc of An Taisce
Draft0158	Padraig Macoitir on behalf of South dublin Conservation Society
Draft0159	Helen Cahillane on behalf of Eircom
Draft0160	Stephen Little on behalf of executors of the late Brigid Byrne
Draft0161	David O'Flynn on behalf of Ecocem Ire Ltd
Draft0162	Darran Quaille, Simon Clear Consultants on behalf of Bymac Project Managers
Draft0163	Stephanie Dillon
Draft0164	Finola McDonald
Draft0165	Aine Ryan
Draft0166	Declan Brassil
Draft0167	Tony Manahan
Draft0168	Darran Quaille Simon Clear Consultants
Draft0169	Darran Quaille Simon Clear Consultants
Draft0170	Stephanie Dillon John Spain & Associates
Draft0171	Marcus Gilhowley Stephen Little & Associates
Draft0172	Helen Cherry
Draft0173	Garrett Robinson Siac (Clondalkin), Ltd
Draft0174	Sarah Waddell Site Acquisition & PR Manager, Meteor Mobile Communications Ltd
Draft0175	Niall A Melvin Melvin Properties Ltd
Draft0176	Gregory O'Toole
Draft0177	A Carthy
Draft0178	Christoper O'Donnell
Draft0179	Rita Murphy
Draft0180	D O'Neill
Draft0181	Oonagh & Enda O'toole
Draft0182	Myra Sharkey
Draft0183	James Cummins
Draft0184	Mr R & Mrs M Goldwater
Draft0185	Aidan & Pauline Thomas
Draft0186	Gerry O'Toole
Draft0187	Christopher O'Donnell
Draft0188	Pauline Madden
Draft0189	Brian & Joan Newell
Draft0190	John Spain & Associates on behalf of Sean McElvaney
Draft0191	John Spain & Associates on behalf of Precinct Developments
Draft0192	John Spain & Associates On behalf of Cookstown Development Partnership
Draft0193	John Spain & Associates on behalf of Peamount
Draft0194	Mary Smyth
Draft0195	Joseph Scully
Draft0196	Patrick Leonard

Ref	Name
Draft0197	Fenton Simons Associates on behalf of Maplewood
Draft0198	Fenton Simons Associates on behalf of Maplewood
Draft0199	Fenton Simons Associates on behalf of Maplewood
Draft0200	Fenton Simons Associates on behalf of Citywest Ltd
Draft0201	Fenton Simons Associates on behalf of Davy Hickey Properties
Draft0202	Helen Cahillane
Draft0203	RKD Architects on behalf of Microsoft Operations Ireland Ltd
Draft0204	Integrated Developments Services Ltd on behalf of Robert Roberts LTd
Draft0205	Integrated Developments Services Ltd on behalf of PKB Partnership
Draft0206	Peter Cagney & Associates Ltd on behalf of Larnwood Ltd
Draft0207	Integrated Development Services Ltd on behalf of the owners of a premises on Airton Road
Draft0208	Jim Lawlor, Hon Secretary
Draft0209	Terry & O'Flanagan Consulting Engineers on behalf of Kevin Cooke
Draft0210	Grainne Mallon & Associates on behalf of Maurice Joyce & Tanya Patterson, Lucan Lodge Nursing home
Draft0211	Christina Reilly
Draft0212	Seamus Tutty
Draft0213	John Spain & Associates on behalf of Dublin City Sports & Social Club
Draft0214	Ciaran Kelly on behalf of St. Finians GAA Club
Draft0215	Kiaran O'Malley & Co Ltd on behalf of Cavan Developments
Draft0216	RPS Planning & Environment on behalf of Sandymark Construction Ltd
Draft0217	RPS Planning & Environment on behalf of Lamberton Properties
Draft0218	David Byrne Department of Defence
Draft0219	Darran Quaille of Simon Clear P&D Consultants on behalf of HSS Developments
Draft0220	Darran Quaille of Simon Clear P & E Consultants on Behalf of HSS Developments - Finnstown House
Draft0221	Darran Quaille of Simon Clear P & E Consultants on behalf of HSS Developments - Retirement Village
Draft0222	David Smith of John Spain & Associates on behalf of Dublin City Services Sports & Social Club
Draft0223	Darran Quaille of Simon Clear P & E Consultants on behalf of HSS Developments - Golf Village
Draft0224	Darran Quaille of Simon Clear P & E Consultants on behalf of HSS Developments - Lakes Golf Course
Draft0225	Sorcha Turnbull of Treasury Holdings on behalf of Clonburris
Draft0226	Darren Quaille of Simon Clear P & E Consultants on behalf of HSS Developments - Westpark
Draft0227	Darran Quaille of Simon Clear P & E Consultants on behalf of Freshcape Developments Whitechurch Road
Draft0228	Paul Turley of John Spain & Associates on behalf of Séan McElvaney

Ref	Name
Draft0229	Robert Keran of John Spain & Associates on behalf of Peamount, Newcastle Road
Draft0230	Darren Quaille of Simon Clear P & E Consultants of Simon Clear P & E Consultants
Draft0231	David Nolan
Draft0232	Julie Costello of Tom Phillips and associates
Draft0233	Louise Wildenboer on behalf of Eirgrid PLC
Draft0234	Louis Wildenboer on behalf of Eirgrid PLC
Draft0235	Darran Quaille of Simon Clear P & E Consultants on behalf of Swiftbrook Conservation Ltd
Draft0236	John Kehoe of Brady Shipman Martin on behalf of Tudor Homes
Draft0237	Jeanette Mair on behalf of Construction Industry Federation / IHBA
Draft0238	John Kehoe of Brady Shipman Martin on behalf of O'Flynn Construction & Tudor Homes
Draft0239	Sarah Waddell of Meteor Mobile Communications
Draft0240	Ann Murphy
Draft0241	Darran Quaille of Simon Clear P & E Consult on behalf of Weston Ltd
Draft0242	Darran Quail of Slmon Clear P & E Consult on behalf of HSS Developments - Tassagart Gardens
Draft0243	Jong Kim of Masterplan Assoc on behalf of Bohernabreena/Glenasmole/Ballinascorney Res Planning Group
Draft0244	Peter Byrne of South Dublin Chambers
Draft0245	Cllr Trevor Gilligan
Draft0246	Emer Condon of Irish Cellular Industry Association
Draft0247	Trevor Sadler on behalf of Profile Properties - Lands at Kilbride
Draft0248	Morgan Burke
Draft0249	Julie Costello of Tom Phillips & Associates on behalf of Storeford Ltd
Draft0250	Darragh McGonigle
Draft0251	Trevor Sadler on behalf of Profile Properties - Lands at Profile Park
Draft0252	Jong Kim of Masterplan Associates on behalf of Liz MvEvoy
Draft0253	Stephanie Dillon on behalf of Spain Courtney Doyle
Draft0254	Cian O'Mahony
Draft0255	An Taisce
Draft0256	Pat Hanlon
Draft0257	Gretta Hannigan
Draft0258	Angela O'Donoghue Vice Chair of Glendoher & District Residents Association
Draft0259	Eddie Whelan
Draft0260	Frank O'Sullivan on behalf of Percam Ltd
Draft0261	Joe Bonner on behalf of R Mockler
Draft0262	Darran Quale on behalf of HSS Developments - Citywest
Draft0263	Patrick Brannigan

Ref	Name
Draft0264	Marie Keely
Draft0265	Terence Mangan
Draft0266	Edward Kellett
Draft0267	Joseph Moran
Draft0268	James Dillon
Draft0269	Michael Kelly
Draft0270	Anthony Greene
Draft0271	Brian Brophy
Draft0272	Mary and Dermot McDonagh
Draft0273	Maurice & Pauline Kavanagh - Mills
Draft0274	Mark Kelly
Draft0275	A Geoghegan
Draft0276	G Matthews
Draft0277	Judith Daly
Draft0278	Grace O'Connell
Draft0279	Martin Murphy
Draft0280	Fiona Ennis
Draft0281	Senator Frances Fitzgerald
Draft0282	Clare Connolly
Draft0283	Brian Kenny
Draft0284	Andy Lane
Draft0285	Alice Doherty
Draft0286	Ivan Allen
Draft0287	Mark Feeney
Draft0288	Declan Hanley
Draft0289	Warren Whitney

PART TWO

Summary and analysis of the issues raised in the written submissions received by the Council

6.1 Manager's Response to the Minister of Environment, Heritage and Local Government Submission

Issue	Sub No	Manager's Response and Recommendations
<p>The Department is of the view that the draft Development Plan is well structured, clearly written, deals competently with a wide variety of planning issues and adequately incorporates national guidelines, the current Greater Dublin Area Regional Planning Guidelines (GDA RPGs) and the Retail Strategy for the GDA (2008-16).</p> <p>The draft GDA RPGs 2010-16 will allocate the 2016 population target to the municipalities in the GDA and will also set out housing allocations on a municipal basis. These population and housing allocations will need to be incorporated into the Development Plan.</p> <p>The Core Strategy in the draft plan would not meet the specific requirements set out in the Planning and Development (Amendments) Bill 2009. The council could give consideration through material amendments to aligning the Core Strategy in the draft plan with the Core Strategy requirements set out in the new Act, or if this is not possible by way of a variation of the plan.</p> <p>Depending on the timetable for the Development Plan and the date of publication of the draft GDA RPGs, the Council may wish to consider incorporating aspects from the draft RPGs (e.g. population and housing allocations) as material amendments to the draft DP.</p>	<p>0164 0283</p>	<p>Manager's Response</p> <p>The comments of the Minister are noted. It is proposed to alter the format of the core strategy to include the population figures as set out in the Draft Regional Planning Guidelines for the Greater Dublin Area, and to refer to the retail hierarchy as set out in the Draft Development Plan which reflects the policies of the Retail Strategy for the GDA. It is also proposed to refer to the built area of South Dublin County Council as an important part of the Dublin Gateway as defined by the National Spatial Strategy.</p> <p>It is further recommended that a schematic drawing of the core strategy be included in the amended Draft Development Plan. This will give a spatial expression to the core strategy and bring the Draft Development Plan into line with the requirements of the DoEHLG. In making the above recommended changes it is proposed that the core strategy will include all relevant information as set out in the Planning and Development (Amendments) Bill 2009 while reflecting the spatial layout of the County.</p> <p>Manager's Recommendation</p> <p>That the core strategy be altered to include:</p> <ul style="list-style-type: none"> • the population figures as set out in the Draft Regional Planning Guidelines for the Greater Dublin Area; • reference to the retail hierarchy as set out in the Draft Development Plan; • reference to the built area of South Dublin County Council being an important part of the Dublin Gateway as defined by the National Spatial Strategy; • a schematic drawing of the core strategy.

<p>If it is not possible to make the adjustments, or if the adopted RPGs differ significantly from the draft RPGs, the requirement in the new Act would make it necessary to incorporate the relevant aspects of the adopted RPGs into the development plan by way of a lan variation.</p>		
<p>Bat species are protected under both National and EU law and the policy relating to lighting of key buildings and the Liffey Bridge within the Plan for Lucan has the potential to impact adversely on bat species where they are present.</p>	<p>0164 0283</p>	<p>Manager's Response Comment Noted.</p> <p>Manager's Recommendation Insert additional text to SLO7 Lucan- Lighting of Key Buildings as follows; The design of any proposed future lighting of the Liffey Bridge shall be subject to assessment of the impact of such lighting on bat roosting, hunting and movements.</p>
<p>Care should be taken to ensure that the provision of amenities such as footpaths to give access to waterways or located in pNHAs do not result in adverse impacts on protected flora, fauna or habitats or detract from the scientific interest of designated sites.</p>	<p>0164 0283</p>	<p>Manager's Response Policy LHA 21: (4.3.7.xix) Watercourses indicates that the promotion of access, walkways and other recreational uses on public open space alongside watercourses will be subject to defined strategies of nature conservation. Policy LHA 22: (4.3.7.xx) Protection of the Grand Canal indicates that it is policy to enhance the visual, recreational, environmental and amenity value of the Grand Canal, and furthermore states that all developments adjoining the Grand Canal should be accompanied by a Biodiversity Action Plan. Both the Liffey and Slade Valleys are pNHAs. Policy LHA8 (4.3.7.vi), Special Areas of Conservation and proposed Natural Heritage Areas, notes that it is policy to protect and preserve these area, while also noting that such places may be damaged by recreational overuse. It is considered that any amenity development in either Slade or Liffey Valleys would be required to be in compliance with relevant policies on the protection of pNHAs.</p> <p>Manager's Recommendations No change recommended.</p>
<p>When considering the provision of facilities in the</p>	<p>0164</p>	<p>Manager's Response</p>

<p>Liffey Valley or Slade of Saggart, care should be taken to ensure that such amenities do not detract from the scientific interest of the sites.</p>	<p>0283</p>	<p>Comment noted.</p> <p>Manager's Recommendations No change recommended.</p>
<p>With regard to the objective to examine the possibility of designating a highland area of the county as being suitable for the production of wind energy, it is recommended that the Departmental Guidelines and compliance thereto are referred to in the Plan. In addition such a designation would be subject to appropriate assessment screening and if necessary appropriate assessment.</p>	<p>0164 0283</p>	<p>Manager's Response Reference to the Wind Energy Development Guidelines for Planning Authorities (2006) is included in Sections 2.5.9 (Renewable Energy) and 2.5.11 (Wind Energy) of the Draft Plan. Policy LHA9 (Section 4.3.7.vii) addresses the requirement for appropriate assessment of relevant projects.</p> <p>Manager's Recommendation No change recommended.</p>
<p>The long term road proposal indicated on the maps to cross the Liffey Valley pNHA is of concern, as the pNHA is a wildlife corridor and an important site for biodiversity including protected species and rare plants. This long term road proposal also crosses the Grand Canal and has the potential to impact on two watercourses which are important wildlife corridors. They are likely to contain otters and bats which are listed on Annexe IV of the Habitats Directive, and this issue should be assessed in the SEA.</p>	<p>0164 0283</p>	<p>Manager's Response The alignment of the road was raised in the scoping submission by the DoEHLG. Taking into account the submission, the sensitivities contained therein and the potential for significant negative impact of the western road on receiving environments, mitigation in the form of SLO 33 was required to be inserted into the Draft Development Plan. This SLO requires that the road shall be subject to a sustainability assessment in order to ascertain the need for the project, and in the event of the road being approved by the sustainability assessment, an EIA requiring full examination of alternative alignments will be required, with particular attention to be paid to potential for impact upon the Grand Canal. It is considered that these mitigation measures will ensure that the need for the road would first be required to be established, while any road alignment would be carefully considered for environmental impacts on habitats and species in addition to landscape and other impacts.</p> <p>Manager's Recommendation No change recommended.</p>
<p>The boundaries of the SAC and pNHA areas should be checked with the NPWS prior to finalising the plan as boundaries can change from</p>	<p>0164 0283</p>	<p>Manager's Response. It is agreed to recheck the boundaries of the SAC and pNHA, the Council is confident that the mapping of SACs and pNHA areas are correct.</p>

<p>time to time.</p>		<p>Manager's Recommendation Recheck boundaries of SAC and pNHA.</p>
<p>Under section 2.3.1.2 of the Appropriate Assessment Screening, the Department welcomes the intention to protect feeding areas of greylag geese that roost on the Poulaphouca Reservoir SPA by subjecting proposed developments in this area to impact assessment. However, there does not appear to be any cross-reference to this in section 3 of the Plan.</p> <p>There appears to be no mention of species protected under National Law, apart from protecting their habitats and wildlife corridors where possible (Policy LAH19). It is important to note that such species are protected wherever they occur and not just in designated sites or wildlife corridors. It is recommended that mention be made of protected flora and fauna under National as well as EU law.</p>	<p>0164 0283</p>	<p>Manager's Response The manager accepts that there is no direct cross-reference with the intention in the Appropriate Assessment to protect feeding areas of greylag geese that roost on the Poulaphouca Reservoir SPA with section 3 of the Plan.</p> <p>Policy LHA19 (4.3.7.xvii) Flora and Fauna notes that it is Council policy to protect natural resources within the County and to conserve the existing wide range of flora and fauna in the County through the protection of wildlife habitats and corridors wherever possible. Additionally, it is proposed to strengthen this policy through noting the need to protect nationally protected species.</p> <p>The Draft Plan includes provision for the screening of Natura 2000 sites (4.3.7.vii, final paragraph) The reference to any proposed amendments/variations to the Plan are acknowledged.</p> <p>Manager's Recommendation Insert in the explanatory text for Policy LHA19 Flora and Fauna:- 'In conjunction with the National Parks and Wildlife Service, the Council will require impact assessment of proposed development in Brittas and Aghfarrell on the feeding areas of protected Greylag Geese'</p> <p>'The Council will help ensure that any E.U and Nationally protected species are not place under further risk of reduction in population size.'</p> <p>Add to Section 4.3.7 vii: The Council will fulfil the requirements of the National Parks and Wildlife Service <i>Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities</i> (December 2009) for projects and plans.</p>
<p>It is noted that the screening report templates provided for by the European Commission in their</p>	<p>0164 0283</p>	<p>Manager's Response The Appropriate Assessment Screening was undertaken using a template arising</p>

<p>guidance document on Appropriate Assessment have not been used, and that these are useful to ensure all the necessary impacts are covered.</p>		<p>from a Heritage Training seminar on 26th February 2009 attended by NPWS. Following the subsequent production in December 2009 of the NPWS's detailed guidance document on Appropriate Assessment, the SDCC Screening document was reassessed and no amendments to the outcome of the screening process are deemed to be necessary.</p> <p>Manager's Recommendation No change recommended.</p>
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6.2 Introduction and Core Strategy

Issue	Sub No	Manager's Response and Recommendations
0.1 Introduction		
<p>An Garda Siochana welcomes the Draft Plan and Looks forward to a good working relationship with South Dublin County Council.</p> <p>Regard the Plan as an excellent document and trust that it will give definite shape to the county in the future.</p> <p>Overall, An Taisce welcomes the publication of the Draft Development Plan and the policies and objectives included therein. We consider that the Draft Development Plan represents a significant step in the creation of a sustainable society and an economy which operates within the carrying capacity of the earth's resources and ecosystem services and the capacity of the earth to absorb anthropogenic pollution.</p> <p>Concern regarding the standard of mapping and access to information at the Civic Offices Clondalkin.</p> <p>The Draft Development Plan should be amended to include a specific new section entitled 'Implementation & Monitoring'</p> <p>Suggest the following amendments be made to the layout and format of the Plan document: • All paragraphs should be numbered and lettered as in</p>	<p>0040 0157 0196 0255 0159 0255 0018 0232 0105 0137 0138 0144 0138 0137</p>	<p>Manager's Response</p> <p>The submissions of support for the Draft Development Plan are noted. In the final adopted plan an index will be included and a set of A3 maps will formatted, in the interests of clarity. It was not possible for the draft or amended draft to include these items due to the stringent legislative timelines and consequent tight production deadlines. With respect to the wording of the plan the use of words such as 'have regard to', objective and strategy is clearly established and no change is required. Careful consideration has been given to the layout of the Draft Development Plan. It is recognised that the structure of the draft Development Plan differs from that of the current plan. However the grouping of similar policy areas in theme areas was considered more appropriate for the plan to be considered in a more holistic way, further allowing for a clear alignment to be made between policy, objective and development management criteria. The need to include a core strategy also requires a change in format. While the grouping of the Plan into the four theme areas allows for alignment with other Council policy documents, in particular the County Development Board Strategy.</p> <p>With respect to matters pertaining to financial charges these are not considered to be Development Plan matters.</p> <p>Manager's Recommendation</p> <p>No Change recommended- Index will be included in final adopted document.</p>

<p>the 2004 Plan. • An index should be provided. • The phrase 'have regard to' should be omitted from the Plan as 'its usages' has been described as meaningless in the High Court. (McEvoy & Smith 2001/359 JRI). The phrase should be substituted by phrases such as: shall, as far as is practical, be consistent with.</p> <p>Seeks the inclusion of an index and a bound set of A3 maps of the draft plan.</p> <p>Terms such as strategy, objective, have regard to are meaningless as used- should be transposed as definite terms e.g. Polices, or with definite timeframes or Critical Success Factors.</p> <p>Believe that charging the public for access to information or to make observations or submissions is a barrier to public participation in the planning process. We submit that a policy should be included in the CDP to waive the charge (or charge a nominal fee of 1 Euro) for any FOI request or for any submission on a planning application. It is within the Council's powers to waive fees.</p>		
<p>0.2 Core Strategy</p>		

<p>The Council must ensure that the plan is consistent with national policies of proper planning and sustainable development and reflective of national and regional guiding principles</p> <p>Include an overall Vision Statement recognising that social and economic well-being are intrinsically linked to the protection of the environment and committing to the future development South Dublin in accordance with the principles of sustainable development whereby natural resources and environmental conditions which are fundamental to the economic progress and social well being of society.</p> <p>Include a new objective as follows: 'The Planning Authority is committed through the implementation of the policies and objectives of this Development plan and subsequent development plans to transform South Dublin into a low-carbon society and to increase local energy security and resilience. It is therefore an overarching objective of this Development Plan to achieve a reduction of greenhouse gases of at least 20% below 1990 levels and an increase in energy efficiency of at least 20% by 2020 in accordance with. The Planning Authority is committed to exceeding these targets in accordance with Ireland's agreed international commitments as set out in the EU "Climate Action and Renewable Energy Package" of January 2008'.</p> <p>The Core Strategy in the draft plan would not meet the specific requirements set out in the Planning and Development (Amendments) Bill 2009. The council could give consideration through material</p>	<p>0283 0255 0257 0098 0254 0245 0137 0138 0042 0147 0237 0281 0254 0216 0244</p>	<p>Manager's Response</p> <p>The comments of the Minister are noted. It is proposed to alter the format of the core strategy to include the population figures as set out in the Draft Regional Planning Guidelines for the Greater Dublin Area, and to refer to the retail hierarchy as set out in the Draft Development Plan which reflects the policies of the Retail Strategy for the GDA. It is also proposed to refer to the built area of South Dublin County Council as an important part of the Dublin Gateway as defined by the National Spatial Strategy.</p> <p>It is further recommended that a schematic drawing of the core strategy be included in the amended Draft Development Plan. This will give a spatial expression to the core strategy and bring the Draft Development Plan into line with the requirements of the DoEHLG. In making the above recommended changes it is proposed that the core strategy will include all relevant information as set out in the Planning and Development (Amendments) Bill 2009 while reflecting the spatial layout of the County.</p> <p>It is further recommended that a schematic drawing of the core strategy be included in the amended Draft Development plan. This will give a spatial expression to the core strategy and bring the Draft Development Plan into line with the requirements of the DoEHLG. In making the above recommended changes it is proposed that the core strategy will include all relevant information as set out in the Planning and Development (Amendments) Bill 2009 while reflecting the spatial layout of the County.</p> <p>The Draft Regional Planning Guidelines for the Greater Dublin Area 2010-2022 refer to <i>'the excess of housing stock not currently occupied'</i> and predict that <i>'the current market conditions of over supply will extend into the coming years'</i>. The residential strategy contained in the core strategy must be viewed against the realities of this strategic economic backdrop.</p> <p>The Draft Development Plan figure of 627 hectares queried in the submission is based on lands available specifically for residential development. However, there is also capacity for residential development in locations such as Tallaght Town Centre and Enterprise Priority One areas where the land use zoning provides for various uses including residential. These areas could potentially yield 8,000 units, based on modelled capacity, above that which may come from the 627ha.</p>
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<p>amendments to aligning the Core Strategy in the draft plan with the Core Strategy requirements set out in the new Act, or if this is not possible by way of a variation of the plan.</p> <p>Recommend to the Planning Authority that it would be prudent to ensure that the Draft Development Plan, in so far as is possible, follows the methodology for the 'Core Strategy' in the Planning & Development (Amendment) Bill 2009</p> <p>The National Sustainable Development Strategy should form the basis for the planned strategies within the plan.</p> <p>The 2016 population targets and housing allocations for the county set out in the draft GDA RPG will need to be incorporated into the development plan.</p> <p>A mechanism for the implementation of sequential development is required within the main body of the document. Future growth projections must accurately and adequately inform the final draft development plan.</p> <p>The Plan should ensure the adequacy of the existing water supply/wastewater treatment facilities are assessed where zoning/rezoning of lands and the introduction of new development is being proposed. This should address both capacity and performance and the potential risk to human health, water quality and water quantity.</p> <p>The Council must commit to the servicing of zoned lands and the provision of key infrastructure</p>	<p>With respect to the 627ha the Draft County Development Plan has calculated residential capacity based on a figure of 44 units per hectare. This has been the historical average yield in the County and this is a figure below which it is not desirable to go, in the interests of sustainability and allows for a conservative capacity yield to be established reflecting the current economic uncertainty.</p> <p>With respect to the contention that the figure for the number of dwelling units that can be accommodated on existing zoned residential land (35,000) conflicts with the figure provided by the Council in the Draft Development Plan Issues Paper (40,500). The latter figure was a provisional estimate arrived at during an embryonic stage in the Development Plan process. In the interim, certain lands have been utilised and the negative economic climate has become more entrenched. Having regard to these factors and following more detailed analysis, the former figure was put forward as a more accurate representation of the likely numbers of units.</p> <p>Taking into account all of the relevant factors, the Council is satisfied that there is sufficient capacity for planned and serviced zoned land to meet RPG requirements to 2016 and beyond and give sufficient headroom in a variety of areas of the County to allow residential development to proceed in a structured and sustainable manner.</p> <p>Notwithstanding the above the Plan is clear in articulating a comprehensive strategy that seeks to establish a built environment that will be sustainable in the medium/long term while offering choice and opportunity to existing and future residents of the County. Improved mobility by non-private car use is key to this. The strategy of the future development of this county is based on fixed rail based transport solutions. This strategic approach should be viewed in the context of reducing energy demands for new housing; the greening of power supply and the medium term changes in economic development towards a more services based working environment with a consequent more 'urbanised' effect on the built environment. The development plan is supportive of renewable energy that will support the built environment that is more compact, connected and well serviced. It is the view of the manager that the Development Plan Strategy takes a holistic and integrated view of the future development of the County.</p> <p>With respect to any 'down zoning' it is the view of the Manager that while no further</p>
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<p>projects to ensure that a shortfall of serviced, zoned, and ready to go lands does not occur during the lifetime of the new plan. Consideration should also be given to zoning lands which are serviced or could be readily serviced during the life of the new plan.</p> <p>The adopted development plan must commit to the list of projects funded under the relevant Development Contribution Scheme, their programme status, amount of funding spent and target completion dates for each project should be published by the Council annually within three months of close of the financial year. It is suggested that the rate of development contributions in 2009 should be reduced by up to 40%</p> <p>Ensure all local authority owned available lands can be brought through to the development process within the lifetime of the development plan.</p> <p>Request that the manager de-zone 10% of all land zoned residential in the county and in council ownership.</p> <p>If it becomes necessary or desirable to rezone land we believe that the case in favour of this should be so strong that a Material Variation to the plan will not be opposed. A Material Variation should be the only method used to zone land over the life of this plan.</p> <p>RPA broadly supportive of land use and transportation strategy in the Draft.</p>		<p>lands are required at present to meet projected demands, this is in the context of existing zoned lands being retained. This will allow for a range of opportunities for housing our population in a sustainable fashion. The down zoning of land in the absence of an overall clear structure would be contrary to the proper planning and sustainable development of the County.</p> <p>No new lands are proposed to be zoned and all zoned lands are serviced. The manager is satisfied that given projected demands there are sufficient services to accommodate development on these lands.</p> <p>The Plan gives clear guidance and clearly articulates the form of development that this Council supports. The Council has always been supportive of investment and employment opportunities insofar as they do not result in the undermining of the core Development Plan Strategy.</p> <p>The Plan sets out a comprehensive view on guiding the development of the County. Given the complexity of the Plan and the statutory timelines PEST or SWOT would not be considered appropriate. However, the Manager will consider for future Development Plans if there are other forms of strategic planning tools which may be adopted for the Development Plan. It should be noted that this plan has been subjected to a comprehensive SEA which does act in same way as SWOT. Development contributions are separate to the Plan. While the capital programme is a function of the Council's annual budget deliberations.</p> <p>Manager's Recommendation That the core strategy be altered to include;</p> <ul style="list-style-type: none"> • the population figures as set out in the Draft Regional Planning Guidelines for the Greater Dublin Area • reference to the retail hierarchy in the Draft Development Plan • reference to the built area of South Dublin County Council being an important part of the Dublin Gateway as defined by the National Spatial Strategy. • Include a schematic drawing of the core strategy.
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<p>IE very much welcomes the positive support of SDCC in the Draft CDP for the various rail initiatives included under the T21 transport investment programme which will greatly benefit public transport accessibility within the County.</p> <p>The CIF/IHBA supports the objective to assist in maintaining and guiding population growth in South County, in particular surrounding urban centres, and welcomes the Council's policy for promoting the consolidation of existing built-up areas by facilitating quality infill development.</p> <p>The Development Plan should focus on improving the urban experience in key service and district centres across the County area</p> <p>SWOT and PEST analyses should be carried out across Council departments prior to final adoption of the new development plan so that allocation of responsibilities for implementation of strategic policies is established from the outset.</p> <p>Ensure privately funded development opportunities, which generate investment and employment on development lands are supported by the Council in the new development plan, particularly given the financial constraints facing many private investors now and into the medium term</p> <p>Enhance communication links between key stakeholders within the County to stimulate the sharing of best practice and innovative approaches.</p>		
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<p>Urges the Council to be conscious of the need to sustain and develop local employment.</p> <p>The Plan should promote specific Policies/Objectives and associated provisions for the development and promotion of appropriate climate change adaptation and mitigation measures that can be implemented through relevant land use plans and/or specific plans e.g. Flood Risk Management Plans, etc.</p> <p>The Plan should promote the inclusion of specific Policies which promote the integration of the implications of Climate Change at a local level, in land use planning within the Plan area. In particular the Plan should refer to Ireland's National Climate Strategy 2007 – 2012.</p> <p>The Plan should also address how climate change might impact on the implementation of land use plans in the Plan area, and in particular to the potential impact of climate change on “ increased risk of flooding ” and possible “increased occurrence of drought conditions”</p> <p>The Plan should promote the appropriate zoning of lands and restriction of use in areas liable to flooding to avoid increased risk of flooding of the lands either within or adjoining the zoned areas. A specific Policy should be included to provide for/promote appropriate flood risk assessments to be undertaken of development proposals in such areas.</p> <p>Any future development, zoning / rezoning within</p>		
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<p>the Plan area should ensure the findings of the Flood Risk Assessment Management Studies are taken into consideration prior to authorisation being granted.</p> <p>Consideration should be given to the inclusion in the Plan, as appropriate, of a Policy/Objective in relation to the preparation and implementation of "An Energy Conservation Strategy" and associated awareness campaign within the Plan area. Specific timescales should be assigned to the preparation of such a strategy.</p> <p>0.2.1 A Living Place The County's Land Use planning strategy is focused primarily on the energy benefits of increasing public transport, while paying little attention to the energy benefits of sustainable power and heat generation. Request that this policy should include provision for medium to long term residential development on sites with confirmed geothermal energy potential, such as at Newcastle.</p> <p>Request that the statement in Section 0.2.5 – Core Strategy that the private car is the biggest contributor to green house gas emissions be changed as it is factually incorrect, and that this section cannot conclude that the consolidation of the urban form will have an effect on commuting behaviour in light of travel pattern statistics from Adamstown.</p>		
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<p>0.4.4 Environmental Impact Assessment</p> <p>There is no reference in the Plan to the findings of the SEA or the AA screening process. Consideration should be given to including the following in the Plan: - A table to summarise the key findings of the SEA process - A summary description of the integration of the parallel processes of Plan preparation, Appropriate Assessment and Strategic Environmental Assessment. - A description of how the development of the preferred Plan Alternative has influenced the development of the Draft Plan itself. - Consideration should be given to the inclusion of a specific Policy/Objective in the Plan to ensure full compliance, with the requirements of Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment – The SEA Directive and the associated Planning and Development (Strategic Environmental Assessment) Regulations, 2004. - The Plan should promote the development and implementation of Procedures to ensure compliance with the requirements of the SEA Directive and related SEA Regulations for all Land Use Plans within the Plan area. - The Plan should include relevant Policies and Objectives are included, to address, where appropriate, the “Main Environmental Challenges” for Ireland as set out in Chapter 16 – “Main Environmental Challenges” of EPA Ireland’s Environment 2008 (EPA, October 2008).</p>	<p>Draft0254</p>	<p>Manager’s Response Acknowledged. It is recommended that an expanded section in relation to these aspects be included in the Development Plan. See final recommendation in Recommendations.</p> <p>Manager’s Recommendation Alter heading of Section 0.4.4 from “Environmental Impact Assessment” to “Environmental Assessment”, introduce “Environmental Impact Assessment” as Section 0.4.4.1 and “Strategic Environmental Assessment”, as Section 0.4.4.2</p> <p>Section 0.4.4.2: Strategic Environmental Assessment The Council is committed to ensure full compliance with the SEA Directive (Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment) as transposed into Irish Law through the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (SI No. 436 of 2004).</p>
<p>Do not believe that the SEA conducted meets with the statutory requirements and will need to be substantially revisited before the process can be successfully concluded legally</p>	<p>0105 0137 0138 0144</p>	<p>Manager’s Response The SEA Environmental Report complies with the requirements of the SEA Directive (Directive 2001/42/EC of the European Parliament and of the Council of Ministers, of 27 June 2001, on the assessment of the effects of certain plans and programmes on the environment) as transposed into Irish Law through the European Communities</p>

		<p>(Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (Statutory Instrument Number (SI No.) 435 of 2004) and the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (SI No. 436 of 2004).</p> <p>The Strategic Environmental Assessment of the Draft Plan was undertaken in tandem with the Development Plan process. The Implementation of SEA Directive document published by the Department of the Environment, Heritage and Local Government (DoEHLG) was consulted extensively as were the required statutory bodies. None of the submissions from the statutory bodies, specifically the EPA or DoEHLG, noted any irregularities regarding the Strategic Environmental Assessment.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Disagree with the position that appropriate assessment does not require a stage 2 assessment – formal request for such and screening matrix to be made available – legislatively required</p>	<p>0105</p>	<p>Manager's Response The Habitat Directive requires an initial Screening Study to establish whether or not a full Stage 2 Appropriate Assessment is necessary. The results of this screening concluded that the second stage was not required. The Screening Matrix and Report have been available on the Council website from the time that the Draft Development Plan was put on public display.</p> <p>Manager's Recommendation No change recommended</p>
<p>Lack of formalised assessment of areas of ecological significance- inaccurate picture of the ecological sensitivities of the County and compromises the intent of the Appropriate Assessment – does not account for cross county considerations</p>	<p>0105</p>	<p>Manager's Response Submissions from the National Parks and Wildlife Services, the DoEHLG, EPA and Eastern Regional Fisheries Board established areas of ecological significance. These are also detailed within the site synopsis of the pNHAs and cSACs within the Environmental Report. Section 4.8 of the Implementation of SEA Directive Guidelines notes that the Environmental Report is part of a hierarchy of assessment procedures, and that more detailed issues would be considered at local area plan or EIA level.</p> <p>Manager's Recommendation</p>

		No change recommended
Noted that the screening report templates provided for by EU guidance on Appropriate Assessment have not been used, and that these are useful to ensure all the necessary impacts are covered.	0164 0283	<p>Manager's Response The Appropriate Assessment Screening was undertaken using a template arising from a Heritage Training seminar on 26th February 2009 attended by NPWS. Following the subsequent production in December 2009 of the NPWS's detailed guidance document on Appropriate Assessment, the SDCC Screening document was reassessed and no amendments to the outcome of the screening process are deemed to be necessary.</p> <p>Manager's Recommendation No change recommended</p>
Serious reservations about the quality of assessment undertaken, and the gaps and deficiencies in the underlying information and studies including population considerations, flooding and biodiversity and climate change	0154	<p>Manager's Response The most up to date information available was recorded in the baseline. The Draft Flood Management Guidelines, the Draft Dodder CFRAMS, alluvial soil surveying, the Green City Guidelines, and the information gathered as part of the Heritage Plan process all informed the environmental report. Every effort was undertaken to minimise gaps in information. Where information gaps remained, these were noted within the individual sections regarding each section of the baseline. Section 4.8 of the Implementation of SEA Directive Guidelines states that the '<i>SEA involves collating currently available, relevant environmental data; it does not require major new research. Where data deficiencies or gaps exist, this should be acknowledged in the report</i>'. </p> <p>Manager's Recommendation No change recommended</p>
0.3 National, Regional and Local Policy Context		
Request that the following documents be added: Draft Regional Planning Guidelines for GDA – 2010-2022 Meath County Development Plan 2007-2013 Draft Dun Laoghaire Rathdown County	0018 0237	<p>Manager's Response The Draft Development Plan sets out a development strategy for the County in the context of the Regional Planning Guidelines. The Development Plans of adjoining Local Authorities have been considered. Draft Plans have not been taken directly into</p>

<p>Development Plan 2010-2016 Draft Fingal County Development Plan 2011-2017 Draft Kildare County Development Plan 2011-2017 Draft Wicklow County Development Plan 2010-2016.</p> <p>Within the core strategy the names of the counties should be included when referencing RPGs. The county plans within the GDR, and possibly other counties, should be taken into account.</p> <p>Connectivity in terms of new development and development management must be continually monitored between South Dublin, Dublin City, Fingal, Dun Laoghaire-Rathdown, Wicklow and Kildare County Councils in particular.</p> <p>The Development Plan must guarantee the timely preparation, adoption and implementation of Local Area Plans (LAPs), Integrated Area Plans and Strategic Development Zones.</p>		<p>consideration as they have not been adopted. Notwithstanding the above, it should be noted that all plans in the GDA are formulated in the context of the Regional Planning Guidelines. With respect to LAP/ SDZ adoption procedures, these are set out in statute and it is not within the remit of the Development Plan to issue guarantees on their adoption. With respect to development management in adjoining counties the Council has established means of informing itself of relevant development management issues.</p> <p>Manager's Recommendation No change recommended.</p>
<p>0.4.3 General Guidance – Development Management</p>		
<p>Ensure information on EIS submitted with planning application is complete and accurate- checklist of who checked each section signed off should be attached to all grants of permission/report.</p> <p>The Plan should highlight that under the EIA and Planning and Development Regulations certain projects that may arise during the implementation of the Plan may require an Environmental Impact Assessment. There are also requirements with regard to EIA for subthreshold development. It should be noted that the Projects would also be required to be screened with respect to the</p>	<p>0100 0137 0138 0157 0196 0255 0161</p>	<p>Manager's Response Matters relating the preparation of EIS or their requirements are not Development Plan matters. This section of the plan makes reference to these matters however the requirement and assessment of EIA's is a matter for development management and the particular circumstances relating to proposed developments.</p> <p>With respect to the enforcement of Planning legislation Part VIII of the Planning and Development Act sets out the procedures and provisions for dealing with the investigation of unauthorised development. This section of the development plan is a reflection of the legislation in force at present.</p> <p>The Development Plan sets out comprehensive policies for the assessment of planning applications. Given the comprehensive nature of Development plan policies</p>

<p>requirement for Habitats Directive Assessment / Appropriate Assessment as required by Article 6 of the Habitats Directive.</p> <p>Section 0.4.6 should be amended to omit 'where it is appropriate'.</p> <p>Enforcement action against all unauthorised extractive activity must be a priority and the commitment to do so should be noted in Section 0.4.6.</p> <p>Submit that a Policy of mandatory enforcement with adherence to the minimum time limits should be added to the CDP.</p> <p>Suggest that the final bullet point concerning the carrying out of enforcement functions be amended from its somewhat weak wording: to • "Will carry out periodic site visits in order to ascertain compliance with an Enforcement Notice or with conditions attached to permissions and will take action expeditiously if non-compliance is found; • Will be pro-active with regard to enforcement and will not rely on complaints that may be received from third parties."</p> <p>The Draft Development Plan should be amended (Section 0.4) to include reference to a 'Sustainability Matrix' as an implementation tool in the assessment of all planning applications for development. A 'Sustainability Matrix' should be developed with reference to best practice national and international examples and included within the Development Plan.</p>		<p>it is considered that reference to a sustainability matrix is not appropriate at this time. Notwithstanding this consideration may be given to the structure, layout and weighting of such a matrix to assess its suitability in future consideration of policy.</p> <p>With respect to particular forms of building material it is not the function of the plan to promote any particular one. Notwithstanding this section 1.4.38 Energy Efficiency in Buildings does articulate the Council's view on this matter in general- which is supportive of appropriately chosen materials.</p> <p>Manager's Recommendation No change recommended.</p>
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<p>Sustainable Construction overlooked- use of green building materials. CDP should take action to promote the use of construction materials with reduced embodied CO2.</p> <p>Propose to add a section to the CDP dealing with the product carbon footprint of construction materials in order to address green construction and climate change- stated policy to require the use of low carbon concrete, incorporating cements made from recycled industrial by-products- set at a minimum level of 30% of cement used in CDP projects to comprise a recycled industrial by-product such as GGBS or PFA.</p> <p>By 2013 building regs will require buildings in Ireland to be zero carbon from an operational standpoint.</p>		
<p>0.5 Zoning Objectives Matrix</p>		
<p>In the existing Development Plan, all of the land use zoning objectives are contained in Chapter 10, with associated use classes under each zoning. For ease of reference, it is useful to have all of the land use zonings and the zoning matrix in one chapter.</p> <p>Zonings such as those contained in Dublin City, Dun Laoghaire Rathdown and Meath County Development Plans should be incorporated within the Plan.</p> <p>Add the following use classes to the open for consideration under zoning F; nursing home, residential institution, retirement home.</p>	<p>0250 0037 0262 0028 0221 0230</p>	<p>Manager's Response It is considered that the Draft Plan contains sufficient policies and objectives to address the issues relating to land use zoning and the location of nursing homes, residential institutions, retirement homes, education and park and ride facilities in the County. The County Development Plan sets out policies for the County, it is not considered appropriate to change the zoning matrix to provide for land uses on specific sites</p> <p>Manager's Recommendation No change recommended.</p>

<p>Request that the Matrix be amended to include education as 'permitted in principle' in the 'G' zone.</p> <p>Request introduction of 'car park' to Permitted in Principle' use class in the Zoning Matrix for 'GB' zoned lands as alternative to SLO request for IRFU lands at Newlands Cross.</p> <p>The status of 'retirement home' be changed from 'not permitted' to 'open for consideration' in the Matrix associated with Greenbelt zoned land.</p>		
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6.3 A Living Place:

Housing

Social Inclusion, Community Facilities and Recreation

Sustainable Neighbourhoods

6.3.1 Housing

Issue	Sub No	Manager's Response and Recommendations
1.2.8 Social Integration and House-Types, Sizes and Tenures		
<p>Given the existing level of social housing in the area and the current economic climate (re unsold private units) there are serious concerns regarding further ghettoisation of this west Dublin suburb</p> <p>Reiterate need to integrate fully the social and affordable element of any development.</p>	0024 0158	<p>Manager's Response Section 1.2.45 and its subsequent Policy H26: Counteracting Social Segregation sets out a commitment to disallow the provision of large tracts of single class housing and to encourage the development of mixed and balanced communities.</p> <p>Manager's Recommendation No change recommended.</p>
1.2.10 South Dublin County Housing Strategy 2010-2016		
<p>The Council must ensure that a shortage of quality new housing supply does not occur during the life of the new plan.</p> <p>It is suggested that the 15% requirement sought for social and affordable housing should be reduced as it is not warranted in the current climate.</p> <p>Suggests that additional lands should be made available for residential development during the life time of the next plan. The method of how the housing need was calculated should be made public.</p>	0237 0216	<p>Manager's Response. When preparing housing strategies, Housing Authorities are obliged to calculate the percentage of anticipated residential development that would generate an adequate supply of social and affordable housing, Having regard to the flexibility introduced by the Planning & Development Act 2000 (as amended)and having regard to all of the relevant factors a net countywide requirement of 15% affordable/social housing in private residential developments is appropriate. A review of the Housing Strategy, using the latest data available, has been carried out and it is the considered view of the Council that the 15% requirement is appropriate.</p> <p>Manager's Recommendation No change recommended</p>
1.2.12 Strategy		
There should be a proviso in the Development	0058	Manager's Response

<p>Plan that no planning permission be given to any accommodation until at least 90% of the current unoccupied properties are occupied.</p> <p>Section 1.2.12 – Strategy of the Draft Development Plan should be amended to include a specific reference to a phasing strategy whereby specific zoned but uncommitted lands are identified as priority development i.e. Priority 1, Priority 2, Priority 3, in accordance with the sequential approach. In this respect, Adamstown SDZ and Clonburris SDZ should be prioritised for new development.</p>	<p>0255</p>	<p>It is considered that the strategy for the provision of residential development is in accordance with the policies and objectives of national planning guidance and supports the Core Strategy of the Plan to promote a more consolidated and compact urban form for the County. To introduce these recommended changes would be contrary to national guidelines as well as the strategy as set out in the Draft Plan.</p> <p>Manager's Recommendation No change recommended.</p>
<p>1.2.13 Residential Density</p>		
<p>Exclude any apartment blocks and at the minimum any apartment block should be no more than 2 stories high and exclude 1 bed apartments. (Please note that currently most if not all banks will not lend on 1 bed apartments. This should be taken into consideration on any proposed development).</p> <p>Remove policy H2 no upper limit clause and replace with “there shall be no new apartments given planning permission in Tallaght Town Centre until the occupancy of the current apartments reaches 85%</p> <p>Clarify the difference between the limit on units set by Tallaght LAP and new policy H2 that sets no upper limit.</p> <p>Support for Policy H1.</p>	<p>0065 0101 0110 0111 0112 0115 0102 0098 0157 0196 0255</p>	<p>Manager's' Response</p> <p>It is considered that the Council's policies on residential density are in line with national guidelines and the policies set out in the Draft Plan provide for the consolidation of the County in appropriate locations while ensuring a balance between reasonable protection of existing residential amenities and the established character of areas.</p> <p>Any infill development carried out by the Council on Council owned lands is subject to the necessary public consultation process, this policy statement adequately provides for this consultation and examination of alternative usable open spaces in all instances.</p> <p>Manager's Recommendation No change recommended.</p>

<p>Concur totally with the statement of policy at section 1.2.14.vi Policy H6.</p> <p>Recommend following addition to Section 1.2.52.ii "In genuine cases where the adult child of an elderly parent wishes to move to the area to look after the parent, the Council will give favourable consideration to modification and extension of the parent's house, to provide separate accommodation within the one structure, in preference to the building of an additional separate residence."</p> <p>Recommend that the following should be inserted into Section 1.2.14 Policy H6 'In all instances, this policy will only be pursued where in-dept consultation takes place with the relevant communities concerned and when examining nearby alternative usable open space takes account all age groups.</p>		
<p>Section 1.2.14.iii</p>		
<p>Request the amendment of the definition of brownfield lands in accordance with the definition used in current National Guidance.</p>	<p>0249</p>	<p>Manager's Response It is agreed that the definition of Brownfield Sites as outlined in Policy H3 should be amended.</p> <p>Recommendation: To amend Policy H3 to read: It is the policy of the Council to maximise any land which has been subjected to building, engineering or other operations, excluding temporary uses or urban green spaces and in particular to maximise redundant industrial lands identified as Enterprise Priority One zoned lands to consolidate the County and where such sites are identified that are close to existing or planned future public transport corridors, the opportunity for their redevelopment to higher densities will be promoted, subject</p>

		to safeguards outlined in Sustainable Neighbourhoods in Section 1.4 and in accordance with Local Area Plans or Approved Plans.
1.2.15 Housing for the Elderly including Nursing Homes		
Notes that in relation to Residential Care Centres that SDCC has made no attempt to address the planning concerns that residents have highlighted.	0258	<p>Manager's Response It is considered that Section 1.2.35, Policy H20 Housing for the Elderly including nursing homes and Policy H21: Locations for Housing for the Elderly adequately address the issue of location of Residential Care Centres in the South Dublin County.</p> <p>In terms of saturation of centres in particular areas, the Council will endeavour to coordinate with the Health Service Executive regarding the location of such centres.</p> <p>Manager's Recommendation No change recommended</p>
1.2.17 Protection of Residential Amenity in Existing Areas		
Housing – no structure and out of keeping with the local area to be developed on Kennelsfort Road Palmerstown or Griffeen Road Lucan	0281	<p>Manager's Response Section 1.2.17 Protection of Residential Amenity in Existing Areas states that 'In order to protect residential amenity, the zoning objectives for residential areas are framed so as to exclude non-compatible uses. In addition, the standards set out in the Plan seek to ensure that any new development in existing residential areas (e.g. extensions, additional houses in side gardens, etc.) would have a minimal impact on residential amenity.'</p> <p>Policy H11: Residential Amenity in Existing Residential Areas states that 'It is the policy of the Council to protect and improve residential amenity in existing residential areas.'</p> <p>It is considered that Section 1.2.17 and Policy H11 adequately addresses the issue raised.</p> <p>Manager's Recommendation</p>

		No change recommended
1.2.19 Conservation of Housing Stock		
Section 1.2.19 should make reference to concrete being a recyclable material, adaptable to refit and modified and with a much longer service life.	0100	<p>Manager's Response Section 1.2.19 and Policy H12 Conservation of Housing Stock gives details of the importance of conserving the County's housing stock and the benefits associated with doing so, to the environment. It is not considered appropriate in this section to list the benefits of using one particular material when building housing units.</p> <p>Manager's Recommendation No change recommended</p>
1.2.27 Extensions to Dwelling Houses		
Specific suggestions regarding the need to allow individual houses to be flexible so that people do not have to move house if their circumstances change.	0158	<p>Manager's Response South Dublin County Council acknowledges that domestic extensions are an effective way for homeowners to provide extra space without having to move house when their accommodation needs change. Proposals for domestic extensions should have regard to the House Extension Design Guide and safeguards set out in Section 1.2.27 of the Draft Plan.</p> <p>It is considered that the House Extension Design Guide and the requirements of Section 1.2.27 and Policy H16 adequately address the issue raised.</p> <p>Recommendations No change recommended</p>
1.2.47 Traveller Accommodation programme		
Objects to the eleven bay traveller accommodation within Brittas.	0071	<p>Manager's Response Policy H27 Traveller Accommodation Programme states that 'it is the policy of the Council to implement the <i>Traveller Accommodation Programme 2009-2013 (and subsequent updates)</i>. In accordance with the Programme, residential caravan parks and Traveller specific group housing schemes will be provided for the accommodation of Travellers who normally reside in the County and who are included in the most recent Assessment of Need for Traveller-specific</p>

		<p>accommodation, in addition to providing standard social housing to meet their needs.'</p> <p>Section 1.2.47 Traveller Accommodation Policy states that 'Because of the serious need to provide accommodation for Travellers and the difficulties associated with such provision, it is the intention of the Council to avail of all opportunities for implementing the Traveller Accommodation Programme.</p> <p>Any development of Traveller Accommodation is subject to compliance with the standard planning application process associated with the proper planning and sustainable development of the County.</p> <p>In light of the above, it is noted that the provision of Traveller Accommodation is outside the remit of the Development Plan, which is to implement the <i>Traveller Accommodation Programme 2009-2013</i>.</p> <p>Manager's Recommendations No Change recommended.</p>
<p>1.2.51 Management of One- Off Housing in Rural Areas</p>		
<p>The regulations governing rural housing should be relaxed and a softer interpretation of 'a genuine need to live in the area'</p> <p>Please ensure that the new Development Plan 2010-2016 caters for people who are intrinsically linked to be favourably considered in all rural landscape zones.</p> <p>It appears that the draft plan does not take into account the "Sustainable rural housing Guidelines 2005" or the Department Circular SP5/08 in relation to the local need policy.</p>	<p>0071 0211 0212 0157 0196 0286 0243 0252</p>	<p>Manager's Response</p> <p>The Draft County Development Plan sets out a coherent spatial planning framework for the entire County within the context of national and regional policies. The core strategic aim of the Plan is to promote, at appropriate locations, a more consolidated and compact urban form for the County. It is generally accepted that rural housing should not be encouraged as by its nature it constitutes an unsustainable form of development and is contrary to the core strategy of consolidation and has the potential to negatively impact both directly and cumulatively on the environment.</p> <p>However, it is also accepted that limited rural housing should be facilitated where justifiable. The criteria in which planning applications are assessed for rural one-off housing are set out in the Development Plan and associated Plans. The planning authority is not in a legal position to take into consideration the individual personal</p>

<p>Local needs should be qualified equally across the landscape zones. All exclusions would be applicants who have already received permission for a local rural house.</p> <p>The Council appears to have overlooked An Bord Pleanála's comments relating to the Glenasmole/Bohernabreena Housing and Planning Study.</p> <p>Propose the following amendment to Policy H33 "Any proposed development within the Study Area will be subject to criteria and constraints as set out in the Study in so far as they are consistent with Policies H29-31 and the Sustainable Rural Housing Guidelines (2005), giving due regard to the assessment requirements of the Habitats Directive regarding the protection of the integrity of Natura 2000 sites".</p> <p>Recommend following addition to Section 1.2.52.ii "In genuine cases where the adult child of an elderly parent wishes to move to the area to look after the parent, the Council will give favourable consideration to modification and extension of the parent's house, to provide separate accommodation within the one structure, in preference to the building of an additional separate residence."</p> <p>Planning applications for residential uses or associated with agricultural use of lands within the security zone need not be subject to absolute restrictions on development when made by immediate family members of existing land owners and will be given due consideration on their height,</p>	<p>circumstances of applicants applying for permission for a one-off rural dwelling. All applications are assessed based on the criteria included in the Development Plan and associated Plans in a fair and equitable manner, which underpins the core principle of the Irish planning system which is based on the common good and sustainable development supported by local democracy and public participation. It should also be noted that Section 1.2.31 of the Draft Development Plan sets out policies in relation to Family Flat development which refers to the temporary sub-division or extension of a single dwelling unit to accommodate a member of the immediate family for temporary a period (e.g. older parent or other dependent).</p> <p>Section 1.2.12- The Strategy for housing set out in the Draft Plan reflects the policies and objectives of the national planning guidance including Sustainable rural housing Guidelines (2005). Circular SP5/08 required that all County Councils examine their current or draft Development Plan policies and practices to ensure compatibility with the provisions of Articles 43 and 56 (Freedom of Establishment and Free Movement of Capital) of the EU Treaty. Having reviewed the Draft Development Plan it is recommended that the Plan be amended to conform with the above Articles to state;</p> <p>It is inherent within the Polices of the Draft Plan that the provisions of each policy will be consistent with the next, and in accordance with the Strategy of the Plan, be consistent with the relevant national planning guidance.</p> <p>Manager's Recommendation</p> <p>Amend Draft Development Plan to include the following policy amendment to state:</p> <p>Notwithstanding the assessment criteria relating to the rural, mountain and high amenity zones outlined above, and in accordance with Circular SP5/08, a bone fide applicant who may not already live in the area, nor have family connections there or be engaged in a particular employment or business classified within the local needs criteria, will be given due consideration within the proper planning and sustainable development objectives for the area subject to the following considerations:</p> <ul style="list-style-type: none"> - applicants will be required to satisfy the planning authority of their commitment to
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<p>scale and impact on the environment.</p> <p>Request that the Draft SDCC Development Plan 2010-2016 be amended to ensure limited rural housing should be facilitated where justifiable in the area and that planning applications in the area should be assessed with reference to eligibility criteria set out in section 9.2.1 of Bohernabreena / Glenasmole Housing Study 2002.</p> <p>The eligibility criteria set out in H31 in the Draft Development Plan 2010-2016 is overly restrictive. In particular it fails to recognise the interest of persons local to or linked to rural areas who are not engaged in significant agricultural or rural resource related occupation, to live in rural areas.</p> <p>Believes that the rural housing policies are too restrictive and request the following inclusion in the Plan: "Such circumstances should also encompass a person such as a Registered General Nurse looking after an immediate elderly family member or any member of the community in a professional capacity, full or part time, that would otherwise require hospitalisation should be included as open for consideration in the new proposed plan, for planning in rural area zone 'H'</p>		<p>operate a full-time business from their proposed home in a rural area, as part of their planning application (to discourage commuting to towns and cities);</p> <ul style="list-style-type: none"> - applicants will be required to outline how their business will contribute to and enhance the rural community; and - applicants will be required to satisfy the planning authority that the nature of their employment or business is compatible with those specified in the local needs criteria for rural areas so as to discourage applicants whose business is not location-dependent (e.g. telesales or telemarketing).' <p>All planning applications for houses in rural areas, regardless of where the applicant comes from or whether they qualify under specific criteria, will continue to be determined on the basis of the proper planning and sustainable development of the area, in accordance with the core strategy of this Development Plan and in particular the Development Plan policies regarding environmental concerns.</p>
<p>1.2.53 Domestic Effluent Disposal</p>		
<p>Queried the year of publication of the document: "Wastewater Treatment Manual on Treatment Systems for Single Houses.</p> <p>Reference should be made as appropriate to the</p>	<p>0004 0254</p>	<p>Manager's Response</p> <p>The date of publication of "Wastewater Treatment Manual on Treatment Systems for Single Houses² shall be corrected and reference to the suggested Code of Practise should be made.</p>

<p>Code of Practice: Wastewater Treatment and Disposal Systems Serving Single Houses (p.e < 10), (EPA, 2009).</p>		<p>Manager's Recommendation Amend Section 1.2.53 as follows. (1) Replace the second paragraph with the following: "On sites where the use of a septic tank or alternative treatment system is proposed, the proposed tank or system and the percolation area shall comply with the requirements of the Code of Practice: Wastewater Treatment and Disposal Systems Serving Single Houses (p.e < 10), (EPA, 2009) (or as may be amended from time to time)." (2) Delete the third paragraph. (3) Replace the final sentence in the fourth paragraph with the following revised text; "The Site Characterisation Form in Annexe C.3 of the Code of Practice: Wastewater Treatment and Disposal Systems Serving Single Houses (p.e < 10) (EPA, 2009) shall be used for this purpose regardless of the type of system proposed."</p>
<p>1.2.59 Naming of Housing Developments</p>		
<p>Section 1.2.59 - The public should be involved in the naming of new housing developments.</p>	<p>0107</p>	<p>Manager's Response Section 1.2.59 of the Draft Plan states that 'it is an objective of the Council that a body be set up in the County, during the lifetime of the Plan subject to the resources of the Council, to assist in the use of the Irish language in naming new housing developments.'</p> <p>Policy H41 Naming of Housing Developments states that 'it is the policy of the Council that the naming of new residential development will reflect the local and historical context of its siting and should include the use of the Irish language.'</p> <p>It is considered that the above section and policy adequately address the issue raised.</p> <p>Manager's Recommendation No change recommended</p>

6.3.2 Social Inclusion, Community Facilities and Recreation

Issue	Sub No	Manager's Response and Recommendations
1.3.31 Open Space		
<p>The amenity grounds (Coldcut Road Clondalkin Dublin City Services Sports and Social Club) are the only safe and continually monitored recreational grounds within North Clondalkin</p> <p>A lot more green areas are needed in particular in Cookstown</p> <p>Tallaght village Area needs more green space</p> <p>Reinstate the Pocket Park that was previously allowed for in the zoning of the Main Road at the site of MPI (now Lidl).</p> <p>Purchase Coats' Land and enlarge Waterstown Park</p> <p>Cooldrinagh lands should be made into a public park</p> <p>Request that Rathcoole Park should be maintained in order to provide biodiversity corridors for wildlife between Rathcoole Park and the hinterlands of Rathcoole</p> <p>A contribution towards the development of the Park was made by the community in 1991 to ensure that the community had an amenity area for generations to come. This contribution was given to the Council in good faith that Rathcoole</p>	<p>0024 0025 0058 0065 0101 0110 0111 0112 0115 0105 0137 0138 0144 0154 0281 0258</p>	<p>Manager's Response Section 1.3.31 of the Draft County Development Plan sets out the broad assessment of the level of provision of open space within the county as well as the hierarchy of spaces upon which the provision of open space is based upon. Policies SCR 33-40 provide the basis for the current and future provision and management of open space within the County. The Tallaght Town Centre Local Area Plan, which is a separate document to the Draft Development Plan, provides for the future development of Tallaght Village, amongst other areas and particularly sets out a framework around which applications for future development in the area will be assessed. Areas of public open space referred to are provided for in the Local Area Plan and any Planning Application for development in the area must provide for open space which is open to the public. Any rezoning or redevelopment of lands under Zoning Objective F "To preserve and provide for Open Space and recreational Amenities" is carried out in accordance with the provisions of the Planning and Development Act 2000-2009 and subject to the relevant public consultation procedures.</p> <p>Manager's Recommendation No change recommended.</p>

<p>Park would be preserved as a green space for residents and wildlife</p> <p>Corkagh Park be enhanced to encourage more local use</p> <p>Alarmed that certain open spaces are being 'rezoned'</p> <p>Notes that there is an inconsistency in the manner in which SDCC protects their open spaces compared with other neighbouring local authorities</p> <p>Object to the proposal that the residents of the Owendoher Haven will lose their green open space as part of extension/redevelopment of the site</p>		
<p>1.3.35 Recreation</p> <p>The Plan should include the phrase 'and accompanying map' after 'Asset Management Plan'. (Policy SCR52- Tourism Recreation)</p> <p>With regard to the operation of Tallaght Stadium The Development Plan must state that they will always fully respect and fully comply with all the conditions in the planning permission granted by the County Council, An Bord Pleanála and the High Court.</p> <p>The County Development plan speaks for ordinary people, Councillors, Managers and Officials must engage directly with local communities, take due account of the needs, aspirations and concerns of people who live near Council amenities and give protection to the people of the County in their</p>	<p>0014 0123 0159 0018 0014</p>	<p>Manager's Response</p> <p>Tourism recreation is dealt with under Theme 1, A living Place as the most suitable section to create policies and objectives for the promotion and facilitation of the tourism assets of the County with a focus on the recreational benefits for residents and visitors rather than economic and enterprise factors. The plan acknowledges the broad range of recreational and natural facilities of the County throughout. South Dublin County Council is involved in a wide range of public consultation activities and it is intended to continue and further expand these activities in line with the County Development Board Strategy and the Council's Corporate Plan. Section 1.3.35 of the Draft Plan provides policies and objectives for the provision of recreational facilities for all age groups on suitable sites, this accompanies the relevant policies for open space, play areas and a wide range of amenities across the County and this provision is not influenced by any rezoning of lands in the County for other Land Use Zoning Objectives.</p> <p>Manager's Recommendation</p> <p>No change recommended.</p>

<p>homes.</p> <p>Would like to see Development plan taking into consideration additional amenities for the large built up areas such as Lucan/Clondalkin/Newcastle and Rathcoole instead of rezoning additional and unnecessary lands from agricultural to EP3</p> <p>Request that Policy SCR52 be relocated to Theme 3 and that it should be expanded to include an array of country recreational activities and should be cross-referenced to Section 2.2.14.</p> <p>Requests that the Plan acknowledge the role the various indoor facilities have to play with respect to tourism, such as the National Basketball Arena. (Section 1.3.35)</p>		
<p>1.3.19 School and College Sites</p>		
<p>Seeks the removal of the "Primary School" Objective having regard to the number of existing schools, which serve the area- (Ballycullen Area)</p> <p>The provision of schools within Magna Business Park, zoned for Enterprise and Employment Use, is not in our view an appropriate location for such a use from a sustainable development and a health and safety perspective</p> <p>Recommend new Policy "that it is the policy if the County Council to recognise the needs for sustainable development of existing schools and</p>	<p>066 0201 0132 0231 0281 0282</p>	<p>Manager's Response</p> <p>It is important to note that the Department of Education and Science is the responsible body for the forecasting of level of demand for schools and for the funding and provision of schools to meet this demand. In accordance with the Provision of Schools and the Planning System, A Code of Practise for Planning Authorities (2008) the Council will co-operate and co-ordinate with the Department on this matter. Section 1.3.19 of the Draft Development Plan and subsequent policies- Policies SCR10-SCR15 as well as section 1.3.21 Childcare and Pre-School facilities and subsequent Policies SCR16-SCR28 set out a comprehensive approach to facilitating the provision of schools and school sites and associated services and amenities as required.</p>

<p>educational institutions for their sites, and to help them remove the obstacles and unblock the blockages to their development”</p> <p>Proposes the provision of a secondary school site in Lucan.</p> <p>Department of Education and Science requests that site reservations be made as close as possible to existing community facilities such as sports facilities/libraries etc. so that they can be shared.</p> <p>The Dept. Education and Science are open to the concept of multi-campus arrangements</p> <p>Highlight the need to consult the Dept. of Education and Science in the assessment of specific school sites.</p>		<p>With regard to the removal of specific objectives for the provision of Primary Schools on lands within the County- these objectives were placed on lands as part of a Local Area Plan or Planning Application process whereby the provision of these lands were required as a condition of permission for development or as a requirement to enable development to be carried out in this area. The location of such objectives has been considered appropriate by the Council in terms of future land use planning and it is not considered appropriate or necessary to remove such objectives unless advised in writing by the Department of Education and Science.</p> <p>Manager's Recommendation No change recommended.</p>
<p>1.3.13 Arts in the Community</p>		
<p>Too much concentration of funding for the arts in Tallaght, with the virtual exclusion of other areas; such as Lucan- Balance should be redressed</p>	<p>0105 0137 0138 0144</p>	<p>Manager's Response Section 1.3.13 of the Draft Plan- Arts in the Community sets out a commitment to prepare and Arts Development Plan for the period 2011- 2015 as required under the Arts Act 2003- this plan , amongst other things, will prioritise direction for future development and advancement of arts and culture across the County. The Arts Development Strategy 2006-2010 is the current framework document for arts development.</p> <p>Manager's Recommendation No change recommended.</p>
<p>1.3.21 Childcare and Pre School Facilities</p>		

<p>Request that policy SCR28 Location of Childcare and Pre-school Facilities, should read adjacent to primary school and secondary school campuses.</p> <p>Section 1.3.21 page 60 of the Plan states that the Council will require smaller developments to pay a development contribution to enable appropriate childcare provision to be made elsewhere. This provision should be removed as it is ultra vires to the Planning and Development Act.</p>	<p>0132 0231 0237</p>	<p>Manager's Response The Council supports the co- location of childcare and pre-school facilities beside both primary and secondary school campuses. The ability to be flexible in the approach to the provision of childcare facilities in line with the Childcare Facilities Guidelines (2001) is considered to be a positive measure whereby smaller developments can pay a development contribution to enable appropriate provision to be made elsewhere to the benefit of the wider community as well as residents of a new residential development.</p> <p>Manager's Recommendation Rewording of Policy SCR 28 to read " It is the policy of the Council to facilitate and support through the planning process the location of childcare and pre- school facilities on the same campuses as primary and secondary schools or adjacent to primary and secondary school campuses."</p>
<p>1.3.15 Community Facilities</p>		
<p>Request that St. Cuthbert's Park be provided with a community centre.</p> <p>Community Services – proposes the provision of a community centre, an enterprise centre and a health centre in Newcastle; retention of the manor road health clinic and provision of a library in Palmerstown; proposes the Deansrath health centre cater for the Bawnogue area and that a site be identified for relocation of the Bawnogue Family resource Centre.</p>	<p>0245 0281</p>	<p>Manager's Response Section 1.3.15 of the Draft Plan identifies the range of community facilities currently provided in the County and outlines that Community Services provide a range of grant aid to assist in the provision and management of community facilities- this is supported by Policy SCR 8: Provision and Management of Community Facilities. The development of individual sites and centres is facilitated by this policy and is dealt with through the Community Services Department in co operation with relevant stakeholders. Where stakeholders- such as the Health Service Executive have statutory obligations to provide services such as Health Centres the Council will support the provision of such facilities.</p> <p>Manager's Recommendation No change recommended.</p>
<p>1.3.33 Urban Forestry</p>		
<p>Would like to see some mention of protection/promotion of native flora and fauna and</p>	<p>0158</p>	<p>Manager's Response Section 1.3.33 Urban forestry adequately addresses the value of Urban Forests in</p>

<p>biodiversity under Urban Forestry policy, as in the Green Routes policy.</p>		<p>terms of their contribution to the protection and enhancement of the environment.</p> <p>Manager's Recommendation No change recommended.</p>
<p>1.3.37 Children's Play Facilities</p>		
<p>Would like to support the inclusion of a playground within Rathcoole Park</p> <p>Playgrounds - endorses the inclusion of a playground in Rathcoole Park and proposes playgrounds be provided in Palmerstown and Liffey Valley area of Lucan; endorses proposals for open spaces and a park in the Newcastle LAP, and proposes development of a playground within the park</p> <p>Notes that SDCC has failed to recognise that play and recreation facilities are in fact infrastructure and have to be planned for</p>	<p>0154 0281 0258</p>	<p>Manager's Response Section 1.3.37 and subsequent policies SCR53-SCR59 of the Draft Plan deals comprehensively with the issue of Children's Play Facilities. South Dublin County Council, in line with the National Play Strategy, Ready Steady, Play! (2004), have developed a Countywide Policy on the development and management of playgrounds and play areas "Developing Play in South Dublin County 2006-2009" and the Development Plan will be further informed by subsequent Play Policies. There is a body of guidelines and standards which are discussed in depth in this section of the Draft plan which direct the planning and provision of play facilities in the County.</p> <p>Manager's Recommendation No change recommended.</p>
<p>1.3.41 Allotments</p>		
<p>Recommend that Policy SCR62 of the Draft Development Plan be amended as follows: 'It is the policy of the Council that in areas zoned residential of mixed development that a proportionate area of land for allotment use be required and encouraged where the development proposed is substantially or completely apartment style development.'</p> <p>Request that the Council increase allotment usages by developing more of them within the</p>	<p>0255 0245 0158</p>	<p>Manager's Response Policy SCR61 of the Draft Plan provides for the examination of the potential to promote and extend the allotment schemes throughout the County based on the increasing demand for such. The Draft Plan makes a strong policy commitment through Policy SCR62 to promote and encourage the development of allotments in predominantly apartment style developments.</p> <p>Where section 1.3.41 discusses allotments located on lands which may be developed for alternative uses in the future, this paragraph should be deleted and a comment on the benefits of allotments inserted.</p>

<p>county.</p> <p>As none of the current allotment sites are situated on land which is or proposed to be zoned for development, the submission questions how relevant is the statement in final paragraph of 1.3.41</p>		<p>Manager's Recommendation Remove the third paragraph of section 1.3.41 Allotments. The second paragraph of this section should now read; Allotments have been constructed in a number of public parks and they have been an outstanding success to date. It is an objective of the Council to provide allotments in parks taking into consideration the demand for the facilities and the presence of a high level of supervision within the park. Allotments offer the opportunity to provide education in horticulture as well as on the sustainable value of home food production.”</p>
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6.3.3 Sustainable Neighbourhoods

Issue	Sub No	Manager's Response and Recommendations
Section 1.4 Sustainable Neighbourhoods		
<p>South Dublin County Council should avoid being too prescriptive in the implementation of the new plan. National guidelines such as the Sustainable Residential Development in Urban Areas do not prescribe any rigid standards for e.g. private amenity space. The Guidelines encourage planning authorities to be flexible in their approach to urban positioning and design. Section 1.4</p>	0237	<p>Manager's Response The Plan looks at innovative ways of achieving the standards as set out in the Sustainable Neighbourhoods section of the plan which are both necessary and reasonable.</p> <p>Furthermore, this section of the plan seeks to connect the county through opening up movement routes and creating safer well surveyed streets which will in turn encourage the revitalisation and rejuvenation of local communities.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Opposes the naming of the R405 and R120 as regional distributor roads because they have been constructed as local rural roads. Table 1.4.1</p>	0107	<p>Manager's Response The naming and grading of roads is not a Development Plan matter. The information contained within Table 1.4.1 takes the conventional terminology for the roads and defines them for the purposes of urban design by movement, place making and accessibility functions.</p> <p>Manager's Recommendation No change recommended.</p>
<p>States that concrete construction directly supports Policies SN33 Section 1.4.37.iv and SN34 in Section 1.4.40.i.</p>	0100	<p>Manager's Response It is considered that the plan, specifically within Sections 1.4.36-1.4.39, ensures that into the future all new building development will employ materials with a low embodied energy, sourced from local sustainable sources and ultimately readily capable of being recycled. It is not considered necessary to state specific materials and methods of construction within the plan as it may have a negative impact of excluding new materials that may be devised during the lifetime of the plan.</p> <p>Manager's Recommendation No change recommended</p>
Section 1.4.3		

<p>In section 1.4.3. we propose the addition of the following paragraphs: Recommend following addition to section 1.4.3.v Pedestrian/Vehicular segregation; “The segregation of pedestrian and vehicular use. This can be achieved by servicing developments peripherally, and creating inner spaces, free of cars, where social communication is encouraged, and where safe children’s play facilities can be included.” Dedicated pedestrian and cycle routes clearly segregated from vehicular use.</p> <p>1.4.4.vi City Village Concept A City Village concept encouraging a mix of uses and of sizes and types of residences. This should involve, e.g. the total integration of affordable housing and the availability, within walking distance of schools, shops and essential services. It will be an objective of the Plan that the requirement of Section 94 (4)(c) of the Planning and Development Act, 2000, be generally applied, and that the alternatives allowed to be considered under Section 96 be not generally invoked. [In this connection, the selection of ‘left-over’ sites for the concentration of social and affordable housing is not satisfactory, is contrary to the objective in the above paragraph and creates</p>	<p>0157</p>	<p>Manager’s Response Section 1.4.3 outlines the key principles of urban design rather than specific design aspects. It is considered that the ‘Key Principle of Urban Design’ Section of the plan is sufficient in outlining the key principles of urban design and is in keeping with the government guidelines.</p> <p>Manager’s Recommendation No change recommended.</p>
<p>1.4.4.vi</p> <p>Concern regarding Section 1.4.4.vi City Village Concept-In this connection, the selection of “left-over” sites for the concentration of social and affordable housing is not satisfactory, is contrary to the objective in the above paragraph, and creates ghettoisation.</p>	<p>0157 0196</p>	<p>Manager’s Response Policies and objectives contained within the plan, specifically those contained within Sustainable Neighbourhoods and Housing chapters will ensure and encourage integration and social inclusion.</p> <p>Manager’s Recommendation No change recommended.</p>

<p>Section 1.4.7 and 1.4.16</p>		
<p>Suggest addition to be inserted after Par 1.4.7; "In all proposals to open up new areas involving 20 or more residences, applications should be assessed by a panel of at least three eminent independent architects and town planners for the quality of design and arrangement</p> <p>Suggest addition to Section 1.4.16 "It is a policy of this Council that – • Applications for landmark buildings of 8 storeys or over shall be of exceptional architectural quality, and shall be assessed by a panel of three eminent independent architects. • Environmental impact assessment shall be required for all applications for high buildings, with particular regard to climatic (wind funnelling) effects, shadowing, and visual impact on adjacent areas. • In view of the national and international objectives to reduce energy consumption, the energy balance per occupant shall be assessed, and any increase in height resulting in increase per capita energy requirement shall not be permitted. • A study shall be set up to identify areas and sites suitable for high buildings</p>	<p>0157 0196</p>	<p>Manager's Response It is considered that the policies and objectives contained within the plan, specifically those contained within Sustainable Neighbourhoods and Housing chapters, and government guidelines will ensure high quality design throughout the County.</p> <p>Section 3.3.32 of the plan sets out the Council's policy and objectives for landmark buildings. Landmark buildings are seen as a crucial element of urban legibility by assisting successful orientation and way finding in addition to creating a sense of place. The significance of landmark buildings need not be limited to their height and their presence may be enhanced by changes in building form, colour and construction. The plan sets out a desired maximum height of 5 stories but recognises that where there is a strong design rationale for an increase in height this can be accommodated through individual assessment of each proposal. Furthermore Section 1.4.36 sets out policies and objectives relating to 'Climate Sensitive Design'.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Section 1.4.14 Street Networks</p>		
<p>Use of materials in green-routes should be considered first and foremost for their suitability for the natural environment, the minimal disruption their installation occasions, and their ability to blend in with the natural landscape. Routing of same should be considered in the context of minimal alteration of the existing landscape and its features. Section 1.4.9 Street Environment</p>	<p>0137 0138</p>	<p>Manager's Response The Council seek to promote high quality materials and design. The use of materials is considered to be a matter of design and this should be dealt with on a case by case basis.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Section 1.4.16..ii Building Heights</p>		

<p>Section 1.4.16..ii Determining Building Heights- Requests that building heights in Tallaght village and other villages should not exceed 3 storeys including penthouses, as previously required in the Tallaght Town Centre Plan 2000</p> <p>Encourage new construction of appropriate 'signature' buildings, and avoid adopting too prescriptive an approach in terms of the built environment (including density and building height).</p>	<p>0130 0237</p>	<p>Manager's Response The building height section of the plan is not significantly prescriptive. It does however have safeguards which protect the amenity of existing dwellings from proposals for new development. It is important to recognise that where there is a strong design rationale for an increase in height, and where the location can accommodate this height, development should not be restricted through over prescription contained within the plan. Each proposed development site must be assessed on its merit. The plan requires that proposed development must take cognisance of the height of surrounding development and should seek to ensure a gradual change in buildings heights with no significant marked increase in building height in close proximity to existing housing. Section 3.3.32 of the plan sets out the Council's policy and objectives for landmark buildings. The landmark section of the plan is not significantly prescriptive. Landmark buildings are seen as a crucial element of urban legibility by assisting successful orientation and way finding in addition to creating a sense of place. The significance of landmark buildings need not be limited to their height and their presence may be enhanced by changes in building form, colour and construction. The plan sets out a desired maximum height of 5 stories but recognises that where there is a strong design rationale for an increase in height this can be accommodated through individual assessment of each proposal.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Section 1.4.26 Clothes Drying Facilities</p>		
<p>Suggest clothes drying facilities should be outdoors where at all possible and that the policy be applied to nursing home or retirement village development</p>	<p>0158</p>	<p>Manager's Response Section 1.4.26 sets out the objectives and policies relating to clothes drying facilities. Policy SN24 clearly states that all dwelling houses with rear gardens should be provided with a clothes drying area and all apartments should be provided with either a well ventilated clothes drying area or clothes drying facilities on balconies which would be obscured from view. Dwellings within retirement villages would also be subject to this policy.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Section 1.4.36 Climate Sensitive Design</p>		

<p>Request the implementation of SuDS and the application of Greater Dublin Strategic Drainage Study.</p> <p>Hope that SuDS policy will be applied to front gardens and driveways/parking spaces of houses.</p>	<p>0257</p> <p>0158</p>	<p>Manager's Response Section 2.3.12.ii states the Council's policy to ensure that all development proposals incorporate SuDS. Section 2.3.6.i (Policy WD1) sets out the Council's policy regarding the GDSDS. All development proposals shall be subject to the five Regional Drainage Policies of the Greater Dublin Drainage Strategic Study. Guidance in relation to SuDS to ensure effective implementation is required.</p> <p>Manager's Recommendation Insert new section in Living Place - Sustainable Neighbourhoods as follows:</p> <p>Parking and hard standing areas shall be constructed in accordance with the Manager's Recommendations of the Greater Dublin Strategic Drainage Study for Sustainable Urban Drainage Systems (SuDS) and include measures to prevent drainage from hard standing areas entering onto the public road. (see also Section 2.3.9 - Ground and Surface Waters)</p>
<p>Policy SN30 states that Council Policy is to promote appropriate renewable energy, with particular reference to residential development. According to the Plan, the use of on-site micro renewables or district heating systems will offer significant opportunities. While it is noted that 'environmental' initiatives are being provided by South County Council in the plan it must be stressed that some initiatives have not been tried and tested in the marketplace. Such environmental initiatives should be treated as a 'pilot projects'. Developers who are conditioned to provide for such initiatives must be grant aided by the Council in request of these requirements. Such additional costs are prohibitive in the current economic environment, and will act as a deterrent for promotion of future development. Section 1.4.36</p>	<p>0237</p>	<p>Manager's Response It is the policy of the council to promote appropriate renewable energy and the council will give support where it is proposed to use greener methods of development. The council will support developments where the orientation, topography and surrounding features are used to control wind effect, while optimising the benefits of sunlight, daylight and solar gain have been taken into account within design proposals. It is considered that those who seek to purchase homes in the future will consider not only location but also energy ratings and facilities for renewable energy. The role of the plan is therefore to ensure that where proposals are made for the use of renewable energy they will be promoted and supported by the Council.</p> <p>Manager's Recommendation No change recommended.</p>

6.4 A Connected Place

Transportation

Water Supply and Drainage

Environmental Services

Telecommunications and energy

6.4.1 Transportation

Issue	Sub. No.	Manager's Response and Recommendation
Public Transport		
<p>Would like it to be stated in Connected Place that the County is well served by public transport and is accessible and this adds to the County's attractiveness as a tourism location.</p>	0014	<p>Manager's Response This can be addressed by amending the commentary in Section 2.2.2.</p> <p>Manager's Recommendation Amend the fourth paragraph of Section 2.2.2 by inserting the following new sentence after 'Saggart': The County is now well served by public transport and is accessible and this adds to the County's attractiveness as a tourism location.</p>
<p>The requirement to continue and front-load infrastructure is very important to the County therefore the development plan should be flexible in order to adapt to national transport and infrastructure strategy objectives as they arise.</p>	0237	<p>Manager's Response The transportation infrastructure provisions in the Draft Plan reflect the priorities set out in the development programmes of all relevant agencies. Any new initiatives that may arise within the six-year timeframe of the plan can be incorporated as appropriate by a variation of the plan.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Amend Policy T19 and paragraph 2.2.3 to state "Protect the capacity, efficiency and safety of national road infrastructure including junctions and keep the number of junctions to a minimum consistent with good traffic management" .</p>	0008	<p>Manager's Response An appropriate amendment should be made to Policy T19.</p> <p>Manager's Recommendation Amend Section 2.2.25.i to replace the existing policy statement with the following revised statement: It is the policy of the Council to protect the capacity, efficiency and safety of national routes, including junctions, and to keep the number of junctions to a minimum consistent with good traffic management.</p>

<p>The road-focused strategy in the Plan should be replaced with a focus on public transport provision.</p>	<p>0105 0137 0138 0144</p>	<p>Manager's Response The proposed Development Plan is particularly focused on non-car modes of transport, including public transport, walking and cycling infrastructure.</p> <p>Under 2.2.4 Sustainable Modes of Transport, the Draft Development Plan states:</p> <p><i>Affecting a modal shift from the private car to more sustainable modes of transport, including public transport, walking and cycling will be a paramount objective to be realised in the implementation of policies to support sustainable modes of transport.</i></p> <p>A considerable number of the policies of the Draft Development Plan directly relate to public transport including:</p> <p>Policy T1 Sustainable modes of transport Policy T3 Transport 21 and Dublin Transportation Office Strategy Policy T4 Quality Bus Network Policy T5 and T6 Luas and Light Rail Transit (LRT) Extension Policy T7: Metro Railway System Policy T8 Interconnector Tunnel Policy T9 Public Transport Links to Rural areas Policy T10 Pilot School Bus Service</p> <p>Manager's Recommendation No change recommended.</p>
<p>The Development Plan must state that excellent public transport service comes well ahead of company and or staff demands, and that buses must give value for public money by operating continuously.</p> <p>Request for bus lanes within the County.</p>	<p>0123 0288</p>	<p>Manager's Response The operation of bus routes is not within the remit of the Development Plan. Under 2.2.8 the Draft Development Plan states the Council recognises the requirement to install Quality Bus Corridors (QBC) and the need to provide additional buses to serve these.</p> <p>Manager's Recommendation No change recommended.</p>

<p>Section 2.2.8 and Table 2.2.1: Should state that the list of the QBC network within the County is non-exhaustive and that additional schemes may be progressed during the lifetime of the Plan.</p> <p>Likely that Quality Bus Network Projects schemes additional to those set out in the Draft (Section 2.2.8, Table 2.2.1) could be implemented - important to state "This list is non exhaustive and additional schemes may be progressed should they be identified as part of a high quality network of public transport within SDCC".</p>	<p>0036</p> <p>0029</p>	<p>Manager's Response Appropriate amendments should be made in the interest of clarity.</p> <p>Manager's Recommendation Amend Section 2.2.8 by inserting the following at the end of the second paragraph: The list of routes in the QBC network within the County is non-exhaustive and additional schemes may be progressed during the lifetime of the Plan.</p>
<p>It should be noted that the provision, operation and funding of public transportation infrastructure such as bus priority lanes are outside the remit of the NRA.</p>	<p>0008</p>	<p>Manager's Response It is noted that bus priority lanes have already been provided and are likely to continue to be provided along National Routes.</p> <p>Manager's Recommendation No change recommended.</p>
<p>The Development Plan should deal with the misguided policy of setting aside large portions of scarce public roads to provide bus corridors that are either underutilised or not used at all.</p>	<p>0123</p>	<p>Manager's Response Affecting a modal shift from the private car to more sustainable modes of transport is proposed as a strategy of the draft development plan.</p> <p>The provision of bus priority is an important part of the overall strategy of improving public transport, which is a key goal for the Development Plan. Providing for future public transport is also an important aim of the plan. This requires us to construct bus lanes before significant future congestion occurs, rather than retrofitting bus lanes on a congested network.</p> <p>Section 2.2.8 of the Draft Development Plan states "The Council recognises the requirement to install Quality Bus Corridors (QBC) and the need to provide additional buses to serve these."</p> <p>Manager's Recommendation</p>

		No change recommended.
Request for the provision of more bus shelters on the streets.	0288	<p>Manager's Response The upgrading of bus shelters is a matter for Dublin bus. Bus shelters are generally installed where Quality Bus Network schemes are implemented.</p> <p>Manager's Recommendation No change recommended.</p>
The areas served by the Heuston/Kildare line are growing rapidly. A key future objective is to accommodate a peak hour service pattern of 4 commuter, 4 regional and 4 intercity services. The project will also facilitate higher density developments along the corridor according to local authority land use objectives. Construction commenced mid 2007 and is expected to be completed by 2010.	0147	<p>Manager's Response Comments noted.</p> <p>Manager's Recommendation No change recommended.</p>
Request Public Transport Policy, with off-street dedicated public transport hubs, now - not in 20 years.	0123	<p>Manager's Response A considerable number of the policies of the Draft Development Plan directly relate to public transport including:</p> <p>Policy T1 Sustainable modes of transport Policy T3 Transport 21 and Dublin Transportation Office Strategy Policy T4 Quality Bus Network Policy T5 and T6 Luas and Light Rail Transit (LRT) Extension Policy T7: Metro Railway System Policy T8 Interconnector Tunnel Policy T9 Public Transport Links to Rural areas Policy T10 Pilot School Bus Service</p> <p>A public transport hub has recently been approved in a planning application for Liffey Valley Town Centre Development.</p>

		<p>Manager's Recommendation No change recommended.</p>
<p>On completion of details of final alignment of preferred route of Lucan Luas alignment should be reserved and illustrated on Development Plan maps.</p>	0042	<p>Manager's Response Section 2.2.11.i should be amended as requested.</p> <p>Manager's Recommendation Amend Section 2.2.11.i to insert the following: " and to reserve the final alignment of the preferred route when it has been agreed."</p>
<p>An extension of the Luas to Kiltipper along the Sean Walshe park should be considered, to improve public transport in the area and also to/from the county town. There needs to be a strategy to upgrade all older bus routes in Tallaght South with bus shelters similar to newer routes.</p>	0139	<p>Manager's Response All extensions of existing Luas lines are planned by the RPA. The upgrading of bus shelters is a matter for Dublin Bus, however, South Dublin County Council in conjunction with the QBNPO promotes the upgrading of all existing bus stops on QBC routes. These upgrades included new bus shelters and Kassel kerbing to allow mobility impaired to access the buses.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Corridor for Metro West should now be reserved and protected- route is fixed, reference design nearing completion.</p>	0042	<p>Manager's Response The preferred route is indicated on the relevant draft Development Plan maps.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Our objective under Transport 21 to build an Interconnector tunnel through Dublin city centre. It is intended that this will facilitate in the future the through running of commuter services between the south-west rail corridor and the northern line. This will have a major benefit to existing and potential rail customers in South Dublin.</p>	0147	<p>Manager's Response Comments noted.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Cycling and Walking</p>		

<p>Recommends that a countywide cycle network be developed.</p> <p>Request for cycle lanes within the County.</p> <p>Would like provision to be made for cyclist movement between the villages of Saggart, Rathcoole, Newcastle, Clondalkin and Lucan.</p>	<p>0098</p> <p>0288</p> <p>0107</p>	<p>Manager's Response A countywide cycle network is being developed as part of the Green Routes policy as detailed in Section 2.2.14 and Table 2.2.2 of the Draft Plan, to be implemented subject to the availability of appropriate approval and finance. The Green Routes policy has a network of proposed cycle routes linking the main villages in the County.</p> <p>Manager's Recommendation No change recommended.</p>
<p>There are too many off road cycle tracks proposed for local roads, where footpaths are narrower and conflict with pedestrians is more likely.</p>	<p>0158</p>	<p>Manager's Response The physical separation of cyclists and motorists, by use of off-road cycle tracks, is the preferred option for both cyclists and motorists using the road network. It is important that conflicts between these are limited, but not at the expense of conflicts with pedestrians. Each proposed cycle route is judged on its merits, and subsequent designs generally reflect the best use of available space, taking both footpath and road widths into account. The overriding design criterion is always safety.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Request the introduction of free bicycles similar to those provided within Dublin City.</p>	<p>0288</p>	<p>Manager's Response The Council is aware of the success to date of the Dublin Bike scheme. A feasibility study for the funding and implementing of a bicycle scheme has begun. A report with Manager's Recommendations will likely be brought to the Transport SPC for consideration. The study is in its early stages and this scheme cannot be considered for inclusion in the Development Plan at this point.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Section 2.2.14 Walking and Cycling</p> <ul style="list-style-type: none"> • Section 2.2.14 should be expanded and other County Development Plans should be used to review the expansion. • In 2nd paragraph the following should be added: 	<p>0018</p>	<p>Manager's Response It is not clear what is meant by the expansion of this paragraph. Generally footpaths will always have a kerb where located on a road. In general the policy is to provide off-road cycle tracks, however in some cases this may be unachievable due to the road width, presence of driveways etc.</p>

<p>'providing they are protected by a kerb'. • In penultimate paragraph the following should be the first point: ' In view of the obesity and diabetes crises'</p>		<p>Manager's Recommendation No change recommended.</p>
<p>Support for Policy/Section 2.2.14. Support given for policies that promote permeable pedestrian and cyclist networks.</p>	<p>0018 0098</p>	<p>Manager's Response Comments noted. Manager's Recommendation No change recommended.</p>
<p>New developments should include cycle routes that are linked into the cycle route network.</p>	<p>0284</p>	<p>Manager's Response Where possible and appropriate, the requirement to provide/consider walking and cycling facilities is considered as part of any planning application assessment. Manager's Recommendation No change recommended.</p>
<p>Electric Transportation</p>		
<p>Request the removal of Policy T15 until consultation takes place with convenience retailers. The implementation of the Electric Transportation Programme should not impact upon the operation requirements of retailers.</p>	<p>0250</p>	<p>Manager's Response Policy T15 is a key part of the promotion of non-car based transport and therefore should be included. The Electric Transportation Programme is unlikely to impact on the operation of retailers but will only effect the planning and construction stages. Manager's Recommendation No change recommended.</p>
<p>Request that the Plan makes provision for electrical cars in the future.</p>	<p>0288</p>	<p>Manager's Response Infrastructure is required to facilitate the shift to electric vehicles. Provision has been made in the Draft Development Plan for this. Policy T15 of the Draft Development Plan states: It is the policy of the Council to support the Government's Electric Transport Programme by facilitating the roll-out of charging infrastructure for electric vehicles through the planning system.</p>

		<p>Manager's Recommendation No change recommended.</p>
Park and Ride		
Park and ride sites at Lucan N4 and N7 should only be implemented in accordance with an agreed and co-ordinated strategy for the provision of park and ride sites between all stakeholders including the NRA.	0008	<p>Manager's Response Comments noted.</p> <p>Manager's Recommendation No change recommended.</p>
Propose a new Park and Ride Facility beside Browns Barn, Baldonnell. This proposed Park and Ride facility satisfies that part of the draft plan as the location is beside the Browne's Barn Premises with potential immediate access to the City West interchange approaching from the Baldonnell side.	0026 0259	<p>Manager's Response As indicated in Table 2.2.3 a Park and Ride facility is proposed in this general area. The assessment of any particular development proposal is a development management operational matter.</p> <p>Manager's Recommendation No change recommended.</p>
Proposes the construction of a park & ride site at Saggart.	0281	<p>Manager's Response A proposed park and ride facility is indicated in Table 2.2.3 to be facilitated in conjunction with a LUAS City West station at Garter Lane, Saggart.</p> <p>Manager's Recommendation No change recommended.</p>
RPA welcome opportunity to discuss policy T18 Park and Ride further.	0042	<p>Manager's Response Comment noted.</p> <p>Manager's Recommendation No change recommended.</p>
Road Safety, Traffic, and Parking		

<p>It is recommended that Traffic and Transport Assessment Guidelines (TTA) and also the Road Safety Audit process which is detailed in the NRA's DMRB are referred to in the Text.</p>	<p>0008</p>	<p>Manager's Response As part of the planning process it is the requirement that a TTA and Road Safety Audits are carried out on significant developments, and as such this does not need to be included in the text.</p> <p>Manager's Recommendation No change recommended.</p>
<p>The extension of street lighting from Newcastle village to Greenogue.</p> <p>Request installation of CCTV cameras on Kennelsfort Road to ensure enforcement of the 3 tonne limit.</p> <p>Request provision of a lighted junction at Hillcrest Road and Adamstown Road Newcastle intersection.</p>	<p>0281</p>	<p>Manager's Response These are operational matters outside the remit of the Development Plan.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Proposes the implementation of a HGV ban on the main Newcastle / Adamstown Road through Lucan.</p>	<p>0281</p>	<p>Manager's Response This is an operational matter outside the remit of the Development Plan. The enforcement of a HGV ban is a matter for the Gardai.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Roads are a great source of noise pollution and in relation to same we would like to draw attention to the SEA Environmental Report prepared for the Draft Plan section 3.2.11 Human Health Issues: Existing Problems / Environmental Considerations.</p>	<p>0154</p>	<p>Manager's Response The issue of noise pollution is addressed in Section 2.4.27 of the Draft Plan. This refers to the Action Plan forming part of a report by the four Dublin local authorities, entitled the Assessment of Environmental Noise for the Dublin Agglomeration 2008-2013, which was prepared in accordance with the EU Directive 2002/49/EC.</p> <p>Manager's Recommendation No change recommended.</p>

<p>Request traffic management plans for Palmerstown, Lucan and Rathcoole.</p>	<p>0281</p>	<p>Manager's Response Specific local area traffic management plans are not a matter for the development plan, as they are a local area issue. However it should be noted that a traffic management plan was prepared for the Lucan area and Manager's Recommendations were made and brought to the Lucan- Clondalkin ACM on 16th January 2008. A bypass has been proposed as a long term road objective for Rathcoole village. Specific Local Objective No. 9 is an objective to prepare a local planning study for the Palmerstown Area.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Request that a park safe strategy devised by Lucan Educate Together be used as a model for a County wide road safety campaign outside schools.</p>	<p>0281</p>	<p>Manager's Response The Council has been impressed by the success of this scheme. The Council has agreed, within available resources, to continue to work further to develop partnership arrangements. While the scheme has been successful, it requires a large commitment from the school management and parents and so it is not appropriate to impose it as policy on all schools.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Request that car parking spaces be reserved to cater for the trips generated by individual units. Electric vehicle charging spaces should be in addition to the Development Plan maximum parking requirement.</p>	<p>0250</p>	<p>Manager's Response It is considered that detailed arrangements in this regard are more appropriate to be addressed as development management operational matters.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Request that there will not be a policy to extend pay for parking to outside of the village areas.</p>	<p>0245</p>	<p>Manager's Response Parking provision is considered on a case by case basis and often at the request of residents who have problems with long term parking in their estate. It is not considered feasible to give the commitment requested, nor is it an appropriate development plan matter.</p>

		<p>Manager's Recommendation No change recommended.</p>						
<p>Recommend that a new policy be inserted after Policy T29 of the Draft Development Plan that the Planning Authority will positively consider the piloting of car-free developments at locations served by high quality public transport.</p>	0255	<p>Manager's Response It is considered that the use of a car is the important measure to discourage, rather than the ownership of a car. Cars will still be required especially for certain tasks such as weekly grocery shopping. The concern is that car free developments will become undesirable places to live or work.</p> <p>Manager's Recommendation No change recommended.</p>						
<p>Recommends that parking should be spatially defined, using an area based approach to allow for a consistent implementation of parking policy in the County.</p>	0098	<p>Manager's Response On further examination of the parking standards applying to retail development in the Draft Development Plan, it is considered that the relevant standards should be revised. The revised standards set out below take account of whether the gross floor area of a proposed store is under or over 1000m², and its location in relation to public transport corridors. The revised standards reflect the recommendations of the Dublin Area Travel Demand Management Study (DTO November 2005). In this regard it is noted that the DTO recommend that it is appropriate to apply more restrictive maximum standards in the Metropolitan area of the GDA than in the region generally, and the revised standards reflect this recommendation. It is considered, therefore, that the standard of 1 space per 14m² gross floor area for Retail-Food is not appropriate to locations within the Metropolitan area of the GDA.</p>						
<p>Request that Policy T29 be amended to reflect the content of the Retail Planning Strategy for the GDA, 2008-2016 with regards to the necessity to use private car.</p>	0250							
<p>Request that maximum car parking standards not be applied to convenience foodstores located proximate to public transport facilities.</p>	0250							
<p>Request that the Plan recognise that certain retail formats require surface car parking.</p>	0250							
<p>Request for a review of the car parking standards within the Draft Plan in relation to Food – Retail use. In particular requests that the Plan incorporates a car parking standard of 1 space per 14m² gross floor area for Retail-Food.</p>	0250							
		<p>Manager's Recommendation (1) Amend Section 2.2.34 to insert the following additional table and (2) amend Table 2.2.4 to omit Retail Centres and Retail Stores.</p> <p>Parking Standards Relating to Retail Uses</p> <table border="1"> <thead> <tr> <th></th> <th>Public Transport Corridors</th> <th>General</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> </tr> </tbody> </table>		Public Transport Corridors	General			
	Public Transport Corridors	General						

		Land Use	<1000m ²	>1000m ²	<1000m ²	>1000m ²
		Retail - Food	1 space per 40m ² gross floor area	1 space per 25m ² gross floor area	1 space per 25m ² gross floor area	1 space per 20m ² gross floor area
		Retail – Comparison only	1 space per 40m ² gross floor area	1 space per 40m ² gross floor area	1 space per 25m ² gross floor area	1 space per 25m ² gross floor area
		Retail - Shopping Centres & Stores (including Food)	1 space per 40m ² gross floor area	1 space per 25m ² gross floor area	1 space per 25m ² gross floor Area	1 space per 20m ² gross floor area
Parking Standards Relating to Retail Uses						
Suggest amend Note 2 to Table 2.2.4 to require minimum parking bay widths to exclude any structural pillars and other obstacles.	0158	<p>Manager's Response Agree that the Development Plan should be amended to reflect this.</p> <p>Manager's Recommendation Amend Section 2.2.34 to revise footnote (2) to Table 2.2.4 to read as follows: All parking bays in surface and multi-storey or basement parking areas (other than those reserved for disabled persons) shall be 2.5m in width and 4.74m in length, exclusive of any structural pillars and other obstacles.</p>				
Part of the original Naas Road, which is now	0106	Manager's Response				

<p>fenced off and closed as a public road leading to the N7, should be retained in County Council ownership and developed for off-street public car parking, as currently there effectively is no off-street public car parking for visitors to Kingswood Village.</p>		<p>The Old Naas Road has been retained in Local Authority ownership. Currently there is no restriction on parking on this section of the Naas Road.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Roads Objectives</p>		
<p>Roads Objectives – General</p>		
<p>NRA is not likely to be responsible for the financing of other projects included in Tables 2.2.5 and 2.2.6 as these are not an NRA priority.</p>	<p>0008</p>	<p>Manager's Response Comments noted.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Six Year Roads Objectives – Table 2.2.5 Regional / District</p>		
<p>Request that the re-alignment of the Knocklyon Road be carried out within the lifetime of the Plan as increasing problems such as traffic volumes, congestion, inadequate lighting and traffic signal sequencing have made the realignment urgent. Works to include:</p> <ul style="list-style-type: none"> • Chicane the Knocklyon Road at the junction with the Firhouse Road. • Installation of speed ramps and traffic calming systems • Provide large speed limit signs • Reduce speed limit to 30Kph • Provide a pedestrian crossing at the garage shop. 	<p>0256 0263 0264 0265 0266 0267 0268 0269 0270 0271 0272 0273 0274 0275 0276</p>	<p>Manager's Response Neither the acquisition of land for this road or its construction are eligible for grant funding from Central Government and thus the responsibility falls solely to the Council to provide the monies required. With the current economic situation and subsequent decline both in the number of planning permissions being lodged and ongoing development, the Council has seen a substantial reduction in the funding sources available to them. Knocklyon Road improvement continues to be a priority and will be constructed as soon as resources permit.</p> <p>It is not clear as to what is proposed/intended in the suggestion to "chicane the Knocklyon Road at its junction with the Firhouse Road". However the elimination of the slip lanes and filter lanes at this junction will not be possible as these facilities are necessary for the safe and efficient operation of the junction, both now and in the foreseeable future</p>

	<p>0277 0278</p>	<p>The Installation of a Traffic Calming scheme on the existing Knocklyon Road would, of necessity require a Part 8 Procedure in accordance with the requirements of Part 8 of the Local Government (Planning and Development) Regulations 2000/2001 which would entail a Public Display of any Proposed Works and a subsequent Public Consultation Process (including redesign works) and then submission to the Council Members for their approval. The design of such a scheme would be highly problematic, given the large traffic volumes utilizing the existing road(>11,000 Vehicles Per Day), the large number of individual domestic entrances in addition to the multiple access points necessary to cater for the various estates which discharge traffic on to the Knocklyon Road in this vicinity. In addition the use of Speed Ramps would not be possible due to the presence of an existing bus route along the road. In addition funding for such a scheme would have to be drawn from the Council's own resources. Again, committed expenditure, on other approved schemes around the County, in terms of contract expenditure and land acquisition must take precedence.</p> <p>The erection of additional signage, even if warranted, on Firhouse Road, would have no impact on driver behaviour/speed on Knocklyon Road.</p> <p>The use of 30KPH speed limits on public roads in South Dublin is typically restricted to areas adjacent to schools. It should further be noted that a review of speed limits on the County's roads was undertaken in 2009 and 50 KPH was identified as the appropriate speed limit for the Knocklyon Road.</p> <p>The installation of pedestrian traffic signals at the Garage/Shop on Knocklyon Road had been previously examined by the Council's Traffic Department, and pedestrian traffic at that location did not warrant the installation of pedestrian signals.</p> <p>Manager's Recommendation No change recommended.</p>
<p>States that the residents of Ambervale are watching to ensure that the Cookstown Road will have its slip road at Cairnwood for the residents of St Marks Parish.</p>	<p>0025</p>	<p>Manager's Response New roads in the County go through due Planning Process with opportunities for local residents to comment. There is a link provided to the Embankment Road from Fettercairn Road. The future design for the road is available on the Council website.</p>

		<p>Manager's Recommendation No change recommended.</p>
Request that any further detail on the alignment or design of the link road proposed from Adamstown SDZ to the Celbridge Road (Table 2.2.5) is carried out in consultation with the OPW as the indicative alignment appears to affect Backweston Farm- managed by the OPW- to ensure the ongoing activity of the farm and associated laboratories are not negatively affected by the road	0095	<p>Manager's Response Comments noted.</p> <p>Manager's Recommendation No change recommended.</p>
Six Year Roads Objectives – Table 2.2.5 Local		
It is unclear whether the final four Local Roads mentioned in Table 2.2.5 Six Year Road Objectives are new or extended roads. Request that the Council publish detailed maps of these roads, as they are planned to run through sections of the Dodder valley.	0102	<p>Manager's Response The Development Plan can only give indicative routes on maps for future road schemes, as the detailed designs for these schemes have not yet been prepared.</p> <p>Manager's Recommendation No change recommended.</p>
Propose that Rathcoole Distributor and Relief Roads and associated interchanges with the N7 as a Specific Local Objectives should be removed.	0105 0137 0138 0144	<p>Manager's Response A Part 8 was proposed to the Council for the Rathcoole/Saggart distributor Road – Fitzmaurice Road to Keatings Park N7 junction to Boherboy road. On 10th July 2006 the Council approved a section of this Part 8 from the GAA lands to the tie in at Keating's Park. The remainder of the proposal, including the section in Rathcoole Park and the Saggart Relief Road, was eliminated from the part 8 pending a further study to be carried out on completion of the Naas Road works and Phase 3 of the Outer Ring Road. Although these roads are now completed, this study has not been carried out yet. When this study has taken place the remainder of the proposed road will be reviewed.</p> <p>This route is proposed in the development plan to alleviate traffic problems in the</p>

		<p>villages of Rathcoole and Saggart.</p> <p>Rathcoole – Keating’s Park – Interchange is a Specific Local Objective where the feasibility of putting an interchange on the N7 at this location in Rathcoole is to be investigated. The interchange is being considered as the Rathcoole Interchange east of Keating’s Park is at capacity and the interchange at Steelstown west of Keating’s Park has limited traffic capacity.</p> <p>Manager’s Recommendation No change recommended.</p>
In favour of the ‘Barton Road East extension to Grange Road’ proposal.	0013	<p>Manager’s Response Comment noted.</p> <p>Manager’s Recommendation No change recommended.</p>
Welcome the retention of a roads objective to provide road between Barneys Lane and the Citywest Interchange.	0129	<p>Manager’s Response Comment noted.</p> <p>Manager’s Recommendation No change recommended.</p>
Long Term Roads Objectives – Table 2.2.6 Regional / District		
<p>Rathcoole – Keating’s Park – Interchange should be removed.</p> <p>That the need for an interchange at Keatings Park Rathcoole be re-examined.</p>	<p>0105 0137 0138 0144 0281</p>	<p>Manager’s Response Rathcoole – Keating’s Park – Interchange is a Specific Local Objective where the feasibility of putting an interchange on the N7 at this location in Rathcoole is to be investigated. The interchange is being considered as the Rathcoole Interchange east of Keating’s Park is at capacity and the interchange at Steelstown west of Keating’s Park has limited traffic capacity.</p> <p>Manager’s Recommendation No change recommended.</p>

<p>States concern with a number of the long term roads objectives. In particular a justification needs to be provided within the Draft Development Plan for the extensive road network proposed in the west of the County as none of these schemes seem to have related development objectives. These roads should be subject to evaluation against the criteria set out in current government transport policy (Department of Transport's Smarter Travel – A Sustainable Transport Future)</p>	<p>0098</p>	<p>Manager's Response South Dublin County Council needs a comprehensive network of long term road and public transport proposals. This proposal reflects a sustainable and balanced long term transport policy.</p> <p>Manager's Recommendation No change recommended.</p>
<p>The long term road proposal indicated on the maps to cross the Liffey Valley pNHA is of concern, as the pNHA is a wildlife corridor and an important site for biodiversity including protected species and rare plants. This long term road proposal also crosses the Grand Canal and has the potential to impact on two watercourses which are important wildlife corridors. They are likely to contain otters and bats which are listed on Annexe IV of the Habitats Directive, and this issue should be assessed in the SEA.</p>	<p>0164 0283</p>	<p>Manager's Response The alignment of the road was raised in the scoping submission by the DoEHLG. Taking into account the submission, the sensitivities contained therein and the potential for significant negative impact of the western road on receiving environments, mitigation in the form of SLO 33 was required to be inserted into the Draft Development Plan. This SLO requires that the road shall be subject to a sustainability assessment in order to ascertain the need for the project, and in the event of the road being approved by the sustainability assessment, an EIA requiring full examination of alternative alignments will be required, with particular attention to be paid to potential for impact upon the Grand Canal. It is considered that these mitigation measures will ensure that the need for the road would first be required to be established, while any road alignment would be carefully considered for environmental impacts on habitats and species in addition to landscape and other impacts.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Object strongly to the location of the proposed road linking Bohernabreena and Kiltipper</p>	<p>0113 0114 0181 0182 0183</p>	<p>Manager's Response South Dublin County Council needs a comprehensive network of road and public transport proposals. This proposal reflects a sustainable and balanced transport policy.</p>

	0184 0185 0186 0188 0189	Manager's Recommendation No change recommended.
The existing R120 is substandard and the proposed upgrade is indicated to be a long-term objective. SDCC must be held to account if this proposed industrial area is allowed access to the existing R120. A connection should be made to the underused roads in the Grange Castle Business Park to facilitate traffic between Adamstown to GCBP and shorten journeys for GCBP workers.	0131	Manager's Response The R120 is a regional route and is an important link between the industrial areas around Grange Castle and the N4. It is proposed to upgrade this road as a long term road objective. Grange Castle Business Park currently has two entrances to the surrounding road network, one on the Outer Ring Road and one on the Nangor Road. A third entrance to Grange Castle is to open on to the proposed Nangor Road extension at a location just east of the R120. This is considered adequate access at this time. Manager's Recommendation No change recommended.
The heritage and environmental importance of the 12 th lock canal bridge can only be realistically preserved if the R120 is re-routed to a less sensitive location.	0131	Manager's Response It is a Specific Local Objective of the Council (SLO 28) to retain and protect the character of the 12 th Lock Canal Bridge, which is a Protected Structure (RPS 127). This SLO will be considered in the Environmental Impact Report when the proposed realigned R120 is designed. Any proposed route and design of the road is subject to public inspection and comment through the planning process. Manager's Recommendation No change recommended.
Long Term Roads Objectives – Table 2.2.6 Local		
Request removal of the roads objective on Whitechurch Road immediately adjacent to the western wall of St Enda's Park in line with the	0122	Manager's Response It is likely that Whitechurch Road will be traffic calmed in the first instance as per the Part 8 proposal submitted to the Council September 2009 that was approved at the

<p>omissions of the links to the north and south in previous development plans.</p>		<p>November 2009 County Council Meeting. This may change the need for realigning the road as per the long term road objective.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Concern regarding proposed new Local Road – Oldcourt LAP</p>	<p>0187</p>	<p>Manager's Response This road objective relates to the proposed West Oldcourt Local Area Plan which is in preparation, and will be subject to the required public consultation procedure in due course when the draft LAP is finalised.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Remove Long Term Road Proposal Table 2.2.6 - Esker Lane to Esker Meadow View, Lucan</p>	<p>0010 0053 0054 0055 0057 0094 0096 0097 0143 0149</p>	<p>Manager's Response At this time Esker Meadow View is a cul de sac. This requires parents dropping children to Gaelscoil Naomh Pdraig to enter the cul de sac turn the vehicle and exit by the same road. Completing a link to Esker Lane would bring a through road where there would be two ways to access the school and a second access for emergency services. As Esker Lane is no longer linked to the N4, this road would likely be utilised by local traffic only and increase permeability through the area for locals. Any proposal for this area will include calming and school set down parking and will provide a more permeable and pedestrian friendly environment.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Proposed New Road Objectives</p>		
<p>Improve the road safely and sight lines on the Edmondstown Road at the Tibbradden Road junction and at the entrance to Rockbrook Park School in cooperation with the latter. (attached map)</p>	<p>0132 0231</p>	<p>Manager's Response It is not appropriate for a road safety proposal to be included in the Development Plan. However this request will be submitted for consideration to the low-cost safety scheme section.</p>

		<p>Manager's Recommendation No change recommended.</p>
<p>Requests a new road objective to link Woodstown Estate with Stocking Avenue to alleviate traffic congestion in the Ballycullen Area.</p>	0003	<p>Manager's Response It is appreciated that there has been difficulties with residents exiting Woodstown Estate. However, it is considered that providing an access on to Stocking Lane would only increase significantly the amount of rat running traffic through the estate. The main problem is that the roundabout at the junction of Killinenny Road and Ballycullen Road is being dominated by the east-west arms allowing little priority for north-south arms. There is a QBC scheme in construction in which the roundabout is to be signalised. This will allow for the fairer allocation of priority to individual arms.</p> <p>Manager's Recommendation No change recommended.</p>
<p>The Outer Ring Road should be extended northward and a new Liffey crossing provided as a free alternative to the tolled M50 in line with EU regulations.</p>	0131	<p>Manager's Response Any further crossing of the Liffey will require careful and detailed consideration in light of the serious environmental issues and wider regional road network requirements. It is unlikely that the Government would provide the funding of such a bridge over the Liffey in contravention of its overall roads plan.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Propose new Local Roads objectives providing for: - the upgrade of Knockmeenagh Lane to a local Distributor Road; and - a link road connecting Knockmeenagh Lane to Monastery Road, as indicated in the Monastery Road Development Brief, via the existing roundabout on Monastery Road.</p>	0169	<p>Manager's Response Knockmeenagh Lane is primarily a local road and as such is neither suitable nor desirable to upgrade it to a distributor road or to link it to the Woodford Hill roundabout.</p> <p>Manager's Recommendation No change recommended.</p>
<p>That provision be made to re-open and make safe Tandy's Lane Lucan and Tay Lane Newcastle</p>	0281	<p>Manager's Response The link from Tandy's Lane to the N4 was shut to traffic, excepting buses and</p>

		<p>bicycles, in September. The link was shut as it is considered that there is insufficient weaving distance between this merge and the succeeding diverge lane. This insufficient weaving distance was causing a road safety problem. There are no plans to reopen it to general traffic at this time.</p> <p>The link from Tay lane to the N7 has been restricted to a left turn only on to the Rathcoole Interchange for safety reasons. There is insufficient weaving distance between the merge lane from Tay Lane to the N7 diverge lane to the Rathcoole Interchange causing a road safety issue. Vehicles accessing the N7 can do so from the Interchange.</p> <p>There is a Specific Local Objective (SLO 59) to provide for an easy-flow exit from the N7 (Naas Road) at its junction with Tay Lane. There is no indication at this time what form this junction may take.</p> <p>Manager's Recommendation No change recommended.</p>
<p>West Circular Route should be added to the CDP as an objective</p>	<p>0105 0137 0138 0144</p>	<p>Manager's Response There is already a proposed western link from the N7 to the Celbridge Road.</p> <p>Manager's Recommendation No change recommended.</p>

6.4.2 Water Supply and Drainage

Issue	Sub. No.	Manager's Response and Manager's Recommendation
Water & Drainage		
Section 2.3.4 should be expanded to include a clear strategy on the need for mandatory water harvesting and that a specific supportive policy is included in the plan.	0100	<p>Manager's Response This is adequately addressed in the Council's Specification for the Laying of Watermains and Drinking Water Supply.</p> <p>Manager's Recommendation No change recommended.</p>
The SEA and Plan making processes should address drinking water supply capacity, leakage and quality in the Plan area in the context of current drinking water supply and future requirements. This is of particular relevance in the context of the two proposed SDZ areas.	0254	<p>Manager's Response This is addressed in the Proposed Dublin Region Water Services Strategic Plan referred to in 2.3.6.i.</p> <p>Manager's Recommendation No change recommended.</p>
The Plan should implement the European Communities (Drinking Water)(No.2) Regulations 2007 and should implement and include, as appropriate, the relevant Manager's Recommendations set out in The Provision and Quality of Drinking Water in Ireland – A Report for the Years 2007- 2008, (EPA, 2009). Consideration should also be given to the incorporation of and reference to, the Pea's recent Drinking Water Advice Notes 1 – 5 where appropriate and relevant for South Dublin.	0254	<p>Manager's Response Reference is made to the Regulations and the report for the years 2006-7 in Section 2.3.5 of the Draft Plan. This should be updated as suggested. A reference to the advice notes can also be inserted in this section.</p> <p>Manager's Recommendation Amend Section 2.3.5 to:</p> <ol style="list-style-type: none"> (1) insert "The Provision and Quality of Drinking Water in Ireland – A Report for the Years 2007- 2008, (EPA, 2009)" in place of the outdated title to the report, and (2) insert the following at the end of the first paragraph: "The council will have regard to the Drinking Water Advice Notes 1 – 5 (EPA) where appropriate and relevant for South Dublin."

<p>The Plan should include a specific objective requiring the development by the local authority, in association with relevant key stakeholders, of an “Integrated Phase Implementation Plan / Programme for Critical Water, Surface Drainage and Waste Water related infrastructure” to service the SDZ areas of Adamstown and Clonburris. Such a Plan/Programme should take into account the Phasing of the development of the SDZ areas and the vulnerability/Water Framework Directive Risk Categories of the receiving waters in the zone of influence of the SDZ areas and the water and wastewater related infrastructure servicing these areas. The proposed implementation and phasing of the SDZ areas should also take into account any revisions to population/targets likely to be allocated via the Regional Planning Guidelines currently under review.</p>	<p>0254</p>	<p>Manager’s Response This is catered for in the respective Planning Schemes for Adamstown and Clonburris.</p> <p>Adamstown and Clonburris Strategic Development Zones were designated under an Act of Oireachtas. Detailed Planning Scheme Documents (which are statutory documents) indicating development type and extent, design, transportation infrastructure, provision of services on the site, proposals to minimise the effects of development and the amount of community facilities required to serve development were detailed in the Planning Schemes, which went through substantive public consultation and An Bord Pleanala Oral Hearing Processes. Each Planning Scheme carefully phased development to take place in tandem with or ahead of development. Strategic Development Zones operate independently of the Development Plan, however development would be cognisant of environmental constraints and bound by issues contained within the Water Framework Directive</p> <p>Manager’s Recommendation No change recommended.</p>
<p>The Plan should, where possible and appropriate, include specific Policies and Objectives regarding the provision and maintenance of adequate and appropriate wastewater treatment infrastructure to service lands within the Plan area.</p>	<p>0254</p>	<p>Manager’s Response Section 2.3.27.ii Specific Objectives – Foul Drainage, provides for upgrading of the Dodder Valley Foul Sewer and Greater Dublin Drainage 9B collection systems in accordance with the prevailing Water Services Investment Programme.</p> <p>Manager’s Recommendation No change recommended.</p>
<p>Consideration should be given to addressing capacity issues at Ringsend and include a specific policy to take account of the findings of the “Greater Dublin Strategic Drainage Study” as appropriate for South Dublin.</p>	<p>0254</p>	<p>Manager’s Response Capacity constraints in the wastewater collection and treatment system in the GDA are acknowledged in Section 2.3.2. The Council’s policies in regard to addressing these constraints are set out in Policies WD1 (section 2.3.6.i), and Policy WD2 (section 2.3.8.i).</p>

		<p>Manager's Recommendation No change recommended.</p>
<p>Reference should be made to the updated Urban Waste Water Discharges in Ireland for Population Equivalents Greater than 500 Persons – A Report for the Years 2006 and 2007, (EPA 2009), and compliance with the Manager's Recommendations as relevant and appropriate to South Dublin.</p>	0254	<p>Manager's Response The reference to the report in the Draft Plan requires to be updated.</p> <p>Manager's Recommendation Amend Section 2.3.8.i to replace "2004-2005 (2007)" with "2006-2007 (EPA 2009)"</p>
<p>The Plan should refer to the requirement under The Waste Water Discharge (Authorisation) Regulations for all wastewater discharges, including storm water discharges, which come within the scope of these Regulations to be licensed.</p>	0254	<p>Manager's Response A reference to this requirement Should be inserted in the Draft Plan.</p> <p>Manager's Recommendation Amend Section 2.3.8.i to insert the following at the end of the final paragraph: The wastewater collection system in South Dublin is subject to the Waste Water Discharge (Authorisation) Regulations. Dublin City Council acts on behalf of South Dublin County in regard to obtaining the relevant licence from the EPA.</p>
<p>The Plan should take into account the objectives and management practices proposed by the Dublin Bay Master Plan and the Coastal Zone Management Plan, where relevant and appropriate, once it is completed.</p>	0254	<p>Manager's Response A reference to these plans can be inserted in the Draft Plan.</p> <p>Manager's Recommendation Amend Section 2.3.8.i to insert the following: It is an objective of the Council to have regard, when they are adopted, to the objectives and management practices proposed by the Dublin Bay Master Plan and the Coastal Zone Management Plan, where relevant and appropriate.</p>
<p>The Plan should take account of any Groundwater Protection Schemes and Groundwater Source Protection Zones data available at the Geological Survey of Ireland.</p>	0254	<p>Manager's Response Groundwater issues are addressed in Sections 2.3.9, 2.3.10, 2.3.11, and 2.3.12 of the Draft Plan.</p> <p>Manager's Recommendation No change recommended.</p>

<p>The Bohernabreena Reservoir and the Rivers Dodder and Liffey are exceptional in the area with regards to supporting Atlantic salmon and therefore should be protected and the Plan should make clear that salmonid waters constraints apply to any development in this area.</p>	<p>0257</p>	<p>Manager's Response An appropriate amendment in this regard should be inserted in the Draft Plan.</p> <p>Manager's Recommendation Amend Section 2.3.9 to insert the following: It is an objective of the Council to ensure that salmonid waters constraints are applied to any development in the Liffey and Dodder river catchments, including Bohernabreena Reservoir, which are recognised to be exceptional with regard to supporting salmonid fish species.</p>
<p>The Fisheries Board requests the designation of lands adjacent to surface waters, particularly salmonid systems as areas of open preservation. An undisturbed buffer zone between development area and river bank should be maximised.</p> <p>Request that best management practice should be implemented at all times in relation to any activities that may impact on riverine or riparian habitats. Any planned discharges to surface streams must not impact negatively on the salmonid status of the system. The design and construction of any surface water outfall chambers to rivers should be implemented in an ecologically sound and fisheries-sensitive manner. The use of concrete (or other toxic materials) at riparian and in-stream locations should only occur in the dry to prevent contamination of adjacent surface waters.</p>	<p>0257</p>	<p>Manager's Response An appropriate amendment in this regard should be inserted in the Draft Plan.</p> <p>Manager's Recommendation Amend Section 2.3.9 to insert the following after the first paragraph: It is an objective of the Council that undeveloped lands adjacent to surface waters, particularly salmonid river systems, be retained in their open natural state in order to prevent habitat loss and aid in pollution detection, while providing open space and recreational amenity for river users.</p> <p>Best management practice shall be implemented at all times in relation to any activities that may impact on riverine or riparian habitats. Any planned discharges to surface streams shall not impact negatively on the salmonid status of the system. The design and construction of any surface water outfall chambers to rivers shall be implemented in an ecologically sound and fisheries-sensitive manner. The use of concrete (or other toxic materials) at riparian and in-stream locations should only occur in the dry to prevent contamination of adjacent surface waters.</p> <p>Amend Section 2.3.9 further (7th overall bullet point) to require in developments adjacent to watercourses, that any structure must be set back a minimum distance of 10m from the top of the bank to allow access for channel cleaning and maintenance, unless otherwise agreed with the Planning Authority. This may be increased depending on the size of the watercourse and any particular circumstances.'</p> <p>Section 2.2.37 Road Objectives.</p>

		<p>Manager's Recommendation: Minimise the impact of the construction and operation of roads and watercourse crossings on fish and their habitat and other wildlife habitats, e.g. crossing points for badgers etc., through consultation with appropriate authorities, and through implementing 'Requirements for the Protection of Fisheries Habitat during the Construction and Development Works at River Sites'</p>
<p>Sufficient treatment capacity should be available both within the receiving sewerage system locally and downstream at the relevant Waste Water Treatment Plant to ensure ecological integrity.</p>	<p>0257</p>	<p>Manager's Response This issue can be addressed by inserting an appropriate amendment in relation to the protection of ground and surface waters.</p> <p>Manager's Recommendation Amend Section 2.3.10.i by inserting a new paragraph to read as follows: It is an objective of the Council that sufficient conveyance capacity should be available within the receiving sewerage system locally and sufficient treatment capacity should be available downstream at the relevant Waste Water Treatment Plant, to ensure ecological integrity.</p>
<p>The Plan should promote the protection of surface water, groundwater, coastal and estuarine water resources and their associated habitats and species, including fisheries.</p>	<p>0254</p>	<p>Manager's Response Policies WD3 (2.3.10.i) Quality of Surface Water and Groundwater, WD5 (2.3.12.i) Water Quality Management Plans, WD6 (2.3.12.ii) Sustainable urban Drainage Systems, WD8 (2.3.12.iv) Water Pollution Abatement Measures, LHA9 (4.3.7.vii) Impacts on Natura 2000 Sites, LHA19 (4.3.7.xvii) Flora and Fauna, LHA20 (4.3.7.xviii) River and Stream Management, and LHA21 (4.3.7.xix) Watercourses, deal with the issues mentioned.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Reference should be made to the proposed surface water environmental quality standards set out in the Draft European Communities Environmental Objectives (Surface Waters) Regulations 2008, which address the WFD</p>	<p>0254</p>	<p>Manager's Response Reference to the proposed measures should be included in the Draft Plan.</p> <p>Manager's Recommendation Amend Section 2.3.11 to insert the following additional paragraph:</p>

<p>(2000/60/EC) and the Dangerous Substances Directive (2006/11/EC). When these regulations are made the Plan should ensure that these environmental quality standards are achieved.</p>		<p>It is an objective of the Council to ensure the effective implementation of the surface water environmental quality standards to be set out in the European Communities Environmental Objectives (Surface Waters) Regulations 2008, which address the WFD (2000/60/EC) and the Dangerous Substances Directive (2006/11/EC), when these regulations become effective.</p>
<p>Consider including specific objectives and measures to mitigate discharges from landfills, mines and contaminated lands to the Dodder and Camac Rivers. Noted that in 2008, the Camac River, Dodder River and Liffey River were tested as being Q2-3 (Poor Quality) in the Dublin environs.</p>	<p>0254</p>	<p>Manager's Response The poor water quality results for parts of the Liffey, Camac, Dodder and Griffeen were due to misconnections of foul sewerage to surface water systems, and agricultural run off. Measures to mitigate discharges will be addressed under the relevant EPA licence procedures.</p> <p>Manager's Recommendation No change recommended.</p>
<p>The Plan should address, as appropriate, by way of relevant objectives, and appropriate land use zoning where relevant, the significant water management issues identified in the Water Matters Consultation publications for the ERBD RBMP and associated POM.</p>	<p>0254</p>	<p>Manager's Response This issue is addressed in Sections 2.3.11 and 2.3.12 of the Draft Plan.</p> <p>Manager's Recommendation Amend Section 2.3.12.i to replace "when adopted" with "and any future amendments"</p>
<p>Reference should be made as appropriate to the Code of Practice: Wastewater Treatment and Disposal Systems Serving Single Houses (p.e < 10), (EPA, 2009).</p>	<p>0254</p>	<p>Manager's Response Section 1.2.53 of the Draft Plan should be amended accordingly.</p> <p>Manager's Recommendation Amend Section 1.2.53 as follows. (1) Replace the second paragraph with the following: "On sites where the use of a septic tank or alternative treatment system is proposed, the proposed tank or system and the percolation area shall comply with the requirements of the Code of Practice: Wastewater Treatment and Disposal Systems Serving Single Houses (p.e < 10), (EPA, 2009) (or as may be amended from time to time)." (2)delete the third paragraph.</p>

		(3) Replace the final sentence in the fourth paragraph with the following revised text; "The Site Characterisation Form in Annexe C.3 of the Code of Practice: Wastewater Treatment and Disposal Systems Serving Single Houses (p.e < 10) (EPA, 2009) shall be used for this purpose regardless of the type of system proposed."
<p>At S. 7.10.3 insert new policy objective as follows 'That the Planning Authority will positively support the provision of Integrated Constructed Wetlands (ICW) as an alternative to conventional waste water treatment plants in rural villages, urban centres and for one-off dwellings throughout the county.'</p> <p>At S.7.10.3 insert a new Specific Objective as follows: 'That the Planning Authority will implement a pilot scheme of Integrated Constructed Wetlands (ICW) projects throughout the county.'</p>	0255	<p>Manager's Response The council will consider any such proposals on their individual merits in accordance with the policies relating to ground and surface waters, and rural housing, as set out in the Draft Plan.</p> <p>Manager's Recommendation No change recommended.</p>
Request Council immediately performs flood risk assessment on all residential and industrial zoned lands in the county-written into CDP as a policy.	0105 0137 0138 0144	<p>Manager's Response Section 2.3.25 sets out the Council's intentions regarding Catchment-based Flood Risk Assessment and Management Plans (CFRAMS). As part of the Dodder and Liffey CFRAMS a flood risk assessment will be carried out on all residential and industrial zoned lands.</p> <p>Manager's Recommendation No change recommended.</p>
Consideration should be given to the Planning Guidelines on flooding in "The Planning System and Flood Risk Management - (Environment, Heritage and Local Government – OPW, November 2009)", in the context of any flood risk assessment.	0254	<p>Manager's Response Reference is made to the Draft Guidelines and related matters in Sections 2.3.21 to 2.3.26 inclusive.</p> <p>Manager's Recommendation Amend all references to the Draft Guidelines 2008 to read "The Planning System and Flood Risk Management - Guidelines for Planning Authorities, November 2009".</p>

<p>The Plan should make reference to the E.U Directive (2007/60/EC) on the assessment and management of flood risks.</p>	<p>0254</p>	<p>Manager's Response The directive is referred to in Section 2.3.22.i of the Draft plan.</p> <p>Manager's Recommendation No change recommended.</p>
<p>The Plan should promote the development, where appropriate, of adaptation measures to account for the likely increased risk of flooding due to Climate Change within the Plan area.</p>	<p>0254</p>	<p>Manager's Response Sections 2.3.21 to Section 2.3.26 inclusive address the relevant issues which are covered under Regional Drainage Policy on Climate Change as part of GDSDS.</p> <p>Manager's Recommendation No change recommended.</p>
<p>The Plan should provide for the protection, management, and as appropriate, enhancement of existing wetland habitats where flood protection/management measures are necessary.</p>	<p>0254</p>	<p>Manager's Response An appropriate statement should be included in Section 2.3.21.</p> <p>Manager's Recommendation Insert an additional bullet point after final bullet point in Section 2.3.21 (page 121) to read as follows: To ensure the protection, management, and as appropriate, enhancement, of existing wetland habitats where flood protection/management measures are necessary.</p>
<p>Opposed to development on floodplains and requests a stated commitment that proposals would not interfere with natural floodplains.</p>	<p>0257</p>	<p>Manager's Response It is considered that the measures detailed in Sections 2.3.21 to 2.3.26 inclusive adequately address the issues relating to development in Flood Risk Areas in accordance with the relevant guidelines.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Consideration should be given to including a specific policy to ensure inclusion of the CFRAMS</p>	<p>0254</p>	<p>Manager's Response It is considered that this issue is addressed in the relevant objectives under Section</p>

<p>results / Manager's Recommendations for the Rivers Dodder and Liffey, when available.</p>		<p>2.3.27.iii of the Draft Plan.</p> <p>Manager's Recommendation No change recommended.</p>
<p>A specific Policy should be included to provide for / promote appropriate flood risk assessments to be undertaken of development proposals in areas liable to flooding to avoid increased risk of flooding of the lands either within or adjoining the zoned areas.</p>	<p>0254</p>	<p>Manager's Response It is considered that the measures detailed in Sections 2.3.21 to 2.3.26 inclusive adequately address the issues relating to development in Flood Risk Areas in accordance with the relevant guidelines.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Recommend inserting the following text in Policy WD15 'Where it is a Manager's Recommendation of the CFRAMS that land zoned for development constitutes an unacceptable flood risk the Planning Authority will commence proceedings under s.13 of the Planning and Development Act 2000 (as amended) to amend the zoning objective pertaining to the lands as required.</p>	<p>0255</p>	<p>Manager's Response Section 2.3.25 of the Plan notes that recommendations and outputs from the Dodder and Liffey CFRAMS process will be incorporated into the Development Management process. This will ensure that long term strategies and programmes for flood risk management will be implemented on an ongoing basis. It is recommended that attention be drawn to the CFRAMS flood extent maps and the "alluvial soils" floodplain maps by means of a SLO located alongside the potential flooding areas.</p> <p>Recommendation SLO: The areas of flooding potential as indicated in the Dodder Catchment Flood Risk Assessment Management Study (CFRAMS) and the OPW "alluvial soils" floodplain maps are to be taken into account along with the requirements of Section 5 of The Planning System and Flood Risk Management Guidelines (November 2009) when assessing planning applications, with a view to restricting or, if necessary, refusing development proposals within such areas in order to avoid flooding events.</p>
<p>Brittas village should be provided with a potable</p>	<p>0071</p>	<p>Manager's Response</p>

<p>water supply and be provided with connection to mains supply.</p> <p>Seeking a water treatment plant to serve village, rural housing and modest future expansion.</p> <p>That Brittas be connected to the main water and sewerage systems.</p>	<p>0281</p>	<p>Brittas already has a potable water supply. There is no proposal at present to provide public mains water and sewerage treatment services to the Brittas area, having regard to its location outside the Dublin Metropolitan area, and to the absence of any funding commitment for such from central government.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Infrastructure – proposes that an implementation strategy be designed and implemented to control flash flooding in Lucan.</p> <p>Requests a strategy to control flash flooding in the Brittas area.</p>	<p>0071 0281</p>	<p>Manager's Response The control of flash flooding in Lucan and Brittas will be addressed in the Liffey Catchment-based Flood Risk Assessment and Management Plan (CFRAMS). However, improvements to the Griffeen River and Tobermaclugg Stream have significantly reduced the risk of flooding.</p> <p>Manager's Recommendation No change recommended.</p>

6.4.3 Environmental Services

Issue	Sub. No.	Manager's Response and Recommendation
Waste Management		
<p>The Plan should take into account, where appropriate, the information and any recommendations in the following EPA reports: The Nature and Extent of Unauthorised Waste Activity in Ireland; National Waste Report 2006; National Hazardous Waste Management Plan 2008 – 2012; and Ireland's Environment 2008 – State of the Environment report.</p>	0254	<p>Manager's Response It is considered that this issue is adequately addressed in Section 2.4.3 without the need to list the individual reports.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Amend Section 2.4.5 as follows:</p> <ul style="list-style-type: none"> • Amend the third paragraph under Section 2.4.5 to read: Recycling and re-use will be a priority of the Council in the disposal of waste. In accordance with the Waste Management Act, 1996 (as amended), this Development Plan shall be deemed to include the objectives for the time being contained in the Waste Management Plan for the Dublin Region 2005 to 2010 (or as may be amended from time to time). The Council will endeavour to develop its own Waste Management Plan involving greater emphasis on reduce, reuse, recycle and a commitment not to incinerate any materials for a ten year period, pending evaluation of the success of national waste management strategy. • Omit the word 'further' from the fourth paragraph under Section 2.4.5. • Support for the points made in the fifth and sixth 	0063	<p>Manager's Response SDCC has no proposal to leave the Dublin regional group and prepare its own waste plan. The Council is committed to using the waste to energy facility once it has been developed.</p> <p>In the interest of clarity the word 'further' should be removed from section 2.4.5.</p> <p>Manager's Recommendation Amend Section 2.4.5 to omit the word 'further'.</p>

paragraphs in Section 2.4.5.		
The specific reference to 'composting' in policy ES3 should be replaced with referral to 'biological treatment' to incorporate other forms of such treatment including Anaerobic Digestion.	0248	<p>Manager's Response There is no objection to the suggested change of wording.</p> <p>Manager's Recommendation Amend Section 2.4.6.ii to replace "composting" with "biological treatment".</p>
Biodegradable waste should be included in the list of Priority Waste Streams.	0061 0105 0144	<p>Manager's Response There is no objection to the suggested change.</p> <p>Manager's Recommendation Amend Section 2.4.7 to insert the additional bullet point</p> <ul style="list-style-type: none"> • Biodegradable waste
Request to assign dedicated person to role of Waste Prevention Officer.	0061	<p>Manager's Response The environmental awareness section in SDCC deals with waste prevention and minimisation.</p>
Employ a Waste Minimisation Officer and to work with the other council's in the Dublin Region.	0105 0144	<p>Manager's Recommendation No change recommended.</p>
Request Council to be mindful of obligations under Food Waste Regulations- come into effect in 2010	0061	<p>Manager's Response This issue is properly addressed by policy ES1 among others.</p> <p>Manager's Recommendation No change recommended.</p>
Lack of appropriate waste management infrastructure - recycling and composting facilities should be 'first to operate'.	0061	<p>Manager's Response Policies ES3 & ES6 address this matter adequately. The Waste Management Plan for the Dublin Region 2005 to 2010 gives specific detail on the provision of the necessary waste infrastructure.</p> <p>Manager's Recommendation</p>

		No change recommended.
Consideration should be given to the inclusion of a Policy/Objective to prioritise the provision of adequate and appropriate waste-related infrastructure (recycling / recovery etc.) in advance of any significant development.	0254	<p>Manager's Response Section 2.4.9 of the plan deals with this issue, and in particular how the Waste Management Plan for the Dublin Region specifically addresses the lack of waste infrastructure. The regional MRF opened in 2009 and has successfully addressed the issue of materials recovery capacity. There remains a lack of capacity for biological treatment of waste, however there is capacity in the region for transfer of this waste stream to processing facilities just outside the region until such time as a facility is developed. It is not considered appropriate that significant development should be contingent on provision of this infrastructure in advance.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Suggest provide curb side green waste collection or establish collection of green waste and food waste on alternate weeks.</p> <p>Implementation of Brown Bin will help fulfil obligations under the land fill directive and strengthen and enhance the collection of food waste from the commercial sector.</p> <p>Proposals to roll-out the brown-bin service either by the Council or by third party operators is essential.</p>	0061 0102 0105 0137 0138 0144	<p>Manager's Response SDCC plan to introduce a door to door collection of bio-degradable waste in 2010. This will see the Council implement the relevant national and EU policy with regard to the diversion of this type of waste away from landfill. Policy ES1 addresses this matter adequately.</p> <p>Manager's Recommendation No change recommended.</p>
<p>The Council should welcome the labour intensive recycling jobs that recycling will bring.</p> <p>Significant deficiencies particularly in relation to biodegradable waste management and missed opportunities in relation to the leverage of</p>	0102 105	<p>Manager's Response The Council's waste policy is in general to achieve the targets for recycling and diversion of waste away from landfill as set down in the Waste Management Plan for the Dublin Region, and in doing this to be compliant with National and EU waste legislation. Policies ES1 & ES3 address this fully.</p>

<p>employment opportunities in sustainable waste management.</p>		<p>Manager's Recommendation No change recommended.</p>
<p>Disappointed to note that the Esker Green Waste facility has closed. This should be re-opened or replaced.</p>	<p>0137 0138</p>	<p>Manager's Response Garden waste will be accepted in brown bins, therefore re-opening of Esker facility is not considered necessary.</p> <p>Manager's Recommendation No change recommended.</p>
<p>The Plan should promote and take into account, as appropriate, the maximisation of opportunities for waste prevention and source separation of waste through provision of adequate civic amenity and/or bring sites within Plan area, and National and Regional Waste Management Planning processes so that priority waste issues are addressed i.e. the implementation of segregated brown bin collection for bio-waste.</p>	<p>0254</p>	<p>Manager's Response Policy ES6 and section 2.4.11 of the Plan deal with this adequately. These matters are developed in much greater detail in the Waste Management Plan for the Dublin Region 2005 to 2010.</p> <p>Manager's Recommendation No change recommended.</p>
<p>The specific reference to 'composting' in policy ES7 should be replaced with referral to 'biological treatment' to incorporate other forms of such treatment including Anaerobic Digestion.</p>	<p>0248</p>	<p>Manager's Response There is no objection to the suggested change of wording.</p> <p>Manager's Recommendation Amend Section 2.4.12.i to replace "composting" with "biological treatment".</p>
<p>Policy ES7- missed opportunity to state that we would welcome the siting of more sustainable waste management infrastructure within the County - labour intensive activities could provide much needed employment stimulus.</p>	<p>0061</p>	<p>Manager's Response It is considered that Policies ES7 & ES8 fully address the Council's commitment to utilising waste prevention, minimisation, reuse, recycling, recovery and disposal options in accordance with the EU waste hierarchy.</p> <p>Manager's Recommendation No change recommended.</p>

<p>Insert Policy in relation to Incinerators- to ensure the expressed wishes of SDCC Councillors, the families that live within SDCC and the Council themselves be galvanised against further applications which will be costly.</p>	<p>0061</p>	<p>Manager's Response Section 2.4.5 states that there is no proposal for a waste to energy facility within the County.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Section 2.4.13- Municipal Solid Waste Disposal- intention to develop 'waste to energy' conversion systems is in direct conflict with the expressed wishes of the SDCC Councillors and population of South Dublin- does not preclude the siting of an incinerator in South Dublin.</p> <p>Section 2.4.13 Municipal Solid Waste Disposal should be deleted.</p>	<p>0061 0102 0105 0144</p>	<p>Manager's Response Section 2.4.13 refers to the development of the regional waste to energy facility in the Dublin City Council area. Section 2.4.5 states that there is no proposal for a waste to energy facility within the County.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Having regard to the delays associated with the thermal treatment plant at Poolbeg, it is sensible and in accordance with proper waste management planning that Mechanical Biological Treatment (MBT) is recognised as a residual treatment option in the Development Plan to ensure the landfill directive targets are achieved.</p>	<p>0248</p>	<p>Manager's Response It is considered that this would conflict with the Regional Waste Management Plan.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Suggest adding 'and/or private waste operators' are included after the words 'with adjoining local authorities' in section 2.4.13 in relation to MSW disposal.</p>	<p>0248</p>	<p>Manager's Response This appears to refer to the planning of waste infrastructure and facilities, which is the responsibility of the Dublin Waste Strategy Co-ordination Group. It would not be appropriate to insert the suggested wording.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Policy ES9- Mechanical and biological treatment</p>	<p>0061</p>	<p>Manager's Response</p>

<p>of residual waste has less impact in relation to green house gases compared to landfill or incineration and hasn't been considered.</p>		<p>Policy ES9 is consistent with the Waste Management Plan for the Dublin Region 2005 to 2010.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Suggest omit a) "Waste to energy' conversion;" from 2.4.14.i Policy ES9.</p>	<p>0158</p>	<p>Manager's Response No change proposed. The development of a waste to energy facility in the Dublin region forms a main part of the strategy outlined in the Waste Management Plan for the Dublin Region 2005 to 2010. The Council is committed to the development of this facility, along with the other Dublin local authorities. It is not possible to insert a policy in the development plan that is in conflict with this.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Plan does not set out metrics in relation to the recovery of construction and demolition waste- reflect the review of the Waste Management Policy (DoEHLG).</p>	<p>0061</p>	<p>Manager's Response The plan at section 2.4.17 makes reference to the use of the Best Practice Guidelines on the preparation of Waste Management Plans for Construction & Demolition Projects (2006). Those guidelines set out in detail what such a plan should entail.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Request that South Dublin County Council and the EPA regulate landfill, reclamation and its impact on the people of the Brittas locality, the infrastructure and environment.</p>	<p>0071</p>	<p>Manager's Response It is considered that this is addressed adequately under sections 2.4.7 and 2.4.18ii.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Would welcome a specific addition to Section 2.4.17 to highlight the suitability of locating recycling facilities in authorised working extractive sites, in line with most Regional Waste</p>	<p>0100</p>	<p>Manager's Response Details regarding the locating of recycling facilities would be more appropriately dealt with by the Waste Management Plan for the Dublin Region 2005 to 2010, which is due to be reviewed this year.</p>

<p>Management Plans nationwide.</p>		<p>Manager's Recommendation No change recommended.</p>
<p>Section 2.4.17 Construction Demolition Waste, Landfill Sites, Refuse Transfer Stations and Unauthorised Waste Disposal</p>		
<p>Paragraph 8, Page 130. It is proposed that the following text change be made <i>'The Irish Aviation Authority and the Department of Defence shall be consulted regarding potential threat to aviation through bird hazard...'</i></p>	<p>0218</p>	<p>Manager's Response The amendment suggested by the Department of Defence would include the said Department as a consultee. Having regard to the aviation safety implications of the issue in question (i.e. the risk of birdstrike), it is considered that the proposed amendments are justified.</p> <p>Manager's Recommendation Page 130, Paragraph 8; replace <i>'will'</i> with <i>'shall'</i> and <i>'interference'</i> with <i>'threat'</i> and refer to the Department of Defence, so that second sentence reads <i>'The Irish Aviation Authority and the Department of Defence shall be consulted regarding potential threat to aviation through bird hazard in relation to such facilities'</i></p>
<p>The Plan should highlight as appropriate the requirements of the Waste Management (Certification of historic unlicensed waste disposal and recovery activity) Regulations 2008 (SI No. 524 of 2008).</p>	<p>0254</p>	<p>Manager's Response It is considered that this is addressed adequately under policy ES13.</p> <p>Manager's Recommendation No change recommended.</p>
<p>The Plan should promote an integrated approach to waste management for any proposed development. An integrated plan for managing waste should include wastes generated during the construction phase of development as well as the operation and maintenance phases. In this regard, the Plan should make reference to the Best Practice Guidelines on the preparation of Waste Management Plan for Construction & Demolition</p>	<p>0254</p>	<p>Manager's Response This is addressed in section 2.4.17 of the plan.</p> <p>Manager's Recommendation No change recommended.</p>

Projects" (DEHLG July 2006).		
Consideration should be given to the inclusion of a new Objective / Policy (or the amendment of Policy ES12) to include the use of statutory powers to prohibit the illegal burning, deposit and disposal of waste materials.	0254	<p>Manager's Response It is considered that this is addressed adequately under Policy ES12.</p> <p>Manager's Recommendation No change recommended.</p>
SDCC have the least number of inspections and enforcement procedures of the Four Dublin Authorities in relation to illegal dumping- clear message to offenders that this will go unpunished.	0061	<p>Manager's Response The data referred to is not the most recent available.</p> <p>Manager's Recommendation No change recommended.</p>
Request a register of enforcement activity against companies and individuals who have carried out illegal dumping- introduce more stringent measures of enforcement.	0061	<p>Manager's Response Such a register is already maintained, in accordance with section 18 of the Waste Management Act..</p> <p>Manager's Recommendation No change recommended.</p>
Deploy CCTV to discourage illegal-tipping.	0071	<p>Manager's Response This is contained as an objective in the Council's Litter Management Plan.</p> <p>Manager's Recommendation No change recommended.</p>
Funds from residual waste levies should be ring fenced to develop an environmental fund - utilise this for illegal dumping in the Dublin Mountains.	0061	<p>Manager's Response This is a national issue, and not a development plan matter. The levies mentioned are collected by central government. Action taken at present by the Council in dealing with this type of illegal dumping is paid for from the Council's own revenue budget.</p> <p>Manager's Recommendation No change recommended.</p>

<p>Litter management plans be devised for Rathcoole, Lucan, Clondalkin and Palmerstown.</p>	<p>0281</p>	<p>Manager's Response The development of litter management programmes for town and village centre locations is provided for in the Council's Litter Management Plan, as referred to in section 2.4.19 of the development plan.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Air, Noise & Light Pollution</p>		
<p>Consideration should be given to promoting specific Policies / Objectives in the Plan for the protection and improvement, as appropriate, of air quality within the Plan area, particularly in areas zoned for increased urban and transport related development.</p>	<p>0254</p>	<p>Manager's Response Council policy regarding air quality is set out in Section 2.4.26 of the Draft Plan. The monitoring of air quality will be carried out under the provisions of the Air Quality Management Plan for the Dublin Region, 2009-2012 which has recently been adopted by the four Dublin local authorities. The draft plan should be amended in this regard.</p> <p>Manager's Recommendation Amend Section 2.4.26 Policy ES17 to read 2.4.26.i Policy ES17</p> <p>Amend Section 2.4.26 to insert the following: 2.4.26.ii South Dublin County Council has recently adopted the <i>Air Quality Management Plan for the Dublin Region 2009-2012</i> under the provisions of the <i>Air Pollution Act 1987</i>. This plan is primarily directed at protecting the valuable asset of good air quality in this county and the region, and ensuring that adverse air quality does not impact on the most vulnerable of the population whether their vulnerability is due to occupation, age, existing health conditions or other factors.</p> <p>In conjunction with the EPA and the other Dublin local authorities the main air pollutants to be measured and monitored during the lifetime of this Air Quality Management Plan are smoke and particulate matter, Sulphur Dioxide (SO₂), Nitrogen Dioxide (NO₂), Carbon Dioxide (CO₂), Lead and Benzene.</p>
<p>Policy ES19 should be amended to read "to assess and minimise the effects of all external</p>	<p>0107 0240</p>	<p>Manager's Response Section 2.4.29 and Policy ES19 are intended to provide guidance on the assessment</p>

lighting on environmental amenity.”		of proposals for new development. Manager's Recommendation No change recommended.
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6.4.4 Telecommunications and Energy

Issue	Sub. No.	Manager's Response and Recommendation
Energy		
<p>Request that the Plan includes an objective on energy and renewable energy, in line with the white paper on energy, 'Towards A Sustainable Energy Future for Ireland', the Energy Policy Framework 2007-2020.</p> <p>Request that the Plan makes reference to the government's energy strategies and the relevant bodies that are mandated to implement these such as EirGrid through its Grid25 strategic document.</p>	<p>0233 0234</p>	<p>Manager's Response The strategic role of secure and reliable electricity transmission and distribution networks in the economic and social development of the County is recognised in sections 2.5.2, 2.5.3, 2.5.13 , and 2.5.14 of the draft plan. The insertion of a reference to the Government's energy policy, and a specific reference to 'Eirgrid' is considered appropriate.</p> <p>Manager's Recommendation Amend Section 2.5.2 to insert the following introductory comment The White Paper 'Delivering A Sustainable Energy Future For Ireland' sets out the Government's Energy Policy Framework 2007-2020 to deliver a sustainable energy future for Ireland. The Government's over-riding policy objective is to ensure that energy is consistently available at competitive prices with minimal risk of supply disruption.</p> <p>Strategic Goals of particular relevance to land use planning, include: addressing climate change by reducing energy related greenhouse gas emissions; accelerating the growth of renewable energy sources; promoting the sustainable use of energy in transport; maximising energy efficiency and energy savings across the economy; delivering electricity and gas to homes and businesses over efficient, reliable and secure networks; and ensuring an integrated approach to energy policy across all government departments and agencies.</p> <p>Amend Policy EC9 (Section 2.5.14.i) to insert "Eirgrid" after "Bord Gais"</p>
Electricity Infrastructure		
Request that the Plan include an objective to	0233	Manager's Response

<p>support and facilitate bulk energy infrastructure as the underlying backbone of development in the region to include maps.</p> <p>Need to support the extension and reinforcement of the electricity network recognised in the Draft Plan.</p> <p>Highest priority be assigned to the provision of electricity infrastructure-essential for social and economic development.</p>	<p>0234</p> <p>0027</p>	<p>Sections 2.5.13 and 2.5.14 set out the Councils policy and objectives in support of the provision of energy facilities by service providers. These provisions are considered to be adequate for the purposes of the County Development Plan. Furthermore careful consideration must be given these links, particularly the need, where appropriate, for these to be undergrounded. This is particularly the case where these lines run in close proximity to the main Dublin-Cork line. While the improvement of energy supply is welcomed it must be balanced against the development of sustainable planned communities and the use rail corridors to promote national and regional planning objectives particularly within and directly adjacent to the existing built area of South Dublin County</p> <p>Manager's Recommendation No change recommended.</p>
<p>Requests that the concept of corridor development be applied within the Plan to facilitate the county wide national electrical grid and grid connections. Stresses the requirement to conform to the NSS objective for strategic corridors.</p>	<p>0233</p> <p>0234</p>	<p>Manager's Response Section 2.5.3 states "It is a general objective, where strategic route corridors have been identified, to support the statutory providers of national grid infrastructure by safeguarding such strategic corridors from encroachment by other developments that might compromise the provision of energy networks." It is considered that this provision is adequate. Furthermore careful consideration must be given these links, particularly the need, where appropriate, for these to be undergrounded. This is particularly the case where these lines run in close proximity to the main Dublin-Cork line. While the improvement of energy supply is welcomed it must be balanced against the development of sustainable planned communities and the use rail corridors to promote national and regional planning objectives particularly within and directly adjacent to the existing built area of South Dublin County</p> <p>Manager's Recommendation No change recommended.</p>
<p>ESB consulted as early as possible for new development-lead in times for 110kV substations</p>	<p>0027</p>	<p>Manager's Response It is considered that these issues are more appropriate to be addressed as</p>

<p>and cable connections 3-4 years.</p> <p>Availability of sites in urban locations for installation of HV substations problematic-provisions should be made in early phase of planning.</p>		<p>Development Management operational matters.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Request that the Plan makes a distinction between the distributions system and the transmission system of the electrical grid and that there should be a presumption in favour of the over grounding of Transmission lines.</p> <p>Overhead lines preferred means of distributing electricity over the ESB sub-transmission network.</p>	<p>0233 0234</p> <p>0027</p>	<p>Manager's Response Sections 2.5.4 and 2.5.5 of the Draft Plan set out the Council's policy and objectives in relation to Overhead Cables which seek the undergrounding of all service provider cables in new development, and particularly in areas of sensitivity. These are considered appropriate for the purposes of the Development Plan.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Renewable Energy</p>		
<p>The Plan should promote, where appropriate, the use of renewable energy systems (e.g. solar, wind, geothermal etc.) within the Plan area. The Plan should also provide for promotion of energy conservation measures in buildings.</p>	<p>0254</p>	<p>Manager's Response It is considered that the statements relating to renewable energy in Sections 2.5.9 to 2.5.12 of the Draft Plan are adequate for this purpose. Energy conservation measures in buildings are addressed in Sections 1.4.38 to 1.4.44 of the Draft Plan.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Request that the Plan include an objective to be in line with the government objective of achieving 40% renewable energy by 2020, to be facilitated by the upgrading and strengthening of the Grid by Eirgrid.</p>	<p>0233 0234</p>	<p>Manager's Response It is considered that the statements in Sections 2.5.9 to 2.5.14 of the Draft Development Plan are adequate for this purpose.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Hope that the geothermal fault line that traverses the County will be explored and tested for</p>	<p>0105 0137</p>	<p>Manager's Response The Draft County Development Plan has a range of policies with regard to renewable</p>

<p>suitability as an energy source. Do not wish for it to be used as an excuse, or bargaining chip, for the zoning or permittal of residential development.</p>	<p>0138 0144</p>	<p>energy. The issues surrounding energy, including renewables is complex and ranges beyond the purview of the Development Plan. The Council recognises this and has been carrying out significant work in this area, with a view to forming a County energy policy. It is the view of the Council that such a policy will allow for a coherent, comprehensive but flexible policy to be taken to energy policy. In particular the energy policy will identify future and current demand, improve efficiency to reduce demand, increase the share of renewables in supply and ensure diversity of supply.</p>
<p>Requests that the phrase "on lands already rezoned for residential purposes in previous Development Plans" be inserted after "in a new energy self-sufficient residential development" in Section 2.5.9. In addition to this the sentence "to ensure that such an energy resource is in use before this County Development runs its course" be removed.</p>	<p>0107</p>	<p>Furthermore, the Council is at an advanced stage in preparing an energy map for Tallaght. This allows for a structured and metrics based approach to be taken to assessing the better, more efficient use of energy in the area including the provision of more renewable energy options. It is envisaged that this energy mapping approach should be rolled out in structured way throughout the County.</p>
<p>In order to ensure that the pilot project mentioned in Section 2.5.9 does not involve the rezoning of additional residential lands the words "on lands already rezoned for residential purposes in previous Development Plans" should be inserted after "in a new energy self-sufficient residential development". And the following sentence should be removed: "to ensure that such an energy resource is in use before this County Development Plan runs its course".</p>	<p>0240</p>	<p>Given the above work it is considered that the Development Plan should recognise this and be supportive of it. It is therefore recommended that the following policies be added to the Development Plan;</p> <ul style="list-style-type: none"> • That a County Energy Policy be prepared which will identify current and future demand; improve efficiency to reduce demand; increase the share of renewables in supply and; ensure diversity in supply. • That the energy mapping system be rolled out throughout the County on an appropriate phased basis.
<p>Encourages the compulsory inclusion of the benefits of a geothermal led district network in all Local Area Plans for the County.</p>	<p>0060</p>	<p>Manager's Recommendation It is recommended that the following policies be added to the Development Plan;</p>
<p>Extend Policy 2.5.10(i) to include " Support of the Pilot Scheme at Newcastle and the Continued investigation of the Potential and scale of the deep geothermal resource found at Newcastle and to support the promotion and investigation of the resource in South County Dublin".</p>	<p>0060</p>	<ul style="list-style-type: none"> • That a County Energy Policy be prepared which will identify current and future demand; improve efficiency to reduce demand; increase share of renewables in supply and ensure diversity in supply. • That the energy mapping system be rolled out throughout the County on an appropriate phased basis.

<p>Include strong policy support in relation to the provision for the construction of back up plants and required ancillary work and the development of necessary district heating networks to distribute available heat- geothermal energy.</p>	<p>0060</p>	
<p>Believes that Policy 2.5.9 is inadequate with regard to geothermal energy and it ignores the potential of the resource at Newcastle. Suggests that research has already been carried out and that there is no requirement for the Council to examine potential geothermal resources. Furthermore the Plan should contain an acknowledgment of the benefits of geothermal energy and the potential of Newcastle in this regard.</p>	<p>0216</p>	
<p>Support given for the geothermal pilot project at Newcastle/Greenogue.</p>	<p>0244</p>	
<p>Request that the Plan state clear support for the possibility of biomass becoming a significant contributor to the energy mix in the County.</p>	<p>0244</p>	<p>Manager's Response It is considered that the statements relating to renewable energy in Sections 2.5.9 and 2.5.10.i of the Draft Plan are adequate for this purpose.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Policy EC8 Request that this policy be amended to cover all hydro-power developments.</p>	<p>0018</p>	<p>Manager's Response It is considered that Policy EC7 (Section 2.5.10.ii) relating to Small Scale Hydroelectricity Projects is adequate for this purpose.</p> <p>Manager's Recommendation No change recommended.</p>

<p>Any new environmental initiatives (i.e. , the use of on-site micro renewables or district heating systems) required by the Council should be treated as a 'pilot projects'. Developers who are conditioned to provide for such initiatives should be grant aided by the Council in respect of these requirements. Such additional costs are prohibitive in the current economic environment, and will act as a deterrent for promotion of future development</p>	<p>0237</p>	<p>Manager's Response Provision for the grant-aiding of projects is not considered to be an appropriate matter for the County Development Plan.</p> <p>Manager's Recommendation No change recommended.</p>
<p>With regard to the objective to examine the possibility of designating a highland area of the county as being suitable for the production of wind energy, it is recommended that the Departmental Guidelines and compliance thereto are referred to in the Plan. In addition such a designation would be subject to appropriate assessment screening and if necessary appropriate assessment.</p>	<p>0164 0283</p>	<p>Manager's Response Reference to the Wind Energy Development Guidelines for Planning Authorities (2006) is included in Sections 2.5.9 (Renewable Energy) and 2.5.11 (Wind Energy) of the Draft Plan. Policy LHA9 (Section 4.3.7.vii) addresses the requirement for appropriate assessment of relevant projects.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Request that Section 2.5.11 be amended to ensure that private investment in the area of wind energy development be attracted to the County.</p>	<p>0244</p>	<p>Manager's Response It is considered that Sections 2.5.9 and 2.5.10 (Renewable Energy) and Sections 2.5.11 and 2.5.12 (Wind Energy) are adequate for this purpose.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Telecommunication Network</p>		
<p>Support for Council's aim of facilitating a widespread telecommunications infrastructure in sustainable locations.</p>	<p>0246 ICIA</p>	<p>Manager's Response Support noted.</p> <p>Manager's Recommendation No change recommended.</p>
<p>It is Government stated policy that there is no</p>	<p>0049</p>	<p>Manager's Response</p>

<p>health risk from base station installations, provided they operate in compliance with international emission standards as may be set from time to time.</p> <p>Requests that all references to public health relating to telecommunications sites be removed from the draft plan.</p> <p>The 1996 Guidelines addressed the matter of base station sites in residential areas. The guidelines do not suggest that base stations should be refused in residential areas. No distance is specified. If the Guidelines are to be ignored, the planning authority should clearly indicate why. This it has failed to do.</p> <p>Requests that the Telecommunications policy be amended to relax the 100 metres restriction on communication masts in vicinity of residential areas, schools and hospitals, as no adverse short or long-term health effects have been shown to occur from Radio Frequency signals produced by base stations. A more flexible approach is suggested which will facilitate exceptions to be made to the 100 metre rule, where a site can be proven to be a location of last resort, as set out in the 1996 Guidelines for Planning Authorities – Telecommunications Antennae and Support Structures. It is only through adapting the policy in this way that the council can hope to achieve its goal of securing the counties image as the premier location for enterprise.</p> <p>Request that the 100m rule, the limiting of</p>	<p>O2</p> <p>0174 Meteor</p> <p>0049 0156 Vodafone</p> <p>0172 ESB Networks</p> <p>0239 Meteor 0246</p>	<p>The approach adopted in the draft development plan follows that of the current plan, and reflects public concerns regarding the siting of mobile phone antennae and masts. The conclusion of the Expert Group (Report of Expert Group on Health Effects of Electromagnetic Fields, DCMNR 2006) that the scientific evidence does not indicate any health effects from exposure to the Radio Frequency fields emitted by base stations is noted. However, the report also notes that public concerns reflect a lack of public confidence in the existing national guidelines, the exemption process, and the adequacy of information provided in planning applications. The Expert Group strongly recommends that national guidelines be agreed on the planning and approval process for new antennae on existing masts and future base stations through a public consultative process, and suggests that this could lead to an improvement in the public acceptance of base stations. Pending the issuing of new national guidelines it is considered that the proposed draft plan provisions are satisfactory and consistent with the national guidelines.</p> <p>Manager's Recommendation No change recommended</p>
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<p>permission to 3 years, the requirement to provide evidence that relevant bodies have been consulted and all references to public health with regards to telecommunication masts be removed from the Plan, as it will result in a loss of phone and mobile coverage and will be contrary to the Council's aim to promote and facilitate widespread telecommunications infrastructure.</p> <p>A consequence of the 100m rule will lead to a number of refusals of planning permission, all of which will be appealed, and given An Bord Pleanála's current practice, will have such a requirement rejected and permission will be granted. This will lead to unnecessary time and financial costs for the County Council, An Bord Pleanála, the operator and possible third parties.</p>	<p>ICIA 0244 Chambers</p> <p>0049 0156</p>	
<p>The proposed distance constraint applies to masts but there area also references to the 100m distance between "antennas" and residential areas etc which would rule out roof top and other unobtrusive and acceptable installations not using mast support structures as referred to in the Guidelines.</p> <p>The requirement to maintain a minimum distance of 100m between masts / antennae and residential areas, if applied as proposed, will rule out the provision/maintenance of mobile phone coverage from the very large residential areas throughout the county.</p>	<p>0049</p>	<p>Manager's Response The Planning and Development Regulations 2001-2007, Schedule 2 Part 1, Exempted Development – General, Class 31(k), provides that the attachment of antennae to (i) existing public or commercial buildings (other than education and childcare facilities or hospitals), or (ii) to existing telegraph poles, lamp posts, flag poles, CCTV poles and electricity pylons, subject to compliance with the specified conditions and limitations, is exempted development. As planning permission is not otherwise required for such installations the 100 metres rule would not apply in such cases.</p> <p>Manager's Recommendation No change recommended.</p>

<p>Recommend the inclusion of existing utilities such as street lighting, video camera surveillance camera poles, telephone boxes and bus shelters be included as possible technological solutions for the rollout of 3rd Generation Technologies and considered exempted development.</p>	<p>0156 0244</p>	
<p>It is not clear whether the reference to schools is to encompass, pre-schools, primary schools, secondary schools, special schools and third level colleges which is unjustified and would also impose excessive spatial limitations on locating or retaining base station sites.</p>	<p>0049</p>	<p>Manager's Response In the interest of clarity it is considered appropriate to amend the relevant wording in Section 2.5.8.</p> <p>Manager's Recommendation (i) Amend the third and fourth paragraphs of Section 2.5.8 to insert "primary and secondary schools and childcare facilities", in place of "schools". (ii) Amend the fifth paragraph of Section 2.5.8 to insert "residential areas/primary and secondary schools/childcare facilities/hospitals", in place of "residential areas/schools/hospitals". (iii) Amend the sixth paragraph of Section 2.5.8 to insert "primary and secondary schools/childcare facilities" in place of "schools". (iv) Replace the fourth bullet point in Section 2.5.8 with the following "That the beam of greatest intensity from a base station does not fall on any part of the grounds or buildings of a primary or secondary school or childcare facility, without agreement from the management of the school/facility and the parents of children attending the school/facility. Where an operator submits an application for planning permission for the installation, alteration or replacement of a mobile phone base station, whether at or near a primary or secondary school or childcare facility, the operator must provide evidence that they have consulted with the relevant body of the school or childcare facility."</p>
<p>There is a lack of clarity and a conflict in the wording of the draft plan. The paragraph (A) refers to "planning applications" relating to sites where</p>	<p>0049 0156</p>	<p>Manager's Response It is acknowledged that, in so far as permissions are normally granted for a temporary period of five years, the effect of the provisions in the sixth paragraph of</p>

<p>planning permission for such development has previously been granted. This statement is ambiguous as such a planning application is normally referred to as an application for retention permission.</p> <p>Paragraph (B) refers to “previous temporary grants of permission” As all permissions for telecommunications installations granted by the Council are “temporary” in that five year limits apply, this wording appears to be, in effect, the same as (A) “development that has previously been granted”</p>		<p>Section 2.5.8 is to effectively nullify the exceptions allowed under the last sentence of the preceding paragraph, and will have the effect of compelling operators to re-locate all such masts to alternative sites. It is accepted that this will impose an unreasonable burden on operators and is inconsistent with the Council's aim to promote the widespread availability of a high quality telecommunications network throughout the County. The omission of the sixth paragraph would retain the 100 metre rule in relation to proposed new mast/antennae sites only.</p> <p>Manager's Recommendation Amend the draft plan to omit the sixth paragraph of Section 2.5.8.</p>
<p>Information relating to all telecommunications structures within 1km of a proposed site. Some 90% of base stations involve the use of high buildings or co-location. While such information can be provided, it is respectfully suggested that its provision will not be of any practical benefit to the Planning Authority.</p>	0049	<p>Manager's Response The comment is noted.</p> <p>Manager's Recommendation No change recommended.</p>
<p>The planning authority is misguided in actually specifying emission standards. The determination of appropriate standards is a matter for ComReg who sets out the internationally accepted standards to be complied with.</p>	0049	<p>Manager's Response It is accepted that the determination of appropriate emission standards is a matter for ComReg. The reference to a specific standard should be omitted in the interest of clarity in this regard.</p> <p>Manager's Recommendation Amend final bullet point in Section 2.5.8 to omit the following text: “(Up to 300 GHz)”</p>
<p>Specific reference to 3G base station sites that facilitate mobile operators in the deployment of reliable 3G wireless broadband and telephony services in residential areas should be catered for</p>	0156 0244	<p>Manager's Response It is considered that provisions of the Draft Plan adequately provide for such facilities.</p> <p>Manager's Recommendation No change recommended.</p>

<p>Recommend that South Dublin County Council actively engage with mobile operators to make council properties available for shared mobile operator sites subject to the normal planning process.</p>	<p>0156 0244</p>	<p>Manager's Response The comment will be passed on to the relevant council departments for their consideration.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Vodafone would welcome the opportunity for ongoing dialogue with both County Council members and officials on a regular basis. This dialogue would present both parties with the opportunity for updates on technology development, network rollout plans for the county and other issues relating to mobile technology</p>	<p>0156</p>	<p>Manager's Response The comment is noted. Consideration will be given to facilitating such consultation with all interested operators.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Request that the temporary permission given to telecommunications infrastructure be increased to ten years or made permanent.</p>	<p>0244</p>	<p>Manager's Response The limitation of permissions to a temporary period of five years is in accordance with the national guidelines. It is considered appropriate to retain the current practice until such time as new national guidance is issued.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Contends that telephone masts should be erected no more than 100 metres away from any Hospital, School, Community Centre, Police Station and so on.</p>	<p>0245</p>	<p>Manager's Response This comment appears to be an inadvertent incorrect statement of the respondent's probable view that the minimum 100 metre rule be retained.</p> <p>Manager's Recommendation No change recommended.</p>
<p>The Provision of amelioration of visual impacts is no problem, and forms part of many applications, but is more effectively dealt with by condition.</p>	<p>0049</p>	<p>Manager's Response The comment is noted.</p> <p>Manager's Recommendation No change recommended.</p>

<p>Policy EC3 The following should be added to the policy: 'Prohibit any development which would impinge on a public right of way or walking route'.</p>	<p>0018</p>	<p>Manager's Response It is not considered appropriate to insert the proposed statement as the terms used are legally imprecise for land use planning purposes.</p> <p>Manager's Recommendation No change recommended.</p>
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6.5 A Busy Place

Enterprise and Employment

Town, District and Local Centres

Retailing

6.5.1 Enterprise and Employment

Issue	Sub No	Manager's Response and Recommendations
Section 3.2.5 Strategy		
<p>Request that Plan include a policy under the 'Enterprise Theme' to indicate its support for the provision of secure, efficient and high quality energy supply in the County.</p> <p>SDCC must ensure that strategic development plan policies accommodate economic growth rather than restrict it.</p> <p>South County Council should adopt positive employment creation policies that will support and secure future development, generating additional economic benefit for the County.</p>	<p>0233 0234 0237</p>	<p>Manager's Response The plan has set out objectives and policies (Section 3.2 of the plan) to support existing enterprise activities in the county while encouraging the growth of future economic growth. The Connected Place section of the plan sets out policies and objectives to support quality energy supply.</p> <p>Manager's Recommendation No change recommended.</p>
Section 3.2.8 Strategic Employment Location Categories EP1, EP2, EP3		
<p>The only areas that have been zoned EP1 are adjacent to Tallaght Town Centre and two areas with existing industrial buildings on the Longmile Road and at Ballymount neither of which is established as an office location. Demand patterns for offices have shown that businesses seek to locate in high quality business campuses such as Citywest.</p> <p>Seek clarification of wording of zoning objective EP1 in order to ensure development is not delayed in the absence of 'approved plans'.</p> <p>Seek clarification on the restriction of residential</p>	<p>0200 0249 0170 0251 0098 0024 0237 0168 0103 0171 0244 0250 0121 0107</p>	<p>Manager's Response The economic strategy of the Draft County Development Plan is to put in place a clear structure for promoting enterprise and employment while seeking to align intensity of employment with the provision of public transport and other services. The structure of the three zonings as outlined in the plan (EP1, EP2 and EP3) is based on this premise and on forming a coherent spatial response to the emerging smart or knowledge economy. The three Enterprise Priority zones are to be viewed in this context and in the context of the core strategy to promote sustainable development. It is our view that the spatial effects of the wider changing economic landscape will be more urbanised employment areas given the move toward export services and similar knowledge based uses that do not require large land reservations or very large single use buildings. The draft Development Plan has responded to this through designating areas EP1. However, areas currently designated EP2 may, in time, reflect more the character of the EP1 zoning.</p>

<p>development on lands zoned objective EP1 in the absence of a LAP.</p> <p>Revise zoning Objective EP1.</p> <p>Objects to the limiting of large office developments to only brownfield EP1 zoned lands as it will make the county less competitive in attracting future corporate and Foreign Direct Investment.</p> <p>Support given for the separation of the Enterprise Priority Zoning into three categories as it is compatible with the policy of the DTO.</p> <p>Recommends that no further zoning for enterprise and employment should occur until it is demonstrated that there is insufficient enterprise and employment zoned land in the County.</p> <p>There are a number of vacant commercial units within the Liffey Valley Centre, and at Rowlagh, Neilstown and Quarryvale.</p> <p>SDCC should consider and recognise the potential for commercial and industrial development alongside the existing commercial, industrial and/or mixed use residential sites and start to make provision for the servicing and infrastructural links to these existing and developing sites and facilities.</p> <p>Amend proposed EP2 zoning to permit in principle Office uses 100sq m - 1,000sqm.and Offices over 1,000sqm. or alternatively designate as "Open For Consideration</p> <p>The subject lands comprise approximately 2.04ha</p>	<p>0162 0204 0169 0205</p>	<p>Logistics/warehousing light industry and manufacturing will continue to play a vital and important role in the economic life of this county into the future. The Draft Plan recognises this through both the EP2 and EP3 zonings. The three types of economic zoning are considered vital for the county to structure a response to changing economic circumstances while supporting and maintaining existing employment. In terms of uses the bias in the zoning matrix is toward people intensive uses in Enterprise Priority One areas and land hungry uses in Enterprise Priority Three areas. In considering further lands for zoning particularly, in relation to Enterprise Priority Three areas, Development Plan policy balances the sustainable development of these lands, with the promotions of a more compact urban form and the underlying demand trend that such uses are becoming more limited.</p> <p>A key issue arising from the public consultation is the non-permitting of offices over 1,000m² in EP2 areas. Having reconsidered this matter it is recommended that this use should be moved to open for consideration subject to the inclusion of additional policies that give guidance on future consideration of proposals. It is recommended that the additional policies shall include the following: Offices over 1,000 m² in EP2 areas shall be considered in areas where the planning authority is satisfied that there is sufficient public transport provision and the scale of the office reflects the existing scale and layout of the existing area. Underground car parking will not be considered appropriate for such uses in EP2 locations. The purpose of this policy is to allow for appropriate proposals to be considered but not to undermine more suitable locations in EP1 areas or town centre locations. The policies generally reflect those in the current County Development Plan. This view has been taken notwithstanding the view of the SEA that suggests that such a measure would require a mitigating measure that the restriction of development in sites which are not served (within 400 walkband) by high quality public transport such as Metro or Luas, and restriction on car parking spaces permitted in order to make public transport the only available option.</p> <p>With regard to the quantity of land proposed for Enterprise and Employment uses it is the role of the Development Plan to facilitate future economic development within the County. The capability of movement of lower intensive uses from established areas, located in close proximity to the public transport network, to areas in the County where there are sufficient lands to promote different land uses is a priority of the</p>
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<p>and are located at the Cookstown Estate Road roundabout, 500m from the Belgard/Cookstown Road junction and a short distance from the M50 interchange. The lands are zoned for Enterprise Priority One purposes within the Draft County Development Plan 2010-2016. It is noted that the primary focus of this zoning within the Draft Plan is on the development of the lands for enterprise purposes complemented by mixed use development. It is submitted that this is not entirely consistent with the objectives for the site as set out within the Tallaght Town Centre Local Area Plan which facilitates a mixed use development of the lands with up to 70% residential development. It is therefore requested that zoning objective EP1 is amended as follows within the 2010-2016 Development Plan: 'To facilitate opportunities for intensive employment uses and/or mixed use development based on a principle of street networks and in accordance with approved plans'. It is submitted that the aforementioned amendment to the EP1 Objective would facilitate the redevelopment of the lands in accordance with the objectives set out within the Tallaght Town Centre Local Area Plan.</p> <p>Concern relating to industrial zoning where it is proposed to introduce a new element into this zoning designation whereby Offices over 1,000 sqm are not permitted.</p> <p>EP2 zoning be amended to allow for Offices in excess of 1,000 sqm to be 'open for consideration'.</p> <p>Request that there be only two Enterprise and Employment Zones (EP1 and EP2).</p>		<p>Council. These lands have been considered and the decision to rezone these lands has been made on the basis of the lands proximity to the regional and national road network.</p> <p>Manager's Recommendation New Policy: It is recommended that the additional policies shall include the following: Offices over 1,000 m² in EP2 areas shall be considered in areas where the planning authority is satisfied that there is sufficient public transport provision and the scale of the office reflects the existing scale and layout of the existing area. Underground car parking will not be considered appropriate for such uses in EP2 locations.</p> <p>Change Matrix to indicate that Offices over 1,000 m² are 'Open For Consideration' subject to the above policy.</p>
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<p>Request that the logistics/depot function of EP2 lands is protected/enhanced to ensure that such lands are developable.</p> <p>EP2 zoning is contrary to the Masterplan for Profile Park lands.</p> <p>Believes that the necessity for further rezoning of agricultural lands for industrial use in the west of the County contradicts Section 3.2.2 of the Draft Plan.</p> <p>Believes that Policy EE30 is incompatible with the rezoning of agricultural land for industrial purposes.</p> <p>Request that the existing uses on enterprise and employment zoned land should be facilitated under the proposed EP2 zoning.</p> <p>Site Airton Road, Tallaght Offices sized between 100m2-1000m2 and offices over 1000m2 should be included within the Matrix 'as permitted in principle' for land zoned EP2.</p> <p>Under Objective 'EP2' Offices over 1,000m2 and Shop-Discount Food Store are 'not permitted' uses. Request that these uses should at least be classified as 'open for consideration'.</p> <p>It is requested that the following amendments be made to the draft zoning matrix:-</p> <ul style="list-style-type: none"> • To permit in principle all classes of office development on EP 2 lands; • To include an additional office use, Offices (Class 3), to be permitted in principle on EP 1 and EP 2 lands; • To permit in principle residential 		
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<p>development on EP 2 lands, subject to a Local Area Plan.</p>		
<p>Naas Road Section 3.2.9.viii Policy EE10 Mixed-Use in Enterprise Priority One Zoned Lands</p>		
<p>Concerns relating to the density standards outlined for their lands in the Naas Road Area Development Framework.</p> <p>Do not consider that the proposed new zoning objective for Enterprise Priority One Zoned Lands or policy EE10 can be adopted before the Draft Naas road Framework is amended and re-consulted with the public.</p> <p>Request at Site of Woodies, Naas Road/Long Mile Road should have plot ratio of 2.5 and in the interest of urban design at least a six storey corner feature.</p> <p>Request by way of a policy statement that corner sites in the area should have feature landmark developments and a specific objective should designate this site as being appropriate for such development.</p> <p>Request that the 2010-2016 plan should also include an objective to facilitate the regeneration of the Naas Road Corridor and provide for a more intensive mix of urban uses which capitalise on the excellent public transport accessibility.</p> <p>In accordance with the objectives of the existing</p>	<p>0005 0048 0104 0163 0191 0169</p>	<p>Manager's Response The Naas Road LZO5 has been fulfilled through the preparation of the Naas Road Framework, which has undergone a rigorous public consultation. The framework is comprehensive in nature and in the Council's view the LZO has been finalised.</p> <p>The issues that relate to specific site concerns on lands located within the Naas Road Plan form part of the remit of the Naas Road study which went out to public consultation in 2009, furthermore the Naas Road Plan will be subject to the policies and objectives of the Development Plan and in particular the 'Sustainable Neighbourhoods' section. However, it is proposed to include a SLO reflecting the proposed public transport upgrades necessary to support the framework.</p> <p>Manager's Recommendation Insert SLO 74 Naas Road – Junction Reorganisation and new Luas Stop</p> <p>Facilitate the reorganisation and relocation of the 'Hamburger Junction' at the junction of the Nangor Road, Long Mile Road with the Naas Road traffic, to provide the potential for a new Luas Stop in accordance with the Naas Road Development Framework.</p> <p>No further changes recommended at this time.</p>

<p>2004-2010 County Development Plan, it is submitted that the 2010-2016 County Development Plan should also include an objective to facilitate the regeneration of the Naas Road corridor and provide for a more intensive mix of urban uses which capitalise on the excellent public transport accessibility. The opportunity exists to provide for significant elements of housing, employment and community uses that meet the needs of the expanding Dublin Metropolitan area in a highly sustainable manner.</p> <p>Local Zoning Objective 5 'N7 Gateway Corridor Upgrading' be retained in the new Development Plan insofar as it relates to the area extending from Newlands Cross to the M50 Interchange.</p>		
<p>Urban Design Considerations Section 3.2.10</p>		
<p>Support for Policy EE16.</p>	<p>0250</p>	<p>Manager's Response The support has been noted.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Tourism Section 3.2.14 Policies EE27 EE29</p>		
<p>Would like the Plan to contain a clear cross referencing of policies between the various chapters that affect Tourism and the specific Tourism chapter.</p> <p>Requests more reference to other documents or bodies concerned with Tourism and the need for close working relationships to be included in the Plan.</p>	<p>0014 0262 0018 0071</p>	<p>Manager's Response Policy EE25 seeks cooperation between the council and the County Development Board and other appropriate agencies. Policies and objectives have been included throughout the plan that protects natural resources which will in turn support tourism within the County. The Council will support tourism innovation and entrepreneurship throughout the county in appropriate locations and any proposals will be subject to a landscape assessment and a rationale will be expected for any proposed development above the 120m contour or within high amenity zoned lands or as well be considered appropriate in other lands. Proposals for tourism development within the county will</p>

<p>Would like the inclusion of the following policies:</p> <ul style="list-style-type: none"> • Promote and foster a growing sense of innovation and entrepreneurship in the tourism sector. • Encourage and support increased coordination, cohesion and linkages between agencies such as Failte Ireland and Dublin Tourism, Waterways Ireland, the Regional Fisheries Board and the Dublin Regional Authority. • Protect the natural resources upon which tourism is based through the enforcement of policies in relation to resource protection; landscape character assessment; architectural conservation areas; bogs; water quality; biodiversity; rural housing development. • Require applications for new tourism development to be assessed against a sustainable tourism planning checklist. • Evaluate public transport provision and where appropriate provide support for alternatives to the use of private cars to access visitor attractions. • Investigate and support best-practice environmental management including energy efficiency, waste management procurement and recycling in accommodation providers and tourism enterprises in the County. 		<p>also be subject to the Sustainable Neighbourhoods section, Town District and Local Centre section and other relevant sections within the plan.</p> <p>A sustainable tourism planning checklist was sought but with no clarification of what this would entail. Issues relating to sustainable tourism are wider than the scope of the Development Plan. However, the plan does seek to support tourism opportunities within the county.</p> <p>The request to amend Policy EE27 to indicate that Citywest Campus will be a designated location for 'Major Leisure Facilities' is a zoning matter and will be dealt with under the Zoning Section, Map 3, of this report.</p> <p>There was support for policy EE29</p> <p>Manager's Recommendation No change recommended</p>
<p>Agriculture Section 3.2.16</p>		
<p>The following should be included: 'To consider land use and agriculture in a new light since the introduction of the Single Payments Scheme....'</p> <p>The large areas of agricultural land proposed to be rezoned to industrial conflict with Policy EE30. The Council should be actively seeking to promote the commercial growing of food locally, in the interest</p>	<p>0018 0158</p>	<p>Manager's Response Section 3.2.16 of the Draft Plan sets out the background to land use within the County in relation to agricultural enterprise. Policies EE29-EE33 seek to protect the viability of agriculture and horticulture within the County, the facilitation of rural related enterprises, support sustainable development of agricultural diversification and the protection of agriculture and agri-business uses.</p> <p>The Single Payments Scheme is part of EU Council Regulations (1782/2003) and</p>

<p>of sustainable local employment, wider food sustainability and security issues and the environment.</p>		<p>deals with payments to farmers subject to conditions. This is not a Development Plan matter.</p> <p>Manager's Recommendation No change recommended</p>
<p>Extractive Industry Section 3.2.18 Policies EE37 EE36</p>		
<p>Oppose extensions to local quarries.</p> <p>The Plan should contain a specific acknowledgement of the potential impact of rural housing on the exploitation of natural resources in Sections 3.2.18 and the Rural Housing Section.</p> <p>Support for Section 3.2 and particularly Section 3.2.18.</p> <p>Support for Policy EE37.</p> <p>Section 3.2.18, regarding the commitment to restrict incompatible development that would interfere with the efficient development of resources should be strengthened into a formal policy such as EE38.</p> <p>The following guidelines should be noted in the Plan: The Quarry Planning Guidelines, the ICF Environmental Code of October 2005; DEHLG/ICF Archaeological Code of Practice; GSI/ICF Guidelines for Geological Heritage; NPWS Guidance on Biodiversity.</p> <p>There should be a requirement to submit more</p>	<p>0100 0098 0018</p>	<p>Manager's Response</p> <p>It is considered that the policies and objectives contained within Section 3.2.18 and 3.2.19 recognise the importance of the extractive industry in providing the aggregates and building materials required and will facilitate its operation in suitable locations, having taken into account the continued reduction in demand with the increased recycling of construction and demolition waste. However, permission will only be granted where the Council is satisfied that residential and natural amenities will be protected, pollution will be prevented and aquifers and ground water safeguarded.</p> <p>In relation to the issue raised that less exhaustive reports be requested with regards to Architectural Heritage the point is noted and it is agreed that a common sense approach should be taken for certain instances where an item of architectural heritage is some distance from the quarry area. However if it is evident that a feature of architectural heritage will be impacted upon or is within such a distance that would be affected by any work relating to the quarry then specific details should be submitted i.e. Architectural Impact Assessment. It should be noted that under the Planning and Development Act 2000 and under the Architectural Heritage Protection Guidelines certain particulars are required for any development involving a Protected Structure or architectural heritage feature.</p> <p>The road network can be viewed on the Development Plan maps.</p> <p>Contributions are not a matter of the Development Plan and are dealt with under the recently approved Section 48 of the Planning and Development Act 2000-2009.</p> <p>Manager's Recommendation</p>

<p>imaginative restoration plans.</p> <p>Requests that less exhaustive reports be requested with regards to Architectural Heritage and the impact of a quarry development.</p> <p>While quarries are a temporary use of the land, the term of usages will generally be upwards of 20 years and the planning permission should be for a term commensurate with the extraction period. This should be noted within the second last point in Section 3.2.5.</p> <p>States that the County road network has not been defined within the draft Development Plan and therefore requests that Policy EE5, which relates to the road network, be clarified.</p> <p>Road contributions should be based on a balance on impact of all road users so as not to unjustly penalise an authorised quarry development.</p> <p>EE36 The following should be added: 'Prohibit any development which would impinge on a public right of way or walking route.'</p>		<p>No change recommended.</p>
<p>Section 3.2.20</p>		
<p>There is no equivalent statement recognising the strategic location of Weston Aerodrome similar to that for Casement Aerodrome.</p>	<p>0241</p>	<p>Manager's Response It is considered that the Draft plan, through Policies EE40 and EE42 as well as Sections 3.2.20 Aerodromes and 3.2.22 '<i>General Guidance for Development in the Vicinity of Aerodromes</i>', makes appropriate provision for Weston Aerodrome.</p> <p>Manager's Recommendation No change recommended.</p>

<p>Section 3.2.21</p> <p>It is requested that a consistent approach be developed and adopted between the two adjacent planning authorities (South Dublin and Kildare) to facilitate coordinated development of infrastructure appropriate to an executive airport. This may be achieved by way of a policy statement, as follows:</p> <p><i>'The Council recognises the strategic location of Weston Aerodrome in the County and within the Metropolitan Area and its proximity to the rapidly developing major enterprise and employment areas e.g. Grange Castle, Citywest and Greenogue and Intel and Hewlett Packard in County Kildare as an area of regional and national importance'.</i></p>	<p>0241</p>	<p>Manager's Response</p> <p>It is considered that the Draft plan, through Policies EE40 and EE42 as well as Sections 3.2.20 'Aerodromes' and 3.2.22 'General Guidance for Development in the Vicinity of Aerodromes', provides an adequate indication of the use of the lands that would be supported by the Council.</p> <p>Manager's Recommendation</p> <p>No change recommended.</p>
<p>Policy EE39: Restriction Area at Baldonnell Airport</p>		
<p>Request the removal of the security zone restriction designation of the Draft Plan as it applies to the subject lands, in conjunction with the implementation of proper security and safety measures in accordance with national and international standards and best practice.</p> <p>Dáil Debate Answers by the relevant Ministers for Defence confirm that (a) the regulation of development in the environs of the Aerodrome is entirely in the control of SDCC and (b) the Department of defence has never utilised its powers under Section 36 of the 1954 Defence Act, nor does it look likely that it ever will – in this regard the Department of Defence appears to have abdicated its powers to control development to SDCC and the planning system. (c) rationale of the</p>	<p>0129 0217 0244</p>	<p>Manager's Response</p> <p>South Dublin County Council Planning Staff have met with the Department of Defence regarding various matters relating to Casement Aerodrome including the restricted area. They confirmed that following a 'threat assessment', the restricted area has been slightly reduced in extent. The Department has clarified its position in writing, as follows:</p> <p><i>'The retention of the restricted area is imperative to allow for the utmost security to be in place when required.....Casement Aerodrome is used for the highest level intergovernmental tasks, for sensitive extraditions and as the point of arrival and departure of security sensitive VIPs. The State Authorities with responsibility for security have carried out an assessment of possible threats that could arise at the aerodrome. This assessment has resulted in a reduction to 400m of the area required to provide that security. In this regard, the recommendation is that as aircraft are at their most vulnerable when landing or taking off, this restricted area is required to ensure that any new buildings would not allow the deployment of small arms or short range surface to air missiles against the manoeuvring area of the aerodrome'.</i></p>

<p>exclusion zone does not justify the need for a Security Zone which is of no relevance to flight safety or to safeguarding members of the public.</p> <p>Request that the Council set out the basis on which the Security Zone was amended and request that the Council re-examine the Security Zone again in light of the safety and security reports submitted by the Chamber of Commerce in January 2009.</p>		<p>In relation to comparisons with military airports in other jurisdictions, the Department of Defence states <i>'Unlike other countries.....Ireland has only one military airfield to provide maximum security for flights. While examples of military airfields with limited security requirements can be referenced, it is the case that the Governments concerned have available to them other military facilities where security at a much higher level than envisaged at Baldonnell can be provided.'</i></p> <p>Manager's Recommendation Retain the restricted area designation, and incorporate boundary revisions in Development Plan maps (following provision of information by the Department of Defence).</p>
<p>The retention of the restricted area around Casement Aerodrome is welcomed by the Department of Defence.</p>	<p>0218</p>	<p>Manager's Response Noted</p> <p>Manager's Recommendation No change recommended</p>
<p>That Policy EE39 be amended to add the words <i>'and unzoned land be considered for rezoning'</i> to the end of the policy statement.</p> <p>Request that Policy EE39 be amended to read: <i>'It is the policy of the Council to again negotiate with the Department of Defence with the aim of reducing the no development restriction area at Baldonnell Airport to that of norm at international airports generally, thus allowing some currently zoned lands to be opened up for use and unzoned land to be considered for rezoning'</i>.</p> <p>Policy EE39 should be removed as there is plenty of industrial zoned land in the county and if the Council zones land for development in the</p>	<p>0190 0228 0158</p>	<p>Manager's Response Policy EE39 relates to the possibility of negotiation between the Council and the Department of Defence regarding reducing the no development restriction area at Baldonnell Airport and therefore allowing some currently zoned lands to be opened up for use.</p> <p>South Dublin County Council Planning Staff have met with the Department of Defence regarding various matters relating to Casement Aerodrome including the restricted area. They confirmed that following a 'threat assessment', the restricted area has been slightly reduced in extent. The Development Plan Index Map will be revised to take account of this following receipt of details from the Department of Defence.</p> <p>In addition, in the <i>'Review of Policy at Casement Aerodrome, Baldonnell, Co. Dublin'</i> (January 2009), Public Safety Zones have been introduced within the existing 'red zones'. No development whatsoever is permitted within the Public Safety Zones.</p>

<p>restricted zone and then it cannot be developed, that is not the fault of the Department of Defence as it is a military airport.</p>		<p>However, where previously no development would have been allowed within the 'red zones', following the revision, some development is permissible whereby the development could not reasonably expect to increase the number of people working or congregating in or at the property such as the extension of an existing dwelling or a change of building use. However new developments with a high intensity of use would continue to be prohibited. Height restrictions would continue to apply to developments in the environs of the Aerodrome.</p> <p>The two revisions described above when taken together, have the effect of slightly reducing the 'no development' restriction area. It is considered that no change to policy EE39 is justified.</p> <p>Manager's Recommendation No change recommended</p>
<p>Welcome Policy EE39 of the Draft Plan. Support for Policy EE39.</p>	<p>0129 0244</p>	<p>Manager's Response Noted</p> <p>Manager's Recommendation No change recommended</p>
<p>Policy EE41 should be removed. Promoting an increase in civilian air transport is contrary to national and international aims to reduce greenhouse gas emissions, and would also detract from the amenity value of the Dublin Mountains and other leisure and recreational facilities in this area.</p> <p>Object to SDCC policy of opening of Casement Aerodrome Baldonnell to civil aviation due to risks to public safety.</p>	<p>0158 0123</p>	<p>Manager's Response Policy EE41 states that <i>'it is the policy of the Council to promote the development of Casement Aerodrome, Baldonnell for joint military/civilian uses'</i>. This policy is in recognition of the strategic location of Casement Aerodrome in the County and within the Metropolitan Area, and in proximity to rapidly developing enterprise and employment areas e.g. Grange Castle, Citywest and Greenogue</p> <p>Draft Plan policy is not to open Casement Aerodrome to civil aviation, but rather, to examine the potential for the development of the aerodrome for joint military/civilian use in co-operation with other relevant authorities. This is in recognition of its strategic location in the County and within the Metropolitan Area.</p> <p>Manager's Recommendation No change recommended</p>
<p>Section 3.2.22</p>		

<p>It is requested that the description and mapping, provided by Weston Executive Aerodrome, referring to the existing airspace safeguarding area controlled by IAA, be incorporated into the new County Development Plan as part of updating Schedule 5.</p>	<p>241</p>	<p>Manager's Response On behalf of Weston Executive Airport, amendments are proposed in order to update the content. The revisions that are being recommended at present will be the subject of further scrutiny by the Council's aviation consultant. Should further changes be necessary, these will be carried out by way of Manager's amendments to be introduced at a later date before adoption of the Plan.</p> <p>Manager's Recommendation Section 3.2.22; first paragraph; delete text '<i>Drawing No. EDAX 9702/CO9 Revision 1 (to a scale of 1:10,000) prepared by Aer Rianta Technical Consultants and lodged by Weston Aerodrome with the Council in pursuance of a direction issued by the Irish Aviation Authority (NTR.02 – 27/08/1998)</i>' and insert replacement text '<i>Drawing – 'Safeguarding Map for Weston Aerodrome' (to a scale of 1/10560) prepared by GPS Surveying Ltd. of Newmarket House, Co. Cork dated 10 January 2003 and lodged by Weston Aerodrome with South Dublin County Council in pursuance of a direction issued by the Irish Aviation Authority (NR T.02 Issue 4 Date 02.09.04 – Aerodrome Safeguarding Maps) in [pursuance of Articles 8 and 23 of the Irish Aviation Authority (Aerodromes and Visual Aids) Order, 2000, (S.I. No. 334 of 2000)</i>'.</p>
<p>The main alteration to Air Safety Policy is the introduction of Public Safety Zones within the existing "red zones" following the '<i>Review of Policy at Casement Aerodrome, Baldonnell, Co. Dublin</i>' (January 2009). No development whatsoever is permitted within the Public Safety Zones. However, where previously no development would have been allowed within the 'red zones', following the revision, some development is permissible whereby the development could not reasonably expect to increase the number of people working or congregating in or at the property such as the extension of an existing dwelling or a change of building use. However new developments with a high intensity of use would continue to be prohibited. Height restrictions would continue to apply to developments in the environs of the</p>	<p>0218</p>	<p>Manager's Response Development Plan policy, Schedule 4, and the Index map require to be amended to reflect changes introduced by the Review document. The Index map will be revised following receipt of information from the Department of Defence.</p> <p>Manager's Recommendation Paragraph 3.2.22: Delete the following text: <i>'In the six inner Approach Areas to Casement and Weston Aerodromes (coloured solid red on the Development Plan Index Map) and in the Casement Aerodrome Security Zone (coloured grey on the Development Plan Index Map), no new development is permitted'</i>.</p> <p>Paragraph 3.2.22: Insert the following replacement text: <i>'In the document 'Review of Policy at Casement Aerodrome, Baldonnell, Co. Dublin' (January 2009), Public Safety Zones have been introduced within the existing 'red zones'. No development whatsoever is permitted within the Public Safety Zones. However, within the 'red zones', some development is permissible whereby the</i></p>

<p>Aerodrome.</p>		<p><i>development could not reasonably expect to increase the number of people working or congregating in or at the property. This may include development such as the extension of an existing dwelling or a change of building use. However new developments with a high intensity of use would continue to be prohibited. Height restrictions would continue to apply to developments in the environs of the Aerodrome. In the inner Approach Areas to Weston Aerodrome (coloured solid red on the Development Plan Index Map), no new development is permitted'.</i></p>
<p>Major Accidents Directive Section 3.2.23</p>		
<p>The submission advises that the approach adopted by the Health & Safety Authority to land use planning is set out in the Authority's document "Policy and Approach of the Health & Safety Authority to COMAH Risk-Based Land-Use Planning". It advises that the Authority would expect guidance in the development plan to include the following:</p> <ul style="list-style-type: none"> • An indication of planning policy in relation to major accident hazard sites notified under the regulations which reflects the intentions of Article 12 of the Directive 105/2003/EC; • The consultation distances supplied by the Authority in relation to such sites to be indicated on the relevant maps, in addition to any more specific distances and advice supplied by the Authority; • A policy on the siting of new major hazard establishments taking account of Article 12 and the published policy of the Authority in relation to new developments, including developments in the vicinity of such establishments; 	<p>0285</p>	<p>Manager's Response The Major Accidents Directive as contained in the plan is guided by the policies and objectives contained within Sections 3.2.23 and 3.2.24 and these are considered to be sufficient for the direction of SEVESO developments within the County.</p> <p>The consultation distances supplied by the HSA in relation to major accident hazard sites will be incorporated within the plan and will be indicated on the Development Plan maps.</p> <p>Manager's Recommendation The consultation distances, contained within Table 3.2.1 will be changed to represent the figures furnished by the HSA to incorporate the following: Irish Distillers – Consultation Distance 300m Tibbet&Britten Group Ltd – Consultation Distance 300m BOC – Consultation Distance 700m</p> <p>Furthermore, the locations of the SEVESO sites will be mapped on the Development Plan maps.</p>

<ul style="list-style-type: none">• Mention of sites and specified consultation distances at BOC Gases Bluebell, and Irish Distillers and Tibbett & Britten at Robinhood Road Clondalkin. <p>The submission advises that the consultation distances listed in the development plan are incorrect, and advises the Authority's proper title, and that the Council Directive 96/82/EC was amended by Directive 2003/105/EC</p>		
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6.5.2 Town, Districts and Local Centres

Issue	Sub No	Manager's Response and Recommendations
DISTRICT CENTRES Section 3.3.4		
<p>The provision for the creation of district centres in sustainable, populated parts of the County should be seriously considered and supported by the Council for insertion into the development plan in order to maintain employment opportunities and provision of services to the 'local' economy.</p>	0237	<p>Manager's Response The Draft Plan has set out a hierarchy of town, district and local centres to accommodate the retail and social needs of the population of the County. These centres have been located where there is suitable need and where consolidation can be accommodated. It is considered that the hierarchy is appropriate for the requirements of the County over the Plan period.</p> <p>Manager's Recommendation No change recommended.</p>
TALLAGHT Section 3.3.5 and 3.3.6		
<p>There is a large amount of vacant properties, retail outlets, factories and apartments in Tallaght.</p> <p>Policy TDL8 Tallaght By Pass- should not proceed until a traffic survey is carried out with respect to morning and evening peak time's traffic, as traffic backing up on the N81 is causing disruption to other traffic.</p> <p>Request that no more apartments be developed in Tallaght area especially over four stories.</p> <p>Object to any further apartment development in Tallaght.</p> <p>Set up a unit to liaise with all owners of property in Tallaght Town Centre, Including NAMA re: security, taking in charge, transfer of property to the Council</p>	<p>0025 0130 0065 0101 0110 0111 0112 0115 0056 0032 0062 0077 0088 0102 0116 0176 0177 0178</p>	<p>Manager's Response Development within the Tallaght area will be subject to the Tallaght Town Centre Local Area Plan 2006 and will allow for the intensification and expansion of the urban environment. Tallaght will be promoted as a vibrant and desirable place to live, work and visit, with quality housing and community and cultural facilities. Building heights will be appropriate to the network of streets, squares and gardens. Furthermore the Local Area Plan notes sites for which a further masterplan-conservation plan is required, which includes the Square development.</p> <p>Policy TDL8 makes it clear the intention of the Council with regards to the Tallaght By-Pass. The policy states that the Council will investigate and prepare a plan for major environmental upgrading and traffic calming of the N81.</p> <p>The setting up of a liaison unit is not a Development Plan matter.</p> <p>It is the policy of the council to secure the future development of Tallaght Town Centre through the provisions of the Tallaght Town Centre Local Area Plan (2006) which directs the development of the residential, enterprise and employment, the</p>

<p>etc.</p> <p>That a CPO be used on land in Tallaght village to provide for Green Open space, which was not provided when apartment development took place.</p> <p>Objection to 'flats being developed to the rear of the estate- too many flats around Tallaght- no need for them.</p> <p>Objection to potential development at Balrothery, Tallaght- Tallaght has too many apartments, more vacant apartments are not needed.</p> <p>Promote Tallaght as an Education City.</p> <p>Welcomes the commercial development of the Square, but does not welcome it if it means more apartments for Tallaght.</p> <p>Need to revisit the issue raised Cllr Crowe- Motion 178 regarding revitalisation of Tallaght Village.</p> <p>Need for Senior Management to listen to community regarding Tallaght Town Centre. Issues relating to Tallaght LAP; development on Main Road, Disappearing Pocket Park No further apartment development should take place within Tallaght until 85% of existing apartments have been filled.</p> <p>Proliferation of high rise apartment development over the past few years, especially in Tallaght Village and Tallaght in general, has been a negative thing. The concerns of the community were ignored in relation to this in the preparation of</p>	<p>0179 0180 0192 0157 0181 0182 0183 0184 0185 0186 0188 0189 0139 0059 0162</p>	<p>retail and cultural aspects of the town.</p> <p>Manager's Recommendation No change recommended.</p>
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<p>the existing Development Plan. Because of the issue of uninhabited apartments, there should be no new apartments granted permission in Tallaght Town Centre until the occupancy of existing apartment blocks is above 85%. This should also apply to the redevelopment of the Square.</p> <p>Suggests rezoning all undeveloped land on the Main Road from Tallaght Village to the site of Brian S Ryan to lower density levels, restricting building height to two storeys, in line with residential units nearby and setting back any development from the existing Main Road.</p> <p>Suggests excluding any apartments blocks; at the minimum any apartment block should be no more than 2 stories high; and 1 bed apartments should be excluded.</p> <p>Reinstate the Pocket Park that was previously allowed for in the zoning of the Main Road at the site of MPI (now Lidl). The Esso site (now derelict) should be rezoned or if necessary a land swap done in order for SDCC to take ownership of the site in order to provide community facilities.</p> <p>In light of the departure of Fruitfield from Tallaght and the clear intention to enter the property business instead of keeping jobs in Tallaght, the Council should dezone the Blessington Road site or else cut a deal with Fruitfield whereby the Belgard Road site should be zoned for educational, hospital or community purposes. The Council should ensure that under no circumstances is the Belgard Road property rezoned to a use that will allow profit taking at the expense of Tallaght jobs.</p> <p>The subject lands comprise approximately 2.04ha</p>		
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<p>and are located at the Cookstown Estate Road roundabout, 500m from the Belgard/Cookstown Road junction and a short distance from the M50 interchange. The lands are zoned for Enterprise Priority One purposes within the Draft County Development Plan 2010-2016. It is noted that the primary focus of this zoning within the Draft Plan is on the development of the lands for enterprise purposes complemented by mixed use development. It is submitted that this is not entirely consistent with the objectives for the site as set out within the Tallaght Town Centre Local Area Plan which facilitates a mixed use development of the lands with up to 70% residential development. It is therefore requested that zoning objective EP1 is amended as follows within the 2010-2016 Development Plan: 'To facilitate opportunities for intensive employment uses and/or mixed use development based on a principle of street networks and in accordance with approved plans'. It is submitted that the aforementioned amendment to the EP1 Objective would facilitate the redevelopment of the lands in accordance with the objectives set out within the Tallaght Town Centre Local Area Plan.</p> <p>Revise zoning of lands at main Road, Tallaght to lower density level.</p> <p>Restrict new planning permissions for apartments in Tallaght Town Centre until existing apartments are occupied.</p> <p>There is a need for the value and formal recognition of the importance of the heritage Tallaght holds and offers the County to be</p>		
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<p>endorsed at the highest levels and a specific local objective for Tallaght should be included. The recently formally identified conservation area includes rich built legally protected structures and lends itself as an area that should house the museum. SDCC should proactively engage with the relevant Government Departments and agencies to secure funds for a heritage centre for the County and for Tallaght.</p> <p>Suggest addition to Section 3.3.6.ii The Square; "This Council shall prepare a Plan for the area in and around The Square, Tallaght, with a view to its future re-development incorporating the following objectives – • The undergrounding of all car-parking; • The development of the area surrounding The Square as an attractive town centre, incorporating landscaping and social amenities."</p> <p>Suggest if lands at Jacobs factory site are not rezoned from EP2 to EP1 alternatively include the uses: shop-discount (foodstore)-OPEN FOR CONSIDERATION, office 100-1,000sqm-PERMITTED IN PRINCIPLE and greater than 1,000sqm- PERMITTED IN PRINCIPLE, recreational building (commercial)- PERMITTED IN PRINCIPLE, health centre and education-PERMITTED IN PRINCIPLE.</p> <p>Site Airton Road, Tallaght Shop-discount food store should be included within the Matrix as 'open for consideration' for land zoned EP2.</p>		
<p>CLONDALKIN Section 3.3.7</p>		
<p>Request that the Council endeavour to develop the round tower heritage site with lecture theatre,</p>	<p>0245 0288</p>	<p>Manager's Response Section 3.3.8 of the Draft Plan states that it is an objective of the Council to prepare</p>

<p>gardens.</p> <p>Request that Clondalkin town centre be pedestrianised with Irish only signs.</p> <p>Request more linkage from Clondalkin to third level colleges at Tallaght and Maynooth.</p> <p>Request that waste ground at the corner of the 9th Lock Road and New Nangor Road be planted and provided with a sign for the Round Tower and should say 'Failte go dti Cluain Dolcain'.</p> <p>The area around the Clondalkin Round Tower to be developed into an historical park.</p>	<p>0281</p>	<p>an Urban Design Framework for the development of lands and sites in and around the town centre and adjacent to the Mill Centre, to protect and strengthen the role of the town as a strong urban retail centre, to conserve the historic village core, to address the issue of underdevelopment and lack of cohesiveness in the urban area and to promote and facilitate the Metro West Proposals, Quality Bus Corridors and traffic calming/management. This framework plan will demonstrate how movement is intended to take place within the town, including public transport links and pedestrian and car pathway and will ensure that the historical centre of Clondalkin will be sensitively planned for in the future.</p> <p>The issue of types of signage relates to detailed matters which are not necessarily Development Plan concerns. However, the Plan facilitates signage both in English and in Irish.</p> <p>Manager's Recommendation No change recommended</p>
<p>LIFFEY VALLEY TOWN CENTRE Section 3.3.9</p>		
<p>Section 3.3 referring to Town District and Local Centres makes no reference to Liffey Valley, an existing town for which an LAP was adopted in 2008 to develop it into a Major Town in South County Dublin- already designated one of the two Major Town Centres in the County- Proper status and recognition should be afforded to Liffey Valley.</p> <p>Local Area Plan for the Liffey Valley Town Centre lands be fully integrated into and will apply in the new Development Plan.</p>	<p>0068 0167</p>	<p>Manager's Response Sections 3.3.9 and 3.3.10 set out the Council's position on Liffey Valley Town Centre. It is the policy of the Council to facilitate a high quality urban design based town centre development at the Liffey Valley Shopping Centre, which will be carried out in accordance with the 'Liffey Valley Town Centre Local Area Plan' (2008). It is therefore considered that Liffey valley Town Centre has been accorded proper status and recognition within the Plan.</p> <p>Manager's Recommendation No change recommended.</p>
<p>SDZ Section 3.3.11 and 3.3.13</p>		
<p>The Plan should promote the application of standard impact assessment methodology for all such development (proposed development with potential to impact adversely on significant</p>	<p>0254</p>	<p>Manager's Response The SDZ areas contained within the Plan are not proposed but exist under their own planning schemes. The SDZ areas are subject to approved planning schemes, which have undergone public consultation processes including oral hearings. In</p>

<p>landscape features). This may be of particular relevance in the context of the proposed SDZ areas referenced in the Plan.</p> <p>The Plan should include a specific objective requiring the development by the local authority, in association with relevant key stakeholders, of an "Integrated Phase Implementation Plan/Programme for Critical Water, Surface Drainage and Waste Water related infrastructure" to service the SDZ areas of Adamstown and Clonburris. Such a Plan/Programme should take into account the Phasing of the development of the SDZ areas and the vulnerability/Water Framework Directive Risk Categories of the receiving waters in the zone of influence of the SDZ areas and the water and wastewater related infrastructure servicing these areas. The proposed implementation and phasing of the SDZ areas should also take into account any revisions to population/targets likely to be allocated via the Regional Planning Guidelines currently under review.</p>		<p>addition to this, Clonburris was subject to a detailed Strategic Environmental Assessment.</p> <p>Adamstown and Clonburris Strategic Development Zones were designated under an Act of Oireachtas. Detailed Planning Scheme Documents (which are statutory documents) indicating development type and extent, design, transportation infrastructure, provision of services on the site, proposals to minimise the effects of development and the amount of community facilities required to serve development were detailed in the Planning Schemes, which went through substantive public consultation and An Bord Pleanala Oral Hearing Processes. Each Planning Scheme carefully phased development to take place in tandem with or ahead of development. Strategic Development Zones operate independently of the Development Plan, however development would be cognisant of environmental constraints and bound by issues contained within the Water Framework Directive.</p> <p>Manager's Recommendation No change recommended.</p>
<p>VILLAGES Section 3.3.23</p>		
<p>Objection to further residential development on west side of Rathcoole- in close proximity to L Behan and Sons Ltd. Quarry</p> <p>Rathcoole should have a policy of protection of existing key buildings with the appropriate mandate to ensure that the character of the village notably the main street is maintained.</p> <p>Policy 3.3.23 - Currently proposals for new developments, and built structure such as Eaton</p>	<p>0033 0154 0281 0107</p>	<p>Manager's Response</p> <p>The draft plan sets out the council's position on the importance of the County's villages and how they are to be consolidated and expanded. It is the policy of the Council (TDL24) to provide planning frameworks, through approved plans, for the consolidation and expansion of the County's villages, which will encourage and direct their growth. Furthermore it is a policy (TDL25) that all new development in the historic and rural villages should be of a high quality design and layout and to an appropriate scale and density. It is considered that the draft plan has made provision for all the concerns raised in the submissions and that the production of village frameworks/approved plans during the lifetime of the plan will ensure that villages meet the demands of modern life in a way that is sensitive and responsive to the</p>

<p>Court [Rathcoole] are out of scale and mass with the vernacular building on Main Street</p> <p>The villages of Brittas, Saggart and Rathcoole to be designated as a rural village and growth centre; certain vernacular buildings in these villages to be designated as protected structures</p> <p>Policy TDL23 Requests that the word 'urban' be replaced with the word 'rural' in Policy TDL23.</p>		<p>past.</p> <p>The word 'urban' was used within policy TDL23 in this instance to ensure that development within the county's villages would be subject to the 'Sustainable Neighbourhood' Section of the Plan. It is agreed that the term 'urban' should be omitted from Policy TDL23, subject to an amendment to the policy to link it back to the Sustainable Neighbourhoods section of the plan.</p> <p>Manager's Recommendation It is recommended that policy TDL23 should therefore read:</p> <p>"It is the policy of the Council that all new development will consolidate the existing character of village settlements within the County and will be subject to the Sustainable Neighbourhoods section of the plan."</p>
<p>LOCAL CENTRES Section 3.3.36 Urban Design Considerations for Local Centres</p>		
<p>Seek clarification that the 'masterplans' required to be prepared for Local Centre lands may be developed by or for landowners rather than the Planning Authority.</p> <p>Policy TDL35 should be amended to recognise the role of convenience retailing in sustaining the vitality and viability of local centres.</p>	<p>0249 0250</p>	<p>Manager's Response The Council has looked at being both prompt and efficient in the preparation of approved plans and in the pursuance of reaching the objectives of the Development Plan. Each 'masterplan' area will be investigated as part of the context of the plan and the redevelopment of these sites will be based on the opportunities afforded from them. Notwithstanding how the plans are drafted the final decision on the plans will be a matter for the Council and what it considers to be an approved plan.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Brittas -</p>		
<p>Requests that Brittas be designated as a rural village and growth centre and should be zoned accordingly.</p> <p>Request that modest development be allowed within the Brittas area in order to preserve the</p>	<p>0071 0235</p>	<p>Manager's Response It is a Specific Local Objective to carry out a planning study of the Brittas Village area which will have regard to the implications of the proposed Natural Heritage Area designations on the areas. It is considered that the findings of this study will direct the future of the Brittas area, subject to the policies and objectives of the development plan.</p>

<p>village. Given this proposal community facilities, a community centre, a health centre, retail outlets and possibly a petrol service station would be required to reflect the resulting population growth.</p> <p>Request that Brittas be designated as a Rural Village and Growth Centre</p>		<p>Manager's Recommendation No change recommended.</p>
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6.5.3 Retailing

Issue	Sub No	Manager's Response and Recommendations
Retail Hierarchy Section 3.4.3		
<p>It is respectfully submitted that Clonburris should be designated as a Level 2 Major Town Centre in accordance with the Inspector recommendations on the Clonburris SDZ Planning Scheme or at least a Level 3- Town Centre.</p> <p>Section 3.4.3.iv Request clarification whether the references to Local Centres refer specifically to the map based 'Local Centre' zoning objective. The map based local Centre Zoning objective would have significantly greater levels of existing floorspace.</p> <p>Section 3.4.3.iii Request clarification on the location of specific Neighbourhood Centre zoning and why foodstores in excess of 1,500m2 are permitted here and not within Local Centres.</p> <p>Request that Rathfarnham Shopping Centre and Hillcrest Shopping Centre be upgraded to District Centre or a more flexible zoning to facilitate their future development.</p> <p>Request that more District Centres be designated within the Plan: Local Centres that have significant levels of existing retail floorspace and that are in need of rejuvenation should be upgraded to 'District Centres'. At the very least provision should be made for a scale of development between Local Centres and District Centres.</p>	<p>0225 0250 0118 0162 0140</p>	<p>Manager's Response</p> <p>The Draft Plan incorporated the hierarchy of retail centres for South Dublin County as it is set out by the Retail Strategy for the Greater Dublin Area 2008-2016 as a result it is not considered appropriate or necessary to make changes to individual centres or to incorporate new levels within this hierarchy.</p> <p>'LC' zoning refers to section 3.3.15 Local Centres of the Draft Plan, which aims to maintain a balance of appropriate commercial, service and residential uses whereas Section 3.4.10.vii Policy S7 Local Centres relates specifically to the retail capacity within these centres.</p> <p>The point regarding 'Shop Major Sales Outlet' being included in the 'not permitted' category of the Local Centre zoning objective is not considered appropriate given that the scale of these uses would not generally be appropriate to the zoning.</p> <p>Manager's Recommendation</p> <p>Section 3.4.3.iii Neighbourhood/Small Town/Village Centre will be amended as follows Small Town/Village Centre "These centres usually provide for one supermarket or discount foodstore generally ranging in size from 1,000-1,500m2 with a limited range of supporting shops and retail services, cafes and possible other services such as post offices or community facilities or health clinics grouped together to create a focus for the local population.</p>

<p>States that there is a discrepancy in the urban and retail hierarchy where centres such as Palmerstown, in reality, fall between the definitions of a District Centre and a Local Centre (as it is designated). Request a new retail level that sits between Local Centre and District Centre.</p> <p>Request that the zoning matrix for Objective A be amended so that "Shop-Discount Food Store" be moved to "Open for Consideration".</p> <p>Request that Offices over 1,000m2 and Shop Major Sales Outlet are made 'Open for Consideration' for LC zoning.</p>		
<p>Scale and Location of Retail Developments Section 3.4.6</p>		
<p>Request that the location and scale of retail facilities be determined by an assessment of floorspace need and qualitative benefits such as improved accessibility.</p> <p>Request a single off-licence for a population of no more than 10,000.</p> <p>Policy S22 Request that the specific location of the alcohol sales area within a convenience retail unit should not be restricted to a 'designated' location.</p> <p>Support for Section 3.4.6 of the Plan.</p> <p>Support for Policy S29. Request that the Planning Authority promote the co-location of larger</p>	<p>0250 0245</p>	<p>Manager's Response It is considered that Section 3.4.13 Off-License and Part Off Licence and policies S16, S17, S18, S19, S20, S21, S22, and S23 shall apply when considering planning applications for off-licence premises or extensions to existing off-licence premises.</p> <p>Manager's Recommendation No change recommended.</p>

<p>convenience foodstores and petrol filling stations, as recognised in the Retail Planning Guidelines.</p> <p>Section 3.4.3.v No information has been provided indicating the assessment criteria to be 'considered' by the planning authority. This policy may not be implementable without amendments being made to the zoning matrix.</p> <p>Policy S20 Request for a degree of flexibility for seasonal peaks such as during the Christmas period.</p>		
<p>Discount Foodstores Section 3.4.8</p>		
<p>Request that the section concerning Discount Foodstores be modified to include a statement of recognition that Retail Parks are appropriate locations for Discount Foodstores because of the synergistic effects of these types of retailing and the resultant multi-purpose trip generation achieved.</p> <p>Request that the benefits of Discount Foodstores to competition in the convenience retail sector and the consequential benefits that accrue to the consumer be acknowledged in the Development Plan.</p> <p>Policies should not seek to promote discount foodstores only and should in fact show preference to convenience foodstores, particularly, as the product range associated with same facilitates the 'weekly shop'.</p> <p>Request that enough land is zoned in the County for Discount Foodstores</p>	<p>0140 0250</p>	<p>Manager's Response</p> <p>Section 3.4.7 of the Draft Plan states that it is the policy of the Council to ensure that continuing and or change of use in retail warehouse units in areas outside town centre zoning remain within the definition of 'retail warehouse' Section 4.46 of the Retail Strategy for the GDA states that continuing to allow mix of uses into retail parks is likely to result in a negative impact on adjoining town centres as the large size units readily available in retail parks are easily accessible by car, but not public transport and divert trade away from the town core. As a result it is not considered that a retail park is an appropriate location for a discount foodstore.</p> <p>The Development Plan is not the appropriate document to outline the benefits of one kind of foodstore or another. The Draft Plan does not contain policies to support discount foodstores only. Section 3.4.6 of the Draft Plan sets out the Scale and Location of Retail Development, and section 3.4.8 sets out the details required where a discount store is proposed.</p> <p>There is sufficient district and local centre zoning in the Council to accommodate discount foodstores, however the normal conditions and parameters will have to be applied to any application for a discount foodstore.</p> <p>Manager's Recommendations</p>

		No change recommended.
Advertising Section 3.4.19		
Request more signage directing people to industrial estates. Consideration should be given to amending Policy S39 to include "where they act as a barrier to views to landmarks".	0288 0254	Manager's Response Section 3.4.20.xi Policy S49 Signage within Industrial and Employment areas and Policy 3.4.20.xii Policy S50 Signage on New buildings within Industrial and Employment Areas deals specifically with signage on elevations of buildings. Manager's Recommendation No change recommended.

6.6 A Protected Place

Archaeological and Architectural Heritage Landscape, Natural Heritage and Amenities

6.6.1 Archaeological and Architectural Heritage

Issue	Sub No	Manager's Response and Recommendations
cArchaeological Heritage		
DEHLG/ICF Archaeological Code of Practice should be noted in Section 4.2.3.	0100	<p>Manager's Response The Code of Practice agreed between the Irish Concrete Federation and the Minister for the Environment, Heritage and Local Government, 2009 - provides a framework within existing legislation, policy and practice to enable the members of the ICF to progress with its programme of work within the framework of the Government's development strategy, whilst carrying out appropriate archaeological mitigation- The archaeological heritage of the County is protected by the National Monuments (Amendment) Act 1994 under which this Code of Practice is provided.</p> <p>Manager's Recommendation No change recommended</p>
.2.4 Architectural Heritage		
Suggest the addition of a policy whereby the Council commits itself to bringing the full rigour of the law against any property owner who allows a protected structure to fall into a neglected state or fails to protect it so that it is vandalised.	0158	<p>Manager's Response It is considered that the Draft Plan adequately recognises and imposes all measures set out under Part IV of the Planning and Development Acts 2000-2009 in relation to the endangerment of Protected Structures and the procedures which are required to be followed under this Act</p> <p>Manager's Recommendation No change recommended.</p>
4.2.5 Strategy		
Suggest the following addition to paragraph 4.2.5- "Consideration shall be given to the protection of good buildings or groups of buildings of the late	0157 0196	<p>Manager's Response While a number of 19th and 20th century structures within the County are already protected it is considered appropriate to acknowledge the willingness of the Council</p>

<p>19th century or later, including modern structure of exceptional quality.”</p> <p>Wherever the words “where appropriate” are used in relation to the protection and retention of built or natural heritage they should be replaced with the words “as a matter of priority”.</p>	<p>0158</p>	<p>to consider more modern structures of exceptional quality in the county for protection. The use of the term “where appropriate” is used in relation to the objective to encourage the rehabilitation, renovation and re-use of existing older buildings as well as in Policy which relates to the retention of older buildings and it is considered appropriate to indicate that this will be encouraged in cases where it is deemed appropriate in the interest of clarity.</p> <p>Manager’s Recommendation Insert a new statement in section 4.2.5 Strategy</p> <ul style="list-style-type: none"> Continue to examine and reassess the architecture of the County with a particular focus on the protection of more modern structures of exceptional quality. <p>No other changes recommended.</p>
<p>4.2.7.i Policy AA1 Archaeological Heritage</p>		
<p>Policy AA1 – Archaeological Heritage Request that point b) be amended to incorporate access routes as public rights of way.</p>	<p>0018</p>	<p>Manager’s Response It is considered that this policy adequately addresses the issue of public rights of way having regard to the significant legal complexities surrounding the issue.</p> <p>Manager’s Recommendation No change recommended.</p>
<p>4.2.7.ii Policy AA2 Historical and Archaeological Sites and Features</p>		
<p>Request that a preservation order be put on the mass/community centre; that a survey of all historical and archaeological sites in the Brittas area be carried out and preserved and that the Council construct a ‘bretasche’ in the grounds of the community centre.</p>	<p>0071</p>	<p>Manager’s Response While it is acknowledged that it is believed that such a Bretesche would have been used in the 10th Century in Brittas- it is considered inappropriate conservation practise to falsify a historical monument in this manner. The Heritage Service sets out under the Record of Monuments and Places all sites and features of interest in the County and these are recorded in Schedule 1 of the Draft Plan and Schedule 2 of the Draft plan sets out the Record of Protected Structures which includes structures recommended following a comprehensive survey of the County carried out under the National Inventory of Architectural Heritage in 2002. This record was reviewed as part of the Draft Plan process. The Draft Heritage Plan proposes to initiate a survey of all protected sites and monuments in the County and a Buildings at Risk Audit</p>

		<p>under which buildings in this area could be included.</p> <p>Manager's Recommendation No change recommended.</p>
<p>4.2.8 Conservation of Buildings Structures and Sites</p>		
<p>Shackleton's Mill and Weir and the Guinness Bridge should be jointly managed by Fingal and South Dublin – formal arrangements to be entered into with Fingal Co Co to renovate these and maintain.</p> <p>The strategies and policies for the conservation of archaeological and architectural heritage are sound.</p> <p>An Endangerment Audit of all Protected Structures should be immediately undertaken as a priority in this Development Plan.</p> <p>Request SLO for the rehabilitation and reuse of Esker House by a relaxation of the authority's Development Management requirements</p> <p>OPW responsible for Monuments in State Care- Tully's Castle and the Round Tower, Church and Cross, Clondalkin- Recommend these monuments be specifically listed in the Plan and any development proposals be referred to OPW for consideration.</p> <p>Plan should include commitments to protect</p>	<p>0105 0137 0138 0144 0157 0196 0258 0037 0095 0154</p>	<p>Manager's Response</p> <p>The Manger welcomes the comments received from the OPW. With regard to the Monuments in State Care as listed these structures are Protected and included under Schedule 2 Record of Protected Structures, and are noted also as Recorded Monuments as follows;</p> <p>Ref 147; Tully's Castle, Clondalkin- Stone Castle (Ruin) (RM) Ref 138; Tower road, Clondalkin- Stone Round tower, Church& Cross (RM)</p> <p>All development proposals on/within or which would potentially impact on these structures will be referred to the OPW along with the Prescribed Bodies as set out under the Planning and Development Regulations 2001.</p> <p>Under the County Development Plan 2004-2010 Section 8.3.3.iii provides for the identification of Archaeological landscapes- areas that contain clusters of recorded Monuments, or areas that contain very important sites which allows for the protection of the setting and environs of recorded Monuments. This will be reinstated in the Draft Plan.</p> <p>Shackleton's Mill is in the ownership of Fingal County Council and is not within the administrative area of South Dublin County Council. The Guinness Bridge is partly within the ownership of Fingal County Council and South Dublin County Council; however, there are no plans to carry out any works to this structure at present. If any works were to be carried out a joint agreement would be necessary. It is noted that repair works are required and contact will be made with Fingal County Council to discuss when and if the appropriate finance would become available.</p> <p>It is considered that the Draft Plan has sufficient policies and objectives to guide the redevelopment or reuse of Protected Structures, particularly Policies AA7:</p>

<p>associated qualities of Monuments in State Care such as views and prospects and ensure sympathetic development adjoining the sites.</p> <p>OPW will continue to work with SDCC to improve the setting of Rathfarnham Castle and improve the amenity and cultural value of the Castle.</p> <p>St Enda's Park and Pearse Museum- Hope to build on the good working relationship with SDCC and continue the successful programme of temporary exhibitions, children's workshops, concerts, lectures, nature study events and horticultural demonstrations.</p> <p>The removal and destruction of key vernacular buildings, notably The Glebe by means of fire, allowing building to fall into disrepair should be arrested.</p>		<p>Conservation of Buildings, Structures and Sites, AA10: Retention of Older Buildings and AA11: Development Proposals involving Protected Structures. There are over 500 Protected Structures in the County and it is not considered appropriate to provide Specific Objectives for individual structures or to relax the current policies or objectives for the redevelopment of any of these structures.</p> <p>There are over 500 Protected Structures listed in Schedule 2, Record of protected Structures. These structures were each visited and photographed in the process of reviewing the County Development Plan 2004-2010. Where issues of endangerment arise the relevant endangerment procedures are followed and all actions provided for under Part IV of the Planning and Development Acts 2000-2009 are pursued. The Draft Heritage Plan includes a proposal to initiate a survey of all protected sites and structures in the County and Buildings at Risk Audit.</p> <p>Manager's Recommendation Under Policy AA6: Areas of Archaeological Potential- following on from the listed areas of Archaeological Potential in the County the following paragraph will be inserted;</p> <p>Where it is appropriate, the Council, in conjunction with the Heritage and planning Division of the Department of Environment, Heritage and Local Government, will identify and designate as 'Archaeological Landscapes' areas that contain clusters of Recorded Monuments, or areas that contain very important sites. This will allow for the protection of the setting and environs of Recorded Monuments.</p>
<p>4.2.9.ii Policy AA8 Architectural Conservation Areas</p>		
<p>Policy AA8 In accordance with Policy AA8, request that the western side of Newcastle village be designated as an Architectural Conservation Area as it contains many significant buildings.</p> <p>Request that special attention be paid to the range and type of architectural and cultural heritage in</p>	<p>0107 0154 0158</p>	<p>Manager's Response Policy AA8: Architectural Conservation Areas sets out the objective to examine the need to designate further areas as Architectural Conservation Areas during the period of the plan and these areas will be taken into consideration. The Dublin Civic trust carried out assessments in a number of areas across the County in order to designate the current ACAs and it is on foot of the recommendations that the boundaries of the current ACA's were established.</p>

<p>Rathcoole by designating it as a Architectural Conservation Area</p> <p>Tallaght Architectural Conservation Area should include the two cottages located on the old Greenhills Road.</p> <p>Propose that the extensive range of mill structures and related features in the town lands of Corkagh, Corkagh Demesne and Fairview be designated as an 'Architectural Conservation Area'.</p>		<p>Manager's Recommendation No change recommended.</p>
<p>4.2.9.v Policy AA11 Development Proposals involving Protected Structures</p>		
<p>Recommend, after Par 4.2.9.v the following: "In the case of protected buildings that are in poor condition, requiring expensive restoration, favourable consideration shall be given to applications for sensitively designed conversions/extensions of the protected building or appropriate development within its curtilage, so that the benefit gained from the development can contribute towards the cost of restoration, where the alternative outcome could be the building's decline and eventual dereliction.</p> <p>It is recognised that modern standards of energy conservation cannot be applied retrospectively, and that relative inefficiency in energy performance shall not be used as a reason to justify intervention of a nature or degree seriously compromising the integrity of the heritage structure, or its demolition.</p>	<p>0157 0196</p>	<p>Manager's Response Policy AA7: Conservation of Buildings, Structures and Sites sets out that the Council will carefully consider and scrutinise proposals for development within the curtilage of a Protected Structure in order to assess the impact that development may have on the contribution the curtilage makes to the character of the structure and this policy applies to all structures and development proposals equally. Policy AA11: Development Proposals involving Protected Structures sets out the general intentions of the Council in assessing proposals and all aspects of a proposed development of a Protected Structure and it is the intention of the Council to ensure the protection of the integrity and heritage of all structures included in the Record.</p> <p>Manager's Recommendation No change recommended.</p>

6.6.2 Landscape, Natural Heritage and Amenities

Issue	Sub No	Manager's Response and Recommendations
Views and Prospects Section 4.3.5.ii		
<p>Include four new Prospects for which it is an objective to protect. This is the view from the N4 across the Liffey Valley and through the Valley and as these are exceptional vistas New views: N4(Between M50 roundabout and Woodies Junction)- Liffey valley Lucan Rd (Between Woodies Junction and through Lucan Village, via Lucan Road, The Old Hill, Main Street, Lucan Road, to N4 underpass)- Liffey Valley N4 (Between Woodies Junction and County Boundary with Kildare)- Liffey Valley Hermitage Golf Club- View through and across the Liffey Valley looking east from the Clubhouse, as far as the spire and the pigeon house.</p> <p>Suggested additions to Views and Prospects: 1/ Cul-de-sac off North side of R114 on the West side of Belgard Deer Park starting at the "Famine Cross" and leading up to Knockanvinidee Hill (both sides full length). 2/ North to South minor road from Ballymaice to R114, East of Belgard Deer Park (East Side only). 3/ Road from South side of R114 starting at "Famine Cross" and leading to the East of Black Hill and to Ballinascorney Upper and beyond to the County Boundary (both sides). 4/ All the roads between "St. Anne's" on the East side of the Upper Bohernabreena Reservoir leading South to Castlekelly Bridge (adjoining Cunard) and</p>	<p>0105 0137 0138 0157 0196 0071 0154 0158 0254</p>	<p>Manager's Response Section 4.3.4 Landscape and Policies LHA1 and LHA2 of the Draft plan set out the Councils responsibility and commitment to the management and enhancement of the Landscape including protected Views and Prospects. The suggested Views and Prospects in the Lucan Area</p> <p>Policies LHA1 (4.3.5.i) Preservation of Landscape Character, LHA2 (4.3.5.ii) Views and Prospects, LHA10 (4.3.7.viii) Dublin Mountains Area above 350 metre contour, LHA 12 (4.3.7.x) Outdoor Recreational Potential of the Mountain Area, LHA13 (4.3.7.xi) Development within mountain areas or high amenity areas, LHA14 (4.3.7.xii) Development below the 120m contour in the Dublin Mountains Area, LHA16 (4.3.7.xiv) Forestry, LHA18 (4.3.7.xvi) Hedgerows, LHA19 (4.3.7.xvii) Flora and Fauna, LHA20 (4.3.7.xviii) River and Stream Management, LHA21 (4.3.7.xix) Watercourses, LHA30 (4.3.9.vii) Green Structure, and LHA31 (4.3.9.viii) Greenbelts, LHA32 (4.3.9.ix) Tree Planting and Landscape Enhancement, SN2 (1.4.8.i) Design Statement, and SN3 (1.4.8.ii) Existing Site Features deal with these issues. These policies place strong emphasis on the protection of landscape features, and the identification, assessment and retention of such features in areas which are subject of development proposals.</p> <p>No changes have been made to the list of Views and Prospects that has been carried over from the 2004-2010 Plan. It is considered unnecessary to add additional Views and Prospects to the Draft Plan.</p> <p>The requirement for Landscape Impact Assessment is specifically included in LHA14 (4.3.7.xii) Development below the 120m contour in the Dublin Mountain Area and EC3 (2.5.7.i) Telecommunication Infrastructure in Sensitive Landscapes.</p> <p>Policy LHA1 (4.3.5.i) Preservation of Landscape Character, relates to the</p>

<p>beyond (both sides). 5/ Tibbradden Road – Map 5B – (both sides).</p> <p>Suggested Prospects; Killakee Road from Killakee Cottage to Cruagh Road Junction Killakee Rd/Military Rd to County Boundary (Featherbed Road Cruagh Rd from Alpine Lodge to Ballybrack Rd Junction Cruagh Rd from Killakee Rd to Ballybrack Junction Tibbradden Road.</p> <p>Believes that 'protected views' will be an obstacle to development in the Brittas area.</p> <p>Request the inclusion of Windmill Hill, Lyons Hill in table 4.3.1 Prospects for which it is an objective to protect. Viewing point is the Naas Rd (Brown's Barn area to include the prospect of Windmill Hill.)</p> <p>Suggest inclusion in Table 4.3.1 of the viewing point from former outbuildings of Corkagh House/Parks Depot/Rose Garden towards the Naas Road and the Dublin Mountains.</p> <p>The Plan should promote the protection of designated scenic landscapes, scenic views, scenic routes and landscape features of regional, county and local value. The Plan should also take into account the landscape character and landscape features and designations adjoining the Plan area.</p> <p>The Plan should promote the recognition of visual linkages between established landmarks and landscape features and views which should be taken into account when land is being zoned and when individual development proposals are being</p>		<p>preservation of Landscape Character, and notes the objective of the Council to further develop the Landscape Character Areas Assessment.</p> <p>Manager's Recommendations No change recommended.</p>
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<p>assessed / considered within the Plan area</p> <p>Consideration should also be given to promoting the requirement for an appropriate "Visual Impact Assessment" for proposed development with potential to impact adversely on significant landscape features within the Plan area. Consideration should also be given to the promotion of the designation, and use of, agreed and appropriate viewing points for these assessments.</p> <p>Consideration should be given to the inclusion of a Policy to review existing Landscape Character Areas for South Dublin, and identify vulnerability and adequate protection of landscapes and visual corridors.</p>		
<p>Natural Heritage Section 4.3.6</p>		
<p>When considering the provision of facilities in the Liffey Valley or Slade of Saggart, care should be taken to ensure that such amenities do not detract from the scientific interest of the sites.</p> <p>Request Policy LHA22 Dublin Mountain Zones, as detailed in section 4.3.9.i, '...to conserve the character of the Dublin Mountain and high amenity zones' be extended to afford protection of Windmill Hill.</p> <p>Policy LHA10 Delete 'Will Seek'.</p> <p>Seeks the expansion of Policy LHA23 – Geological Features.</p>	<p>0164 0154 0018 0283 0139 0254</p>	<p>Manager's Response.</p> <p>It is agreed to recheck the boundaries of the SAC and pNHA, notwithstanding that the Council is confident that the mapping of SACs and pNHA areas are correct. There are draft Conservation Plans in the course of preparation by the NPWS at present for the SACs. There are no Management Plans available for pNHAs.</p> <p>The development of a heritage park located at Firhouse Weir is part of Section 4.3.9.v Policy LHA28 Dodder Valley Linear Park. The policy refers to the 'development of a heritage park located at Firhouse Weir, incorporating the historic weir, sluices, city watercourse and surrounding lands' It is not considered necessary to alter the description or location of the heritage park.</p> <p>Heritage Committees are not considered a matter for the Development Plan. Policy LHA 23 Geological Features is considered sufficient and not in need of expansion.</p> <p>It is considered that the policies and objectives contained in the Draft Plan relating to</p>

<p>LHA27 Request that the following phrase be added "promote the extension of the Park to adjoining mountain areas.</p> <p>The boundaries of the SAC and pNHA areas should be checked with the NPWS prior to finalising the plan as boundaries can change from time to time.</p> <p>More local representation on the heritage committees and working groups need to be progressed. Individuals with local knowledge need to be included, to broaden the perspective and inform the plan.</p> <p>The " heritage park" identified for the Firhouse Weir area should be extended to the old Bawn Weir, and includes the tourism amenity based on the historical mills which were a feature along the Dodder.</p> <p>The Plan should include a specific Policy/Objective to take into account the objectives and management practices proposed in available Management Plans for designated natural heritage sites.</p>		<p>the Dublin Mountains afford sufficient protection to its natural character and amenity, where it is achievable in terms of the Councils remit.</p> <p>Manager's Recommendation Recheck boundaries of SAC's and pNHA's.</p>
<p>Liffey Valley Section 4.3.7</p>		
<p>An endorsement of the Towards A Liffey Valley Park report and stated objective to support its implementation would be welcome.</p> <p>Policies LHA3-7 The following should be added to each policy: "within two years of the adoption of the</p>	<p>0095 0018 0105 0144 0105 0137</p>	<p>Manager's Response The Draft County Development Plan has in place a series of policies (LHA 3- 7) and objectives to protect and enhance the amenity that is the Liffey Valley. The Liffey valley SAAO enjoys maximum protection under the Planning Acts. The Development Pan sets out policies and objectives for the County as a whole. Zoning objectives relate to a range of areas throughout the County and reflect the</p>

<p>development plan.”</p> <p>Insert paragraph in the CDP specifying that there will be a presumption for no development on lands at the Liffey Valley and that applications will only be considered in exceptional circumstances</p> <p>Council should take action to support the extension of the Liffey Valley SAAO, engage proactively with the 3 Councils bordering the valley in ensuring the Valley is protected across County Boundaries</p> <p>Request for no further crossings of the Liffey for the extent of the County Boundary.</p> <p>The Liffey Valley should be afforded the same protection as the Dublin Mountains</p> <p>The Liffey Valley SAAO should be expanded to protect the lands at St Edmundsbury/Woodville</p> <p>We submit that all lands in the Liffey Valley (i.e all lands between the River Liffey and the Palmerstown Rd, N4, Lucan Rd and N4, to the Border with Kildare) should be defined as the Liffey Valley and given a zoning similar to the Dublin Mountains zoning, with similar protection.</p> <p>Submit that there should be a paragraph in the CDP specifying that there will be a presumption for no development on the Liffey Valley Lands and that applications will only be considered in exceptional circumstances. e.g. the expansion of schools, or other necessary educational or institutional</p>	<p>0138 0117 0154 0281</p>	<p>policies and objectives contained elsewhere in the plan. With respect to the High Amenity zoning, this affords the highest protection of any of the zoning categories and reflects the policies and objectives of the Development Plan with respect to maintaining sensitive environmental areas. With respect to the 'Mountain zoning' there are no other uplands in this County other than the Dublin Mountains and the particular zoning reflects this. It is not considered appropriate for a particular zoning objective to refer to a particular river valley when the similar zoning objectives affect other areas of the County, in particular the Dodder valley.</p> <p>It is the policy of the Council to carry out all tasks and actions as outlined in the plan. However the completion of these actions is subject to the resources of the Planning Department during the lifetime of the Plan, and as such a commitment of two years from adoption is not feasible.</p> <p>Manager's Recommendations No change recommended.</p>
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<p>development.</p> <p>Submit that in the context of South Dublin, the SAAO should be extended to cover the Liffey Valley area.</p> <p>Submit that the SAAO should be extended to cover the Liffey Valley area as described in the section on zoning.</p> <p>The Liffey Valley Park be deemed a National Park</p>		
<p>River and watercourses Section 4.3.7.xviii and 4.3.7 xix</p>		
<p>The Griffeen River should be subject to environmental designation and an assessment carried out under Article 6 of the Habitats Directive 92/43/EEC.</p> <p>The pNHA of the Grand Canal should be protected as an amenity for biodiversity first and foremost over and above any other objective.</p> <p>The Bohernabreena Reservoir and the Rivers Dodder and Liffey are exceptional in the area with regards to supporting Atlantic salmon and therefore should be protected and the Plan should make clear that salmonid waters constraints apply to any development in this area.</p> <p>An undisturbed buffer zone between development area and river bank should be maximised.</p> <p>Policy LHA21 – Watercourses Request that the</p>	<p>0063 0107 0105 0164 0257 0018 0158 0283 0254</p>	<p>Manager's Response</p> <p>The Council is committed to preserving all the waterways in the County including its habitats. It is considered that the buffer zone of 10m is sufficient and in line with environmental requirements.</p> <p>Policy LHA 21: (4.3.7.xix) Watercourses indicates that the promotion of access, walkways and other recreational uses on public space open space alongside watercourses will be subject to defined strategies of nature conservation. Policy LHA 22: (4.3.7.xx) Protection of the Grand Canal indicates that it is policy to enhance the visual, recreational, environmental and amenity value of the Grand Canal, and furthermore states that all developments adjoining the Grand Canal should be accompanied by a Biodiversity Action Plan. Both the Liffey and Slade Valleys are pNHAs. Policy LHA8 (4.3.7.vi), Special Areas of Conservation and proposed Natural Heritage Areas, notes that it is policy to protect and preserve these area, while also noting that such places may be damaged by recreational overuse. It is considered that any amenity development in either Slade or Liffey Valleys would be required to be in compliance with relevant policies on the protection of pNHAs.</p> <p>LHA20 river and Stream Management and LHA21 Watercourses indicate that it is an objective of the Council to limit development in Flood Plains and to preserve riparian</p>

<p>following policies be included: • Land adjacent to river banks and lakes will be reserved for public access and the council will create linear parks to facilitate walking/cycling routes. • In partnership with the national Park and Wildlife Service, Waterways Ireland and other relevant stakeholders to facilitate public access to and understanding of waterway corridors and wetlands where feasible and appropriate. • Require pedestrian routes along rivers with increased public access. • Rivers should have recreational potential.</p> <p>Suggests that the 10m buffer is very tight, especially given recent flooding experiences in various parts of the country, and suggest that it should be 15m.</p> <p>Care should be taken to ensure that the provision of amenities such as footpaths to give access to waterways or are located in pNHAs do not result in adverse impacts on protected flora, fauna or habitats or detract from the scientific interest of designated sites.</p> <p>The Plan should provide for the protection, management, and as appropriate, enhancement of existing wetland habitats where flood protection/management measures are necessary.</p> <p>The Fisheries Board requests the designation of lands adjacent to surface waters, particularly salmonid systems as areas of open preservation.</p>		<p>corridors. Development proposals in river corridors would only be considered where they preserve biodiversity, maintain a minimum of 10m to either side of the river bank and maintain the character and appearance of the riverbank. Land filling, culverting, diversion or re-aligning of river or stream corridors will not be permitted.</p> <p>Section 3.2.21 of the Draft Plan deals with flooding, and indicates within Policy WD13 Risk of Flooding, the Councils intention to fulfil its responsibilities under the Flood Risk directive 2007/60/EC and to implement the recommendations of the Guidelines on the Planning Systems and Flood Risk Management (2008) including using the Guidelines to assess applications for planning permission.</p> <p>Manager's Recommendations Amend 4.3.7.xviii Policy LHA20 first bullet point to read "Dedicate a minimum of 10m each side of the waters edge for amenity, biodiversity and walkway purposes where practical; this may be increased depending on the size of the watercourse and any particular circumstances.</p>
<p>Biodiversity 4.3.7.xvii- 4.3.7xix</p>		
<p>Consideration should also be given to the necessity</p>	<p>0254</p>	<p>Manager's Response</p>

<p>for habitat mapping to better implement LHA19.</p> <p>Consideration should be given to the inclusion of a Policy/Objective for a phased and co-ordinated programme of Habitat Mapping (including wetlands) of the Plan area. This mapping should assist in identification of potentially significant sensitive ecological sites.</p> <p>Consideration should be given to including a new Policy (or amending Policy LHA9) to more clearly state the requirement for Appropriate Assessment screening of all proposed amendments to the adopted Plan and any projects, which may arise subsequent to adoption of the Plan.</p> <p>Recommend that no development be permitted higher than the 300m contour to afford appropriate protection to the County's Natura 2000 sites.</p> <p>4.3.7.vi it is recommended that mention be made in the plan of flora and fauna species which are protected under National Law wherever they occur and not just in designated sites or wildlife corridors.</p> <p>Under section 2.3.1.2 of the Appropriate Assessment Screening, the Department welcomes the intention to protect feeding areas of greylag geese that roost on the Poulaphouca Reservoir SPA by subjecting proposed developments in this area to impact assessment. However, there does not appear to be any cross-reference to this in section 3 of the Plan.</p> <p>Need to provide biodiversity corridors and areas where priority consideration is afforded to wildlife</p>	<p>0255 0283 0105 0144 0100 0164 0154 0157 0159 0218 0257 0196 0254 0105 0137 0138</p>	<p>The Council is committed to protecting and preserving the County's biodiversity. The conservation of existing flora and fauna is a central element in the preservation of the natural heritage of the County and important to the achievement of sustainability.</p> <p>Section 4.3.7.xvii of the draft plan states that "in conjunction with other agencies, the Council will endeavour to prevent the loss of woodlands, hedgerows, aquatic habitats and wetlands wherever possible. In addition, the Council will explore the potential for habitat protection, enhancement and recreation in urban areas. The Council will seek to preserve habitat corridors from fragmentation by infrastructure development and where it is unavoidable will identify how alternative connections can be created to maintain these. The Council will help ensure that any E.U. protected species are not placed under further risk of reduction in population size." It is considered that this section adequately addresses the issues raised.</p> <p>The manager accepts that there is no direct cross-reference with the intention in the Appropriate Assessment to protect feeding areas of greylag geese that roost on the Poulaphouca Reservoir SPA with section 3 of the Plan.</p> <p>Policy LHA19 (4.3.7.xvii) Flora and Fauna notes that it is Council policy to protect natural resources within the County and to conserve the existing wide range of flora and fauna in the County through the protection of wildlife habitats and corridors wherever possible. Additionally, it is proposed to strengthen this policy through noting the need to protect nationally protected species.</p> <p>Section 2.3.21 of the Draft Plan deals with flooding, and indicates within Policy WD13 (2.3.22.i) Risk of Flooding, the Councils intention to fulfil its responsibilities under the Flood Risk Directive 2007/60/EC and to implement the recommendations of the Guidelines on the Planning Systems and Flood Risk Management (2008) including using the Guidelines to assess applications for planning permission.</p> <p>Policies, LHA15 (4.3.7.viii) Heritage and Biodiversity Plan, LHA17, (4.3.7.xv) Trees and Woodlands, LHA18 (4.3.7.xvi) Hedgerows, LHA19 (4.3.7.xvii) Flora and Fauna, LHA20 (4.3.7.xviii) River and Stream Management, LHA21 (4.3.7.xix) Watercourses, LHA30 (4.3.9.vii) Green Structure, and LHA31 (4.3.9.viii) Greenbelts, allow for the retention of existing habitats and biodiversity corridors and take into account many of the issues raised in '<i>Major Pressures on Habitats and Species</i>'</p>
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<p>NPWS Guidance on Biodiversity should be noted in Section 4.3 of the Draft Plan.</p> <p>There appears to be no mention of species protected under National Law, apart from protecting their habitats and wildlife corridors where possible (Policy LAH19). It is important to note that such species are protected wherever they occur and not just in designated sites or wildlife corridors. It is recommended that mention be made of protected flora and fauna under National as well as EU law.</p> <p>Bat species are protected under both National and EU law and the policy relating to lighting of key buildings and the Liffey Bridge within the Plan for Lucan has the potential to impact adversely on bat species where they are present.</p> <p>The plan should recognise the extraordinary pressure our biodiversity has experienced in the context of the rapid development of the Greater Dublin Area and vast tracts of South Dublin County</p> <p>Recommend the following addition: 4.3.9 xiv Wildlife corridors shall be preserved wherever possible.</p> <p>Recommend the following addition:4.3.9.xv In public parks and open spaces there shall be a policy to establish “wild spaces”, a provision for encouraging biodiversity and natural wildness</p> <p>See the loss of our greenbelts as a detriment to our wildlife and open spaces</p>		<p>The ‘Main Objectives Over the Coming Five Years and Beyond’ as set out in the Conclusions of the National Parks and Wildlife Service Report have been incorporated in the Plan through the range of policies as outlined above.</p> <p>Policy H33 (1.2.52.v) Bohernabreena/ Glenasmole Area, requires buffer zones to be provided around the SAC in Glenasmole. In other instances site analysis and the retention of existing site features as required in policies SN2 (1.4.8.i) Design Statement, SN3 (1.4.8.ii) Existing Site Features and H38 (1.2.52.x) Dwellings in Rural Areas. The GIS based environmental assessment and monitoring system envisaged for the Plan also includes the use of buffer zones.</p> <p>Protection of non-designated species, flora and fauna is provided for under policies, LHA15 (4.3.7.viii) Heritage and Biodiversity Plan, LHA17, (4.3.7.xv) Trees and Woodlands, LHA18 (4.3.7.xvi) Hedgerows, LHA19 (4.3.7.xvii) Flora and Fauna, LHA20 (4.3.7.xviii) River and Stream Management, LHA21 (4.3.7.xix) Watercourses, LHA30 (4.3.9.vii) Green Structure, and LHA31 (4.3.9.viii) Greenbelts, H38 (1.2.52.x) Dwellings in Rural Areas, SCR39 (1.3.32.vii) Open Space Network SCR40 (1.3.32.viii) Green Routes Network, SN2 (1.4.8.i) Design Statement, and SN3 (1.4.8.ii) Existing Site Features</p> <p>Policies LHA15 (4.3.7.viii) Heritage and Biodiversity Plan, SN2 (1.4.8.i) Design Statement, and SN3 (1.4.8.ii) Existing Site Features all allow for the identification and retention of urban biodiversity.</p> <p>Policies LHA8 (4.3.7.vi) Special Areas of Conservation and proposed Natural Heritage Areas, LHA9 (4.3.7.vii) Impacts on Natura 2000 and LHA19 (4.3.7.xvii) Flora and Fauna, deal with the protection of protected habitats and species.</p> <p>Policy LHA15 Habitat surveys will be undertaken as actions of the current Draft Heritage Plan. A Biodiversity Plan where further habitat and species surveys will be proposed is also an action of the Heritage Plan.</p> <p>It is recommended that the explanatory text appended to Policy LHA9 (4.3.7.vii) Impacts on Natura 2000 sites, is amended to clearly state the need for Appropriate Assessment of <i>proposed amendments</i> to the adopted Plan.</p>
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<p>Suggests that the Council recognises that increasing biodiversity in the vicinity of airports may not be achievable due to the threat posed to aircraft by bird activity.</p> <p>Request that best management practice should be implemented at all times in relation to any activities that may impact on riverine or riparian habitats.</p> <p>The policy relating to lighting of key buildings and the Liffey Bridge has the potential to impact adversely on protected bats, which are protected under both National and EU law.</p> <p>Consider inclusion of a Policy/Objective to manage and mitigate against invasive species / noxious weeds as relevant to South Dublin.</p> <p>The Plan should consider amending Policy LHA19 to include the protection of species at risk, as appropriate.</p> <p>The Plan should promote the provision/application of appropriate buffer zones between designated ecological sites and areas zoned for development.</p> <p>The Plan should promote the setting up of procedures to ensure compliance with the requirement of Article 6 of the Habitats Directive</p> <p>The Plan should also refer to the protection of Annex I- Habitats and Annex II -Animal and Plant species of "Council Directive 92/43/EEC on the conservation of natural habitats and wild fauna and flora".</p>		<p>The Draft Plan includes provision for the screening of Natura 2000 sites (4.3.7.vii, final paragraph) The reference to any proposed amendments/variations to the Plan is acknowledged.</p> <p>Manager's Recommendations Insert in the explanatory text for Policy LHA19 Flora and Fauna:- 'In conjunction with the National Parks and Wildlife Service, the Council will require impact assessment of proposed development in Brittas and Aghfarrell on the feeding areas of protected Greylag Geese'</p> <p>'The Council will help ensure that any E.U and Nationally protected species are not place under further risk of reduction in population size.'</p> <p>To be inserted after 'In conjunction with other agencies, the Council will endeavour to prevent the loss of woodlands, hedgerows, aquatic habitats and wetlands wherever possible, " including requiring a programme to monitor and restrict the spread of invasive species such as those located along the River Dodder".</p> <p>Add to Section 4.3.7 vii: The Council will fulfil the requirements of the National Parks and Wildlife Service <i>Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities (December 2009)</i> for projects and plans.</p> <p>Insert in SLO7 The design of any proposed future <i>lighting</i> of the Liffey Bridge shall be subject to assessment of the impact of lighting on bat roosting, hunting and movements.'</p> <p>Insert in Policy LHA9 Replace 'arising from this Plan will' within the explanatory text beneath LHA9 with 'arising from this plan and proposed amendments to the adopted Plan will'</p> <p>Replace 'Where relevant, projects will be screened', with 'Projects noted within the National Parks and Wildlife Service <i>Appropriate Assessment of Plans and Projects in</i></p>
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<p>Protection should be afforded to key hedgerows, and a policy of maintaining hedgerows and their natural diversity should be specified.</p> <p>Sufficient treatment capacity should be available both within the receiving sewerage system locally and downstream at the relevant Waste Water Treatment Plant to ensure ecological integrity.</p> <p>The Plan should also take into account and implement in association with the National Parks and Wildlife Service, the <i>Main Objectives Over The Coming Five Years and Beyond</i>.(NPWS, 2008).</p> <p>The Plan should promote the protection non-designated habitats, species and local biodiversity features including rivers, wetlands, hedgerows, individual trees, streams, grassland etc.</p> <p>Recognise and increase the awareness and protection of "Urban Biodiversity".</p>		<p><i>Ireland-Guidance for Planning Authorities</i> (December 2009) document will be screened.</p> <p>Insert in Policy LHA15 replace following text within LHA15 (4.3.7.xiii) Heritage and Biodiversity Plan, 'prepare a County Biodiversity Plan following public consultation' with 'prepare a County Biodiversity Plan following public consultation, and within the lifetime of the Plan'.</p> <p>Green City Guidelines. The last sentence on page 75 (part of 1.4.6.i Character Appraisal) should be amended as follows:- The site survey and analysis will show where existing landscape features exist on site including for example, existing trees, hedgerows, water bodies and interesting/protected structures. This analysis will serve to inform, at an early design stage, the location of proposed open space, parks and green corridors, where it can most benefit the retention of existing ecology as required by policy LHA18 Green City Guidelines, and integrate it into the neighbourhood.</p> <p>Furthermore it is recommended that a new policy be inserted in LHA18 which states:-</p> <p>Policy LHA18 Green City Guidelines. It is the policy of the Council to require that all Planning applications for medium and high density development utilise the 'Green City Guidelines' (UCD Urban Institute Ireland 2008) to effectively retain and incorporate biodiversity into development proposals</p>
<p>Biodiversity 4.3.7.xvii- 4.3.7xix</p>		
<p>Absence of a Biodiversity Action Plan and other Biodiversity Studies and flood assessment are major deficiency- County Plan cannot be considered in the absence of these and other matters</p>	<p>0105 0137 0138</p>	<p>Manager's Response It is acknowledged in Section 3.3.8 of the Environmental Report that a lack of Biodiversity or Habitat Plan for the county constrains assessment at local level. The Biodiversity Plan is a requirement of the Draft Plan (LHA15 Section 4.3.7.xiii). The Biodiversity Plan is also an action of the Draft County Heritage Plan and it is intended</p>

		<p>to undertake a county habitat survey during the course of 2010.</p> <p>Section 2.3.25 of the Plan notes that recommendations and outputs from the Dodder and Liffey CFRAMS process will be incorporated into the Development Management process. This will ensure that long term strategies and programmes for flood risk management will be implemented on an ongoing basis. It is recommended that attention be drawn to the CFRAMS flood extent maps and the "alluvial soils" floodplain maps by means of a SLO located alongside the potential flooding areas.</p> <p>Manager's Recommendation Insert new SLO: The areas of flooding potential as indicated in the Dodder Catchment Flood Risk Assessment Management Study (CFRAMS) and the OPW "alluvial soils" floodplain maps are to be taken into account along with the requirements of Section 5 of The Planning System and Flood Risk Management Guidelines (November 2009) when assessing planning applications, with a view to restricting or, if necessary, refusing development proposals within such areas in order to avoid flooding events.</p>
<p>Trees and woodlands Section 4.3.7.xv</p>		
<p>Practices to remove older and unsound trees serve to negate the important function they provide as habitats and food sources, and demonstrate an inappropriate perception of the balance of interests that need to be served in an environment which has been for too long exploited for the interests of developers and levies.</p> <p>Recommend the following addition: 4.3.9. xvi. The Council intends to commission a survey of trees in the county, with a view to identifying trees, woodlands, or copses of exceptional interest, and to give them protection, and also to identify locations appropriate for new planting in the</p>	<p>0137 0138 0157 0255 0288 0018 0158 0196</p>	<p>Manager's Response. Policy LHA32 Tree Planting and Landscape Enhancement states that 'it is the policy of the Council to improve areas of poor environmental quality with significant tree planting to improve and enhance the visual appearance of small neglected areas with good quality landscaping. It is not considered necessary nor achievable to attach a condition in relation to a specific amount of trees as each development proposal is not the same.</p> <p>It is also considered not necessary for the Council to acquire woodlands in the County from Coillte or others. Policy LHA33 Access to Forest and Woodland Areas state that "It is the policy of the Council to seek the co-operation of Coillte and other agencies and landowners where appropriate, in the establishment of access ways, bridle paths, nature trails and other recreational facilities within forest and woodland areas, as part of a connected network of walking and cycling routes within the</p>

<p>interest of urban landscaping.</p> <p>At Policy LHA32 and Section 1.3.34 of the Draft Development Plan amend to include policy statement as follows: 'It is the policy of the Planning Authority to seek the provision of at least 1 new tree per every 100 sqm of land area of the county'</p> <p>Request the planting of trees along the N7 especially from Kingswood through to the Red Cow interchange.</p> <p>LHA33 – Access to Forest and Woodland Areas Request an additional policy that the Council will attempt acquire Cruagh Wood, Montpelier Hill (Hellfire Club) and Massey Estate and others from Coilte.</p> <p>Welcome proposed TPO study and suggest public should be invited to submit specimens for inclusion.</p> <p>Recommend the following addition: 4.3.9. xvi. The Council intends to commission a survey of trees in the county, with a view to identifying trees, woodlands, or copses of exceptional interest, and to give them protection, and also to identify locations appropriate for new planting in the interest of urban landscaping.</p>		<p>County.”</p> <p>The concern regarding older and unsound trees is noted, however the Council is committed to protecting and enhancing the biodiversity of the County.</p> <p>Manager's Recommendations. No change recommended.</p>
<p>Amenities Section 4.3.8</p>		
<p>Policy LHA16 • Request that this policy be relocated to Theme 3 Section 2 and that after development in the 2nd paragraph 'including private forestry' be included. • The following</p>	<p>0018</p>	<p>Manager's Response It is considered that policies relating to forestry are appropriately located in Theme 4 Protected Place, given their recreation and amenity function and it is therefore not considered appropriate to relocate these in Theme 3 Section 2 Enterprise and</p>

<p>paragraph should be added: "The Council will encourage recreational activities including walking, mountain biking preferably on dedicated trails), orienteering and other non-noise generating activities." • The first line of the final paragraph should be deleted. • The following policies should be added: 'Forestry should not obstruct existing rights of way or traditional walking routes' and 'it is the policy of the Council to identify existing rights of way and traditional walking routes and established walking routes before planting commences.' • Protect access routes to upland walk and rights of way.</p> <p>LHA29 Request that other suitable activities should include scrambler bikes and quads.</p> <p>Support for Policy LHA12, LHA15, LHA22, LHA25, LHA28 and LHA36</p>		<p>Employment.</p> <p>With regard to the proposals in the submission relating to 'rights of way' and 'walking routes' it is considered that the relevant policies and objectives (LHA31: Access to Forest and Woodland Areas; LHA32 Public Rights of Way; LHA33 Trails, Hiking and Walking Routes; and LHA34: Amenity/ Viewing lay-bys) adequately address the issues arising having regard to the significant legal complexities surrounding the issue of public rights of way. It should be noted that a number of the measures proposed would require the allocation of substantial resources having regard to the legal requirements to be satisfied for the purpose of registering such easements without giving rise to costly legal challenges by affected landowners.</p> <p>It is not considered necessary to include scrambler bikes and quads in Policy LHA29.</p> <p>Manager's Recommendations No change recommended.</p>
<p>Dodder Valley Section 4.3.9.v</p>		
<p>The Dodder Valley should be developed as a high amenity area.</p> <p>Section 1.3.4 of Draft Plan refers to the Dodder Valley, the only part of the Dodder Valley that is protected is in Rathfarnham, and there is no mention of Tallaght.</p> <p>Request a detailed map showing all areas of the Dodder valley that will be zoned as high amenity and highlighting any land to be rezoned.</p> <p>Ensure no housing development near the Dodder in the area of the Old Mill.</p>	<p>0102 0208 0130</p>	<p>Manager's Response The Dodder Valley is zoned 'G' "To protect and improve high amenity areas"</p> <p>Section 4.3.9.v Policy LHA28 of the Draft Plan states it is the policy of the Council to provide for the continued development of the Dodder Valley Linear Park.</p> <p>Section 4.3.7.xi Policy LHA13 Development within High Amenity Areas or Mountain Areas states that it is the policy of the Council that within High Amenity Areas or the Dublin Mountains Area, any new development not related directly to the area's amenity potential or to its use for agriculture, mountain or hill farming will not be permitted.</p> <p>SLO 66 Oldcourt, Kiltipper Bridge states that "proposal for bridging the Dodder Valley at Oldcourt/Kiltipper shall ensure that negative biodiversity impacts are remediated,</p>

<p>Support for LHA 26 – Dodder Valley Linear Park. It is hoped that it will provide a gateway to the Dublin Mountains and facilitate a tourist centre.</p> <p>4.3.9.v LHA26 Dodder Valley linear Park- Suggest that the proposed bridge between Oldcourt and Kiltipper be an elevated design to leave the river bank for walkers etc.</p>		<p>appropriate amenity and accessibility to the river is improved and that the character of the bridge respects the Dodder Valley landscape.</p> <p>SLO 67-Oldcourt Conditions on development sets out five conditions to be applied to development at Oldcourt including access, public open spaces, development design, biodiversity and road improvements.</p> <p>It is considered that the above policies afford the necessary protection for the Dodder Valley. the zoning of which is quite stringent in order to protect its high amenity value. A detailed map of the Dodder Valley can be found as part of the Development Plan Maps.</p> <p>Manager's Recommendations No change recommended.</p>
<p>Public rights of way and access Section 4.3.9.xi</p>		
<p>Supports Policy LHA34 and requests that the right of way from Relickeen Lane, Loughtown/Brownstown to the Grand Canal be recoded and maintained by the Council.</p> <p>Policy LHA35 In penultimate paragraph insert 'Keep Ireland Open' after 'partnership'</p> <p>Proposal for amendment, by way of additional wording, to Policy LHA25 at Paragraph 4.3.9.ii – Area of Special Amenity – Bohernabreena Reservoirs (page 216) in order to state clearly that such strategy be specific in relation to access to the Upper Reservoir for disabled or mobility-impaired persons. Suggested additional wording is as follows: 'A specific objective of such a joint strategy will be to achieve access to the Upper Reservoir at the Castlekelly entrance for persons with</p>	<p>0107 0018 0195</p>	<p>Manager's Response It is not considered appropriate to add any further individual groups or parties in the penultimate paragraph of Policy LHA35.</p> <p>With regard to the proposals in the submission relating to 'rights of way' and 'walking routes' it is considered that the relevant policies and objectives (LHA31: Access to Forest and Woodland Areas; LHA32 Public Rights of Way; LHA33 Trails, Hiking and Walking Routes; and LHA34: Amenity/ Viewing lay-bys) adequately address the issues arising having regard to the significant legal complexities surrounding the issue of public rights of way. It should be noted that a number of the measures proposed would require the allocation of substantial resources having regard to the legal requirements to be satisfied for the purpose of registering such easements without giving rise to costly legal challenges by affected landowners.</p> <p>Manager's Recommendations No change recommended.</p>

<p>disability/mobility impairment'.</p> <p>Section 4.3.6 Request a policy on access to the natural heritage.</p> <p>LHA 34 Public Rights of Way Request that all except the 2nd paragraph be deleted and replaced by:</p> <ul style="list-style-type: none"> • A list of existing public rights of way within one year of adoption of plan to include maps • Protect, preserve, promote, enhance, improve and maintain, for the common good, existing rights of way • Create new rights of way, as required, or extend existing rights of way either by agreement by or by way of compulsory powers in the interest of ensuring access to amenities. In particular, rights of way should be provided from built up areas to the countryside. • Prohibit development and keep free from obstruction existing rights of way and walking routes and take legal action if necessary to prevent any attempt to close them off. • Prohibit development which would prejudice public access to existing rights of way, unless specific arrangements are made for suitable alternative linkages. • Look favourably upon planning applications which include proposals to improve the condition and appearance of existing rights of way. • Developments will not be permitted where a public way will be affected unless the level of amenity is minimised by; <ol style="list-style-type: none"> i. The footpath/bridleway being diverted by the minimum practical distance and the route continuing to be segregated from vehicular traffic ii. Appropriate legal procedures have been undertaken to extinguish the existing right of way and to establish the new right of way to replace it. • Existing rights of way and established walking routes shall be established prior to any new 		
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planting, new infrastructural development and any new energy/telecommunication developments.		
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6.7 Local Zoning Objectives

LZO Submissions

Request	Sub. No.	Map No.	Manager's Response and Recommendation
The buildings subject to Specific Objective LZO1 be re-zoned for Enterprise and Employment, EP 3	0145	Map 1	<p>Manager's Response Local Zoning Objective 1. Cooldrinagh- Redevelopment of Former Co-Op Site sets out clearly the view of the Planning Authority in relation to the appropriate use of this site considering its location within a Green Belt Zone.</p> <p>Manager's Recommendation No change recommended.</p>
Local Zoning Objective No 4- Grange Castle Golf Course The Department of Defence shall be consulted in relation to any proposed developments	0218	Map 1	<p>Manager's Response The Department of Defence would be consulted in any case as Grange Castle Golf Course falls within the Approach Zone of Casement Aerodrome. However, given the aviation safety issues at stake, it is considered reasonable to include specific wording to this effect in the text of the SLO.</p> <p>Manager's Recommendation Insert the following text at end of LZO 4: <i>'The Department of Defence shall be consulted in relation to any proposed developments.'</i></p>
Support for LZO 1 – Cooldrinagh – Redevelopment of Former Co-Op Site.	0063	Map 1	<p>Manager's Response Comment noted.</p> <p>Manager's Recommendation No change recommended.</p>

<p>The area west of the existing warehouses at the Cooldrinagh lands be provided for a Park and Ride facility and Petrol Filling Station</p>	<p>0145</p>	<p>Map 1</p>	<p>Manager's Response Local Zoning Objective 1. Cooldrinagh- Redevelopment of Former Co-Op Site sets out clearly the view of the Planning Authority in relation to the appropriate use of this site considering its location within a Green Belt Zone.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Suggest LZO 1. Cooldrinagh be deleted.</p>	<p>0158</p>	<p>Map 1</p>	<p>Manager's Response Local Zoning Objective 1. Cooldrinagh- Redevelopment of Former Co-Op Site set out clearly the view of the Planning Authority in relation to the appropriate use of this site considering its location within a Green Belt Zone.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Add the following sentence to LZO 2 - Primrose Hill - Sheltered Housing: The Council will endeavour to facilitate access to new public amenities as part of this scheme.</p>	<p>0063</p>	<p>Map 1</p>	<p>Manager's Response It is considered that LZO 2 reasonably reflects the ownership issues on the lands and sets out clearly the intentions of the Council for any future development at this location.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Request that land in their ownership be included under Local Objective No. 2 (LZO2) "to facilitate the provision of sheltered housing" and would like the LZO to include the following sentence: the provision of a nursing home in conjunction with Sheltered Housing.</p>	<p>0099 0210</p>	<p>Map 1</p>	<p>Manager's Response It is considered reasonable to allow for the provision of a nursing home in conjunction with sheltered housing at this location subject to full consideration of such a proposal through the Development Management process.</p> <p>Manager's Recommendation Amend wording of LZO 2. Primrose Hill, Lucan- Sheltered Housing to read;</p>

			Facilitate the provision of sheltered housing in conjunction with a nursing home through development which has regard to the amenity and heritage importance of Primrose Hill House, a protected structure, and its gardens.
Propose that the draft plan be amended to include the following Local Zoning Objective 6. Hazelhatch – Residential Marina Village Facilitate the development of a Residential Marina Village at Hazelhatch subject to the preparation of the framework plan for the Kildare rail corridor.	0236	Map 1	<p>Manager's Response It is considered that the framework plan which will be prepared under Local Zoning Objective 3. Rail Corridor- Framework will set out sequential development along the rail corridor providing for the development of existing zoned lands in accordance with the core strategy of the Draft Plan which aims to provide a more consolidated and compact urban form for the County. It is considered that the inclusion of this objective would be inappropriate for this plan period.</p> <p>Manager's Recommendation No change recommended.</p>
Propose lands at Hazelhatch as a location for a new strategic settlement and therefore Local Objective 3 should specify Hazelhatch as a strategic site that will form part of the framework plan that will identify future development along the rail corridor. Request that Local Objective 3 be amended as follows: "Facilitate the preparation of a detailed framework plan for the identification of future development along the rail corridor from the city boundary to the Kildare county boundary within a 1 km catchment of the line. This framework plan will consider future economic and enterprise, commercial, residential and amenity development."	0238	Map 1	<p>Manager's Response It is considered that this framework plan will set out sequential development along the rail corridor providing for the development of existing zoned lands in accordance with the core strategy of the Draft Plan which aims to provide a more consolidated and compact urban form for the County. It is considered that the inclusion of these lands would be inappropriate for this plan period.</p> <p>Manager's Recommendation No change recommended.</p>
Propose that LZO 3 be amended as follows "Facilitate the preparation of a detailed framework plan for the identification of future development along the rail corridor from the city boundary to the Kildare county boundary within a 1km catchment of the line. This framework plan will consider future economic and enterprise, commercial,	0236	Map 1	<p>Manager's Response It is considered that this framework plan will set out sequential development along the rail corridor providing for the development of existing zoned lands in accordance with the core strategy of the Draft Plan which aims to provide a more consolidated and compact urban form for the County. It is considered that the inclusion of these</p>

residential and amenity development.”			lands would be inappropriate for this plan period. Manager's Recommendation No change recommended.
Support for LZO 3 – Rail corridor - Framework	0197	Map 1&2	Manager's Response Comment noted. Manager's Recommendation No change recommended.
Request that the 2010-2016 plan should also include an objective to facilitate the regeneration of the Naas Road Corridor and provide for a more intensive mix of urban uses which capitalise on the excellent public transport accessibility.	0163	Map 2	Manager's Response The County Development Plan 2004-2010 included a Local Zoning Objective 5. N7 Gateway Corridor – Upgrading. This Objective has been fulfilled through the preparation of the Naas Road Framework which has undergone a rigorous public consultation. The framework is comprehensive in nature and in the Council's view the LZO has been finalised. Manager's Recommendation No change recommended.
Local Zoning Objective No. 5 in current development plan- be retained in the new development plan insofar as it related to the area extending from Newlands cross to the m50 interchange.	0169	Map 2	Manager's Response The County Development Plan 2004-2010 included a Local Zoning Objective 5. N7 Gateway Corridor – Upgrading. This Objective has been fulfilled through the preparation of the Naas Road Framework which has undergone a rigorous public consultation. The framework is comprehensive in nature and in the Council's view the LZO has been finalised. Manager's Recommendation No change recommended.
Request that LZO 8 from existing plan be reinstated within draft plan and read as follows “Facilitate the development	0163	Map 2	Manager's Response The County Development Plan 2004-2010 included a Local Zoning

<p>of the site on the north side of the Naas Road, east of St. Brigid's cottages for appropriate high quality, mixed use development. The lands have potential to accommodate high density development in accordance with their strategic location adjacent to existing and planned public transport infrastructure"</p>			<p>Objective 5. N7 Gateway Corridor – Upgrading. This Objective has been fulfilled through the preparation of the Naas Road Framework which has undergone a rigorous public consultation. The framework is comprehensive in nature and in the Council's view the LZO has been finalised.</p> <p>Manager's Recommendation No change recommended.</p>
<p>It is requested that the existing Local Zoning Objective 8 of the current 2004-2010 Development Plan is reinstated within the 2010-2016 Plan. However, it is requested that the 2010-2016 Development Plan should acknowledge that the proposed Naas Road Gateway Urban Design Masterplan currently being undertaken by the Council fulfils the requirements of Local Zoning Objective 8, and that no further Masterplan be required in respect of these lands. It is therefore submitted that the wording of Local Objective 8 within the 2010-2016 Development Plan should read as follows: 'Facilitate the development of the site on the north side of the Naas Road, east of St. Brigid's Cottages for appropriate high quality, mixed-use development. The lands have potential to accommodate high density development in accordance with their strategic location adjacent to existing and planned public transport infrastructure'.</p>	0191	Map 2	<p>Manager's Response The County Development Plan 2004-2010 included a Local Zoning Objective 5. N7 Gateway Corridor – Upgrading. This Objective has been fulfilled through the preparation of the Naas Road Framework which has undergone public consultation. The framework is comprehensive in nature and in the Council's view the LZO has been finalised.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Update and replace LZO14 Request zoning of lands south of the terminus at Fortunestown Lane and land currently occupied by Citywest Golf Course) to EP1 for a tourist resort and third level education.</p>	0262	Map 3	<p>Manager's Response It is considered that the relevant provisions of the draft Development Plan provide adequate scope for the appropriate development of leisure and tourism related facilities at this location, having regard to the nature and scale of the existing approved facilities and to the existing zoning of the lands to the west of Garter Lane.</p> <p>It is considered that third level education facilities would be more</p>

			<p>appropriately located in a designated town centre area. Consolidation / strengthening of the designated town centres particularly the County Town of Tallaght is a key aim of the Core Strategy of the Draft Plan which aims to provide a more consolidated and compact urban form for the County. Designation of the lands for third level education facilities as requested in this submission would be contrary to the Core Strategy of the Draft Plan.</p> <p>Manager's Recommendation No change recommended.</p>
Proposed LZO on lands currently occupied by the Citywest Lakes golf course (north end) to read: To facilitate development of Third Level Education in accordance with policy SCR14, to support the development and ongoing provision of Third Level Education and development of competences in innovation, product design and R&D.	0262	Map 3	<p>Manager's Response It is considered that third level education facilities would be more appropriately located in a designated town centre area, having regard to the green belt zoning on the lands to the south of Fortunestown Lane. Consolidation / strengthening of the designated town centres particularly the County Town of Tallaght is a key aim of the Core Strategy of the Draft Plan which aims to provide a more consolidated and compact urban form for the County. Designation of the lands for third level education facilities as requested in this submission would be contrary to the Core Strategy of the Draft Plan.</p> <p>Manager's Recommendation No change recommended.</p>
Request zoning of lands south of the terminus at Fortunestown Lane and land currently occupied by Citywest Golf Course to EP1 for a tourist resort and third level education.	0262	Map 3	<p>Manager's Response It is considered that the relevant provisions of the draft Development Plan provide adequate scope for the appropriate development of leisure and tourism related facilities on the lands to the west of Garter Lane, having regard to the nature and scale of the existing approved facilities and to the existing zoning of the lands.</p> <p>It is considered that third level education facilities would be more</p>

			<p>appropriately located in a designated town centre area, having regard to the green belt zoning on the lands to the south of Fortunestown Lane. Consolidation / strengthening of the designated town centres particularly the County Town of Tallaght is a key aim of the Core Strategy of the Draft Plan which aims to provide a more consolidated and compact urban form for the County. Designation of the lands for third level education facilities as requested in this submission would be contrary to the Core Strategy of the Draft Plan.</p> <p>Manager's Recommendation No change recommended.</p>
Residential element of LZO 7 be deleted and the land acquired and added to Tymon Park.	0158	Map 4	<p>Manager's Response It is considered reasonable to include this element of LZO 7. Cuckoo's Nest/Tymon Park- Residential Development in order to retain a good standard of housing mix in the area and to contribute to security and passive surveillance of Tymon Park.</p> <p>Manager's Recommendation No change recommended.</p>
Support for the reinstatement of existing Local Zoning Objective 12 – Spawell, Templeogue – Mixed-Use Redevelopment in the next County Development Plan, subject to various changes proposed: Facilitate redevelopment of the Spawell Sorts and Leisure Centre, Wellington Lane, Templeogue, for commercial, leisure, health, well-being, education and recreational purposes. An acceptable development proposal would include a sports centre incorporating indoor and outdoor sports facilities, and complementary mixed uses including an ancillary hotel of 200 bedrooms with conference facilities and integral staff accommodation, a nursing home, primary healthcare and step-down healthcare facilities or	0125	Map 4	<p>Manager's Response It is considered that the proposed LZO would be acceptable- the Planning Authority would support such development on foot of this Local Zoning Objective.</p> <p>Manager's Recommendation Insert new LZO. Spawell, Templeogue- Mixed Use Redevelopment</p> <p><i>“Facilitate redevelopment of the Spawell Sorts and Leisure Centre, Wellington Lane, Templeogue, for commercial, leisure, health, well-being, education and recreational purposes. An acceptable development proposal would include a sports centre incorporating indoor and outdoor sports facilities, and complementary mixed uses</i></p>

<p>other similar scheme. Any development on the lands to be carefully designed to a scale and height appropriate to its proximity to the Green Belt.</p>			<p><i>including an ancillary hotel of 200 bedrooms with conference facilities and integral staff accommodation, a nursing home, primary healthcare and step-down healthcare facilities or other similar scheme. Any development on the lands to be carefully designed to a scale and height appropriate to its proximity to the Green Belt."</i></p>
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6.8 Specific Local Objectives

SLO Submissions

Request	Sub. No.	Map No.	Manager's Response and Recommendation
<p>Consideration should be given to the inclusion of Specific Local Objectives to ensure protection and appropriate assessment of ecological corridors within the Plan area.</p>	0254	General	<p>Manager's Response Policy LHA 19: Flora and Fauna sets out that no primary ecological corridors or parts thereof which provide significant connectivity are to be lost without mitigation as a result of the implementation of the Plan. Section 1.3.31 Open Space and Policy SCR40: Green Routes Network recognises the benefit Green Routes can have on ecological corridors which aid the retention of biodiversity while the issue of the protection of such corridors is carried through each section of the Draft Plan.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Request that the Plan provide that all SLOs provided for in the 2004 Plan be undertaken within two years of the adoption of this plan.</p>	0018	General	<p>Manager's Response It is the policy of the Council to carry out all tasks and actions as outlined in the plan. However the completion of these actions is subject to the resources of the Planning Department during the lifetime of the Plan, and as such a commitment of two years from adoption is not feasible.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Particular attention should be paid to a "number of the locations which have been identified as floodplains zoned for development in the 2004-2010 CDP and are carried</p>	0003	General	<p>Manager's Response Comments noted.</p>

<p>through into the current Draft CDP”.</p>			<p>Manager’s Recommendation Floodplain SLO to be indicated on Development Plan Maps located alongside the potential flooding areas; <i>SLO: The areas of flooding potential as indicated in the Dodder Catchment Flood Risk Assessment Management Study (CFRAMS) and the OPW “alluvial soils” floodplain maps are to be taken into account along with the requirements of Section 5 of The Planning System and Flood Risk Management Guidelines (November 2009) when assessing planning applications, with a view to restricting or, if necessary, refusing development proposals within such areas in order to avoid flooding events.</i></p>
<p>Absence of a Biodiversity Action Plan and other Biodiversity Studies and flood assessment are major deficiency- County Plan cannot be considered in the absence of these and other matters.</p>	<p>0105 0137 0138</p>	<p>General</p>	<p>Manager’s Response Comments noted.</p> <p>Manager’s Recommendation <i>Floodplain SLO to be indicated on Development Plan Maps located alongside the potential flooding areas; SLO: The areas of flooding potential as indicated in the Dodder Catchment Flood Risk Assessment Management Study (CFRAMS) and the OPW “alluvial soils” floodplain maps are to be taken into account along with the requirements of Section 5 of The Planning System and Flood Risk Management Guidelines (November 2009) when assessing planning applications, with a view to restricting or, if necessary, refusing development proposals within such areas in order to avoid flooding events.</i></p>
<p>The plan includes for additional connectivity to the national roads network at Cloverhill (SLO 26) and Keatings Park (SLO 60) however there will be a presumption by the NRA against further junction capacity increases on the motorway/high quality dual carriageway network.</p>	<p>0008</p>	<p>General</p>	<p>Manager’s Response Comment noted.</p> <p>Manager’s Recommendation No change recommended.</p>

<p>Specific Local Objective No. 44: Greenogue – Completion of New Road: The Department of Defence would request that it be consulted in relation to this development.</p>	<p>0218</p>	<p>Map 1</p>	<p>Manager's Response The Department of Defence would be consulted in any case as the line of the proposed road is in close proximity to Casement Aerodrome. However, given the aviation safety issues at stake, it is considered reasonable to include specific wording to this effect in the text of the SLO.</p> <p>Recommendation: Insert the following text at end of SLO 44: <i>'The Department of Defence shall be consulted in relation to this development'.</i></p>
<p>The SLO to retain and protect the character of the 12th Lock Canal Bridge should include the Lock which is a listed structure. The industrial zoning would create noise pollution along the existing rural canal corridor contrary Objectives Nos. 1 and 2 of the Grand Canal Study.</p>	<p>0131</p>	<p>Map 1</p>	<p>Manager's Response It is considered that the 12th Lock is sufficiently protected under its inclusion in the Record of Protected Structures (ref; 125) and under Policy AA7: Conservation of Buildings, Structures and Sites. The adjacent lands, which were previously zoned objective E ' <i>To provide for enterprise, employment and related uses</i>' is now zoned objective EP2 ' <i>To facilitate opportunities for manufacturing, Research and Development Facilities, light industry and employment and enterprise related uses in industrial areas and business parks</i>' and it is considered that the retention of the enterprise and employment related zoning objective for these lands is in line with the Core Strategy of the Draft Plan, particularly the intention to promote significant new economic development along defined economic corridors based on fixed and developing public transport corridors.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Specific Local Objective No 23- Griffeen Valley Park-Biodiversity. Any work in this area, particularly provision of lakes/water features, may pose an attractant for waterfowl posing a threat to air safety at Casement. Any</p>	<p>0218</p>	<p>Map 1</p>	<p>Manager's Response Griffeen Valley Park falls outside the area within which the Department of Defence would be consulted regarding proposed developments. Given the aviation safety issues involved (i.e. the</p>

<p>developments in this area should be subject to consultation with Department of Defence</p>			<p>risk of birdstrike), it is considered that reference to consultation with the Department of Defence is justified.</p> <p>Recommendation Add the following text to SLO 23: <i>'Any such works in this area should be subject to consultation with the Department of Defence, due to the possibility of waterfowl posing a threat to air safety at Casement Aerodrome'.</i></p>
<p>Request to remove reference to car parks from SLO 1 Liffey valley Amenity</p>	<p>0105 0137 0138 0144</p>	<p>Map 1</p>	<p>Manager's Response The Draft Plan, through policies LHA3, LHA4, LHA5, LHA6, LHA7 and LHA8 provides for the protection and preservation of the Liffey Valley. SLO 1. Liffey Valley- Amenity provides for the detailed consideration of the need for additional car parking, which will be considered in view of the relevant policies as set out.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Support for a public park at Cooldrinagh, which would incorporate the Tara Co-op Lands.</p>	<p>0117</p>	<p>Map 1</p>	<p>Manager's Response LZO 1. Cooldrinagh- Redevelopment of Former Co- Op Site gives sufficient guidance on the future development of these lands considering its location within a Green Belt Zone.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Request that an SLO for the Profile Park lands allowing for the development of offices over 1,000sq.m in accordance with the agreed Masterplan for the lands</p>	<p>0050 0121</p>	<p>Map 1</p>	<p>Manager's Response The issue of offices within the EP2 zoned lands has been considered as part of The Busy Place and the Zoning Objectives Matrix as set out in the draft Plan and it is considered that an SLO in relation to this is not warranted.</p> <p>Manager's Recommendation No change required.</p>

<p>Request new SLO on profile park lands at Kilbride stating that any future development of the lands for employment uses shall be determined following archaeological and conservation assessment having regard to the protected structure and recorded monument on site.</p>	<p>0119 0247</p>	<p>Map 1</p>	<p>Manager's Response The Draft Plan set out clearly the Policies and Objectives in relation to the protection of the Built Heritage, Protected Structures and Recorded Monuments of the County in Section 4.2 Archaeological and Architectural Heritage. In particular Policy AA11: Development Proposals involving Protected Structures sufficiently deals with this issue and it is considered that such an SLO is not required.</p> <p>Manager's Recommendation No change recommended.</p>
<p>LZO/SLO: - To facilitate coordinated development of infrastructure appropriate to an executive airport at Weston Executive Airport in liaison with Kildare County Council as an asset serving both counties within the Dublin Metropolitan Area.</p>	<p>0241</p>	<p>Map 1</p>	<p>Manager's Response It is considered that the Draft plan, through Policies EE40 and EE42 as well as Sections 3.2.20 Aerodromes and 3.2.22 General Guidance for Development in the Vicinity of Aerodromes provides a suitable indication of the use of the lands that would be supported by the Council.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Suggest amend SLO 8 to read To continue to investigate and acquire land adjoining Waterstown Park at Palmerstown (Coates Land) to be incorporated into the Liffey Valley Regional Park. In doing so both the former Waterstown House, its outbuildings and 'White's Bridge'/iron bridge should be fully restored as features associated with the Park.</p>	<p>0158</p>	<p>Map 1</p>	<p>Manager's Response SLO 8. Palmerstown- Waterstown Park provides a suitably clear indication on the Planning Authorities intentions for these lands at this time.</p> <p>Manager's Recommendation No change recommended.</p>
<p>SLO 30 – Grange Castle Business Park (Notation) Concerned at the possible loss of clean air, which is required to run the Microsoft business at the Grange</p>	<p>0203</p>	<p>Map 1</p>	<p>Manager's Response The Grange Castle Business Park Area is subject to a framework plan which sits separately to the Draft Plan. Any future planning</p>

<p>Castle Business Park, due to the rezoning of land in the Clutterland area of the County. Requests that SLO 30 – Grange Castle Business Park notation be also noted on the newly proposed industrial land; on lands that fall within 1.5 km of the Grange Castle Business Park and on the Milltown lands proposed for a 'Civic Amenity Site' or 'Bring Centre'. All on Development Plan Map 1.</p>			<p>applications within the area referred to will be assessed in accordance with the policies and objectives as set out in the Draft Plan in the interest of proper planning and sustainable development.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Request for a SLO for the development of the Grand Canal at Hazelhatch as a water-based activity and walking trails between Dublin and Kildare.</p>	0107	Map 1	<p>Manager's Response It is considered that such a proposal is acceptable subject to the necessary environmental protections, the approval of Waterways Ireland and in accordance with Policy LHA22: Protection of the Grand Canal- which sets out the intention facilitate the provision of a cycle-way on one side in association with Waterways Ireland and sets out that all development proposals adjoining the Grand Canal should be accompanied by a Biodiversity Action Plan, including mitigation measures, where appropriate. Such an SLO could serve to compliment SLO 6. River Liffey and Grand Canal – Strategy.</p> <p>Manager's Recommendation Insert new SLO Grand Canal- Hazelhatch Facilitate the development of the Grand Canal at Hazelhatch as a location for water based activities and walking trails between Dublin and Kildare subject to the approval of Waterways Ireland and the development of a sustainable strategy for the Grand Canal as set out in SLO 6. River Liffey and grand Canal- Strategy.</p>
<p>Request that a SLO is added as follows: "Where suitable development proposals are brought forward in Palmerstown, the Planning Authority will consider relaxing the provisions of the zoning matrix set out in Section 1 of this Plan in order to ensure the appropriate level of service provision in the village."</p>	0118	Map 1	<p>Manager's Response It is not considered appropriate to relax the zoning matrix as set out in the Draft plan for the Palmerstown Area as a result of its close proximity to the Town Centre of Liffey Valley- a Tier 2 Retail Centre, particularly in light of the Liffey Valley Town Centre Local Area Plan and the developments at this location which are likely to</p>

			<p>be carried out as a result.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Amend SLO 10 – N4 Pedestrian Bridge to read: "Should more than 200 residential units be populated at the Liffey Valley Town Centre, the Council will, as an objective work to secure the provision of a high quality pedestrian bridge over the N4 to provide a spacious landscaped boulevard linking Liffey Valley Town Centre to the Liffey Valley High Amenity Area to the north."</p>	0063	Map 1	<p>Manager's Response The Draft Plan is clear in its intentions with regard to the provision of a pedestrian bridge over the N4 through SLO 10. N4-Pedestrian Bridge and it is not considered appropriate to amend it as such at this time.</p> <p>Manager's Recommendation. No change recommended.</p>
<p>Suggests deletion of the phrase 'or traffic roundabout' from SLO 13 – Palmerstown Traffic.</p>	0063	Map 1	<p>Manager's Response The wording of SLO 13. Palmerstown – traffic allows for the capacity to consider various options for this location as recommended by suitably qualified experts in the area of traffic management and planning.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Add the following sentence to SLO 2 – Liffey Valley – Footpath and Cycleway "In addition the Council will seek to provide an additional pedestrian route linking St Edmundsbury/Woodville with Shackelton's Mill in Fingal and liaise with Fingal County Council regarding same."</p>	0063	Map 1	<p>Manager's Response It is considered that the Draft Plan provides adequate guidance for the protection and development of the Liffey Valley through policies LHA3, LHA4, LHA5, LHA6, LHA7 and LHA8 as well as through SLO 1. Liffey Valley- Amenity which provides specifically for the amenity development of the Liffey Valley.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Amend SLO 3 to read: "Commence public consultation process regarding the extension of the Special Amenity</p>	0063	Map 1	<p>Manager's Response The Planning Authority is clear in its intentions, through SLO 3.</p>

<p>Area Order to include all of the lands at Lucan Demesne, the Embassy - owned lands, the area behind Lucan BNS, St Edmondsbury, Fonthill, Woodville, the Kings Hospital and Waterstown Park, extending from the River Liffey up to the N4 and bordered by the Leixlip-Lucan Slip Road..."</p>			<p>Liffey Valley- Extension of SAAO of the Draft Plan to investigate the extension of the Special Amenity Area Order and it is not considered necessary to amend this SLO at this time.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Suggests adding the following sentence to SLO 30 – Grange Castle Business Park: "The Council will seek in the first instance to encourage businesses that provide high levels of employment" Reason: At present some of the companies that pay rates employ very small numbers of people but take up huge tracts of space. The land in SDCC is limited so we need a better mix of employer.</p>	<p>0063</p>	<p>Map 1</p>	<p>Manager's Response Any applications for development in the Grange Castle Business park will be assessed based on the land use zoning objective EP2 'To facilitate opportunities for manufacturing, Research and Development Facilities, light industry and employment and enterprise related uses in industrial areas and business parks' It is considered that this zoning objective, in addition to the provisions of the Revised Grange Castle Masterplan 2005 sufficiently provide for employment generation in light of the objectives of the Local Authority and the Industrial Development Agency.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Requests that a car park be facilitated in the vicinity of Gaelscoil Naomh Pdraig Castle Road Lucan for the use of parents dropping off and collecting children from the school. Suggests that the waste ground behind the school could be a place for a temporary car park.</p>	<p>0052 0149 0143</p>	<p>Map 1</p>	<p>Manager's Response</p> <p>The Draft Plan contains policies which adhere to the 'Provision of Schools and the Planning System, A Code of Practice for Planning Authorities', issued by the Department of Education and Science and the Department of the Environment, Heritage and Local Government in July 2008, with particular reference to siting and other urban design and sustainable development considerations.</p> <p>Policy SCR13: Sustainable Transport and Travel Plans for Schools states "It is a policy of the Council to target schools for priority action on sustainable transport and travel plans, with scope for significant improvements to be made in conjunction with</p>

			<p>principles, teachers, parents/guardians, boards of management and pupils."</p> <p>This policy reflects a strategic objective of the draft Development Plan "to promote a sustainable urban form based on the concept of a compact city characterised by ease of access to public transport, schools and community uses, parks, shops and the work place, without recourse to the private car". In this regard it is considered that the provision of additional car parking facilities at schools is likely to sustain and increase existing car dependency levels whereas the thrust of the development plan strategy is to seek to promote the greater use of alternative modes of transport such as walking and cycling, and public transport.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Would like to put forward the proposal that a provision for parking must urgently be considered on the waste ground behind the Gaelscoil Naomh Padraig Castle Road Lucan Co Dublin. This should be a temporary car park that is only open when parents are dropping off and collecting their children from school and thus reducing the opportunity for anti-social behaviour to take place in the car park.</p>	<p>0057</p>	<p>Map 1</p>	<p>Manager's Response</p> <p>The Draft Plan contains policies which adhere to the 'Provision of Schools and the Planning System, A Code of Practice for Planning Authorities', issued by the Department of Education and Science and the Department of the Environment, Heritage and Local Government in July 2008, with particular reference to siting and other urban design and sustainable development considerations.</p> <p>Policy SCR13: Sustainable Transport and Travel Plans for Schools states "It is a policy of the Council to target schools for priority action on sustainable transport and travel plans, with scope for significant improvements to be made in conjunction with principles, teachers, parents/guardians, boards of management and pupils."</p>

			<p>This policy reflects a strategic objective of the draft Development Plan "to promote a sustainable urban form based on the concept of a compact city characterised by ease of access to public transport, schools and community uses, parks, shops and the work place, without recourse to the private car". In this regard it is considered that the provision of additional car parking facilities at schools is likely to sustain and increase existing car dependency levels whereas the thrust of the development plan strategy is to seek to promote the greater use of alternative modes of transport such as walking and cycling, and public transport.</p> <p>Manager's Recommendation No change recommended.</p>
Bat species are protected under both National and EU law and the policy relating to lighting of key buildings and the Liffey Bridge within the Plan for Lucan has the potential to impact adversely on bat species where they are present.	0164 0283	Map 1	<p>Manager's Response Comment Noted.</p> <p>Manager's Recommendation Insert additional text to SLO7 Lucan- Lighting of Key Buildings as follows; The design of any proposed future lighting of the Liffey Bridge shall be subject to assessment of the impact of such lighting on bat roosting, hunting and movements.</p>
Request SLO for the rehabilitation and reuse Esker House by a relaxation of the authority's Development Management requirements	0037	Map 1	<p>Manager's Response It is considered that the Draft Plan contains sufficient policies and objectives to guide the redevelopment or reuse of Protected Structures, particularly Policies AA7: Conservation of Buildings, Structures and Sites, AA10: Retention of Older Buildings and AA11: Development Proposals involving Protected Structures. It is considered inappropriate to relax the Development Management requirements for the redevelopment or reuse of any Protected Structure. A detailed proposal for the rehabilitation of such a structure can be considered through the planning process</p>

			<p>in accordance with the policies and provision of the Draft Plan.</p> <p>Manager's Recommendation No change recommended.</p>
Supports SLO 6 – River Liffey and Grand Canal.	0107	Map 1&2	<p>Manager's Response Comment Noted.</p> <p>Manager's Recommendation No change recommended.</p>
Support for the following SLO's: SLO 1 – Liffey Valley – Amenity; SLO 4 – Liffey Valley – Regional Park; SLO 5 – Lucan – Church of Ireland School; SLO 8 – Palmerstown-Waterstown Park; SLO 11 – Libraries Building Programme; SLO 18 – Quarryvale Estate – Traffic Calming; support for SLOs 21-25; SLO 28 – 12th Lock Canal Bridge; SLO 29 – Clondalkin Theatre; SLOs 31-36 and 38-39.	0063	Map 1&2	<p>Manager's Response Comments noted.</p> <p>Manager's Recommendation No change recommended.</p>
NRA is not likely to be responsible for financing the provision of pedestrian bridges under SLO 10 & 48 as these are not an NRA priority.	0008	Map 1&3	<p>Manager's Response Comment noted.</p> <p>Manager's Recommendation No change recommended.</p>
Request that a Specific Objective be attached to the site which requires the preparation of an Area Action Plan to address access, connectivity to public transport and the longer term integration with adjoining lands in Clondalkin Industrial Estate.	0165	Map 2	<p>Manager's Response The Draft Plan though LZO 3. Rail Corridor- Framework sets out the intention to facilitate the preparation of a detailed framework plan for the identification of future development long the rail corridor which will consider future economic and enterprise development, among others. These lands are zoned objective EP2 ' <i>To facilitate opportunities for manufacturing, Research and Development Facilities, light industry and employment and</i></p>

			<p><i>enterprise related uses in industrial areas and business parks'</i> and any future planning applications on these lands will be considered in view of this.</p> <p>Manager's Recommendation No change recommended.</p>
<p>It is suggested that a local objective be applied to the subject site (Dublin city Services Sports and Social club, Coldcut Road) and will be dependent on the delivery of the Luas Line F and would incorporate community facilities.</p>	0213	Map 2	<p>Manager's Response These lands are zoned Objective F 'To preserve and provide for open space and recreational amenities' in the Draft Plan. It is not considered appropriate or in line with the Core Strategy of the Plan which sets out priority areas for the development of lands for enterprise and economic purposes as well as to protect appropriate residential amenity, enhancing the quality of life to provide for such a local objective at this time.</p> <p>Manager's Recommendation. No change recommended.</p>
<p>Requests Specific Local Objective on lands at Monastery Road, Clondalkin similar to the current SLO 45</p>	0173	Map 2	<p>Manager's Response It is considered that the 'Lands at Monastery Road Site Development Brief' which was approved by the Council Members in November 2007 will form the basis for consideration of any future planning applications on this site subject to the policies contained in the Living Place.</p> <p>Manager's Recommendation Insert SLO reflecting that a development brief approved by the elected members applies to these lands, subject to the policies contained in the living place..</p>
<p>Amend SLO 19 – Glenaulin Park Improvements to read: Continue to improve Glenaulin Park as neighbourhood park for a wide range of both active and passive recreational activities; in particular take measures to enhance the entrances to the park and to provide for</p>	0063	Map 2	<p>Manager's Response It is considered that SLO19. Glenaulin Park- Improvements adequately provides for local clubs through the intention to improve the park for a wide range of both active and passive recreational activities, particularly focusing on measures to</p>

<p>additional car parking, as well as provide facilities for local clubs to improve access and security.</p>			<p>enhance the entrances to the park. Manager's Recommendation No change recommended.</p>
<p>A specific objective to facilitate Park and Ride on the IRFU lands at Newlands Cross zoned GB.</p>	0028	Map 2	<p>Manager's Response It is considered that the Draft Plan contains sufficient Polices and Objectives to address the issue of the location of Park and Ride facilities in the County- particularly section 2.2.22 Park and Ride Facilities, Policy T18: Park and Ride Facilities and Table 2.2.3: Proposed Park and Ride Sites. It is not considered appropriate to provide a Specific Objective for such a facility at this location at this time. Manager's Recommendation No change recommended.</p>
<p>The NRA considers the inclusion of the rezoning as well as SLO 58 and 59 are inappropriate as they will seriously compromise the capacity, efficiency and operation of the N7 and recommends that these elements of the Draft Plan should be omitted</p>	008	Map 2&3	<p>Manager's Response Comment noted. The capacity and efficiency of the N7 would have to be considered as part of any framework plan that would be prepared for the development of lands. Manager's Recommendation No change recommended.</p>
<p>Welcome the inclusion of Local Objective No.48: to provide a pedestrian footbridge/ling across the N7, from Barneys Lane area to the north to the Garters Lane area to the south,</p>	0129	Map 3	<p>Manager's Response Comments noted. Manager's Recommendation No change recommended.</p>
<p>If the Planning Authority considers that an EP3 zoning designation should be provided for in the vicinity of Profile Park, suggest the following addition to SLO 36 " Any planning application on these EP3 zoned lands will be considered premature pending the preparation and</p>	0260	Map 3	<p>Manager's Response The wording of SLO 36. Enterprise Lands- Framework Plan as currently drafted is considered to be clear and allows for opportunities for ordered development in the County.</p>

<p>agreement of the Council of the Action Area Plan.</p>			<p>Manager's Recommendation No change recommended.</p>
<p>Request a policy statement and associated Local Zoning Objective/Specific Local Objective, be attached relating to a higher education campus south of Fortunestown Lane Saggart stating "to facilitate development of Third Level Education in accordance with policy SCR14. to support the development and ongoing provision of Third Level Education and development of competences in innovation, product design and R & D"</p>	<p>0224</p>	<p>Map 3</p>	<p>Manager's Response It is considered that such facilities would be more appropriately located in a designated town centre area. Consolidation / strengthening of the designated town centres particularly the County Town of Tallaght is a key aim of the Core Strategy of the Draft Plan which aims to provide a more consolidated and compact urban form for the County. Designation of the lands as requested in this submission would be contrary to the Core Strategy of the Draft Plan.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Suggested wording for a SLO: It is an objective of the Council to prioritise the development of indigenous renewable energy resources within the County. In this context it is an objective of the County Development Plan to support the continued investigation of the potential and scale of the deep geothermal heat resources within the County, including confirmed available resources at Newcastle. It is also a specific local objective of the Council to support a pilot project to demonstrate the exploitation and use of the renewable energy resource in a new energy self-sufficient residential community adjacent to Newcastle. This will facilitate the development of future growth areas in the county in a sustainable manner. The specific local objective boundaries of the pilot project lands are outlined on Map 3 of the Development Plan at Newcastle. The development of the renewable energy pilot project lands shall be subject to the following provision: No development whatsoever can</p>	<p>0216</p>	<p>Map 3</p>	<p>Manager's Response It is considered that the provisions contained in the Draft County Development Plan and the recommended additions, are appropriate and adequate expressions of the Council's support and encouragement for renewable energy initiatives in the County, having regard to the Core Strategy set out in the Draft County Development Plan.</p> <p>It should be noted that a number of landowners in the vicinity of Newcastle have previously sought without success to have their lands (comprising of 172 hectares 425 acres) which included the lands relating to the proposed specific local objective, rezoned for residential development by means of a variation of the County Development Plan. The report to members in relation to that proposal concluded that:</p> <ul style="list-style-type: none"> • it would be contrary to the Regional Planning Guidelines for the Greater Dublin Area (RPG-GDA), • it would have strategic implications for the future

<p>take place within the specific local objective boundaries until the potential and capacity of the geothermal energy resource has been proven and demonstrated to the satisfaction of the Council.</p>			<p>development of the County that should not be considered outside the Development Plan review process,</p> <ul style="list-style-type: none"> • it would be contrary to the tests for zoning/re-zoning agreed by Council in the preparation of the Development Plan 2004-2010. These tests were largely re-stated in Guidelines for Planning Authorities on Development Plans issued by the Department of Environment, Heritage and Local Government recently. • it would radically alter the nature and extent of the village of Newcastle and increase its population to town size, • it would not represent the only mechanism for delivering affordable housing in the area and, critically • it would not deliver sustainable development. <p>It is considered that these conclusions remain valid.</p> <p>It is further considered that the effect of the proposed specific local objective would be to establish a basis for the rezoning of a substantial tract of greenfield land (44 hectares – 109 acres) on a part of the lands previously sought to be rezoned as outlined above. It is considered highly likely that the insertion into the County Development Plan of the proposed Specific Local Objective would create a strong expectation on the part of other landowners of having their lands designated for development on similar grounds of sustainability.</p> <p>It is considered that, as the conclusions above remain valid and having regard to the availability of undeveloped zoned land within both the Newcastle area and the wider county, notwithstanding having considered the arguments made in relation to potential renewable energy resources in the area, that the proposed Specific Local Objective is contrary to the Core Strategy of the Draft Plan which aims to provide a more consolidated and compact urban form for the County. Given the existing availability and location of zoned residential land coupled with the widespread opportunity for mixed-use and infill development within the County,</p>
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			<p>it is considered that no expansion of residentially zoned land is required at this time.</p> <p>Manager's Recommendation No change recommended.</p>
<p>LZO to facilitate development of Major Leisure Facilities under Policy EE27 including: - • An integrated dedicated holiday park for family visitors; • Health tourism facilities; • A large-scale integrated holiday complex featuring high quality accommodation conference and mix of activity measures; • Events arena; • 'soft Adventure' facilities.</p>	0262	Map 3	<p>Manager's Response It is considered that the relevant provisions of the draft Development Plan provide adequate scope for the appropriate development of leisure and tourism related facilities at this location, having regard to the nature and scale of the existing approved facilities and to the existing zoning of the lands to the west of Garter Lane.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Request for the development of GAA grounds at Rathcoole.</p>	0288	Map 3	<p>Manager's Response The provision of such sporting facilities at specific locations in the County is an issue which is best dealt with separately to the Development Plan process through the ongoing works of the Parks and Landscape Services. Policy SCR38: Future Improvements in open Space sets out the intention to continue to develop more intensive recreational facilities within its parks and open spaces.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Request that the Plan include a 'Specific Local objective' for the Profile Park lands allowing for the development of offices over 1,000m² in accordance with the agreed Masterplan for the lands.</p>	0251	Map 3	<p>Manager's Response The issue of offices within the EP2 zoned lands has been considered as part of The Busy Place and the Zoning Objectives Matrix as set out in the draft Plan and it is considered that an SLO in relation to this is not warranted.</p>

			<p>Manager's Recommendation No change required.</p>
Request that an SLO be put on lands located within the Saggart Greenbelt to facilitate the development of a retirement village.	0221	Map 3	<p>Manager's Response The subject lands are zoned GB "to preserve a green belt between development areas". It is considered that further piecemeal development on the lands would seriously prejudice the future maintenance of the open character of the green belt lands, and as such would be inconsistent with the zoning objective and contrary to the stated policy of the Council.</p> <p>Manager's Recommendation No change recommended.</p>
Amend SLO 15 – Newcastle Road – Parkland/Woodland to read: Vesey Park enhancement and protection Enhance and promote the small area of parkland/ woodland known as Vesey Park, which is entranced at Vesey Park estate and beside Moat House on the Newcastle Road. The prime objective should to be [to] encourage more pedestrian visits to this park area and a study should be carried out to see if this is achievable. The possibility of turning some of the usable land into allotments should be considered.	0063	Map 3	<p>Manager's Response The Planning Authority , through SLO 15- Newcastle Road- Parkland/Woodland of the Draft Plan is clear in its intentions to enhance and promote this park- The provision of allotments is addressed through Section 1.3.41 Allotments and relevant Policies SCR61: Allotments and SCR62: Allotments in New Residential Developments of the Draft Plan.</p> <p>Manager's Recommendation No change recommended.</p>
Request that SLO 61 – Rathcoole, immediately north of the property, be deleted because construction is taking place on the site and there appears to be no evident planning purpose.	0215	Map 3	<p>Manager's Response While it is recognised that development has been carried out on this site it is considered prudent to retain this SLO at this time in the interest of clarity for the assessment of future planning applications.</p> <p>Manager's Recommendation</p>

			No change recommended.
Great concern in relation to SLO 60 and 62. Feel that the interchange at Rathcoole is sufficient and that the feasibility of providing an interchange at Keating's Park is not to serve the residents of Rathcoole. We would question the coupling of the aeronautical study and the screening of street lighting (which is not practical) in the context of this Specific Local Objective	0154	Map 3	<p>Manager's Response SLO 60 – Rathcoole – Keating's Park Interchange The feasibility of providing this interchange is to be examined as the Rathcoole Interchange east of Keating's Park is at capacity and the interchange at Steelstown west of Keating's Park has limited traffic capacity.</p> <p>SLO 62 – Rathcoole Distributor Road A Part 8 was proposed to the Council for the Rathcoole/Saggart distributor Road – Fitzmaurice Road to Keatings Park N7 junction to Boherboy road. On 10th July 2006 the Council approved a section of this Part 8 from the GAA lands to the tie in at Keating's Park. The remainder of the proposal, including the section in Rathcoole Park and the Saggart Relief Road, was eliminated from the part 8 pending a further study to be carried out on completion of the Naas Road works and Phase 3 of the Outer Ring Road. Although these roads are now completed, this study has not been carried out yet. When this study has taken place the remainder of the proposed road will be reviewed.</p> <p>Only a section of the approved Part 8 is a six year road objective. This section runs from Stony Lane to the GAA lands. The approved section from Stony Lane to Keating's Park is a long term road proposal.</p> <p>Manager's Recommendation No change recommended.</p>
Consider that this distributor road to the South of Rathcoole directly contravenes the Council's own policies notably; 1.3.3 Groups with Specific Design/Planning Needs, 1.3.3.i Young People and Children; 4.3.9.vii Policy LHA30: Green Structure; 4.3.9.iii Policy LHA26:	0154	Map 3	<p>Manager's Response This submission refers to the Rathcoole Distributor Road cutting through a green area referred to locally as Rathcoole Park. The current Draft Development Plan map does not have a road alignment marked through this area. Any proposed road would be</p>

Preservation of Major Natural Amenities.			<p>put through the Part 8 procedure which requires public consultation.</p> <p>Manager's Recommendation No change recommended.</p>
It is requested that a Specific Local Objective be applied to the lands, "to provide for Primary Education Facilities", at Swiftbrook Saggart	0093	Map 3/4	<p>Manager's Response The Draft Development Plan identifies a suitable site for the future provision of a Primary School in this area which was designated through a Local Area Plan process and is identified in the Draft Development Plan Maps.</p> <p>Manager's Recommendation No change recommended.</p>
Objects to further apartment development taking place in Balrothery.	0020 0072	Map 4	<p>Manager's Response It is considered in the interests of proper planning and sustainable development, and in order to maintain the intentions of SLO 52 to protect the residential amenity of adjoining dwellings in Balrothery to reinstate the wording of SLO 75 as set out in the current County Development Plan.</p> <p>Manager's Recommendation SLO 52. Balrothery Estate- Residential Development to be reworded to read;</p> <p>SLO 52. Balrothery Estate- Density Ensure the density of any future developments on the private lands at the south west side of Balrothery Estate (two cottages) shall be limited to the density already in Balrothery.</p>
SLO 52- Request reinstatement of wording from existing SLO 75	0021 0019 0073 0080	Map 4	<p>Manager's Response It is considered in the interests of proper planning and sustainable development, and in order to maintain the intentions of SLO 52 to protect the residential amenity of adjoining dwellings in Balrothery</p>

	0081 0082 0074 0075 0076 0083 0085 0032 0041 0069 0086 0087 0090 0091 0038		<p>to reinstate the wording of SLO 75 as set out in the current County Development Plan.</p> <p>Manager's Recommendation SLO 52. Balrothery Estate- Residential Development to be reworded to read;</p> <p>SLO 52. Balrothery Estate- Density Ensure the density of any future developments on the private lands at the south west side of Balrothery Estate (two cottages) shall be limited to the density already in Balrothery.</p>
SLO 52- proposed new wording. "Ensure that the density of any future development on the private lands at the South west side of Balrothery Estate (two cottages) shall be limited to the density already in Balrothery and shall have regard to the protection of residential amenity for the adjoining dwellings"	0023	Map 4	<p>Manager's Response It is considered in the interests of proper planning and sustainable development, and in order to maintain the intentions of SLO 52 to protect the residential amenity of adjoining dwellings in Balrothery to reinstate the wording of SLO 75 as set out in the current County Development Plan.</p> <p>Manager's Recommendation SLO 52. Balrothery Estate- Residential Development to be reworded to read;</p> <p>SLO 52. Balrothery Estate- Density Ensure the density of any future developments on the private lands at the south west side of Balrothery Estate (two cottages) shall be limited to the density already in Balrothery.</p>
No objection to any development on lands in Balrothery Estate that is in line with existing housing in the estate	0084	Map 4	<p>Manager's Response It is considered in the interests of proper planning and sustainable development, and in order to maintain the intentions of SLO 52 to</p>

			<p>protect the residential amenity of adjoining dwellings in Balrothery to reinstate the wording of SLO 75 as set out in the current County Development Plan.</p> <p>Manager's Recommendation SLO 52. Balrothery Estate- Residential Development to be reworded to read;</p> <p>SLO 52. Balrothery Estate- Density Ensure the density of any future developments on the private lands at the south west side of Balrothery Estate (two cottages) shall be limited to the density already in Balrothery.</p>
Object to proposed development at cottages at Balrothery	0079 0089	Map 4	<p>Manager's Response It is considered in the interests of proper planning and sustainable development, and in order to maintain the intentions of SLO 52 to protect the residential amenity of adjoining dwellings in Balrothery to reinstate the wording of SLO 75 as set out in the current County Development Plan.</p> <p>Manager's Recommendation SLO 52. Balrothery Estate- Residential Development to be reworded to read;</p> <p>SLO 52. Balrothery Estate- Density Ensure the density of any future developments on the private lands at the south west side of Balrothery Estate (two cottages) shall be limited to the density already in Balrothery.</p>
Specific Local Objective No. 38: Corkagh Park – Sporting Centre: Any work in this area, particularly provision of lakes/water features or development likely to cause pooling of water, may pose an attractant for waterfowl posing a threat to air safety at Casement. Any developments in this area should be subject to	0218	Map 4	<p>Manager's Response Part of Corkagh Park falls within the area about which the Department of Defence would be consulted regarding proposed developments, while part falls outside. Having regard to the aviation safety implications of the issue in question and the proximity of the Park to the Aerodrome, it is considered that the</p>

<p>consultation with the Department of Defence. The Department would not be in favour of the provision of a fishing lake in such proximity to an approach path.</p>			<p>proposed amendment is justified.</p> <p>Recommendation Insert the following text at end of SLO 38: <i>'Any work in this area, such as provision of lakes/water features or development likely to cause pooling of water, which may pose an attractant for waterfowl and therefore might in turn pose a threat to air safety at Casement Aerodrome, should be subject to consultation with the Department of Defence'.</i></p>
<p>Suggest delete SLO 63 as this area should not be rezoned industrial as the road infrastructure in this location is not suited to increased industrial traffic</p>	0158	Map 4	<p>Manager's Response It is considered that zoning objective EP 2 <i>'To facilitate opportunities for manufacturing, Research and Development Facilities, light industry and employment and enterprise related uses in industrial areas and business parks'</i> on these lands is in line with the Core Strategy of the Draft Plan and the SLO provides for sufficient protection of residential amenity in accordance with proper planning and sustainable development.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Request that the Draft Plan be amended to provide a SLO for the SDS site on the Naas Road which will seek "to promote mixed use commercial development (including offices greater than 1000sq.m)subject to a master-plan being prepared for the site and to include due regard for access, egress and capacity"</p>	0120	Map 4	<p>Manager's Response The issue of offices within the EP2 zoned lands has been considered as part of The Busy Place and the Zoning Objectives Matrix as set out in the Draft Plan and it is considered that an SLO in relation to this is not warranted.</p> <p>Manager's Recommendation No change required.</p>
<p>Request that a Specific Local Objective be added to the Heiton zoned lands on the N7 and adjoining lands around the Red Cow LUAS which would seek "to promote mixed use commercial development (including offices greater</p>	0103	Map 4	<p>Manager's Response The issue of offices within the EP2 zoned lands has been considered as part of The Busy Place and the Zoning Objectives Matrix as set out in the Draft Plan and it is considered that an SLO</p>

<p>than 1,000 sqm) subject to a master-plan being prepared for the site and to include due regard for access, egress and capacity.”</p>			<p>in relation to this is not warranted.</p> <p>Manager's Recommendation No change required.</p>
<p>Request that an SLO be designated on the lands “ to provide that 20 residential units shall be constructed on the site in conjunction with the ceding into public ownership of that part of the lands required to implement the Council's objective to develop the Dodder Valley Linear Park and that the ceding of the portion of the lands for a walkway along the Dodder be agreed previously in consultation Parks and Planning Departments”.</p>	0124	Map 4	<p>Manager's Response These lands are zoned objective G 'To protect and improve high amenity areas' within the Dodder Valley. It is considered that this would be an inappropriate location to provide for residential development having regard to the fact that visually the area is part of the wider Dodder Valley landscape, at the point where the valley widens from the urban area and starts to take on a more rural aspect. Development would impact on this aspect as well as potentially creating flooding and water pollution risk. Development at this location would also be contrary to the Core Strategy of the Draft Plan as set out.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Propose new SLO “The old stone wall boundary of the Clondalkin Rugby Club grounds facing the Old Naas Road should be retained but may need to be rebuilt further back from its present location to facilitate the creation of a public footpath along that part of the east side of the Old Naas Road.”</p>	0106	Map 4	<p>Manager's Response It is considered that the issue of the provision of specific footpaths in the County and any impacts on existing infrastructure as a result would be dealt with outside of the Development Plan Process by the relevant Departments in the Council.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Propose new SLO “The mature trees in the grounds of both the Roadstone Social Club and the Clondalkin Rugby Club should be retained as they provide both a valuable setting for the amenities of both clubs as well as a very important visual and natural amenity for the residents of Kingswood Village”</p>	0106	Map 4	<p>Manager's Response The protection of existing mature trees is a theme which is addressed across all sections of the Draft Plan. Specifically Policy LHA17:Trees and Woodlands provides for the protection and preservation of trees, groups of trees or woodlands which form a significant features in the landscape, or are important in setting the</p>

			<p>character of an area.</p> <p>Manager's Recommendation No change recommended.</p>
Propose new SLO "There shall be a unified approach to directional signage for Kingswood Village along the roads leading into Kingswood Village. All such signs should include the term Kingswood Village rather than Kingswood so as to make it absolutely clear to visitors that Kingswood Village is a different place with its own locational identity to Kingswood Heights	0106	Map 4	<p>Manager's Response Kingswood Village is zoned Objective LC 'To protect, provide for and/or improve Local Centre Facilities'. This objective provides sufficient basis for examining proposals for the Village and the protection/improvement of its facilities.</p> <p>Manager's Recommendation No change recommended.</p>
Propose new SLO "A landscaping scheme shall be provided for Kingswood Village to complement the proposed traffic calming scheme for Kingswood Village in order to improve its visual identity and sense of place. There appears to be a particular opportunity in this context to landscape the area on the west side of the Old Naas Road as one approaches Kingswood Village from the Outer Ring Road. This landscaping scheme should also seek to improve the landscaping of the east side of the N7 behind the village"	0106	Map 4	<p>Manager's Response Kingswood Village is zoned Objective LC 'To protect, provide for and/or improve Local Centre Facilities'. This objective provides sufficient basis for examining proposals for the Village and the protection/improvement of its facilities. Specific issues relating to traffic calming are not matters for the Development Plan Process and are more suitably dealt with through the relevant departments of the Council.</p> <p>Manager's Recommendation No change recommended.</p>
Propose new SLO "South Dublin County Council shall limit any further attempt to develop the Belgard Quarry to the spatial extent and activities permitted for the Belgard Quarry under SDQU05A/2 whose quarry registration permission became effective on 18 April 2007 within the lifetime of this County Development Plan in the interests of the proper planning and sustainable development of this very large quarry area which is close to Kingswood Village.	0106	Map 4	<p>Manager's Response The Planning and Development Acts 2000-2009 provides the basis for the Council to consider any planning applications or proposals for the development at Belgard Quarry and it is through the planning process that it is most appropriately dealt with.</p> <p>Manager's Recommendation No change recommended.</p>

<p>Propose new SLO "Because Kingswood Village currently lacks a retail convenience grocery store South Dublin County Council shall use its best endeavours to encourage the developer of the Silken Park estate to construct immediately the proposed retail units there provided for under existing planning permissions SD05A/0438 and SD06A/0221"</p>	<p>0106</p>	<p>Map 4</p>	<p>Manager's Response Kingswood Village is zoned Objective LC 'To protect, provide for and/or improve Local Centre Facilities'. This objective provides sufficient basis for examining proposals for the Village and the protection/improvement of its facilities. The requested SLO is not within the remit of the Development Plan.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Propose new SLO "It shall be an objective of this County Development Plan to preserve the mature trees within the grounds of Kingswood House and the adjoining Maldron Hotel in order to provide an appropriate setting for Kingswood House as a Protected Structure and in the interest of the visual amenities of the area."</p>	<p>0106</p>	<p>Map 4</p>	<p>Manager's Response The protection of existing mature trees is a theme which is addressed across all sections of the Draft Plan. Specifically Policy LHA17:Trees and Woodlands provides for the protection and preservation of trees, groups of trees or woodlands which form a significant features in the landscape, or are important in setting the character of an area.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Propose new SLO "The County Council shall initiate discussions with Citywest Ltd., the owners of Citywest Business Park with the objective of agreeing the creation of a link in the form of pedestrian paths between the Citywest Business Park and Kingswood Village in the interests of pedestrian permeability and recreational amenity"</p>	<p>0106</p>	<p>Map 4</p>	<p>Manager's Response Policies and Objectives for the provision of pedestrian permeability are set out across all sections of the Draft Plan, particularly Section 1.4 Sustainable Neighbourhoods places a strong focus on permeability and pedestrian linkages and Section 2.2 Transportation places a strong focus on pedestrian activity. It is considered that the policies and objectives as set out provide sufficient guidance in relation to this issue and such an SLO is not necessary.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Propose new SLO "It shall be an objective for the County</p>	<p>0106</p>	<p>Map 4</p>	<p>Manager's Response</p>

<p>Council to prepare a report on the amenity potential for Kingswood Village of the stream running from Citywest Business Park along the southern boundary of Silken Park in Kingswood Village, which then crosses under the Old Naas Road before disappearing under the N7.”</p>			<p>Polices and objectives for the protection of streams are set out across a number of section of the Draft Plan, particularly Policy LHA 20: River and Stream Management provides for the implementation of a strategy prepared on a regional basis for the management of rivers and streams throughout the County. It is considered that these polices coupled with the provision of the Draft Heritage Plan provide sufficient guidance in relation to this issue and such an SLO is not required.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Propose new SLO “The section of the Old Naas Road which is now closed as a public road between Kingswood House(Protected Structure) and Wilson’s Car Auctions shall be retained in County Council ownership with the aim of the County Council providing controlled off street car parking there to service Kingswood Village generally and specifically to facilitate existing uses in the Kingswood area such as matches organised by Clondalkin Rugby Club and Wilson’s Car Auctions so as to discourage unauthorised car parking along the Old Naas Road in the interests of pedestrian and vehicular traffic safety and circulation by the residents of Kingswood Village</p>	0106	Map 4	<p>Manager's Response It is considered that Plans and Policies as set out in the Draft Plan in relation to car parking in the County – particularly under section 2.1 Transportation- provide sufficient guidance in relation to this issue and such and SLO is not required.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Request for the inclusion of a SLO within the County Development Plan to read as follows: Lands at Bohernabreena Road, Old Bawn (2.6ha) To consider proposals for a Waste Transfer/Recycling facility subject to an agreed Environmental Management Plan and the implementation of Policy LHA 28 within the extent of the lands, providing for a continuous strip of public open space of a minimum depth of 20m along the full river frontage of the site. This area is to be ceded to/taken in</p>	0151	Map 4	<p>Manager's Response The lands are zoned Objective G ‘To protect and improve High Amenity Areas. It is considered that the development of a waste transfer/recycling facility would be inappropriate at this location- with particular regard to the fact that the Environmental Report indicates that these lands are subject to significant flooding and are located on a flood plain. No development which would be impacted by flooding, or require flood management measures is recommended on these lands. A waste transfer station on the</p>

<p>charge by Planning Authority.</p>			<p>subject site poses a serious pollution risk to the river and the pNHA downstream. In addition Policy LHA 13: Development within High Amenity Areas or Mountain Areas of the Draft plan sets out that any new development not related directly to the area's amenity potential will not be permitted.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Request for the inclusion of a SLO within the County Development Plan to read as follows: Lands at Bohernabreena Road, Old Bawn (2.6ha) To consider proposals for medium density residential development, subject to implementation of Policy LHA28 within the extent of the lands, providing for a continuous strip of public open space of a minimum depth of 20m along the full river frontage of the site. This area is to be ceded to/taken in charge by Planning Authority.</p>	<p>0152</p>	<p>Map 4</p>	<p>Manager's Response The lands are zoned Objective G 'To protect and improve High Amenity Areas. It is considered that the development of medium density residential development at this location would be contrary to the provisions of the Core Strategy of the Draft Plan which aims to provide a more consolidated and compact urban form for the County and would particularly contravene the provisions of Policy LHA 13: Development within High Amenity Areas or Mountain Areas which sets out that any new development not related directly to the area's amenity potential will not be permitted. It is also noted that the Environmental Report indicates that these lands are subject to significant flooding and are located on a flood plain. No development which would be impacted by flooding, or require flood management measures is recommended on these lands.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Request for the inclusion of a SLO within the County Development Plan to read as follows: Lands at Bohernabreena Road, Old Bawn (2.6ha) To consider proposals for nursing home development, subject to an agreed Environmental Management Plan and the implementation of Policy LHA28 within the extent of the</p>	<p>0153</p>	<p>Map 4</p>	<p>Manager's Response The lands are zoned Objective G 'To protect and improve High Amenity Areas. It is considered that the provision of a nursing home at this location would be inappropriate having regard to Policy H21: Locations for Housing for the Elderly which sets out that accommodation for the elderly should be located in existing</p>

<p>lands, providing for a continuous strip of public open space of a minimum depth of 20m along the full river frontage of the site. This area is to be ceded to/taken in charge by Planning Authority.</p>			<p>residential areas, well served by infrastructure and amenities in order not to isolate residents and allow for better care in the community, independence and access. It is also considered that such a proposal would contravene the provisions of Policy LHA 13: Development within High Amenity Areas or Mountain Areas which sets out that any new development not related directly to the area's amenity potential will not be permitted. It is also noted that the Environmental Report indicates that these lands are subject to significant flooding and are located on a flood plain. No development which would be impacted by flooding, or require flood management measures is recommended on these lands</p> <p>Manager's Recommendation No change recommended.</p>
<p>Specific Local Objective be designated on their site located adjacent to the M50 / N7 junction to facilitate re-development of the site for a landmark office building</p>	0171	Map 4	<p>Manager's Response The County Development Plan 2004-2010 included a Local Zoning Objective 5. N7 Gateway Corridor – Upgrading. This Objective has been fulfilled through the preparation of the Naas Road Framework which has undergone a rigorous public consultation. The framework is comprehensive in nature and in the Council's view the LZO has been finalised. It is considered therefore that such and SLO is not appropriate.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Proposed Oldcourt Kiltipper bridge is not acceptable if it is a public vehicular bridge as it would open up the Dodder Valley in this area to highly undesirable development</p>	0158	Map 4	<p>Manager's Response The Draft Plan, through SLO 66. Oldcourt, Kiltipper- Bridge is clear in its intent to include a bridge at this location with sufficient protection for the Dodder River and its landscape and biodiversity with proposals for improvement of the accessibility and amenity of the River.</p>

			<p>Manager's Recommendation No change recommended.</p>
Request that it is an objective of the Development Plan to fully promote and develop the Corkagh Fisheries as a year long community facility and to include as much local employment and involvement as possible	0245	Map 4	<p>Manager's Response The issue of specific uses within the parks of the County is more appropriately dealt with outside of the Development Plan process through the ongoing work of the Parks and Landscape Services and Development Department where appropriate. It is not a function of nor appropriate for the Development Plan to indicate particular sporting uses in the County.</p> <p>Manager's Recommendation No change recommended.</p>
There needs to be a SLO to develop Aylesbury open space as a fully functioning amenity for the safe and full enjoyment of the entire community. It currently provides sporting facilities, with minimal other amenities for the wider community. It cannot be accessed fully by wheelchairs or pedestrians with prams. It does not have complete walkways, nor is it fully secured on all sides by appropriate boundaries. It is vulnerable to illegal access by scramblers & cars.	0139	Map 4	<p>Manager's Response The Draft Development Plan, through Section 1.3.31 Open Space set out clear polices on the intentions for the development of open spaces within the County and the provision for increased accessibility. It is considered inappropriate however to identify one particular area of open space over another for such development and through the Parks and Landscape services this type of improvement/development of open space will be identified and facilitated where appropriate.</p> <p>Manager's Recommendation No change recommended.</p>
Specific Local Objective No. 72: Tallaght – Public Golf Course: The Department of Defence would request that it be consulted in relation to this development.	0218	Map 4	<p>Manager's Response SLO 72 states '<i>Facilitate the provision of a public golf course facility to serve the Tallaght area.</i>' This request for consultation relates to landscape works that might involve water features and the attendant possibility of waterfowl. Given the issue of aviation safety, the request for the Department of Defence to be consulted is considered reasonable.</p>

			<p>Recommendation Add the following text to SLO 72: <i>'The Department of Defence shall be consulted in relation to any such proposals'.</i></p>
Propose new SLO "It will be an objective of this County Development Plan to provide a traffic calming scheme along the Old Naas Road from the area south of the Maldron Hotel at Kingswood House to the turn off from the Old Naas Road into the Citywest Business Park before the Luas extension to Citywest is opened in 2011 in the interests of the safety of residents and pedestrians in the Kingswood Village area."	0106	Map 4	<p>Manager's Response Kingswood Village is zoned Objective LC 'To protect, provide for and/or improve Local Centre Facilities'. This objective provides sufficient basis for examining proposals for the Village and the protection/improvement of its facilities.</p> <p>Manager's Recommendation No change recommended.</p>
The realignment / replacement of the N81 between Tallaght and Baltinglass should not impede development in the wider constraints study area.	0071	Map 4	<p>Manager's Response The selection of the final route for all national roads is a function of the National Roads Authority subject to constraints laid down in the Design Manual for Roads and Bridges and the Development Plan. Once a route is selected, all applications not constrained by the final road reservation will be considered on their merits.</p> <p>Manager's Recommendation No change recommended.</p>
With recent events believe that a Specific Local Objective should be attached to the following 1. Bolton Hall 2. River Glin 3. Owendoher River	0258	Map 5	<p>Manager's Response Policy LHA 20: River and Stream Management sets out the policy of the Council to implement a strategy on a regional basis for the management of rivers and streams throughout the County. SLO 69. Owendoher River- Linear Park is currently in place in the Draft Plan. Bolton Hall is included in the Record of Protected Structures under Schedule 2 of the Draft Plan and is in private ownership, it is not considered appropriate or necessary to provide an SLO on this site.</p>

			<p>Manager's Response No change recommended.</p>
SLO68 Ballycullen/Stocking Lane Distributor Road The road has been open for a number of years and has been provided with bus bays and a cycle track. Requests that the SLO be reviewed.	0289	Map 5	<p>Manager's Response Given the existence of the road which is open to the public it is considered that the SLO be removed</p> <p>Manager's Recommendation Delete SLO68</p>
The Ballyboden Village Area Masterplan SLO93 is not a statutory plan and has not been completed – yet the impression given by Draft Document is that it has been completed and is a LAP - this is wholly misleading	0258	Map 5	<p>Manager's Response The Ballyboden Village Area Masterplan has been completed.</p> <p>Manager's Recommendation No change recommended.</p>
Specific Local Objective: "Facilitate the sensitive development of the lands adjoining Marlay Grange House, to the south of Grange Road in Rathfarnham, for high quality (not more than 2 houses to the acre) low density residential development having regard to: • Protection of the integrity of the protected structure and its curtilage • Protection of existing mature trees and subject to detailed Arborist assessment • Protection of the amenity of the overall setting, shelter development from road and visual impact of adjoining park • Subject to necessary infrastructure upgrades for piped services."	0108	Map 5	<p>Manager's Response It is considered that Marlay Grange House, a Protected Structure is in urgent need of conservation and restoration works as the structure has fallen into a state of neglect. It is considered that to ensure the continued maintenance and upkeep of the structure a suitable use needs to be found thus preventing further deterioration. The restoration and conservation of the structure could be viably achieved through a sensitive and appropriate type of development within the curtilage. This would be conducive to maintaining the architectural importance and integrity of Marlay Grange House which could be reached by including a Specific Objective in the Development Plan.</p> <p>Manager's Recommendation Insert SLO; Marlay Grange House: To facilitate the sensitive development of the lands adjoining Marlay Grange House, to the south of Grange Road in Rathfarnham, for high quality (not more than 2 houses to the acre) low density residential development having regard to: • Protection</p>

			of the integrity of the protected structure and its curtilage • Protection of existing mature trees and subject to detailed Arborist assessment • Protection of the amenity of the overall setting, shelter development from road and visual impact of adjoining park and amenities • Subject to necessary infrastructure upgrades for piped services.
Request SLO at Bloomfield Care Centre, Stocking Lane "To protect and provide for medical and care related uses associated with the operation of Bloomfield Care Centre, Stocking Lane."	0051	Map 5	<p>Manager's Response It is considered that developments at this site have, to date, been appropriately dealt with through the planning process and in the interests of proper planning and sustainable development any future development proposals will be assessed and dealt with as such.</p> <p>Manager's Recommendation No change recommended.</p>
Request for the imposition of a SLO on lands at Whitechurch, Rathfarnham, "to support the provision of a 'one-stop' primary care medical centre, nursing home and group GP practices/consultancies in purpose built premises in accordance with HSE requirements."	0227	Map 5	<p>Manager's Response Policy SCR 29: Surgeries for Medical Practitioners provides support for the provision of 'one stop' primary care medical centres and GP practises along public transport routes and at locations easily accessible to members of the wider community. It is not considered appropriate at this time to designate these lands for such a use through a Specific Local Objective. In the interest of proper planning and sustainable development, and considering the policies of the Draft Plan which relate to Backland Development and also Development Proposals Involving Protected Structures, such a proposal would be assessed through the planning process.</p> <p>Manager's Recommendation No change recommended.</p>
Request for review of densities on SLO 71	0011	Map 5	Manager's Response

			<p>While the detailed submission has been considered, given the location of the subject lands in the foothills of the mountains removed from existing large scale development, the density provisions set out in SLO 71. Edmondstown- Residential Development are considered to be in line with the Core Strategy of the Draft Plan – particularly in recognition that, at this time, no expansion, other than small urban infill of residentially zoned land is required and with respect to medium and longer term residential development – future residential expansion will be considered in the context of its proximity to stations on main railway lines, building on the strategy of promoting more sustainable linked communities.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Improve safe access to existing and future educational and recreational development at Rockbrook by working with landowners to seek improvements to existing traffic problems when new development is being planned and authorised.</p>	0132 0231	Map 5	<p>Manager's Response Such improvements can be addressed as a development management operational matter in relation to any future planning applications in the context of the importance of the biodiversity and existing environment at this location in accordance with the proposed SLO - Rockbrook Park School- Education Facilities.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Request the reinstatement of SLO 119 from current plan which should read "Facilitate the sustainable development and expansion of educational / community facilities on the lands of Rockbrook Park School"</p>	0132 0231	Map 5	<p>Manager's Response It is considered appropriate to reinstate this objective into the Plan, however it is important to note the Ballyboden Road at the boundary with Rockbrook School is a biodiversity corridor with many mature trees and associated undergrowth, coupled with the adjacent riverine system. Widening or re-aligning the road could have significant impacts on these habitats.</p> <p>Manager's Recommendation</p>

			Insert new SLO: Rockbrook Park School- Educational Facilities; “Facilitate the sustainable development and expansion of educational/community facilities on the lands at Rockbrook Park School while taking cognisance of the importance of the biodiversity and existing environment at this location.”
New SLO that reserves the lands for the relocation Objective EP3 compatible uses from Objective EP2 or EP1 zoned areas from the Naas Road Framework Plan Area, and the preparation of a Masterplan for the lands.	0166	Map 6	Manager's Response The policies and strategies of the Draft Plan provide sufficient opportunities to achieve the appropriate relocation of lands uses in accordance with proper planning and sustainable development. Manager's Recommendation No change recommended.
SLO 73 - Brittas Village - Planning Study Would like the reinstatement of the following sentence from the current Development Plan SLO 123: 'a reasonable development boundary be established for the study of the Brittas village'.	0071	Map 6	Manager's Response It is considered that the intentions of the Planning Authority with regard to the preparation of a Planning Study for Brittas Village and the implications of the proposed Natural Heritage Area designations on the area and it is not considered appropriate to insert this wording at this time. Manager's Recommendation No change recommended.
The submission raises specific issues relating to Brittas including the need for traffic calming in the area; an upgrading of road conditions; a request for a road-cleaner once a week, and to preserve and enforce the maintenance of hedgerows at Brittas to allow for safer use of footpaths.	0071	Map 6	Manager's Response Specific issues relating to traffic calming, road maintenance and a request for a sweeper, and hedgerow maintenance are not matters for the Draft Development plan. Manager's Recommendation No change recommended.
Request SLO “That the Planning Authority recognise the interest of persons local to or linked to rural areas, who	0243	Map 7	Manager's Response The Draft Plan sets out clearly the policies and provisions for

<p>are not engaged in significant agricultural or rural resource related occupation, to live in rural areas and that a planning and housing study be carried out to examine how the needs of local people might be accommodated in the Bohernabreena / Glenasmole / Ballinascorney Area"</p>			<p>development of housing in rural areas in section 1.2.9 Rural Housing, 1.2.51 Management of One – Off Housing in Rural Areas and subsequent policies H29-H40. The planning authority is not in a legal position to take into consideration the individual personal circumstances of applicants applying for permission for a one-off rural dwelling. All applications are assessed based on the criteria included in the Development Plan and associated Plans in a fair and equitable manner, which underpins the core principle of the Irish planning system which is based on the common good and sustainable development supported by local democracy and public participation.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Requests that a car park be facilitated in the vicinity of Gaelscoil Naomh Pdraig Castle Road Lucan for the use of parents dropping off and collecting children from the school. Suggests that the waste ground behind the school could be a place for a temporary car park. (No map included)</p>	<p>0053 0054 0055 0094</p>	<p>MAP1</p>	<p>Manager's Response</p> <p>The Draft Plan contains policies which adhere to the 'Provision of Schools and the Planning System, A Code of Practice for Planning Authorities', issued by the Department of Education and Science and the Department of the Environment, Heritage and Local Government in July 2008, with particular reference to siting and other urban design and sustainable development considerations.</p> <p>Policy SCR13: Sustainable Transport and Travel Plans for Schools states "It is a policy of the Council to target schools for priority action on sustainable transport and travel plans, with scope for significant improvements to be made in conjunction with principles, teachers, parents/guardians, boards of management and pupils."</p> <p>This policy reflects a strategic objective of the draft Development Plan "to promote a sustainable urban form based on the concept of a compact city characterised by ease of access to public</p>

			<p>transport, schools and community uses, parks, shops and the work place, without recourse to the private car". In this regard it is considered that the provision of additional car parking facilities at schools is likely to sustain and increase existing car dependency levels whereas the thrust of the development plan strategy is to seek to promote the greater use of alternative modes of transport such as walking and cycling, and public transport.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Request a policy to install allotments at the Lexington site.</p>	<p>0245</p>	<p>Proposed SLO - Allotments Lexington</p>	<p>Manager's Response It is the intention of the Planning Authority to utilise lands which are zoned Objective A ' To protect and/ or improve residential amenity' in village sites, for appropriate uses in line with the Core Strategy of providing a more consolidated and compact urban form for the County. The provision of allotments is addressed through Section 1.3.41 Allotments and relevant Policies SCR61: Allotments and SCR62: Allotments in New Residential Developments of the Draft Plan.</p> <p>Manager's Recommendation No change recommended.</p>

6.9 Schedules:

1 Record of Monuments

2 Record of Protected Structures

3 Definition of Use Classes

4 Casement Aerodrome, Baldonnell

5 Weston Aerodrome Lucan

6.9.1 Schedule 1 Record of Monuments

Issue	Sub No	Map No	Manager's Response and Recommendations
Schedule 1 Record of Monuments and Places			
<p>Request the removal of entry 021021 from the Record of Monuments and Places by means of the appropriate procedure.</p> <p>Three Ring Fort, Windmill Hill should be included in the record of monuments and places.</p> <p>Request for the removal of entry DU021 021 – Ringfort(Rath/Cashel) - from the Record of Monuments and Places.</p> <p>Windmill Stump Rathcoole be considered an historical and protected site and that no development including waste incinerator be permitted there.</p> <p>Preservation of Landscape Character; including the Windmill Stump and Lyons Hill (Newcastle)</p> <p>Lyons Hill Newcastle be designated an historical and protected area</p>	<p>0129 0154 0127 0281</p>		<p>Manager's Response The Record of Monuments and Places as set out in Schedule 1 of the Draft Plan contains recorded sites and features of historical and archaeological importance included in the Record of Monuments and Places, published by Duchas, The Heritage Service in 1998 as established under Section 12 of the national Monuments (Amendment) Act,1994. Any additions or deletions to Schedule 1 of the Draft Plan are informed by amendments to this record made by The Heritage Service and cannot be initiated by the Council.</p> <p>Manager's Recommendation No change recommended.</p>

6.9.2 Schedule 2 Record of Protected Structures

Issue	Sub No	Map No	Manager's Response and Recommendations
Schedule 2 Record of Protected Structures			
<p>The maintenance of distinct vernacular buildings within the village of Rathcoole should be included in Schedule 2 of Record of Protected Structures in order to preserve the sense of place of Rathcoole. In particular the cottages opposite Rathcoole House, Rathcoole House, The Glebe (now fire damaged), the 3 Bay 2 storey terrace beside Scoil Chronain, the cottages beside Scoil Chronain and the 2 Storey house opposite the Garda station should be preserved.</p>	0154		<p>Manager's Response A considerable body of work was carried out following the completion of the National Inventory of Architectural Heritage survey of the County in 2002 in assessing the recommended structures for inclusion on the Record of Protected Structures by the Minister for Environment, Heritage and Local Government for the County Development Plan 2004-2010. The structures which are located in Rathcoole which are included on the RPS are considered to be the best representative sample of structures which are of special architectural, historic, archaeological, artistic, cultural, social or technical interest in the area. Having reviewed suggestions for the inclusion of structures it is considered at this time that no additional structures in Rathcoole will be added to the Record of Protected Structures.</p> <p>Manager's Recommendation No change recommended.</p>
<p>All vernacular dwellings and their associated features, e.g., outbuildings, walls, etc., across the administrative area of South Dublin should be deemed worthy for inclusion on the list of protected structures, and that a specific paragraph should be included in the body of the text under the above heading outlining their local, national and regional importance. All buildings/structures in the ownership of South Dublin County Council should, if not already, be included for addition on the list of protected structures, e.g. Friarstown House and farm buildings. Suggest a list of structures with a strong focus</p>	0158		<p>Manager's Response</p> <p>The Draft Plan is clear, through Policy AA9: Features of Interest and Policy AA10: Retention of Older Buildings, in its intent to protect and retain where feasible the wide variety of vernacular buildings, which contribute in a particular way to distinctive character of local areas, which can be significantly diminished by their loss through demolition or replacement.</p> <p>A considerable body of work was carried out following the completion of the National Inventory of Architectural Heritage</p>

<p>on cottages and rural buildings for inclusion in the Record of Protected Structures</p>			<p>survey of the County in 2002 in assessing the recommended structures for inclusion on the Record of Protected Structures by the Minister for Environment, Heritage and Local Government for the County Development Plan 2004-2010. There are many examples of cottages and rural buildings across the County and the Record of Protected Structures contains what is considered to be the best representative sample of these structures.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Particular concern for the very old cottages to be found in Glenasmole which are well documented in several academic publications. The clachan settlement pattern is a special concern. The whole group of each clachan needs to be protected to conserve the settlement properly, but only one cottage was proposed for the RPS. These clachans are a rare and special piece of social history and heritage, and should be given much greater recognition and valued for their social and architectural heritage. Suggest a wide ranging list of examples for protection.</p>	<p>0158</p>		<p>Manager's Response A considerable body of work was carried out following the completion of the National Inventory of Architectural Heritage survey of the County in 2002 in assessing the recommended structures for inclusion on the Record of Protected Structures by the Minister for Environment, Heritage and Local Government for the County Development Plan 2004-2010. A number of cottages in the Glenasmole Area which retain vernacular features of the area and a sample of rural cottages have been chosen as the best representation of the vernacular dwellings of this area. Having considered the further suggestions for additions to the Record of Protected Structures across the County in areas such as Corkagh, Clondalkin, Glenasmole, Bohernabreena, Ballinascorney, Palmerstown, Templeogue, Firhouse, Greenhills, Kiltipper, among others it is considered at this time that no additional structures will be added to the Record of Protected Structures.</p> <p>Manager's Recommendation No change recommended.</p>
<p>Brittas community and mass centre be designated a protected structure</p>	<p>0281</p>		<p>Manager's Response A considerable body of work was carried out following the completion of the National Inventory of Architectural Heritage survey of the County in 2002 in assessing the recommended</p>

			<p>structures for inclusion on the Record of Protected Structures by the Minister for Environment, Heritage and Local Government for the County Development Plan 2004-2010. Having considered suggestions for addition to the Record of Protected Structures at Brittas and have regard to the fact that this structure was not identified in the NIAH survey it is considered at this time that no additional structures will be added to the Record of Protected Structures.</p> <p>Manager's Recommendation No change recommended.</p>
St. Cuthbert's Park Deansrath to be deemed a protected structure and that lighting be installed	0281		<p>Manager's Response This site is included in the Record of Protected Structures under reference 133- Kilmahuddrick- Stone Church (Ruin), Graveyard & Moated Site Possible (RM). The issue of lighting such a site would have to be examined in detail in order to consider the impacts on biodiversity or habitats in conjunction with the Parks and Landscape Services.</p> <p>Manager's Recommendation No change recommended.</p>
Requests that the Protected Structure status of the Poitin Stil be revisited as it is a relatively new structure rebuilt in recent years and has no specific interest.	0015		<p>Manager's Response An Poitin Stil is identified in the National Inventory of Architectural Heritage as a structure of Regional Rating and of Architectural, Archaeological and Social Importance. The structure is described as a Detached three-bay two-storey building, c.1700,.The restaurant is one of the oldest surviving structures in the village and, though quite altered and refurbished, remains a valuable element of the local history, long in use as a public house. It is not considered reasonable or necessary to consider this structure for de-listing.</p> <p>Manager's Recommendation No change recommended.</p>
Request that No. 245 Templeogue Road, an Art Deco	0046		<p>Manager's Response</p>

<p>style dwelling, not be included on the list of Protected Structures.</p>			<p>A planning authority is obliged to include in the Record of Protected Structures every structure which, in its opinion, is of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest. Although the setting of No. 245 Templeogue Road has changed over the years it is considered that this structure is of architectural, artistic, historical and social interest. No. 245 is an Art Deco style/designed house and is the only one of its kind in South Dublin County so is therefore unique in terms of architectural style. Its historical and social association with German espionage during the Second World War provides other special interests associated with this structure namely historical and social. We appreciate and note the owners concerns however in relation to the continued maintenance and upkeep of the structure under the Planning and Development Act 2000 the conservation grant scheme for Protected Structures was introduced in order to provide financial assistance to owners of Protected Structures. The grant scheme for Protected Structures is run on an annual basis and is financed by the Department of the Environment, Heritage and Local Government.</p> <p>Manager's Recommendation No change recommended to this proposed addition to the RPS list.</p>
<p>Protected Structure – Map Ref. 157 – Ecclesiastical Enclosure and Holy Well Is it imperative to include the laneway running alongside the enclosure?</p>	<p>0107</p>		<p>Manager's Response Subject RPS Ref. 157 which relates to Ecclesiastical Enclosure and Holy Well, the site is also a Recorded Monument under Ref. DU021-001 as detailed in the Record of Monuments and Places. It should be noted that this site is protected under the Planning and Development Act 2000 and the National Monuments (Amendment) Act 1994. The area marked on and shown on the Record of Monuments and Places map covers the extent of the laneway in question, therefore it is considered that no amendments are required as with all Recorded Monuments there is a buffer zone included as the Recorded Monuments identified on the RMP are indicative in some instances where structures are below ground.</p>

			<p>Manager's Recommendation No change recommended.</p>
Propose the removal of the mews building, associated with Rockbrook House, from the Record of Protected Structures.	0132 0231		<p>Manager's Response According to the Architectural Heritage Protection Guidelines for Planning Authorities (Department of Environment Heritage and Local Government, 2004) deletions from the Record of Protected Structures where the planning authority considers that the protection of a structure, or part of a structure, is no longer warranted will generally take place only when the structure has entirely lost its special interest value through major accident or where new information has come to light which proves that the special interest value was mistakenly attributed.</p> <p>It is considered that although the works carried out to date have negatively impacted upon the character of the structure the mews building has not entirely lost its special interest values as identified by the National Inventory of Architectural Heritage including architectural, artistic and technical interest and it would still warrant a regional rating. The mews building makes a significant contribution to the setting of the main house and provides a visual record of the original layout of the grounds and uses associated with the site.</p> <p>It is therefore considered that the mews building should not be deleted from the Record of Protected Structures.</p> <p>Manager's Recommendation No change recommended.</p>
Request that a preservation order be put on the mass/community centre; that a survey of all historical and archaeological sites in the Brittas area be carried out and preserved and that the Council construct a 'bretasche' in the grounds of the community centre.	0071		<p>Manager's Response While it is acknowledged that it is believed that such a Bretesche would have been used in the 10th Century in Brittas- it is considered inappropriate conservation practice to falsify a historical monument in this manner. The Heritage Service sets out under the Record of Monuments and Places all sites and features of interest in the County and these are recorded in Schedule 1 of</p>

			<p>the Draft Plan and Schedule 2 of the Draft plan sets out the Record of Protected Structures which includes structures recommended following a comprehensive survey of the County carried out under the National Inventory of Architectural Heritage in 2002. This record was reviewed as part of the Draft Plan process. The Draft Heritage Plan proposes to initiate a survey of all protected sites and monuments in the County and a Buildings at Risk Audit under which buildings in this area could be included.</p> <p>Manager's Recommendation No change recommended.</p>
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6.9.3 Schedule 3 Definition of Use Classes

Issue	Sub No	Manager's Response and Recommendations
Schedule 3 – Definitions of Class Uses		
<p>Requests that the definition of Offices be re-defined in accordance with classes of use contained in the Planning and Development Regulations, 2001 (as amended).</p> <p>Request that Shop-Neighbourhood be provided with a definition, including scale, within Definitions and Use Classes. Request clarification regarding Local Centres and Neighbourhood Centres as a 'Shop Major Sales Outlet/Supermarket' is not permitted under this zoning.</p>	<p>0169</p> <p>0250</p>	<p>Manager's Response</p> <p>The definition of offices contained within Schedule 3 is based on the definition as outlined in Part 4 of the Planning and Development Regulations 2001.</p> <p>The definition for Shop-Neighbourhood, which is contained in the current plan, will be generally carried over into the 2010-2016 Development Plan.</p> <p>Manager's Recommendation</p> <p>The following definition should be added to Schedule 3: "This category includes smaller shops giving a localised service in a range of retail trades or businesses such as sweets, groceries, tobacconist, newspapers, hairdresser, undertaker, ticket agency, dry cleaning and laundry depots and designed to cater for normal 'neighbourhood requirements'.</p>

6.9.4 Schedule 4 Casement Aerodrome, Baldonnell

Issue	Sub No	Manager's Response and Recommendation
Schedule 5		
<p>The main alteration to Air Safety Policy is the introduction of Public Safety Zones within the existing 'red zones', following the <i>'Review of Policy at Casement Aerodrome, Baldonnell, Co. Dublin'</i> (January 2009). No development whatsoever is permitted within the Public Safety Zones. However, where previously no development would have been allowed within the 'red zones', following the revision, some development is permissible whereby the development could not reasonably expect to increase the number of people working or congregating in or at the property such as the extension of an existing dwelling or a change of building use. However new developments with a high intensity of use would continue to be prohibited. Height restrictions would continue to apply to developments in the environs of the Aerodrome.</p>	0218	<p>Manager's Response Development Plan policy, Schedule 4, and the Index map require to be amended to reflect changes introduced by the Review document. The Index map will be revised following receipt of information from the Department of Defence.</p> <p>Manager's Recommendation Schedule 4, page 264, third paragraph: Delete the following text: <i>'The Department of Defence requires that no new building or developments including carparks, workshops, haybarns, etc. be permitted on lands lying under the runway approach surfaces at Casement Aerodrome, for a distance of 1,350 metres (4,430 feet) outwards from the future thresholds of the runways. However, Council policy reduces this distance for runway 05 (Rathcoole end and runway 23 (Corkagh Park end) to that shown on Development Plan maps i.e. 1,100 metres (3,610 feet).'</i></p> <p>Insert the following replacement text: <i>'In the document 'Review of Policy at Casement Aerodrome, Baldonnell, Co. Dublin' (January 2009), Public Safety Zones have been introduced within the existing 'red zones'. No development whatsoever is permitted within the Public Safety Zones. However, within the 'red zones', some development is permissible whereby the development could not reasonably expect to increase the number of people working or congregating in or at the property. This may include development such as the extension of an existing dwelling or a change of building use. New developments with a high intensity of use would continue to be prohibited and height restrictions would continue to apply to developments in the environs of the Aerodrome. However, Council policy reduces the distance within which no development is allowed on lands lying under the runway approach surfaces, for runway 05 (Rathcoole end) and</i></p>

	<p><i>runway 23 (Corkagh Park end), to that shown on Development Plan maps i.e. 1,100 metres (3,610 feet)'.</i></p> <p>NOTE: Detailed information is required from the Department of Defence in order to establish if the distance referred to above is within or outside the Public Safety Zone this will be confirmed prior to any meeting of the Council'.</p> <p>Schedule 4, page 265, fifth paragraph: Delete the following text: <i>'For that reason, it is policy that no new buildings or developments including workshops, haybarns, etc. be permitted on lands lying under the runway approach surfaces at Casement Aerodrome, for a distance of 1,350 metres (4,430) feet outwards from the future thresholds of runways 11/29 and 1,100 metres (3,610 feet) from runways 05/23. These approach areas are shown on the Development Plan Maps (Please see Explanatory Note to this Schedule)'.</i></p> <p>Insert the following replacement text: <i>'In the document 'Review of Policy at Casement Aerodrome, Baldonnell, Co. Dublin' (January 2009), Public Safety Zones have been introduced within the existing 'red zones'. No development whatsoever is permitted within the Public Safety Zones. However, within the 'red zones', some development is permissible whereby the development could not reasonably expect to increase the number of people working or congregating in or at the property. This may include development such as the extension of an existing dwelling or a change of building use. However new developments with a high intensity of use would continue to be prohibited. Height restrictions would continue to apply to developments in the environs of the Aerodrome.'</i></p>
<p>Paragraph 1, pg 265 states <i>'runway 23/05 is a Code 3 visual approach runway, with provision being made...'</i> This statement is incorrect. Runway 23 is a Code 3 instrument runway and has two instrument approaches associated with it. It should be noted also that Boeing 737 type aircraft have operated to Runway 23, although the normal</p>	<p>Manager's Response The Department of Defence has identified an inaccuracy which requires to be corrected.</p> <p>Manager's Recommendation Paragraph 1, Page 265 – delete the following text: <i>'...and runway 05/23 is a Code 3 visual approach runway, with provision being made for possible</i></p>

<p>preference would be for one of the longer runways.</p>		<p><i>upgrading to instrument status'</i> and replace with the following text: <i>'Runway 23 is a Code 3 instrument runway and has two instrument approaches associated with it'.</i></p>
<p>Paragraph 2, pg 265: The datum for the Inner Horizontal Surface is the threshold altitude of Runway 11. This is consistent with ICAO Annex 14 and has been historically applied. The Inner Horizontal Surface altitude of 131.6 is referenced to this datum, not the aerodrome datum as stated in this paragraph. No statement of the location of the origin and the radius of the Inner Zone is given.</p>		<p>Manager's Response The Department of Defence has identified an inaccuracy which requires to be corrected.</p> <p>Manager's Recommendation Paragraph 2, pg265, amend 5th sentence to read as follows: <i>'The inner horizontal surface is an obstacle limitation surface extending to 4km (in all directions) from the centreline of the runway (or runway strip) at an elevation of 45m above the threshold altitude of Runway 11'.</i></p>
<p>Paragraph 3, page 266. It is suggested that the last line should read <i>'which can only be identified by the Air Corps Communications and Information Service'</i> instead of <i>'which can only be identified by the aerodrome Air Traffic Control Service'</i>. AC CIS is responsible for the maintenance and certification of electronic equipment and nav aids</p>		<p>Manager's Response The Department of Defence has suggested an amendment for the purposes of accuracy.</p> <p>Manager's Recommendation Paragraph 3, Page 266; amend last line to read <i>'...which can only be identified by the Air Corps Communications and Information Service'</i>.</p>
<p>Paragraph 5, page 266. It is proposed that the following text change be made <i>'The County Council shall also make known the locations of their own proposed dumps'</i>.</p>		<p>Manager's Response Having regard to the aviation safety implications of the issue in question (i.e. the risk of birdstrike), it is considered that a proposed amendment is justified. However, the term <i>'landfill and civic amenity facilities'</i> is more appropriate than the suggested term <i>'dumps'</i>.</p> <p>Manager's Recommendation Paragraph 5, page 266; replace <i>'should'</i> with <i>'shall'</i> so that sentence reads <i>'The County Council shall also make known the locations of any proposed landfill or civic amenity facilities'</i>.</p>

<p>Paragraph 8, page 266. It is proposed that the following text change be made <i>'the local planning authority shall consult the Department of Defence about any proposal to build a new road</i></p>	<p>Manager's Response The amendment suggested by the Department of Defence would better reflect the priority that would be given by the Council to consultation with the Department regarding road proposals in the vicinity of runway approaches. Having regard to the aviation safety implications of the issue in question, it is considered that the proposed amendment is justified.</p> <p>Manager's Recommendation Paragraph 8, page 266; replace 'should' with 'shall' so that sentence reads <i>'The local Planning Authority shall consult the Department of Defence about any proposal to build a new road...'</i></p>
<p>Suggest that the following penultimate paragraph be inserted at p267 <i>'The Department of Defence shall be consulted on any proposed development, which by its nature, is likely to increase air traffic in the vicinity of Casement Aerodrome or affect the safety, efficiency or regularity of operations at Casement Aerodrome'</i>.</p>	<p>Manager's Response This general requirement to consult the Department of Defence on proposed developments likely to increase air traffic in the vicinity of the Aerodrome, is justified on the basis of aviation safety.</p> <p>Manager's Recommendation Insert the following before the last paragraph on page 267: <i>'The Department of Defence shall be consulted on any proposed development, which by its nature, is likely to increase air traffic in the vicinity of Casement Aerodrome or affect the safety, efficiency or regularity of operations at Casement Aerodrome'</i>.</p>
<p>In relation to general developments within the vicinity of Casement Aerodrome, the Department would like to point out that the issue of mobile cranes can pose a serious threat. The Department would request that the use of mobile cranes should be notified in advance to Air Corps Authorities.</p> <p>Suggest new paragraph 4 be inserted at p267 <i>'Temporary structures, including mobile cranes which are likely to penetrate the ICAO surfaces</i></p>	<p>Manager's Response The threat that could arise from the use of mobile cranes is acknowledged. However, cranes associated with construction work would constitute exempted development that would fall into Class 16 of the Planning Regulations, 2001. As such, no planning permission would be required.</p> <p>In unusual cases, it might be possible for cranes associated with an event such as a long-stay fairground, to require planning permission. In these cases, the usual requirement to consult with the Department of Defence would apply.</p>

<p><i>established at Casement must be notified to and meet any requirements set down by Department of Defence. Where SDCC grants planning permissions to developments underlying such surfaces, it shall require as a condition that the applicant notify the DoD of plans to erect cranes likely to penetrate the applicable ICAO surfaces and meet any requirements set down by the DoD'.</i></p>		<p>Notwithstanding the foregoing, it would be prudent in the interests of aviation safety, to alert applicants in grants of permission for developments underlying ICAO surfaces that would be likely to require mobile cranes during their construction period, as requested by the Department of Defence. It is considered that the most appropriate manner in which to do this would be by means of the attachment of a note to the grant of permission.</p> <p>Manager's Recommendation Insert new paragraph 4, Page 267, as follows: <i>'Temporary structures, including mobile cranes which are likely to penetrate the ICAO surfaces established at Casement must be notified to and meet any requirements set down by the Department of Defence. Where the Council grants planning permissions to developments underlying such surfaces, it shall attach a note requiring that the applicant notify the Department of Defence of plans to erect cranes likely to penetrate the applicable ICAO surfaces and meet any requirements set down by the Department of Defence'.</i></p>
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6.9.5 Schedule 5 Weston Aerodrome Lucan

Issue	Sub No	Manager's Response and Recommendation
Schedule 5		
<p>It is requested that the description and mapping, provided by Weston Executive Aerodrome, referring to the existing airspace safeguarding area controlled by IAA, be incorporated into the new County Development Plan as part of updating Schedule 5.</p>	0241	<p>Manager's Response On behalf of Weston Executive Airport, amendments are proposed to Schedule 5 in order to update the content. The revisions that are being recommended at present will be the subject of further scrutiny by the Council's aviation consultant. Should further changes be necessary, these will be carried out by way of Manager's amendments to be introduced at a later date before adoption of the Plan.</p> <p>Manager's Recommendation Schedule 5: Delete first paragraph and insert the following replacement text: <i>'This safeguarding policy must be read in conjunction with Drawing 'Safeguarding Map for Weston Aerodrome' (to a scale of 1/10560) prepared by GPS Surveying Ltd. of Newmarket House, Co. Cork, dated 10 January 2003. This aerodrome safeguarding map has been lodged by Weston Aerodrome with South Dublin County Council in pursuance of a direction issued by the Irish Aviation Authority (NR T.02 Issue 4 Date 02.09.04 – Aerodrome Safeguarding Maps) in [pursuance of Articles 8 and 23 of the Irish Aviation Authority (Aerodromes and Visual Aids) Order, 2000, (S.I. No. 334 of 2000). Details from this drawing are reproduced on the Development Plan Index Map'.</i></p> <p>Schedule 5: 'NOTE' – Delete text 'drawing no. EDAX 9702/CO9' and insert replacement text as follows: 'Drawing 'Safeguarding Map for Weston Aerodrome' dated 10 January 2003'.</p> <p>Schedule 5: In section headed 'Noise', delete text 'Drawing No. EDAX 9702/CO9' and insert replacement text 'Drawing 'Safeguarding Map for Weston Aerodrome' dated 10 January 2003'.</p>

6.10 Appendix 5 - House Extension Guidelines

Issue	Sub No	Manager's Response and Recommendations
Welcome House Extension Design Guide, and suggest a number of changes, and that it be widely advertised	Draft0158	<p>Manager's Response Noted</p> <p>Manager's Recommendation No change</p>

6.11 Zoning Requests and Land Use Issues

Map 1

Map 2

Map 3

Map 4

Map 5

Map 6

Map 7

General Land Use Zoning Issues

6.11.1 MAP 1

ZONING REQUESTS

Land Use Zoning Requests in relation to Enterprise and Employment						
Sub. No.	Location Description	Area(ha)	Map	Existing Zoning	Proposed Zoning	Manager's Response & Recommendation
0126	Beatties Field, Adamstown	14.91ha	1	Objective B Agriculture	E and A Residential	<p>Manager's Response Submission requests the rezoning of lands south of Adamstown known as 'Beatties Field' The rezoning of the northern portion of the land from Objective B to Objective E and the rezoning of the southern section of the site from zoning objective B to objective A.</p> <p>A substantial amount of industrial and residential land has been zoned in the west of the County and it is considered that this would be sufficient to meet the needs of the County during the development plan period.</p> <p>Any new residential zoned land would undermine the policies and objectives of the SDZ schemes at Adamstown and Clonburris.</p> <p>LZO 3 Rail Corridor- Framework notes that a detailed framework plan for the identification of future development along the rail corridor from the city boundary to Adamstown including lands south of the Nangor road extension. This framework plan will consider future economic and enterprise, commercial, residential and amenity development. This site may be considered as part of the implementation of LZ03.</p> <p>Manager's Recommendation No change is recommended.</p>
0145	Cooldrinagh, Lucan		1	GB Green Belt	EP3 Enterprise Priority Three	<p>Manager's Response Submission requested rezoning the land from Green Belt to EP3 Enterprise Priority Three Zoned Lands and residential.</p>

					Zoned Lands and A1 Residential	<p>A substantial amount of industrial and residential land has been zoned in the west of the County and at Adamstown and Clonburris and it is believed that this would be sufficient to meet the needs of the County during the development plan period.</p> <p>It is therefore not considered appropriate to rezone the land.</p> <p>Manager's Recommendation No change is recommended.</p>
Land Use Zoning Requests in relation to Residential						
Sub. No.	Location Description	Area(ha)	Map	Existing Zoning	Proposed Zoning	Manager's Response & Recommendation
0001	Somerton House	1.74 ha	1		SDZ	<p>Manager's Response The lands are in the Adamstown SDZ, but not subject to the Planning Scheme and occupy a key position as part of the wider Adamstown network of open space and historic structures, and it is considered that they should remain zoned as part of this open space network. Furthermore, given the existing availability and location of zoned residential land coupled with the widespread opportunity for mixed-use and infill development within the County, it is considered that no expansion of residentially zoned land is required at this time.</p> <p>Manager's Recommendation The lands be zoned 'F' Open Space- reflecting the existing zoning on site.</p>
0037	Esker House, Lucan	1.63	1	F Open Space	A Residential	<p>Manager's Response Given the existing availability and location of zoned residential land coupled with the widespread opportunity for mixed-use and infill development within the County, it is considered that no expansion of residentially zoned land is required at this time.</p> <p>Manager's Recommendation No change recommended.</p>
0198	Finnstown	10.2 ha	1	F Open	A Residential	Manager's Response

	House, Lucan			Space		Given the existing availability and location of zoned residential land coupled with the widespread opportunity for mixed-use and infill development within the County, it is considered that no expansion of residentially zoned land is required at this time. Manager's Recommendation No change recommended.
0220	Finnstown House, Lucan	7.76 ha	1	F Open Space	A Residential	Manager's Response Given the existing availability and location of zoned residential land coupled with the widespread opportunity for mixed-use and infill development within the County, it is considered that no expansion of residentially zoned land is required at this time. Manager's Recommendation No change recommended.
Zoning Requests received in relation to Town, District and Local Centres						
0253	Foxhunter, Lucan	2.31	1	A Residential	LC	Manager's Response It is not considered appropriate to rezone the land for Local Centre purposes. The site is located off the N4 with limited accessibility and would be unsuitable for any additional intensification of use on the site and certainly would not be suitable for Local Centre purposes. Furthermore, it is not considered warranted at this time to zone any more land for Local Centre uses. Manager's Recommendation No change recommended.
Land Use Zoning Request in relation to Landscape, Natural Heritage and Biodiversity						
Sub. No.	Location Description	Area(ha)	Map	Existing Zoning	Proposed Zoning	Manager's Response & Recommendation
0105 0144	Cooldrinagh		1	'G' High Amenity	'GB' Green Belt	Manager's Response The proposed park and ride site as stated in the submission is zoned 'G' high amenity and not 'B' agriculture as set out in the submission. The lands are zoned to protect and improve high amenity, and it is therefore not considered appropriate or necessary to rezone these lands.

						Manager's Recommendation No change recommended.
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LAND USE ZONING ISSUES

Land Use Zoning Issues in relation to Enterprise and Employment			
Sub. No	Issue	Map	Manager's Response & Recommendation
0131	Requests that all lands west of the R120 be rezoned from EP2 and EP3 to B until the next development plan review. This is particularly important given the long-term approach to the roads being taken in this development plan.	1	<p>Manager's Response</p> <p>The rezoning of the land for EP3 uses to the west of the County is generally in accordance with the objectives and policies set out in the Development Plan. The lands are required in order to allow for the relocation of space hungry, low employee type uses from lands served by high quality public transport which is proximate to existing or future town centre and mixed use areas. This will allow for more sustainable intensification of brownfield lands.</p> <p>Development on the EP3 lands will be guided by policies contained within the Draft Plan regarding the identification and retention of natural features such as treelines, archaeological sites, hedgerows of importance, topographical features, rivers and riparian zones in order to reduce the impact of development to a far greater extent than has been seen heretofore.</p> <p>The rezoning of the lands adjacent to Kilcarberry/Profile Park is to facilitate the sustainable development of EP1 lands in Tallaght and Naas Road in line with the Draft Development Plan. This will require the relocation of land intensive uses from sites which are in proximity to high quality public transport, to sites adjacent to the road network, thereby allowing for employee intensive uses to be located on the vacated brownfield sites. This will allow for land uses and transport needs to be tied together. Allowing for the development of offices of 1,000sqm on EP3 lands would undermine the preferred development strategy, resulting in large scale office development in unsuitable locations. Development on the EP3 lands at Kilmactalway, Milltown and Commons, will require a Framework Plan (SLO36). This should ensure biodiversity and environmental constraints are taken into account, as well as providing for sustainable development of the lands on a phased basis.</p> <p>Manager's Recommendation No change recommended</p>
0202	Objects to the additional zoning of Enterprise and Employment land at Milltown, Kilmactalway and Clutterland.	1	
0121	PROFILE PARK: Note a number of issues pertaining to the particular lands proposed to be zoned, issues include accessibility, Urban sprawl, impact on existing zoned land.	1	

Land Use Zoning Issues in relation to Town District and Local Centres			
Sub. No	Issue	Map	Manager's Response & Recommendation
0044	Concerned that the zoning of land, which is in their ownership, and which is contained within the Clonburris LAP has been airbrushed from the Plan.	1	<p>Manager's Response</p> <p>The Clonburris Local Area Plan, 2008 was adopted by South Dublin County Council in April 2008. Extensive public consultation was undertaken by South Dublin County Council during all phases of the Clonburris Local Area Plan preparation (2006 and 2008).</p> <p>There is no statutory obligation under the terms of Section 20 of the Planning and Development Act, 2000 (as amended) to notify landowners within a plan area prior to the preparation of a Local Area Plan. Notwithstanding this, South Dublin County Council made every effort to consult with known landowners and with the wider public. Consultation significantly exceeded statutory requirements and included stakeholder and resident workshops, publication of newspaper notices in a range of local and national newspapers, issue of flyers to households in the area (up to 30,000 in total), issue of press releases and press packs, and public displays and exhibitions at Local Authority offices and Shopping Centres in the area.</p> <p>There was a significant public response to the public consultation process at all stages and in particular in respect of the proposed Local Area Plan, published in August 2007, both formally and in terms of public campaigns and media coverage. In total, 907 valid written submissions or observations were received from a variety of individuals and groups including local residents, landowners, statutory organisations, elected members and community interest groups, during the public consultation period.</p> <p>The Clonburris Local Area Plan, 2008 identifies a Neighbourhood Park at Lynches lane, which incorporates the property outlined as Kishoge Cottage in submission no. 0044. It is proposed to amend the zoning of this area from Zoning Objective A1 – “To provide for new residential communities in accordance with approved plans” to objective F “To preserve and provide for Open Space and Recreational Amenities”. This is considered appropriate in the context of the approved Local Area Plan and no amendment is proposed.</p> <p>Manager's Recommendation No Change recommended</p>

0064	Request that St Helen's House and grounds on Tandy's Lane be removed from the Adamstown SDZ zoning as its inclusion appears to have been made in error.	1	<p>Manager's Response The subject lands are in the Adamstown SDZ, but not subject to the Planning Scheme, and occupy a key position as part of the wider Adamstown network of open space and historic structures, and it is considered that they should remain zoned as part of this open space network.</p> <p>Manager's Recommendation The lands be zoned 'F' Open space- reflecting the current zoning on the site.</p>
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6.11.2 MAP 2

ZONING REQUESTS

Land Use Zoning Requests in Relation to Enterprise and Employment						
Sub. No.	Location Description	Area(ha)	Map	Existing Zoning	Proposed Zoning	Manager's Response & Recommendation
0012	Lands at Newlands Cross	7.41 Ha	2	'GB' Green Belt	LC/DC Local Centre/District Centre	<p>Manager's Response The submission requested rezoning of green belt lands at Newlands Cross and Naas Road for mixed use and to facilitate Gateway/Landmark type building at Naas Road.</p> <p>The site is currently zoned green belt and is designated as amenity open space in the Draft Naas Road Framework. Given the current and proposed land use within the Naas Road Masterplan area and the designated and historical green belt use on the lands as a strategic separation between Tallaght and Clondalkin, it is not considered appropriate to rezone the land.</p> <p>Manager's Recommendation No change is recommended.</p>
0109	Lands at Corkagh, Naas Road, D22		2	F Open Space	EP2 Enterprise Priority Two Zoned Lands	<p>Manager's Response The submission requested the lands be rezoned from Objective F to Objective EP2 Enterprise Priority Two Zoned Lands.</p> <p>It is considered that a substantial amount of industrial and enterprise land has been zoned within the County and it is considered that this would be sufficient to meet the needs of industry, enterprise and employment during the development plan period.</p> <p>Manager's Recommendation No change is recommended.</p>

0150	Naas Road	0.3ha	2	'A' residential	Mixed use	<p>Manager's Response The site is located close to the junction of the Naas Road and the Fonthill Road in a predominantly residential area. It is removed from the existing local centre and other industrial areas. The draft Naas Road Development Framework Plan has examined the area and has not proposed to change the use of the site. The proposed rezoning would not be in keeping with existing land use in the area.</p> <p>Manager's Recommendation No change recommended.</p>
0163	Lands along Naas Road	3.2ha	2	EP2 Enterprise Priority Two Zoned Lands	EP1 Enterprise Priority One Zoned Lands	<p>Manager's Response The submission requested rezoning of the subject lands from EP2 Enterprise Priority Two Zoned Lands to EP1 Enterprise Priority One Zoned Lands A substantial amount of EP1 Enterprise Priority One Zoned Lands have been zoned within the County, at locations situated along significant public transport routes, and it is considered that this would be sufficient to meet the needs of industry, enterprise and employment during the development plan period.</p> <p>Although the site is located along the Naas Road, it is removed from existing centres and is not well served by public transport. As a result of the above it is not considered appropriate to rezone the subject lands.</p> <p>Manager's Recommendation No change recommended</p>
0165	Eircom, Clondalkin Industrial Estate	14ha	2	EP2 Enterprise Priority Two Zoned Lands	EP1 Enterprise Priority One Zoned Lands	<p>Manager's Response The submission requested rezoning of the subject lands from EP2 Enterprise Priority Two Zoned Lands to EP1 Enterprise Priority One Zoned Lands.</p> <p>A substantial amount of EP1 Enterprise Priority One Zoned lands have</p>

						<p>been zoned within the County, at locations situated along significant public transport routes, and it is considered that this would be sufficient to meet the needs of industry, enterprise and employment during the development plan period.</p> <p>Although the site is at a Strategic location close to the N7 and M50, there are access issues and it is not well served by public transport. As a result of the above it is not considered appropriate to rezone the subject lands.</p> <p>LZO 3 Rail Corridor- Framework provides for a detailed framework plan for the identification of future development along the rail corridor from the city boundary to Adamstown including lands south of the Nangor road extension. This framework plan will consider future economic and enterprise, commercial, residential and amenity development. This site may be considered as part of the implementation of LZ03.</p> <p>Manager's Recommendation No change is recommended.</p>
0191	Lands situated immediately to the east of St. Brigid's Cottages north of the Naas Road and west and south of Monastery Road.	Stated as 3.24ha	2	EP2 Enterprise Priority Two Zoned Lands	EP1 Enterprise Priority One Zoned Lands	<p>Manager's Response The County Development Plan 2004-2010 included a Local Zoning Objective 5. N7 Gateway Corridor – Upgrading and Local Zoning Objective 8 – St Brigid's Cottages, Naas Road – mixed use development. These Objectives have been fulfilled through the preparation of the Naas Road Framework which has undergone public consultation. The framework is comprehensive in nature and in the Council's view the LZO has been finalised.</p> <p>It is not considered appropriate to rezone the lands for EP1 purposes given that the lands are well separated from other EP1 lands, town centre lands and are not directly served by fixed rail higher public transport facilities.</p> <p>Manager's Recommendation</p>

						No change recommended.
0205	Fonthill Retail Park	1.14	2	EP2 Enterprise Priority Two Zoned Lands	EP1 Enterprise Priority One Zoned Lands	<p>Manager's Response EP1 areas will promote intensive development around fixed public transport corridors and hubs with the intention of allowing EP2 uses, which reflect the uses in enterprise and employment to flourish in these areas. The Fonthill Retail Park is located between Liffey Valley Town Centre and the Clonburris eco-district centre and the integrity of both these areas could be jeopardised by the building out of the Fonthill Retail Park as a new mixed-use centre. Therefore the rezoning of these lands to EP1 would be contrary to the proper planning and sustainable development of the area, would have a negative impact on the growth of two important centres within the county and would be contrary to the core strategy of the plan.</p> <p>Manager's Recommendation No change recommended.</p>
0206	Ballymount	10.04	2	EP2 Enterprise Priority Two Zoned Lands	EP1 Enterprise Priority One Zoned Lands	<p>Manager's Response A substantial amount of EP1 zoned lands have been zoned within the County, at locations situated along significant public transport routes, and it is considered that this would be sufficient to meet the needs of industry, enterprise and employment during the development plan period. Furthermore, the lands are located within an area which is the subject of the Naas Road Framework. This plan has gone through a public consultation process and has been prepared in accordance with County Policy. It is considered that there is ample EP1 zoned lands within the county and that the land zoning should remain as EP2.</p> <p>Manager's Recommendation No change recommended.</p>
0213 & 0222	Dublin City Sports and Social Club Coldcut Road	10.83ha	2	F Open Space	EP1 Enterprise Priority One Zoned Lands	<p>Manager's Response The site is located along the Coldcut Road and is situated in close proximity to Liffey Valley Town Centre. Liffey Valley Town Centre has been the subject of a LAP which underwent public consultation during its preparation. Liffey Valley Town Centre is in a strong position to</p>

						<p>meet the needs of this part of the county during the LAP and Development Plan periods and further intensification is not required at this time. The proposed rezoning of the land is not considered to be warranted at this time in the absence of public transport improvements and given the existence of the substantial town centre mixed use zoned lands to the north of the site.</p> <p>Manager's Recommendation No change recommended.</p>
Land Use Zoning Requests in Relation to Town District and Local Centres						
Sub. No.	Location Description	Area(ha)	Map	Existing Zoning	Proposed Zoning	Manager's Response & Recommendation
0136	Ballyfermot	0.18	2	EP2 Enterprise Priority Two Zoned Lands	LC Local Centre	<p>Manager's Response It is considered that there is ample Local Centre zoning dispersed throughout the County and within close proximity to the site, such as along Kennelsfort Road and within Palmerstown. It not considered warranted at this time to zone any more land for Local Centre uses.</p> <p>Furthermore it is an objective of the Council that on lands zoned for EP2 purposes to facilitate opportunities for high-end manufacturing, research and development facilities and light industry employment and related uses in industrial areas and business parks.</p> <p>Manager's Recommendation No change recommended.</p>
0106	Clondalkin		2	LC Local Centre	F Open Space	<p>Manager's Response The site is zoned Local Centre, to protect, provide and or improve local centre facilities. It is not considered appropriate to rezone these lands at this time.</p> <p>Manager's Recommendation No change is recommended.</p>

Land Use Zoning Requests in Relation to Landscape, Natural Heritage and Biodiversity.						
Sub. No	Location Description	Area(ha)	Map	Existing Zoning	Proposed Zoning	Manager's Response & Recommendation
0106	Clondalkin		2	LC Local Centre	F Open Space	<p>Manager's Response The site is zoned Local Centre, to protect, provide and or improve local centre facilities. It is not considered appropriate to rezone these lands at this time.</p> <p>Manager's Recommendation No change is recommended.</p>

LAND USE ZONING ISSUES

Land Use zoning issues in relation to Enterprise and Employment			
Sub. No	Issue	Map	Manager's Response & Recommendation
0024 0039	Object to rezoning of lands at Coldcut Road Clondalkin Dublin City Services Sports and Social Club (ref PDS0136)	2	<p>Manager's Response It is not intended to change the zoning on this site.</p> <p>Manager's Recommendation No change recommended</p>
0024	Regarding proposed rezoning of land at Coldcut Road - believes that there is sufficient lands provided for development in the area in the Liffey Valley LAP	2	
0024	With regards to the proposal for the rezoning of lands at the Coldcut Road - If development is allowed, the council should address architectural design, traffic management, overlooking, overshadowing and construction management.	2	
0284	Oppose rezoning of Coldcut Road site.	2	
0028	Request to reconsider effective freezing of IRFU lands at Newlands cross, in light of Metro West-proposed stop located beside lands which have	2	

	<p>development potential within life of the Plan. Draft pays insufficient regard to potential of GB zoned lands at Newlands Cross to contribute to sustainable development by retaining the GB Zoning.</p>		<p>this plan in this general location. Given the work carried out as part of the preparation of the Naas Road framework plan, it is considered that, at this time, no change in zoning at this location would be appropriate.</p> <p>Manager's Recommendation No change recommended</p>
0249	<p>Concern regarding the conflict between the purpose and objective of the existing and Draft Development Plans zonings versus the purpose of the Naas Road Development Framework Draft 2009.</p>	2	<p>Manager's Response The Development Plan has a six year lifetime. Notwithstanding this, it does take a longer view with respect to the future form and location of development within the County. The Council has carried out significant work in forming a view of the appropriate form and scale of development along the Naas road from Newlands Cross to the City Boundary. This work has formed a context for the development plan in this area and it is considered that there is no conflict between the Development Plan and the framework plan given the differing timescales of view.</p> <p>Manager's Recommendation No change recommended</p>

6.11.3 MAP 3

ZONING REQUESTS

Land Use Zoning Requests in Relation to Enterprise and Employment						
Sub. No.	Location Description	Area(ha)	Map	Existing Zoning	Proposed Zoning	Manager's Response & Recommendation
0043	Site located south of main road from Rathcoole to Newcastle, adjacent to Aerodrome Business Park.	0.18ha	3	EP3 Enterprise Priority Three Zoned Lands	Objective B Agriculture	<p>Manager's Response The submission objects to the rezoning of land to Objective 'EP3 Enterprise Priority Three Zoned Lands' adjacent to Aerodrome Business Park roundabout entrance. Given that it is an objective of the Council to build on the existing cluster of economic activity along the outer ring road to Grange Castle, it is considered that the EP3 Enterprise Priority Three zoning of this land is acceptable. Furthermore the lands are located directly adjacent to Casement Aerodrome high security facility. Following consideration by the appropriate State Authorities on the security of this facility, it is required that the restrictive zone be maintained. It is considered appropriate that given the established use in the area that the appropriate zoning is B</p> <p>Manager's Recommendation No change is recommended.</p>
0107	Lands at College Lands/Tay Lane and Peamount.	0.18ha	3	EP3 Enterprise Priority Three Zoned Lands	Objective B Agriculture	<p>Manager's Response The submission objected to the rezoning of agricultural lands at Tay Lane and also at Peamount. It is acknowledged that the valley within which the EP3 zone lies is sensitive, however the land to the</p>

						<p>west of Tay Lane is of far greater sensitivity. The EP3 land is less elevated, and more suited to development. Protection of riparian zones, retention of important treelines and hedgerows will be required, along with a sensitive overall layout to fit development within existing field boundaries and reduce impact on the landscape.</p> <p>Given that it is an objective of the Council to build on the existing cluster of economic activity along the outer ring road to Grange castle, it is considered that the land use zoning is appropriate and no change is recommended.</p> <p>Manager's Recommendation No change is recommended</p>
0119 0247	<p>Lands at Kilbride.</p> <p>The lands are situated within the Department of Defence inner zone and security zone around Casement Aerodrome.</p>	8ha	3	Objective B Agriculture	EP2 Enterprise Priority Two Zoned Lands	<p>Manager's Response</p> <p>The submission requested that the remainder of Profile Park lands at Kilbride be rezoned from "F" to "EP2 Enterprise Priority Two Zoned Lands". The lands are in fact zoned objective B agriculture.</p> <p>The lands are located directly adjacent to Casement Aerodrome high security facility. Following consideration by the appropriate State Authorities on the security of this facility, it is required that the restrictive zone be maintained. It is considered appropriate that given the established use in the area that the appropriate zoning is B</p> <p>Given the sites are within the Department of Defence Inner Zone and its Security Zone around Casement Aerodrome and that there is sufficient land zoned industrial in the County, no change is recommended.</p> <p>Manager's Recommendation</p>

0127	Lands at Baldonnell. The lands are situated within the Department of Defence inner zone around Casement Aerodrome.	1ha	3	Objective B Agriculture	EP2 Enterprise Priority Two Zoned Lands	<p>No change is recommended.</p> <p>Manager's Response The submission requested a limited rezoning of lands at Baldonnell from Objective B to Objective EP2 Enterprise Priority Two Zoned Lands.</p> <p>A substantial amount of industrial and enterprise land has been zoned within the County and it is considered that this would be sufficient to meet the needs of industry, enterprise and employment during the development plan period.</p> <p>Furthermore the lands are located directly adjacent to Casement Aerodrome, high security facility. Following consideration by the appropriate State Authorities on the security of this facility, it is required that the restrictive zone be maintained. It is considered appropriate that given the established use in the area that the appropriate zoning is B</p> <p>Manager's Recommendation No change is recommended.</p>
0128	<p>Adjacent the Naas Road, Baldonnell.</p> <p>The lands are situated within the Department of Defence inner zone around Casement Aerodrome.</p>	9.5ha	3	Objective B Agriculture	EP2 Enterprise Priority Two Zoned Lands	<p>Manager's Response The submission requested the rezoning of lands at Baldonnell from Objective B to Objective EP2 Enterprise Priority Two Zoned Lands.</p> <p>A substantial amount of industrial and enterprise land has been zoned within the County and it is considered that this would be sufficient to meet the needs of industry, enterprise and employment during the development plan period.</p> <p>The Camac River runs through the site. The river is</p>

						<p>extremely polluted, and will take until 2027 to meet the requirements of the Water Framework Directive (WFD). Indicative plans provided with the submissions propose to culvert the river, and show no attempt to retain or improve the existing riparian zone or associated planting along the river. Culverting of the river through the site will be to the further detriment of the river. Additional large scale development proximate to the river may create further difficulties in terms of compliance with the WFD. A recorded monument appears to be located in the north-eastern section of the site. Development of the lands would also undermine the ability of key development areas within the county to reach full and sustainable development potential.</p> <p>Furthermore the lands are located directly adjacent to Casement Aerodrome, high security facility. Following consideration by the appropriate State Authorities on the security of this facility, it is required that the restrictive zone be maintained. It is considered appropriate that given the established use in the area that the appropriate zoning is B</p> <p>Manager's Recommendation No change is recommended.</p>
0129	Lands at Baldonnell		3	Objective B Agriculture	EP2 Enterprise Priority Two Zoned Lands	<p>Manager's Response A substantial amount of industrial and enterprise land has been zoned within the County and it is considered that this would be sufficient to meet the needs of industry, enterprise and employment during the development plan period. The Camac River runs through the site. The river is extremely polluted, and will take until 2027 to meet the requirements of the Water Framework Directive</p>

						<p>(WFD). Indicative plans submitted with the submissions propose to culvert the river, and show no attempt to retain or improve the existing riparian zone or associated planting along the river. Culverting of the river through the site will be to the further detriment of the river. Additional large scale development proximate to the river may create further difficulties in terms of compliance with the WFD. A recorded monument appears to be located in the north-eastern section of the site. Development of the lands would also undermine the ability of key development areas within the county to reach full and sustainable development potential.</p> <p>Further more the lands are located directly adjacent to Casement Aerodrome, high security facility. Following consideration by the appropriate State Authorities on the security of this facility, it is required that the restrictive zone be maintained. It is considered appropriate that given the established use in the area that the appropriate zoning is B</p> <p>Manager's Recommendation No change is recommended.</p>
0146	Hazelhatch Road, Newcastle	7.6ha	3	Objective B Agriculture	EP3 Enterprise Priority Three Zoned Lands	<p>Manager's Response Submission requested rezoning of the subject lands from Objective B agriculture to objective EP3 Enterprise Priority Three Zoned Lands.</p> <p>A substantial amount of industrial and enterprise land has been strategically zoned within the County along the Outer Ring Road or adjacent to existing industrial areas such as Greenogue and Grangecastle and it is considered that this would be sufficient to meet the needs of industry, enterprise and employment during</p>

						<p>the development plan period.</p> <p>The site is not close to any national or primary routes, and is not well served by public transport. It is therefore considered not appropriate to rezone these lands.</p> <p>Manager's Recommendation No change is recommended.</p>
0045 0135	The Whins, Colmanstown, Rathcoole	1.62ha	3	Objective B Agriculture	Enterprise and Employment	<p>Manager's Response It is not considered appropriate to facilitate an enterprise use at this location due to its rural character and nature and having regard to its poor accessibility to the road network. Furthermore, a substantial amount of industrial and enterprise land has been zoned within the County and it is considered that land zoned within the draft development plan would be sufficient to meet the needs of industry, enterprise and employment during the development plan period.</p> <p>Manager's Recommendation No change recommended.</p>
0190 & 0228	Land located within the Department of Defence Inner Zone Limit to the east of Casement Aerodrome and north of the N7	4.15 hectares (11.5acres)	3	Objective 'B'	Enterprise and Employment	<p>Manager's Response The main local challenges facing this County are the maintenance and improvement of a sustainable economic base; the maintenance of existing jobs and the creation of new employment opportunities. One of the core strategic aims of the development plan is the promotion of significant new economic development along defined economic corridors</p>

						<p>based on fixed and developing public transport corridors. The site, although located in close proximity to the N7, is not accessible by public transport and is not located along a public transport corridor. Furthermore, a substantial amount of industrial and enterprise land has been zoned within the County and it is considered that this would be sufficient to meet the needs of industry and enterprise and employment during the development plan period. Having regard to all the above points it is considered that sufficient land has been zoned to accommodate the growth of existing and proposed businesses during the life time of the plan and the site should remain as zoning Objective B 'to protect and improve rural amenity and to provide for the development of agriculture'. It would not be appropriate at this stage to rezone this land.</p> <p>Furthermore the lands are located directly adjacent to Casement Aerodrome, high security facility. Following consideration by the appropriate State Authorities on the security of this facility, it is required that the existing restrictive zone be maintained. It is considered appropriate that given the established use in the area that the appropriate zoning is B.</p> <p>Manager's Recommendation No change recommended.</p>
0193 & 0229	Peamount (straddling both sides of the Peamount Road)	211ha (Stated as 131.2ha)	3	Objective B Agriculture	<p>North Section of land 80.8ha to EP3</p> <p>South Section of land 50.4ha to EP3</p>	<p>Manager's Response The respondent has requested that two substantial parcels of land in the west of the county be rezoned from Zoning Objective B to EP3:</p> <ul style="list-style-type: none"> (Option A) - Request rezoning to the north of

						<p>Peamount of c200 acres of land for EP3 purposes.</p> <ul style="list-style-type: none"> (Option B) - Request rezoning to the south of Peamount of circa 125acreas of land for EP3 purposes. <p>The northern parcel of land envelops the Peamount Hospital complex, while the southern parcel of land is located with the approach area to Casement Aerodrome. It is our view that a substantial amount of industrial and enterprise land has been zoned within the County and it is considered that land zoned within the draft development plan for this purpose would be sufficient to meet the needs of industry, enterprise and employment during the development plan period.</p> <p>Furthermore, the southern parcel of land incorporates a section of land that is located within the approach area to Casement Aerodrome where development is restricted and to zone this land would be contrary to policies and objectives contained within the plan. It is not appropriate at this time to rezone this land. However, elements of the northern section of the site may be considered as part of the implementation of LZO3.</p> <p>Manager's Recommendation No change recommended.</p>
0217	Land at Collegeland	33.04	3	Objective B Agriculture	EP3 Enterprise Priority Three Zoned Lands	<p>Manager's Response</p> <p>A substantial amount of industrial and enterprise land has been zoned within the County and it is considered that this would be sufficient to meet the needs of industry and enterprise and employment</p>

						<p>during the development plan period. Furthermore, the site is located in an area where security zone restrictions exist.</p> <p>Manager's Recommendation No change recommended.</p>
Land Use Zoning Requests in Relation to Residential						
Sub. No.	Location Description	Area(ha)	Map	Existing Zoning	Proposed Zoning	Manager's Response & Recommendation
0006	Site at Fortunestown	0.18	3	GB Green Belt	A/A1 Residential	<p>Manager's Response</p> <p>It is considered that Zoning Objective GB "To preserve a green belt between development areas" as proposed in the Draft Plan is the appropriate zoning for these lands.</p> <p>Furthermore, given the existing availability and location of zoned residential land coupled with the widespread opportunity for mixed-use and infill development within the County, it is considered that no expansion of residentially zoned land is required at this time.</p> <p>Manager's Recommendation No change recommended.</p>
0017	Located close to the proposed new ring road at Rathcoole	2.09	3	B Agriculture	A Residential	<p>Manager's Response</p> <p>Given the existing availability and location of undeveloped zoned residential land in the Rathcoole area and the wider county area, coupled with the widespread opportunity for mixed-use and infill development within the County, it is considered that no expansion of residentially zoned land is required</p>

						at this time. Manager's Recommendation No change recommended.
0050	Lands at Cornpark and Environs, Newcastle	9.8	3	B Agriculture	A1 Residential	Manager's Response Having regard to the availability of undeveloped zoned land within the Newcastle area it is considered that residential development at this location would be contrary to the provisions of the Core Strategy of the Draft Plan which aims to provide a more consolidated and compact urban form for the County. Given the existing availability and location of zoned residential land coupled with the widespread opportunity for mixed-use and infill development within the County, it is considered that no expansion of residentially zoned land is required at this time. Manager's Recommendation No change recommended.
0070	Sweeny's Lands, Peamount Road, Newcastle	28.3	3	B Agriculture	A Residential	Manager's Response Having regard to the availability of undeveloped zoned land within the Newcastle area it is considered that the development of residential development at this location would be contrary to the provisions of the Core Strategy of the Draft Plan which aims to provide a more consolidated and compact urban form for the County. Given the existing availability and location of zoned residential land coupled with the widespread opportunity for mixed-use and infill development within the County, it is considered that no expansion of residentially zoned land is required at this time. Manager's Recommendation No change recommended.

0092	Hazelhatch	2.7	3	B Agriculture	A1 Residential	<p>Manager's Response It is considered that the development of residential development at this location would be contrary to the provisions of the Core Strategy of the Draft Plan which aims to provide a more consolidated and compact urban form for the County. Given the existing availability and location of zoned residential land coupled with the widespread opportunity for mixed-use and infill development within the County, it is considered that no expansion of residentially zoned land is required at this time.</p> <p>Manager's Recommendation No change recommended.</p>
0215	Johnstown Road, Rathcoole	8.4	3	B Agriculture	A1 Residential	<p>Manager's Response Given the existing availability and location of undeveloped zoned residential land in the Rathcoole area and the wider county area, coupled with the widespread opportunity for mixed-use and infill development within the County, it is considered that no expansion of residentially zoned land is required at this time.</p> <p>Manager's Recommendation No change recommended.</p>
0226	Westpark apartments, within the grounds of the Citywest Hotel	2.5	3	F Open Space	A Residential	<p>Manager's Response The current zoning of the subject lands for open space and recreational amenities is considered to be appropriate as part of the wider lands to the west of Garter Lane which have been reserved and developed for recreational and tourism related development. It is considered appropriate that all of these lands continue to be reserved for such purposes. Furthermore, given the existing availability and location of zoned residential land</p>

						<p>coupled with the widespread opportunity for mixed-use and infill development within the County, it is considered that no expansion of residentially zoned land is required at this time.</p> <p>Manager's Recommendation No change recommended.</p>
0242	Tassagart Gardens.	1.6	3	F Open Space	A Residential	<p>Manager's Response The current zoning of the subject lands for open space and recreational amenities is considered to be appropriate as part of the wider lands to the west of Garter Lane which have been reserved and developed for recreational and tourism related development. It is considered appropriate that all of these lands continue to be reserved for such purposes. Furthermore, given the existing availability and location of zoned residential land coupled with the widespread opportunity for mixed-use and infill development within the County, it is considered that no expansion of residentially zoned land is required at this time.</p> <p>Manager's Recommendation No change recommended.</p>
0261	Garters Lane	0.3	3	F Open Space	A Residential	<p>Manager's Response The current zoning of the subject lands for open space and recreational amenities is considered to be appropriate as part of the wider lands to the west of Garter Lane which have been reserved and developed for recreational and tourism related development. It is considered appropriate that all of these lands continue to be reserved for such purposes. Furthermore, given the existing availability and location of zoned residential land coupled with the widespread opportunity for mixed-</p>

						<p>use and infill development within the County, it is considered that no expansion of residentially zoned land is required at this time.</p> <p>Manager's Recommendation No change recommended.</p>
0280	Boherboy Saggart Co Dublin	0.3	3	B Agriculture	A Residential	<p>Manager's Response The current zoning of the subject lands for open space and recreational amenities is considered to be appropriate as part of the wider lands to the west of Garter Lane which have been reserved and developed for recreational and tourism related development. It is considered appropriate that all of these lands continue to be reserved for such purposes. Furthermore, given the existing availability and location of zoned residential land coupled with the widespread opportunity for mixed-use and infill development within the County, it is considered that no expansion of residentially zoned land is required at this time.</p> <p>Manager's Recommendation No change recommended.</p>
Land Use Zoning Requests in Relation to Town, District and Local Centres						
Sub. No.	Location Description	Area(ha)	Map	Existing Zoning	Proposed Zoning	Manager's Response & Recommendation
D0223	Golf Village, Saggart	2.12	3	GB Green Belt	LC Local Centre	<p>Manager's Response It is considered that Zoning Objective GB "To preserve a green belt between development areas" as proposed in the Draft Plan is the appropriate zoning for these lands.</p> <p>Manager's Recommendation No change recommended.</p>

Land Use Zoning Requests in Relation to Landscape, Natural Heritage and Biodiversity						
Sub. No.	Location Description	Area(ha)	Map	Existing Zoning	Proposed Zoning	Manager's Response & Recommendation
0047 0214	Newcastle Village		3	A1 New Residential	F Open space	<p>Manager's Response The site is zoned residential in accordance with the Newcastle LAP, which sets out clear development policy for Newcastle village. The rezoning of this land to open space would be inappropriate, as successful open space requires passive surveillance and overlooking.</p> <p>Manager's Recommendation No change is recommended.</p>
Other Land Use Zoning Requests						
Sub. No.	Location Description	Area(ha)	Map	Existing Zoning	Proposed Zoning	Manager's Response & Recommendation
0009 0022	Newcastle Ballybane	5 acres	3 3	GB Green Belt Industrial	A1 Residential Petrol Station	<p>Manager's Response Both these zoning proposals relate to specific uses i.e. a nursing home on the Newcastle site and a petrol station on the Ballybane site. The zoning matrix sets out the uses that are permitted, open for consideration or not permitted on zoned lands. Proposals for nursing homes and petrol stations will be assessed through the Development Management process and in accordance with the policies and objectives of the plan.</p> <p>Manager's Recommendation No change is recommended.</p>

LAND USE ZONING ISSUES

Land Use Zoning issues in relation to Enterprise and Employment

0063	Request that the rezoning of agricultural lands ("B") to industrial ("EP3") between College Lands and Tay Lane, Rathcoole, on the western side of the N7 be reversed because: of the lack of public transport; its use of irreplaceable agricultural resources; development should be provided on brownfield sites; its impact on habitats and riparian zones; possible flooding; the impact that run-off water may have on brown trout and the River Griffeen; industrial development is incongruous with the rural landscape; its serious impact on the villages of Rathcoole, Newcastle and Lucan and it would be contrary to the Environmental Report.	3	<p>Manager's Response The rezoning of the land for EP3 uses to the west of the County is generally in accordance with the objectives and policies set out in the Development Plan. The lands are required in order to allow for the relocation of space hungry, low employee type uses from lands served by high quality public transport which is proximate to existing or future town centre and mixed use areas. This will allow for more sustainable intensification of brownfield lands. Development on the EP3 lands will be guided by policies contained within the Draft Plan regarding the identification and retention of natural features such as treelines, archaeological sites, hedgerows of importance, topographical features, rivers and riparian zones in order to reduce the impact of development to a far greater extent than has been seen heretofore. It is acknowledged that the valley which the EP3 zone lies within is sensitive; however the land to the west of Tay Lane is of far greater sensitivity. The EP3 land is less elevated, and more suited to development. Protection of riparian zones, retention of important treelines and hedgerows will be required, along with a sensitive overall layout to fit development within existing field boundaries and reducing impact on the landscape.</p> <p>Manager's Recommendation No change recommended</p>
0107	Objection to the rezoning of agricultural lands to industrial at Peamount Road – Peamount Hospital	3	
0107	Objection to the rezoning of agricultural lands ("B") to industrial ("EP3") between College Lands and Tay Lane, Rathcoole	3	
0279	Consider the rezoning of agricultural lands to industrial between Collegeland and Tay Lane totally unacceptable.	3	
0159	Additional Zoned Land is not required as there is an oversupply of land within Ballybane, Grange Castle, Greenogue and Baldonnell area that was zoned in the 2004 plan.	3	
0159	Request the Council to rescind the proposed rezoning of the areas mentioned as Milltown/Kilmactalway and Clutterland.	3	
0260	Request that the c124ha of EP3 zoned lands to the west of Profile Park at Kilmactalway/Clutterland, lands to south of Greenogue and 55 ha of land at Baldonnell Business Park are omitted from the Development	3	

	Plan.		
0240	Objection to the rezoning of agricultural lands to industrial between Collegeland and Tay Lane.	3	
0251	Objects to the zoning of large swathes of additional employment land at Newcastle and Rathcoole at this time given the significant amount of undeveloped employment land remaining from the previous development plan. Large scale zoning will undermine development of existing employment lands in the short term and represents poor planning overall which will lead to continued urban sprawl, 'leapfrogging' of existing zoned lands and poor integration of land use and transport.	3	
0251	Objection to the rezoning of lands at Kilmactalway/Clutterland as it is considered inappropriate for development of road dependent industrial uses given their distance from and lack of direct accessibility to the national road network. If the land is to be rezoned request that a) a phasing restriction on the development of these lands be applied to ensure that the current zoned lands in the industrial arc including those at Profile Park are given priority and b) the development of any additional lands should be subject to a comprehensive Masterplan(s) to detail the extent of roads and services required and to ensure that these are provided upfront.	3	
0043	Objects to the rezoning of land to Zoning Objective 'EP3', in their ownership, located to the south of the main road from Rathcoole to Newcastle and adjacent to Aerodrome Business Park roundabout entrance.	3	<p>Manager's Response</p> <p>The rezoning of the land for EP3 uses to the west of the County is generally in accordance with the objectives and policies set out in the Development Plan. The lands are required in order to allow for the relocation of space hungry, low employee type uses from lands served by high quality public transport which is proximate to existing or future town centre and mixed use areas. This will allow for more sustainable</p>

			<p>intensification of brownfield lands. Development on the EP3 lands will be guided by policies contained within the Draft Plan regarding the identification and retention of natural features such as treelines, archaeological sites, hedgerows of importance, topographical features, rivers and riparian zones in order to reduce the impact of development to a far greater extent than has been seen heretofore.</p> <p>Manager's Recommendation No change recommended</p>
0251	<p>Regards the rezoning of the Profile Park lands, from 'E' to 'EP2', with a restriction on offices over 1,000m² as counterproductive and will conflict with the agreed Masterplan for these lands which provides for commercial offices and corporate headquarters within a mixed use business park setting.</p>	3	<p>Manager's Response The rezoning of the lands adjacent to Kilcarberry/Profile Park is to facilitate the sustainable development of EP1 lands in Tallaght and Naas Road in line with the Draft Development Plan. This will require the relocation of land intensive uses from sites which are in proximity to high quality public transport, to sites adjacent to the road network, thereby allowing for employee intensive uses to be located on the vacated brownfield sites. This will allow for land uses and transport needs to be tied together. Allowing for the development of offices of 1,000sqm on EP3 lands would undermine the preferred development strategy, resulting in large scale office development in unsuitable locations. Development on the EP3 lands at Kilmactalway, Milltown and Commons, will require a Framework Plan (SLO36). This should ensure biodiversity and environmental constraints are taken into account, as well as providing for sustainable development of the lands on a phased basis.</p> <p>Manager's Recommendation No change recommended</p>
0134	<p>Support for the rezoning of lands at Tay Lane for the purposes of Enterprise and Employment and requests that this zoning be retained.</p>	3	<p>Manager's Response Comment noted.</p> <p>Manager's Recommendation No change recommended.</p>
0240	<p>Questions what environmental assessment was carried out with regard to ground water, surface water and flood prevention in relation to the rezoning of land at Collegeland.</p>	3	<p>Manager's Response The submission indicates that development of the EP3 zoned lands to the south of Greenogue will impact on the attenuation ponds put in place to stop the Griffeen Flooding due to development at Greenogue. The submission also states that the Griffeen also flows under the Peamount Road and Loughtown/ Brownstown Road and that these crossing points are susceptible to flood. No flooding study has been</p>

			<p>undertaken for the Griffeen River. Significant sections of the Griffeen River between the N7 and the Grand Canal will be bounded by industrial lands as a result of zoning changes in the Draft Plan. It is considered that prior to any development being undertaken, significant flooding assessment of the EP3 and EP2 zoned lands along the river should be assessed in order to ascertain areas for riparian zones and associated flooding measures without resorting to culverting or channelisation. It is recommended that this will take place as part of any framework plan for the future development these lands in accordance with the 'Planning System and Flood Risk Management Guidelines 2009'.</p> <p>Manager's Recommendation Include additional wording in SLO 36 and 58 to state a requirement for flood risk assessment in accordance with 'Planning System and Flood Risk Management Guidelines 2009'.</p>
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6.11.4 MAP 4

ZONING REQUESTS

Land Use Zoning Requests in Relation to Enterprise and Employment						
Sub. No.	Location Description	Area(ha)	Map	Existing Zoning	Proposed Zoning	Manager's Response & Recommendation
0059	Jacob Factory Site, Belgard Road, Tallaght	7.83 Ha	4	EP2 Enterprise Priority Two Zoned Lands	EP1 Enterprise Priority One Zoned Lands	<p>Manager's Response The submission requested rezoning lands at Jacobs Factory Site, Belgard Road from Objective EP2 Enterprise Priority Two Zoned Lands to EP1 Enterprise Priority One Zoned Lands.</p> <p>The comments of the SEA regarding the premature nature of this zoning change are noted. However, Given that the subject site is situated in an existing industrial area, is adjacent to Tallaght Town Centre and both existing and future public transport nodes, it is considered appropriate to rezone a block of land which includes this site to EP1 Enterprise Priority One Zoned Lands, in the interests of promoting a consolidated, compact and vibrant urban area in Tallaght.</p> <p>Manager's Recommendation It is recommended to rezone the block of land which fronts onto the eastern side of Belgard Road from the TC zoning north to Mayberry Road, no deeper than the width of the 'Jacobs' site.</p>
0168	Greenhills Road, Tallaght	2.31ha	4	EP2 Enterprise Priority Two Zoned Lands	EP1 Enterprise Priority One Zoned Lands	<p>Manager's Response The lands have been zoned EP2 within the County Development Plan to facilitate opportunities for high-end manufacturing, research and development facilities and light industry employment and related uses in industrial areas and business parks. The Tallaght Local Area Plan indicates that the lands are located within an existing industrial area with future key frontages located along the Greenhills Road. It is the intention of the Tallaght LAP to retain light industrial and business activities on this site and does not indicate any significant mixed-uses on the lands. The EP2 zoning would therefore be</p>

						<p>suitable for existing and proposed development on the site and would not be contrary to the Tallaght LAP.</p> <p>Manager's Recommendation No change recommended.</p>
0170 0192	Tallaght: Located off the Belgard Road at Cookstown Road Junction	9.872 ha	4	EP1 Enterprise Priority One Zoned Lands	Change of wording	<p>Manager's Response Change of wording to read as follows: "To facilitate opportunities for intensive employment uses and /or mixed use development based on a principle of street networks and in accordance with approved plans". As set out in the Tallaght LAP</p> <p>The Tallaght Plan indicates phased development for the Belgard Road site and this phasing includes a transport interchange, a landmark building, key frontages, other indicative buildings all to be constructed in conjunction with existing structures/businesses currently on the site. It is the intention of the Tallaght LAP to retain light industrial and business activities on this site to allow for the intensification of businesses around an important transport hub. In this regard the objective 'to facilitate opportunities for intensive employment uses complemented by mixed-use development based on a principle of street networks and in accordance with approved plans' would be in keeping with the spirit of both the development plan and the Tallaght LAP. It is considered that the proposed amendment to the EP1 Objective would facilitate the redevelopment of the lands for mixed-use purposes at the expense of intensive employment uses; this would be contrary to the objectives and policies set out for EP1 zoned lands within the Plan. Furthermore it is our view that the draft development plan would not be contrary to the policies and objectives contained within the Tallaght LAP and therefore should be retained.</p> <p>Manager's Recommendation No change recommended.</p>
0178 0179 0180	All undeveloped land on the Main Road from	None Stated	4			<p>Refer to Manager's Response given in Town, Districts and Local Centres section of the Manager's Report.</p>

	Tallaght Village to the site of Brian S Ryan					
0197	Brownstown	53 ha	4	Objective B Agriculture	EP2 or EP3 Enterprise Priority two and three Zoned Lands	<p>Manager's Response A substantial amount of industrial and enterprise land has been zoned within the county and it is considered that land zoned within the draft development plan would be sufficient to meet the needs of industry, enterprise and employment during the development plan period. Notwithstanding the above the land holding is remote, with poor road access and connections and does not meet with the core strategy of the plan.</p> <p>Manager's Recommendation No change recommended.</p>
0204	Greenhills Road, Tallaght	2.31ha	4	EP2	EP1	<p>Manager's Response The lands have been zoned EP2 within the County Development Plan to facilitate opportunities for high-end manufacturing, research and development facilities and light industry employment and related uses in industrial areas and business parks. The Tallaght Local Area Plan is clear in its intention to locate mixed-use type development close to fixed public transport corridors and contiguous with the existing town centre. The plan indicates that the proposed lands are located within an existing industrial area with no direct links to fixed public transport corridors. It is the intention of the Tallaght LAP to retain light industrial and business activities and the EP2 zoning will reflect this and the existing uses on the site.</p> <p>The EP2 zoning would therefore be suitable for existing and proposed development on the site and would not be contrary to the Tallaght LAP.</p> <p>Manager's Recommendation No change recommended.</p>
0207	Airton Road, Tallaght		4	EP1 Enterprise Priority	EP1 Enterprise Priority One	<p>Manager's Response The submission requested rezoning lands at Airton Road from Objective EP2 Enterprise Priority Two Zoned Lands to EP1 Enterprise Priority One Zoned</p>

				Two Zoned Lands	Zoned Lands	<p>Lands.</p> <p>Given that the subject site is situated in an existing industrial area, is close to Tallaght Town Centre, and the proposed Metro Stop, it is considered acceptable to rezone a block of land which includes this site to EP1 Enterprise Priority One Zoned Lands</p> <p>Manager's Recommendation It is recommended to rezone block of land along Airton Road which fronts onto the Belgard Road to EP1 Enterprise Priority One Zoned Lands.</p>
Land Use Zoning Requests in Relation to Residential						
Sub. No.	Location Description	Area(ha)	Map	Existing Zoning	Proposed Zoning	Manager's Response & Recommendation
0002	lands adjoining Broadfield Manor	0.18	4	B Agriculture	A Residential	<p>Manager's Response Given the existing availability and location of undeveloped zoned residential land in the Rathcoole area and the wider county area, coupled with the widespread opportunity for mixed-use and infill development within the County, it is considered that no expansion of residentially zoned land is required at this time, notwithstanding the limited addition to already zoned land.</p> <p>Manager's Recommendation No change recommended.</p>
0007	Land at Kiltipper Road, Tallaght	0.66	4	G High Amenity	A Residential	<p>Manager's Response The subject lands are located in an area identified as being at risk of flooding, where residential development is permitted in accordance with the Council's rural housing policy. Re-zoning for residential use is not considered appropriate in such cases.</p> <p>Manager's Recommendation No change recommended.</p>
0030	Old Mill Public House, Old Bawn.	0.18	4	G High Amenity	A Residential	<p>Manager's Response It is considered that the current zoning of the subject lands should be retained in the interest of maintaining the integrity of the river valley landscape, particularly as the lands at this location lie within the more rural area to the</p>

						<p>south of Old Bawn bridge. Furthermore, given the existing availability and location of zoned residential land coupled with the widespread opportunity for mixed-use and infill development within the County, it is considered that no expansion of residentially zoned land is required at this time.</p> <p>Manager's Recommendation No change recommended.</p>
0031	Lands at Kingswood, Baldonnell Lower-Lands comprise of Baldonnell House (RPS ref 192)	0.18	4	Enterprise Priority Three Zoned Lands	A Residential	<p>Manager's Response The lands are strategically located along the Outer Ring Road and benefit from good accessibility to the major road network, and are considered most suitable for EP3 land uses. The lands are affected by serious constraints arising from their close proximity to Casement aerodrome and are not well served by public transport, and are not considered to be suitable for residential development. Furthermore, given the existing availability and location of zoned residential land coupled with the widespread opportunity for mixed-use and infill development within the County, it is considered that no expansion of residentially zoned land is required at this time.</p> <p>Manager's Recommendation No change recommended.</p>
0034	Lands located between 56 Forest Close and Forest Lodge, Kingswood Heights	0.08	4	F Open Space	A Residential	<p>Manager's Response Having regard to the limited size and location of the lands it is considered that the lands should more appropriately be zoned Objective 'A' in accordance with the prevailing zoning in the vicinity.</p> <p>Manager's Recommendation Rezone from F Open Space to A Residential.</p>
0035	Lands at Forest Lodge, Forest Close	0.8	4	F Open Space	A Residential	<p>Manager's Response Having regard to the established use of the lands for commercial purposes, and to the previous planning history, it is considered that the lands should more appropriately be zoned Objective 'A' in accordance with the prevailing zoning in the vicinity.</p> <p>Manager's Recommendation</p>

						Rezone from F Open Space to A Residential.
0106	Kingswood Village	0.18	4	F Open Space	A Residential	<p>Manager's Response. It is proposed that the areas currently zoned 'LC' but that have been developed as residential be zoned 'A' – Residential. It is considered that this zoning change reflects the land use type as is established. The remaining lands are recommended to remain as 'LC' zoning.</p> <p>Manager's Recommendation Areas with established residential development to be zoned 'A'</p>
0160	Lands at Kiltipper Road	6.5	4	G High Amenity	A Residential	<p>Manager's Response It is noted that the Environmental Report indicates that these lands are located on a flood plain. No development which would be impacted by flooding, or require flood management measures is recommended on these lands. It is considered that residential development at this location would be contrary to the provisions of the Core Strategy of the Draft Plan which aims to provide a more consolidated and compact urban form for the County. Given the existing availability and location of zoned residential land coupled with the widespread opportunity for mixed-use and infill development within the County, it is considered that no expansion of residentially zoned land is required at this time.</p> <p>Manager's Recommendation No change recommended.</p>
0194	Boherboy Road	3.3	4	B Agriculture	A Residential	<p>Manager's Response It is considered that the development of residential development at this location would be contrary to the provisions of the Core Strategy of the Draft Plan which aims to provide a more consolidated and compact urban form for the County. Given the existing availability and location of zoned residential land coupled with the widespread opportunity for mixed-use and infill development within the County, it is considered that no expansion of residentially zoned land is required at this time.</p> <p>Manager's Recommendation No change recommended.</p>

0201	Fortunestown Way	27.8	4	Enterprise Priority Two Zoned Lands	A1 Residential	<p>Manager's Response These lands are currently zoned EP2. It is a central element of the Development Plan to promote enterprise and employment in appropriate locations. With respect to the expansion of residentially zoned lands it is considered that there is sufficient capacity in the County, but there is not the same capacity to exploit the fixed rail systems for employment and enterprise. This is such an area. The lands are traversed by the Luas extension and it is considered that there is considerable opportunity to encourage a mix of enterprise and employment uses which take advantage of the fixed rail link and build on the evolving form of enterprise and employment development which already exists in this general location. The retention of the EP2 zoning is considered appropriate given the location to the west of the County but in recognition of the particular opportunities that the Luas extension brings to this area it is recommended that an additional LZO be placed on these lands requiring the preparation of a framework plan to promote enterprise and employment uses taking account of new public transport opportunities.</p> <p>Manager's Recommendation It is recommended that an additional LZO be placed on these lands requiring the preparation of a framework plan to promote enterprise and employment uses taking account of new public transport opportunities.</p>
Land Use Zoning Requests in Relation to Town District and Local Centres						
Sub. No.	Location Description	Area(ha)	Map	Existing Zoning	Proposed Zoning	Manager's Response & Recommendation
0030	Old Mill Public House	0.18	4	G High Amenity	LC Local Centre	<p>Manager's Response There is considered to be an ample zoning of Local Centre land dispersed throughout the County and there are at least seven Local Centres located within close proximity of the site; this does not include the close proximity of the Tallaght Town Centre. Furthermore, it is not deemed warranted to encroach further into the Dodder Valley to expand Local Centre facilities where they are not considered to be necessary. Having regard to the above it is not considered that any further Local Centre zoning at this location is required and would be contrary to the proper planning and sustainable development of the area.</p>

						<p>Manager's Recommendation No change recommended.</p>
00141	Lidl Ireland Store, Fortunestown Lane		4	Enterprise and Employment	LC Local Centre	<p>Manager's Response It is considered that there is ample Local Centre zoning dispersed throughout the County and within close proximity to the site in addition to the District Centre located at Fortunestown. It not considered warranted at this time to zone any more land for Local Centre uses.</p> <p>Manager's Recommendation No change recommended.</p>
0142	Greenhills	0.18	4	Enterprise Priority Two Zoned Lands	LC Local Centre	<p>Manager's Response It is considered that there is ample Local Centre zoning dispersed throughout the County.</p> <p>Furthermore, it is an objective of the Council that on lands zoned for EP2 purposes to facilitate opportunities for high-end manufacturing, research and development facilities and light industry employment and related uses in industrial areas and business parks.</p> <p>It not considered warranted at this time to zone any more land for Local Centre uses.</p> <p>Manager's Recommendation No change recommended.</p>
0199	West Oldcourt	32.23	4	A1 Residential	LC Local Centre	<p>Manager's Response The proposed site forms part of the lands contained within the Oldcourt Local Area Plan, which is currently being prepared. The Oldcourt Plan will include locations for Local Centres on the lands.</p> <p>Manager's Recommendation No change recommended.</p>

LAND USE ZONING ISSUES

Land Use Zoning issues in relation to Enterprise and Employment			
0158	Suggest there is no need to rezone more industrial land at this time, Proposed areas, including those at Grange Castle and Kilinarden, should not be rezoned.	4 and 1	<p>Manager's Response The rezoning of the land for EP3 uses to the west of the County is generally in accordance with the objectives and policies set out in the Development Plan. The lands are required in order to allow for the relocation of space hungry, low employee type uses from lands served by high quality public transport which is proximate to existing or future town centre and mixed use areas. This will allow for more sustainable intensification of brownfield lands. Development on the EP3 lands will be guided by policies contained within the Draft Plan regarding the identification and retention of natural features such as treelines, archaeological sites, hedgerows of importance, topographical features, rivers and riparian zones in order to reduce the impact of development to a far greater extent than has been seen heretofore.</p> <p>Manager's Recommendation No change recommended</p>
0102	The Council should ensure that under no circumstances is the Belgard Road property rezoned to a use that will allow profit taking at the expense of Tallaght jobs.	4	<p>Manager's Response The Fruitfield site is in a strategic location along the Belgard Road and close to the proposed metro stop. The site is part of the wider Tallaght Town Centre Area and is earmarked for industrial and mixed commercial use in the Tallaght Town Centre LAP. Given the above the proposed zoning of the site is considered appropriate.</p> <p>Manager's Recommendation No change recommended.</p>
Land Use Zoning issues in relation to Town, District and Local Centres			
0102	Rebalance rezoning be done and that all efforts are made to ensure that the Jacobs site does not become a residential zone and in return to community purposes.	4	<p>Manager's Response The Jacobs site has been zoned for enterprise and employment uses within the Draft Development Plan. Both the Development Plan and the Tallaght Local Area Plan will direct development on the site. The plans will ensure that employment use will be the dominant use on the site.</p>

			<p>Manager's Recommendation It is recommended that these lands be zoned EP1.</p>
0116	The Esso site in Tallaght should be rezoned or be the subject of a land swap to provide for community facilities. (No map included)	4	<p>Manager's Response The Tallaght Local Area Plan will direct all development, including community facilities, within the Tallaght area.</p> <p>Manager's Recommendation No change recommended</p>
Land Use Zoning issues in relation to Landscape, Natural Heritage and Biodiversity			
0139	There should be no change in zoning as was previously attempted in variation requests to allow apartment developments on the lands owned by The Old Mill public house. The development types and scale in this natural amenity should remain high amenity and seek to retain and maximise its potential to develop environmental & recreational activities.	4	<p>Manager's Response It is not intended to change the zoning on this site.</p> <p>Manager's Recommendation No change recommended</p>
0287	Concern regarding the proposed rezoning of a chunk of land adjacent to Corkagh Park, Clondalkin	4	<p>Manager's Response Comment noted, however, as the lands in question have not been clearly identified it is not possible to comment further.</p> <p>Manager's Recommendation No change recommended.</p>

6.11.5 MAP 5

ZONING REQUESTS

Land Use Zoning Requests in Relation to Residential						
Sub. No.	Location Description	Area(ha)	Map	Existing Zoning	Proposed Zoning	Manager's Response & Recommendation
0108	Marlay Grange House	4.7	5	F Open Space	A Residential	<p>Manager's Response The site is surrounded by open space zoned lands. Marlay Grange, a protected structure (RPS No 308) is located on-site. It is probable that the site forms part of an interconnected biodiversity network of habitats due to proximity to Marley Park and Grange Golf Club and the presence of mature treelines within and directly outside of the site. Rezoning of the lands as requested would prejudice the maintenance of biodiversity corridors around and through the site, and the protection of the integrity of the protected structure and its curtilage. Furthermore, given the existing availability and location of zoned residential land coupled with the widespread opportunity for mixed-use and infill development within the County, it is considered that no expansion of residentially zoned land is required at this time.</p> <p>Manager's Recommendation No change recommended.</p>
0155	Whitehall Rd		5	A Residential	LC Local Centre	<p>Manager's Response It is not considered appropriate at this time to rezone the land for Local Centre purposes. There are ample Local Centre zonings as well as a District Centre zoning adjacent, and in proximity, to the site.</p> <p>It not considered warranted at this time to zone any more land for Local Centre uses.</p> <p>Manager's Recommendation No change recommended.</p>
0175	Ballyboden	1.29	5	A	DC District	<p>Manager's Response</p>

				Residential	Centre	<p>The Retail Strategy for the Greater Dublin Area (2008-2016) proposes a five-tier hierarchy of retail centres in the Greater Dublin Area based on the Retail Planning Guidelines for Planning Authorities (2005). The Council accepts this as a general basis for future retail planning in the County. A critical part of delivering the overall vision for the retail strategy is the recognition of the retail hierarchy as a core spatial policy. The Plan contains a clear retail hierarchy and it is not considered appropriate at this time to rezone the land for District Centre purposes. There are ample Local Centre zonings in close proximity to the site to provide for the needs of the local community.</p> <p>It not considered warranted at this time to zone any more land for District Centre uses.</p> <p>Manager's Recommendation No change recommended.</p>
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6.11.6 MAP 6

ZONING REQUESTS

Land Use Zoning Requests in Relation to Enterprise and Employment						
Sub. No.	Location Description	Area(ha)	Map	Existing Zoning	Proposed Zoning	Manager's Response & Recommendation
0166	Bustyhill	22ha	6	Objective B Agriculture	EP3 Enterprise Priority Three Zoned Lands	<p>Manager's Response The submission requested rezoning the subject site from objective B to EP3 Enterprise Priority Three Zoned Lands.</p> <p>A substantial amount of industrial and enterprise land has been zoned within the County and it is considered that this would be sufficient to meet the needs of industry, enterprise and employment during the development plan period. Although the lands are close to the N7, they are situated in a rural area and not close to existing industrial areas.</p> <p>As a result of the above it is not considered appropriate to rezone the subject lands.</p> <p>Manager's Recommendation No change is recommended.</p>
0219	Keatingspark	9.26ha	6	Objective B Agriculture	EP3 Enterprise Priority Three Zoned Lands	<p>Manager's Response The main local challenges facing this County are the maintenance and improvement of a sustainable economic base; the maintenance of existing jobs and the creation of new employment opportunities. One of the core strategic aims of the development plan is the promotion of significant new economic development along defined economic corridors based on fixed and developing public transport corridors. The site, although located in close proximity to the N7, is not accessible by public transport and is not located along a public transport corridor. Furthermore, a substantial amount of industrial and enterprise land has been zoned within the County and it is considered that this would be sufficient to meet the needs of industry and enterprise and</p>

						<p>employment during the development plan period. In regard of all the above points it is considered that sufficient land has been zoned to accommodate the growth of existing and proposed businesses during the life time of the plan and the site should remain as zoning Objective B 'to protect and improve rural amenity and to provide for the development of agriculture'.</p> <p>Manager's Recommendation No change recommended.</p>
Land Use Zoning Requests in Relation to Residential						
Sub. No	Location Description	Area(ha)	Map	Existing Zoning	Proposed Zoning	Manager's Response & Recommendation
0235	Lands at Brittas Ponds	12.3	6	H Dublin Mountains	F Open Space	<p>Manager's Response Having regard to the location of the subject lands outside the Metropolitan Area as designated in the Regional Planning Guidelines GDA, and to the proposed Natural Heritage Area designation at Brittas Ponds and associated lands, it is considered that the current zoning in the Draft Development Plan is appropriate in this location.</p> <p>Manager's Recommendation No change recommended</p>
Land Use Zoning Requests in Relation to Town District and Local Centres						
Sub. No.	Location Description	Area(ha)	Map	Existing Zoning	Proposed Zoning	Manager's Response & Recommendation
0015	Poitin Stil, Rathcoole	0.55	6	A Residential & F Open Space	LC Local Centre	<p>Manager's Response It is not considered appropriate to rezone the land for Local Centre purposes. The site is located off the N7 with limited accessibility and would be unsuitable for any additional intensification of use on the site having regard to the close proximity of Rathcoole Village and the objectives of the Plan which seek to consolidate the urban environment and ensure the vitality and vibrancy of the County Villages.</p> <p>Furthermore, it is not considered warranted at this time to zone any more land</p>

						for Local Centre uses. Manager's Recommendation No change recommended.
0235	Lands east of Brittas village	12.3	6	H Dublin Mountains		Manager's Response Having regard to the location of Brittas outside the Metropolitan as designated in the Regional Planning Guidelines GDA, and to the lack of appropriate public services, it is considered that the development of residential development at this location would be contrary to the provisions of the Core Strategy of the Draft Plan which aims to provide a more consolidated and compact urban form for the County. Furthermore, given the existing availability and location of zoned residential land coupled with the widespread opportunity for mixed-use and infill development within the County, it is considered that no expansion of residentially zoned land is required at this time. It is proposed that a study be carried out informing the future development of Brittas. Manager's Recommendation No change recommended.

LAND USE ZONING ISSUES

Land Use Zoning issues in relation to Landscape, Natural Heritage and Biodiversity.						
0071	Request the re-zoning of land in the hinterland of Brittas to 'G' zoning (3 Km Radius).		6			Manager's Response The current zoning for the Brittas area is considered the most appropriate having regard to its location within the Dublin Mountains area, and within the Hinterland Area designated in the Regional Planning Guidelines for the Greater Dublin Area. Manager's Recommendation No change recommended.

6.11.7 MAP 7

ZONING REQUESTS

Land Use Zoning Requests in Relation to Residential						
Sub. No	Location Description	Area(ha)	Map	Existing Zoning	Proposed Zoning	Manager's Response & Recommendation
0209	Kiltalown	7 ha	7	F Open Space	A/ Nursing Home	<p>Manager's Response The lands are not well served by public transport, and are not considered to be suitable for residential development. It is considered that residential development at this location would be contrary to the provisions of the Core Strategy of the Draft Plan which aims to provide a more consolidated and compact urban form for the County. Given the existing availability and location of zoned residential land coupled with the widespread opportunity for mixed-use and infill development within the County, it is considered that no expansion of residentially zoned land is required at this time.</p> <p>It is considered that the provision of a nursing home at this location would be inappropriate having regard to Policy H21: Locations for Housing for the Elderly which sets out that accommodation for the elderly should be located in existing residential areas, well served by infrastructure and amenities in order not to isolate residents and allow for better care in the community, independence and access.</p> <p>Manager's Recommendation No change recommended.</p>

LAND USE ZONING ISSUES

Land Use Zoning issues in relation to Landscape, Natural Heritage and Biodiversity.			
0013	In favour of retaining the lands located to the south of the M50 motorway for agricultural purposes.	4 & 7	<p>Manager's Response Comment noted.</p> <p>Manager's Recommendation No change recommended.</p>

GENERAL LAND USE ZONING ISSUES

Sub No	Issue	Manager's Response and Recommendation
0121	There is no requirement to zone additional lands for employment use having regard to the significant amount of employment land already zoned from the 2004 Development Plan and not yet developed.	<p>Manager's Response The draft development plan provides for limited additional zoning changes having regard to the extent of lands previously allocated that are available for development. In determining the extent of lands required to satisfy estimated demands in the medium term, the Council has had regard to the relevant regional and national guidelines.</p>
0284	Concern regarding rezoning of land from agriculture to housing and industrial development.	<p>Manager's Recommendation No change recommended.</p>
0131	Suggest council examines the possibility of realising the potential of Dublin's peri-urban regions by researching Peri Urbans Regions Platform Europe (PURPLE) regarding food security and sustainably managed open space	<p>Manager's Response Comment noted.</p> <p>Manager's Recommendation No change recommended</p>
0258	Alarmed at the manner in which proposed re-zonings are not being recorded in written format	<p>Manager's Response The Draft Development Plan 2010-2016 is a new Development Plan. In accordance with the Planning and Development Act all lands have been considered and the appropriate zoning placed upon them.</p> <p>Manager's Recommendation No change recommended.</p>
0105 0144	No zoning for the life of the CDP, if it becomes necessary to rezone a material variation should be the only method used	<p>Manager's Response Any future proposals for variations of the County Development Plan 2010-2016, when adopted, will be subject to the appropriate statutory procedures.</p> <p>Manager's Recommendation No change recommended.</p>

7. ENVIRONMENTAL REPORT

Response to the Environmental Issues arising from

- a) Environmental Authorities Submissions and**
- b) Non Statutory Submissions**

following the 1st public display of the

Draft South Dublin County Development Plan 2010 - 2016

and Environmental Report



**17th February 2010
Planning Department,
South Dublin County Council**

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Introduction

The purpose of this Report is:

- To detail the written submissions received from the Environmental Authorities and the Non Statutory Submissions following the public display period of the Draft Development Plan 2010-2016 and accompanying Environmental Report and Appropriate Assessment screening.
- To set out the County Manager's response to the issues raised in the submissions and;
- To make recommendations on the amendment to the Draft Development Plan as appropriate.

Legislative Background

Section 12 (4) of the Planning and Development Act 2000 makes provision for the consideration of submissions or observations made under Section 12 (2) of the Act in relation to draft development plans. This provision is through the preparation of a report by the Manager of the planning authority on any submissions or observations and the submission of this report to the members of the authority for their consideration. The Manager's Report is required to list the persons or bodies who made submissions, summarise the issues raised and give the Manager's response to those issues.

Section 13(C) of the Planning and Development Act (Strategic Environmental Assessment) Regulations 2004 requires that, inter alia, any reference to a draft development plan in Section 12 (2) of the Act is to be construed as also referring to the environmental report. Therefore submissions or observations made under Section 12 (2) in relation to both the draft development plan and the environmental report must be considered under Section 12(4) of the Act through the Manager's Report.

South Dublin County Council has prepared this report in the above legislative context.

Key Stages in the Strategic Environmental Assessment (SEA) of the proposed South Dublin County Development Plan 2010-2016 to date.

Table 1. Key SEA stages to date.

Date	Stage
4 th November 2008	<p>The Council gave notice on the 4th November 2008 of the intention to review the County Development Plan 2004-2010 and prepare a new County Development Plan for the South Dublin County Council area.</p> <p>It was also stated that the planning authority would carry out a Strategic Environmental Assessment [SEA] as part of the review process. As a part of this process, the planning authority would prepare an Environmental Report on the likely significant effects on the environment of implementing the proposed plan.</p> <p>Written submissions or observations regarding the review of the existing County Development Plan and the preparation of the proposed plan were invited from members of the public and other interested parties.</p>
8 th December 2008	<p>The Planning Department issued formal written notification to the Environmental Authorities i.e. the Environmental Protection Agency (EPA), the Department of the Environment, Heritage and Local Government (DEHLG) and the Department of Communications, Marine and Natural Resources (DCMNR) that a review of the existing Development Plan was underway and that a new Development Plan was being prepared. Submissions or observations were invited in relation to the scope and level of detail of the Environmental Report.</p>
16 th December 2008	<p>The Scoping Issues Paper was sent to the Environmental Authorities in order to facilitate their involvement in the scoping exercise.</p>
23rd th December 2008	<p>The Scoping Issues Paper was put on the South Dublin County Council web site with the following note;</p> <p>“This Environmental Scoping Issues Paper has been prepared in order to facilitate the prescribed Environmental Authorities in respect of the Strategic Environmental Assessment of the proposed new South Dublin County Development Plan 2010 – 2016. The prescribed Environmental Authorities are as follows</p> <ul style="list-style-type: none"> ○ Environmental Protection Agency (EPA); ○ Department of Environment, Heritage and Local Government (DEHLG); ○ Department of Communications, Energy and Natural Resources (DCENR). <p>The Environmental Scoping Issues Paper is being provided on the web for information purposes. The outcome of the scoping process will form the basis for the preparation of the Environmental Report which is being undertaken in parallel and in tandem with the revision of the Development Plan.”</p> <p>Click here to read the Scoping Issues Paper.</p>
9 th February 2009	<p>All submissions received from the Environmental Authorities.</p>
9 th April 2009	<p>The Scoping Report including the original Issues Paper; Responses to the Environmental Authorities Submissions on the issues paper</p>

	and an Addendum Report were published in April and made available on the Council website.
16 th July 2009	Pre-Draft Development Plan, Environmental Report and Appropriate Assessment Screening delivered to Elected Representatives for review and to allow for motions of amendment.
1 st /2 nd /7 th /8 th September	Assessment and mitigation of environmental affects of implementing elected members motions outlined in Manager's Report. Adoption of motions of direction regarding Draft Development Plan.
22 nd September-2 nd December	Public consultation period for Draft Development Plan, Environmental Report and Appropriate Assessment Screening.

Submissions from Environmental Authorities December 2009

The table below sets out the submissions from the Environmental Authorities and the environmental non-statutory submissions in relation to the Draft Development Plan 2010-2016, accompanying Environmental Report and Appropriate Assessment Screening. The table also contains a response by the Manager pertaining to the item.

Submission Summary	Comment
<p>Submission No.1</p> <p>Nature Conservation The Nature Conservation Section of the DOEHGL</p> <p>Under section 2.3.1.2, the Department welcomes the intention to protect feeding areas of greylag geese that roost on the Poulaphouca Reservoir SPA by subjecting proposed developments in this area to impact assessment. However, there does not appear to be any cross-reference to this in section 3 of the Plan.</p> <p>The Department welcomes the protection afforded to SACs, pNHAs, wildlife habitats, hedgerows, rivers and streams and wildlife corridors by policies within section 3 (Landscape, Natural Heritage and Amenities) of the Draft Plan. While mention of species protected under European law is noted, there appears to be no mention of species protected under National Law. Apart from protecting their habitats and wildlife corridors where possible (Policy LAH19). It is important to note that such species are protected wherever they occur and not just in designated sites or wildlife corridors. It is recommended that mention be made of protected flora and fauna under National as well as EU law.</p> <p>Bat species are protected under both National and EU law and the policy relating to lighting of key buildings and the Liffey Bridge within the Plan for Lucan has the potential to impact adversely on bat species where they are present.</p> <p>While acknowledging that the Plan affords protection to rivers, streams and canals, care must be taken to ensure that the provision of</p>	<p>Noted. Section 2.3.1.2 of the Appropriate Assessment notes the location of the Greylag Geese feeding area. It is proposed that mention of the Greylag Geese feeding area will be noted in the explanatory text of policy LHA19: (4.3.7.xvii) Flora and Fauna. Recommendation: In conjunction with the NPWS, the Council will require impact assessment of proposed development in Brittas and Aghfarrell on the feeding areas of protected Greylag Geese.</p> <p>Acknowledged. As noted, Policy LHA 19: (4.3.7.xvii) Flora and Fauna notes the conservation of existing flora and fauna through the protection of wildlife corridors and habitats wherever possible. It is considered appropriate that this policy should be widened to mention species protected under National law. Recommendation: The Council will help ensure that any E.U and Nationally protected species are not placed under further risk of reduction in population size. (italics shows new wording)</p> <p>It is accepted that the wording of SLO 7 is not specific enough in requiring that lighting to be provided should militate against impacts on bat species along the Liffey. It is recommended that this will be amended. Recommendation: SLO 7. Encourage and facilitate the sensitive and selective lighting of key buildings and structures in Lucan Village such as Churches and the Liffey Bridge. The design of any proposed future lighting of the Liffey Bridge shall be subject to assessment of the impact of lighting on bat roosting, hunting and movements.</p> <p>Policy LHA 21: (4.3.7.xix) Watercourses indicates that the promotion of access,</p>

<p>amenities such as footpaths, to give access to the waterways, do not result in adverse impacts on protected flora, fauna or habitats. Watercourses are valuable wildlife corridors and additional disturbance can reduce their value for species. Similarly, while acknowledging that the Plan affords protection for pNHAs, when considering the provision of facilities in the Liffey Valley or Slade of Saggart, which are both within pNHAs, care should be taken to ensure that such amenities do not detract from the scientific interest of the sites. Amenities provided within natural habitats provide a good opportunity for raising awareness of nature conservation issues and promoting an appreciation of our natural environment.</p> <p>With regard to the objective to examine the possibility of designating a highland area of the county as being suitable for the production of wind energy, it is recommended that the Departmental Guidelines and compliance thereto are referred to in the Plan. In addition such a designation would be subject to appropriate assessment screening and if necessary appropriate assessment.</p> <p>In relation to the maps, it is noted and of concern that on map 1 there is a long term road proposal that appears to stop just before going through the Liffey Valley pNHA. An arrow is shown at the end of the proposed road which implies that it would continue at some future date to go through the pNHA and across the Liffey in the vicinity St. Catherine's Wood. The Liffey Valley pNHA is a wildlife corridor and an important site for biodiversity including protected species and rare plants. The above proposed long term road also crosses the Grand Canal at Gollierstown. A previous submission from the Department's Development Applications Unit (ref. G2009/878) on the importance of this part of the canal and the surrounding lands refers. Such a road has the potential to impact on two water courses which are important wildlife corridors. They are likely to contain otters and bats, which are listed on Annex IV of the Habitats Directive, and this issue should be assessed in the SEA.</p> <p>Also, it is recommended that the boundaries</p>	<p>walkways and other recreational uses on public space open space alongside watercourses will be subject to defined strategies of nature conservation. Policy LHA 22: (4.3.7.xx) Protection of the Grand Canal indicates that it is policy to enhance the visual, recreational, environmental and amenity value of the Grand Canal, and furthermore states that all developments adjoining the Grand Canal should be accompanied by a Biodiversity Action Plan. Both the Liffey and Slade Valleys are pNHAs. Policy LHA8 (4.3.7.vi), Special Areas of Conservation and proposed Natural Heritage Areas, notes that it is policy to protect and preserve these area, while also noting that such places may be damaged by recreational overuse. It is considered that any amenity development in either Slade or Liffey Valleys would be required to be in compliance with relevant policies on the protection of pNHAs.</p> <p>Section 2.5.11 relating to wind energy indicates in paragraph 3 that regard will be had to the Wind Energy Development Guidelines for Planning Authorities. Policy LHA1 (4.3.5.i) Preservation of Landscape Character, and the further development of Landscape Character Areas Assessment will also assist in the landscape character preservation.</p> <p>It is also considered that wind energy development would be subject to appropriate assessment screening due to the proximity of the Dublin Mountains SAC and the proposed Dublin Mountains SPA.</p> <p>The alignment of the road was raised in the scoping submission by the DoEHLG. Taking into account the submission, the sensitivities contained therein and the potential for significant negative impact of the western road on receiving environments, mitigation in the form of SLO 33 was required to be inserted into the Draft Development Plan. This SLO requires that the road shall be subject to a sustainability assessment in order to ascertain the need for the project, and in the event of the road being approved by the sustainability assessment, an EIA requiring full examination of alternative alignments will be required, with particular attention to be paid to potential for impact upon the Grand Canal. It is considered that these mitigation measures will ensure that the need for the road would first be required to be established, while any road alignment would be carefully considered for</p>
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<p>of SAC and pNHA are checked with the National Parks and Wildlife Service of this Department prior to finalising the Plan, as boundaries can change from time to time.</p> <p>Appropriate Assessment Screening It is noted that the screening report templates provided for by the European Commission in their guidance document on Appropriate Assessment have not been used. It is useful to follow the format of these templates to ensure all the necessary impacts are covered such as land-take, resource requirements, reduction of habitat, climate change etc. For information, this guidance document is entitled "Assessment of plans and projects significantly affecting Natura 2000 sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC" and was mentioned in our circular letter of 2008 entitled "Circular Letter SEA 1/08 & NPWS 1/08 Appropriate Assessment of Land Use Plans".</p>	<p>environmental impacts on habitats and species in addition to landscape and other impacts.</p> <p>Acknowledged.</p> <p>The Appropriate Assessment Screening was undertaken using a template arising from a Heritage Training seminar on 26th February 2009 attended by NPWS. Following the subsequent production in December 2009 of the NPWS's <i>Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities</i>, the SDCC Screening document was reassessed and no amendments to the outcome of the screening process are deemed to be necessary.</p>
<p>Submission No.2</p> <p>The Eastern Regional Fisheries Board</p> <p>The significant fisheries catchments of South Dublin County are the Rivers Dodder and Liffey and the Grand Canal.</p> <p>The Rivers Dodder and Liffey are exceptional among most urban rivers in the area in supporting Atlantic salmon (<i>Salmo salar</i>, Annex II of the EU Habitats Directive) and sea trout in addition to resident brown trout (both <i>Salmo trutta</i>) populations. These characteristics highlight the sensitivity both of the local main channels and the broader Dodder and Liffey catchments including Bohernabreena Reservoir. Sensitive and nationally important fish species migrate through and reside within the river sections of the South County. Thus, it is important to note that salmonid waters constraints apply to any development in this area.</p> <p>The Board's policy is to maintain watercourses and riparian zones in their open natural state in order to prevent habitat loss and aid in pollution detection. The Board would welcome the designation of lands adjacent to surface waters, particularly salmonid systems as areas of open preservation allowing protection /</p>	<p>This information is noted in the Environmental Baseline and informed Policies LHA20 (4.3.7.xviii) River and Stream Management, LHA21 (4.3.7.xix) Watercourses and LHA22 (4.3.7.xx) Protection of the Grand Canal.</p> <p>Please see the explanatory note above.</p> <p>Noted. LHA20 (4.3.7.xviii) River and Stream Management, and LHA21 (4.3.7.xix) Watercourses indicate that it is the objective of the Council to limit development in Flood Plains and to preserve riparian corridors. Development proposals in river corridors would only be considered where they</p>

<p>enhancement of biological diversity while providing open space and recreational amenity for river users.</p> <p>Best management practice should be implemented at all times in relation to any activities that may impact on riverine or riparian habitats. Any planned discharges to surface streams must not impact negatively on the salmonid status of the system. The design and construction of any surface water outfall chambers to rivers should be implemented in an ecologically sound and fisheries-sensitive manner. The use of concrete (or other toxic materials) at riparian and in-stream locations should only occur in the dry to prevent contamination of adjacent surface waters.</p> <p>The continued implementation of a SUDS design for surface water disposal is requested and should, in conjunction with good management of a site, assist in flood and pollution control. Policies and recommendations made under the Greater Dublin Strategic Drainage Study (GSDSDS) should be applied in development of a drainage strategy for the Plan, e.g. reduction in leakage from water supply systems, provision of separate foul and surface water networks etc</p> <p>It is essential that sufficient treatment capacity is available both within the receiving sewerage system locally and downstream at</p>	<p>preserve biodiversity, maintain a minimum of 10m to either side of the riverbank and maintain the character and appearance of the riverbank. Land-filling, culverting, diversion or re-aligning of river or stream corridors will not be permitted. It is recommended that in certain circumstances, this setback may require additional width.</p> <p>Recommendation Amend Section 2.3.9 (7th overall bullet point) to require in developments adjacent to watercourses, that any structure must be set back a minimum distance of 10m from the top of the bank to allow access for channel cleaning and maintenance, unless otherwise agreed with the Planning Authority. This may be increased depending on the size of the watercourse and any particular circumstances.</p> <p>Also amend 4.3.7.xviii Policy LHA20 first bullet point to read "Dedicate a minimum of 10m each side of the waters edge for amenity, biodiversity and walkway purposes where practical; this may be increased depending on the size of the watercourse and any particular circumstances;</p> <p>Salmonid waters constraints apply to all planned discharges including surface water outfalls. The requirements of the WFD to improve river and surface waters to 'Good' status will require improvement in water quality of any discharges and outfalls to the Liffey and Dodder. This is noted in Policy WD5 (2.3.12.i) Water Quality Management Plans, WD6 (2.3.12.ii) Sustainable Urban Drainage Systems, WD7 (2.3.12.iii) Storm Overflows and WD8 (2.3.12.iv) Water Pollution Abatement Measures.</p> <p>Acknowledged. Policy WD6 (2.3.12.ii) Sustainable Urban Drainage Systems indicates that it is the policy of the Council to ensure that all development proposals incorporate SuDS. Policy WD1 (2.3.6.i) Water Supply and Drainage indicates that it is Council policy to meet the anticipated water and drainage requirements of the area, in accordance with the recommendations set out in the <i>GSDSDS</i> and <i>Greater Dublin Strategic Water Supply Study</i>, and the proposed <i>Dublin Region Water Services Strategic Plan</i> (when adopted).</p> <p>Acknowledged. Policy WD2 (2.3.8.i) Wastewater Treatment Plants and Wastewater Collection Systems indicates that it will be Council policy to ensure that</p>
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<p>the relevant Waste Water Treatment Plant in order that the ecological integrity of the ultimate receiving water is protected.</p> <p>The disturbance of riparian habitats should be minimised. An undisturbed buffer zone between development area and river bank should be maximised. Riparian vegetation should be retained in as natural a state as possible at all times.</p> <p>The protection of habitats outside designated areas and a stated commitment not permitting proposals that would interfere with natural floodplains would be hugely beneficial to the aquatic and riparian environment. We are opposed to any development on floodplains.</p> <p>In addition we suggest that Septic tank and Percolation areas should conform with the EPA, Code of Practice, Wastewater Treatment and Disposal Systems serving Single Houses 2009 (Ref ;A living Place Housing, Section 1.2.53 Domestic Effluent Disposal)</p> <p>All road construction.... shall be designed to minimise the impact of the construction and operation of roads and watercourse crossings on fish and their habitat etc (Ref; Transportation Section 2.2.37 Road Objectives) Here we refer you to our guideline document the "Requirements for the Protection of Fisheries Habitat during Construction and Development Works at River Sites" (http://www.fishingireland.net/erfb/protect.htm)</p>	<p>development shall be preceded by sufficient capacity in the public wastewater treatment plants and appropriate extensions in the existing public wastewater collection systems.</p> <p>See previous comment above regarding riparian zones above.</p> <p>Acknowledged. Policy LHA19 (4.3.7.xvii) Flora and Fauna notes that it is Council policy to protect natural resources within the County and to conserve the existing wide range of flora and fauna in the County through the protection of wildlife habitats and corridors wherever possible. Additionally, it is proposed to strengthen this policy through noting the need to protect nationally protected species.</p> <p>Section 2.3.21 of the Draft Plan deals with flooding, and indicates within Policy WD13 (2.3.22.i) Risk of Flooding, the Councils intention to fulfil its responsibilities under the Flood Risk Directive 2007/60/EC and to implement the recommendations of the Guidelines on the Planning Systems and Flood Risk Management (2008) including using the Guidelines to assess applications for planning permission.</p> <p>Acknowledged. It is recommended that Section 1.2.53 be updated accordingly.</p> <p>Recommendation: On sites where a treatment plant is proposed, the treatment plant and the percolation areas shall comply with the requirements of the Code of Practice on Wastewater Treatment and Disposal Systems serving Single Houses (October 2009).</p> <p>Acknowledged. It is recommended that reference to the guideline document is included at the end of the relevant bullet point.</p> <p>Recommendation: Minimise the impact of the construction and operation of roads and watercourse crossings on fish and their habitat and other wildlife habitats, e.g. crossing points for badgers etc., through consultation with appropriate authorities, and through implementing 'Requirements for the Protection of Fisheries Habitat during the Construction and Development Works at River Sites'.</p>
<p>Submission No. 3</p>	

<p>Environmental Protection Agency</p> <p>Integration of Environmental Considerations in the Land Use Plans</p> <p>There is no reference in the Plan to the findings of the SEA or the AA screening process. Consideration should be given to including the following in the Plan: - A table to summarise the key findings of the SEA process - A summary description of the integration of the parallel processes of Plan preparation, Appropriate Assessment and Strategic Environmental Assessment. - A description of how the development of the preferred Plan Alternative has influenced the development of the Draft Plan itself.</p> <p>The Plan should promote the development and implementation of Procedures to ensure compliance with the requirements of the SEA Directive and related SEA Regulations for all Land Use Plans within the Plan area.</p> <p>Consideration should be given to the inclusion of a specific Policy/Objective in the Plan to ensure full compliance, with the requirements of Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment – The SEA Directive and the associated Planning and Development (Strategic Environmental Assessment) Regulations, 2004. –</p> <p>The Plan should include relevant Policies and Objectives are included, to address, where appropriate, the “Main Environmental Challenges” for Ireland as set out in Chapter</p>	<p>Acknowledged. It is recommended that an expanded section in relation to these aspects be included in the Development Plan. See final recommendation in Recommendations.</p> <p>These procedures already exist in South Dublin County Council.</p> <p>Acknowledged. It is recommended that the requirements in relation to the SEA Directive and subsequent national legislation be included in the Core Strategy of the Plan under Development Management Guidance as follows:</p> <p>Recommendation Alter heading of Section 0.4.4 from “Environmental Impact Assessment” to “Environmental Assessment”, introduce “Environmental Impact Assessment” as Section 0.4.4.1 and “Strategic Environmental Assessment”, as Section 0.4.4.2 Section 0.4.4.2: Strategic Environmental Assessment The Council is committed to ensure full compliance the SEA Directive (Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment) as transposed into Irish Law through the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (SI No. 436 of 2004).</p> <p>Acknowledged. A series of measures with regard to</p> <ul style="list-style-type: none"> • mitigating the causes and effects of
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<p>16 – “Main Environmental Challenges” of EPA Ireland’s Environment 2008 (EPA, October 2008).</p> <p>Water Quality Consider including specific objectives and measures to mitigate discharges from landfills, mines and contaminated lands to the Dodder and Camac Rivers.</p> <p>Consideration should be given to including a specific policy to ensure inclusion of the CFRAMS results / recommendations for the Rivers Dodder and Liffey, when available.</p> <p>The plan should promote the protection of surface water, groundwater, coastal and estuarine water resources and their associated habitats and species, including fisheries.</p>	<ul style="list-style-type: none"> climate change • preventing eutrophication and other forms of water pollution • protecting natural habitats and species populations and • the remediation of contaminated land <p>have been integrated into the Plan.</p> <p>Policy WD5 (2.3.12.i) Water Quality Management Plans of the Draft Plan notes that it is policy of the Council to implement the Eastern River Basin Management Plan (ERBMP) and associated Programme of Measures. The full programme of measures is listed within the Environmental Report.</p> <p>Recommendation: “and in accordance with the policies and objectives and programme of measures of the Eastern River Basin Management Plan when adopted and any future amendments.”</p> <p>Section 2.3.25 notes that recommendations and outputs from the CFRAMS process will be incorporated into the Development Management process. This will ensure that long term strategies and programmes for flood risk management will be implemented on an ongoing basis. It is recommended that attention be drawn to the CFRAMS flood extent maps and the “alluvial soils” floodplain maps by means of a SLO located alongside the potential flooding areas;</p> <p>SLO: The areas of flooding potential as indicated in the Dodder Catchment Flood Risk Assessment Management Study (CFRAMS) and the OPW “alluvial soils” floodplain maps are to be taken into account along with the requirements of Section 5 of The Planning System and Flood Risk Management Guidelines (November 2009) when assessing planning applications, with a view to restricting or, if necessary, refusing development proposals within such areas in order to avoid flooding events.</p> <p>Noted. Policies WD3 (2.3.10.i) Quality of Surface Water and Groundwater, WD5 (2.3.12.i) Water Quality Management Plans, WD6 (2.3.12.ii) Sustainable urban Drainage Systems, WD8 (2.3.12.iv) Water Pollution Abatement Measures, LHA9 (4.3.7.vii) Impacts on Natura 2000 Sites, LHA19 (4.3.7.xvii) Flora and Fauna, LHA20 (4.3.7.xviii) River and Stream Management, and LHA21 (4.3.7.xix) Watercourses, deal</p>
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<p>Wastewater Treatment</p> <p>Consideration should be given to addressing capacity issues at Ringsend and include a specific policy to take account of the findings of the “Greater Dublin Strategic Drainage Study” as appropriate for South Dublin</p> <p>Reference should be made to the updated <i>Urban Waste Water Discharges in Ireland for Population Equivalents Greater than 500 Persons – A Report for the Years 2006 and 2007</i>, (EPA 2009), and complying with the recommendations as relevant and appropriate to South Dublin.</p> <p>The EPA has published a <i>Code of Practice: Wastewater Treatment and Disposal Systems Serving Single Houses (p.e < 10)</i>, (EPA, 2009). Reference should be made to this report as appropriate.</p> <p>Waste Management</p> <p>Consideration should be given to the inclusion of a Policy/Objective to prioritise the provision of adequate and appropriate waste-related infrastructure (recycling / recovery etc.) in advance of any significant development.</p> <p>Consideration should be given to the inclusion of a new Objective / Policy (or the amendment of Policy ES12) to include the use of statutory powers to prohibit the illegal burning, deposit and disposal of waste materials.</p> <p>Maximisation of opportunities for waste prevention and source separation of waste through provision of adequate civic amenity and/or bring sites within Plan area. The benefits of such measures will be to minimise the amount of waste being consigned to</p>	<p>with the issues mentioned.</p> <p>Section 2.3 Water Supply and Drainage notes that significant improvements are required to the waste water collection and treatment infrastructure in the Dublin Region, as identified in the Greater Dublin Strategic Drainage Study. Policy WD1 (2.3.6.i) Water Supply and Drainage regarding Water Supply and Drainage, and WD2 (2.3.8.i) Wastewater Treatment Plants and Wastewater Collection Systems will allow for the implementation of the recommendations set out in the GSDS.</p> <p>Noted.</p> <p>Recommendation: The relevant text within section 2.3.8.i is to be updated to state ‘A report for the years 2006 and 2007’.</p> <p>Noted. Relevant sections of the Draft Plan should be updated.</p> <p>Recommendation: On sites where a treatment plant is proposed, the treatment plant and the percolation areas shall comply with the requirements of the Code of Practice on Wastewater Treatment and Disposal Systems serving Single Houses (October 2009)</p> <p>The Waste Management Plan for the Dublin Region informs the waste strategy. A number of policies ES6 (2.4.10.i) Waste Prevention and Reduction ES8 (2.4.12.i) Waste Re-use and Recycling, promote the recovery of construction and demolition waste , waste prevention and reduction Section 2.4.11 of the Draft Plan notes the intention to develop a network of countywide bring centres, civic amenity sites and green waste centres. Developments will also be required to implement the <i>Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects</i>.</p> <p>Noted. Policy ES12 (2.4.18.ii) Unauthorised Waste Disposal, details the strategy for unauthorised waste disposal, including the Council's policy for mandatory enforcement. This policy is considered sufficient.</p> <p>Noted. Policies ES1 (2.4.4.i) Waste Management Strategy, ES6 (2.4.10.i) Waste</p>
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<p>landfill as well as ensuring appropriate management of wastes.</p> <p>The Plan should take into account National and Regional Waste Management Planning processes so that priority waste issues are addressed i.e. the implementation of segregated brown bin collection for bio-waste.</p> <p>The Plan should highlight as appropriate the requirements of the regulations – <i>Waste Management (Certification of historic unlicensed waste disposal and recovery activity) Regulations 2008 (SI No. 524 of 2008)</i>, which provide for certification of historic unlicensed waste disposal sites in operation between 1977 and 1996.</p> <p>The Plan should make reference to the Department of the Environment, Heritage and Local Government Publication: <i>Best Practice Guidelines on the preparation of Waste Management Plan for Construction & Demolition Projects</i> July 2006. Section 3 of these Best Practice Guidelines recommends that developers of projects with significant potential for the generation of Construction and Demolition (C&D) should prepare a Waste Management Plan.</p> <p>Where brownfield development is to occur within Local Authority areas, the Plan should promote the undertaking of appropriate investigations to determine the nature and extent of any soil and/or groundwater contamination and the risks associated with site development work within the Plan area.</p> <p>Flooding Consideration should be given to reviewing existing zoned lands to identify potentially inappropriate zoned lands, in the context of flood risk potential, and amending as appropriate.</p> <p>Particular attention should be paid to a “number of the locations which have been identified as floodplains zoned for development in the 2004-2010 CDP and are carried through into the current Draft CDP”.</p> <p>You are referred to the Planning Guidelines on flooding in “<i>The Planning System and Flood Risk Management - (Environment, Heritage and Local Government – OPW, November 2009)</i>”, which should be considered in the context of any flood risk assessment.</p>	<p>Prevention and Reduction, ES7 (2.4.12.i) Waste Hierarchy, ES8 (2.4.12.i) Waste Re-use and Recycling and ES9 (2.4.14.i) Municipal Solid Waste Disposal, deal with the issues mentioned.</p> <p>Noted. Policies ES1 (2.4.4.i) Waste Management Strategy and ES2 (2.4.6.i) Waste Management Plans, regarding the implementation of Regional Waste Strategies deal with the issues mentioned.</p> <p>Noted. Policy ES13 (2.4.18.iii) Waste Management (certification of historic waste disposal and recovery activity) Regulations 2008, relating to historic waste sites deals with this issue.</p> <p>Noted. Section 2.4.17 of the Draft Plan notes this requirement, and states that such matters will be enforced through the Development Management system. This is considered appropriate.</p> <p>Noted. Policy WD4 (2.3.10.ii) Soil and Groundwater Contamination, includes this wording.</p> <p>Section 2.3.12 of the Draft Plan deals with risk of flooding. This section notes the main requirements of the Planning System and Flood Risk Management Guidelines and policy WD13 (2.3.22.i) Risk of Flooding, notes that the Council will implement these guidelines. Section 3.7.8.1 of the Environmental Report notes that areas identified as being subject to flooding have remained zoned for development. These sites have been reviewed in order to ascertain flood risk to future residences and businesses. It is recommended that the issue be identified on the Development Plan maps by means of an SLO as follows</p> <p>Recommendation</p>
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<p>The Plan should promote the development, where appropriate, of adaptation measures to account for the likely increased risk of flooding due to Climate Change within the Plan area.</p> <p>Drinking Water Reference should be made to the updated EPA Report <i>“The Provision and Quality of Drinking Water in Ireland – A Report for the Years 2007-2008”</i>, (Office of Environment Enforcement- EPA, 2009) and the inclusion of specific recommendations as relevant to South Dublin.</p> <p>Consideration should also be given to the incorporation of and reference to, the EPA's recent Drinking Water Advice Notes 1 – 5 where appropriate and relevant for South Dublin.</p> <p>The Plan should include, where applicable, specific objectives for the improvement of any water supplies in the LA area, in particular the plan should address the specific objectives to be achieved where these water supplies are included on the EPA's Remedial Action List.</p> <p>The Plan should take account of any Groundwater Protection Schemes and Groundwater Source Protection Zones data available at the Geological Survey of Ireland.</p>	<p>SLO: The areas of flooding potential as indicated in the Dodder Catchment Flood Risk Assessment Management Study (CFRAMS) and the OPW “alluvial soils” floodplain maps are to be taken into account along with the requirements of Section 5 of The Planning System and Flood Risk Management Guidelines (November 2009) when assessing planning applications, with a view to restricting or, if necessary, refusing development proposals within such areas in order to avoid flooding events.</p> <p>Section 2.3.21 of the Draft Plan deals with flooding, and indicates within Policy WD13 (2.3.22.i) Risk of Flooding, the Councils intention to fulfil its responsibilities under the Flood Risk Directive 2007/60/EC and to implement the recommendations of the DEHGL's <i>“The Planning System and Flood Risk Management – Guidelines for Planning Authorities”</i> including using the Guidelines to assess applications for planning permission.</p> <p>Noted. Policy WD13 (2.3.22.i) Risk of Flooding, deals with this issue.</p> <p>Noted.</p> <p>Recommendation: Update section 2.3.5 Water Supply and Drainage of the Draft Plan to replace A Report for the Years 2006-2007 with 2007-2008.</p> <p>Noted.</p> <p>The Plan contains numerous policies and objective regarding maintaining the high quality of drinking water provided in the County. It is noted that no water supplies within the County are listed in the Remedial Action List as released in April 2009.</p> <p>The Environmental Report (3.7.5.2) states that A county based groundwater protection scheme is being undertaken for South Dublin. Policy WD5 (2.3.12.i) Water Quality Management Plans states that it is the policy</p>
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<p>Integration of Infrastructure, Zoning and Development</p> <p>Where zoning/rezoning of lands and the introduction of new development is being proposed within the Plan area, the Plan should ensure the adequacy of the existing water supply/wastewater treatment facilities are assessed. This should address both capacity and performance and the potential risk to human health, water quality and water quantity. The potential impact on habitats and species of ecological importance should also be addressed as appropriate, from pressures impacting on water quality and quantity. This is of particular relevance in the context of the proposed SDZ areas.</p> <p>Biodiversity</p> <p>Consideration should be given to the inclusion of specific Policies/Objectives in the Plan to ensure that South Dublin County Council, in fulfilling its responsibilities in the supply of services, zoning of lands and authorisation of development, addresses the relevant threatened habitats and species identified in the National Parks and Wildlife Service Report <i>"The Status of EU Protected Habitats and Species in Ireland"</i>, (NPWS, Department of the Environment, Heritage and Local Government, 2008) which occur within or adjoining the Plan area</p> <p>The Plan Policies and Objectives should also, as appropriate, take into account the relevant <i>"Major Pressures on Habitats and Species"</i> with a view to ensuring the implementation of the Plan does not increase the major pressures on habitats and species in Plan area and adjoining areas. (NPWS, DOEHLG, 2008)</p> <p>The Plan should also take into account and implement in association with the National Parks and Wildlife Service, the <i>Main Objectives Over The Coming Five Years and Beyond</i>.(NPWS, 2008).</p>	<p>of the Council to promote the implementation of water quality management plans for ground and surface waters in the County.</p> <p>These issues are noted. Policies WD1, 2.3.6.i) Water Supply and Drainage, and WD2 (2.3.8.ii) Wastewater Treatment Plants and Wastewater Collection Systems, LH1, LH2, SN1 (1.4.1.i) Sustainable Neighbourhoods, SN2 (1.4.8.i) Design Statement, SN3 (1.4.8.ii) Existing Site Features, LHA8 (4.3.7.vi) Special Areas of Conservation and proposed Natural Heritage Areas, LHA9 (4.3.7.vii) Impacts on Natura 2000 sites, LHA19 (4.3.7.xvii) Flora and Fauna, LHA20 (4.3.7.xviii) River and Stream Management, and LHA21 (4.3.7.xix) Watercourses deal with the issues mentioned. Issues regarding SDZ areas are dealt with under a separate heading within this response.</p> <p>These issues are noted. Policies LHA8 (4.3.7.vi) Special Areas of Conservation and proposed Natural Heritage Areas, LHA9 (4.3.7.vii) Impacts on Natura 2000 sites, LHA15 (4.3.7.viii) Heritage and Biodiversity Plan, LHA18 (4.3.7.xvi) Hedgerows, LHA19 (4.3.7.xvii) Flora and Fauna, LHA20 (4.3.7.xviii) River and Stream Management, and LHA21 (4.3.7.xix) Watercourses, deal with the issues mentioned.</p> <p>Noted. Policies, LHA15 (4.3.7.viii) Heritage and Biodiversity Plan, LHA17, (4.3.7.xv) Trees and Woodlands, LHA18 (4.3.7.xvi) Hedgerows, LHA19 (4.3.7.xvii) Flora and Fauna, LHA20 (4.3.7.xviii) River and Stream Management, LHA21 (4.3.7.xix) Watercourses, LHA30 (4.3.9.vii) Green Structure, and LHA31 (4.3.9.viii) Greenbelts allow for the retention of existing habitats and biodiversity corridors which addresses many of the pressures on habitats and species within the County.</p> <p>The "Main Objectives Over The Coming Five Years and Beyond" as set out in the Conclusions of the National Parks and Wildlife Service Report "The Status of EU Protected Habitats and Species in</p>
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<p>The availability and status of Management Plans for the Glenasmole Valley cSAC, the Wicklow Mountains cSAC, the Liffey Valley pNHA, Grand Canal pNHA, Dodder Valley pNHA, Lugnamore Glen pNHA and Slade of Saggart and Crooksling Glen pNHA, should be determined.</p> <p>The Plan should promote the provision/application of appropriate buffer zones between designated ecological sites and areas zoned for development. Where the application of buffer zones is being considered, you should consult with the National Parks and Wildlife Service (NPWS) of the Department of Environment, Heritage & Local Government (DOEHLG) with regard to their application and implementation. The Eastern Regional Fisheries Board should also be consulted with where fisheries protection is a concern / objective</p> <p>The Plan should promote the protection non-designated habitats, species and local biodiversity features including rivers, wetlands, hedgerows, individual trees, streams, grassland etc.</p> <p>The provision of appropriate buffer zones between local biodiversity features and areas zoned for development should be considered. The Plan should provide for the promotion of protection of linkages between local</p>	<p>Ireland”, (NPWS, Department of the Environment, Heritage and Local Government”, (2008) are as follows:</p> <ol style="list-style-type: none"> 1. to achieve an improvement in the status of priority habitats that were assessed as “bad”, in particular raised bog and certain types of grassland, but also blanket bog, lagoons, sand dune systems, and some woodland habitats; 2. to achieve an improvement of the species assessed as bad, in particular the freshwater pearl mussel, but also Desmoulins’ whorl snail, natterjack toad, and three fish species: salmon, twaite shad and pollan; 3. to achieve an improvement in the status of non-priority habitats which were assessed as “bad” in particular, lakes, rivers and oak woodland; 4. to achieve an improvement in the knowledge base on the occurrence and status of habitats and species. <p>These objectives have been incorporated in the Plan through the range of policies as outlined in the two responses immediately above.</p> <p>There are draft Conservation Plans in the course of preparation by the National Parks and Wildlife Service at present for the SAC’s. There are no Management Plans available for the pNHA’s.</p> <p>Policy WD9 (2.3.14.I) Bohernabreena Reservoir and Catchment Area, requires the protection of the SAC’s and buffer zone. In other instances site analysis and the retention of existing site features as required in policies SN2 (1.4.8.i) Design Statement, SN3 (1.4.8.ii) Existing Site Features and H38 (1.2.52.x) Dwellings in Rural Areas. The GIS based environmental assessment and monitoring system envisaged for the Plan also includes the use of buffer zones.</p> <p>These issues are noted. Policies, LHA15 (4.3.7.viii) Heritage and Biodiversity Plan, LHA17, (4.3.7.xv) Trees and Woodlands, LHA18 (4.3.7.xvi) Hedgerows, LHA19 (4.3.7.xvii) Flora and Fauna, LHA20 (4.3.7.xviii) River and Stream Management, LHA21 (4.3.7.xix) Watercourses, LHA30 (4.3.9.vii) Green Structure, and LHA31 (4.3.9.viii) Greenbelts, deal with the issues</p>
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<p>biodiversity features and ecological networks e.g. hedgerows, watercourses etc. Opportunities for enhancement of local biodiversity features should be promoted where appropriate.</p> <p>The Plan should support and promote the implementation of key actions set out in the County Biodiversity Plan.</p> <p>Consideration should also be given to the inclusion of a policy recognising and increasing the awareness and protection of "Urban Biodiversity".</p> <p>The Plan should also refer to the protection of <i>Annex I- Habitats</i> and <i>Annex II -Animal and Plant</i> species of "Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora".</p> <p>Consider inclusion of a Policy/Objective to manage and mitigate against invasive species / noxious weeds as relevant to South Dublin.</p> <p>The Plan should consider amending Policy LHA19 to include the protection of species at risk, as appropriate.</p> <p>Consideration should be given to the inclusion of inclusion of a Policy/Objective for a phased and co-ordinated programme of Habitat Mapping (including wetlands) of the Plan area. This mapping should assist in identification of potentially significant sensitive ecological sites.</p> <p>Consideration should be given to including a new Policy (or amending Policy LHA9) to more clearly state the requirement for Appropriate Assessment screening of all proposed amendments to the adopted Plan and any projects, which may arise subsequent to adoption of the Plan</p>	<p>mentioned</p> <p>These issues are noted. Policies, LHA15 (4.3.7.viii) Heritage and Biodiversity Plan, LHA17 (4.3.7.xv) Trees and Woodlands, LHA18 (4.3.7.xvi) Hedgerows, LHA19 (4.3.7.xvii) Flora and Fauna, LHA20 (4.3.7.xviii) River and Stream Management, LHA21 (4.3.7.xix) Watercourses, LHA30 (4.3.9.vii) Green Structure, LHA31 (4.3.9.viii) Greenbelts, H38 (1.2.52.x) Dwellings in Rural Areas, SCR39 (1.3.32.vii) Open Space Network SCR40 (1.3.32.viii) Green Routes Network, SN2 (1.4.8.i) Design Statement, and SN3 (1.4.8.ii) Existing Site Features deal with the issues mentioned.</p> <p>Noted. LHA15 (4.3.7.viii) Heritage and Biodiversity Plan requires the creation of a Biodiversity Plan.</p> <p>Noted. Policies LHA15 (4.3.7.viii) Heritage and Biodiversity Plan, SN2 (1.4.8.i) Design Statement, and SN3 (1.4.8.ii) Existing Site Features all allow for the identification and retention of urban biodiversity.</p> <p>Noted. Policies LHA8 (4.3.7.vi) Special Areas of Conservation and proposed Natural Heritage Areas, LHA9 (4.3.7.vii) Impacts on Natura 2000 and LHA19 (4.3.7.xvii) Flora and Fauna, deal with the protection of protected habitats and species.</p> <p>Acknowledged. Recommendation: It is recommended that wording be inserted into explanatory text of Policy LHA19 (4.3.7.xvii) Flora and Fauna "requiring a programme to monitor and restrict the spread of invasive species such as those located along the River Dodder".</p> <p>Acknowledged. Please see response to the second issue raised by the Nature Conservation Section of the DOEHLG</p> <p>Policy LHA15 (4.3.7.viii) Habitat surveys will be undertaken as actions of the current Draft Heritage Plan. A Biodiversity Plan where further habitat and species surveys will be proposed is also an action of the Heritage Plan.</p> <p>Acknowledged. It is recommended that the explanatory text appended to Policy LHA9 (4.3.7.vii) Impacts on Natura 2000 sites, is amended to clearly state the need for</p>
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<p>You are also referred to the DOEHLG circular letter – SEA 1/08 & NPWS 1/08 (dated 15/02/08). The Circular specifically requires that any draft land use plan (or amendment/variation) must be screened for any potential impact on areas designated as Natura 2000 sites.</p> <p>New guidance from the DOEHLG will be forthcoming before the end of December 2009, which will need to be incorporated into the Plan through new Policies / Objectives or the amending of existing Draft Policies / Objectives where appropriate and relevant.</p> <p>Consider amending Policy LHA15 to ensure the preparation of the Biodiversity Plan occurs within the lifetime of the Plan. Consideration should also be given to the necessity for habitat mapping to better implement LHA19.</p> <p>Air and Noise The Plan should include reference to and, as appropriate, promote the implementation of Noise Directive and associated national regulations as well as the specific “measures”/ “actions” set out in or due to be set out in a proposed “ Noise Action Plan” for South Dublin.</p> <p>Consideration should be given to promoting specific Policies / Objectives in the Plan for</p>	<p>Appropriate Assessment of <i>proposed amendments</i> to the adopted Plan Recommendation: Replace ‘where relevant, projects will be screened’, with ‘projects noted within the National Parks and Wildlife Service <i>Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities (December 2009)</i> document will be screened’.</p> <p>Acknowledged. The Draft Plan includes provision for the screening of Natura 2000 sites (4.3.7.vii, final paragraph) The reference to any proposed amendments/variations to the Plan is acknowledged. Recommendation: replace ‘arising from this plan will’ with ‘arising from this plan and proposed amendments to the adopted plan will’</p> <p>The National Parks and Wildlife Service <i>Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities</i> was produced in December 2009. Accordingly it is recommended that the following text be incorporated into Section 4.3.7 vii as follows;</p> <p>Recommendation The Council will fulfil the requirements of the National Parks and Wildlife Service <i>Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities (December 2009)</i> for projects and plans.</p> <p>All subsequent plan-making and adoption of plans arising from this Plan will be screened for the need to undertake Stage 2 Appropriate Assessment under Article 6 of the Habitats Directive. Where relevant, projects will be screened for the need to undertake Stage 2 Appropriate Assessment under Article 6 of the Habitats Directive.</p> <p>Noted. Recommendation: replace following text within LHA15 (4.3.7.xiii) Heritage and Biodiversity Plan, ‘prepare a County Biodiversity Plan following public consultation’ with ‘prepare a County Biodiversity Plan following public consultation and within the lifetime of the Plan’.</p>
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<p>the protection and improvement, as appropriate, of air quality within the Plan area, particularly in areas zoned for increased urban and transport related development.</p> <p>Landscape Consideration should be given to the inclusion of a Policy to review existing Landscape Character Areas for South Dublin, and identify vulnerability and adequate protection of landscapes and visual corridors. Consideration should be given to amending Policy S39 to include “where they act as a barrier to views to landmarks”.</p> <p>The Plan should promote the protection of designated scenic landscapes, scenic views, scenic routes and landscape features of regional, county and local value. The Plan should also take into account the landscape character adjoining the Plan area. There is a need to take into account landscape features and designations adjoining the Plan area.</p> <p>Consideration should also be given to promoting the requirement for an appropriate “Visual Impact Assessment” for proposed development with potential to impact adversely on significant landscape features within the Plan area. The Plan should promote the application of standard impact assessment methodology for all such development.</p> <p>Strategic Development Zones (SDZ) The Plan should include a specific objective requiring the development by the local authority, in association with relevant key</p>	<p>Noted. Policy ES18 (2.4.28.i) Noise deals with the issues raised.</p> <p>Noted. Policy ES17 (2.4.26) Air Quality deals with the issues raised. Reduction of emissions was one of the Strategic Environmental Objectives of the environmental report.</p> <p>Noted. Policy LHA1 (4.3.5.i) Preservation of Landscape Character, relates to the preservation of Landscape Character, and notes the objective of the Council to further develop the Landscape Character Areas Assessment.</p> <p>It is considered that the instances noted under Policy S39 (3.4.20.i) Non-essential Advertising Structures, S40 (3.4.20.ii) Design of Advertising Signs and LHA1 (4.3.5.i) Preservation of Landscape Character, provide sufficient restriction to advertising signage.</p> <p>Noted. Policies LHA1 (4.3.5.i) Preservation of Landscape Character, LHA2 (4.3.5.ii) Views and Prospects, LHA10 (4.3.7.viii) Dublin Mountains Area above 350 metre contour, LHA 12 (4.3.7.x) Outdoor Recreational Potential of the Mountain Area, LHA13 (4.3.7.xi) Development within mountain areas or high amenity areas, LHA14 (4.3.7.xii) Development below the 120m contour in the Dublin Mountains Area, LHA16 (4.3.7.xiv) Forestry, LHA18 (4.3.7.xvi) Hedgerows, LHA19 (4.3.7.xvii) Flora and Fauna, LHA20 (4.3.7.xviii) River and Stream Management, LHA21 (4.3.7.xix) Watercourses, LHA30 (4.3.9.vii) Green Structure, and LHA31 (4.3.9.viii) Greenbelts, LHA32 (4.3.9.ix) Tree Planting and Landscape Enhancement, SN2 (1.4.8.i) Design Statement, and SN3 (1.4.8.ii) Existing Site Features deal with these issues. These policies place strong emphasis on the protection of landscape features, and the identification, assessment and retention of such features in areas which are subject of development proposals.</p> <p>The requirement for Landscape Impact Assessment is specifically included in</p>
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<p>stakeholders, of an <i>“Integrated Phase Implementation Plan/Programme for Critical Water, Surface Drainage and Waste Water related infrastructure”</i> to service the SDZ areas of Adamstown and Clonburris.</p> <p>Such a Plan/Programme should take into account the Phasing of the development of the SDZ areas and the vulnerability/Water Framework Directive Risk Categories of the receiving waters in the zone of influence of the SDZ areas and the water and wastewater related infrastructure servicing these areas.</p> <p>The proposed implementation and phasing of the SDZ areas should also take into account any revisions to population/targets likely to be allocated via the Regional Planning Guidelines currently under review.</p> <p>Environmental Report Issues <u>Appropriate Assessment Consultation</u> Consultation should be undertaken with the National Parks and Wildlife Service (NPWS) with regard to screening of the Plan for Appropriate Assessment.</p> <p><u>Non-Technical Summary</u> Ensure that the required information as described in Annex I of the SEA Directive, (g) and (i) in particular, are included in the Non Technical Summary.</p> <p><u>Existing Environment</u> For existing environmental problems identified in the Baseline Environment description, there would be merits in including a link with proposed mitigation measures emerging from the SEA process and/or specific Plan Policies / Objectives.</p> <p><u>Zone of Influence</u> The Environmental Report should identify the zone of influence of the Plan outside the Plan area e.g. possible impacts on air quality, water quality, fisheries, habitat and protected areas in adjoining counties or countries</p>	<p>LHA14 (4.3.7.xii) Development below the 120m contour in the Dublin Mountain Area and EC3 (2.5.7.i) Telecommunication Infrastructure in Sensitive Landscapes.</p> <p>Adamstown and Clonburris Strategic Development Zones and their respective Planning Schemes indicate development type and extent, design, transportation infrastructure, provision of services on the site, proposals to minimise the effects of development and the amount of community facilities required to serve development. Each Planning Scheme carefully phased development to take place in tandem with or ahead of development.</p> <p>Strategic Development Zones operate independently of the Development Plan, however development would be cognisant of environmental constraints and bound by issues contained within the Water Framework Directive. Strategic Environmental Assessment (SEA) was part of the process of the Clonburris Strategic Development Zone (SDZ) Planning Scheme.</p> <p>Noted. These consultations were undertaken prior to the release of the Draft Plan for public consultation.</p> <p>Noted. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the Draft Plan (as required by Annex I of the SEA Directive, (g) are detailed in chapter 9 of the Environmental Report and introduced as policies, objectives or additional text in the Draft Plan. A full description of the measures envisaged to monitor the Plan (as required by Annex I of the SEA Directive, (i) is contained in chapter 10 of the Environmental Report. A summary of both aspects is contained in the Non Technical Summary.</p> <p>Noted. Please see section 9 of the Environmental Report. The location of each mitigation measure within the Draft Plan is indicated</p>
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<p><u>Assessment of Environmental Affects</u> In assessing the likely significant effects of the Plan the full range of effects, as set out in Annex I of the SEA Directive - "<i>secondary, cumulative, synergistic, short, medium and long term, permanent, temporary, positive and negative effects</i>", should be assessed and reported on.</p> <p><u>Mitigation Measures</u> Where mitigation measures are proposed, a clear commitment to implement the necessary proposed mitigation measures should be included in the Plan. Those mitigation measures which have not, to date been included in the Draft Plan, should be reviewed and addressed in the final Plan as appropriate.</p> <p><u>Monitoring Measures</u> Any significant gaps identified in environmental data during the environmental assessment process should be highlighted, and proposals for addressing these data gaps put forward.</p> <p>The Monitoring Programme should be flexible to take account of the various stages of the Plan and should be able to deal with specific environmental issues as they arise. The programme must be able to deal with the possibility of cumulative effects.</p> <p>There would be merits in including a commitment to oversee the implementation of mitigation measures and monitoring programme. There may be merits in establishing a Steering Committee tasked with these responsibilities.</p>	<p>Noted. The potential influence of the Plan on the environment outside the Plan area is a consideration throughout the Environmental Report. In the consideration of alternatives, Alternative 1:Environmental/Preservation scenario, there are negative impacts indicated outside the County, this resulting from the displaced development. Assessment of the policies and objectives specifically concentrated on how development within the County would affect adjacent counties. The possible impacts on the Natura 2000 environment in adjoining counties are dealt with in the Habitat Directive Screening document.</p> <p>Please refer to appendix 1 of the Environmental Report. This appendix contains a full assessment of the range of effects of policies and objectives.</p> <p>Noted. Please see section 9 of the Environmental Report. The location of each mitigation measure within the Draft Plan is indicated.</p> <p>Section 2.9 of the Environmental Report notes the data gaps encountered in compiling the report. The Draft Plan contains measures to fill in these data gaps including; LHA1 (4.3.5.i) Preservation of Landscape Character, LHA9 (4.3.7.vii) Impacts on Natura 2000 sites, LHA15 (4.3.7.viii) Heritage and Biodiversity Plan, WD13 (2.3.22.i) Risk of Flooding, WD14 (2.3.34.i) Identified Flood Risk Areas and WD15 (2.3.26.i) Flood Risk Assessment and Management Plans</p> <p>A specific form of GIS based monitoring, to be undertaken in tandem with the assessment of planning applications is to be used in order to provide up to the minute data regarding the implementation of the Strategic Environmental Objectives. This will allow for faster reaction to the cumulative</p>
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	<p>impact of the development proposals.</p> <p>Noted. Section 10.6 of the Environmental Report contains this recommendation.</p>
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SEA Specific Issues Raised in Non-Statutory Submissions

<p>Submission numbers 105 137 138 144 Do not believe that the SEA conducted meets with the statutory requirements and will need to be substantially revisited before the process can be successfully concluded legally</p>	<p>The SEA Environmental Report complies with the requirements of the SEA Directive (Directive 2001/42/EC of the European Parliament and of the Council of Ministers, of 27 June 2001, on the assessment of the effects of certain plans and programmes on the environment) as transposed into Irish Law through the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (Statutory Instrument Number (SI No.) 435 of 2004) and the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (SI No. 436 of 2004).</p> <p>The Strategic Environmental Assessment of the Draft Plan was undertaken in tandem with the Development Plan process. The Implementation of SEA Directive document published by the Department of the Environment, Heritage and Local Government (DoEHLG) was consulted extensively as were the required statutory bodies. None of the submissions from the statutory bodies, specifically the EPA or DoEHLG, noted any irregularities regarding the Strategic Environmental Assessment.</p>
<p>Submission Numbers 105 137 138 Absence of a Biodiversity Action Plan and other Biodiversity Studies and flood assessment are major deficiency- County Plan cannot be considered in the absence of these and other matters.</p>	<p>It is acknowledged in Section 3.3.8 of the Environmental Report that a lack of Biodiversity or Habitat Plan for the county constrains assessment at local level. The Biodiversity Plan is a requirement of the Draft Plan (LHA15 Section 4.3.7.xiii). The Biodiversity Plan is also an action of the Draft County Heritage Plan and it is intended to undertake a county habitat survey during the course of 2010.</p> <p>Section 2.3.25 of the Plan notes that recommendations and outputs from the Dodder and Liffey CFRAMS process will be incorporated into the Development Management process. This will ensure that long term strategies and programmes for flood risk management will be implemented on an ongoing basis. It is recommended that attention be drawn to the CFRAMS flood extent maps and the "alluvial soils" floodplain maps by means of a SLO located alongside the potential flooding areas;</p> <p>Recommendation SLO: The areas of flooding potential as indicated in the Dodder Catchment Flood</p>

<p>Submission Number 105 Disagree with the position that appropriate assessment does not require a stage 2 assessment – formal request for such and screening matrix to be made available – legislatively required</p> <p>Submission Number 105 Lack of formalised assessment of areas of ecological significance- inaccurate picture of the ecological sensitivities of the County and compromises the intent of the Appropriate Assessment-doesn't account for cross county considerations.</p> <p>Submission Number 164, 283 It is noted that the screening report templates provided for by the European Commission in their guidance document on Appropriate Assessment have not been used.</p> <p>Submission Number 154 Serious reservations about the quality of assessment undertaken, and the gaps and deficiencies in the underlying information and studies including population considerations, flooding and biodiversity and climate change.</p>	<p>Risk Assessment Management Study (CFRAMS) and the OPW “alluvial soils” floodplain maps are to be taken into account along with the requirements of Section 5 of The Planning System and Flood Risk Management Guidelines (November 2009) when assessing planning applications, with a view to restricting or, if necessary, refusing development proposals within such areas in order to avoid flooding events.</p> <p>The Habitat Directive requires an initial Screening Study to establish whether or not a full Stage 2 Appropriate Assessment is necessary. The results of this screening concluded that the second stage was not required. The Screening Matrix and Report have been available on the Council website from the time that the Draft Development Plan was put on public display.</p> <p>Submissions from the National Parks and Wildlife Services, the DoEHLG, EPA and Eastern Regional Fisheries Board established areas of ecological significance. These are also detailed within the site synopsis of the pNHAs and cSACs within the Environmental Report. Section 4.8 of the Implementation of SEA Directive Guidelines notes that the Environmental Report is part of a hierarchy of assessment procedures, and that more detailed issues would be considered at local area plan or EIA level.</p> <p>The Appropriate Assessment Screening was undertaken using a template arising from a Heritage Training seminar on 26th February 2009 attended by NPWS. Following the subsequent production in December 2009 of the NPWS's detailed guidance document on Appropriate Assessment, the SDCC Screening document was reassessed and no amendments to the outcome of the screening process are deemed to be necessary.</p> <p>The most up to date information available was recorded in the baseline. The Draft Flood Management Guidelines, the Draft Dodder CFRAMS, alluvial soil surveying, the Green City Guidelines, and the information gathered as part of the Heritage Plan process all informed the environmental report. Every effort was undertaken to minimise gaps in</p>
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	<p>information. Where information gaps remained, these were noted within the individual sections regarding each section of the baseline. Section 4.8 of the Implementation of SEA Directive Guidelines states that the '<i>SEA involves collating currently available, relevant environmental data; it does not require major new research. Where data deficiencies or gaps exist, this should be acknowledged in the report</i>'.</p>
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Recommendation Summary

The following recommendations are proposed to the text within the Draft Plan.

LHA19: (4.3.7.xvii) Flora and Fauna.

Recommendation: In conjunction with the NPWS, the Council will require impact assessment of proposed development in Brittas and Aghfarrell on the feeding areas of protected Greylag Geese.

Policy **LHA 19:** (4.3.7.xvii) Flora and Fauna

Recommendation: The Council will help ensure that any *E.U and Nationally* protected species are not placed under further risk of reduction in population size. (italics shows new wording)

SLO 7.

Recommendation: **SLO 7.** Encourage and facilitate the sensitive and selective lighting of key buildings and structures in Lucan Village such as Churches and the Liffey Bridge. **The design of any proposed future lighting of the Liffey Bridge shall be subject to assessment of the impact of lighting on bat roosting, hunting and movements.**

Section 2.3.9

Recommendation: Amend Section 2.3.9 (7th overall bullet point) to require in developments adjacent to watercourses, that any structure must be set back a minimum distance of 10m from the top of the bank to allow access for channel cleaning and maintenance, unless otherwise agreed with the Planning Authority. **This may be increased depending on the size of the watercourse and any particular circumstances.**

Policy LHA20 Section 4.3.7.xviii

Recommendation: Amend 4.3.7.xviii Policy LHA20 first bullet point to read "Dedicate a minimum of 10m each side of the waters edge for amenity, biodiversity and walkway purposes where practical; **this may be increased depending on the size of the watercourse and any particular circumstances;**

Section 1.2.53 Living Place, Housing, Domestic Effluent Policy.

Recommendation: On sites where a treatment plant is proposed, the treatment plant and the percolation areas shall comply with the requirements of **the Code of Practice on Wastewater Treatment and Disposal Systems serving Single Houses (October 2009)**

Section 2.2.37 Road Objectives.

Recommendation: Minimise the impact of the construction and operation of roads and watercourse crossings on fish and their habitat and other wildlife habitats, e.g. crossing points for badgers etc., through consultation with appropriate authorities, **and through**

implementing 'Requirements for the Protection of Fisheries Habitat during the Construction and Development Works at River Sites'.

Section 0.4.4

Recommendation

Alter heading of Section 0.4.4 from "Environmental Impact Assessment" to "Environmental Assessment", introduce "Environmental Impact Assessment" as Section 0.4.4.1 and "Strategic Environmental Assessment", as Section 0.4.4.2

Section 0.4.4.2: Strategic Environmental Assessment

The Council is committed to ensure full compliance the SEA Directive (Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment) as transposed into Irish Law through the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (SI No. 436 of 2004).

Policy **WD5** (2.3.12.i) Water Quality Management Plans.

Recommendation: and in accordance with the policies and objectives and programme of measures of the Eastern River Basin Management Plan ~~when adopted~~ **and any future amendments.**

Floodplain SLO to be indicated on Development Plan Maps located alongside the potential flooding areas;

SLO: The areas of flooding potential as indicated in the Dodder Catchment Flood Risk Assessment Management Study (CFRAMS) and the OPW "alluvial soils" floodplain maps are to be taken into account along with the requirements of Section 5 of The Planning System and Flood Risk Management Guidelines (November 2009) when assessing planning applications, with a view to restricting or, if necessary, refusing development proposals within such areas in order to avoid flooding events.

Policy **WD2** (2.3.8.i) Wastewater Treatment Plants and Wastewater Collection Systems.

Recommendation: The relevant text within section 2.3.8.i is to be updated to state 'A report for the years 2006 and 2007'.

Recommendation: On sites where a treatment plant is proposed, the treatment plant and the percolation areas shall comply with the requirements of **the Code of Practice on Wastewater Treatment and Disposal Systems serving Single Houses (October 2009)**

Drinking Water (2.3.5)

Recommendation: Update section 2.3.5 Water Supply and Drainage of the Draft Plan to replace 'A Report for the Years 2006-2007' with A Report for the Years '2007-2008'.

Policy LHA19 (4.3.7.xvii) Flora and Fauna

Recommendation: It is recommended that wording be inserted into explanatory text of Policy LHA19 (4.3.7.xvii) Flora and Fauna "requiring a programme to monitor and restrict the spread of invasive species such as those located along the River Dodder"

Policy **LHA9** (4.3.7.vii) Impacts on Natura 2000 sites

Recommendation: Replace 'where relevant, projects will be screened', with 'projects noted within the National Parks and Wildlife Service *Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities* (December 2009) document will be screened'.

The Draft Plan includes provision for the screening of Natura 2000 sites (4.3.7.vii, final paragraph)

Recommendation: replace 'arising from this plan will' with 'arising from this plan and proposed amendments to the adopted plan will'

Section 4.3.7 vii

Recommendation

The Council will fulfil the requirements of the National Parks and Wildlife Service *Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities* (December 2009) for projects and plans.

LHA15 (4.3.7.xiii) Heritage and Biodiversity Plan

Recommendation: replace following text within LHA15 (4.3.7.xiii) Heritage and Biodiversity Plan, 'prepare a County Biodiversity Plan following public consultation' with 'prepare a County Biodiversity Plan following public consultation and within the lifetime of the Plan'.

Integration of Environmental Considerations in the Development Plan

Recommendation: Amend title for Section 0.3 from " National, Regional and Local Policy Context for the Preparation of the Development Plan" to " National, Regional, Local and Environmental Policy Context for the Preparation of the Development Plan"

Recommendation: Amend title for Section 0.3.22 from "Strategic Environmental Assessment" to "Environmental Policy Context" and include text as follows;

Section 0.3.22 Environmental Policy Context

There are two EU Directives that require the assessment of the Development Plan in terms of its impact on the environment. These are the SEA Directive and the Habitats Directive.

Strategic Environmental Assessment (SEA) is a formal process, involving the systematic evaluation of the likely significant environmental effects of implementing a plan or programme before a decision has been made to adopt it. The assessment is undertaken in accordance with the EU SEA Directive (Directive 2001/42/EC) and the Planning and Development (Strategic Environmental Assessment) Regulations 2004. SEA is a valuable tool that will influence decision-making at each stage in the County Development Plan Review process, will improve the overall environmental sustainability of the new Plan and will raise awareness of the potential environmental consequences of its implementation so that these consequences may be mitigated or avoided altogether. It also gives the public and other interested parties an opportunity to comment and to be kept informed.

The 'Habitats' Directive (Directive 92/43/EEC) requires that an "appropriate assessment" be undertaken for any plan or project that is likely to have an impact on a Natura 2000 site *i.e.* a Special Area of Conservation (SAC) or a Special Protection Area for Birds (SPA). There are two SACs located in the Dublin Mountains area of South Dublin County: Glenasmole Valley and that part of the Wicklow Mountains SAC that extends across the border into South Dublin County. There are currently no SPAs designated for the County. In effect, the Directive requires South Dublin County Council to undertake an appropriate assessment of the ecological implications of the Development Plan proposed on Natura 2000 sites both within and outside the County.

A short account of the two assessment processes, their key findings and of how they were integrated into the Plan preparation are outlined in Appendix --.

Appendix –

Strategic Environmental Assessment

A Strategic Environmental Assessment which is a formal, systematic evaluation of the likely significant environmental impacts of a proposed plan or programme is being undertaken in parallel with the production of the Draft County Development Plan. The assessment is undertaken in accordance with the SEA Directive (Directive 2001/42/EC of the European Parliament and of the Council of Ministers, of 27 June 2001, on the assessment of the effects

of certain plans and programmes on the environment) as transposed into Irish Law through the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (SI No. 436 of 2004).

The intention of the SEA process is to provide a clear understanding of the likely environmental consequences of decisions regarding the future accommodation of growth in South Dublin County Council. This 'assessment' process is a key mechanism in promoting sustainable development, in raising awareness of significant environmental issues in the South Dublin County Council area and in ensuring that such issues are properly addressed within the capacity of the planning system. The results of the SEA are recorded in the Environmental Report which should be read in conjunction with the South Dublin County Development Plan.

The aim of the Environmental Report is to identify specifically:

- The current state of the environment and the existing environmental issues in the South Dublin area
- The likely significant effects on the environment of the Plan's policies and objectives
- How any negative impact on the environment can be reduced or prevented and
- How to monitor environmental impacts over the lifetime of the Development Plan

The environmental receptors which are examined in the Environmental Report are as follows:

- Biodiversity / flora and fauna
- Population / Human Health
- Geology / Soil
- Water
- Air
- Climate
- Material assets
- Cultural Heritage/ Landscape

The key environmental issues in the South Dublin County area have been identified as:

- Depopulation in Older Areas/Growth at edge of the developed area on greenfield land
- Pressure on Designated Nature Sites (SAC's, pNHA's, SAAO)
- Loss of Landscape Character particularly in the Uplands
- Need to improve the status of water bodies (Water Framework Directive)
- Identifying Potential Flooding areas
- Traffic Noise and Movement
- The presence of 3 Seveso Sites in the County
- Deficiency in water supply and waste water infrastructure at regional level
- Transport – South Dublin the lowest % of people travelling to work/school by Bus/ Luas/ Dart
- Climate Change and how it is influenced by the Growth of Traffic

The following Gaps in the Baseline environmental information have been identified in the report

- The lack of a Biodiversity Plan
- An incomplete Landscape Character Assessment
- A lack of information regarding floodplains and flood risk areas.

The evaluation of the likely environmental consequences of a range of alternative strategies for accommodating future development in the South Dublin area is part of the SEA process. The scenarios as outlined below provide alternative visions of how the future development of South Dublin might occur.

Scenario 1 Environmental / Preservation Approach

Scenario 2 Sustainable/Selective Concentration

Scenario 3 Weak Planning/Market-led Growth

Scenario 4 Combination of Reactionary Planning and Market-led Approach

Following evaluation, the Sustainable/Selective Concentration scenario was identified as the best means of continuing to accommodate and control growth in the South Dublin County Council area while providing for environmental protection and enhancement. The County Development Plan that has emerged from the Plan preparation process has a close correlation to this scenario.

The assessment of the policies and objectives of the County Development Plan in the Environmental Report has identified a range of measures that require mitigation to prevent, reduce and, as fully as possible, offset any significant adverse impacts on the environment of implementing the Development Plan. The principal mitigation measures are in the areas of Biodiversity, Water Protection, Flooding and Landscape.

The SEA Directive requires that the significant environmental effects of the implementation of plans and programmes are monitored. The Environmental Report puts forward proposals for monitoring the Development Plan which are adopted alongside the Plan. Monitoring enables, at an early stage, the identification of unforeseen adverse effects and the undertaking of appropriate remedial action. In addition to this, monitoring can also play an important role in assessing whether the Development Plan is achieving its environmental objectives and targets - measures which the Development Plan can help work towards - whether these need to be re-examined and whether the proposed mitigation measures are being implemented.

A preliminary monitoring report on the effects of implementing the Development Plan will be prepared within two years of the making of the plan. The Council is responsible for the collation of existing relevant monitored data, the preparation of a monitoring report, the publication of this report and, if necessary, the carrying out of corrective action.

Appropriate Assessment

Introduction

Article 6(3) the 'Habitats' Directive 92/43/EEC requires that an "appropriate assessment" be undertaken for any plan or project that is likely to have an impact on a Natura 2000 site *i.e.* a Special Area of Conservation (SAC) or a Special Protection Area for Birds (SPA).

In effect, Article 6 (3) requires a robust and thorough application by all consent authorities, including planning authorities, of the requirement to undertake an appropriate assessment of the ecological implications of any plan or project, whether within or outside of a designated site, which may impact upon its stated conservation objectives. The impacts assessed must also include the *cumulative* impacts of approving the plan, considered with any current or proposed activities impacting on the site.

The procedure is a two-step process, involving an initial screening of the plan or project to determine the likelihood of potential impacts arising from the plan and then when necessary, a second step involving a process of appropriate assessment where a potential impact has been determined during the screening process which cannot be avoided or mitigated against. This second stage essentially requires an expert ecological assessment of the potential impacts of the plan on the listed conservation objectives of the protected site.

There are two SACs located in the Dublin Mountains area of South Dublin County: Glenasmole Valley (Site Code 1209) and that part of the Wicklow Mountains SAC (Site Code 2122) that extends across the border into South Dublin County. There are currently no SPAs designated for the County.

Screening of the draft County Development Plan

The draft Development Plan was subjected to an initial screening process with the objective of determining if any of its policies or objectives were likely to have a significant effect, alone, or in combination with other plans, on a protected Natura 2000 site occurring either within, adjacent to, or downstream of the County

A number of draft Development Plan policies and objectives relate to the protection of Natura 2000 sites and to the area of the uplands where the two SACs are located (see LHA 1, LHA 2, LHA 6, and LHA 7). These policies, particularly in combination with one another, offer considerable protection to this area of the County and hence, to the two Natura 2000 sites.

The results of the appropriate assessment screening process concluded that there were no projects in the draft plan that would give rise to significant adverse direct, indirect, or secondary impacts on the integrity of any Natura 2000 sites *within* the area of the plan.

Possible '*in combination*' impacts were also investigated by assessing other current or likely plans or projects for this area of the Dublin Mountains which could have a cumulative impact on the two SACs located there. With the range of policies applying to the area as listed above and following the strengthening of Policy H33 in relation to the provision of housing in the uplands area, no impacts were deemed likely to result from the cumulative effect of the draft Development Plan and other plans or projects.

Finally, the Habitats Directive requires that the screening process must also consider impacts that are likely to arise on Natura 2000 sites *in the proximity* of the County by virtue of any plan or project implemented within the County itself. This is also taken to include potential downstream effects of the plan. This therefore required an assessment of potential impacts on SACs and SPAs located in adjacent County Wicklow (Wicklow Mountains SAC and Poulaphouca Reservoir SPA) and also those Natura 2000 sites located downstream of South Dublin County in Dublin Bay (North Dublin Bay SAC, South Dublin Bay SAC, North Bull Island SPA, and South Dublin Bay and River Tolka Estuary SPA).

The screening process concluded that there were no projects in the draft County Development Plan, either individually or in combination with other plans or projects, which would give rise to significant adverse direct, indirect, or secondary impacts on the integrity of the two Natura 2000 sites located in County Wicklow.

In relation to the assessment of downstream effects, poor water quality originating within South Dublin County and entering Dublin Bay, in conjunction with the inputs from the three other Dublin Local Authorities of Fingal, Dublin City, and Dun Laoghaire-Rathdown, is deemed to be the main potential threat to the conservation objectives of the Dublin Bay Natura 2000 sites. The Dublin City water treatment facility is subject to separate operational consent and licensing procedures and it is required to be compliant with all applicable environmental Regulations and Directives, including the Water Framework and Habitats Directive.

The draft South Dublin County Development Plan contains a number of objectives and policies relating to water quality, waste water treatment, and river and stream management (e.g. WD 1, WD 2, WD 5, LH 18), all of which aim to eliminate or reduce the potential for deterioration of water quality. Many of these policies involve the co-operation of adjoining Counties in a broader, strategic approach to dealing with water quality issues. These policies will, together, facilitate monitoring of changes in water quality and aquatic habitats, and assist in the preparation of landscape improvement schemes for existing rivers and streams. With the implementation of these and other related policies and mitigation measures, any current downstream impact on the Dublin Bay Natura 2000 sites will continue to diminish and any future plans will be rigorously assessed to ensure that there will be no additional negative impacts on water quality leaving the County.

Conclusions

The draft County Development Plan was subjected to screening for Appropriate Assessment as required under Article 6 (3) of the Habitats Directive. The Plan has generally been formulated to ensure that uses, developments, and effects arising from permissions based upon the Plan (either individually or in combination with other plans or projects) shall not give rise to significant adverse impacts on the integrity of any Natura 2000 sites either within, adjacent to, or downstream of the County.

The appropriate assessment procedure for the draft County Development Plan was therefore concluded at the screening stage and a detailed Stage 2 assessment was not required.

Next Stage in the SEA Process

The submissions from the Environmental Authorities and the non-statutory submissions received as part of the public consultation exercise will inform amendments to policies, objectives and strategy within the Draft Plan as recommended in the Manager's Report.

Proposed amendments to the Plan recommended by the Elected Members at this stage will be assessed for environmental impact. Any adopted amendments which propose to materially alter the Plan will be put on public display to allow for further comment. An environmental assessment of any proposed variation will be part of this display.

PART THREE

- 6. List of bodies consulted**
- 7. Summaries of the main issues raised in the submissions/observations on the Draft Development Plan**
- 8. Recommended Changes Draft County Development Plan**

6. List of bodies consulted

Planning Section, Department of Education Railway Procurement Agency Acquisitions Dept, University of Limerick National Library Council of Ireland Department of Defence Architectural Library, UCD An Taisce - The National Trust for Ireland IDA Ireland National Roads Authority Irish Aviation Authority Aer Rianta Eastern Regional Fisheries Board Forfás South Western Area Health Service Executive The Heritage Council Sustainable Energy Ireland The Central Fisheries Board Health Service Executive Health and Safety Authority Bord Failte Eireann Dublin City Council Dun Laoghaire Rathdown County Council Kildare County Council Fingal County Council Wicklow County Council Office of Public Works South East Regional Authority Dublin Regional Authority Border Midland & Western Regional Assembly Dublin Transportation Office The Arts Council Mid East Regional Authority Midland Regional Authority Southern & Eastern Regional Assembly	The South Dublin County Development Board Fás Headquarters Environmental Protection Agency Acquisitions Dept, Trinity College Library Dublin Bus Quality Bus Network Office Irish Rail An Taisce, South Co. Dublin Assoc. Tanaiste & Minister for Enterprise, Trade and Employment Minister for Agriculture, Fisheries and Food Agriculture House Minister for Communications, Energy and Natural Resources. Minister for Community Rural & Gaeltacht Affairs. Minister for Education and Science Minister for Health and Children Minister for Transport and Marine Minister of Arts, Sports & Tourism Minister of Defence. ESB- Property Planning Manager ESB Head Office Bord Gáis Eireann An Garda Siochana Spatial Policy Section, Department of Environment, Heritage and Local Government Development Applications Unit, Department of the Environment, Heritage & Local Government An Bord Pleanála The Commission for Energy Regulation Commission for Communications Regulations
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7. Summaries of the main issues raised in the submissions/observations on the Draft Development Plan

2 Summary of Issues Raised

2.1 1 A Busy Place

2.1.1 1.1 Enterprise and Employment

1. Facilitate Gateway/Landmark type building and mixed use development at Naas Road ()
2. Density standards in the Naas Road Area Development Framework ([Draft0005](#))
3. There is a number of vacant commercial units within the Liffey Valley Centre, and at Rowlagh, Neilstown and Quarryvale. ([Draft0024](#))
4. Do not consider that the proposed new zoning objective for Enterprise Priority One Zoned Lands or policy EE10 can be adopted before the Draft Nass road Framework is amended and re-consulted with the public. ([Draft0048](#))
5. Would like the Plan to contain a clear cross referencing of policies between the various chapters that affect Tourism and the specific Tourism chapter. ([Draft0014](#))
6. Requests more reference to other documents or bodies concerned with Tourism and the need for close working relationships to be included in the Plan. ([Draft0014](#))
7. Would like the inclusion on the following policies:
 - Promote and foster a growing sense of innovation and entrepreneurship in the tourism sector.
 - Encourage and support increased coordination, cohesion and linkages between agencies such as Failte Ireland and Dublin Tourism, Waterways Ireland, the Regional Fisheries Board and the Dublin Regional Authority.
 - Protect the natural resources upon which tourism is based through the enforcement of policies in relation to resource protection; landscape character assessment; architectural conservation areas; bogs; water quality; biodiversity; rural housing development.
 - Require applications for new tourism development to be assessed against a sustainable tourism planning checklist.
 - Evaluate public transport provision and where appropriate provide support for alternatives to the use of private cars to access visitor attractions.
 - Investigate and support best-practice environmental management including energy efficiency, waste management including energy efficiency, waste management, procurement and recycling in accommodation providers and tourism enterprises in the County. ([Draft0014](#))
8. Request that an enterprise centre and a craft centre be established in the Brittas area. ([Draft0071](#))
9. Request that tourist amenities including a tourist trail and enjoyment of the Brittas Ponds be developed and promoted. ([Draft0071](#))
10. Oppose extensions to local quarries. ([Draft0071](#))
11. Concern relating to industrial zoning where it is proposed to introduce a new element into this zoning designation whereby Offices over 1,000 sq.m are not permitted ([Draft0103](#))
12. EP2 zoning is contrary to the Masterplan for Profile Park lands. ([Draft0121](#))
13. Request at Site of Woodies, Naas Road/Long Mile Road should have plot ratio of 2.5 and in the interest of urban design at least a six storey corner feature ([Draft0104](#))
14. Request Ensure by way of a policy statement that corner sites in the area should have feature landmark developments and a specific objective should designate this site as being appropriate for such development. ([Draft0104](#))
15. Support given for the separation of the Enterprise Priority Zoning into three categories as it is compatible with the policy of the DTO. ([Draft0098](#))
16. Recommends that no further zoning for enterprise and employment should occur until it is demonstrated that there is insufficient enterprise and employment zoned land in the County. ([Draft0098](#))
17. States that the County road network has not been defined within the draft Development Plan and therefore requests that Policy EE5, which relates to the road network, be clarified. ([Draft0098](#))

18. The Plan should contain a specific acknowledgement of the potential impact of rural housing on the exploitation of natural resources in Sections 3.2.18 and the Rural Housing Section. ([Draft0100](#))
19. Support for Section 3.2 and particularly Section 3.2.18. ([Draft0100](#))
20. Support for Policy EE37. ([Draft0100](#))
21. Section 3.2.18, regarding the commitment to restrict incompatible development that would interfere with the efficient development of resources should be strengthened into a formal policy such as EE38. ([Draft0100](#))
22. The following guidelines should be noted in the Plan: The Quarry Planning Guidelines, the ICF Environmental Code of October 2005; DEHLG/ICF Archaeological Code of Practice; GSI/ICF Guidelines for Geological Heritage; NPWS Guidance on Biodiversity. ([Draft0100](#))
23. There should be a requirement to submit more imaginative restoration plans. ([Draft0100](#))
24. Requests that less exhaustive reports be requested with regards to Architectural Heritage and the impact of a quarry development. ([Draft0100](#))
25. While quarries are a temporary use of the land, the term of usages will generally be upwards of 20 years and the planning permission should be for a term commensurate with the extraction period. This should be noted within the second last point in Section 3.2.5. ([Draft0100](#))
26. Road contributions should be based on a balance on impact of all road users so as not to unjustly penalise an authorised quarry development. ([Draft0100](#))
27. Believes that the necessity for further rezoning of agricultural lands for industrial use in the west of the County contradicts Section 3.2.2 of the Draft Plan. ([Draft0107](#))
28. Believes that Policy EE30 is incompatible with the rezoning of agricultural land for industrial purposes. ([Draft0107](#))
29. Welcome Policy EE39 of the Draft Plan. ([Draft0129](#))
30. Request that the 2010-2016 plan should also include an objective to facilitate the regeneration of the Naas Road Corridor and provide for a more intensive mix of urban uses which capitalise on the excellent public transport accessibility. ([Draft0163](#))
31. The only areas that have been zoned EP1 are adjacent to Tallaght Town Centre and two areas with existing industrial buildings on the Longmile Road and at Ballymount neither of which is established as an office location. Demand patterns for offices have shown that businesses seek to locate in high quality business campuses such as Citywest. ([Draft0200](#))
32. In accordance with the objectives of the existing 2004-2010 County Development Plan, it is submitted that the 2010-2016 County Development Plan should also include an objective to facilitate the regeneration of the Naas Road corridor and provide for a more intensive mix of urban uses which capitalise on the excellent public transport accessibility. The opportunity exists to provide for significant elements of housing, employment and community uses that meet the needs of the expanding Dublin Metropolitan area in a highly sustainable manner. ([Draft0191](#))
33. SDCC should consider and recognise the potential for commercial and industrial development alongside the existing commercial, industrial and/or mixed use residential sites and start to make provision for the servicing and infrastructural links to these existing and developing sites and facilities. ([Draft0237](#))
34. SDCC must ensure that strategic development plan policies accommodate economic growth rather than restrict it. ([Draft0237](#))
35. South County Council should adopt positive employment creation policies that will support and secure future development, generating additional economic benefit for the County. ([Draft0237](#))
36. Seek clarification of wording of zoning objective EP1 in order to ensure development is not delayed in the absence of 'approved plans' ([Draft0249](#))
37. Seek clarification on the restriction of residential development on lands zoned objective EP1 in the absence of a LAP ([Draft0249](#))
38. Request the amendment of the definition of brownfield lands in accordance with the definition used in current National Guidance. ([Draft0249](#))
39. Local Zoning Objective 5 'N7 Gateway Corridor Upgrading' be retained in the new Development Plan insofar as it relates to the area extending from Newlands Cross to the M50 Interchange; ([Draft0169](#))

40. Revise zoning Objective EP1 ([Draft0170](#))
41. EP2 zoning be amended to allow for Offices in excess of 1,000 sq.m to be 'open for consideration'. ([Draft0171](#))
42. Also that Policy EE39 be amended to add the words "...and unzoned land be considered for rezoning." To the end of the policy statement. ([Draft0190](#))
43. Request that Policy EE39 be amended to read: It is the policy of the Council to again negotiated with the Department of Defence with the aim of reducing the no development restriction area at Baldonnell Airport to that of norm at international airports generally, thus allowing some currently zoned lands to be opened up for use and unzoned land to be considered for rezoning. ([Draft0228](#))
44. Request that Plan include a policy under the 'Enterprise Theme' to indicate its support for the provision of secure, efficient and high quality energy supply in the County. ([Draft0233](#) [Draft0234](#))
45. Support for Policy EE39. ([Draft0244](#))
46. Request that there be only two Enterprise and Employment Zones (EP1 and EP2). ([Draft0244](#))
47. Request that the logistics/depot function of EP2 lands is protected/enhanced to ensure that such lands are developable. ([Draft0250](#))
48. Request that the existing uses on enterprise and employment zoned land should be facilitated under the proposed EP2 zoning. ([Draft0250](#))
49. Support for Policy EE16. ([Draft0250](#))
50. Objects to the limiting of large office developments to only brownfield EP1 zoned lands as it will make the county less competitive in attracting future corporate and Foreign Direct Investment. ([Draft0251](#))
51. Policy EE27 should be amended to indicate that Citywest Campus will be a designated location for 'Major Leisure Facilities. ([Draft0262](#))
52. Section 3.2.16 – Agriculture The following should be included: 'To consider land use and agriculture in a new light since the introduction of the Single Payments Scheme....' ([Draft0018](#))
53. EE36 The following should be added: 'Prohibit any development which would impinge on a public right of way or walking route. ([Draft0018](#))
54. Support for Policy/Section EE29 ([Draft0018](#))
55. The large areas of agricultural land proposed to be rezoned to industrial conflict with Policy EE30. The Council should be actively seeking to promote the commercial growing of food locally, in the interest of sustainable local employment, wider food sustainability and security issues and the environment. ([Draft0158](#))
56. Policies EE39, & EE41 should be removed as there is plenty of industrial zoned land in the county and if the Council zones land for development in the restricted zone and then it cannot be developed, that is not the fault of the Department of Defence as it is a military airport. Promoting an increase in civilian air transport is contrary to national and international aims to reduce greenhouse gas emissions, and would also detract from the amenity value of the Dublin Mountains and other leisure and recreational facilities in this area ([Draft0158](#))
57. Major Accidents Directive ([Draft0285](#))

2.1.2 1.2 Retail

1. Request that the section concerning Discount Foodstores be modified to include a statement of recognition that Retail Parks are appropriate locations for Discount Foodstores because of the synergistic effects of these types of retailing and the resultant multi purpose trip generation achieved. ([Draft0140](#))
2. Request that the benefits of Discount Foodstores to competition in the convenience retail sector and the consequential benefits that accrue to the consumer be acknowledged in the Development Plan. ([Draft0140](#))
3. Request that the Council ensures that sufficient appropriately zoned lands exist for the construction of additional discount foodstores in the County. ([Draft0140](#))
4. It is respectfully submitted that Clonburris should be designated as a Level 2 Major Town Centre in accordance with the Inspector recommendations on the Clonburris SDZ Planning Scheme or at least a Level 3- Town Centre. ([Draft0225](#))
5. Request a single off-licence for a population of no more than 10,000. ([Draft0245](#))

6. Request that the location and scale of retail facilities be determined by an assessment of floorspace need and qualitative benefits such as improved accessibility. ([Draft0250](#))
7. Section 3.4.3.iv Request clarification whether the references to Local Centres refer specifically to the map based 'Local Centre' zoning objective. The map based local Centre Zoning objective would have significantly greater levels of existing floorspace. ([Draft0250](#))
8. Section 3.4.3.iii Request clarification on the location of specific Neighbourhood Centre zoning and why foodstores in excess of 1,500m² are permitted here and not within Local Centres. ([Draft0250](#))
9. Request that Rathfarnham Shopping Centre and Hillcrest Shopping Centre be upgraded to District Centre or a more flexible zoning to facilitate their future development. ([Draft0250](#))
10. Request that more District Centres be designated within the Plan: Local Centres that have significant levels of existing retail floorspace and that are in need of rejuvenation should be upgraded to 'District Centres'. At the very least provision should be made for a scale of development between Local Centres and District Centres. ([Draft0250](#))
11. Policies should not seek to promote discount foodstores only and should in fact show preference to convenience foodstores, particularly, as the product range associated with same facilitates the 'weekly shop'. ([Draft0250](#))
12. Section 3.4.3.v No information has been provided indicating the assessment criteria to be 'considered' by the planning authority. This policy may not be implementable without amendments being made to the zoning matrix. ([Draft0250](#))
13. Support for Section 3.4.6 of the Plan. ([Draft0250](#))
14. Policy S20 Request for a degree of flexibility for seasonal peaks such as during the Christmas period. ([Draft0250](#))
15. Policy S22 Request that the specific location of the alcohol sales area within a convenience retail unit should not be restricted to a 'designated' location. ([Draft0250](#))
16. Support for Policy S29. Request that the Planning Authority promote the co-location of larger convenience foodstores and petrol filling stations, as recognised in the Retail Planning Guidelines. ([Draft0250](#))
17. Request more signage directing people to industrial estates. ([Draft0288](#))
18. States that there is a discrepancy in the urban and retail hierarchy where centres such as Palmerstown, in reality, fall between the definitions of a District Centre and a Local Centre (as it is designated). Request a new retail level that sits between Local Centre and District Centre. ([Draft0118](#))
19. Consideration should be given to amending Policy S39 to include "where they act as a barrier to views to landmarks". ([Draft0254](#))

2.1.3 1.3 Town, District and Local Centres

1. There is a large amount of vacant properties, retail outlets, factories and apartments in Tallaght ([Draft0025](#))
2. Request that no more apartments be development in Tallaght area especially over four stories ([Draft0025](#) [Draft0065](#) [Draft0101](#) [Draft0110](#) [Draft0111](#) [Draft0112](#) [Draft0115](#))
3. Object to any further apartment development in Tallaght ([Draft0056](#))
4. Set up a unit to liaise with all owners of property in Tallaght Town Centre, Including Nama re: security, taking in charge, transfer of property to the Council etc ([Draft0032](#))
5. Objection to further residential development on west side of Rathcoole- in close proximity to L Behan and Sons Ltd. Quarry ([Draft0033](#))
6. That a CPO be used on land in Tallaght village to provide for Green Open space, which was not provided when apartment development took place. ([Draft0062](#))
7. Section 3.3 referring to Town District and Local Centres makes no reference to Liffey Valley, an existing town for which an LAP was adopted in 2008 to develop it into a Major Town in South County Dublin- already designated one of the two Major Town Centres in the County- Proper status and recognition should be afforded to Liffey Valley. ([Draft0068](#))

8. Objection to 'flats being developed to the rear of the estate- too many flats around tallaght- no need for them. ([Draft0077](#))
9. Objection to potential development at Balrothery, Tallaght- Tallaght has too many apartments, more vacant apartments are not needed. ([Draft0088](#))
10. Requests that Brittas be designated as a rural village and growth centre and should be zoned accordingly. ([Draft0071](#))
11. Request that modest development be allowed within the Brittas area in order to preserve the village. Given this proposal community facilities, a community centre, a health centre, retail outlets and possibly a petrol service station would be required to reflect the resulting population growth. ([Draft0071](#))
12. Promote Tallaght as an Education City ([Draft0102](#))
13. Welcomes the commercial development of the Square, but does not welcome it if it means more apartments for Tallaght ([Draft0102](#))
14. Need to revisit the issue raised Cllr Crowe- Motion 178 regarding revitalisation of Tallaght Village. ([Draft0102](#))
15. Need for Senior Management to listen to community regarding Tallaght Town Centre. ([Draft0102](#))
16. Issues relating to Tallaght LAP; development on Main Road, Disappearing Pock Park ([Draft0102](#))
17. PolicyTDL23 Requests that the word 'urban' be replaced with the word 'rural' in Policy TDL23. ([Draft0107](#))
18. No further apartment development should take place within Tallaght until 85% of existing apartments have been filled. ([Draft0116](#))
19. Rathcoole should have a policy of protection of existing key buildings with the appropriate mandate to ensure that the character of the village notably the main street is maintained. ([Draft0154](#))
20. Policy 3.3.23 - Currently proposals for new developments, and built structure such as Eaton Court are out of scale and mass with the vernacular building on Main Street ([Draft0154](#))
21. Proliferation of high rise apartment development over the past few years, especially in Tallaght Village and Tallaght in general, has been a negative thing. The concerns of the community were ignored in relation to this in the preparation of the existing Development Plan. Because of the issue of uninhabited apartments, there should be no new apartments granted permission in Tallaght Town Centre until the occupancy of existing apartment blocks is above 85%. This should also apply to the redevelopment of the Square. ([Draft0176](#) [Draft0177](#) [Draft0178](#) [Draft0179](#) [Draft0180](#))
22. Suggests rezoning all undeveloped land on the Main Road from Tallaght Village to the site of Brian S Ryan to lower density levels, restricting building height to two storeys, in line with residential units nearby and setting back any development from the existing Main Road. Suggests excluding any apartments blocks; at the minimum any apartment block should be no more than 2 stories high; and 1 bed apartments should be excluded. Reinstate the Pocket Park that was previously allowed for in the zoning of the Main Road at the site of MPI (now Lidl). The Esso site (now derelict) should be rezoned or if necessary a land swap done in order for SDCC to take ownership of the site in order to provide community facilities. ([Draft0176](#) [Draft0177](#) [Draft0178](#) [Draft0179](#) [Draft0180](#))
23. In light of the departure of Fruitfield from Tallaght and the clear intention to enter the property business instead of keeping jobs in Tallaght, the Council should dezone the Blessington Road site or else cut a deal with Fruitfield whereby the Belgard Road site should be zoned for educational, hospital or community purposes. The Council should ensure that under no circumstances is the Belgard Road property rezoned to a use that will allow profit taking at the expense of Tallaght jobs. ([Draft0176](#) [Draft0177](#) [Draft0178](#) [Draft0179](#) [Draft0180](#))
24. The subject lands comprise approximately 2.04ha and are located at the Cookstown Estate Road roundabout, 500m from the Belgard/Cookstown Road junction and a short distance from the M50 interchange. The lands are zoned for Enterprise Priority One purposes within the Draft County Development Plan 2010-2016. It is noted that the primary focus of this zoning within the Draft Plan is on the development of the lands for enterprise purposes complemented by mixed use development. It is submitted that this is not entirely consistent with the objectives for the site as set out

- within the Tallaght Town Centre Local Area Plan which facilitates a mixed use development of the lands with up to 70% residential development. It is therefore requested that zoning objective EP1 is amended as follows within the 2010-2016 Development Plan: 'To facilitate opportunities for intensive employment uses and/or mixed use development based on a principle of street networks and in accordance with approved plans'. It is submitted that the aforementioned amendment to the EP1 Objective would facilitate the redevelopment of the lands in accordance with the objectives set out within the Tallaght Town Centre Local Area Plan. ([Draft0192](#))
25. Suggest addition to Section 3.3.6.ii The Square; "This Council shall prepare a Plan for the area in and around The Square, Tallaght, with a view to its future re-development incorporating the following objectives – • The undergrounding of all car-parking; • The development of the area surrounding The Square as an attractive town centre, incorporating landscaping and social amenities." ([Draft0157](#))
 26. Request that Brittas be designated as a Rural Village and Growth Centre ([Draft0235](#))
 27. The provision for the creation of district centres in sustainable, populated parts of the County should be seriously considered and supported by the Council for insertion into the development plan in order to maintain employment opportunities and provision of services to the 'local' economy. ([Draft0237](#))
 28. Seek clarification that the 'masterplans' required to be prepared for Local Centre lands may be developed by or for landowners rather than the Planning Authority. ([Draft0249](#))
 29. Local Area Plan for the Liffey Valley Town Centre lands be fully integrated into and will apply in the new Development Plan. ([Draft0167](#))
 30. Revise zoning of lands at main Road, Tallaght to lower density level. ([Draft0181](#) [Draft0182](#) [Draft0183](#) [Draft0184](#) [Draft0185](#) [Draft0186](#) [Draft0188](#) [Draft0189](#))
 31. Restrict new planning permissions for apartments in Tallaght Town Centre until existing apartments are occupied. ([Draft0181](#) [Draft0182](#) [Draft0183](#) [Draft0184](#) [Draft0185](#) [Draft0186](#) [Draft0188](#) [Draft0189](#))
 32. Request that the Council endeavour to develop the round tower heritage site with lecture theatre, gardens. ([Draft0245](#))
 33. Policy TDL35 should be amended to recognise the role of convenience retailing in sustaining the vitality and viability of local centres. ([Draft0250](#))
 34. Request that Clondalkin town centre be pedestrianised with Irish only signs. ([Draft0288](#))
 35. Request more linkage from Clondalkin to third level colleges at Tallaght and Maynooth. ([Draft0288](#))
 36. Request that waste ground at the corner of the 9th Lock Road and New Nangor Road be planted and provided with a sign for the Round Tower and should say 'Failte go dti Cluain Dolcain'. ([Draft0288](#))
 37. Policy TDL8 Tallaght By Pass- should not proceed until a traffic survey is carried out with respect to morning and evening peak times traffic, as traffic backing up on the N81 is causing disruption to other traffic ([Draft0130](#))
 38. need for the value and formal recognition of the importance of the heritage Tallaght holds and offers the County to be endorsed at the highest levels and a specific local objective for Tallaght should be included. The recently formally identified conservation area includes rich built legally protected structures and lends itself as an area that should house the museum. SDCC should proactively engage with the relevant Government Depts & agencies to secure funds for a heritage centre for the County and for Tallaght. ([Draft0139](#))
 39. Suggest addition to Section 3.3.6.ii The Square; "This Council shall prepare a Plan for the area in and around The Square, Tallaght, with a view to its future re-development incorporating the following objectives – • The undergrounding of all car-parking; • The development of the area surrounding The Square as an attractive town centre, incorporating landscaping and social amenities." ([Draft0196](#))
 40. The villages of Brittas, Saggart and Rathcoole to be designated as a rural village and growth centre; certain vernacular buildings in these villages to be designated as protected structures ([Draft0281](#))
 41. The area around the Clondalkin Round Tower to be developed into an historical park ([Draft0281](#))

42. The Plan should promote the application of standard impact assessment methodology for all such development (proposed development with potential to impact adversely on significant landscape features). This may be of particular relevance in the context of the proposed SDZ areas referenced in the Plan. ([Draft0254](#))
43. The Plan should include a specific objective requiring the development by the local authority, in association with relevant key stakeholders, of an "Integrated Phase Implementation Plan/Programme for Critical Water, Surface Drainage and Waste Water related infrastructure" to service the SDZ areas of Adamstown and Clonburris. Such a Plan/Programme should take into account the Phasing of the development of the SDZ areas and the vulnerability/Water Framework Directive Risk Categories of the receiving waters in the zone of influence of the SDZ areas and the water and wastewater related infrastructure servicing these areas. The proposed implementation and phasing of the SDZ areas should also take into account any revisions to population/targets likely to be allocated via the Regional Planning Guidelines currently under review. ([Draft0254](#))

2.2 2 A Connected Place

2.2.1 2.1 Environmental Services

1. Insert Policy in relation to Incinerators- to ensure "the expressed wishes of SDCC Councillors, the families that live within SDCC and the Council themselves be galvanised against further applications which will be costly." ([Draft0061](#))
2. Question why Biodegradeable Waste has not been included as a Priority Waste Stream? ([Draft0061](#))
3. Request Council to be mindful of obligations under Food Waste Regulations- come into effect in 2010 ([Draft0061](#))
4. Policy ES7- missed opportunity to state that we would welcome the siting of more sustainable waste management infrastructure within the County - labour intensive activities could provide much needed employment stimulus ([Draft0061](#))
5. Section 2.4.13- Municipal Solid Waste Disposal- intention to develop 'waste to energy' conversion systems is in direct conflict with the expressed wishes of the SDCC Councillors and population of South Dublin- does not preclude the citing of an incinerator in South Dublin ([Draft0061](#) [Draft0102](#))
6. Policy ES9- Mechanical and biological treatment of residual waste has less impact in relation to green house gases compared to landfill or incineration and hasn't been considered ([Draft0061](#))
7. SDCC have the least number of inspections and enforcement procedures of the Four Dublin Authorities in relation to illegal dumping- clear message to offenders that this will go unpunished. ([Draft0061](#))
8. Funds from residual waste levies should be ringfenced to develop an environmental fund- utilise this for illegal dumping in the Dublin Mountains ([Draft0061](#))
9. Lack of appropriate waste management infrastructure -recycling and composting facilities should be first to operate ([Draft0061](#))
10. request to assign dedicated person to role of Waste Prevention Officer ([Draft0061](#))
11. Suggest provide curb side green waste collection or establish collection of green waste and food waste on alternate weeks ([Draft0061](#))
12. Implementation of Brown Bin will help fulfill obligations under the land fill directive and strengthen and enhance the collection of food waste from the commercial sector. ([Draft0061](#) [Draft0102](#))
13. Plan does not set out metrics in relation to the recovery of construction and demolition waste- reflect the review of the Waste Management Policy (DoEHLG) ([Draft0061](#))
14. Request a register of enforcement activity against companies and individuals who have carried out illegal dumping- introduce more stringent measures of enforcement. ([Draft0061](#))

15. Amend Section 2.4.5 as follows: • Amend the third paragraph under Section 2.4.5 to read: Recycling and re-use will be a priority of the Council in the disposal of waste. In accordance with the Waste Management Act, 1996 (as amended), this Development Plan shall be deemed to include the objectives for the time being contained in the Waste Management Plan for the Dublin Region 2005 to 2010 (or as may be amended from time to time). The Council will endeavour to develop its own Waste Management Plan involving greater emphasis on reduce, reuse, recycle and a commitment not to incinerate any materials for a ten year period, pending evaluation of the success of national waste management strategy. • Omit the word 'further' from the fourth paragraph under Section 2.4.5. • Support for the points made in the fifth and sixth paragraphs in Section 2.4.5. ([Draft0063](#))
16. Request that South Dublin County Council and the EPA regulate landfill, reclamation and its impact on the people of the locality, the infrastructure and environment. ([Draft0071](#))
17. Deploy CCTV to discourage illegal-tipping. ([Draft0071](#))
18. The Council should welcome the labour intensive recycling jobs that recycling will bring. ([Draft0102](#))
19. Significant deficiencies particular in relation to biodegradable waste management and missed opportunities in relation to the leverage of employment opportunities in sustainable waste management. ([Draft0105](#))
20. Section 2.4.13 Municipal Solid Waste Disposal should be deleted ([Draft0105](#) [Draft0144](#))
21. biodegradable waste should have been included in the list of Priority Waste Streams ([Draft0105](#) [Draft0144](#))
22. Proposals to roll-out the brown-bin service either by the Council or by third party operators is essential ([Draft0105](#) [Draft0137](#) [Draft0138](#) [Draft0144](#))
23. Employ a Waste Minimisation Officer and to work with the other council's in the Dublin Region ([Draft0105](#) [Draft0144](#))
24. Would welcome a specific addition to Section 2.4.17 to highlight the suitability of locating recycling facilities in authorised working extractive sites, in line with most Regional Waste Management Plans nationwide. ([Draft0100](#))
25. Policy ES19 Policy ES19 should be amended to read "to assess and minimise the effects of all external lighting on environmental amenity." ([Draft0107](#))
26. Disappointed to note that the Esker Green Waste facility has closed. This should be re-opened or replaced. ([Draft0137](#) [Draft0138](#))
27. Roads are a great source of noise pollution and in relation to same we would like to draw attention to the SEA Environmental Report prepared for the Draft Plan section 3.2.11 Human Health Issues: Existing Problems / Environmental Considerations ([Draft0154](#))
28. Any new environmental initiatives (ie , the use of on-site micro renewables or district heating systems) required by the Council should be treated as a 'pilot projects'. Developers who are conditioned to provide for such initiatives should be grant aided by the Council in request of these requirements. Such additional costs are prohibitive in the current economic environment, and will act as a deterrent for promotion of future development ([Draft0237](#))
29. Having regard to the delays associated with the thermal treatment plant at Poolbeg, it is sensible and in accordance with proper waste management planning that Mechanical Biological Treatment (MBT) is recognised as a residual treatment option in the Development Plan to ensure the landfill directive targets are achieved. ([Draft0248](#))
30. The specific reference to 'composting' in policy ES3 and ES7 should be replaced with referral to 'biological treatment' to incorporate other forms of such treatment including Anaerobic Digestion. ([Draft0248](#))
31. Suggest adding 'and/or private waste operators' are included after the words 'with adjoining local authorities' in section 2.4.13 in relation to MSW disposal. ([Draft0248](#))
32. Request that Section 2.4.29 Light Pollution/Policy ES19 be amended to read "to assess and minimise the effects of all external lighting on environmental amenity". ([Draft0240](#))
33. Suggest omit a) "Waste to energy' conversion;" from 2.4.14.i Policy ES9 ([Draft0158](#))

34. CCTV cameras be installed in areas used for illegal tipping to discourage the practice, including locations at Redgap, and the Slade of Saggart; ([Draft0281](#))
35. litter management plans be devised for Rathcoole, Lucan, Clondalkin and Palmerstown ([Draft0281](#))
36. The Plan should promote and take into account, as appropriate, the maximisation of opportunities for waste prevention and source separation of waste through provision of adequate civic amenity and/or bring sites within Plan area, and National and Regional Waste Management Planning processes so that priority waste issues are addressed i.e. the implementation of segregated brown bin collection for biowaste. ([Draft0254](#))
37. The Plan should take into account, where appropriate, the information and any recommendations in the following EPA reports The Nature and Extent of Unauthorised Waste Activity in Ireland, National Waste Report 2006, National Hazardous Waste Management Plan 2008 – 2012, and Ireland's Environment 2008 – State of the Environment report. ([Draft0254](#))
38. The Plan should highlight as appropriate the requirements of the Waste Management (Certification of historic unlicensed waste disposal and recovery activity) Regulations 2008 (SI No. 524 of 2008). ([Draft0254](#))
39. - The Plan should promote an integrated approach to waste management for any proposed development. An integrated plan for managing waste should include wastes generated during the construction phase of development as well as the operation and maintenance phases. In this regard, the Plan should make reference to the Best Practice Guidelines on the preparation of Waste Management Plan for Construction & Demolition Projects" (DEHLG July 2006). ([Draft0254](#))
40. - Consideration should be given to the inclusion of a new Objective / Policy (or the amendment of Policy ES12) to include the use of statutory powers to prohibit the illegal burning, deposit and disposal of waste materials. ([Draft0254](#))
41. Consideration should be given to promoting specific Policies / Objectives in the Plan for the protection and improvement, as appropriate, of air quality within the Plan area, particularly in areas zoned for increased urban and transport related development. ([Draft0254](#))
42. The Plan should promote, where appropriate, the use of renewable energy systems (e.g. solar, wind, geothermal etc.) within the Plan area. The Plan should also provide for promotion of energy conservation measures in buildings. ([Draft0254](#))

2.2.2 2.2 Telecommunications and Energy

1. It is Government stated policy that there is no health risk from base station installations, provided they operate in compliance with international emission standards as may be set from time to time. ([Draft0049](#))
2. Information relating to all telecommunications structures within 1km of a proposed site. Some 90% of base stations involve the use of high buildings or co-location. While such information can be provided, it is respectfully suggested that its provision will not be of any practical benefit to the Planning Authority. ([Draft0049](#))
3. Need to support the extension and reinforcement of the electricity network recognised in the Draft Plan. ([Draft0027](#))
4. Overhead lines preferred means of distributing Electricity ([Draft0027](#))
5. ESB consulted as early as possible for new development-lead in times for 110kV substations and cable connections 3-4 years ([Draft0027](#))
6. Availability of sites in urban locations for installation of HV substations problematic-provisions should be made in early phase of planning ([Draft0027](#))
7. Highest priority be assigned to the provision of electricity infrastructure-essential for social and economic development. ([Draft0027](#))
8. Encourages the compulsory inclusion of the benefits of a geothermal led district network in all Local Area Plans for the County ([Draft0060](#))
9. Extend Policy 2.5.10(i) to include " Support of the Pilot Scheme at Newcastle and the Continued investigation of the Potential and scale of the deep geothermal resource found at Newcastle and to support the promotion and investigation of the resource in South County Dublin" ([Draft0060](#))

10. Include strong policy support in relation to the provision for the construction of back up plants and required ancillary work and the development of necessary district heating networks to distribute available heat- geothermal energy. ([Draft0060](#))
11. A consequence of the 100m rule will lead to a number of refusals of planning permission, all of which will be appealed, and given An Bord Pleanála's current practice, will have such a requirement rejected and permission will be granted. This will lead to unnecessary time and financial costs for the County Council, An Bord Pleanála, the operator and possible third parties. ([Draft0049](#))
12. There is a lack of clarity and a conflict in the wording of the draft plan. The paragraph (A) refers to "planning applications" relating to sites where planning permission for such development has previously been granted. This statement is ambiguous as such a planning application is normally referred to as an application for retention permission. ([Draft0049](#))
13. Paragraph B refers to "previous temporary grants of permission" As all permissions for telecommunications installations granted by the Council are "temporary" in that five year limits apply, this wording appears to be, in effect, the same as A "development that has previously been granted" ([Draft0049](#) [Draft0156](#))
14. O2 is concerned that the reference to "residential areas" as the 100m, if applied as proposed will rule out the provision/maintenance of mobile phone coverage from the very large residential areas throughout the county. ([Draft0049](#))
15. The proposed distance constraint applies to masts but there area also references to the 100m distance between "antennas" and residential areas etc which would rule out roof top and other unobtrusive and acceptable installations not using mast support structures as referred to in the Guidelines. ([Draft0049](#))
16. It is not clear whether the reference to schools is to encompass, pre-schools, primary schools, secondary schools, special schools and third level colleges which is unjustified and would also impose excessive spatial limitations on locating retaining base station sites. ([Draft0049](#))
17. The 1996 Guidelines addressed the matter of base station sites in residential areas. The guidelines do not suggest that base stations should be refused in residential areas. No distance is specified. If the Guidelines are to be ignored, the planning authority should clearly indicate why. This it has failed to do. ([Draft0049](#))
18. Information relating to all telecommunications structures within 1km of a proposed site. Some 90% of base stations involve the use of high buildings or co-location. While such information can be provided, it is respectfully suggested that its provision will not be of any practical benefit to the Planning Authority. ([Draft0049](#))
19. The Provision of amelioration of visual impacts is no problem, and forms part of many applications, but is more effectively dealt with by condition. ([Draft0049](#))
20. The planning authority is misguided in actually specifying the standard. As noted above the determination of appropriate standards is a matter for ComReg who sets out the internationally accepted standards to be complied with ([Draft0049](#))
21. Hope that the geothermal fault line that traverses the County will be explored and tested for suitability as an energy source. Do not wish for it to be used as an excuse, or bargaining chip, for the zoning or permttal of residential development ([Draft0105](#) [Draft0137](#) [Draft0138](#) [Draft0144](#))
22. Section 2.5.9 Requests that the phrase "on lands already rezoned for residential purposes in previous Development Plans" be inserted after "in a new energy self-sufficient residential development" in Section 2.5.9. In addition to this the sentence "to ensure that such an energy resource is in use before this County Development runs its course" be removed. ([Draft0107](#))
23. Exclusion Zones- No reference is made for the requirement of exclusion zones in the 1996 DoE document. When a planning application is refused on this basis and is appealed to An Bord Pleanála, the Bord will invariably overturn this decision for refusal. ([Draft0156](#))
24. 3G networks- Specific reference to 3G base station sites that facilitate mobile operators in the deployment of reliable 3G wireless broadband and telephony services in residential areas should be catered for ([Draft0156](#))
25. Recommend that South Dublin County Council actively engage with mobile operators to make council properties available for shared mobile operator sites subject to the normal planning process. ([Draft0156](#))

26. Recommend the inclusion of existing utilities such as street lighting, video camera surveillance camera poles, telephone boxes and bus shelters be included as possible technological solutions for the rollout of 3rd Generation Technologies and considered exempted development. ([Draft0156](#))
27. Vodafone would welcome the opportunity for ongoing dialogue with both County Council members and officials on a regular basis. This dialogue would present both parties with the opportunity for updates on technology development, network rollout plans for the county and other issues relating to mobile technology ([Draft0156](#))
28. With regard to the objective to examine the possibility of designating a highland area of the county as being suitable for the production of wind energy, it is recommended that the Departmental Guidelines and compliance thereto are referred to in the Plan. In addition such a designation would be subject to appropriate assessment screening and if necessary appropriate assessment. ([Draft0164](#))
29. Requests that the Telecommunications policy be amended to relax the 100 metres restriction on communication masts in vicinity of residential areas, schools and hospitals, as no adverse short or long-term health effects have been shown to occur from RF signals produced by base stations. A more flexible approach is suggested which will facilitate exceptions to be made to the 100 metre rule, where a site can be proven to be a location of last resort, as set out in the 1996 Guidelines for Planning Authorities – Telecommunications Antennae and Support Structures It is only through adopting the policy in this way that the council can hope to achieve its goal of securing the counties image as the premier location for enterprise. ([Draft0172](#))
30. Requests that all references to public health relating to telecommunications sites be removed from the draft plan ([Draft0174](#))
31. Policy 2.5.9 Renewable Energy Believes that this policy is inadequate with regard to geothermal energy and it ignores the potential of the resource at Newcastle. Suggests that research has already been carried out and that there is no requirement for the Council to examine potential geothermal resources. Furthermore the Plan should contain an acknowledgment of the benefits of geothermal energy and the potential of Newcastle in this regard. ([Draft0216](#))
32. Request that the Plan includes an objective on energy and renewable energy, inline with the white paper on energy, 'Towards A Sustainable Energy Future for Ireland', the Energy Policy Framework 2007-2020. ([Draft0233](#) [Draft0234](#))
33. Request that the Plan makes reference to the government's energy strategies and the relevant bodies that are mandated to implement these such as EirGrid through its Grid25 strategic document. ([Draft0233](#) [Draft0234](#))
34. Request that the Plan include an objective to be in line with the government objective of achieving 40% renewable energy by 2020, to be facilitated by the upgrading and strengthening of the Grid by Eirgrid. ([Draft0233](#) [Draft0234](#))
35. Request that the Plan include an objective to support and facilitate bulk energy infrastructure as the underlying backbone of development in the region to include maps. ([Draft0233](#) [Draft0234](#))
36. Requests that the concept of corridor development be applied within the Plan to facilitate the county wide national electrical grid and grid connections. Stresses the requirement to conform to the NSS objective for strategic corridors. ([Draft0233](#) [Draft0234](#))
37. Request that the Plan makes a distinction between the distributions system and the transmission system of the electrical grid and that there should be a presumption in favour of the over grounding of Transmission lines. ([Draft0233](#) [Draft0234](#))
38. Section 2.5.8 – Telecommunications Antennae and Support Structures Request that the 100m rule, the limiting of permission to 3 years, the requirement to provide evidence that relevant bodies have been consulted and all references to public health with regards to telecommunication masts be removed from the Plan as it will result in a loss of phone and mobile coverage and will be contrary to the Council's aim to promote and facilitate widespread telecommunications infrastructure. ([Draft0239](#))
39. In order to ensure that the pilot project mentioned in Section 2.5.9 does not involve the rezoning of additional residential lands the words "on lands already rezoned for residential purposes in previous Development Plans" should be inserted after "in a new energy self-sufficient residential development". And the following sentence

- should be removed: "to ensure that such an energy resource is in use before this County Development Plan runs its course". ([Draft0240](#))
40. Support given for the geothermal pilot project at Newcastle/Greenogue. ([Draft0244](#))
 41. Request that the Plan state clear support for the possibility of biomass becoming a significant contributor to the energy mix in the County. ([Draft0244](#))
 42. Request that Section 2.5.11 be amended to ensure that private investment in the area of wind energy development be attracted to the County. ([Draft0244](#))
 43. Request that council properties be made available for use by mobile operators such as parklands. ([Draft0244](#))
 44. Request for the removal of the 100m exclusion zone in relation to telecommunications masts. ([Draft0244](#))
 45. Request that the temporary permission given to telecommunications infrastructure be increased to ten years or made permanent. ([Draft0244](#))
 46. Specific reference to 3G base station sites that facilitate mobile operators in the deployment of reliable 3G wireless broadband and telephony services in residential areas should be catered for in the new guidelines. ([Draft0244](#))
 47. Recommend the inclusion of existing utilities such as street lighting, video camera surveillance camera poles, telephone boxes and bus shelters be included as possible technological solutions for the rollout of 3rd Generation Technologies and considered exempted development. ([Draft0244](#))
 48. Request that telephone masts be erected no more than 100 metres away from any Hospital, School, Community Centre, Police Station and so on. ([Draft0245](#))
 49. Support for Council's aim of facilitating a widespread telecommunications infrastructure in sustainable locations. ([Draft0246](#))
 50. Section 2.5.8 – Telecommunications Antennae and Support Structures Request that the 100m rule, the limiting of permission to 3 years, the requirement to provide evidence that relevant bodies have been consulted and all references to public health with regards to telecommunication masts be removed from the Plan as it will result in a loss of phone and mobile coverage and will be contrary to the Council's aim to promote and facilitate widespread telecommunications infrastructure. ([Draft0246](#))
 51. Policy EC3 The following should be added to the policy: 'Prohibit any development which would impinge on a public right of way or walking route'. ([Draft0018](#))
 52. Policy EC8 Request that this policy be amended to cover all hydro-power developments. ([Draft0018](#))
 53. Support for Policy/Section 2.5.11 ([Draft0018](#))
 54. Regarding the objective to examine the possibility of designating a highland area as being suitable for the production of wind energy, the relevant department guidelines and compliance thereto should be referred to in the plan, and such designation should be subject to appropriate assessment screening and if necessary appropriate assessment. ([Draft0283](#))
 55. the extension of street lighting from Newcastle village to Greenogue; ([Draft0281](#))

2.2.3 2.3 Transportation

1. Requests a new road objective to link Woodstown Estate with Stocking Avenue to alleviate traffic congestion in the Ballycullen Area. ([Draft0003](#))
2. Remove Long Term Road Proposal Table 2.2.6 - Esker Lane to Esker Meadow View, Lucan ([Draft0010](#) [Draft0096](#) [Draft0097](#))
3. Amend Policy T19 and paragraph 2.2.3 to state "Protect the capacity, efficiency and safety of national road infrastructure including junctions and keep the number of junctions to a minimum consistent with good traffic management" ([Draft0008](#))
4. NRA is not likely to be responsible for the financing of other projects included in Tables 2.2.5 and 2.2.6 and the provision of pedestrian bridges under SLO 10 & 48 as these are not an NRA priority. ([Draft0008](#))
5. The plan includes for additional connectivity to the national roads network at Cloverhill (SLO 26) and Keatings Park (SLO 60) however there will be a presumption by the Authority against further junction capacity increases on the motorway/high quality dual carriageway network. ([Draft0008](#))
6. The authority considers the inclusion of the rezoning as well as SLO 58 and 59 are inappropriate as they will seriously compromise the capacity, efficiency and operation

- of the N7 and recommends that these elements of the Draft Plan should be omitted ([Draft0008](#))
7. Park and ride sites at Lucan N4 and N7 should only be implemented in accordance with an agreed and co-ordinated strategy for the provision of park and ride sites between all stakeholders including the NRA ([Draft0008](#))
 8. It should be noted that the provision, operation and funding of public transportation infrastructure such as bus priority lanes are outside the remit of the NRA. ([Draft0008](#))
 9. It is recommended that Traffic and Transport Assessment Guidelines (TTA) and also the Road Safety Audit process which is detailed in the Authority's DMRB are referred to in the Text. ([Draft0008](#))
 10. The residents of Ambervale are watching to ensure that the Cookstown Road will have its slip road at Cairnwood for the residents of St Marks Parish ([Draft0025](#))
 11. Propose a new Park and ride Facility beside Brownes Barn, Baldonnell ([Draft0026](#))
 12. This proposed Park and Ride facility satisfies that part of the draft plan as the location is beside the Browne's Barn Premises with potential immediate access to the City West interchange approaching from the Baldonnell side ([Draft0026](#))
 13. In favour of the 'Barton Road East extension to Grange Road' long term road proposal. ([Draft0013](#))
 14. Strongly wish to see the removal of the proposed road link between Esker Meadows View and Esker Meadow Park from the County Development Plan. ([Draft0057](#))
 15. Would like it to be stated in Connected Place that the County is well served by public transport and is accessible and this adds to the County's attractiveness as a tourism location. ([Draft0014](#))
 16. Likely that Quality Bus Network Projects schemes additional to those set out in the Draft (Section 2.2.8, Table 2.2.1) could be implemented - important to state "This list is non exhaustive and additional schemes may be progressed should they be identified as part of a high quality network of public transport within SDCC" ([Draft0029](#))
 17. Section 2.2.8 and Table 2.2.1: Should state that the list of the QBC network within the County is non-exhaustive and that additional schemes may be progressed during the lifetime of the Plan. ([Draft0036](#))
 18. Requests that the proposed link road between Esker Meadows View and Esker Meadow Park be removed from the Plan. ([Draft0053](#) [Draft0054](#) [Draft0055](#) [Draft0094](#) [Draft0149](#) [Draft0143](#))
 19. Corridor for Metro West should now be reserved and protected- route is fixed, reference design nearing completion ([Draft0042](#))
 20. On completion of details of final alignment of preferred route of Lucan Luas alignment should be reserved and illustrated on Development Plan maps ([Draft0042](#))
 21. RPA welcome opportunity to discuss policy T18 Park and Ride further ([Draft0042](#))
 22. Request that any further detail on the alignment or design of the link road proposed from Adamstown SDZ to the Celbridge Road (Table 2.2.5) is carried out in consultation with the OPW as the indicative alignment appears to affect Backweston Farm- managed by the OPW- to ensure the ongoing activity of the farm and associated laboratories are not negatively effected by the road ([Draft0095](#))
 23. The realignment / replacement of the N81 between Tallaght and Baltinglass should not impede development in the wider constraints study area. ([Draft0071](#))
 24. The submission raises specific issues relating to Brittas including the need for traffic calming in the area; an upgrading of road conditions; and a request for a road-cleaner once a week. ([Draft0071](#))
 25. Preserve and enforce the maintenance of hedgerows to allow for safer use of footpaths. ([Draft0071](#))
 26. Request that the Council publish detailed maps of the final four Local Roads mentioned in Table 2.2.5 Six Year Road Objectives, as they are planned to run through sections of the Dodder valley. ([Draft0102](#))
 27. Interactive maps do not give clear information about where any new roads are being developed. But it is our understanding that roads are planned to run through sections of the Dodder Valley . ([Draft0102](#))
 28. The final four Local Roads mentioned in Table 2.2.5 Six Year Road Objectives. It is unclear if they are new or extended roads. ([Draft0102](#))
 29. West Circular Route should be added to the CDP as an objective ([Draft0105](#) [Draft0137](#) [Draft0138](#) [Draft0144](#))

30. The road-focused strategy in the Plan should be replaced with a focus on public transport provision ([Draft0105](#) [Draft0137](#) [Draft0138](#) [Draft0144](#))
31. Rathcoole Distributor and Relief Roads and associated interchanges with the N7 as a Specific Local Objectives should be removed. ([Draft0105](#) [Draft0137](#) [Draft0138](#) [Draft0144](#))
32. Rathcoole – Keating's Park – Interchange should be removed ([Draft0105](#) [Draft0137](#) [Draft0138](#) [Draft0144](#))
33. Recommends that parking should be spatially defined, using an area based approach to allow for a consistent implementation of parking policy in the County. ([Draft0098](#))
34. Recommends that a countywide cycle network be developed. ([Draft0098](#))
35. Support given for policies that promote permeable and pedestrian and cyclist networks. ([Draft0098](#))
36. States concern with a number of the long term roads objectives, in particular the extensive road network proposed in the west of the County and requests a justification to be provided within the Draft Development Plan. These roads should be subject to evaluation against the criteria set out in current government transport policy (Department of Transport's Smarter Travel – A Sustainable Transport Future) ([Draft0098](#))
37. Would like provision to be made for cyclist movement between the villages of Saggart, Rathcoole, Newcastle, Clondalkin and Lucan. ([Draft0107](#))
38. The major focus of the IÉ Investment Plan of relevance to the new CDP in South Dublin is on the development of commuter links to the Capital. ([Draft0147](#))
39. The Kildare Route Project is a major rail infrastructure project involving the quadrupling of a critical section of track between Cherry Orchard and Hazlehatch on the Heuston-Kildare line, as well as associated ancillary works such as signalling and station developments. The project will allow separation of long distance and commuter services and improve speed and capacity for commuter, regional and intercity services. ([Draft0147](#))
40. The areas served by the Heuston/Kildare line are growing rapidly. A key future objective is to accommodate a peak hour service pattern of 4 commuter, 4 regional and 4 intercity services. The project will also facilitate higher density developments along the corridor according to local authority land use objectives. Construction commenced mid 2007 and is expected to be completed by 2010. ([Draft0147](#))
41. Our objective under Transport 21 to build an Interconnector tunnel through Dublin city centre. It is intended that this will facilitate in the future the through running of commuter services between the south-west rail corridor and the northern line. This will have a major benefit to existing and potential rail customers in South Dublin ([Draft0147](#))
42. Welcome the retention of a roads objective to provide road between Barneys Lane and the Citywest Interchange ([Draft0129](#))
43. It is noted and of concern that on map 1 there is a long term road proposal that appears to stop just before going through the Liffey Valley pNHA. An arrow is shown at the end of the proposed road which implies that it would continue at some future date to go through the pNHA and across the Liffey in the vicinity St. Catherine's Wood. ([Draft0164](#))
44. Map 1 there is a long term road proposal that crosses the Grand Canal at Gollierstown. A previous submission from the Department's Development Applications Unit (ref. G2009/878) on the importance of this part of the canal and the surrounding lands refers. ([Draft0164](#))
45. Great concern in relation to SLO 60 and 62. Feel that the interchange at Rathcoole is sufficient and that the feasibility of providing an interchange on is not to serve the residents of Rathcoole. We would question the coupling of the aeronautical study and the screening of street lighting (which is not practical) in the context of this Specific Local Objective ([Draft0154](#))
46. • Consider that this distributor road to the South of Rathcoole directly contravenes the Council's own policies notably; 1.3.3 Groups with Specific Design/Planning Needs, 1.3.3.i Young People and Children; 4.3.9.vii Policy LHA30: Green Structure; 4.3.9.iii Policy LHA26: Preservation of Major Natural Amenities. ([Draft0154](#))
47. Strongly object to long term road objective for a road over the River Dodder linking Bohernabreena with Kiltipper road. ([Draft0113](#) [Draft0114](#))

48. Request removal of the roads objective on Whitechurch Road immediately adjacent to the western wall of St Enda's Park in line with the omissions of the links to the north and south in previous development plans. ([Draft0122](#))
49. Request Public Transport Policy, with off-street dedicated public transport hubs, now not in 20 years ([Draft0123](#))
50. The Development Plan should deal with the misguided policy of setting aside large portions of scarce public roads to provide bus corridors that are either underutilised or not used at all. ([Draft0123](#))
51. The Development Plan must state that excellent public transport service comes well ahead of company and or staff demands, and that busses must give value for public money by operating continuously ([Draft0123](#))
52. Improve the road safely and sight lines on the Edmondstown Road at the Tibbradden Road junction and at the entrance to Rockbrook Park School in cooperation with the latter. (attached map) ([Draft0132](#) [Draft0231](#))
53. Improve safe access to existing and future educational and recreational development at Rockbrook by working with landowners to seek improvements to existing traffic problems when new development is being planned and authorised ([Draft0132](#) [Draft0231](#))
54. Part of the original Naas Road which is now fenced off and closed as a public road leading to the N7. This should be retained in County Council ownership and developed for off-street public car parking as currently there effectively is no off-street public car parking for visitors to Kingswood Village. ([Draft0106](#))
55. The requirement to continue and front-load infrastructure is very important to the County therefore the development plan should be flexible in order to adapt to national transport and infrastructure strategy objectives as they arise. ([Draft0237](#))
56. Request the Re-alignment of the Knocklyon Road. ([Draft0266](#) [Draft0267](#) [Draft0268](#) [Draft0272](#) [Draft0273](#) [Draft0274](#) [Draft0278](#))
57. New developments should include cycle routes that are linked into the cycle route network ([Draft0284](#))
58. Recommend that a new be inserted after Policy T29 of the Draft Development Plan that the Planning Authority will positively consider the piloting of car-free developments at locations served by high quality public transport. ([Draft0255](#))
59. The Company is pleased that the concept of a Park and Ride facility currently forms part of the South Dublin Draft Plan and is convinced that its proposals will give concrete expression to that aspiration ([Draft0259](#))
60. Two objectives be included in the Plan, providing for the upgrade of Knockmeenagh Lane to a local Distributor Road, and for a link road connecting Knockmeenagh Lane to Monastery Road, as indicated in the Monastery Road Development Brief, via the existing roundabout on Monastery Road. ([Draft0169](#))
61. Object strongly to the location of the proposed road linking Bohernabreena and Kiltipper ([Draft0181](#) [Draft0182](#) [Draft0183](#) [Draft0184](#) [Draft0185](#) [Draft0186](#) [Draft0188](#) [Draft0189](#))
62. Concern regarding proposed new Local Road – Oldcourt LAP ([Draft0187](#))
63. Request that there will not be a policy to extend pay for parking to outside of the village areas. ([Draft0245](#))
64. The implementation of the Electric Transportation Programme should not impact upon the operation requirements of retailers. ([Draft0250](#))
65. Request the removal of Policy T15 until consultation takes place with convenience retailers. ([Draft0250](#))
66. Request that car parking spaces be reserved to cater for the trips generated by individual units. Charging spaces should be in addition to the Development Plan maximum parking requirement. ([Draft0250](#))
67. Request that Policy T29 be amended to reflect the content of the Retail Planning Strategy for the GDA, 2008-2016 with regards to the necessity to use private car. ([Draft0250](#))
68. Request that maximum car parking standards not be applied to convenience foodstores located proximate to public transport facilities. ([Draft0250](#))
69. Request that the Plan recognise that certain retail formats require surface car parking. ([Draft0250](#))

70. Questions the car parking standards within the Draft Plan and asks for a review of these standards in relation to Food – Retail use. In particular requests that the Plan incorporates a car parking standard of 1 space per 14m² gross floor area for Retail-Food. ([Draft0250](#))
71. Request that the realignment of the Knocklyon Road be carried out within the lifetime of the Plan as increasing problems such as traffic volumes, congestion, inadequate lighting and traffic signal sequencing have made the realignment urgent. ([Draft0256](#))
72. Request the immediate construction of the re-alignment of the Knocklyon Road in the vicinity of Lansdowne Park and District to include: • Chicane the Knocklyon Road at the junction with the Firhouse Road. • Installation of speed ramps and traffic calming systems • Provide large speed limit signs • Reduce speed limit to 30Kph • Provide a pedestrian crossing at the garage shop. ([Draft0263](#) [Draft0264](#) [Draft0265](#) [Draft0269](#) [Draft0270](#) [Draft0271](#))
73. Request for the provision of more bus shelters on the streets. ([Draft0288](#))
74. Request the introduction of free bicycles similar to those provided within Dublin City. ([Draft0288](#))
75. Request that the Plan makes provision for electrical cars in the future. ([Draft0288](#))
76. Request for cycle and bus lanes within the County. ([Draft0288](#))
77. Section 2.2.14 Walking and Cycling • Section 2.2.14 should be expanded and other County Development Plans should be used to review the expansion. • In 2nd paragraph the following should be added: 'providing they are protected by a kerb'. • In penultimate paragraph the following should be the first point: ' In view of the obesity and diabetes crises' ([Draft0018](#))
78. Support for Policy/Section 2.2.14 ([Draft0018](#))
79. The existing R120 is substandard and the proposed upgrade is indicated to be a long-term objective. SDCC must be held to account if this proposed industrial area is allowed access to the existing R120. A connection should be made to the underused roads in the Grange Castle Business Park to facilitate traffic between Adamstown to GCBP and shorten journeys for GCBP workers. ([Draft0131](#))
80. The Outer Ring Road should be extended northward and a new Liffey crossing provided as a free alternative to the tolled M50 in line with EU regulations. ([Draft0131](#))
81. The heritage and environmental importance of the 12th lock canal bridge can only be realistically preserved if the R120 is re-routed to a less sensitive location. ([Draft0131](#))
82. An extension of the Luas to Kiltipper along the Sean Walshe park should be considered, to improve public transport in the area and also to/from the county town. There needs to be a strategy to upgrade all older bus routes in Tallaght South with bus shelters similar to newer routes ([Draft0139](#))
83. There are too many off road cycle tracks proposed for local roads, where footpaths are narrower and conflict with pedestrians is more likely. ([Draft0158](#))
84. Suggest amend Note 2 to Table 2.2.4 to require minimum parking bay widths to exclude any structural pillars and other obstacles. ([Draft0158](#))
85. The long term road proposal indicated on the maps to cross the Liffey Valley pNHA is of concern, as the pNHA is a wildlife corridor and an important site for biodiversity including protected species and rare plants. This long term road proposal also crosses the Grand Canal and has the potential to impact on two watercourses which are important wildlife corridors. They are likely to contain otters and bats which are listed on Annexe IV of the Habitats Directive, and this issue should be assessed in the SEA. ([Draft0283](#))
86. proposes the implementation of a HGV ban on the main Newcastle / Adamstown Road through Lucan ([Draft0281](#))
87. Installation of CCTV cameras on Kennelsfort Road to ensure enforcement of the 3 tonne limit ([Draft0281](#))
88. that a park safe strategy devised by Lucan Educate Together be used as a model for a County wide road safety campaign outside schools ([Draft0281](#))
89. that provision be made to re-open and make safe Tandy's Lane Lucan and Tay Lane Newcastle ([Draft0281](#))
90. that the need for an interchange at Keatings Park Rathcoole be re-examined ([Draft0281](#))
91. Proposes the construction of a park & ride site at Saggart ([Draft0281](#))

92. Provision of a lighted junction at Hillcrest Road and Adamstown Road Newcastle intersection ([Draft0281](#))
93. Traffic management plans for Palmerstown, Lucan and Rathcoole. ([Draft0281](#))
94. Proposed re-alignment of the Knocklyon Road, and the exposure of residents in the vicinity of Lansdowne Park and District to horrendous traffic levels and speeding related to the surrounding road network. ([Draft0277](#) [Draft0276](#) [Draft0275](#))

2.2.4 2.4 Water Supply and Drainage

1. Brittas village should be provided with a potable water supply and be provided with connection to mains supply. ([Draft0071](#))
2. Seeking a water treatment plant to serve village, rural housing and modest future expansion. ([Draft0071](#))
3. Requests a strategy to control flash flooding in the Brittas area. ([Draft0071](#))
4. Request Council immediately performs flood risk assessment on all residential and industrial zoned lands in the county- written into CDP as a policy ([Draft0105](#) [Draft0137](#) [Draft0138](#) [Draft0144](#))
5. Section 2.3.4 should be expanded to include a clear strategy on the need for mandatory water harvesting and that a specific supportive policy be included in the plan. ([Draft0100](#))
6. Recommend inserting the following Text in Policy WD15 'Where it is a recommendation of the CFRAMS that land zoned for development constitutes an unacceptable flood risk the Planning Authority will commence proceedings under s.13 of the Planning and Development Act 2000 (as amended) to amend the zoning objection pertaining to the lands as required ([Draft0255](#))
7. At S. 7.10.3 insert new policy objective as follows 'That the Planning Authority will positively support the provision of Integrated Constructed Wetlands (ICW) as an alternative to conventional waste water treatment plants in rural villages, urban centres and for one-off dwellings throughout the county.' ([Draft0255](#))
8. At S.7.10.3 insert a new Specific Objective as follows: 'That the Planning Authority will implement a pilot scheme of ICW projects throughout the county.' ([Draft0255](#))
9. Request the implementation of SUDs and the application of Greater Dublin Strategic Drainage Study. ([Draft0257](#))
10. Opposed to development on floodplains and requests a stated commitment that proposals would not interfere with natural floodplains. ([Draft0257](#))
11. Hope that SuDs policy will be applied to front gardens and driveways/parking spaces of houses. ([Draft0158](#))
12. The Plan should ensure the adequacy of the existing water supply/wastewater treatment facilities are assessed where zoning/rezoning of lands and the introduction of new development is being proposed. This should address both capacity and performance and the potential risk to human health, water quality and water quantity. ([Draft0254](#))
13. Consider including specific objectives and measures to mitigate discharges from landfills, mines and contaminated lands to the Dodder and Camac Rivers. Noted that in 2008, the Camac River, Dodder River and Liffey River were tested as being Q2-3 (Poor Quality) in the Dublin environs. ([Draft0254](#))
14. Consideration should be given to including a specific policy to ensure inclusion of the CFRAMS results / recommendations for the Rivers Dodder and Liffey, when available. ([Draft0254](#))
15. The Plan should address, as appropriate, by way of relevant objectives, and appropriate land use zoning where relevant, the significant water management issues identified in the Water Matters Consultation publications for the ERBD RBMP and associated POM. ([Draft0254](#))
16. The Plan should promote the protection of surface water, groundwater, coastal and estuarine water resources and their associated habitats and species, including fisheries. ([Draft0254](#))
17. Reference should be made to the proposed surface water environmental quality standards set out in the Draft European Communities Environmental Objectives (Surface Waters) Regulations 2008, which address the WFD (2000/60/EC) and the Dangerous Substances Directive (2006/11/EC). When these regulations are made

- the Plan should ensure that these environmental quality standards are achieved. ([Draft0254](#))
18. Infrastructure – proposes that an implementation strategy be designed and implemented to control flash flooding in Lucan, and that Brittas be connected to the main water and sewerage systems. ([Draft0281](#))
 19. The Plan should, where possible and appropriate, include specific Policies and Objectives regarding the provision and maintenance of adequate and appropriate wastewater treatment infrastructure to service lands within the Plan area. ([Draft0254](#))
 20. Consideration should be given to addressing capacity issues at Ringsend and include a specific policy to take account of the findings of the “Greater Dublin Strategic Drainage Study” as appropriate for South Dublin. ([Draft0254](#))
 21. Reference should be made to the updated Urban Waste Water Discharges in Ireland for Population Equivalents Greater than 500 Persons – A Report for the Years 2006 and 2007, (EPA 2009), and compliance with the recommendations as relevant and appropriate to South Dublin. ([Draft0254](#))
 22. The Plan should refer to the requirement under The Waste Water Discharge (Authorisation) Regulations for all for all wastewater discharges, including storm water discharges, which come within the scope of these Regulations to be licensed. ([Draft0254](#))
 23. Consideration should be given to the inclusion of a Policy/Objective to prioritise the provision of adequate and appropriate waste-related infrastructure (recycling / recovery etc.) in advance of any significant development. ([Draft0254](#))
 24. Consideration should be given to the Planning Guidelines on flooding in “The Planning System and Flood Risk Management - (Environment, Heritage and Local Government – OPW, November 2009)”, in the context of any flood risk assessment. ([Draft0254](#))
 25. The Plan should promote the appropriate zoning of lands and restriction of use in areas liable to flooding to avoid increased risk of flooding of the lands either within or adjoining the zoned areas. A specific Policy should be included to provide for/promote appropriate flood risk assessments to be undertaken of development proposals in such areas. ([Draft0254](#))
 26. The Plan should make reference to the E.U Directive (2007/60/EC) on the assessment and management of flood risks. ([Draft0254](#))
 27. The Plan should promote the development, where appropriate, of adaptation measures to account for the likely increased risk of flooding due to Climate Change within the Plan area. ([Draft0254](#))
 28. The Plan should provide for the protection, management, and as appropriate, enhancement of existing wetland habitats where flood protection/management measures are necessary. ([Draft0254](#))
 29. The SEA and Plan making processes should address drinking water supply capacity, leakage and quality in the Plan area in the context of current drinking water supply and future requirements. This is of particular relevance in the context of the two proposed SDZ areas. ([Draft0254](#))
 30. The Plan should implement the European Communities (Drinking Water)(No.2) Regulations 2007 and should implement and include, as appropriate, the relevant recommendations set out in The Provision and Quality of Drinking Water in Ireland – A Report for the Years 2007- 2008, (EPA, 2009). Consideration should also be given to the incorporation of and reference to, the EPA’s recent Drinking Water Advice Notes 1 – 5 where appropriate and relevant for South Dublin. ([Draft0254](#))
 31. The Plan should take account of any Groundwater Protection Schemes and Groundwater Source Protection Zones data available at the Geological Survey of Ireland ([Draft0254](#))
 32. The Plan should take into account the objectives and management practices proposed by the Dublin Bay Master Plan and the Coastal Zone Management Plan, where relevant and appropriate, once it is completed. ([Draft0254](#))
 33. The Plan should include a specific objective requiring the development by the local authority, in association with relevant key stakeholders, of an “Integrated Phase Implementation Plan/Programme for Critical Water, Surface Drainage and Waste Water related infrastructure” to service the SDZ areas of Adamstown and Clonburris. Such a Plan/Programme should take into account the Phasing of the development of

the SDZ areas and the vulnerability/Water Framework Directive Risk Categories of the receiving waters in the zone of influence of the SDZ areas and the water and wastewater related infrastructure servicing these areas. The proposed implementation and phasing of the SDZ areas should also take into account any revisions to population/targets likely to be allocated via the Regional Planning Guidelines currently under review. ([Draft0254](#))

2.3 3 A Living Place

2.3.1 3.1 Housing

1. Queried the year of publication of the document: "Wastewater Treatment Manual on Treatment Systems for Single Houses. ([Draft0004](#))
2. Given the existing level of social housing in the area and the current economic climate (re unsold private units) there are serious concerns regarding further ghettoisation of this west Dublin suburb ([Draft0024](#))
3. There should be a proviso in the Development Plan that no planning permission be given to any accommodation until at least 90% of the current unoccupied properties are occupied. ([Draft0058](#))
4. Exclude any apartment blocks and at the minimum any apartment block should be no more than 2 stories high and exclude 1 bed apartments. (Please note that currently most if not all banks will not lend on 1 bed apartments. This should be taken into consideration on any proposed development.) ([Draft0065](#) [Draft0101](#) [Draft0110](#) [Draft0111](#) [Draft0112](#) [Draft0115](#))
5. The regulations governing rural housing should be relaxed and a softer interpretation of 'a genuine need to live in the area' ([Draft0071](#))
6. Objects to the eleven bay traveller accommodation within Brittas. ([Draft0071](#))
7. Remove policy H2 no upper limit clause and replace with "there shall be no new apartments given planning permission in Tallaght Town Centre until the occupancy of the current apartments reaches 85%" ([Draft0102](#))
8. Clarify the difference between the limit on units set by Tallaght LAP and new policy H2 that sets no upper limit. ([Draft0102](#))
9. Support for Policy H1. ([Draft0098](#))
10. Section 1.2.19 should make reference to concrete being a recyclable material, adaptable to refit and modified and with a much longer service life. ([Draft0100](#))
11. Section 1.2.59 - The public should be involved in the naming of new housing developments. ([Draft0107](#))
12. Please ensure that the new Development Plan 2010-2016 caters for people who are intrinsically linked to be favourably considered in all rural landscape zones. ([Draft0211](#))
13. It appears that the draft plan does not take into account the "Sustainable rural housing Guidelines 2005" or the Department Circular SP5/08 in relation to the local need policy ([Draft0212](#))
14. Local needs should be qualified equally across the landscape zones. All exclusions would be applicants who have already received permission for a local rural house. ([Draft0212](#))
15. The Council appears to have overlooked An Bord Pleanálas comments relating to the Glensamole/Bohernabreena Housing and Planning Study. ([Draft0157](#))
16. Propose the following amendment to Policy H33 "Any proposed development within the Study Area will be subject to criteria and constraints as set out in the Study in so far as they are consistent with Policies H29-31 and the Sustainable Rural Housing Guidelines (2005), giving due regard to the assessment requirements of the Habitats Directive regarding the protection of the integrity of Natura 2000 sites". ([Draft0157](#))
17. Concur totally with the statement of policy at section 1.2.14.vi Policy H6. ([Draft0157](#))
18. Recommend following addition to Section 1.2.52.ii "In genuine cases where the adult child of an elderly parent wishes to move to the area to look after the parent, the Council will give favourable consideration to modification and extension of the parent's house, to provide separate accommodation within the one structure, in preference to the building of an additional separate residence." ([Draft0157](#))

19. The Council must ensure that a shortage of quality new housing supply does not occur during the life of the new plan. ([Draft0237](#))
20. It is suggested that the 15% requirement sought for social and affordable housing should be reduced as it is not warranted in the current climate ([Draft0237](#))
21. Planning applications for residential uses or associated with agricultural use of lands within the security zone need not be subject to absolute restrictions on development when made by immediate family members of existing land owners and will be given due consideration on their height, scale and impact on the environment ([Draft0286](#))
22. Request that the Draft SDCC Development Plan 2010-2016 be amended to ensure limited rural housing should be facilitated where justifiable in the area and that planning applications in the area should be assessed with reference to eligibility criteria set out in section 9.2.1 of Bohernabreena / Glenasmole Housing Study 2002. ([Draft0243](#))
23. The eligibility criteria set out in H31 in the Draft Development Plan 2010-2016 is overly restrictive. In particular it fails to recognise the interest of persons local to or linked to rural areas who are not engaged in significant agricultural or rural resource related occupation, to live in rural areas. ([Draft0243](#))
24. Section 1.2.12 – Strategy of the Draft Development Plan should be amended to include a specific reference to a phasing strategy whereby specific zoned but uncommitted lands are identified as priority development i.e. Priority 1, Priority 2, Priority 3, in accordance with the sequential approach. In this respect, Adamstown SDZ and Clonburis SDZ should be prioritised for new development. ([Draft0255](#))
25. Recommend that the following should be inserted into Section 1.2.14 Policy H6 'In all instances, this policy will only be pursued where in-dept consultation takes place with the relevant communities concerned and when examining nearby alternative usable open space takes account all age groups ([Draft0255](#))
26. Suggests that additional lands should be made available for residential development during the life time of the next plan. The method of how the housing need was calculated should be made public. ([Draft0216](#))
27. Supports Sections 1-4 which deal with sustainable communities, in particular policies H1 and H2. ([Draft0250](#))
28. Believes that the rural housing policies are too restrictive and request the following inclusion in the Plan: "Such circumstances should also encompass a person such as a Registered General Nurse looking after an immediate elderly family member or any member of the community in a professional capacity, full or part time, that would otherwise require hospitalisation should be included as open for consideration in the new proposed plan, for planning in rural area zone 'H' ([Draft0252](#))
29. Specific suggestions regarding the need to allow individual houses to be flexible so that people do not have to move house if their circumstances change. ([Draft0158](#))
30. Reiterate need to integrate fully the social and affordable element of any development. ([Draft0158](#))
31. The Council appears to have overlooked An Bord Pleanála's comments relating to the Glensmole/Bohernabreena Housing and Planning Study. ([Draft0196](#))
32. Propose the following amendment to Policy H33 "Any proposed development within the Study Area will be subject to criteria and constraints as set out in the Study in so far as they are consistent with Policies H29-31 and the Sustainable Rural Housing Guidelines (2005), giving due regard to the assessment requirements of the Habitats Directive regarding the protection of the integrity of Natura 2000 sites". ([Draft0196](#))
33. Concur totally with the statement of policy at section 1.2.14.vi Policy H6. ([Draft0196](#))
34. Recommend following addition to Section 1.2.52.ii "In genuine cases where the adult child of an elderly parent wishes to move to the area to look after the parent, the Council will give favourable consideration to modification and extension of the parent's house, to provide separate accommodation within the one structure, in preference to the building of an additional separate residence." ([Draft0196](#))
35. Housing – no structure and out of keeping with the local area to be developed on Kennelsfort Road Palmerstown or Griffeen Road Lucan ([Draft0281](#))
36. Reference should be made as appropriate to the Code of Practice: Wastewater Treatment and Disposal Systems Serving Single Houses (p.e < 10), (EPA, 2009). ([Draft0254](#))

37. Notes that in relation to Residential Care Centres that SDCC has made no attempt to address the planning concerns that residents have highlighted. ([Draft0258](#))

2.3.2 3.2 Soc Incl. Community Facilities and Recreation

1. The amenity grounds (Coldcut Road Clondalkin Dublin City Services Sports and Social Club) are the only safe and continually monitored recreational grounds within North Clondalkin ([Draft0024](#))
2. A lot more green areas are needed in particular in Cookstown ([Draft0025](#))
3. Tallaght village Area needs more green space ([Draft0058](#))
4. Reinstate the Pocket Park that was previously allowed for in the zoning of the Main Road at the site of MPI (now Lidl). ([Draft0065](#) [Draft0101](#) [Draft0110](#) [Draft0111](#) [Draft0112](#) [Draft0115](#))
5. Requests that the Plan acknowledge the role the various indoor facilities have to play with respect to tourism, such as the National Basketball Arena. (Section 1.3.35) ([Draft0014](#))
6. The Plan should include the phrase 'and accompanying map' after 'Asset Management Plan'. (Policy SCR52) ([Draft0014](#))
7. Seeks the removal of the "Primary School" Objective having regard to the number of existing schools, which serve the area ([Draft0066](#))
8. Purchase Coats' Land and enlarge Waterstown Park ([Draft0105](#) [Draft0137](#) [Draft0138](#) [Draft0144](#))
9. Cooldrinagh lands should be made into a public park ([Draft0105](#))
10. Too much concentration of funding for the arts in Tallaght, with the virtual exclusion of other areas; such as Lucan- Balance should be redressed ([Draft0105](#) [Draft0137](#) [Draft0138](#) [Draft0144](#))
11. request that Rathcoole Park should be maintained in order to provide biodiversity corridors for wildlife between Rathcoole Park and the hinterlands of Rathcoole ([Draft0154](#))
12. A contribution towards the development of the Park was made by the community in 1991 to ensure that the community had an amenity area for generations to come. This contribution was given to the Council in good faith that Rathcoole Park would be preserved as a green space for residents and wildlife ([Draft0154](#))
13. Would like to support the inclusion of a playground within Rathcoole Park ([Draft0154](#))
14. The provision of schools within Magna Business Park, zoned for Enterprise and Employment Use, is not in our view an appropriate location for such a use from a sustainable development and a health and safety perspective ([Draft0201](#))
15. With regard to the operation of Tallaght Stadium The Development Plan must state that they will always fully respect and fully comply with all the conditions in the planning permission granted by the County Council, An Bord Pleanála and the High Court. ([Draft0123](#))
16. The County Development plan speaks for ordinary people, Councillors, Managers and Officials must engage directly with local communities, take due account of the needs, aspirations and concerns of people who live near Council amenities and give protection to the people of the County in their homes ([Draft0123](#))
17. Recommend new Policy "that it is the policy of the County Council to recognise the needs for sustainable development of existing schools and educational institutions for their sites, and to help them remove the obstacles and unblock the blockages to their development" ([Draft0132](#) [Draft0231](#))
18. Request that policy SCR28 Location of Childcare and Pre-school Facilities, should read adjacent to primary school and secondary school campuses. ([Draft0132](#) [Draft0231](#))
19. Would like to see Development plan taking into consideration additional amenities for the large built up areas such as Lucan/Clondalkin/Newcastle and Rathcoole instead of rezoning additional and unnecessary lands from agricultural to EP3 ([Draft0159](#))
20. Section 1.3.21 page 60 of the Plan states that the Council will require smaller developments to pay a development contribution to enable appropriate childcare provision to be made elsewhere. This provision should be removed as it is ultra vires to the Planning and Development Act. ([Draft0237](#))

21. Recommend that Policy SCR62 of the Draft Development Plan be amended as follows: 'It is the policy of the Council that in areas zoned residential of mixed development that a proportionate area of land for allotment use be required and encouraged where the development proposed is substantially or completely apartment style development.' ([Draft0255](#))
22. Request that St. Cuthberts Park be provided with a community centre. ([Draft0245](#))
23. Request that the Council increase allotment usages by developing more of them within the county. ([Draft0245](#))
24. Request that Policy SCR52 be relocated to Theme 3 and that it should be expanded to include an array of country recreational activities and should be cross-referenced to Section 2.2.14. ([Draft0018](#))
25. Would like to see some mention of protection/promotion of native flora and fauna and biodiversity under Urban Forestry policy, as in the Green Routes policy. ([Draft0158](#))
26. As none of the current allotment sites are situated on land which is or proposed to be zoned for development, the submission questions how relevant is the statement in final paragraph of 1.3.41 ([Draft0158](#))
27. Section 1.3.20 School and College Sites ([Draft0282](#))
28. Corkagh Park be enhanced to encourage more local use ([Draft0281](#))
29. Playgrounds - endorses the inclusion of a playground in Rathcoole Park and proposes playgrounds be provided in Palmerstown and Liffey Valley area of Lucan; endorses proposals for open spaces and a park in the Newcastle LAP, and proposes development of a playground within the park: ([Draft0281](#))
30. Community Services – proposes the provision of a community centre, an enterprise centre and a health centre in Newcastle; retention of the manor road health clinic and provision of a library in Palmerstown; proposes the Deansrath health centre cater for the Bawnogue area and that a site be identified for relocation of the Bawnogue Family resource Centre. ([Draft0281](#))
31. Proposes the provision of a secondary school site in Lucan. ([Draft0281](#))
32. Alarmed that certain open spaces are being 'rezoned' ([Draft0258](#))
33. Notes that SDCC has failed to recognise that play and recreation facilities are in fact infrastructure and have to be planned for ([Draft0258](#))
34. Notes that there is an inconsistency in the manner in which SDCC protects their open spaces compared with other neighbouring local authorities ([Draft0258](#))
35. Object to the proposal that the residents of the Owendoher Haven will lose their green open space as part of extension/redevelopment of the site ([Draft0258](#))
36. Department of Education and Scenice requests that site reservations be made as close as possible to existing community facilities such as sports facilities/libraries etc. so that they can be shared. ([Draft0282](#))
37. The Dept. Education and Science are open to the concept of multi-campus arrangements ([Draft0282](#))
38. Highlight the need to consult the Dept. of Education and Science in the assessment of specific school sites. ([Draft0282](#))

2.3.3 3.3 Sustainable Neighbourhoods

1. States that concrete construction directly supports Policies SN33 Section 1.4.37.iv and SN34 in Section 1.4.40.i. ([Draft0100](#))
2. Opposes the naming of the R405 and R120 as regional distributor roads because they have been constructed as local rural roads. ([Draft0107](#))
3. • Use of materials in green-routes should be considered first and foremost for their suitability for the natural environment, the minimal disruption their installation occasions, and their ability to blend in with the natural landscape. Routing of same should be considered in the context of minimal alteration of the existing landscape and its features. ([Draft0137](#) [Draft0138](#))
4. In section 1.4.3. we propose the addition of the following paragraphs: Recommend following addition to section 1.4.3.v Pedestrian/Vehicular segregation; "The segregation of pedestrian and vehicular use. This can be achieved by servicing developments peripherally, and creating inner spaces, free of cars, where social communication is encouraged, and where safe children's play facilities can be

- included.” Dedicated pedestrian and cycle routes clearly segregated from vehicular use ([Draft0157](#))
5. Concern regarding Section 1.4.4.vi City Village Concept-In this connection, the selection of “left-over” sites for the concentration of social and affordable housing is not satisfactory, is contrary to the objective in the above paragraph, and creates ghettoisation. ([Draft0157](#))
 6. Suggest addition to be inserted after Par 1.4.7;“In all proposals to open up new areas involving 20 or more residences, applications should be assessed by a panel of at least three eminent independent architects and town planners for the quality of design and arrangement ([Draft0157](#))
 7. Suggest addition to Section 1.4.16 “It is a policy of this Council that – • Applications for landmark buildings of 8 storeys or over shall be of exceptional architectural quality, and shall be assessed by a panel of three eminent independent architects. • Environmental impact assessment shall be required for all applications for high buildings, with particular regard to climatic (wind funnelling) effects, shadowing, and visual impact on adjacent areas. • In view of the national and international objectives to reduce energy consumption, the energy balance per occupant shall be assessed, and any increase in height resulting in increase per capita energy requirement shall not be permitted. • A study shall be set up to identify areas and sites suitable for high buildings.” ([Draft0157](#))
 8. South County Council should avoid being too prescriptive in the implementation of the new plan. National guidelines such as the Sustainable Residential Development in Urban Areas do not prescribe any rigid standards for e.g. private amenity space. The Guidelines encourage planning authorities to be flexible in their approach to urban positioning and design ([Draft0237](#))
 9. Planning activities should focus on the location and quality of sustainable commercial, retail and residential development to ensure local communities continue to be revitalised, rejuvenated and created. ([Draft0237](#))
 10. Policy SN30 states that Council Policy is to promote appropriate renewable energy, with particular reference to residential development. According to the Plan, the use of on-site micro renewables or district heating systems will offer significant opportunities. While it is noted that ‘environmental’ initiatives are being provided by South County Council in the plan it must be stressed that some initiatives have not been tried and tested in the marketplace. Such environmental initiatives should be treated as a ‘pilot projects’. Developers who are conditioned to provide for such initiatives must be grant aided by the Council in request of these requirements. Such additional costs are prohibitive in the current economic environment, and will act as a deterrent for promotion of future development ([Draft0237](#))
 11. Encourage new construction of appropriate ‘signature’ buildings, and avoid adopting too prescriptive an approach in terms of the built environment (including density and building height). ([Draft0237](#))
 12. Section 1.4.16..ii Determining Building Heights- Requests that building heights in Tallaght village and other villages should not exceed 3 storeys including penthouses, as previously required in the Tallaght Town Centre Plan 2000 ([Draft0130](#))
 13. Suggest clothes drying facilities should be outdoors where at all possible and that the policy be applied to nursing home or retirement village development ([Draft0158](#))
 14. In section 1.4.3. we propose the addition of the following paragraphs: Recommend following addition to section 1.4.3.v Pedestrian/Vehicular segregation; “The segregation of pedestrian and vehicular use. This can be achieved by servicing developments peripherally, and creating inner spaces, free of cars, where social communication is encouraged, and where safe children’s play facilities can be included.” Dedicated pedestrian and cycle routes clearly segregated from vehicular use 1.4.4.vi City Village Concept A City Village concept encouraging a mix of uses and of sizes and types of residences. This should involve, e.g. the total integration of affordable housing and the availability, within walking distance of schools, shops and essential services. It will be an objective of the Plan that the requirement of Section 94 (4)(c) of the Planning and Development Act, 2000, be generally applied, and that the alternatives allowed to be considered under Section 96 be not generally invoked. [In this connection, the selection of ‘left-over’ sites for the concentration of social and

- affordable housing is not satisfactory, is contrary to the objective in the above paragraph and creates ghettoisation]. ([Draft0196](#))
15. Concern regarding Section 1.4.4.vi City Village Concept-In this connection, the selection of “left-over” sites for the concentration of social and affordable housing is not satisfactory, is contrary to the objective in the above paragraph, and creates ghettoisation. ([Draft0196](#))
 16. Suggest addition to be inserted after Par 1.4.7;“In all proposals to open up new areas involving 20 or more residences, applications should be assessed by a panel of at least three eminent independent architects and town planners for the quality of design and arrangement ([Draft0196](#))
 17. Suggest addition to Section 1.4.16 “It is a policy of this Council that – • Applications for landmark buildings of 8 storeys or over shall be of exceptional architectural quality, and shall be assessed by a panel of three eminent independent architects. • Environmental impact assessment shall be required for all applications for high buildings, with particular regard to climatic (wind funnelling) effects, shadowing, and visual impact on adjacent areas. • In view of the national and international objectives to reduce energy consumption, the energy balance per occupant shall be assessed, and any increase in height resulting in increase per capita energy requirement shall not be permitted. • A study shall be set up to identify areas and sites suitable for high buildings ([Draft0196](#))

2.4 4 A Protected Place

2.4.1 4.1 Archaeological and Architectural Heritage

1. Request SLO for the rehabilitation and reuse Esker House by a relaxation of the authority's Development Management requirements ([Draft0037](#))
2. OPW responsible for Monuments in State Care- Tully's Castle and the Round Tower, Church and Cross, Clondalkin- Recommend these monuments be specifically listed in the Plan and any development proposals be referred to OPW for consideration. ([Draft0095](#))
3. Plan should include commitments to protect associated qualities of Monuments in State Care such as views and prospects and ensure sympathetic development adjoining the sites. ([Draft0095](#))
4. OPW will continue to work with SDCC to improve the setting of Rathfarnham Castle and improve the amenity and cultural value of the Castle. ([Draft0095](#))
5. St Enda's Park and Pearce Museum- Hope to build on the good working relationship with SDCC and continue the successful programme of temporary exhibitions, children's workshops, concerts, lectures, nature study evens and horticultural demonstrations ([Draft0095](#))
6. Request that a preservation order be put on the mass/community centre; that a survey of all historical and archaeological sites in the Brittas area be carried out and preserved and that the Council construct a 'bretasche' in the grounds of the community centre. ([Draft0071](#))
7. Shackleton's Mill and Weir and the Guinness Bridge should be jointly managed by Fingal and South Dublin – formal arrangements be entered into with Fingal Co Co to renovate these and maintain ([Draft0105](#) [Draft0137](#) [Draft0138](#) [Draft0144](#))
8. DEHLG/ICF Archaeological Code of Practice should be noted in Section 4.2.3. ([Draft0100](#))
9. Policy AA8 In accordance with Policy AA8, request that the western side of Newcastle village be designated as an Architectural Conservation Area as it contains many significant buildings. ([Draft0107](#))
10. The removal and destruction of key vernacular buildings, notably The Glebe by means of fire, allowing building to fall into disrepair should be arrested. ([Draft0154](#))
11. Request that special attention be paid to the range and type of architectural and cultural heritage in Rathcoole by designating it as a Architectural Conservation Area ([Draft0154](#))
12. The strategies and policies for the conservation of archaeological and architectural heritage are sound. ([Draft0157](#))

13. Suggest the following addition to paragraph 4.2.5-“Consideration shall be given to the protection of good buildings or groups of buildings of the late 19th century or later, including modern structure of exceptional quality.” ([Draft0157](#))
14. Recommend, after Par 4.2.9.v the following: “In the case of protected buildings that are in poor condition, requiring expensive restoration, favourable consideration shall be given to applications for sensitively designed conversions/extensions of the protected building or appropriate development within its curtilage, so that the benefit gained from the development can contribute towards the cost of restoration, where the alternative outcome could be the building’s decline and eventual dereliction.” ([Draft0157](#))
15. It is recognised that modern standards of energy conservation cannot be applied retrospectively, and that relative inefficiency in energy performance shall not be used as a reason to justify intervention of a nature or degree seriously compromising the integrity of the heritage structure, or its demolition. ([Draft0157](#))
16. Policy AA1 – Archaeological Heritage Request that point b) be amended to incorporate access routes as public rights of way. ([Draft0018](#))
17. Tallaght Architectural Conservation Area should include the two cottages located on the old Greenhills Road. ([Draft0158](#))
18. Wherever the words “where appropriate” are used in relation to the protection and retention of built or natural heritage they should be replaced with the words “as a matter of priority”. ([Draft0158](#))
19. Suggest the addition of a policy whereby the Council commits itself to bringing the full rigour of the law against any property owner who allows a protected structure to fall into a neglected state or fails to protect it so that it is vandalised. ([Draft0158](#))
20. Propose that the extensive range of mill structures and related features in the townlands of Corkagh, Corkagh Demesne and Fairview be designated as an ‘Architectural Conservation Area’. ([Draft0158](#))
21. The strategies and policies for the conservation of archaeological and architectural heritage are sound. ([Draft0196](#))
22. Suggest the following addition to paragraph 4.2.5-“Consideration shall be given to the protection of good buildings or groups of buildings of the late 19th century or later, including modern structure of exceptional quality.” ([Draft0196](#))
23. Recommend, after Par 4.2.9.v the following: “In the case of protected buildings that are in poor condition, requiring expensive restoration, favourable consideration shall be given to applications for sensitively designed conversions/extensions of the protected building or appropriate development within its curtilage, so that the benefit gained from the development can contribute towards the cost of restoration, where the alternative outcome could be the building’s decline and eventual dereliction.” ([Draft0196](#))
24. It is recognised that modern standards of energy conservation cannot be applied retrospectively, and that relative inefficiency in energy performance shall not be used as a reason to justify intervention of a nature or degree seriously compromising the integrity of the heritage structure, or its demolition.” ([Draft0196](#))
25. Lyons Hill Newcastle be designated an historical and protected area ([Draft0281](#))
26. An Endangerment Audit of all Protected Structures should be immediately undertaken as a priority in this Development Plan. ([Draft0258](#))

2.4.2 4.2 Landscape, Natural Heritage and Amenities

1. An endorsement of the Towards A Liffey Valley Park report and stated objective to support its implementation would be welcome. ([Draft0095](#))
2. The Griffeen River should be subject to environmental designation and an assessment carried out under Article 6 of the Habitats Directive 92/43/EEC. ([Draft0063](#) [Draft0107](#))
3. Believes that ‘protected views’ will be an obstacle to development in the Brittas area. ([Draft0071](#))
4. The Dodder Valley should be developed as a high amenity area. ([Draft0102](#))
5. Section 1.3.4 of Draft Plan refers to the Dodder Valley, the only part of the Dodder Valley that is protected is in Rathfarnham, there is no mention of Tallaght. ([Draft0102](#))

6. Request a detailed map showing all areas of the Dodder valley that will be zoned as high amenity and highlighting any land to be rezoned ([Draft0102](#))
7. Ensure no housing development near the Dodder in the area of the Old Mill ([Draft0102](#))
8. All lands between the Liffey Valley and the Palmerstown Rd, N4, Lucan Rd and N4 to the border with Kildare should be defined as the Liffey Valley and given a zoning similar to the Dublin Mountains Zoning, with similar protection ([Draft0105](#) [Draft0144](#))
9. Insert paragraph in the CDP specifying that there will be a presumption for no development onlands at the Liffey Valley and that applications will only be considered in exceptional circumstances ([Draft0105](#) [Draft0144](#))
10. Council should take action to support the extension of the Liffey Valley SAAO, engage proactively with the 3 Councils bordering the valley in ensuring the Valley is protected across County Boundaries ([Draft0105](#) [Draft0144](#))
11. Request for no further crossings of the Liffey for the extent of the County Boundary ([Draft0105](#) [Draft0137](#) [Draft0138](#) [Draft0144](#))
12. Include four new Prospects for which it is an objective to protect. This is the view from the N4 across the Liffey Valley and through the Valley and as these are exceptional vistas New views: N4(Between M50 roundabout and Woodies Junction)- Liffey valley Lucan Rd (Between Woodies Junction and through Lucan Village, via Lucan Road,The Old Hill, Main Street, Lucan Road, to N4 underpass)- Liffey Valley N4 (Between Woodies Junction and County Boundary with Kildare)- Liffey Valley Hermitage Golf Club- View through and across the Liffey Valley looking east from the Clubhouse, as far as the spire and the pigeon house ([Draft0105](#) [Draft0137](#) [Draft0138](#))
13. Need to provide biodiversity corridors and areas where priority consideration is afforded to wildlife ([Draft0105](#) [Draft0144](#))
14. The pNHA of the Grand Canal should be protected as an amenity for biodiversity first and foremost over and above any other objective ([Draft0105](#))
15. Protection should be afforded to key hedgerows, and a policy of maintaining hedgerows and their natural diversity should be specified ([Draft0105](#) [Draft0137](#) [Draft0138](#) [Draft0144](#))
16. NPWS Guidance on Biodiversity should be noted in Section 4.3 of the Draft Plan. ([Draft0100](#))
17. Supports Policy LHA34 and requests that the right of way from Relickeen Lane, Loughtown/Brownstown to the Grand Canal be recoded and maintained by the Council. ([Draft0107](#))
18. The Liffey Valley should be afforded the same protection as the Dublin Mountains. ([Draft0117](#))
19. The Liffey Valley SAAO should be expanded to protect the lands at St Edmundsbury/Woodville. ([Draft0117](#))
20. We submit that all lands in the Liffey Valley (I.E, all lands between the River Liffey and the Palmerstown Rd, N4, Lucan Rd and N4, to the Border with Kildare) should be defined as the Liffey Valley and given a zoning similar to the Dublin Mountains zoning, with similar protection. ([Draft0137](#) [Draft0138](#))
21. Submit that there should be a paragraph in the CDP specifying that there will be a presumption for no development on the Liffey Valley Lands and that applications will only be considered in exceptional circumstances. e.g the expansion of schools, or other necessary educational or institutional development. ([Draft0137](#) [Draft0138](#))
22. Submit that in the context of South Dublin, the SAAO should be extended to cover the Liffey Valley area ([Draft0137](#) [Draft0138](#))
23. Practices to remove older and unsound trees serve to negate the import function they provide as habitats and food sources, and demonstrate an inappropriate perception of the balance of interests that need to be served in an environment which has been for too long exploited for the interests of developers and levies. ([Draft0137](#) [Draft0138](#))
24. There appears to be no mention of species protected under National Law. apart from protecting their habitats and wildlife corridors where possible (Policy LAH19). It is important to note that such species are protected wherever they occur and not just in designated sites or wildlife corridors. It is recommended that mention be made of protected flora and fauna under National as well as EU law. ([Draft0164](#))

25. Bat species are protected under both National and EU law and the policy relating to lighting of key buildings and the Liffey Bridge within the Plan for Lucan has the potential to impact adversely on bat species where they are present. ([Draft0164](#))
26. Care must be taken to ensure that the provision of amenities such as footpaths, to give access to the waterways, do not result in adverse impacts on protected flora, fauna or habitats ([Draft0164](#))
27. When considering the provision of facilities in the Liffey Valley or Slade of Saggart, care should be taken to ensure that such amenities do not detract from the scientific interest of the sites. ([Draft0164](#))
28. It is recommended that the boundaries of SAC and pNHA are checked with the National Parks and Wildlife Service of this Department prior to finalising the Plan, as boundaries can change from time to time ([Draft0164](#))
29. Under section 2.3.1.2 of the Appropriate Assessment Screening, the Department welcomes the intention to protect feeding areas of greylag geese that roost on the Poulaphouca Reservoir SPA by subjecting proposed developments in this area to impact assessment. However, there does not appear to be any cross-reference to this in section 3 of the Plan. ([Draft0164](#))
30. Request Policy LHA22 Dublin Mountain Zones, as detailed in section 4.3.9.i, ‘..to conserve the character of the Dublin Mountain and high amenity zones’ be extended to afford protection of Windmill Hill. ([Draft0154](#))
31. Request the inclusion of Windmill Hill, Lyons Hill in table 4.3.1 Prospects for which it is an objective to protect. Viewing point is the Naas Rd (Brown’s Barn area to include the prospect of Windmill Hill. ([Draft0154](#))
32. Submit that the SAAO should be extended to cover the Liffey Valley area as described in the section on zoning ([Draft0154](#))
33. The plan should recognise the extraordinary pressure our biodiversity has experienced in the context of the rapid development of the Greater Dublin Area and vast tracts of South Dublin County ([Draft0154](#))
34. Proposal for amendment, by way of additional wording, to Policy LHA25 at Paragraph 4.3.9.ii – Area of Special Amenity – Boherbreena Reservoirs (page 216) in order to state clearly that such strategy be specific in relation to access to the Upper Reservoir for disabled or mobility-impaired persons. Suggested additional wording is as follows: ‘A specific objective of such a joint strategy will be to achieve access to the Upper Reservoir at the Castlekelly entrance for persons with a disability/mobility impairment’. ([Draft0195](#))
35. Suggested additions to Views and Prospects: 1/ Cul-de-sac off North side of R114 on the West side of Belgard Deer Park starting at the “Famine Cross” and leading up to Knockanvinidee Hill (both sides full length). 2/ North to South minor road from Ballymaice to R114, East of Belgard Deer Park (East Side only). 3/ Road from South side of R114 starting at “Famine Cross” and leading to the East of Black Hill and to Ballinascorney Upper and beyond to the County Boundary (both sides). 4/ All the roads between “St. Anne’s” on the East side of the Upper Bohernabreena Reservoir leading South to Castlekelly Bridge (adjoining Cunard) and beyond (both sides). 5/ Tibbradden Road – Map 5B – (both sides). ([Draft0157](#))
36. Suggested Prospects; Killakee Road from Killakee Cottage to Cruagh Road Junction Killakee Rd/Military Rd to County Boundary (Featherbed Road Cruagh Rd from Alpine Lodge to Ballybrack Rd Junction Cruagh Rd from Killakee Rd to Ballybrack Junction Tibbradden Road. ([Draft0157](#))
37. Recommend the following addition: 4.3.9 xiv Wildlife corridors shall be preserved wherever possible. ([Draft0157](#))
38. Recommend the following addition:4.3.9.xv In public parks and open spaces there shall be a policy to establish “wild spaces”, a provision for encouraging biodiversity and natural wildness ([Draft0157](#))
39. Recommend the following addition: 4.3.9. xvi. The Council intends to commission a survey of trees in the county, with a view to identifying trees, woodlands, or copses of exceptional interest, and to give them protection, and also to identify locations appropriate for new planting in the interest of urban landscaping. ([Draft0157](#))
40. See the loss of our greenbelts as a detriment to our wildlife and open spaces ([Draft0159](#))

41. Suggests that the Council recognises that increasing biodiversity in the vicinity of airports may not be achievable due to the threat posed to aircraft by bird activity. ([Draft0218](#))
42. Support for LHA 26 – Dodder Valley Linear Park. It is hoped that it will provide a gateway to the Dublin Mountains and facilitate a tourist centre. ([Draft0208](#))
43. At Policy LHA32 and Section 1.3.34 of the Draft Development Plan amend to include policy statement as follows: 'It is the policy of the Planning Authority to seek the provision of at least 1 new tree per every 100m² of land area of the county' ([Draft0255](#))
44. The Bohernabreena Reservoir and the Rivers Dodder and Liffey are exceptional in the area with regards to supporting Atlantic salmon and therefore should be protected and the Plan should make clear that salmonid waters constraints apply to any development in this area. ([Draft0257](#))
45. The Fisheries Board requests the designation of lands adjacent to surface waters, particularly salmonid systems as areas of open preservation. ([Draft0257](#))
46. Request that best management practice should be implemented at all times in relation to any activities that may impact on riverine or riparian habitats. ([Draft0257](#))
47. Sufficient treatment capacity should be available both within the receiving sewerage system locally and downstream at the relevant Waste Water Treatment Plant to ensure ecological integrity. ([Draft0257](#))
48. An undisturbed buffer zone between development area and river bank should be maximised. ([Draft0257](#))
49. Request the planting of trees along the N7 especially from Kingswood through to the Red Cow interchange. ([Draft0288](#))
50. Section 4.3.6 Request a policy on access to the natural heritage. ([Draft0018](#))
51. Policies LHA3-7 The following should be added to each policy: "within two years of the adoption of the development plan." ([Draft0018](#))
52. Policy LHA10 Delete 'Will Seek'. ([Draft0018](#))
53. Policy LHA16 • Request that this policy be relocated to Theme 3 Section 2 and that after development in the 2nd paragraph 'including private forestry' be included. • The following paragraph should be added: "The Council will encourage recreational activities including walking, mountain biking (preferably on dedicated trails), orienteering and other non-noise generating activities." • The first line of the final paragraph should be deleted. • The following policies should be added: 'Forestry should not obstruct existing rights of way or traditional walking routes' and 'it is the policy of the Council to identify existing rights of way and traditional walking routes and established walking routes before planting commences.' • Protect access routes to upland walk and rights of way ([Draft0018](#))
54. Policy LHA21 – Watercourses Request that the following policies be included: • Land adjacent to river banks and lakes will be reserved for public access and the council will create linear parks to facilitate walking/cycling routes. • In partnership with the national Park and Wildlife Service, Waterways Ireland and other relevant stakeholders to facilitate public access to and understanding of waterway corridors and wetlands where feasible and appropriate. • Require pedestrian routes along rivers with increased public access. • Rivers should have recreational potential. ([Draft0018](#))
55. Seeks the expansion of Policy LHA23 – Geological Features ([Draft0018](#))
56. LHA27 Request that the following phrase be added " promote the extension of the Park to adjoining mountain areas. ([Draft0018](#))
57. LHA29 Request that other suitable activities should include scrambler bikes and quads. ([Draft0018](#))
58. LHA33 – Access to Forest and Woodland Areas Request an additional policy that the Council will attempt acquire Cruagh Wood, Montpelier Hill (Hellfire Club) and Massey Estate and others from Coilte. ([Draft0018](#))
59. LHA 34 Public Rights of Way Request that all except the 2nd paragraph be deleted and replaced by: • A list of existing public rights of way within one year of adoption of plan to include maps • Protect, preserve, promote, enhance, improve and maintain, for the common good, existing rights of way • Create new rights of way, as required, or extend existing rights of way either by agreement by or by way of compulsory powers in the interest of ensuring access to amenities. In particular, rights of way

- should be provided from built up areas to the countryside. • Prohibit development and keep free from obstruction existing rights of way and walking routes and take legal action if necessary to prevent any attempt to close them off. • Prohibit development which would prejudice public access to existing rights of way, unless specific arrangements are made for suitable alternative linkages. • Look favourably upon planning applications which include proposals to improve the condition and appearance of existing rights of way. • Developments will not be permitted where a public way will be affected unless the level of amenity is minimised by; i. The footpath/bridleway being diverted by the minimum practical distance and the route continuing to be segregated from vehicular traffic ii. Appropriate legal procedures have been undertaken to extinguish the existing right of way and to establish the new right of way to replace it. • Existing rights of way and established walking routes shall be established prior to any new planting, new infrastructural development and any new energy/telecommunication developments. ([Draft0018](#))
60. Policy LHA35 In penultimate paragraph insert 'Keep Ireland Open' after 'partnership'. ([Draft0018](#))
 61. Support for Policy LHA12, LHA15, LHA22, LHA25, LHA28 and LHA36 ([Draft0018](#))
 62. 4.3.9.v LHA26 Dodder Valley linear Park- Suggest that the proposed bridge between Oldcourt and Kiltipper be an elevated design to leave the river bank for walkers etc. ([Draft0130](#))
 63. More local representation on the heritage committees and working groups need to be progressed. Individuals with local knowledge need to be included, to broaden the perspective and inform the plan, ([Draft0139](#))
 64. The " heritage park" identified for the Firhouse Weir area should be extended to the old Bawn Weir, and include the tourism amenity based on the historical mills which were a feature along the Dodder. ([Draft0139](#))
 65. Suggest inclusion in Table 4.3.1 of the viewing point from former outbuildings of Corkagh House/Parks Depot/Rose Garden towards the Naas Road and the Dublin Mountains ([Draft0158](#))
 66. Welcome proposed TPO study and suggest public should be invited to submit specimens for inclusion. ([Draft0158](#))
 67. Suggests that the 10m buffer is very tight, especially given recent flooding experiences in various parts of the country, and suggest that it should be 15m ([Draft0158](#))
 68. Recommend that no development be permitted higher than the 300m contour to afford appropriate protection to the County's Natura 2000 sites. ([Draft0255](#))
 69. Suggested additions to Views and Prospects: 1/ Cul-de-sac off North side of R114 on the West side of Belgard Deer Park starting at the "Famine Cross" and leading up to Knockanvinidee Hill (both sides full length). 2/ North to South minor road from Ballymaice to R114, East of Belgard Deer Park (East Side only). 3/ Road from South side of R114 starting at "Famine Cross" and leading to the East of Black Hill and to Ballinascorney Upper and beyond to the County Boundary (both sides). 4/ All the roads between "St. Anne's" on the East side of the Upper Bohernabreena Reservoir leading South to Castlekelly Bridge (adjoining Cunard) and beyond (both sides). 5/ Tibbradden Road – Map 5B – (both sides). ([Draft0196](#))
 70. Suggested Prospects; Killakee Road from Killakee Cottage to Cruagh Road Junction Killakee Rd/Military Rd to County Boundary (Featherbed Road Cruagh Rd from Alpine Lodge to Ballybrack Rd Junction Cruagh Rd from Killakee Rd to Ballybrack Junction Tibbradden Road. ([Draft0196](#))
 71. 4.3.7.vi it is recommended that mention be made in the plan of flora and fauna species which are protected under National Law wherever they occur and not just in designated sites or wildlife corridors. ([Draft0283](#))
 72. Recommend the following addition: 4.3.9 xiv Wildlife corridors shall be preserved wherever possible. ([Draft0196](#))
 73. Recommend the following addition:4.3.9.xv In public parks and open spaces there shall be a policy to establish "wild spaces", a provision for encouraging biodiversity and natural wildness ([Draft0196](#))
 74. Recommend the following addition: 4.3.9. xvi. The Council intends to commission a survey of trees in the county, with a view to identifying trees, woodlands, or copses of

- exceptional interest, and to give them protection, and also to identify locations appropriate for new planting in the interest of urban landscaping. ([Draft0196](#))
75. The policy relating to lighting of key buildings and the Liffey Bridge has the potential to impact adversely on protected bats, which are protected under both National and EU law. ([Draft0283](#))
 76. Care should be taken to ensure that the provision of amenities such as footpaths to give access to waterways or are located in pNHAs do not result in adverse impacts on protected flora, fauna or habitats or detract from the scientific interest of designated sites. ([Draft0283](#))
 77. The boundaries of the SAC and pNHA areas should be checked with the NPWS prior to finalising the plan as boundaries can change from time to time. ([Draft0283](#))
 78. Welcome the intention to protect feeding areas of greylag geese that roost on the Poulaphouca Reservoir SPA by subjecting proposed development in this area to impact assessment; however there appears to be no cross reference to this in section 3 of the plan. ([Draft0283](#))
 79. The Liffey Valley Park be deemed a National Park ([Draft0281](#))
 80. The Plan should provide for the protection, management, and as appropriate, enhancement of existing wetland habitats where flood protection/management measures are necessary. ([Draft0254](#))
 81. Consider inclusion of a Policy/Objective to manage and mitigate against invasive species / noxious weeds as relevant to South Dublin. ([Draft0254](#))
 82. The Plan should consider amending Policy LHA19 to include the protection of species at risk, as appropriate. ([Draft0254](#))
 83. Consideration should be given to the inclusion of a Policy/Objective for a phased and co-ordinated programme of Habitat Mapping (including wetlands) of the Plan area. This mapping should assist in identification of potentially significant sensitive ecological sites. ([Draft0254](#))
 84. Consideration should also be given to the necessity for habitat mapping to better implement LHA19. ([Draft0254](#))
 85. Consideration should be given to including a new Policy (or amending Policy LHA9) to more clearly state the requirement for Appropriate Assessment screening of all proposed amendments to the adopted Plan and any projects, which may arise subsequent to adoption of the Plan. ([Draft0254](#))
 86. The Plan should include a specific Policy/Objective to take into account the objectives and management practices proposed in available Management Plans for designated natural heritage sites. ([Draft0254](#))
 87. The Plan should promote the provision/application of appropriate buffer zones between designated ecological sites and areas zoned for development. ([Draft0254](#))
 88. The Plan should promote the setting up of procedures to ensure compliance with the requirement of Article 6 of the Habitats Directive. ([Draft0254](#))
 89. The Plan should also refer to the protection of Annex I- Habitats and Annex II -Animal and Plant species of "Council Directive 92/43/EEC on the conservation of natural habitats and wild fauna and flora". ([Draft0254](#))
 90. Consideration should be given to the inclusion of a Policy to review existing Landscape Character Areas for South Dublin, and identify vulnerability and adequate protection of landscapes and visual corridors. ([Draft0254](#))
 91. The Plan should promote the protection of designated scenic landscapes, scenic views, scenic routes and landscape features of regional, county and local value. The Plan should also take into account the landscape character and landscape features and designations adjoining the Plan area. ([Draft0254](#))
 92. Consideration should also be given to promoting the requirement for an appropriate "Visual Impact Assessment" for proposed development with potential to impact adversely on significant landscape features within the Plan area. Consideration should also be given to the promotion of the designation, and use of, agreed and appropriate viewing points for these assessments. ([Draft0254](#))
 93. The Plan should promote the recognition of visual linkages between established landmarks and landscape features and views which should be taken into account when land is being zoned and when individual development proposals are being assessed / considered within the Plan area. ([Draft0254](#))

2.4.3 4.3 SEA

1. Do not believe that the SEA conducted meets with the statutory requirements and will need to be substantially revisited before the process can be successfully concluded legally ([Draft0105](#) [Draft0137](#) [Draft0138](#) [Draft0144](#))
2. Absence of a Biodiversity Action Plan and other Biodiversity Studies and flood assessment are major deficiency- County Plan cannot be considered in the absence of these and other matters ([Draft0105](#) [Draft0137](#) [Draft0138](#))
3. Disagree with the position that appropriate assessment does not require a stage 2 assessment – formal request for such and screening matrix to be made available – legislatively required ([Draft0105](#))
4. Lack of formalised assessment of areas of ecological significance- inaccurate picture of the ecological sensitivities of the County and compromises the intent of the Appropriate Assessment does not account for cross county considerations ([Draft0105](#))
5. It is noted that the screening report templates provided for by the European Commission in their guidance document on Appropriate Assessment have not been used. ([Draft0164](#))
6. Serious reservations about the quality of assessment undertaken, and the gaps and deficiencies in the underlying information and studies including population considerations, flooding and biodiversity and climate change ([Draft0154](#))
7. Noted that the screening report templates provided for by EU guidance on Appropriate Assessment have not been used, and that these are useful to ensure all the necessary impacts are covered. ([Draft0283](#))
8. There is no reference in the Plan to the findings of the SEA or the AA screening process. Consideration should be given to including the following in the Plan: - A table to summarise the key findings of the SEA process - A summary description of the integration of the parallel processes of Plan preparation, Appropriate Assessment and Strategic Environmental Assessment. - A description of how the development of the preferred Plan Alternative has influenced the development of the Draft Plan itself. - Consideration should be given to the inclusion of a specific Policy/Objective in the Plan to ensure full compliance, with the requirements of Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment – The SEA Directive and the associated Planning and Development (Strategic Environmental Assessment) Regulations, 2004. - The Plan should promote the development and implementation of Procedures to ensure compliance with the requirements of the SEA Directive and related SEA Regulations for all Land Use Plans within the Plan area. - The Plan should include relevant Policies and Objectives are included, to address, where appropriate, the “Main Environmental Challenges” for Ireland as set out in Chapter 16 – “Main Environmental Challenges” of EPA Ireland’s Environment 2008 (EPA, October 2008). ([Draft0254](#))

2.5 5 Appendix 1 – Contents of Development Plans**2.6 6 Appendix 2 – Plans/Guidelines****2.7 7 Appendix 3 – Rural Design****2.8 8 Appendix 4 - SAAO****2.9 9 Appendix 5 – Extension Guidelines****2.10 10 Appendix 6 – Children's Play****2.11 11 Development Plan Maps****2.11.1 11.1 Lucan Luas - Indicated on Maps**

1. Requests that the Lucan Luas line (preferred route) be indicated on the Development Plan maps. ([Draft0289](#))

2.11.2 11.2 Map1

1. The Development Plan Map 1 should be amended to show the correct location of the Town Lands of Milltown, Kimactalway and Clutterland. ([Draft0202](#))

2.12 12 Introduction and Core Strategy**2.12.1 12.1 Core Strategy**

1. An Garda Siochana welcomes the Draft Plan and Looks forward to a good working relationship with South Dublin County Council ([Draft0040](#))
2. RPA broadly supportive of land use and transportation strategy in the Draft ([Draft0042](#))
3. Section 0.2.1 of the Core Strategy - sequential development. A mechanism for the implementation of sequential development is required within the main body of the document. ([Draft0098](#))
4. IÉ very much welcomes the positive support of SDCC in the Draft CDP for the various rail initiatives included under the T21 transport investment programme which will greatly benefit public transport accessibility within the County. ([Draft0147](#))
5. Throughout the CDP there are references to terms such as "strategy", "objective", "have regard to", etc. We believe that these terms are meaningless as used. When we suggest inclusions in the CDP throughout this submission, we wish to see them transposed as definite items e.g. Policies, or with definite timeframes or Critical Success Factors ()
6. If goals or Critical Success Factors are used, it will show the actual progress of the Council and the CDP ([Draft0137](#) [Draft0138](#))
7. If it becomes necessary or desirable to rezone land we believe that the case in favour of this should be so strong that a Material Variation to the plan will not be opposed. This (Material Variation) should be the only method used to zone land over the life of this plan. ([Draft0137](#) [Draft0138](#))
8. The Department is of the view that the draft Development Plan is well structured, clearly written, deals competently with a wide variety of planning issues and adequately incorporates national guidelines, the current Greater Dublin Area Regional Planning Guidelines (GDA RPGs) and the Retail Strategy for the GDA (2008-16). ([Draft0164](#))
9. The draft GDA RPGs 2010-16 will allocate the 2016 population target to the municipalities in the GDA and will also set out housing allocations on a municipal basis. These population and housing allocations will need to be incorporated into the Development Plan. ([Draft0164](#))

10. The Core Strategy in the draft Plan would not meet the specific requirements set out in the Planning and Development (Amendment) Bill 2009. The Bill indicates (section 5(a) (1B)) that all Development Plans must incorporate a Core Strategy which meets the requirements of the Bill 'as soon as practicable' or at least within one year of the relevant RPGs being adopted. ([Draft0164](#))
11. Depending on the timetable for the Development Plan and the date of publication of the draft GDA RPGs, the Council may wish to consider incorporating aspects from the draft RPGs (e.g. population and housing allocations) as material amendments to the draft DP. ([Draft0164](#))
12. The Development Plan timetable and the timing of progress of the Bill to enactment may also mean that the Council could give consideration through material amendments to aligning the Core Strategy in the draft DP with the Core Strategy requirements set out in what would be the new Act. ([Draft0164](#))
13. If it is not possible to make the adjustments, or if the adopted RPGs differ significantly from the draft RPGs, the requirement in the new Act would make it necessary to incorporate the relevant aspects of the adopted RPGs into the DP by way of a Plan variation. ([Draft0164](#))
14. Believe that there is already sufficient land zoned in the county for several years ([Draft0154](#))
15. Request that the Council immediately performs a flood risk assessment on all zoned lands in the county with the express aim to identify lands that are zoned on flood plains or are at risk of flooding and to de-zone them. This should be written into the CDP as a policy. ([Draft0154](#))
16. Regard the Plan as an excellent document and trust that it will give definite shape to the county in the future. ([Draft0157](#))
17. Concern regarding the standard of mapping and access to information at the Civic Offices Clondalkin. ([Draft0159](#))
18. Future growth projections must accurately and adequately inform the final draft development plan ([Draft0237](#))
19. The Council's policy for promoting the consolidation of existing built-up areas by facilitating quality infill development is welcomed by the IHBA and CIF ([Draft0237](#))
20. The Development Plan must guarantee the timely preparation, adoption and implementation of Local Area Plans (LAPs), Integrated Area Plans and Strategic Development Zones. ([Draft0237](#))
21. The Council must ensure that the plan is consistent with national policies of proper planning and sustainable development and reflective of national and regional guiding principles ([Draft0237](#))
22. The Council must commit to the servicing of zoned lands and the provision of key infrastructure projects to ensure that a shortfall of serviced, zoned, and ready to go lands does not occur during the lifetime of the new plan. Consideration should also be given to zoning lands which are serviced or could be readily serviced during the life of the new plan. ([Draft0237](#))
23. The adopted development plan must commit to the list of projects funded under the relevant Development Contribution Scheme, their programme status, amount of funding spent and target completion dates for each project should be published by the Council annually within three months of close of the financial year. It is suggested that the rate of development contributions in 2009 should be reduced by up to 40% ([Draft0237](#))
24. The CIF/IHBA supports the objective to assist in maintaining and guiding population growth in South County, in particular surrounding urban centres ([Draft0237](#))
25. The Development Plan should focus on improving the urban experience in key service and district centres across the County area ([Draft0237](#))
26. SWOT and PEST analyses should be carried out across Council departments prior to final adoption of the new development plan so that allocation of responsibilities for implementation of strategic policies is established from the outset. ([Draft0237](#))
27. Ensure privately funded development opportunities, which generate investment and employment on development lands are supported by the Council in the new development plan, particularly given the financial constraints facing many private investors now and into the medium term ([Draft0237](#))

28. Enhance communication links between key stakeholders within the County to stimulate the sharing of best practice and innovative approaches. ([Draft0237](#))
29. Ensure all local authority owned available lands can be brought through to the development process within the lifetime of the development plan. ([Draft0237](#))
30. In Section 0.1 Introduction include an overall Vision Statement recognising that social and economic well-being are intrinsically linked to the protection of the environment and committing to the future development South Dublin in accordance with the principles of sustainable development whereby natural resources and environmental conditions which are fundamental to the economic progress and social well being of society. ([Draft0255](#))
31. In Section 0.1 Introduction to include a new objective as follows: 'The Planning Authority is committed through the implementation of the policies and objectives of this Development plan and subsequent development plans to transform South Dublin into a low-carbon society and to increase local energy security and resilience. It is therefore an overarching objective of this Development Plan to achieve a reduction of greenhouse gases of at least 20% below 1990 levels and an increase in energy efficiency of at least 20% by 2020 in accordance with . The Planning Authority is committed to exceeding these targets in accordance with Ireland's agreed international commitments as set out in the EU "Climate Action and Renewable Energy Package" of January 2008'. ([Draft0255](#))
32. Recommend to the Planning Authority that it would be prudent to ensure that Chapter 0 of the Draft Development Plan, in so far as is possible, follows the methodology for the 'Core Strategy' in the Planning & Development (Amendment) Bill 2009 ([Draft0255](#))
33. The Draft Development Plan should amended to include a specific new section entitled 'Implementation & Monitoring' ([Draft0255](#))
34. The Draft Development Plan should be amended (Section 0.4) to include reference to a 'Sustainability Matrix' as an implementation tool in the assessment of all planning applications for development. A 'Sustainability Matrix' should be developed with reference to best practice national and international examples and included within the Development Plan ([Draft0255](#))
35. Overall, An Taisce welcomes the publication of the Draft Development Plan and the policies and objectives included therein. We consider that the Draft Development Plan represents a significant step in the creation of a sustainable society and an economy which operates within the carrying capacity of the earth's resources and ecosystem services and the capacity of the earth to absorb anthropogenic pollution. ([Draft0255](#))
36. 0.2.1 A Living Place The County's Land Use planning strategy is focused primarily on the energy benefits of increasing public transport, while paying little attention to the energy benefits of sustainable power and heat generation. Request that this policy should include provision for medium to long term residential development on sites with confirmed geothermal energy potential, such as at Newcastle. ([Draft0216](#))
37. Seeks the inclusion of an index and a bound set of A3 maps of the draft plan. ([Draft0232](#))
38. Section 0.2.5 – Core Strategy Request that the statement that the private car is the biggest contributor to green house gas emissions be changed as it is factually incorrect and that this section cannot conclude that the consolidation of the urban form will have an effect on commuting behaviour in light of travel pattern statistics from Adamstown. ([Draft0244](#))
39. Request that the manager de-zone 10% of all land zoned residential in the county and in council ownership. ([Draft0245](#))
40. Zonings such as those contained in Dublin City, Dun Laoghaire Rathdown and Meath County Development Plans should be incorporated within the Plan. ([Draft0250](#))
41. The National Sustainable Development Strategy should form the basis for the planned strategies within the plan. ([Draft0257](#))
42. Within the core strategy the names of the counties should be included when referencing RPGs. The county plans within the GDR, and possibly other counties, should be taken into account. ([Draft0018](#))
43. Section 0.4.6 should be amended to omit 'where it is appropriate'. ([Draft0018](#))

44. Request that the following documents be added: Draft Regional Planning Guidelines for GDA – 2010-2022 Meath County Development Plan 2007-2013 Draft Dun Laoghaire Rathdown County Development Plan 2010-2016 Draft Fingal County Development Plan 2011-2017 Draft Kildare County Development Plan 2011-2017 Draft Wicklow County Development Plan 2010-2016 ([Draft0018](#))
45. Regard the Plan as an excellent document and trust that it will give definite shape to the county in the future. ([Draft0196](#))
46. The development plan is well structured, clearly written, deals competently with a wide variety of planning issues, and adequately incorporates national guidelines, the current GDA RPGs and the retail strategy for the GDA. ([Draft0283](#))
47. 0.2 The Core Strategy in the draft plan would not meet the specific requirements set out in the Planning and Development (Amendments) Bill 2009. The council could give consideration through material amendments to aligning the Core Strategy in the draft plan with the Core Strategy requirements set out in the new Act, or if this is not possible by way of a variation of the plan. ([Draft0283](#))
48. The Plan should ensure the adequacy of the existing water supply/wastewater treatment facilities are assessed where zoning/rezoning of lands and the introduction of new development is being proposed. This should address both capacity and performance and the potential risk to human health, water quality and water quantity. ([Draft0254](#))
49. Urges the Council to be conscious of the need to sustain and develop local employment. ([Draft0281](#))
50. Consideration should be given to reviewing existing zoned lands to identify potentially inappropriate zoned lands, in the context of flood risk potential, and amending as appropriate. Particular attention should be paid to a "number of the locations identified as floodplains which have been zoned for development in the 2004-2010 CDP and are carried through into the current Draft CDP ([Draft0254](#))
51. Any future development, zoning / rezoning within the Plan area should ensure the findings of the Flood Risk Assessment Management Studies are taken into consideration prior to authorisation being granted. ([Draft0254](#))
52. The Plan should promote specific Policies/Objectives and associated provisions for the development and promotion of appropriate climate change adaptation and mitigation measures that can be implemented through relevant land use plans and/or specific plans e.g. Flood Risk Management Plans, Integrated Coastal Zone Management Plans etc. ([Draft0254](#))
53. The Plan should also promote the inclusion of specific Policies which promote the integration of the implications of Climate Change at a local level, in land use planning within the Plan area. In particular the Plan should refer to Ireland's National Climate Strategy 2007 – 2012. ([Draft0254](#))
54. The Plan should also address how climate change might impact on the implementation of land use plans in the Plan area, and in particular to the potential impact of climate change on " increased risk of flooding " and possible "increased occurrence of drought conditions" ([Draft0254](#))
55. Consideration should be given to the inclusion in the Plan, as appropriate, of a Policy/Objective in relation to the preparation and implementation of "An Energy Conservation Strategy" and associated awareness campaign within the Plan area. Specific timescales should be assigned to the preparation of such a strategy. ([Draft0254](#))

2.12.2 12.2 General Guidance (DM)

1. Ensure information on EIS submitted with planning application is complete and accurate- checklist of who checked each section signed off should be attached to all grants of permission/report ([Draft0105](#) [Draft0137](#) [Draft0138](#) [Draft0144](#))
2. Enforcement action against all unauthorised extractive activity must be a priority and the commitment to do so should be noted in Section 0.4.6. ([Draft0100](#))
3. Submit that a Policy of mandatory enforcement with adherence to the minimum time limits should be added to the CDP. ([Draft0137](#) [Draft0138](#))
4. Believe that charging the public to make observations or submissions is a barrier to public participation in the planning process. We submit that a policy should be

- included in the CDP to waive the charge (or charge a nominal fee of 1 Euro) for any submission on a planning application. It is within the Council's powers to waive fees ([Draft0137](#) [Draft0138](#))
5. Believe that charging the Public for access to information is a barrier to fairness. We submit that a policy should be included in the CDP to waive the charge (or charge a nominal fee of 1 Euro) for any FOI request. It is within the Council's powers to waive fees. ([Draft0137](#) [Draft0138](#))
 6. Suggest that the final bullet point concerning the carrying out of enforcement functions be amended from its somewhat weak wording: to • "Will carry out periodic site visits in order to ascertain compliance with an Enforcement Notice or with conditions attached to permissions and will take action expeditiously if non-compliance is found; • Will be pro-active with regard to enforcement and will not rely on complaints that may be received from third parties." ([Draft0157](#))
 7. Connectivity in terms of new development and development management must be continually monitored between South Dublin, Dublin City, Fingal, Dun Laoghaire-Rathdown, Wicklow and Kildare County Councils in particular ([Draft0237](#))
 8. Sustainable Construction overlooked- use of green building materials ([Draft0161](#))
 9. By 2013 building regs will require buildings in Ireland to be zero carbon from an operational standpoint ([Draft0161](#))
 10. CDP should take action to promote the use of construction materials with reduced embodied CO2 ([Draft0161](#))
 11. Propose to add a section to the CDP dealing with the product carbon footprint of construction materials in order to address green construction and climate change-stated policy to require the use of low carbon concrete, incorporating cements made from recycled industrial by-products- set at a minimum level of 30% of cement used in CDP projects to comprise a recycled industrial by-product such as GGBS of PFA ([Draft0161](#))
 12. Suggest that the final bullet point concerning the carrying out of enforcement functions be amended from its somewhat weak wording: to • "Will carry out periodic site visits in order to ascertain compliance with an Enforcement Notice or with conditions attached to permissions and will take action expeditiously if non-compliance is found; • Will be pro-active with regard to enforcement and will not rely on complaints that may be received from third parties." ([Draft0196](#))
 13. The Plan should highlight that under the EIA and Planning and Development Regulations certain projects that may arise during the implementation of the Plan may require an Environmental Impact Assessment. There are also requirements with regard to EIA for sub threshold development. It should be noted that the Projects would also be required to be screened with respect to the requirement for Habitats Directive Assessment/Appropriate Assessment as required by Article 6 of the Habitats Directive. ([Draft0254](#))

2.12.3 12.3 Policy Context

1. Request that the Brittas area rest in only one electoral area. ([Draft0071](#))
2. Terms such as strategy, objective, have regard to are meaningless as used- should be transposed as definite terms e.g. Polices, or with definite timeframes or Critical Success Factors ([Draft0105](#) [Draft0137](#) [Draft0138](#) [Draft0144](#))
3. Disappointed that so many of our suggestions in pre-draft submission were not even summarised for Council Members to consider ([Draft0258](#))

2.12.4 12.4 Proposed Amendments - Plan Format

1. State amendments to be made to the layout and format of the Plan document: • All paragraphs should be numbered and lettered as in the 2004 Plan. • An index should be provided. • The phrase 'have regard to' should be omitted from the Plan as its usages has been described as meaningless in the High Court. (McEvoy & Smith 2001/359 JRI). The phrase should be substituted by phrases such as: shall, as far as is practical, be consistent with. ([Draft0018](#))

2.12.5 12.5 Zoning Matrix

1. Add the following use classes to the open for consideration under zoning F; nursing home, residential institution, retirement home ([Draft0037](#))
2. Request introduction of 'car park' to Permitted in Principle' use class in the Zoning Matrix for 'GB' zoned lands as alternative to SLO request for IRFU lands at Newlands Cross. ([Draft0028](#))
3. Suggest if lands at Jacobs factory site are not rezoned from EP2 to EP1 alternatively include the uses: shop-discount (foodstore)-OPEN FOR CONSIDERATION, office 100-1,000sqm- PERMITTED IN PRINCIPLE and greater than 1,000sqm- PERMITTED IN PRINCIPLE, recreational building (commercial)- PERMITTED IN PRINCIPLE, health centre and education- PERMITTED IN PRINCIPLE ([Draft0059](#))
4. Propose that offices in excess of 1000m2 be "open for consideration" under EP2 ([Draft0129](#))
5. It is noted that residential development is listed as a "permitted" use on lands zoned for EP1 purposes where in accordance with "Local Area Plan Only" It should be noted that the Nass Road ADF does not constitute a Local Area Plan. It is requested that this notation be revised as follows "that development on these lands be in accordance with approved plans including Tallaght Town Centre LAP, Naas Road Development Framework and plans yet to be prepared for other areas zoned EP1" ([Draft0163](#))
6. Wish to include the following amendment; "that offices 100-1000sqm and offices over 1000sqm be permitted in principle at Citywest Business Campus on lands zoned EP2" ([Draft0200](#))
7. Strongly urge that most uses be included in the "open for consideration" category of EP2 ([Draft0205](#))
8. At the very least "Offices over 1000sqm" and "Shop Discount" should be moved from "not permitted" to "open for consideration" at this location (Fonthill Road). ([Draft0205](#))
9. Request that "Offices over 1000sqm" and "Shop Discount" should be moved from not permitted into open for consideration in the EP2 zoning. ([Draft0206](#))
10. Request that "Offices over 1000sq.m" and "Shop Discount Food Store" be classified as "open for consideration" ([Draft0207](#))
11. Request that the zoning matrix for Objective A be amended so that "Shop-Discount Food Store" be moved to "Open for Consideration" ([Draft0140](#))
12. It is noted that residential development is listed as a 'permitted' use on lands zoned for Enterprise Priority One purposes where in accordance with 'Local Areas Plan only' (as indicated by notation f under the zoning matrix of the Plan). However, it should be noted that the Naas Road Area Development Framework does not constitute a Local Area Plan. It is therefore requested that this notation within the adopted development plan is revised as follows: 'that development on these lands be in accordance with approved plans including Tallaght Town Centre Local Area Plan, Naas Road Development Framework and plans yet to be prepared for other areas zoned Enterprise Priority One'. ([Draft0191](#))
13. In the existing Development Plan, all of the land use zoning objectives are contained in Chapter 10, with associated use classes under each zoning. For ease of reference, it is useful to have all of the land use zonings and the zoning matrix in one chapter. ([Draft0230](#))
14. Site Airton Road, Tallaght Offices sized between 100m2-1000m2 and offices over 1000m2 should be included within the Matrix 'as permitted in principle' for land zoned EP2. ([Draft0162](#))
15. Site Airton Road, Tallaght Shop-discount food store should be included within the Matrix as 'open for consideration' for land zoned EP2. ([Draft0162](#))
16. Under Objective 'EP2' Offices over 1,000m2 and Shop-Discount Food Store are 'not permitted' uses. Request that these uses should at least be classified as 'open for consideration'. ([Draft0204](#))
17. The status of 'retirement home' be changed from 'not permitted' to 'open for consideration' in the Matrix associated with Greenbelt zoned land. ([Draft0221](#))
18. Amend proposed EP2 zoning to permit in principle Office uses 100 sq. m - 1,000 sq. m. and Offices over 1,000 sq. m. or alternatively designate as "Open For Consideration" ([Draft0168](#))

19. It is requested that the following amendments be made to the draft zoning matrix:-
 - To permit in principle all classes of office development on EP 2 lands;
 - To include an additional office use, Offices (Class 3), to be permitted in principle on EP 1 and EP 2 lands;
 - To permit in principle residential development on EP 2 lands, subject to a Local Area Plan. ([Draft0169](#))
20. Request that offices in excess of 1,000m² be 'open for consideration' under EP2. ([Draft0244](#))
21. Request that the 1,000m² cap on office developments within EP2 zoned lands is removed and that each application is assessed on its merits. ([Draft0250](#))
22. Request that the Matrix be amended to include education as 'permitted in principle' in the 'G' zone. ([Draft0262](#))
23. Request that Offices over 1,000m² and Shop Major Sales Outlet are made 'Open for Consideration' for LC zoning. ([Draft0118](#))

2.13 13 Land Use Zoning

2.13.1 13.1 Map 1

1. Concerned that the zoning of land, which is in their ownership, and which is contained within the Clonburris LAP has been airbrushed from the Plan. ([Draft0044](#))
2. Request that St Helen's House and grounds on Tandy's Lane be removed from the Adamstown SDZ zoning as its inclusion appears to have been made in error. ([Draft0064](#))
3. There is no requirement to zone additional lands for employment use having regard to the significant amount of employment land already zoned from the 2004 Development Plan and not yet developed. ([Draft0121](#))
4. Note a number of issues pertaining to the particular lands proposed to be zoned, issues include accessibility, Urban sprawl, impact on existing zoned land. ([Draft0121](#))
5. There is an adequate bank of zoned land and therefore no land should be rezoned for housing in the Lucan area. ([Draft0117](#))
6. In the area known as the Rathfield, near Primrose Lane there is sufficient lands zoned for sheltered housing. We submit that no further land in that area should be zoned. ([Draft0137](#) [Draft0138](#))
7. Objects to the additional zoning of Enterprise and Employment land at Milltown, Kimactalway and Clutterland. ([Draft0202](#))
8. Requests that all lands west of the R120 be rezoned from EP2 and EP3 to B until the next development plan review. This is particularly important given the long-term approach to the roads being taken in this development plan. ([Draft0131](#))

2.13.2 13.2 Map 1 and 3

1. Objection to the rezoning of agricultural lands to industrial at Peamount Road – Peamount Hospital ([Draft0107](#))

2.13.3 13.3 Map 2

1. Object to rezoning of lands at Coldcut Road Clondalkin Dublin City Services Sports and Social Club (ref PDS0136) ([Draft0024](#) [Draft0039](#))
2. Regarding proposed rezoning of land at Coldcut Road - believes that there is sufficient lands provided for development in the area in the Liffey Valley LAP ([Draft0024](#))
3. With regards to the proposal for the rezoning of lands at the Coldcut Road - If development is allowed, the council should address architectural design, traffic management, overlooking, overshadowing and construction management. ([Draft0024](#))
4. Draft pays insufficient regard to potential of GB zoned lands at Newlands Cross to contribute to sustainable development by retaining the GB Zoning. ([Draft0028](#))

5. Request to reconsider effective freezing of IRFU lands at Newlands cross, in light of Metro West- proposed stop located beside lands which have development potential within life of the Plan. ([Draft0028](#))
6. Oppose rezoning of Coldcut Road site. ([Draft0284](#))

2.13.4 13.4 Map 3

1. Objects to the rezoning of land to Zoning Objective 'EP3', in their ownership, located to the south of the main road from Rathcoole to Newcastle and adjacent to Aerodrome Business Park roundabout entrance. ([Draft0043](#))
2. Request that the rezoning of agricultural lands ("B") to industrial ("EP3") between College Lands and Tay Lane, Rathcoole, on the western side of the N7 be reversed because: of the lack of public transport; its use of irreplaceable agricultural resources; development should be provided on brownfield sites; its impact on habitats and riparian zones; possible flooding; the impact that run-off water may have on brown trout and the River Griffeen; industrial development is incongruous with the rural landscape; its serious impact on the villages of Rathcoole, Newcastle and Lucan and it would be contrary to the Environmental Report. ([Draft0063](#))
3. Objection to the rezoning of agricultural lands ("B") to industrial ("EP3") between College Lands and Tay Lane, Rathcoole ([Draft0107](#))
4. Welcome the removal of the Security Zone restriction from the zoned, serviced and accessible lands located directly to the Northeast of the Baldonnell Business Park. ([Draft0129](#))
5. The change to the security zone has resulted in a substantial reduction in the extent of the area restricted in the Draft Plan. An area of c.77ha has been de-restricted and removed from the Security Zone. ([Draft0129](#))
6. Additional Zoned Land is not required as there is an oversupply of land within Ballybane, Grange Castle, Greenogue and Baldonnell area that was zoned in the 2004 plan. ([Draft0159](#))
7. Request the Council to rescind the proposed rezoning of the areas mentioned as Milltown/Kilmactalway and Clutterland. ([Draft0159](#))
8. Supports confirmation that 'Airscape lands' (27.5 ha) at Fortunestown remain zoned A1. ([Draft0133](#))
9. Support for the rezoning of lands at Tay Lane for the purposes of Enterprise and Employment and requests that this zoning be retained. ([Draft0134](#))
10. Consider the rezoning of agricultural lands to industrial between Collegeland and Tay Lane totally unacceptable. ([Draft0279](#))
11. Request that the c124ha of EP3 zoned lands to the west of Profile Park at Kilmactawlay/Clutterland, lands to south of Greenogue and 55 ha of land at Baldonnell Business Park are omitted from the Development Plan. ([Draft0260](#))
12. Objection to the rezoning of agricultural lands to industrial between Collegeland and Tay Lane. ([Draft0240](#))
13. Questions what environmental assessment was carried out with regard to ground water, surface water and flood prevention in relation to the rezoning of land at Collegeland. ([Draft0240](#))
14. Support for the de-restriction of proposed industrially zoned, serviced and accessible land around Casement Aerodrome. ([Draft0244](#))
15. Objects to the zoning of large swathes of additional employment land at Newcastle and Rathcoole at this time given the significant amount of undeveloped employment land remaining from the previous development plan. Large scale zoning will undermine development of existing employment lands in the short term and represents poor planning overall which will lead to continued urban sprawl, 'leapfrogging' of existing zoned lands and poor integration of land use and transport. ([Draft0251](#))
16. Regards the rezoning of the Profile Park lands, from 'E' to 'EP2', with a restriction on offices over 1,000m² as counterproductive and will conflict with the agreed Masterplan for these lands which provides for commercial offices and corporate headquarters within a mixed use business park setting. ([Draft0251](#))
17. Objection to the rezoning of lands at Kilmactawlay/Clutterland as it is considered inappropriate for development of road dependent industrial uses given their distance

from and lack of direct accessibility to the national road network. If the land is to be rezoned request that a) a phasing restriction on the development of these lands be applied to ensure that the current zoned lands in the industrial arc including those at Profile Park are given priority and b) the development of any additional lands should be subject to a comprehensive Masterplan(s) to detail the extent of roads and services required and to ensure that these are provided upfront. ([Draft0251](#))

2.13.5 13.5 Map 4

1. The Council should ensure that under no circumstances is the Belgard Road property rezoned to a use that will allow profit taking at the expense of Tallaght jobs. ([Draft0102](#))
2. Rebalance rezoning be done and that all efforts are made to ensure that the Jacobs site does not become a residential zone and in return to community purposes. ([Draft0102](#))
3. Requests that SDCC rezone all undeveloped land on the Main Road from Tallaght Village to the site of Bryan's Ryan: to provide the lands with lower densities; restrict heights to 2 storey; exclude apartment blocks and at a minimum exclude 1 bed apartments; and reinstate the Pocket Park at the site of Lidl. ([Draft0116](#))
4. The Esso site in Tallaght should be rezoned or be the subject of a land swap to provide for community facilities. (No map included) ([Draft0116](#))
5. The Fruitfield site located along the Blessington Road should be de-zoned or be used for educational, hospital or community purposes. (No map included) ([Draft0116](#))
6. Concerned that the rezoning of the site at Greenhills Road, Tallaght, to zoning Objective 'EP2' is restrictive and would be contrary to the Tallaght Area Plan. Request that it be zoned 'EP1'. ([Draft0204](#))
7. Concerned regarding the proposed rezoning of a chunk of land adjacent to Corkagh Park, Clondalkin ([Draft0287](#))
8. Revise zoning of lands at Tallaght ([Draft0181](#) [Draft0182](#) [Draft0183](#) [Draft0184](#) [Draft0185](#) [Draft0186](#) [Draft0188](#) [Draft0189](#))
9. There should be no change in zoning as was previously attempted in variation requests to allow apartment developments on the lands owned by The Old Mill public house. The development types and scale in this natural amenity should remain high amenity and seek to retain and maximise its potential to develop environmental & recreational activities. ([Draft0139](#))

2.13.6 13.6 Map 4 and 1

1. Suggest there is no need to rezone more industrial land at this time, Proposed areas, including those at Grange Castle and Kilinarden, should not be rezoned. ([Draft0158](#))

2.13.7 13.7 Map 4 and 7

1. In favour of retaining the lands located to the south of the M50 motorway for agricultural purposes ([Draft0013](#))

2.13.8 13.8 Map 6

1. Request the re-zoning of land in the hinterland of Brittas to 'G' zoning (3 Km Radius). ([Draft0071](#))

2.13.9 13.9 Peri Urban Area

1. Suggest council examines the possibility of realising the potential of Dublin's peri-urban regions by researching Peri Urbans Regions Platform Europe (PURPLE) regarding food security and sustainably managed open space ([Draft0131](#))

2.14 14 Local Zoning Objectives

2.14.1 14.1 Cooldrinagh – Redevelopment of Former Co-op site

1. Support for LZO 1 – Cooldrinagh – Redevelopment of Former Co-Op Site. ([Draft0063](#))
2. The area west of the existing warehouses at the Cooldrinagh lands be provided for a Park and Ride facility and Petrol Filling Station ([Draft0145](#))
3. Suggest LZO 1. Cooldrinagh be deleted. ([Draft0158](#))

2.14.2 14.2 Cuckoo's Nest/Tymon Park – Residential Development

1. Residential element of LZO 7 be deleted and the land acquired and added to Tymon Park. ([Draft0158](#))

2.14.3 14.3 Existing LZO 12 - Spawell - Reinstatement

1. Support for the reinstatement of existing Local Zoning Objective 12 – Spawell, Templeogue – Mixed-Use Redevelopment in the next County Development Plan, subject to various changes proposed: Facilitate redevelopment of the Spawell Sports and Leisure Centre, Wellington Lane, Templeogue, for commercial, leisure, health, well-being, education and recreational purposes. An acceptable development proposal would include a sports centre incorporating indoor and outdoor sports facilities, and complementary mixed uses including an ancillary hotel of 200 bedrooms with conference facilities and integral staff accommodation, a nursing home, primary healthcare and step-down healthcare facilities or other similar scheme. Any development on the lands to be carefully designed to a scale and height appropriate to its proximity to the Green Belt. ([Draft0125](#))

2.14.4 14.4 LZO 2 - Primrose Hill - Sheltered House

1. Request that land in their ownership be included under Local Objective No. 2 (LZO2) “to facilitate the provision of sheltered housing” and would like the LZO to include the following sentence: the provision of a nursing home in conjunction with Sheltered Housing. ([Draft0099](#) [Draft0210](#))

2.14.5 14.5 LZO 3 - Rail corridor framework (Support)

1. Support for LZO 3 – Rail corridor - Framework ([Draft0197](#))

2.14.6 14.6 Other Proposals

1. Request that LZO 8 from existing plan be reinstated within draft plan and read as follows “Facilitate the development of the site on the north side of the Naas Road, east of St.Brigid’s cottages for appropriate high quality, mixed use development. The lands have potential to accommodate high density development in accordance with their strategic location adjacent to existing and planned public transport infrastructure” ([Draft0163](#))
2. Propose that the draft plan be amended to include the following Local Zoning Objective 6. Hazelhatch – Residential Marina Village Facilitate the development of a Residential Marina Village at Hazelhatch subject to the preparation of the framework plan for the Kildare rail corridor. ([Draft0236](#))

2.14.7 14.7 Proposed LZO - Citywest

1. Proposed LZO on lands currently occupied by the Citywest Lakes golf course (north end) to read: To facilitate development of Third Level Education in accordance with

policy SCR14, to support the development and ongoing provision of Third Level Education and development of competences in innovation, product design and R&D. ([Draft0262](#))

2.14.8 14.8 Proposed LZO- Citywest

1. LZO to facilitate development of Major Leisure Facilities under Policy EE27 including:
 - • An integrated dedicated holiday park for family visitors; • Health tourism facilities; • A large-scale integrated holiday complex featuring high quality accommodation conference and mix of activity measures; • Events arena; • 'soft Adventure' facilities.([Draft0262](#))

2.14.9 14.9 Rail corridor – Framework

1. Propose that LZO 3 be amended as follows “Facilitate the preparation of a detailed framework plan for the identification of future development along the rail corridor from the city boundary to the Kildare county boundary within a 1km catchment of the line. This framework plan will consider future economic and enterprise, commercial, residential and amenity development.” ([Draft0236](#))
2. Propose lands at Hazelhatch as a location for a new strategic settlement and therefore Local Objective 3 should specify Hazelhatch as a strategic site that will form part of the framework plan that will identify future development along the rail corridor. Request that Local Objective 3 be amended as follows: “Facilitate the preparation of a detailed framework plan for the identification of future development along the rail corridor from the city boundary to the Kildare county boundary within a 1 km catchment of the line. This framework plan will consider future economic and enterprise, commercial, residential and amenity development.” ([Draft0238](#))

2.14.10 14.10 Reinstate LZO 8 of 2004 plan

1. It is requested that the existing Local Zoning Objective 8 of the current 2004-2010 Development Plan is reinstated within the 2010-2016 Plan. However, it is requested that the 2010-2016 Development Plan should acknowledge that the proposed Naas Road Gateway Urban Design Masterplan currently being undertaken by the Council fulfils the requirements of Local Zoning Objective 8, and that no further Masterplan be required in respect of these lands. It is therefore submitted that the wording of Local Objective 8 within the 2010-2016 Development Plan should read as follows: 'Facilitate the development of the site on the north side of the Naas Road, east of St. Brigid's Cottages for appropriate high quality, mixed-use development. The lands have potential to accommodate high density development in accordance with their strategic location adjacent to existing and planned public transport infrastructure'. ([Draft0191](#))

2.14.11 14.11 Update and replace LZO14

1. Request zoning of lands south of the terminus at Fortunestown Lane and land currently occupied by Citywest Golf Course to EP1 for a tourist resort and third level education. ([Draft0262](#))

2.15 15 Schedule 1 – Record of Monuments and Places

2.15.1 15.1 DU021 021 - Removal

1. Request for the removal of entry DU021 021 – Ringfort(Rath/Cashel) - from the Record of Monuments and Places. ([Draft0127](#))

2.16 16 Schedule 2 – Record of Protected Structures

2.16.1 16.1 Map 3

1. Requests that the Protected Structure status of the Poitin Stil be revisited as it is a relatively new structure rebuilt in recent years and has no specific interest. ([Draft0015](#))

2.16.2 16.2 Map 5A

1. Request that No. 245 Templeogue Road, an Art Deco style dwelling, not be included on the list of Protected Structures. ([Draft0046](#))

2.16.3 16.3 Protected Structure - Ref 157 - Amendment

1. Protected Structure – Map Ref. 157 – Ecclesiastical Enclosure and Holy Well Is it imperative to include the laneway running alongside the enclosure? ([Draft0107](#))

2.16.4 16.4 Removal from RPS

1. Propose the removal of the mews building, associated with Rockbrook House, from the Record of Protected Structures. ([Draft0132](#) [Draft0231](#))

2.17 17 Schedule 3 – Definitions of Use Classes

2.17.1 17.1 Clarification - Local/Neighbourhood Centres

1. Request that Shop-Neighbourhood be provided with a definition, including scale, within Definitions and Use Classes. Request clarification regarding Local Centres and Neighbourhood Centres as a 'Shop Major Sales Outlet/Supermarket' is not permitted under this zoning. ([Draft0250](#))

2.18 18 Schedule 4 – Casement Aerodrome Baldonnell

2.18.1 18.1 Amendment Sought

1. Development around Casement Aerodrome should not be based on 'the slight risk to persons on the ground'. ([Draft0107](#))

2.18.2 18.2 Security Zone Restriction - Removal

1. Request for the removal of the Security Zone Restriction designation from the Draft Plan as it applies to the lands at Baldonnell and the implementation of proper security and safety measures in accordance with national and international standards and best practice. ([Draft0127](#))
2. Request the removal of the Security Zone from around Casement Aerodrome and request the Council review the Mott MacDonald report. ([Draft0244](#))

2.18.3 18.3 Study Requested

1. As a matter of urgency, request that the Council seek the publication of the Mott MacDonald Review of Safety Policy at Casement Aerodrome and publish full details of the basis on which the current Development Plan Security Zone has been amended in the Draft Development Plan. ([Draft0129](#))
2. Request for an up to date study in relation to the restriction area at Baldonnell Airport similar to that carried out by ERM for Dublin, Cork and Shannon airports. ([Draft0228](#))

3. Request that a study be carried out, similar to that carried out for Dublin, Cork and Shannon airports, in relation to the restriction area at Casement aerodrome. ([Draft0190](#))

2.19 19 Schedule 5 – Weston Aerodrome Lucan

2.20 20 Schedule 6 – Housing Strategy 2010 – 2016

2.21 21 Schedule 7 – Landscape Character Area Description

2.22 22 Specific Local Objectives

2.22.1 22.1 12th Lock Canal Bridge

1. The SLO to retain and protect the character of the 12th Lock Canal Bridge should include the Lock which is a listed structure. The industrial zoning would create noise pollution along the existing rural canal corridor contrary Objectives Nos. 1 and 2 of the Grand Canal Study. ([Draft0131](#))

2.22.2 22.2 Balrothery Estate – Residential Development

1. Objects to further apartment development taking place in Balrothery. ([Draft0020](#) [Draft0072](#))
2. SLO 52- Request reinstatement of wording from existing SLO 75 ([Draft0021](#) [Draft0019](#) [Draft0073](#) [Draft0080](#) [Draft0081](#) [Draft0082](#) [Draft0074](#) [Draft0075](#) [Draft0076](#) [Draft0083](#) [Draft0085](#) [Draft0032](#) [Draft0041](#) [Draft0069](#) [Draft0086](#) [Draft0087](#) [Draft0090](#) [Draft0091](#) [Draft0038](#))
3. SLO 52- proposed new wording. "Ensure that the density of any future development on the private lands at the South west side of Balrothery Estate (two cottages) shall be limited to the density already in Balrothery and shall have regard to the protection of residential amenity for the adjoining dwellings" ([Draft0023](#))
4. No objection to any development on lands in Balrothery Estate that is in line with existing housing in the estate ([Draft0084](#))
5. Object to proposed development at cottages at Balrothery ([Draft0079](#) [Draft0089](#))

2.22.3 22.3 Barney's Lane – Pedestrian Bridge

1. Welcome the inclusion of Local Objective No.48: to provide a pedestrian footbridge/ling across the N7, from Barneys Lane area to the north to the Garters Lane area to the south, ([Draft0129](#))

2.22.4 22.4 Corkagh Park – Sporting Centre

1. Specific Local Objective 38-Corgagh Park. Any work in this area, particularly provision of lakes/water features of development likely to cause pooling of water, may pose an attractant for waterfowl posing a threat to air safety at Casement. Any developments in this area should be subject to consultation with DoD. The Department would not be in favour of the provision of a fishing lake in such proximity to an approach path ([Draft0218](#))

2.22.5 22.5 Edmondstown – Residential Development

1. Request for review of densities on SLO 71 ([Draft0011](#))

2.22.6 22.6 Enterprise Lands – Framework Plan

1. If the Planning Authority considers that an EP3 zoning designation should be provided for in the vicinity of Profile Park, suggest the following addition to SLO 36 “ Any planning application on these EP3 zoned lands will be considered premature pending the preparation and agreement of the Council of the Action Area Plan. ([Draft0260](#))

2.22.7 22.7 Enterprise lands – Kilinarden

1. Suggest delete SLO 63 as this area should not be rezoned industrial as the road infrastructure in this location is not suited to increased industrial traffic ([Draft0158](#))

2.22.8 22.8 Grange Castle Golf Course – Adjoining lands

1. Local Zoning Objective No 4- Grange Castle Golf Course The Department of Defence shall be consulted in relation to any proposed developments ([Draft0218](#))

2.22.9 22.9 Griffeen Valley Park – Biodiversity

1. Specific Local Objective No 23- Griffeen Valley Park- Biodiversity. Any work in this area, particularly provision of lakes/water features, may pose an attractant for waterfowl posing a threat to air safety at Casement. Any developments in this area should be subject to consultation with Department of Defence ([Draft0218](#))

2.22.10 22.10 Liffey Valley - Amenity

1. Request to remove reference to car parks from SLO 1 Liffey valley Amenity ([Draft0105](#) [Draft0137](#) [Draft0138](#) [Draft0144](#))

2.22.11 22.11 LZO 1 - Amendment

1. Support for a public park at Cooldrinagh, which would incorporate the Tara Co-op Lands. ([Draft0117](#))

2.22.12 22.12 Map 1

1. Request that an SLO for the Profile Park lands allowing for the development of offices over 1,000sq.m in accordance with the agreed Masterplan for the lands ([Draft0121](#))
2. Request new SLO on profile park lands at Kilbride stating that any future development of the lands for employment uses shall be determined following archaeological and conservation assessment having regard to the protected structure and recorded monument on site. ([Draft0119](#) [Draft0247](#))
3. LZO/SLO: - To facilitate coordinated development of infrastructure appropriate to an executive airport at Weston Executive Airport in liaison with Kildare County Council as an asset serving both counties within the Dublin Metropolitan Area . ([Draft0241](#))

2.22.13 22.13 Map 2

1. A specific objective to facilitate Park and Ride on the lands ([Draft0028](#) [Draft0120](#))
2. Request that a Specific Objective be attached to the site which requires the preparation of an Area Action Plan to address access, connectivity to public transport and the longer term integration with adjoining lands in Clondalkin Industrial Estate. ([Draft0165](#))
3. It is suggested that a local objective be applied to the subject site and will be dependent on the delivery of the Luas Line F and would incorporate community facilities. ([Draft0213](#))

4. Requests Specific Local Objective on lands at Monastery Road, Clondalkin similar to the current SLO 45 ([Draft0173](#))

2.22.14 22.14 Map 3

1. Request a policy statement and associated Local Zoning Objective/Specific Local Objective, be attached relating to a higher education campus south of Fortunestown Lane Saggart stating "to facilitate development of Third Level Education in accordance with policy SCR14. to support the development and ongoing provision of Third Level Education and development of competences in innovation, product design and R & D" ([Draft0224](#))
2. Suggested wording for a SLO: It is an objective of the Council to prioritise the development of indigenous renewable energy resources within the County. In this context it is an objective of the County Development Plan to support the continued investigation of the potential and scale of the deep geothermal heat resources within the County, including confirmed available resources at Newcastle. It is also a specific local objective of the Council to support a pilot project to demonstrate the exploitation and use of the renewable energy resource in a new energy self-sufficient residential community adjacent to Newcastle. This will facilitate the development of future growth areas in the county in a sustainable manner. The specific local objective boundaries of the pilot project lands are outlined on Map 3 of the Development Plan at Newcastle. The development of the renewable energy pilot project lands shall be subject to the following provision: No development whatsoever can take place within the specific local objective boundaries until the potential and capacity of the geothermal energy resource has been proven and demonstrated to the satisfaction of the Council. ([Draft0216](#))

2.22.15 22.15 Map 4

1. request that a Specific Local Objective be added to the Heiton zoned lands on the N7 and adjoining lands around the Red Cow LUAS which would seek "to promote mixed use commercial development (including offices greater than 1,000 sq.m) subject to a master-plan being prepared for the site and to include due regard for access, egress and capacity." ([Draft0103](#))
2. Request that an SLO be designated on the lands " to provide that 20 residential units shall be constructed on the site in conjunction with the ceding into public ownership of that part of the lands required to implement the Council's objective to develop the Dodder Valley Linear Park and that the ceding of the portion of the lands for a walkway along the Dodder be agreed previously in consultation Parks and Planning Departments". ([Draft0124](#))
3. Request that an SLO be designated on the lands " to provide that 20 residential units shall be constructed on the site in conjunction with the ceding into public ownership of that part of the lands required to implement the Council's objective to develop the Dodder Valley Linear Park and that the ceding of the portion of the lands for a walkway along the Dodder be agreed previously in consultation Parks and Planning Departments". ([Draft0124](#))
4. Request the reinstatement of SLO 119 from current plan which should read "Facilitate the sustainable development and expansion of educational/community facilities on the lands of Rockbrook Park School" ([Draft0132](#) [Draft0231](#))
5. Propose new SLO "The old stone wall boundary of the Clondalkin Rugby Club grounds facing the Old Naas Road should be retained but may need to be rebuilt further back from its present location to facilitate the creation of a public footpath along that part of the east side of the Old Naas Road." ([Draft0106](#))
6. Propose new SLO "The mature trees in the grounds of both the Roadstone Social Club and the Clondalkin Rugby Club should be retained as they provide both a valuable setting for the amenities of both clubs as well as a very important visual and natural amenity for the residents of Kingswood Village" ([Draft0106](#))
7. Propose new SLO "The mature trees in the grounds of both the Roadstone Social Club and the Clondalkin Rugby Club should be retained as they provide both a

- valuable setting for the amenities of both clubs as well as a very important visual and natural amenity for the residents of Kingswood Village” ()
8. Propose new SLO “There shall be a unified approach to directional signage for Kingswood Village along the roads leading into Kingswood Village. All such signs should include the term Kingswood Village rather than Kingswood so as to make it absolutely clear to visitors that Kingswood Village is a different place with its own locational identity to Kingswood Heights ([Draft0106](#))
 9. Propose new SLO “A landscaping scheme shall be provided for Kingswood Village to complement the proposed traffic calming scheme for Kingswood Village in order to improve its visual identity and sense of place. There appears to be a particular opportunity in this context to landscape the area on the west side of the Old Naas Road as one approaches Kingswood Village from the Outer Ring Road. This landscaping scheme should also seek to improve the landscaping of the east side of the N7 behind the village” ([Draft0106](#))
 10. Propose new SLO “South Dublin County Council shall limit any further attempt to develop the Belgard Quarry to the spatial extent and activities permitted for the Belgard Quarry under SDQU05A/2 whose quarry registration permission became effective on 18 April 2007 within the lifetime of this County Development Plan in the interests of the proper planning and sustainable development of this very large quarry area which is close to Kingswood Village. ([Draft0106](#))
 11. Propose new SLO “Because Kingswood Village currently lacks a retail convenience grocery store South Dublin County Council shall use its best endeavours to encourage the developer of the Silken Park estate to construct immediately the proposed retail units there provided for under existing planning permissions SD05A/0438 and SD06A/0221” ([Draft0106](#))
 12. Propose new SLO “It shall be an objective of this County Development Plan to preserve the mature trees within the grounds of Kingswood House and the adjoining Maldron Hotel in order to provide an appropriate setting for Kingswood House as a Protected Structure and in the interest of the visual amenities of the area.” ([Draft0106](#))
 13. Propose new SLO “The County Council shall initiate discussions with Citywest Ltd., the owners of Citywest Business Park with the objective of agreeing the creation of a link in the form of pedestrian paths between the Citywest Business Park and Kingswood Village in the interests of pedestrian permeability and recreational amenity” ([Draft0106](#))
 14. Propose new SLO “It shall be an objective for the County Council to prepare a report on the amenity potential for Kingswood Village of the stream running from Citywest Business Park along the southern boundary of Silken Park in Kingswood Village, which then crosses under the Old Naas Road before disappearing under the N7.” ([Draft0106](#))
 15. Propose new SLO “The section of the Old Naas Road which is now closed as a public road between Kingswood House(Protected Structure) and Wilson’s Car Auctions shall be retained in County Council ownership with the aim of the County Council providing controlled off street car parking there to service Kingswood Village generally and specifically to facilitate existing uses in the Kingswood area such as matches organised by Clondalkin Rugby Club and Wilson’s Car Auctions so as to discourage unauthorised car parking along the Old Naas Road in the interests of pedestrian and vehicular traffic safety and circulation by the residents of Kingswood Village ([Draft0106](#))
 16. Request for the inclusion of a SLO within the County Development Plan to read as follows: Lands at Bohernabreena Road, Old Bawn (2.6ha) To consider proposals for a Waste Transfer/Recycling facility subject to an agreed Environmental Management Plan and the implementation of Policy LHA 28 within the extent of the lands, providing for a continuous strip of public open space of a minimum depth of 20m along the full river frontage of the site. This area is to be ceded to/taken in charge by Planning Authority. ([Draft0151](#))
 17. Request for the inclusion of a SLO within the County Development Plan to read as follows: Lands at Bohernabreena Road, Old Bawn (2.6ha) To consider proposals for medium density residential development, subject to implementation of Policy LHA28 within the extent of the lands, providing for a continuous strip of public open space of

- a minimum depth of 20m along the full river frontage of the site. This area is to be ceded to/taken in charge by Planning Authority. ([Draft0152](#))
18. Request for the inclusion of a SLO within the County Development Plan to read as follows: Lands at Bohernabreena Road, Old Bawn (2.6ha) To consider proposals for nursing home development, subject to an agreed Environmental Management Plan and the implementation of Policy LHA28 within the extent of the lands, providing for a continuous strip of public open space of a minimum depth of 20m along the full river frontage of the site. This area is to be ceded to/taken in charge by Planning Authority. ([Draft0153](#))
 19. Specific Local Objective be designated on their site located adjacent to the M50 / N7 junction to facilitate re-development of the site for a landmark office building ([Draft0171](#))

2.22.16 22.16 Map 5A

1. Request SLO at Bloomfield Care Centre, Stocking Lane "To protect and provide for medical and care related uses associated with the operation of Bloomfield Care Centre, Stocking Lane." ([Draft0051](#))
2. Request for the imposition of a SLO on lands at Whitechurch, Rathfarnham, "to support the provision of a 'one-stop' primary care medical centre, nursing home and group GP practices/consultancies in purpose built premises in accordance with HSE requirements." ([Draft0227](#))

2.22.17 22.17 Map 6

1. New SLO that reserves the lands for the relocation Objective EP3 compatible uses from Objective EP2 or EP1 zoned areas from the Naas Road Framework Plan Area, and the preparation of a Masterplan for the lands. ([Draft0166](#))

2.22.18 22.18 Map 7

1. Request SLO "That the Planning Authority recognise the interest of persons local to or linked to rural areas, who are not engaged in significant agricultural or rural resource related occupation, to live in rural areas and that a planning and housing study be carried out to examine how the needs of local people might be accommodated in the Bohernabreena / Glenasmole / Ballinascorney Area" ([Draft0243](#))

2.22.19 22.19 New SLOs at Bolton Hall, River Glin, Owendoher River

1. With recent events believe that a Specific Local Objective should be attached to the following 1. Bolton Hall 2. River Glin 3. Owendoher River ([Draft0258](#))

2.22.20 22.20 New SLOs Ecological Corridors

1. Consideration should be given to the inclusion of Specific Local Objectives to ensure protection and appropriate assessment of ecological corridors within the Plan area. ([Draft0254](#))

2.22.21 22.21 Oldcourt, Kiltipper - Bridge

1. Proposed Oldcourt Kiltipper bridge is not acceptable if it is a public vehicular bridge as it would open up the Dodder Valley in this area to highly undesirable development ([Draft0158](#))

2.22.22 22.22 Other proposals

1. It is requested that a Specific Local Objective be applied to the lands, "to provide for Primary Education Facilities", at Swiftbrook Saggart ([Draft0093](#))

2.22.23 22.23 Palmerstown – Waterstown Park

1. Suggest amend SLO 8 to read To continue to investigate and acquire land adjoining Waterstown Park at Palmerstown (Coates Land) to be incorporated into the Liffey Valley Regional Park. In doing so both the former Waterstown House, its outbuildings and 'White's Bridge'/iron bridge should be fully restored as features associated with the Park. ([Draft0158](#))

2.22.24 22.24 Proposed SLO - Allotments Lexington

1. Request a policy to install allotments at the Lexington site. ([Draft0245](#))

2.22.25 22.25 Proposed SLO - Corkagh Fisheries

1. Request that it is an objective of the Development Plan to fully promote and develop the Corkagh Fisheries as a year long community facility and to include as much local employment and involvement as possible ([Draft0245](#))

2.22.26 22.26 Proposed SLO - GAA Grounds Rathcoole

1. Request for the development of GAA grounds at Rathcoole. ([Draft0288](#))

2.22.27 22.27 Proposed SLO - Profile Park

1. Request that the Plan include a 'Specific Local objective' for the Profile Park lands allowing for the development of offices over 1,000m² in accordance with the agreed Masterplan for the lands. ([Draft0251](#))

2.22.28 22.28 Proposed SLO - Saggart Retirement Village

1. Request that an SLO be put on lands located within the Saggart Greenbelt to facilitate the development of a retirement village. ([Draft0221](#))

2.22.29 22.29 Proposed SLO- Aylesbury

1. There needs to be a SLO to develop Aylesbury open space as a fully functioning amenity for the safe and full enjoyment of the entire community. It currently provides sporting facilities, with minimal other amenities for the wider community. It cannot be accessed fully by wheelchairs or pedestrians with prams. It does not have complete walkways, nor it is fully secured on all sides by appropriate boundaries. It is vulnerable to illegal access by scramblers & cars. ([Draft0139](#))

2.22.30 22.30 SLO - Grange Castle - (Extension of)

1. SLO 30 – Grange Castle Business Park (Notation) Concerned at the possible loss of clean air, which is required to run the Microsoft business at the Grange Castle Business Park, due to the rezoning of land in the Clutterland area of the County. Requests that SLO 30 – Grange Castle Business Park notation be also noted on the newly proposed industrial land; on lands that fall within 1.5 km of the Grange Castle Business Park and on the Milltown lands proposed for a 'Civic Amenity Site' or 'Bring Centre'. All on Development Plan Map 1. ([Draft0203](#))

2.22.31 22.31 SLO - Proposal - Hazelhatch

1. Request for a SLO for the development of the Grand Canal at Hazelhatch as a water-based activity and walking trails between Dublin and Kildare. ([Draft0107](#))

2.22.32 22.32 SLO - Proposed - Palmerstown

1. Request that a SLO is added as follows: "Where suitable development proposals are brought forward in Palmerstown, the Planning Authority will consider relaxing the provisions of the zoning matrix set out in Section 1 of this Plan in order to ensure the appropriate level of service provision in the village." ([Draft0118](#))

2.22.33 22.33 SLO 10 – Amendment

1. Amend SLO 10 – N4 Pedestrian Bridge to read: "Should more than 200 residential units be populated at the Liffey Valley Town Centre, the Council will, as an objective work to secure the provision of a high quality pedestrian bridge over the N4 to provide a spacious landscaped boulevard linking Liffey Valley Town Centre to the Liffey Valley High Amenity Area to the north." ([Draft0063](#))

2.22.34 22.34 SLO 13 - Amendment

1. Suggests deletion of the phrase 'or traffic roundabout' from SLO 13 – Palmerstown Traffic. ([Draft0063](#))

2.22.35 22.35 SLO 15 – Amendment

1. Amend SLO 15 – Newcastle Road – Parkland/Woodland to read: Vesey Park enhancement and protection Enhance and promote the small area of parkland/ woodland known as Vesey Park, which is entranced at Vesey Park estate and beside Moat House on the Newcastle Road. The prime objective should be [to] encourage more pedestrian visits to this park area and a study should be carried out to see if this is achievable. The possibility of turning some of the usable land into allotments should be considered. ([Draft0063](#))

2.22.36 22.36 SLO 19 – Amendment

1. Amend SLO 19 – Glenaulin Park Improvements to read: Continue to improve Glenaulin Park as neighbourhood park for a wide range of both active and passive recreational activities; in particular take measures to enhance the entrances to the park and to provide for additional car parking, as well as provide facilities for local clubs to improve access and security. ([Draft0063](#))

2.22.37 22.37 SLO 2 - Amendment

1. Add the following sentence to SLO 2 – Liffey Valley – Footpath and Cycleway "In addition the Council will seek to provide an additional pedestrian route linking St Edmundsbury/Woodville with Shacklton's Mill in Fingal and liaise with Fingal County Council regarding same." ([Draft0063](#))

2.22.38 22.38 SLO 3 - Amendment

1. Amend SLO 3 to read: "Commence public consultation process regarding the extension of the Special Amenity Area Order to include all of the lands at Lucan Demesne, the Embassy - owned lands, the area behind Lucan BNS, St Edmundsbury, Fonthill, Woodville, the Kings Hospital and Waterstown Park,

extending from the River Liffey up to the N4 and bordered by the Leixlip-Lucan Slip Road..." ([Draft0063](#))

2.22.39 22.39 SLO 30 - Amendment

1. Suggests adding the following sentence to SLO 30 – Grange Castle Business Park: "The Council will seek in the first instance to encourage businesses that provide high levels of employment" Reason: At present some of the companies that pay rates employ very small numbers of people but take up huge tracts of space. The land in SDCC is limited so we need a better mix of employer. ([Draft0063](#))

2.22.40 22.40 SLO 6 - Support

1. Supports SLO 6 – River Liffey and Grand Canal. ([Draft0107](#))

2.22.41 22.41 SLO 61 – Rathcoole (Removed)

1. Request that SLO 61 – Rathcoole, immediately north of the property, be deleted because construction is taking place on the site and there appears to be no evident planning purpose. ([Draft0215](#))

2.22.42 22.42 SLO 73 - Amendment

1. SLO 73 - Brittas Village - Planning Study Would like the reinstatement of the following sentence from the current Development Plan SLO 123: 'a reasonable development boundary be established for the study of the Brittas village'. ([Draft0071](#))

2.22.43 22.43 SLO68 Ballycullen/Stocking Lane - Review

1. SLO68 Ballycullen/Stocking Lane Distributor Road The road has been open for a number of years and has been provided with bus bays and a cycle track. Requests that the SLO be reviewed. ([Draft0289](#))

2.22.44 22.44 SLO93

1. The Ballyboden Village Area Masterplan SLO93 is not a statutory plan and has not been completed – yet the impression given by Draft Document is that it has been completed and is a LAP - this is wholly misleading ([Draft0258](#))

2.22.45 22.45 SLOs - undertaken

1. Request that the Plan provide that all SLOs provided for in the 2004 Plan be undertaken within two years of the adoption of this plan. ([Draft0018](#))

2.22.46 22.46 SLOs Support

1. Support for the following SLO's: SLO 1 – Liffey Valley – Amenity; SLO 4 – Liffey Valley – Regional Park; SLO 5 – Lucan – Church of Ireland School; SLO 8 – Palmerstown- Waterstown Park; SLO 11 – Libraries Building Programme; SLO 18 – Quarryvale Estate – Traffic Calming; support for SLOs 21-25; SLO 28 – 12th Lock Canal Bridge; SLO 29 – Clondalkin Theatre; SLOs 31-36 and 38-39. ([Draft0063](#))

2.22.47 22.47 Tallaght – Public Golf Course

1. SLO 72- The Department of Defence would request that it be consulted in relation to this development ([Draft0218](#))

2.23 23 Zoning Requests

2.23.1 23.1 Map 1

1. Seeking the rezoning of Somerton House in line with the adjoining Adamstown SDZ ([Draft0001](#))
2. Request rezoning from objective F to objective A ([Draft0037](#))
3. Requests that a car park be facilitated in the vicinity of Gaelscoil Naomh Padraig Castle Road Lucan for the use of parents dropping off and collecting children from the school. Suggests that the waste ground behind the school could be a place for a temporary car park. (No map included) ([Draft0053](#) [Draft0054](#) [Draft0055](#) [Draft0094](#))
4. Requests that a car park be facilitated in the vicinity of Gaelscoil Naomh Padraig Castle Road Lucan for the use of parents dropping off and collecting children from the school. Suggests that the waste ground behind the school could be a place for a temporary car park. ([Draft0052](#) [Draft0149](#) [Draft0143](#))
5. Would like to put forward the proposal that a provision for parking must urgently be considered on the waste ground behind the Gaelscoil Naomh Padraig Castle Road Lucan Co Dublin. This should be a temporary car park that is only open when parents are dropping off and collecting their children from school and thus reducing the opportunity for anti-social behaviour to take place in the car park. ([Draft0057](#))
6. Request that the lands at Cooldrinagh be rezoned from Greenbelt to EP3 lands and proposes the incorporation of an SLO to provide for a Park and Ride facility and petrol filling station. ([Draft0145](#))
7. The strip of land fronting Cooldrinagh Lane be rezoned for Residential development ([Draft0145](#))
8. Suggest rezoned lands proposed for park and ride facility Cooldrinagh from Objective B to GB ([Draft0105](#) [Draft0144](#))
9. Cooldrinagh land is of especial importance given its archaeological, geological and hydrodynamic importance and should be turned into a public park ([Draft0137](#) [Draft0138](#))
10. Support for the rezoning of 'Beatties Field' as follows: • The rezoning of the northern portion of Beatties Field from Zoning Objective B to Zoning Objective E • The rezoning of the southern section of the site from Zoning Objective B to Zoning Objective A, with a specific local objective to provide for a canal side village at densities of not more than 15 units/acre. ([Draft0126](#))
11. Request that land located at Brownstown (53 ha), close to Peamount Hospital, be rezoned as either EP2 or EP3. ([Draft0197](#))
12. Request to rezone lands at Finnstown from Zoning Objective 'F' to a zoning that would accommodate low density housing ([Draft0198](#))
13. Request rezoning from objective A to objective LC at Foxhunter, Ballydowd Lucan. ([Draft0253](#))
14. Request for the rezoning of lands at Finnstown House from Zoning Objective 'F' to Zoning Objective 'A' – To protect and/or improve residential amenity. ([Draft0220](#))

2.23.2 23.2 Map 2

1. Request for Rezoning of GB Lands at Newlands Cross and Naas Road for mixed use and to facilitate Gateway/Landmark type building at Naas Road ([Draft0012](#))
2. Request that the site be zoned Objective EP1 and not Objective EP2 as proposed ([Draft0165](#))
3. Request that lands be rezoned from Objective EP2 to Objective EP1 ([Draft0163](#))
4. Submit that because of its high profile and high employee catchment the Fonthill Retail Park should be zoned EP1 instead of proposed EP2 ([Draft0205](#))
5. Request rezoning of subject lands from EP2 to EP1 at Ballymount. ([Draft0206](#))
6. It is requested that the subject site at Coldcut Road be rezoned from objective F to objective EP1 ([Draft0213](#))
7. Rezoning request relating to lands situated immediately to the east of St. Brigid's Cottages north of the Naas Road and west and south of Monastery Road. The area of the land is approximately 3.24 hectares and is situated within the Draft Naas Road

Development Framework area. The subject lands are zoned Enterprise Priority 2 in the Draft County Development Plan 2010-2016. The submission sets out a case for the rezoning of the lands to Enterprise Priority 1. Given that the subject lands are located within the boundary of the Naas Road Development Framework, and zoned for mixed use development within the current Draft Development Framework it is considered that the Enterprise Priority One zoning would represent a more appropriate zoning for the lands. ([Draft0191](#))

8. Request rezoning of site at the Naas Road to maximise benefits from access to significant public transport. ([Draft0150](#))
9. Requests that lands located at Ballyfermot are rezoned from Objective 'E' to provide for Enterprise, Employment and Related Uses to Objective 'LC 'to protect, provide for and/or improve Local Centre Facilities'. ([Draft0136](#))
10. Request to rezone land located at the Dublin City Services Sports and Social Club, Coldcut Road (30 acres) as Zoning Objective 'EP1', incorporating recreational and community facilities for the benefit of the local community and that a local objective be attached to state that any proposals for the redevelopment of the site would be dependent on the delivery of the Luas Line F. ([Draft0222](#))

2.23.3 23.3 Map 3

1. Rezoning of GB and A1 Lands in Newcastle for Nursing Home ([Draft0009](#))
2. Rezone 5 acres at Ballybane from Industrial to petrol station and ancillary services use. ([Draft0022](#))
3. Support proposed request to rezone area of land in Western End of Newcastle Village as public park. ([Draft0047](#))
4. Zoning request to change the zoning of lands located at the Poitin Stil at Rathcoole from Zoning Objectives 'A' and 'F' to Zoning Objective 'LC'. The 'F' zoning is considered an anomaly as the land is currently used as a car park with no usage as open space for the residents of adjoining residential areas. Furthermore the land is located within the confines of the Department of Defence Inner Zone which is not conducive to quality residential living. ([Draft0015](#))
5. Rezone c5 acres at Hazelhatch from B to A1 ([Draft0092](#))
6. Lands at The Whins, Colmanstown, Rathcoole Requests, in light of the recent road improvements and the established uses on the site, that a suitable zoning (from zoning objective 'B' to zoning objective 'E') or LZO/SLO be put on the site to facilitate the continued use of and appropriate improvement and consolidation of development on the site. ([Draft0045](#))
7. Request the rezoning of c.25 acres of lands at Cornpark and Environs, Newcastle from Objective B to A1 ([Draft0050](#))
8. Rezoning request 71 acres of land- Sweeny's Lands, Peamount Road, Newcastle ([Draft0070](#))
9. Request that the remainder of Profile Park lands at Kilbride be rezoned from "F" to "EP2" ([Draft0119](#) [Draft0247](#))
10. Request that land located close to the proposed new ring road at Rathcoole be rezoned. ([Draft0017](#))
11. Request that lands at Hazlehatch Road Newcastle be rezoned from Objective B to Objective EP3 ([Draft0146](#))
12. Rezone 23.9ha to the west of Baldonnell Business Park and south of Casement Aerodrome from objective B to objective EP2 ([Draft0129](#))
13. Request the rezoning of c7.5ha to the west of Baldonnell Business Park and South of Casement Aerodrome from Objective B to Objective EP2 ([Draft0128](#))
14. Request that subject site at Fortunestown Lane be rezoned as Objective A/A1. ([Draft0006](#))
15. Request the rezoning of part of the subject site located outside the Department of Defence's approved security zone to EP3. (Option A) ([Draft0217](#))
16. Request to remove/reduce the Department of Defence's Recommended Security Zone from the County Development Plan and to rezone lands in the subject site to EP3 (Option B) ([Draft0217](#))

17. Requests that lands at Athgoe, Colmanstown and Keatingspark (c.110ha) be rezoned from 'B' zoned land to uses associated with Enterprise and Employment ('E' zoned land). ([Draft0135](#))
18. Request rezoning to the north of Peamount of c200 acres of land for EP3 purposes. (Option A) ([Draft0229](#))
19. Request rezoning to the south of Peamount of circa 125acres of land for EP3 purposes. (Option B) ([Draft0229](#))
20. It is submitted that in the event that zoning is permitted within the approach zone to Casement Aerodrome, additional zoning to the south of Peamount would provide an effective link between the Grande Castle and Greenogue Industrial Estates and would facilitate the delivery of an additional length of the Western Orbital Road. ([Draft0229](#))
21. It is submitted that the lands at Peamount outlined in both options should be rezoned for enterprise priority three purposes, in the event that South Dublin County Council do not wish to pursue both rezoning proposals, they are invited to choose that option which is considered most appropriate. ([Draft0229](#))
22. Propose rezoning of lands on Garters Lane from Objective F to Objective A ([Draft0261](#))
23. Request rezoning of lands from Objective B to Objective A at Boherboy Saggart Co Dublin ([Draft0280](#))
24. Request rezoning from 'Objective F' - to preserve and provide for Open Space and Recreational Amenities to 'Objective A' – To protect and/or improve residential amenity as an amendment to the draft South Dublin County Development Plan at Tassaggart Gardens. ([Draft0242](#))
25. Request that land to the west of Newcastle village be de-zoned to recreational land use and that multiple pitches be provided for use by local clubs. (The land has been reposed) ([Draft0214](#))
26. Request that lands at Johnstown Road, Rathcoole (8.4 ha) be rezoned to provide for housing. ([Draft0215](#))
27. Requests further consideration of rezoning for Enterprise and Employment purposes of lands comprising 11.5 acres located within the Department of Defence Inner Zone Limit to the east of Casement Aerodrome ([Draft0190](#))
28. Request for the reinstatement of the Local Centre zoning on that section of lands at the Golf Village, which accommodate the golf village building and zoned Local Centre in Variation No. 5 of the County Development Plan (12th May 2008), by way of amendment to the draft South Dublin Development Plan as published. ([Draft0223](#))
29. Request the rezoning of the balance of the lands at the Golf Village from 'Green Belt' to 'Local Centre' also by way of amendment to the draft South Dublin Development Plan 2010. ([Draft0223](#))
30. Request to rezone the lands that accommodate the Westpark apartments, within the grounds of the Citywest Hotel from Objective F to Objective A – To protect and/or improve residential amenity. ([Draft0226](#))
31. 2 Options provided for rezoning of Lands at Peamount from Objective B to Enterprise Priority 3 ([Draft0193](#))
32. Options provided: A) the proposed rezoning to the north of Peamount of c.200 acres (80.8 hectares) of land for EP3 purposes B) the proposed rezoning to the south of Peamount of c.125 acres(50.4 hectares) of land for EP3 purposes • In the event of zoning being permitted in the approach zone of Casement Aerodrome additional zoning to the south of Peamount would provide an effective link between the Grange castle and Greenogue estates and would facilitate the delivery of an additional length of the western orbital road ([Draft0193](#))

2.23.4 23.4 Map 3 and 4

1. Request for the extension of the EP2 zoning on lands at Baldonnell (c. 1ha or 2.4 acres in the western corner) "To facilitate opportunities for manufacturing, research and development facilities, light industry and employment and enterprise uses in industrial areas and business parks". ([Draft0127](#))

2.23.5 23.5 Map 4

1. Seeking the rezoning of lands adjoining Broadfield Manor at Rathcoole from 'B' zoning to 'A' zoning. No map included. ([Draft0002](#))
2. Rezone 0.6 hectares of land at Kiltipper Road, Tallaght from objective G to objective A. ([Draft0007](#))
3. Rezone all undeveloped land on the Main Road from Tallaght Village to the site of Bryan s Ryan, to lower density levels, restrict the height to 2 story in line with residential units nearby and to set back any development from the existing Main Road. ([Draft0065](#) [Draft0101](#) [Draft0110](#) [Draft0111](#) [Draft0112](#) [Draft0115](#))
4. The Esso site in Tallaght should be rezoned or if necessary a land swap done in order for SDCC to take ownership of this important site to provide community facilities ([Draft0065](#) [Draft0101](#) [Draft0102](#) [Draft0110](#) [Draft0111](#) [Draft0112](#) [Draft0115](#))
5. The council should dezone the Fruitfield site on the Blessington Rd site or else cut a deal with Fruitfield whereby the Belgard Rd site should be zoned for Educational, Hospital or Community purposes ([Draft0065](#) [Draft0101](#) [Draft0102](#) [Draft0110](#) [Draft0111](#) [Draft0112](#) [Draft0115](#))
6. Rezoning Request from Objective G to A at lands at the Old Mill Public House, Old Bawn. ([Draft0030](#))
7. Request to retain LC zoning on lands at Old Mill Public House, Old Bawn ([Draft0030](#))
8. Alternative request to rezone from Objective G to LC on lands at Old Mill Public House, Old Bawn providing natural extension to current LC zoning ([Draft0030](#))
9. Rezoning request from Objective EP3 to A on c.13.5 acres of land at Kingswood, Baldonnell Lower- Lands comprise of Baldonnell House (RPS ref 192) ([Draft0031](#))
10. Request for the rezoning of lands located between 56 Forest Close and Forest Lodge, Kingswood Heights from Objective 'F' to Objective 'A'. ([Draft0034](#))
11. Request for the rezoning of lands at Forest Lodge, Forest Close from zoning Objective 'F' to zoning objective 'A'. ([Draft0035](#))
12. Suggest rezoning lands at Jacobs Factory Site, Belgard Road from Objective EP2 to EP1 ([Draft0059](#))
13. The Council should dezone the Blessington Road site or else cut a deal with Fruitfield whereby the Belgard Rd site should be zoned for Educational, Hospital or Community purposes. ([Draft0102](#))
14. The lands at West Oldcourt are zoned objective A1, propose that part of lands be designated LC ([Draft0199](#))
15. Request that lands be rezoned from proposed objective EP2 to objective A1 ([Draft0201](#))
16. Consider that Airtion Road should be zoned as EP1 ([Draft0207](#))
17. Request that the lands at Rockbrook Park School and its hinterland be designated and consolidated in zoning terms as an educational institution ([Draft0132](#) [Draft0231](#))
18. All residential areas in Kingswood Village area should be rezoned as Objective A. ([Draft0106](#))
19. The grounds of Roadstone Social Club and Clondalkin Rugby Club should be rezoned from LC to F which is To preserve and provide for Open Space and Recreational Amenities to reflect their existing use as Open Space ([Draft0106](#))
20. Propose new SLO "It will be an objective of this County Development Plan to provide a traffic calming scheme along the Old Naas Road from the area south of the Maldron Hotel at Kingswood House to the turn off from the Old Naas Road into the Citywest Business Park before the Luas extension to Citywest is opened in 2011 in the interests of the safety of residents and pedestrians in the Kingswood Village area." ([Draft0106](#))
21. Request that the lands be rezoned from objective E to objective LC. ([Draft0141](#))
22. Proposal to include land north of Boherboy Road in Development Plan. The land is farmed and is completely surrounded by roads and developments. Large areas of land on the opposite side of the Boherboy Road have been zoned for housing and a large number of houses have been built. Farming is no longer viable due to this development. ([Draft0194](#))
23. Requests that lands located at Greenhills Road are rezoned from Objective 'E' to provide for Enterprise, Employment and Related Uses to Objective 'LC 'to protect, provide for and/or improve Local Centre Facilities'. ([Draft0142](#))

24. Lands at Kiltipper Road (c.6.7 ha) Request that lands at Kiltipper Road (c.6.7 ha) be rezoned to accommodate an appropriate form of development to a character and density of immediately adjoining lands with an objective to provide for a river side walkway. ([Draft0160](#))
25. Request that lands at Kingswood (11.5 acres) be rezoned for 'Enterprise and Employment' purposes. ([Draft0228](#))
26. Request for the rezoning of lands (c.30 acres) at Corkagh from Objective 'F' to objective 'EP2'. ([Draft0109](#))
27. Suggest land at Firhouse Convent should be rezoned back from A1 to G as a matter of priority, and annexed into the Dodder Valley Linear Park. ([Draft0158](#))

2.23.6 23.6 Map 5

1. Requests that the subject lands at 1-3 Whitehall Road West, are rezoned from objective A to objective LC. ([Draft0155](#))
2. Rezoning of Marlay Grange House and 12 acres of land from Zoning Objective F to Zoning Objective A. Or A new Specific Local Objective: "Facilitate the sensitive development of the lands adjoining Marlay Grange House, to the south of Grange Road in Rathfarnham, for high quality (not more than 2 houses to the acre) low density residential development having regard to: • Protection of the integrity of the protected structure and its cartilage • Protection of existing mature trees and subject to detailed Arborist assessment • Protection of the amenity of the overall setting, shelter development from road and visual impact of adjoining park • Subject to necessary infrastructure upgrades for piped services." ([Draft0108](#))

2.23.7 23.7 map 5A

1. Rezoning land at Ballyboden, Rathfarnham, from A to DC. ([Draft0175](#))

2.23.8 23.8 Map 6

1. Request for rezoning of land located at Kiltipper from agricultural to residential. ([Draft0016](#))
2. Request that the subject lands be rezoned from Objective B to objective EP3. ([Draft0219](#))
3. Request the rezoning of lands east of Brittas village from objective H to Objective A1 with an SLO to provide local shopping/enterprise in rural village setting. ([Draft0235](#))
4. Request the rezoning of lands at Brittas Ponds from Objective H to Objective F with an SLO to provide for an integrated recreation and tourism facility. ([Draft0235](#))
5. Re-zone 22 ha of land at Bustyhill, Rathcoole from zoning objective B to objective EP3 ([Draft0166](#))

2.23.9 23.9 Map 7

1. Seeks the rezoning of lands located adjoining the N81 (c. 15 acres) at Kiltalown to 'A1 – To provide for New Residential Communities in Accordance with Approved Local Area Plans'. ([Draft0209](#))
2. Seeks the suitable rezoning of a portion of the lands (c.3.5 acres) at Kiltalown located to the south of the landholding (currently occupied by a large house and out-buildings) to allow for the development of a nursing home and related uses. ([Draft0209](#))

8. Recommended Changes Draft County Development Plan

Summary of Recommendations

Section	Recommendation
Introduction and Core Strategy	
0.2 Core Strategy	<p>Recommendation That the core strategy be altered to include;</p> <ul style="list-style-type: none"> • the population figures as are in the Draft Regional Planning Guidelines for the Greater Dublin Area • reference to the retail hierarchy as is in the Draft Development Plan • reference to the built area of South Dublin County Council being an important part of the Dublin Gateway as defined by the National Spatial Strategy. • Include a schematic drawing of the core strategy.
0.4.4 Environmental Impact Assesment	<p>Recommendation Alter heading of Section 0.4.4 from “Environmental Impact Assessment” to “Environmental Assessment”, introduce “Environmental Impact Assessment” as Section 0.4.4.1 and “Strategic Environmental Assessment”, as Section 0.4.4.2</p> <p>Section 0.4.4.2: Strategic Environmental Assessment The Council is committed to ensure full compliance with the SEA Directive (Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment) as transposed into Irish Law through the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (SI No. 436 of 2004).</p>
A Living Place	
Housing	
1.2.14.iii Policy H3: Brownfield Site Densities	<p>Recommendation: To amend Policy H3 to read: It is the policy of the Council to maximise any land which has been subjected to building, engineering or other operations, excluding temporary uses or urban green spaces and in particular to maximise redundant industrial lands identified as Enterprise Priority One zoned lands to consolidate the County and where such sites are identified that are close to existing or planned future public transport corridors, the opportunity for their redevelopment to higher</p>

	<p>densities will be promoted, subject to safeguards outlined in Sustainable Neighbourhoods in Section 1.4 and in accordance with Local Area Plans or Approved Plans.</p>
<p>1.2.51 Management of One- Off Housing in Rural Areas</p>	<p>Recommendation</p> <p>Amend Draft Development Plan to include the following policy amendment to state:</p> <p>Notwithstanding the assessment criteria relating to the rural, mountain and high amenity zones outlined above, and in accordance with Circular SP5/08, a bone fide applicant who may not already live in the area, nor have family connections there or be engaged in a particular employment or business classified within the local needs criteria, will be given due consideration within the proper planning and sustainable development objectives for the area subject to the following considerations:</p> <ul style="list-style-type: none"> - applicants will be required to satisfy the planning authority of their commitment to operate a full-time business from their proposed home in a rural area, as part of their planning application (to discourage commuting to towns and cities); - applicants will be required to outline how their business will contribute to and enhance the rural community; and - applicants will be required to satisfy the planning authority that the nature of their employment or business is compatible with those specified in the local needs criteria for rural areas so as to discourage applicants whose business is not location-dependent (e.g. telesales or telemarketing).' <p>All planning applications for houses in rural areas, regardless of where the applicant comes from or whether they qualify under specific criteria, will continue to be determined on the basis of the proper planning and sustainable development of the area, in accordance with the core strategy of this Development Plan and in particular the Development Plan policies regarding environmental concerns.</p>
<p>1.2.53 Domestic Effluent Disposal</p>	<p>Recommendation</p> <p>Amend Section 1.2.53 as follows.</p> <p>(1) Replace the second paragraph with the following: "On sites where the use of a septic tank or alternative treatment system is proposed, the proposed tank or system and the percolation area shall comply with the requirements of the Code of Practice: Wastewater Treatment and Disposal Systems Serving Single Houses (p.e < 10), (EPA, 2009) (or as may be amended from time to time)."</p> <p>(2) Delete the third paragraph.</p> <p>(3) Replace the final sentence in the fourth paragraph with the following revised text; "The Site Characterisation Form in Annexe C.3 of the Code of Practice: Wastewater Treatment and Disposal Systems Serving Single Houses (p.e < 10) (EPA, 2009) shall be used for this purpose regardless of the type of</p>

	system proposed.”
Social Inclusion, Community Facilities and Recreation	
1.3.21 Childcare and Pre School Facilities	<p>Recommendation Rewording of Policy SCR 28 to read “ It is the policy of the Council to facilitate and support through the planning process the location of childcare and pre-school facilities on the same campuses as primary and secondary schools or adjacent to primary and secondary school campuses.”</p>
1.3.41 Allotments	<p>Recommendation Remove the third paragraph of section 1.3.41 Allotments. The second paragraph of this section should now read; Allotments have been constructed in a number of public parks and they have been an outstanding success to date. It is an objective of the Council to provide allotments in parks taking into consideration the demand for the facilities and the presence of a high level of supervision within the park. Allotments offer the opportunity to provide education in horticulture as well as on the sustainable value of home food production.”</p>
Sustainable Neighbourhoods	
1.4.36 Climate Sensitive Design	<p>Recommendation Insert new section in Living Place - Sustainable Neighbourhoods as follows: Parking and hardstanding areas shall be constructed in accordance with the Managers Recommendations of the Greater Dublin Strategic Drainage Study for Sustainable Urban Drainage Systems (SuDS) and include measures to prevent drainage from hardstanding areas entering onto the public road. (see also Section 2.3.9 - Ground and Surface Waters)</p>
A Connected Place	
2.2.2 National and regional Context	<p>Recommendation Amend the fourth paragraph of Section 2.2.2 by inserting the following new sentence after ‘Saggart’: The County is now well served by public transport and is accessible and this adds to the County’s attractiveness as a</p>

	tourism location.																				
2.2.3 Strategy Policy T19	<p>Recommendation Amend Section 2.2.25.i to replace the existing policy statement with the following revised statement: It is the policy of the Council to protect the capacity, efficiency and safety of national routes, including junctions, and to keep the number of junctions to a minimum consistent with good traffic management.</p>																				
2.2.8 Quality Bus Corridors	<p>Recommendation Amend Section 2.2.8 by inserting the following at the end of the second paragraph: The list of routes in the QBC network within the County is non-exhaustive and additional schemes may be progressed during the lifetime of the Plan.</p>																				
2.2.11.i Policy T5: Luas Rail Transit (LRT) Extension	<p>Recommendation Amend Section 2.2.11.i to insert the following: “ and to reserve the final alignment of the preferred route when it has been agreed.”</p>																				
2.2.34 Car Parking Standards Table 2.2.4 General Car parking Standards Related to land Use	<p>Recommendation (3) Amend Section 2.2.34 to insert the following additional table and (4) amend Table 2.2.4 to omit Retail Centres and Retail Stores.</p> <p>Parking Standards Relating to Retail Uses</p> <table border="1" data-bbox="658 802 1541 1295"> <thead> <tr> <th data-bbox="658 802 846 903"></th> <th colspan="2" data-bbox="846 802 1193 903">Public Transport Corridors</th> <th colspan="2" data-bbox="1193 802 1541 903">General</th> </tr> <tr> <th data-bbox="658 903 846 970">Land Use</th> <th data-bbox="846 903 1021 970"><1000m²</th> <th data-bbox="1021 903 1193 970">>1000m²</th> <th data-bbox="1193 903 1368 970"><1000m²</th> <th data-bbox="1368 903 1541 970">>1000m²</th> </tr> </thead> <tbody> <tr> <td data-bbox="658 970 846 1134">Retail - Food</td> <td data-bbox="846 970 1021 1134">1 space per 40m² gross floor area</td> <td data-bbox="1021 970 1193 1134">1 space per 25m² gross floor area</td> <td data-bbox="1193 970 1368 1134">1 space per 25m² gross floor area</td> <td data-bbox="1368 970 1541 1134">1 space per 20m² gross floor area</td> </tr> <tr> <td data-bbox="658 1134 846 1295">Retail – Comparison only</td> <td data-bbox="846 1134 1021 1295">1 space per 40m² gross floor area</td> <td data-bbox="1021 1134 1193 1295">1 space per 40m² gross floor area</td> <td data-bbox="1193 1134 1368 1295">1 space per 25m² gross floor area</td> <td data-bbox="1368 1134 1541 1295">1 space per 25m² gross floor area</td> </tr> </tbody> </table>		Public Transport Corridors		General		Land Use	<1000m ²	>1000m ²	<1000m ²	>1000m ²	Retail - Food	1 space per 40m ² gross floor area	1 space per 25m ² gross floor area	1 space per 25m ² gross floor area	1 space per 20m ² gross floor area	Retail – Comparison only	1 space per 40m ² gross floor area	1 space per 40m ² gross floor area	1 space per 25m ² gross floor area	1 space per 25m ² gross floor area
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	Retail - Shopping Centres & Stores (including Food)	1 space per 40m ² gross floor area	1 space per 25m ² gross floor area	1 space per 25m ² gross floor Area	1 space per 20m ² gross floor area	Parking Standards Relating to Retail Uses
2.2.34 Parking Standards	<p>Recommendation Amend Section 2.2.34 to revise footnote (2) to Table 2.2.4 to read as follows: All parking bays in surface and multi-storey or basement parking areas (other than those reserved for disabled persons) shall be 2.5m in width and 4.74m in length, exclusive of any structural pillars and other obstacles.</p>					
2.3.5 Water Supply and Drainage	<p>Recommendation Amend Section 2.3.5 to: (3) insert “The Provision and Quality of Drinking Water in Ireland – A Report for the Years 2007- 2008, (EPA, 2009)” in place of the outdated title to the report, and (4) insert the following at the end of the first paragraph: “The council will have regard to the Drinking Water Advice Notes 1 – 5 (EPA) where appropriate and relevant for South Dublin.”.</p>					
2.3.8.i Policy WD2: Wastewater Treatment Plants and Wastewater Collection Systems	<p>Recommendation Amend Section 2.3.8.i to replace “2004-2005 (2007)” with “2006-2007 (EPA 2009)”</p> <p>Recommendation Amend Section 2.3.8.i to insert the following at the end of the final paragraph: The wastewater collection system in South Dublin is subject to the Waste Water Discharge (Authorisation) Regulations. Dublin City Council acts on behalf of South Dublin County in regard to obtaining the relevant licence from the EPA.</p> <p>Recommendation Amend Section 2.3.8.i to insert the following: It is an objective of the Council to have regard, when they are adopted, to the objectives and management practices proposed by the Dublin Bay Master Plan and the Coastal Zone Management Plan, where relevant and appropriate.</p>					

<p>2.3.9 Ground and Surface Waters</p>	<p>Recommendation Amend Section 2.3.9 to insert the following: It is an objective of the Council to ensure that salmonid waters constraints are applied to any development in the Liffey and Dodder river catchments, including Bohernabreena Reservoir, which are recognised to be exceptional with regard to supporting salmonid fish species.</p> <p>Recommendation Amend Section 2.3.9 to insert the following after the first paragraph: It is an objective of the Council that undeveloped lands adjacent to surface waters, particularly salmonid river systems, be retained in their open natural state in order to prevent habitat loss and aid in pollution detection, while providing open space and recreational amenity for river users.</p> <p>Best management practice shall be implemented at all times in relation to any activities that may impact on riverine or riparian habitats. Any planned discharges to surface streams shall not impact negatively on the salmonid status of the system. The design and construction of any surface water outfall chambers to rivers shall be implemented in an ecologically sound and fisheries-sensitive manner. The use of concrete (or other toxic materials) at riparian and in-stream locations should only occur in the dry to prevent contamination of adjacent surface waters.</p> <p>Amend Section 2.3.9 further (7th overall bullet point) to require in developments adjacent to watercourses, that any structure must be set back a minimum distance of 10m from the top of the bank to allow access for channel cleaning and maintenance, unless otherwise agreed with the Planning Authority. This may be increased depending on the size of the watercourse and any particular circumstances.'</p>
<p>2.2.37 Road Objectives</p>	<p>Recommendation: Section 2.2.37 Road Objectives Minimise the impact of the construction and operation of roads and watercourse crossings on fish and their habitat and other wildlife habitats, e.g. crossing points for badgers etc., through consultation with appropriate authorities, and through implementing 'Requirements for the Protection of Fisheries Habitat during the Construction and Development Works at River Sites'.</p>
<p>2.3.10.i Policy WD3: Quality of Surface Water and Groundwater</p>	<p>Recommendation Amend Section 2.3.10.i by inserting a new paragraph to read as follows: It is an objective of the Council that sufficient conveyance capacity should be available within the receiving sewerage system locally and sufficient treatment capacity should be available downstream at the relevant Waste Water Treatment Plant, to ensure ecological integrity.</p>
<p>2.3.11 Water Quality Management</p>	<p>Recommendation</p>

Plan	Amend Section 2.3.11 to insert the following additional paragraph: It is an objective of the Council to ensure the effective implementation of the surface water environmental quality standards to be set out in the European Communities Environmental Objectives (Surface Waters) Regulations 2008, which address the WFD (2000/60/EC) and the Dangerous Substances Directive (2006/11/EC), when these regulations become effective.
2.3.12.i Policy WD5: Water Quality Management Plans	Recommendation Amend Section 2.3.12.i to replace “when adopted” with “and any future amendments”
2.3.21 Risk of Flooding to 2.3.26 Policy Inclusive	Recommendation Amend all references to the Draft Guidelines 2008 to read “The Planning System and Flood Risk Management - Guidelines for Planning Authorities, November 2009”.
2.3.21 Risk of Flooding	Recommendation Insert an additional bullet point after final bullet point in Section 2.3.21 (page 121) to read as follows: To ensure the protection, management, and as appropriate, enhancement, of existing wetland habitats where flood protection/management measures are necessary.
2.3.25 Flood Risk Assessment and Management Plans	Recommendation SLO: The areas of flooding potential as indicated in the Dodder Catchment Flood Risk Assessment Management Study (CFRAMS) and the OPW “alluvial soils” floodplain maps are to be taken into account along with the requirements of Section 5 of The Planning System and Flood Risk Management Guidelines (November 2009) when assessing planning applications, with a view to restricting or, if necessary, refusing development proposals within such areas in order to avoid flooding events.
2.4.5 Waste Management Plans	Recommendation Amend Section 2.4.5 to omit the word ‘further’.
2.4.6.ii Policy ES3: Recycling and Composting Targets	Recommendation Amend Section 2.4.6.ii to replace “composting” with “biological treatment”.
2.4.7 Waste Management Regulations	Recommendation Amend Section 2.4.7 to insert the additional bullet point Biodegradable waste
2.4.12.i Policy ES7: Waste Hierarchy	Recommendation Amend Section 2.4.12.i to replace “composting” with “biological treatment”.
2.4.17 Construction Demolition Waste, Landfill Sites, Refuse Transfer	Recommendation Page 130, Paragraph 8; replace ‘will’ with ‘shall’ and ‘interference’ with ‘threat’ and refer to the Department of

Stations and Unauthorised Waste Disposal	Defence, so that second sentence reads <i>'The Irish Aviation Authority and the Department of Defence shall be consulted regarding potential threat to aviation through bird hazard in relation to such facilities'</i>
2.4.26 Policy ES17: Air Quality	<p>Recommendation Amend Section 2.4.26 Policy ES17 to read 2.4.26.i Policy ES17</p> <p>Amend Section 2.4.26 to insert the following: 2.4.26.ii South Dublin County Council has recently adopted the <i>Air Quality Management Plan for the Dublin Region 2009-2012</i> under the provisions of the <i>Air Pollution Act 1987</i>. This plan is primarily directed at protecting the valuable asset of good air quality in this county and the region, and ensuring that adverse air quality does not impact on the most vulnerable of the population whether their vulnerability is due to occupation, age, existing health conditions or other factors.</p> <p>In conjunction with the EPA and the other Dublin local authorities the main air pollutants to be measured and monitored during the lifetime of this Air Quality Management Plan are smoke and particulate matter, Sulphur Dioxide (SO₂), Nitrogen Dioxide (NO₂), Carbon Dioxide (CO₂), Lead and Benzene.</p>
2.5.2 Background	<p>Recommendation Amend Section 2.5.2 to insert the following introductory comment The White Paper 'Delivering A Sustainable Energy Future For Ireland' sets out the Government's Energy Policy Framework 2007-2020 to deliver a sustainable energy future for Ireland. The Government's over-riding policy objective is to ensure that energy is consistently available at competitive prices with minimal risk of supply disruption.</p> <p>Strategic Goals of particular relevance to land use planning, include: addressing climate change by reducing energy related greenhouse gas emissions; accelerating the growth of renewable energy sources; promoting the sustainable use of energy in transport; maximising energy efficiency and energy savings across the economy; delivering electricity and gas to homes and businesses over efficient, reliable and secure networks; and ensuring an integrated approach to energy policy across all government departments and agencies.</p>
2.5.14.i Policy EC9: Service Providers and Energy Facilities	<p>Recommendation Amend Policy EC9 (Section 2.5.14.i) to insert "Eirgrid" after "Bord Gais"</p>
2.5.8 Telecommunications Antennae and Support Structures	<p>Recommendation (i) Amend the third and fourth paragraphs of Section 2.5.8 to insert "primary and secondary schools and childcare</p>

	<p>facilities”, in place of “schools”.</p> <p>(ii) Amend the fifth paragraph of Section 2.5.8 to insert “residential areas/primary and secondary schools/childcare facilities/hospitals”, in place of “residential areas/schools/hospitals”.</p> <p>(iii) Amend the sixth paragraph of Section 2.5.8 to insert “primary and secondary schools/childcare facilities” in place of “schools”.</p> <p>(iv) Replace the fourth bullet point in Section 2.5.8 with the following “That the beam of greatest intensity from a base station does not fall on any part of the grounds or buildings of a primary or secondary school or childcare facility, without agreement from the management of the school/facility and the parents of children attending the school/facility. Where an operator submits an application for planning permission for the installation, alteration or replacement of a mobile phone base station, whether at or near a primary or secondary school or childcare facility, the operator must provide evidence that they have consulted with the relevant body of the school or childcare facility.”</p> <p>Recommendation Amend the draft plan to omit the sixth paragraph of Section 2.5.8.</p> <p>Recommendation Amend final bullet point in Section 2.5.8 to omit the following text: “(Up to 300 GHz)”</p>
<p>2.5.9 Renewable Energy</p>	<p>Recommendation It is recommended that the following policies be added to the Development Plan;</p> <ul style="list-style-type: none"> • That a County Energy Policy be prepared which will identify current and future demand; improve efficiency to reduce demand; increase share of renewables in supply and ensure diversity in supply. • That the energy mapping system be rolled out throughout the County on an appropriate phased basis.
<p>A Busy Place</p>	
<p>3.2.8 Strategic Employment Location Categories EP1,EP2,EP3</p>	<p>Recommendation New Policy: It is recommended that that the additional policies shall include the following: Offices over 1,000 m² in EP2 areas shall be considered in areas where the planning authority is satisfied that there is sufficient public transport provision and the scale of the office reflects the existing scale and layout of the existing area. Underground car parking will not be considered appropriate for such uses in EP2 locations.</p> <p>Change Matrix to indicate that Offices over 1,000 m² are ‘Open For Consideration’ subject to the above policy.</p>

<p>Section 3.2.9.viii Policy EE10 Mixed-Use in Enterprise Priority One Zoned Lands</p>	<p>Recommendation Insert SLO 74 Naas Road – Junction Reorganisation and new Luas Stop</p> <p>Facilitate the reorganisation and relocation of the ‘Hamburger Junction’ at the junction of the Nangor Road, Long Mile Road with the Naas Road traffic, to provide the potential for a new Luas Stop in accordance with the Naas Road Development Framework.</p>
<p>Policy EE39: Restriction Area at Baldonnell Airport</p>	<p>Recommendation Retain the restricted area designation, and incorporate boundary revisions in Development Plan maps (following provision of information by the Department of Defence).</p>
<p>Section 3.2.22 Weston Executive Aerodrome</p>	<p>Recommendation Section 3.2.22; first paragraph; delete text <i>‘Drawing No. EDAX 9702/CO9 Revision 1 (to a scale of 1:10,000) prepared by Aer Rianta Technical Consultants and lodged by Weston Aerodrome with the Council in pursuance of a direction issued by the Irish Aviation Authority (NTR.02 – 27/08/1998)’</i> and insert replacement text <i>‘Drawing – ‘Safeguarding Map for Weston Aerodrome’ (to a scale of 1/10560) prepared by GPS Surveying Ltd. of Newmarket House, Co. Cork dated 10 January 2003 and lodged by Weston Aerodrome with South Dublin County Council in pursuance of a direction issued by the Irish Aviation Authority (NR T.02 Issue 4 Date 02.09.04 – Aerodrome Safeguarding Maps) in [pursuance of Articles 8 and 23 of the Irish Aviation Authority (Aerodromes and Visual Aids) Order, 2000, (S.I. No. 334 of 2000)’</i>.</p> <p>Paragraph 3.2.22: Delete the following text: <i>‘In the six inner Approach Areas to Casement and Weston Aerodromes (coloured solid red on the Development Plan Index Map) and in the Casement Aerodrome Security Zone (coloured grey on the Development Plan Index Map), no new development is permitted’.</i></p> <p>Paragraph 3.2.22: Insert the following replacement text: <i>‘In the document ‘Review of Policy at Casement Aerodrome, Baldonnell, Co. Dublin’ (January 2009), Public Safety Zones have been introduced within the existing ‘red zones’. No development whatsoever is permitted within the Public Safety Zones. However, within the ‘red zones’, some development is permissible whereby the development could not reasonably expect to increase the number of people working or congregating in or at the property. This may include development such as the extension of an existing dwelling or a change of building use. However new developments with a high intensity of use would continue to be prohibited. Height restrictions would continue to apply to developments in the environs of the Aerodrome. In the inner Approach Areas to Weston Aerodrome (coloured</i></p>

	<i>solid red on the Development Plan Index Map), no new development is permitted'.</i>
3.2.23 Major Accidents Directive	<p>Recommendation The consultation distances, contained within Table 3.2.1 will be changed to represent the figures furnished by the HSA to incorporate the following: Irish Distillers – Consultation Distance 300m Tibbet&Britten Group Ltd – Consultation Distance 300m BOC – Consultation Distance 700m</p> <p>Furthermore, the locations of the SEVESO sites will be mapped on the Development Plan maps.</p>
Town District and Local Centres	
3.3.24.i Policy TDL23: Village Consolidation and Expansion	<p>Recommendation It is recommended that the policy should therefore read:</p> <p>“It is the policy of the Council that all new development will consolidate the existing character of village settlements within the County and will be subject to the Sustainable Neighbourhoods section of the plan.”</p>
Retailing	
3.4.3.iii Neighbourhood/Small Town/Village Centre	<p>Section 3.4.3.iii Neighbourhood/Small Town/Village Centre will be amended as follows Small Town/Village Centre “These centres usually provide for one supermarket or discount foodstore generally ranging in size from 1,000-1,500m2 with a limited range of supporting shops and retail services, cafes and possible other services such as post offices or community facilities or health clinics grouped together to create a focus for the local population.</p>
A Protected Place	
Archaeological and Architectural Heritage	
4.2.5 Strategy	<p>Recommendation Insert a new statement in section 4.2.5 Strategy</p> <ul style="list-style-type: none"> • Continue to examine and reassess the architecture of the County with a particular focus on the protection of more modern structures of exceptional quality. <p>No other changes recommended.</p>
4.2.8 Conservation of Buildings	Recommendation

Structures and Sites	<p>Under Policy AA6: Areas of Archaeological Potential- following on from the listed areas of Archaeological Potential in the County the following paragraph will be inserted;</p> <p>Where it is appropriate, the Council, in conjunction with the Heritage and planning Division of the Department of Environment, heritage and Local Government, will identify and designate as 'Archaeological Landscapes' areas that contain clusters of Recorded Monuments, or areas that contain very important sites. This will allow for the protection of the setting and environs of Recorded Monuments.</p>
Landscape, Natural Heritage, and Amenities	
Section 4.3.6	<p>Recommendations Recheck boundaries of SAC's and pNHA's.</p>
River and watercourses Section 4.3.7.xviii and 4.3.7 xix	<p>Recommendations Amend 4.3.7.xviii Policy LHA20 first bullet point to read "Dedicate a minimum of 10m each side of the waters edge for amenity, biodiversity and walkway purposes where practical; this may be increased depending on the size of the watercourse and any particular circumstances.</p>
Biodiversity 4.3.7.xvii 4.3.7xix	<p>Recommendations Insert in the explanatory text for Policy LHA19 Flora and Fauna:- 'In conjunction with the National Parks and Wildlife Service, the Council will require impact assessment of proposed development in Brittas and Aghfarrell on the feeding areas of protected Greylag Geese'</p> <p>'The Council will help ensure that any E.U and Nationally protected species are not place under further risk of reduction in population size.'</p> <p>To be inserted after 'In conjunction with other agencies, the Council will endeavour to prevent the loss of woodlands, hedgerows, aquatic habitats and wetlands wherever possible, " including requiring a programme to monitor and restrict the spread of invasive species such as those located along the River Dodder".</p> <p>Add to Section 4.3.7 vii: The Council will fulfil the requirements of the National Parks and Wildlife Service <i>Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities (December 2009)</i> for projects and plans.</p> <p>Insert in SLO7 The design of any proposed future <i>lighting</i> of the Liffey Bridge shall be subject to assessment of the</p>

	<p>impact of lighting on bat roosting, hunting and movements.'</p> <p>Insert in Policy LHA9 Replace 'arising from this Plan will' within the explanatory text beneath LHA9 with 'arising from this plan and proposed amendments to the adopted Plan will'</p> <p>Replace 'Where relevant, projects will be screened', with 'Projects noted within the National Parks and Wildlife Service <i>Appropriate Assessment of Plans and Projects in Ireland-Guidance for Planning Authorities</i> (December 2009) document will be screened.</p> <p>Insert in Policy LHA15 replace following text within LHA15 (4.3.7.xiii) Heritage and Biodiversity Plan, 'prepare a County Biodiversity Plan following public consultation' with 'prepare a County Biodiversity Plan following public consultation, and within the lifetime of the Plan'.</p> <p>Green City Guidelines. The last sentence on page 75 (part of 1.4.6.i Character Appraisal) should be amended as follows:- The site survey and analysis will show where existing landscape features exist on site including for example, existing trees, hedgerows, water bodies and interesting/protected structures. This analysis will serve to inform, at an early design stage, the location of proposed open space, parks and green corridors, where it can most benefit the retention of existing ecology as required by policy LHA18 Green City Guidelines, and integrate it into the neighbourhood.</p> <p>Furthermore it is recommended that a new policy be inserted in LHA18 which states:-</p> <p>Policy LHA18 Green City Guidelines. It is the policy of the Council to require that all Planning applications for medium and high density development utilise the 'Green City Guidelines' (UCD Urban Institute Ireland 2008) to effectively retain and incorporate biodiversity into development proposal.</p> <p>Insert new SLO: The areas of flooding potential as indicated in the Dodder Catchment Flood Risk Assessment Management Study (CFRAMS) and the OPW "alluvial soils" floodplain maps are to be taken into account along with the requirements of Section 5 of The Planning System and Flood Risk Management Guidelines (November 2009) when assessing planning applications, with a view to restricting or, if necessary, refusing development proposals within such areas in order to avoid flooding events.</p>
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Local Zoning Objectives	
LZO 2. Primrose Hill, Lucan- Sheltered Accommodation	Recommendation Amend wording of LZO 2. Primrose Hill, Lucan- Sheltered Housing to read; Facilitate the provision of sheltered housing in conjunction with a nursing home through development which has regard to the amenity and heritage importance of Primrose Hill House, a protected structure, and its gardens.
New LZO Spawell, Templeogue- Mixed- Use Redevelopment	Recommendation Insert new LZO. Spawell, Templeogue- Mixed Use Redevelopment <i>“Facilitate redevelopment of the Spawell Sports and Leisure Centre, Wellington Lane, Templeogue, for commercial, leisure, health, well-being, education and recreational purposes. An acceptable development proposal would include a sports centre incorporating indoor and outdoor sports facilities, and complementary mixed uses including an ancillary hotel of 200 bedrooms with conference facilities and integral staff accommodation, a nursing home, primary healthcare and step-down healthcare facilities or other similar scheme. Any development on the lands to be carefully designed to a scale and height appropriate to its proximity to the Green Belt.”</i>
LZO 4. Grange Castle Golf Course- Development	Recommendation Insert the following text at end of LZO 4: <i>‘The Department of Defence shall be consulted in relation to any proposed developments.’</i>
Specific Local Objectives	
New SLO- Floodplains	Recommendation Floodplain SLO to be indicated on Development Plan Maps located alongside the potential flooding areas; SLO: <i>The areas of flooding potential as indicated in the Dodder Catchment Flood Risk Assessment Management Study (CFRAMS) and the OPW “alluvial soils” floodplain maps are to be taken into account along with the requirements of Section 5 of The Planning System and Flood Risk Management Guidelines (November 2009) when assessing planning applications, with a view to restricting or, if necessary, refusing development proposals within such areas in order to avoid flooding events.</i>
SLO7 Lucan- Lighting of Key Buildings	Recommendation Insert additional text to SLO7 Lucan- Lighting of Key Buildings as follows; The design of any proposed future lighting of the Liffey Bridge shall be subject to assessment of the impact of such lighting on bat roosting, hunting and movements.
SLO 23. Griffeen Valley park- Biodiversity	Recommendation Add the following text to SLO 23: <i>‘Any such works in this area should be subject to consultation with the Department of Defence, due to the possibility</i>

	<i>of waterfowl posing a threat to air safety at Casement Aerodrome'.</i>
New SLO- Grand Canal- Hazelhatch	Recommendation Insert new SLO Grand Canal- Hazelhatch Facilitate the development of the Grand Canal at Hazelhatch as a location for water based activities and walking trails between Dublin and Kildare subject to the approval of Waterways Ireland and the development of a sustainable strategy for the Grand Canal as set out in SLO 6. River Liffey and grand Canal- Strategy.
Specific Local Objective No. 38: Corkagh Park	Recommendation Insert the following text at end of SLO 38: <i>'Any work in this area, such as provision of lakes/water features or development likely to cause pooling of water, which may pose an attractant for waterfowl and therefore might in turn pose a threat to air safety at Casement Aerodrome, should be subject to consultation with the Department of Defence'.</i>
Specific Local Objective No. 44: Greenogue – Completion of New Road:	Recommendation Insert the following text at end of SLO 44: <i>'The Department of Defence shall be consulted in relation to this development'.</i>
New SLO Monastery Road, Clondalkin	Recommendation Insert SLO reflecting that a development brief approved by the elected members applies to these lands, subject to the policies contained in the living place.
SLO 52. Balrothery Estate- Residential Development	Recommendation SLO 52. Balrothery Estate- Residential Development to be reworded to read; SLO 52. Balrothery Estate- Density Ensure the density of any future developments on the private lands at the south west side of Balrothery Estate (two cottages) shall be limited to the density already in Balrothery.
SLO68 Ballycullen/Stocking Lane Distributor Road	Recommendation Delete SLO68
New SLO- Rockbrook Park School – Educational Facilities	Recommendation Insert new SLO: Rockbrook Park School- Educational Facilities; "Facilitate the sustainable development and expansion of educational/community facilities on the lands at Rockbrook Park School while taking cognisance of the importance of the biodiversity and existing environment at this location."
SLO 72Tallaght- Public Golf Course	Recommendation Add the following text to SLO 72: <i>'The Department of Defence shall be consulted in relation to any such proposals'.</i>

<p>New SLO- Marlay Grange House</p>	<p>Recommendation Insert SLO; Marlay Grange House: To facilitate the sensitive development of the lands adjoining Marlay Grange House, to the south of Grange Road in Rathfarnham, for high quality (not more than 2 houses to the acre) low density residential development having regard to: • Protection of the integrity of the protected structure and its curtilage • Protection of existing mature trees and subject to detailed Arborist assessment • Protection of the amenity of the overall setting, shelter development from road and visual impact of adjoining park and amenities • Subject to necessary infrastructure upgrades for piped services.</p>
<p>Schedules</p>	
<p>Schedule 3</p>	
	<p>Recommendation The following definition should be added to Schedule 3: "This category includes smaller shops giving a localised service in a range of retail trades or businesses such as sweets, groceries, tobacconist, newspapers, hairdresser, undertaker, ticket agency, dry cleaning and laundry depots and designed to cater for normal 'neighbourhood requirements'.</p>
<p>Schedule 4</p>	
	<p>Recommendation Schedule 4, page 264, third paragraph: Delete the following text: <i>'The Department of Defence requires that no new building or developments including car parks, workshops, hay barns, etc. be permitted on lands lying under the runway approach surfaces at Casement Aerodrome, for a distance of 1,350 metres (4,430 feet) outwards from the future thresholds of the runways. However, Council policy reduces this distance for runway 05 (Rathcoole end and runway 23 (Corkagh Park end) to that shown on Development Plan maps i.e. 1,100 metres (3,610 feet).'</i></p> <p>Insert the following replacement text: <i>'In the document 'Review of Policy at Casement Aerodrome, Baldonnell, Co. Dublin' (January 2009), Public Safety Zones have been introduced within the existing 'red zones'. No development whatsoever is permitted within the Public Safety Zones. However, within the 'red zones', some development is permissible whereby the development could not reasonably expect to increase the number of people working or congregating in or at the property. This may include development such as the extension of an existing dwelling or a change of building use. New developments with a high intensity of use would continue to be prohibited and height restrictions would continue to apply to developments in the environs of the Aerodrome. However, Council policy reduces the distance within which no development is allowed on lands lying under the runway approach surfaces, for runway 05 (Rathcoole end) and</i></p>

	<p><i>runway 23 (Corkagh Park end), to that shown on Development Plan maps i.e. 1,100 metres (3,610 feet)'. </i></p> <p>NOTE: Detailed information is required from the Department of Defence in order to establish if the distance referred to above is within or outside the Public Safety Zone this will be confirmed prior to any meeting of the Council'.</p> <p>Schedule 4, page 265, fifth paragraph: Delete the following text: <i>'For that reason, it is policy that no new buildings or developments including workshops, haybarns, etc. be permitted on lands lying under the runway approach surfaces at Casement Aerodrome, for a distance of 1,350 metres (4,430) feet outwards from the future thresholds of runways 11/29 and 1,100 metres (3,610 feet) from runways 05/23. These approach areas are shown on the Development Plan Maps (Please see Explanatory Note to this Schedule)'. </i></p> <p>Insert the following replacement text: <i>'In the document 'Review of Policy at Casement Aerodrome, Baldonnell, Co. Dublin' (January 2009), Public Safety Zones have been introduced within the existing 'red zones'. No development whatsoever is permitted within the Public Safety Zones. However, within the 'red zones', some development is permissible whereby the development could not reasonably expect to increase the number of people working or congregating in or at the property. This may include development such as the extension of an existing dwelling or a change of building use. However new developments with a high intensity of use would continue to be prohibited. Height restrictions would continue to apply to developments in the environs of the Aerodrome.'</i></p>
	<p>Recommendation Paragraph 1, Page 265 – delete the following text: <i>'...and runway 05/23 is a Code 3 visual approach runway, with provision being made for possible upgrading to instrument status'</i> and replace with the following text: <i>'Runway 23 is a Code 3 instrument runway and has two instrument approaches associated with it'.</i></p>
	<p>Recommendation Paragraph 2, pg265, amend 5th sentence to read as follows: <i>'The inner horizontal surface is an obstacle limitation surface extending to 4km (in all directions) from the centreline of the runway (or runway strip) at an elevation of 45m above the threshold altitude of Runway 11'.</i></p>
	<p>Recommendation Paragraph 3, Page 266; amend last line to read <i>'...which can only be identified by the Air Corps Communications and Information Service'.</i></p>

	<p>Recommendation Paragraph 5, page 266; replace 'should' with 'shall' so that sentence reads 'The County Council shall also make known the locations of any proposed landfill or civic amenity facilities'.</p>
	<p>Recommendation Paragraph 8, page 266; replace 'should' with 'shall' so that sentence reads 'The local Planning Authority shall consult the Department of Defence about any proposal to build a new road...'</p>
	<p>Recommendation Insert the following before the last paragraph on page 267: 'The Department of Defence shall be consulted on any proposed development, which by its nature, is likely to increase air traffic in the</p>
	<p>Recommendation Insert new paragraph 4, Page 267, as follows: 'Temporary structures, including mobile cranes which are likely to penetrate the ICAO surfaces established at Casement must be notified to and meet any requirements set down by the Department of Defence. Where the Council grants planning permissions to developments underlying such surfaces, it shall attach a note requiring that the applicant notify the Department of Defence of plans to erect cranes likely to penetrate the applicable ICAO surfaces and meet any requirements set down by the Department of Defence'.</p>
Schedule 5	<p>Recommendation Schedule 5: Delete first paragraph and insert the following replacement text: 'This safeguarding policy must be read in conjunction with Drawing 'Safeguarding Map for Weston Aerodrome' (to a scale of 1/10560) prepared by GPS Surveying Ltd. of Newmarket House, Co. Cork, dated 10 January 2003. This aerodrome safeguarding map has been lodged by Weston Aerodrome with South Dublin County Council in pursuance of a direction issued by the Irish Aviation Authority (NR T.02 Issue 4 Date 02.09.04 – Aerodrome Safeguarding Maps) in [pursuance of Articles 8 and 23 of the Irish Aviation Authority (Aerodromes and Visual Aids) Order, 2000, (S.I. No. 334 of 2000). Details from this drawing are reproduced on the Development Plan Index Map'.</p> <p>Schedule 5: 'NOTE' – Delete text 'drawing no. EDAX 9702/CO9' and insert replacement text as follows: 'Drawing 'Safeguarding Map for Weston Aerodrome' dated 10 January 2003'.</p> <p>Schedule 5: In section headed 'Noise', delete text 'Drawing No. EDAX 9702/CO9' and insert replacement text 'Drawing 'Safeguarding Map for Weston Aerodrome' dated 10 January 2003'.</p>
Land Use Zoning	

Map 1	<p>Recommendation The lands be zoned 'F' Open Space- reflecting the existing zoning on site. Location; Lands at Somerton House, Lucan</p>
Map 1	<p>Recommendation The lands be zoned 'F' Open space- reflecting the current zoning on the site. Location; St Helen's House and grounds on Tandy's Lane</p>
Map 3	<p>Recommendation Include additional wording in SLO 36 and 58 to stating a requirement for flood risk assessment in accordance with 'Planning System and Flood Risk Management Guidelines 2009'.</p>
Map 4	<p>Recommendation Rezone from F to A Existing Zoning: F Proposed Zoning: A Location Description: Lands located between 56 Forest Close and Forest Lodge, Kingswood Heights Area(Ha): 0.08</p>
Map 4	<p>Recommendation It is recommended to rezone block of land along Airton Road which fronts onto the Belgard Road. Existing Zoning: EP2 Enterprise Priority Two Zoned Lands Proposed Zoning: EP1 Enterprise Priority One Zoned Lands</p>
Map 4	<p>Recommendation It is recommended to rezone block of land along Airton Road which fronts onto the Belgard Road. Existing Zoning: EP2 Enterprise Priority Two Zoned Lands Proposed Zoning: EP1 Enterprise Priority One Zoned Lands Location Description: Jacob Factory Site, Belgard Road, Tallaght Area(Ha): 7.83</p>
Map 4	<p>Recommendation It is recommended to rezone block of land which fronting onto the eastern side Belgard Road from the TC zoning north to Mayberry Road, no deeper than the width of the 'Jacobs' site. Existing Zoning: EP2 Enterprise Priority Two Zoned Lands Proposed Zoning: EP1 Enterprise Priority One Zoned Lands Location Description: Jacob Factory Site, Belgard Road, Tallaght Area(Ha): 7.83</p>
Map 4	<p>Recommendation</p>

	<p>Areas with established residential development to be zoned 'A'</p> <p>Existing Zoning: LC</p> <p>Proposed Zoning: A</p> <p>Location Description: Kingswood Village</p>
Map 4	<p>Recommendation</p> <p>It is recommended that an additional LZO be placed on these lands requiring the preparation of a framework plan to promote enterprise and employment uses taking account of new public transport opportunities.</p> <p>Existing Zoning: EP2 Enterprise Priority Two Zoned Lands</p> <p>Proposed Zoning: A1</p> <p>Location Description: Lands at Fortunestown Way</p> <p>Area(Ha): 27.8</p>
Map 4	<p>Recommendation</p> <p>Location: Jacob's Site, Belgard Road</p> <p>It is recommended that these lands be zoned EP1.</p>