



South Dublin County Council

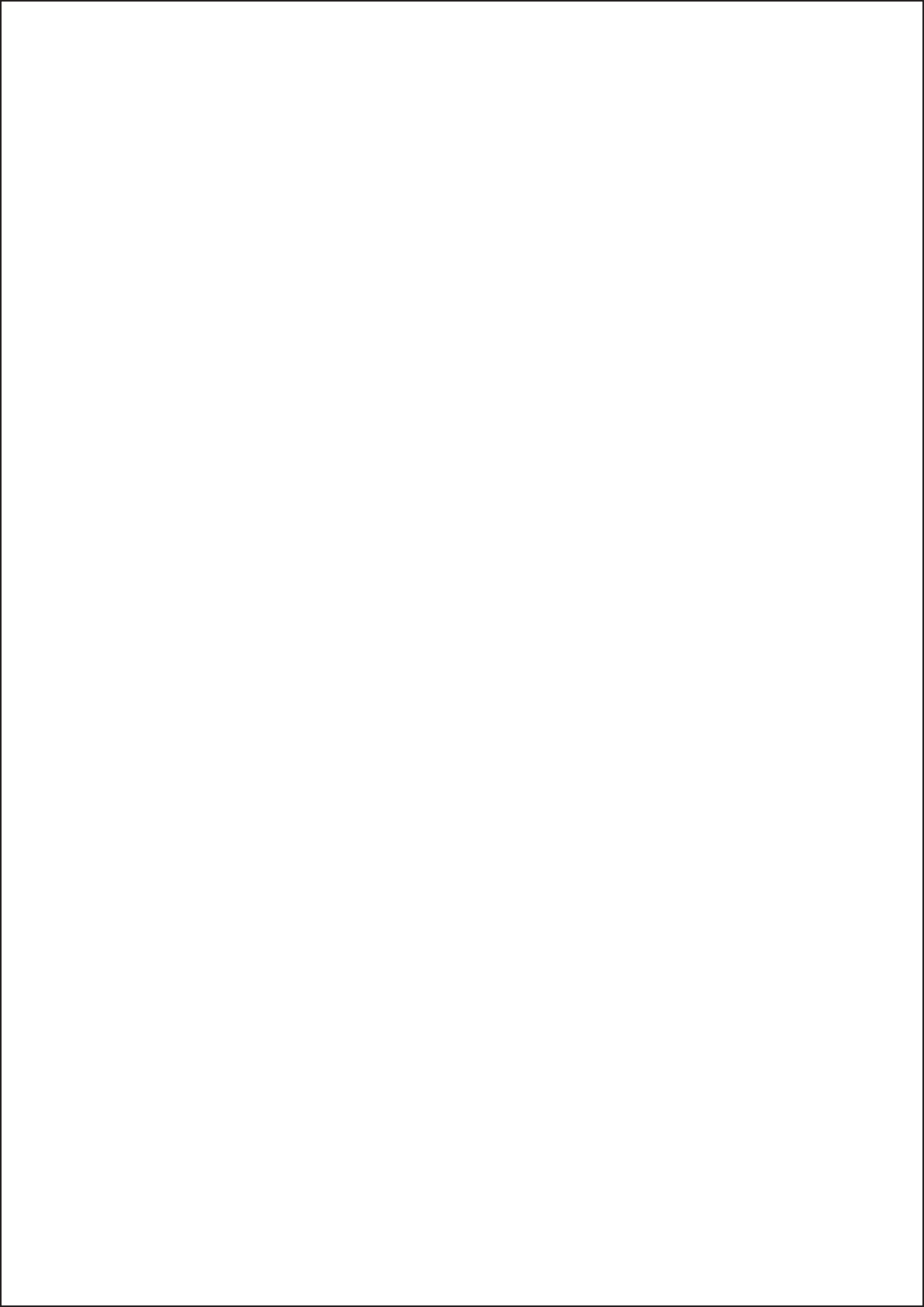
Draft Development Plan  
2010 - 2016



**South Dublin County Council  
Report of County Manager on  
Submissions received on  
Amended Draft Development Plan**

**July 2010**





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# **PART ONE NEXT STEPS AND PUBLIC CONSULTATION PROCESS**

## 1. INTRODUCTION

### 1.1 Purpose and Contents of Report

1.1.2 The purpose of this document is to report on the outcome of the consultation process carried out in relation to the proposed Amendments to the Draft South Dublin County Development Plan 2010-2016.

1.1.3 The report forms part of the statutory procedure for the preparation of a new County Development Plan.

1.1.4 **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 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 that made submissions/observations on the proposed Amendments to the Draft County Development Plan.

1.1.5 **PART 2** consists of an analysis and summary 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 as part of this section. Part 2 also includes the Environmental Reports.

1.1.6 The issues are analysed and summarised under the theme and chapter headings of the Draft County Development Plan as follows;

#### **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**

#### **Mapping**

1.1.7 **PART 3** consists of the list of Prescribed Bodies consulted, summaries of the main issues raised in the submissions received, and recommended changes to the Draft County Development Plan.

1.1.8 This report is submitted to Council Members for their consideration.

## **1.2 Planning and Development Act, 2000**

1.2.1 Section 12 (7)(a) of the Planning and Development Act, 2000, as amended, requires the planning authority to publish notice of the proposed amendment in at least one newspaper circulating in its area.

1.2.2 Not later than 8 weeks after giving notice the manager of a planning authority shall prepare a report on any submissions or observations received under that subsection and submit the report to the members of the authority for their consideration.

(b) A report under paragraph (a) shall—

(i) list the persons or bodies who made submissions or observations under this section,

(ii) summarise the issues raised by the persons or bodies in the submissions,

(iii) give the response of the manager to the issues raised, taking account of the directions of the members of the authority or the committee under section 11 (4), the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.

## **1.3 Manager's Report**

1.3.1 Another feature of the Planning and Development Acts is the requirement on 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 Proposed Amendments to 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.

## **1.4 Consultation and Submissions**

1.4.1 Fifty Six formal planning submissions were received during the consultation period. The opinions, views and ideas set out in the written submissions largely related to the Proposed Amendments to the Draft Plan. The Council wishes to express its appreciation to those who made submissions.

## 2.0 LEGISLATIVE BACKGROUND AND REQUIREMENTS

2.1 Section 12 (8) (a) of the Planning and Development Act, 2000, sets out the requirements in relation to the preparation of a Manager's report for this stage. The Manager's report is required to deal with any submissions or observations received on foot of the notifications and consultations, with, *inter alia*, the public, prescribed bodies, service providers and the Board. The report must be prepared not later than eight weeks after giving notice of the Proposed Amendments to the Draft Development Plan.

2.1.1 The Manager's report must :-

**List** the persons or bodies who made submissions or observations,

**Summarise** the issues raised by the persons or bodies in the submissions

Give the **response** of the Manager to the issues raised. In this regard the Manager's opinion must take into account (a) directions of the members of the authority, (b) the proper planning and sustainable development of the area, (c) the statutory obligations of any local authority in the area, and (d) any relevant policies or objectives of the Government or of any Minister of the Government.

2.1.2 The Manager's report must then be submitted to the Members of the Planning Authority or a committee of the Planning Authority for their consideration.

2.1.3 Members shall consider the amendments and this report not later than 6 weeks after the submission of the manager's report to the members of the authority.

2.1.4 The members of the authority shall then, by resolution, having considered the amendment and the manager's report, make the plan with or without the proposed amendment, except that where they decide to accept the amendment they may do so subject to any modifications to the amendment as they consider appropriate.

## 3.0 NEXT STEPS

### 3.1 Consideration by Council Members

3.1.1 Members have six weeks within which to consider the Manager's report. As stated above, having considered the amendment and the manager's report, make the plan with or without the proposed amendment, except that where they decide to accept the amendment they may do so subject to any modifications to the amendment as they consider appropriate.



## **4.0 PUBLIC CONSULTATION ON PROPOSED AMENDMENTS TO THE DRAFT PLAN**

### **4.1 Description of Notification Procedure / Consultation Process**

- 4.1.1 The public consultation stage ran from 3<sup>rd</sup> June 2010 to 2<sup>nd</sup> July 2010. The consultation process comprised of the following elements:- (a) newspaper advertisements inviting written submissions on Proposed Amendments; (b) public information days; and (c) letters to, and contact with, prescribed bodies, service providers and others requesting their submissions on the proposed amendments.
- 4.1.2 The proposed amendments to the written statement (incl errata sheet) and maps of the Draft County Development Plan 2010-2016, the accompanying Environmental Report and Appropriate Assessment on the likely significant effects on the environment of implementing the proposed amendments were on display in all County libraries, civic offices in Clondalkin and County Hall Tallaght.
- 4.1.3 These documents were also placed on a dedicated section of the Council website, which allowed for the making of submissions directly through the internet.
- 4.1.4 Council planning staff was available on Wednesday 9<sup>th</sup> June 2010 between 2-4.30pm at the council offices in Clondalkin and Wednesday 16<sup>th</sup>, 23<sup>rd</sup> and 30<sup>th</sup> June 2010 at County Hall, Tallaght to answer questions and to assist in making a submission.

### **4.3 Written submissions**

- 4.1.5 Fifty Six submissions were received, the majority of which related to the proposed amendments. A list of those who made submissions is contained in part two of this report.
- 4.1.6 An analysis of the submissions was carried out which involved reading and summarising every submission and extracting and categorising 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.
- 4.1.7 Three hundred and thirty nine issues were raised, of these, twenty one were deemed invalid, as they did not relate to a proposed amendment. The majority of issues raised were in relation to Landscape, Natural Heritage and Amenities, Enterprise and Employment and Environmental Services
- 4.1.8 In the following section, a detailed analysis of the submissions is carried out. This includes summaries of issues raised as they relate to the proposed amendments, the response of the Manager and recommendations on whether or not any changes to these proposed amendments should be made.

- 4.1.9 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
- 4.1.10 Recommendations for change to the proposed amendments are made in the context of submissions received.

<b>4.4 List of Persons/Bodies who Made Written Submissions</b>		
<b>Ref</b>	<b>Company</b>	<b>Name</b>
<a href="#">Amend0001</a>		John O'Leary
<a href="#">Amend0002</a>	Department of Defence	David Byrne
<a href="#">Amend0003</a>	Kildare County Council	John Coppinger
<a href="#">Amend0004</a>		David Nolan
<a href="#">Amend0005</a>	Citywest	Hugh Lynn
<a href="#">Amend0006</a>	Citywest	Hugh Lynn
<a href="#">Amend0007</a>		David Nolan
<a href="#">Amend0008</a>		David Nolan
<a href="#">Amend0009</a>	Combined Action on Weston Aerodrome	Margaret Donnelly
<a href="#">Amend0010</a>	Weston Park Residents Association	Liam Brehon
<a href="#">Amend0011</a>		John Spain Associates
<a href="#">Amend0012</a>		Con McCarthy
<a href="#">Amend0013</a>		Liona O'Toole
<a href="#">Amend0014</a>		Tara De Buitlear
<a href="#">Amend0015</a>	St. Thomas National School Parents Association	Liona O'Toole
<a href="#">Amend0016</a>	Gaelscoil Naomh Padraig	Brian O'Fiach
<a href="#">Amend0017</a>	on behalf of Bohernabreena/Glenasmole/Ballinascorney Res. Assoc	Michael Dicker
<a href="#">Amend0018</a>	Wind Energy Direct	Noreen Stack
<a href="#">Amend0019</a>	Department of Education and Skills	Department of Education and Skills c/o Shirley Kearney
<a href="#">Amend0020</a>		John Healy
<a href="#">Amend0021</a>	Greenstar Holdings Ltd	Patrick Sheehan
<a href="#">Amend0022</a>	Johnny Janssens	Eamon Kelly RPS Group
<a href="#">Amend0023</a>	National Roads Authority	Raymond Foley
<a href="#">Amend0024</a>	Vodafone	Aine Ryan
<a href="#">Amend0025</a>	on behalf of The Quality Bus Network	Aidan Gallagher
<a href="#">Amend0026</a>	on behalf of South Dublin Conservation Society	Padraig Mac Oitir
<a href="#">Amend0027</a>	on behalf of TRCU	Gerard Stockil
<a href="#">Amend0028</a>	on behalf of Rathcoole Community Council	Deborah Collins
<a href="#">Amend0029</a>		Kathleen Jacobi
<a href="#">Amend0030</a>	on behalf of Resource Property Investment Fund	Dave Coakley
<a href="#">Amend0031</a>	on behalf of Keep Ireland Open	Roger Garland
<a href="#">Amend0032</a>	on behalf of Liffey Valley Park Alliance	The Byrnes
<a href="#">Amend0033</a>		Fig Ireland
<a href="#">Amend0034</a>	on behalf of Cellular Industry Assoc.	Tommy Mc Cabe
<a href="#">Amend0035</a>	on behalf of E.P.A.	Cian O' Mahony
<a href="#">Amend0036</a>	on behalf of ESB	Sarah Waddell
<a href="#">Amend0037</a>	on behalf of Dasnoc Ltd	Trevor Saddler
<a href="#">Amend0038</a>	on behalf of ESB	Sara Byrne

<b>4.4 List of Persons/Bodies who Made Written Submissions</b>		
<b>Ref</b>	<b>Company</b>	<b>Name</b>
<a href="#">Amend0039</a>	Wellington Partners - owners of Spawell	Sadhbh Duffy of Tom Phillips & Assoc.
<a href="#">Amend0040</a>	NRA	Raymond Foley
<a href="#">Amend0041</a>	National Transport Authority	Owen Shinkwin
<a href="#">Amend0042</a>	on behalf of the Minister for the Environment, Heritage & Local Govern.	Nora Keneghan
<a href="#">Amend0043</a>	on behalf of the Board of Management, St. Thomas' Jnr National School	Michael Maher
<a href="#">Amend0044</a>	Tesco Ireland Ltd	Darragh Mc Gonigle on behalf of GVA Planning & Registration Ltd
<a href="#">Amend0045</a>		John Power
<a href="#">Amend0046</a>	on behalf of the Royal Institute of Architects Ireland	Joe Miller
<a href="#">Amend0047</a>	on behalf of Weston Airport	Joe Bonner
<a href="#">Amend0048</a>	on behalf of Barkhill Ltd	Joe Bonner
<a href="#">Amend0049</a>	An Taisce	Ian Lumley
<a href="#">Amend0050</a>	on behalf of Electrolux (Ireland) Limited	Conor Sheehan
<a href="#">Amend0051</a>	on behalf of Storeford Limited	Conor Sheehan
<a href="#">Amend0052</a>	SIAC (Clondalkin) Ltd.	Garrett Robinson
<a href="#">Amend0053</a>	SIAC BBP West Ltd.	Garrett Robinson
<a href="#">Amend0054</a>	SIAC Baldonnell Ltd.	Garrett Robinson
<a href="#">Amend0055</a>	An Garda Siochana	M.B. Mangan PA to Garda Commissioner
<a href="#">Amend0056</a>	South Dublin Chamber & Ronsin Ltd.	Peter Byrne

#### 4.4 List of Prescribed Bodies Consulted

Pat Carey T.D	Minister for Community Equality & Gaeltacht Affairs
Mary Hanafin T.D.	Minister of Tourism, Culture & Sport
Tony Killeen T.D.	Minister of Defence
Mary Coughlan T.D.	Tanaiste & Minister for Education & Skills
Batt O'Keeffe, T.D.	Minister for Enterprise, Trade and Innovation
Noel Dempsey T.D.	Minister for Transport
	National Transport Authority
	Quality Bus Network Office
Spatial Policy Section	Department of Environment, Heritage and Local Government
	ESB Head Office
	South Western Area Health Service Executive
	The National Authority for Occupational Safety & Health
	Wicklow County Council
	Dun Laoghaire Rathdown County Council
	Dublin City Council
	Dublin Regional Authority
	South East Regional Authority
	Border Midland & Western Regional Assembly
Eamon O'Cuiv T.D	Minister for Community Rural & Gaeltacht Affairs
Development Applications Unit	Department of the Environment, Heritage & Local Government
	An Bord Pleanála

Martin Cullen T.D.	Minister of Arts, Sports & Tourism
Eamon Ryan T.D.	Minister for Communications, Energy and Natural Resources
Mary Harney T.D.	Minister for Health and Children
Brendan Smith T.D	Minister for Agriculture, Fisheries and Food
	Aer Rianta
	Eastern Regional Fisheries Board
	The Central Fisheries Board
	Office of Public Works
	National Roads Authority
	Environmental Protection Agency
	Forfás
	The Heritage Council
	An Taisce - The National Trust for Ireland
	The Arts Council
	Irish Rail
	The County Development Board
	IDA Ireland
	Fingal County Council
	Kildare County Council
	Mid East Regional Authority
	Midland Regional Authority
	Southern & Eastern Regional Assembly
	Fás
	Sustainable Energy Ireland
	The Commission for Energy Regulation
	Dublin Bus

Personal Assistant to Commissioner	Garda Headquarters
	Irish Aviation Authority
	Commission for Communications Regulations
Planning Section	Department of Education
	Bord Gáis Eireann
	Health Service Executive
Mr. M. Lally, HEO	Department of Defence
	The Library Council
Property Planning Manager	ESB Head Office
The Library	University of Limerick
	Trinity College Library
Patrick Leonard	An Taisce, South Co. Dublin Assoc
Architectural Library	UCD
	Bord Failte Eireann
Spatial Policy Section,	Department of Environment, Heritage and Local Government
	Railway Procurement Agency
	Health and Safety Authority
John Gormely T.D	Minister for Environment, Heritage and Local Government

## PART TWO OVERVIEW OF ISSUES RAISED IN SUBMISSIONS



## INTRODUCTION AND CORE STRATEGY

Proposed Amendment Ref.	Sub No	Manager's Response and Recommendations
<p><b>PA001</b></p> <p>Support this amendment.</p>	<p>Amend0031</p>	<p><b>Manager's Response</b></p> <p>Comment Noted.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>PA002</b></p> <p>The Population Targets for Local Authorities as reproduced from the Draft Regional Planning Guidelines for the Greater Dublin Area 2010-2022 are patently out of date and no basis on which to plan for the next 6 years.</p> <p>Comment in relation to population projections. Underlying population projections seem to have been informed by the 2006 census and are now significantly out of date given the effect of the current economic crisis on population- DRPG's figures are widely overstated.</p> <p>In response to the additional information added to Section 0.2 of the plan it is requested that, in the interest of clarity and demonstrating consistency with the Regional Planning Guidelines for the Greater Dublin area, a table is compiled and included which includes the following information : a) a detailed breakdown of the location and distribution of the 627 hectares of zoned lands within the context of the locations/settlements outlined in the County Settlement Hierarchy as outlined in Section 3.3 of the draft plan: b) the locations of housing development lands to be prioritised for development over the period of the plan across each of the locations / settlements above in line with the Housing Land</p>	<p>Amend0049 Amend0032 Amend0042 Amend0033 Amend0041</p>	<p><b>Manager's Response</b></p> <p>A Planning Authority is required to have regard to any regional planning guidelines in force for its area when making and adopting a Development Plan. The proposed amendment to the Draft Plan sets out the regional population figures for the Greater Dublin Area for the period 2010-2022 as contained within the adopted Regional Planning Guidelines.</p> <p>It is incumbent on the Development Plan to make necessary provision for the population targets as set out in this amendment. Based on a review of the capacity of existing zoned land, as set out in the previous manager's report there is capacity for approximately 35,000 dwelling units in the County. The submission from the Department of Environment Heritage and Local Government recommends that a further table be inserted into the Development Plan clarifying the location of zoned land available for residential development, including overall capacity of these lands. It is considered that this is appropriate and it is recommended that such a table be inserted into the core strategy clarifying the overall figures already contained therein.</p> <p>Having considered the Regional Planning Guideline figures, it is the view of the manager that there are sufficient lands already zoned and appropriately located, particularly along the main Cork-Dublin rail line to meet our obligations up to 2016 and to allow for headroom, choice and for a clear direction to be given to the accommodation of the medium term</p>

<p>Requirement for South Dublin as set down in the Regional Planning Guidelines; c) the allocation of housing units in all locations/settlements above in line with the Housing Land Requirement for South Dublin as set down in the Regional Planning Guidelines; d) the development capacity of housing development lands and planned capacity increases during the plan period. The table should be accompanied by a statement outlining how the data and details therein will be re-evaluated in the light of any new or revised local area plans.</p> <p>Seeks clarification on the population projections claiming that the overestimation will result in over-specifications of infrastructural development requirements and zoning requirements.</p> <p>NTA notes that the population targets of the RPGs 2010-2022 would now be included. The legacy of zoned residential land in peripherally located areas on the western and southern fringes of the County has the potential to undermine the Draft Plans emphasis on consolidation. Phasing is required to ensure that population and employment growth is focused in the first instance on higher order urban centres and the catchment areas of public transport and other services required at the local level. It is especially important that consolidation occurs if there is a reduction in the rate of population growth below that currently targeted. It is recommended that the draft plan reflect the significant constraints in providing public transport to rural and peri-urban areas- the Development Plan should specify criteria to guide the phasing of zoned development land related to relative levels of accessibility by public transport, walking and cycling, and proximity to local services. The Draft Plan should highlight this as among the key reasons for the need to control development in rural areas, and for focussing growth into higher order centres, facilitating the development of a</p>		<p>population projected.</p> <p><b>Manager's Recommendation</b>                  In the interests of clarity insert table into core strategy indicating the overall disposition of zoned lands capable of accommodating residential development and their overall capacity based on the already stated figures of land availability and overall capacity.</p>
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<p>critical mass that can support the viability of providing effective public transport. There should be a presumption against any further zoning in peripheral areas and phasing of development of existing zoned lands - phasing should focus on the consolidation of existing urban based areas on the hierarchy of urban centres, and development should be phased to reflect the delivery of and deliverability of public transport. This sequential approach should be incorporated in to the core strategy.</p>		
<p><b>PA003</b></p> <p>Educational accommodation requirements in the South Dublin Area are being considered by the Department of Education, in relation to population growth and school planning.</p> <p>Welcomes statement regarding no new zoning but its inclusion and acceptance warrants consideration of the need for and merit of de-zoning – an option which seems to have been ignored by the Council.</p> <p>Requests consideration of de-zoning on basis that the plan has sufficient lands to accommodate its regional population share.</p>	<p>Amend0019 Amend0049</p>	<p><b>Manager's Response</b></p> <p>Comments in relation to education noted. There is sufficient land zoned in the County and it is not considered reasonable to de-zone lands considering outstanding grants of permission on lands in the County and the core strategy of the Plan.</p> <p><b>Manager's Recommendation</b></p> <p>No change recommended.</p>
<p><b>PA005</b></p> <p>The RIAI believes that the expansion of this core strategy is welcomed but it is important that specific polices and development control standards are included to make the strategy a reality.</p> <p>The Council is merely using the requirement to ameliorate the effects of climate change to justify its own priorities for the</p>	<p>Amend0046 Amend0049</p>	<p><b>Manager's Response</b></p> <p>With respect to the proposed amendment it is considered that reference to particular date for publication of the National Climate change adaptation framework should be omitted. It is recommended that the final sentence of the amendment to read ' The Council notes the National Climate Change Adaptation Framework will provide a basis for the integration of adaptation considerations into decision making at national and local level.'</p>

<p>expansion of retail and the furtherance of high density development. Apart from the move away from incineration, there is little in the plan that demonstrates a commitment to ameliorate the effects of climate change.</p>		<p><b>Manager's Recommendation</b> Final sentence of the amendment to read ' The Council notes the National Climate Change Adaptation Framework will provide a basis for the integration of adaptation considerations into decision making at national and local level.'</p>
<p><b>PA006</b>  Support this amendment.</p>	<p>Amend0031</p>	<p><b>Manager's Response</b>  Comment noted.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>PA007</b>  Support this amendment</p>	<p>Amend0031</p>	<p><b>Manager's Response</b>  Comment noted.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>PA008</b>  Reference should be made to the EU Flood Directive and the DoEHLG Flood Risk Management Guidelines.  Referred to the responsibilities and obligations and responsibilities in accordance with all national and EU environmental legislation and to ensure that SDCC, when undertaking and fulfilling its statutory obligations is at all times compliant with the requirements of national and EU</p>	<p>Amend0035</p>	<p><b>Manager's Response</b>  It is considered that this issue is adequately dealt with under section 2.3.21 Risk of Flooding and that section 0.3.22 adequately addresses the Environmental Policy Context and recognises the statutory obligations attached to such.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>

environmental legislation.		
<p><b>PA012</b></p> <p>Amendment sought to require that all approved local plans be statutory plans to ensure clarity about the status, adoption process and timeframe of plans, for all parties or, in the alternative, to have a clearly defined 'best before date'.</p> <p>Seeks clarification on the use of the term 'local plan' because 'Local Area Plan' has a distinct meaning in planning legislation whereas the former does not.</p>	<p>Amend0051 Amend0050</p>	<p><b>Manager's Response</b></p> <p>It is considered reasonable that a planning authority has different means available to create a structured view of the future land use within the County. It is not considered necessary to engage in the full complexities and timescales involved in a Local Area Plan for all developments in the County.</p> <p>The proposed amendment is clear in its intent in relation to the types of plans which shall be considered or utilised where required and the manner in which this will be decided.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>PA013</b></p> <p>There appears to be a number of typographical errors in the column with some boxes empty and others containing two zonings.</p> <p>Welcome the recognition of the Liffey Valley as an entity and new zoning designation.</p> <p>Serious typographical and formatting errors in the table detailing the zoning matrix for the Liffey Valley Zoning- needs to be corrected and also where it features in the Environmental Report.</p> <p>Seeks clarification on the zoning objectives matrix in relation to the land uses within the new Liffey Valley Zoning.</p> <p>Consideration should be given to amending new objective 'I' to include reference to protect biodiversity of the Liffey Valley.</p>	<p>Amend0049 Amend0032 Amend0033 Amend0035</p>	<p><b>Manager's Response</b></p> <p>What may appear as typographical errors in relation to the new 'I' zoning objective are the amendments to the plan as agreed by Members at Council Meetings in May 2010.</p> <p>The main issues surrounding the Zoning Matrix and land uses related to Objective 'I' include Aerodrome/Airfield, Concrete/Asphalt Plant in or adjacent to a Quarry, Hotel/Motel and Public House. It is considered that Aerodrome/Airfield and Concrete/Asphalt Plant in or adjacent to a Quarry should be Open for Consideration. Given that the box was not indicated, the use would be considered in conjunction with general policies of the plan and the zoning objectives for the area a restriction of these uses would, in the view of the manager, constitute a material alteration of the proposed amendment.</p> <p>As the Hotel/Motel and Public House were both open for consideration (in existing premises) and not permitted, it is considered that they should be open for consideration (in existing premises). Both of these indicators went on display. To indicate these as not permitted would be unreasonable as it would lead to a material change and restrict</p>

		<p>development further than those being open for consideration in existing premises.</p> <p>At the meetings in May 2010, the Council Members were advised that the introduction of another zoning would add further complexity to the Development Plan without any real effective increase in protection to already highly protected lands. This remains the strong advice of the Manager. Furthermore the attendant changes to the Draft plan on foot of those motions could result in a series of unintended consequences to the Plan.</p> <p>The lands proposed to be zoned 'I' are currently designated High Amenity to which Zoning Objective 'G' relates. Zoning Objective 'G' almost entirely comprises the lands adjoining the Liffey and Dodder Rivers. This zoning designation has been in effect for most of the period since the enactment of the 1963 Planning and Development Act. The effect of the proposed amendment would be to create a new zoning designation covering substantially the lands currently zoned 'G', which is considered unnecessary.</p> <p><b>Manager's Recommendation</b> It is recommended that the Liffey Valley lands revert back to their original zoning Objective 'G'.</p> <p>In the event that Zoning Objective 'I' remains, it is recommended that land uses Aerodrome/Airfield, Concrete/Asphalt Plant in or adjacent to a Quarry be open for consideration, and that Hotel/Motel and Public House be open for consideration (in existing premises).</p>
<p><b>Comments which do not relate to any Proposed Amendment</b></p> <p>Comment in relation to socio-economic rationale to justify all proposed development.</p> <p>Recommend that the Garda Divisional Crime Environmental</p>	<p>Amend0014 Amend0055</p>	<p><b>Manager's Response</b></p> <p>This submission (or part thereof) does not address the specific changes to the draft written statement in any proposed amendment and is therefore deemed to be invalid.</p>

Officer be consulted by the planning department to ensure best practice in planning for the prevention of crime and anti social behaviour and also to ensure that cognisance is afforded to the needs of An Garda Síochana		<b>Manager's Recommendation</b> No change recommended
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## A LIVING PLACE

### Housing

Proposed Amendment Ref.	Sub No	Manager's Response and Recommendations
<p><b>PA014</b></p> <p>Seeks the modification of sections of the text to enhance the council's policy in the area of social segregation, social/affordable/private housing and mix of tenure.</p>	<p>Amend0027</p>	<p><b>Manager's Response</b></p> <p>It is considered that the Strategy of the Council for residential development in the County as set out in the Draft Development Plan adequately addresses issues such as social segregation, social/affordable/private housing and mix of tenure.</p> <p><b>Manager's Recommendation</b></p> <p>No change recommended.</p>
<p><b>PA015</b></p> <p>Support for the amendment to the definition of brownfield sites.</p>	<p>Amend0051</p>	<p><b>Manager's Response</b></p> <p>Comments noted.</p> <p><b>Manager's Recommendation</b></p> <p>No change recommended.</p>
<p><b>PA018</b></p> <p>Seeks clarification that the facilitation of a cluster-type residential development requires an Appropriate Assessment and if so, Policy H29 should be reconsidered.</p> <p>Proposed that the word "residents" in the first proposed paragraph be replaced by the word "applicants". This paragraph is not consistent with the Sustainable Rural Housing Guidelines 2005 or with Circular SP 5/08 - neither are restrictive to residents.</p> <p>Acknowledgement that there is an attempt to control the</p>	<p>Amend0033 Amend0017 Amend0049</p>	<p><b>Manager's Response</b></p> <p>Notwithstanding the recommendation in the Environmental Assessment that the proposed amendment be omitted due to possible significant negative residual impacts all plans and projects will be required to be screened for possible impact on Natura 2000 sites. Meeting the requirements of the habitat directive will form part of any assessment of the merits of a particular scheme. Given that already within the Plan there are clear policies supporting the implementation of the Habitats directive there is no need to insert such a clause into the proposed amendment.</p> <p>It is not considered appropriate to broaden the scope of such provision to include non-locals having regard to the intention to address local housing need only.</p>



<p>spread of one-off houses.</p>		<p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>PA019</b> Proposed that the Policy H30(A) be relocated to a new section 1.2.52.i(a) and be renamed as Policy H29(A): Rural Housing Policies and Local Need Criteria- to be consistent with Section 1.2.51 Management of One-Off Housing in Rural Areas. Proposed policy is not consistent with either the Sustainable Rural Housing Guidelines 2005 nor Circular SP 5/08.</p>	<p>Amend0017</p>	<p><b>Manager's Response</b> Whilst the Manager's advice against this amendment stands the proposed the proposed relocation of the policy statement will have no material effect.</p> <p><b>Manager's Recommendation</b> Location of this amendment is not material.</p>
<p><b>PA020</b> Policy H31(A)- It is proposed that this new Policy be amended to include applicants with exceptional health circumstances. It is proposed that the wording of the proposed new Policy H31(A) be modified to the following:- 1.2.52.iii(a) Policy H31(A): Exceptional Housing Need in Dublin Mountain Zone It is the policy of the Council within areas designated with Zoning Objective 'H' ("to protect and enhance the outstanding natural character of the Dublin Mountain Area") to consider permitting a new or replacement dwelling on a suitable site where exceptional health circumstances exist, whether such circumstances relate to the applicant themselves or where the applicant is a person such as a Registered General Nurse, caring, nurturing and looking after the health and well being of an immediate elderly family member or relation in the community in a professional capacity that would otherwise require hospitalisation." Section 4.3 of the Sustainable Rural Housing Guidelines provides that planning authorities should consider</p>	<p>Amend0017</p>	<p><b>Manager's Response</b> 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. It is considered that PA020 is not consistent with the Rural Housing guidelines and should be omitted from the Draft Development Plan. Furthermore the environmental report raises concerns with respect of the effect of this amendment.</p> <p><b>Manager's Recommendation</b> That proposed PA020 be omitted from the Draft Development Plan.</p>

<p>granting planning permission where the exceptional health circumstances relate to the applicant themselves as distinct from a person under the applicant's care.</p>		
<p><b>PA021</b></p> <p>Reference to Agricultural buildings in Policy H32(A) should be a caveat to ensure they are situated and designed so as not to impact on the landscape and biodiversity of the Liffey Valley zoned area.</p> <p>Support for the designation of the Liffey Valley Zoning.</p> <p>Support for the creation of an Architectural Conservation Area along the Liffey Valley to incorporate the weirs, mills and industrial cottages.</p> <p>Comment requesting that the ongoing operations of the Leixlip Power Station site are supported in Development Plan policy and in any future planning application. Critical that ESB are not restricted in any way in fulfilling its mandate as energy supplier, additional lands for expansion must be available for ESB to meet statutory regulations and increasing energy demands.</p> <p>Comment regarding support of policy EC9 of the Draft Development Plan and wished to see similar recognition given to its strategic role in the description of the Liffey Valley zoning.</p>	<p>Amend0032 Amend0033 Amend0038</p>	<p><b>Manager's Response</b></p> <p>At the meetings in May 2010, the Council Members were advised that the introduction of another zoning would add further complexity to the Development Plan without any real effective increase in protection to already highly protected lands. While noting the support for the proposed amendment this remains the strong advice of the Manager. Furthermore the attendant changes to the Draft plan on foot of those motions could result in a series of unintended consequences to the Plan.</p> <p>It is not considered appropriate at this stage in the Development Plan process to discuss proposals for new Architectural Conservation Area(s) as these proposals do not relate to a proposed amendment number. It is considered that the Development Plan contains sufficient policies in relation to the historical structures in the Liffey Valley area.</p> <p>It is considered that having regard to the ongoing public service facilities at Leixlip that any expansion of these facilities would be considered in the light of policies generally supporting these facilities and the fact that they are established necessary uses.</p> <p><b>Manager's Recommendation</b></p> <p>It is recommended that the Liffey Valley lands revert back to their original zoning Objective 'G' and the proposed amendment be omitted from the Draft Development Plan</p>
<p><b>PA023</b></p> <p>Policy H33(A): Rural Communities of Glenasmole /Bohernabreena /Ballinascorney /Brittas is not consistent with the Sustainable Rural Housing Guidelines 2005 or with</p>	<p>Amend0017</p>	<p><b>Manager's Response</b></p> <p>Notwithstanding the recommendation in the Environmental Assessment that the proposed amendment be omitted due to the likelihood of significant negative residual impacts the proposed amendment must be considered in the context of the range of policies relevant to the Dublin</p>

<p>Circular SP 5/08 neither of which are restrictive to “local residents”. It is proposed that the words “local residents” in this new Policy H33(A) be deleted and be replaced by the word “applicants”.</p> <p>It is proposed that the wording of Policy H33(A) be modified to the following:- 1.2.52.v(a) Policy H33(A): Rural Communities of Glenasmole /Bohernabreena /Ballinascorney /Brittas It is the policy of the Council to seek to ensure the long term viability of the rural communities of Glenasmole /Bohernabreena /Ballinascorney /Brittas and to this end, will facilitate applicants who wish to build a family home in their local area. Development proposals for new or replacement dwellings located within the areas of Glenasmole /Bohernabreena /Ballinascorney /Brittas will only be permitted on suitable sites where, • Applicants can establish a genuine need to reside in proximity to their employment; (such employment being related to the rural community) Or • Applicants have close family ties with the rural community.</p>		<p>Mountains. In this context it is considered that the wording of the amendment as was on display is reasonable</p> <p><b>Manager's Recommendation</b> No change recommended</p>
<p><b>PA025</b></p> <p>Inclusion of reference to the Code of Practice welcomed.</p>	<p>Amend0035</p>	<p><b>Manager's Response</b></p> <p>Comment noted.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>PA026</b></p> <p>This is a positive step although, in our opinion, we believe that the Council has a responsibility to ensure that any Management Companies which are created as part of a development are properly constituted and run in the best interests of the residents.</p>	<p>Amend0049</p>	<p><b>Manager's Response</b></p> <p>It is considered that this policy deals with the issue of private management companies in the most appropriate manner available to the Council.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>

### Social Inclusion, Community Facilities and Recreation

Proposed Amendment Ref.	Sub No	Manager's Response and Recommendations
<p><b>PA030</b></p> <p>Recommends an amendment to Policy SCR12(A) to read as follows: Co-operation with existing schools and the Department of Education and Science in the Sustainable Development of existing Schools and Educational Institution Sites. It is the policy of the Council to support and assist existing schools and the Department of Education and Science in proposals for sustainable and appropriate development on existing school and educational institution sites within the County.</p> <p>The Department of Education and Skills acknowledges the content of this amendment in regard to the development of existing schools, the assessment of school capacity in regard to new residential development and the review of the need for schools within the county.</p> <p>The name Department of Education and Skills be inserted instead of Department of Education and Science everywhere it occurs in the South County Dublin Development Plan</p> <p>When sites are being chosen, account must be taken of the traffic safety, access to public transport and traffic disruption should all be taken into account.</p>	<p>Amend0007 Amend0019 Amend0004 Amend0049</p>	<p><b>Manager's Response</b></p> <p>The proposed amendment is considered appropriate.</p> <p>Comment noted.</p> <p>It is considered that these issues have been adequately addressed in the Draft Plan.</p> <p><b>Manager's Recommendation</b> Rewording of Policy SCR12(A) to read Co-operation with existing schools and the Department of Education and Skills in the Sustainable Development of existing Schools and Educational Institution Sites.</p> <p>It is the policy of the Council to support and assist existing schools and the Department of Education and Skills in proposals for sustainable and appropriate development on existing school and educational institution sites within the County.</p>
<p><b>PA031</b></p> <p>The Department of Education and Skills acknowledges the content of this amendment in regard to the development of existing schools, the assessment of school capacity in regard</p>	<p>Amend0019 Amend0049</p>	<p><b>Manager's Response</b></p> <p>Comment noted.</p>

<p>to new residential development and the review of the need for schools within the county.</p> <p>Agree with the sentiments in this amendment, we feel that the selection of School and educational institution sites must take into account the accessibility of the site by public transport and its location in relation to the target audience for accessibility by walking and cycling – especially for primary schools.</p> <p>Concerns are partly addressed by: 1.3.20.iii(b)Policy SCR12(B): New Residential Development and the Assessment of School Capacity</p>		<p>It is considered that these issues have been adequately addressed in the Draft Plan.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>PA032</b></p> <p>The Department of Education and Skills acknowledges the content of this amendment in regard to the development of existing schools, the assessment of school capacity in regard to new residential development and the review of the need for schools within the county.</p>	<p>Amend0019</p>	<p><b>Manager's Response</b> Comment noted.</p> <p><b>Manager's Recommendation</b> No change required.</p>
<p><b>PA033</b></p> <p>Concerns are partly addressed by: 1.3.20.vi(a)Policy SCR 15(A): Safe Queuing and Drop-Off Facilities.</p> <p>Welcome SDCC's proposal to introduce safe queuing and drop off facilities at primary and secondary schools.</p>	<p>Amend0049 Amend0055</p>	<p><b>Manager's Response</b> Comments noted.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>PA035</b></p> <p>The problem of institutional lands being developed is hinted at but not sufficiently dealt with by the section 1.3.35 Recreation</p>	<p>Amend0049</p>	<p><b>Manager's Response</b></p> <p>It is not considered appropriate at this stage in the Development Plan process to discuss the issue of the development of institutional lands as this issue does not relate to a proposed amendment to the Draft Plan. It is considered that the issue of Recreation and Open Space is adequately</p>

		addressed in the Draft Plan.  <b>Manager's Recommendation</b> No change recommended.
<b>PA036</b>  We hope that this policy will be carried out, especially in the Two SDZs in the county as well as in infill developments	Amend0049	<b>Manager's Response</b>  It should be noted that the roll out of the two Strategic Development Zones in the County shall be in accordance with the Planning Schemes adopted by An Board Pleanála. If the amendment is accepted it will become a stated policy of the County Development Plan and will be carried across the County.  <b>Manager's Recommendation</b> No change recommended.
<b>PA040</b>  This is a useful aspiration but we would go further to say that the layout of all open space in a development, and especially in a high density development, should be usable to the community	Amend0049	<b>Manager's Response</b>  As stated in section 1.3.37 all new public open spaces should be designed with the needs of all users in mind, however, this section attempts to deal with specifically the facilitation of children's play by incorporating formal equipped play areas. It is considered that the issue of open space has been adequately addressed in the Draft Plan.  <b>Manager's Recommendation</b> No change recommended.
<b>PA042</b>  Support this amendment  Welcome this policy	Amend0031 Amend0049	<b>Manager's Response</b>  Comments noted.  <b>Manager's Recommendation</b> No change recommended.
<b>PA043</b>	Amend0046	<b>Manager's Response</b>

<p>The new sentence regarding allotments should be expanded to acknowledge the role of allotments in affording resilience to climate change e.g. food security.</p>		<p>It is considered that the issue of Allotments, in the context of the rationale for providing such facilities in the County, has been adequately addressed in the Draft Plan.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>Comments which do not relate to any Proposed Amendment</b></p> <p>Comment in relation to green spaces and inserting boundaries to all open spaces.</p> <p>The RIAI believes that there is much in the SDCC Draft Development Plan to support, in particularly its focus on urban design and neighbourhood planning. However, the role of the school, particularly school location and integration in the development of the neighbourhood, is underdeveloped</p>	<p>Amend0014 Amend0046</p>	<p><b>Manager's Response</b></p> <p>This submission (or part thereof) does not address the specific changes to the draft written statement in any proposed amendment and is therefore deemed to be invalid.</p> <p><b>Manager's Recommendation</b> No change recommended</p>

### Sustainable Neighbourhoods

Proposed Amendment Ref.	Sub No	Manager's Response and Recommendations
<p><b>PA050</b></p> <p>The final principle regarding hard surfaces could also reference the following document:<a href="http://www.communities.gov.uk/documents/planningandbuilding/pdf/pavingfrontgardens.pdf">http://www.communities.gov.uk/documents/planningandbuilding/pdf/pavingfrontgardens.pdf</a> Note many of the principles referred to in this policy do not relate to solar gain, rather wider issues of sustainability and should be under a</p>	<p>Amend0046 Amend0035</p>	<p><b>Manager's Response</b></p> <p>It is considered that the issue of Solar gain and hard surfacing as set out in this section have been adequately addressed.</p> <p>Comment noted.</p>

<p>separate heading or headings.</p> <p>Inclusion of SUDS technologies to be incorporated is noted.</p>		<p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>PA51</b></p> <p>The RIAI propose the policy should be reworded as follows: "It is the policy of the Council to promote a practice in building construction of the highest standards of energy efficiency particularly in the area of insulation, air tightness, passive solar gain, efficiency and provision of appropriate renewable energy systems. While Specific Energy Performance standards of new buildings are set by National Standards i.e. Building Regulations energy performance and renewable energy installations exceeding the minimum statutory requirements will be encouraged to as high a degree as practically possible in any given situation".</p>	<p>Amend0046</p>	<p><b>Manager's Response</b></p> <p>It is considered that the policy as set out is satisfactorily worded in relation to this matter.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>Comments which do not relate to any Proposed Amendment</b></p> <p>Comment in relation to widening the types of architectural landmarks beyond new, modern buildings.</p>	<p>Amend0014</p>	<p><b>Manager's Response</b></p> <p>This submission (or part thereof) does not address the specific changes to the draft written statement in any proposed amendment and is therefore deemed to be invalid.</p> <p><b>Manager's Recommendation</b> No change recommended</p>



## CONNECTED PLACE

### Transportation

Proposed Amendment Ref.	Sub No	Manager's Response and Recommendations
<p><b>PA053</b>                      Replace reference to DTO with NTA- have regard to comments on Amendment PA069 in relation to NTA Strategy and Implementation Plan.</p>	<p>Amend0041</p>	<p><b>Manager's Response</b>                      Comment noted.</p> <p><b>Manager's Recommendation</b>                      Amend the draft Development Plan to replace references to 'Dublin Transportation Office / DTO' with 'National Transport Authority / NTA' as appropriate</p>
<p><b>PA054</b></p> <p>Concern regarding 2.2.9.ii Policy T4A Underutilised /QBCs. Schemes where bus priority is provided in addition to existing roadway infrastructure are constructed where there is significant demand for public transport and are therefore unlikely to be considered "underutilised" It is requested that this policy be removed.</p> <p>To change QBCs to part-time QBCs or to remove them altogether would be a retrograde step. Any move to increase the vehicular capacity of a road whilst reducing its appeal for public transport is neither sustainable nor in line with the Department of Transport's Smarter Travel policy.</p> <p>It should be noted that removing the QBC on the ORR would increase the noise on ORR and would be at odds with the Aim in 2.4.1 of the Environmental services section</p>	<p>Amend0025                      Amend0049                      Amend0049                      Amend0041</p>	<p><b>Manager's Response</b>                      At the core of the Draft Development Plan is the promotion of a more sustainable County. Central to this is the promotion of improved public transport. Bus is an important element of this. It is considered that the effect of this policy would be the promotion of private car use and a reduction in the capacity, attractiveness and speed of public transport in the County. The proposed amendment is not considered appropriate to be included in the County Development Plan as responsibility for the management of the dedicated bus lanes does not lie with the Council. It is understood that there is an imminent proposal by Dublin Bus to provide a new bus route along the ORR.</p> <p><b>Manager's Recommendation</b>                      That Section 2.2.9.ii Policy T4A: Underutilised QBCs, be omitted from the Draft Development Plan.</p>

<p>PA054- Amendment does not identify the QBC's in question, why they are considered underutilised and whether the reallocation of road space currently allocated to bus, to other road users, is on a temporary or permanent basis. The QBC network should be considered as a whole as the removal of specific segments of the network could undermine its overall benefits. In advance of any reallocation of road space it would need to be demonstrated that there is a lack of public transport demand on the routes in question, taking into consideration the potential for bus route reconfiguration. The NTA does not support the inclusion of the amendment and recommends that it is not included in the Development Plan.</p>		
<p><b>PA056</b> On completion of details-final alignment of Lucan Luas should be reserved and illustrated on development plan maps.</p>	<p>Amend0029</p>	<p><b>Manager's Response</b> The Luas Line F will be included in the Development Plan when the route is finalised.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>PA057</b> Support this amendment</p> <p>The additional sentence "In view of promoting a healthy lifestyle" should be expanded as follows "In view of promoting a low carbon and healthy lifestyle". The proposed new walkways and cycle routes could also incorporate the identification &amp; mapping of rural roads with designation of green roads within the Local Authority where pedestrians and cyclists are prioritized with low speed limits, restricted sight lines, and integral calming measures (hills, hollows trees etc). Where such rural roads are identified, hedgerows, native trees, and real local stone walls should be reinstated and inappropriate walls and fences to be removed restoring linear</p>	<p>Amend0031 Amend0046 Amend0041</p>	<p><b>Manager's Response</b> The insertion of the words ' low carbon' in Amendment PA057 is considered reasonable. There is difficulty in traffic calming country roads, due to the problem of installing ramps where there is a proliferation of vehicles such as HGVs and agricultural vehicles and the requirement for public lighting at traffic calming features.</p> <p>It is considered appropriate that the provisions of the Development Plan regarding cycling facilities be aligned with relevant guidance provided by the NTA.</p> <p><b>Manager's Recommendation</b> That the proposed amendment be revised to read " : "In view of promoting a low carbon and healthy lifestyle....".</p>

hedgerows. The Development Plan should make provision for the enforcement of new public boundary biodiversity standards.

The proposed amendment to improve road safety for pedestrians and cyclists by lowering speed limits and priority over motorised transport, should be the ambition for town centres and residential areas, but that approach should not be applied across the board. The statement also appears to contradict Table 2.2 where roads are identified for 'on road cycle tracks' and others for 'off road cycle tracks'- it is noted that all roads in Table 2.2 involve the provision of some class of cycle track, - no road is identified for mixed cycling with no infrastructure. Table 2.2 provides very little information on the detail of the cycle routes set out as part of specific roads, where possible dimensions and particulars Should be specified. it is also inconsistent in the relationships between cycle facilities and road type, e.g. National Roads with on road facilities Vs local roads with off- road cycle tracks. Recommendation that the amendment is reworded as follows; "Cycle provision, whether integrated with low speed, low volume general traffic in locations such as town centres or residential areas, or segregated from general traffic on higher speed and volume roads, will be provided in line with the forthcoming NTA's National Urban Cycle Manual." This process would include inter alia: -Survey of the existing infrastructure -Quality of service rating -Network Planning for cycling as part of the overall Network Planning for all modes on all routes (NB. including HGV's) -Segregation vs. Integration of facilities provision of cycleways and other off-road routes, e.g. through parks etc. -Development of a cycle parking policy - for public and private developments - Interaction between cycling and public transport -Special attention paid to routes to school.

And that the following new paragraph be added:

"Cycle provision, whether integrated with low speed, low volume general traffic in locations such as town centres or residential areas, or segregated from general traffic on higher speed and volume roads, will be provided in line with the forthcoming NTA's National Urban Cycle Manual."

<p><b>PA058</b></p> <p>Support intention of the proposed amendment. Council should also refer to the Consultation Draft Guidelines on Spatial Planning and National Routes- section 3.3 and the associated Appendix 3, which contain further guidance on the preparation of and need for such Assessments.</p>	<p>Amend0023</p>	<p><b>Manager's Response</b></p> <p>It is agreed that the reference should also be included. It should be noted in this context that the overall focus of the development plan is to seek to consolidate the built-up area and to increase the intensity of employment at strategic locations (EP1 zoning) well served by public transport, particularly rail based systems. To facilitate this additional lands have been appropriately zoned to allow for established but less intensive uses to move from the above areas but stay within the county and the metropolitan area.</p> <p><b>Manager's Recommendation</b></p> <p>Amend the proposed amendment to add the following at the end of the last sentence:</p> <p>“and, as far as practicable, shall be consistent with guidance provided in Spatial Planning and National Roads Consultation Draft Guidelines for Planning Authorities, DEHLG June 2010 (or as may be amended).”</p>
<p><b>PA059</b></p> <p>Location not marked on the revised Draft Development Plan Map, previous such proposal on north side of Leixlip road was refused planning permission. New Policy addition should be removed. Clashes with objective of PA021 and in contradiction to PA158. Object to Park and Ride proposed on any land which comprises the Liffey Valley SAAO or proposed SAAO extension or NHA or land zoned high amenity or agricultural or open space in the Valley.</p> <p>The proposed location is not at a public transport node and consequently is not a suitable position for a Park and Ride</p> <p>NTA supports the provision of park and Ride facilities, however has some concerns in relation to the location of the proposed sites. It needs to be clearly stated whether the</p>	<p>Amend0026 Amend0049 Amend0041 Amend0041</p>	<p><b>Manager's Response</b></p> <p>It is noted that the location indicated lies within the area to which proposed Zoning Objective 'I' relates, and that the limitations on development as detailed in PA021 would, as drafted, appear to preclude a park and ride facility in this location. Notwithstanding this the proposed amendment seeks for the matter to be investigated. It does not give a commitment to these lands being supported for the proposed use.</p> <p>The list of proposed sites as shown in Table 2.2.3 would all be strategic sites serving the City Centre. They have been developed over a period of time to reflect suitable locations and/or access to future or existing public transport nodes.</p> <p><b>Manager's Recommendation</b></p> <p>In the event of the zoning objective 'I' being retained that proposed Amendment PA059 be omitted from the Draft Development Plan.</p>

<p>function of these Park and Ride facilities relate to bus or rail and whether these sites would be of a strategic or local function. Park and Ride facilities- either strategic or local, should only seek to cater for trips where no reasonable alternative exists to the use of the car in the first instance, and should not negatively impact on the attractiveness and viability of reasonable alternatives, in particular scheduled bus services. It is unclear from Table 2.2.3 whether the proposed park and ride sites are proposed to be strategic or local in function. PA0059 should be amended/expanded on to include criteria showing how all proposed park and ride sites were identified and whether these sites are local or strategic.</p> <p>Tara Co-Op Site- it is unclear at this stage, why park and Ride would either be necessary or desirable in this town centre type location. Garters Lane site- it is not clear why this would be required, in addition to the facility already committed to at Cheeverstown stop and the existing facility at the Red Cow stop. Walkinstown Roundabout Site- it is not clear what the basis for this would be, it would appear to conflict with the general objectives relating to the provision of Park and Ride. Recommend that the subject of the proposed amendment and the other park and ride sites listed in the Draft Plan should be re-examined and park and ride policy should be revised, including a criteria based approach, identifying whether the proposed sites are rail or bus based and whether they are strategic or local.</p>		
<p><b>PA060</b></p> <p>NTA supports the proposed amendment</p>	<p>Amend0041</p>	<p><b>Manager's Response</b> Comments noted.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>

<p><b>PA064</b></p> <p>Propose consideration of a 30kph speed limit outside all schools within the County.</p> <p>Proposal for a 30kph speed limit outside all schools within the County.</p> <p>Propose consideration of a 30kph speed limit outside all schools within the County.</p> <p>Propose the consideration of a 30kph speed limit outside all schools within the County for safety reasons.</p>	<p>Amend0031 Amend0015 Amend0043 Amend0020</p>	<p><b>Manager's Response</b> Guidelines for the Application of Special Speed Limits included in the Road Traffic Act 2004 Section 9 (9) advise that the special 30kph speed limit is only to be used in the following cases, and that "Central to the consideration for the use of the speed limit is that its success should not be dependent on the use by the Gardaí of an unreasonable level of enforcement. Therefore the speed limit must be essentially self-enforcing.</p> <p>A 30 km/h speed limit should only be considered on roads/streets where:</p> <p>The needs of vulnerable road users are deemed to take precedence over those of motorists but where access is allowed for vehicles;</p> <p>The 85 percentile speed of vehicles does not exceed 40 km/h. If it exceeds this speed then environmental/engineering measures must be provided to reach this target before the new limit is applied."</p> <p>Whilst locations outside schools have merit for the introduction of a special speed limit, it is considered that this should be done on a case by case basis as some schools on busy roads may not be suitable for this kind of speed restriction. Furthermore these works would be subject to the availability of resources.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>PA065</b></p> <p>Supports the inclusion of new Policy T25B Heavy Goods Vehicles Restriction</p> <p>Support for the inclusion of new policy T25(B) to introduce a School time Heavy Goods Vehicle Restriction on the Newcastle road, Lucan.</p> <p>Support the inclusion of PA065 Section 2.2.31 – New Policy</p>	<p>Amend0013 Amend0015 Amend0043 Amend0044</p>	<p><b>Manager's Response</b> It is noted that due to the 3 tonne limit on the Outer Ring Road, the R120 is the critical North-South road in the area without weight restriction, and the proposed amendment will therefore restrict all HGV movement N-S to the Fonthill Road only.</p> <p><b>Manager's Recommendation</b> That proposed Amendment PA065 be omitted from the Draft Development Plan.</p>

<p>T25B in the County Development Plan,  Fully support the inclusion of PA0065- School time HGV restriction.</p>		
<p><b>PA066</b></p> <p>Seeks an amendment to the required parking levels for dwelling houses and apartments.</p> <p>Note 2, which is located after the road tables, should not be changed and the length of the parking bays should remain at 4.75m.</p> <p>NTA views the supply and management of parking as central to the management of transport demand. Whilst the policy to require maximum parking standards is welcomed, the NTA does not agree that such standards should be 'required' rather than 'permitted'- this undermines the principle of applying maximum parking standards. Table 2.2.4 note 6- this approach is a presumption that the maximum standard is required in almost all locations and can only be reduced by a maximum of 20% in limited circumstances. The level at which maximum standards are set is of great importance- where they exist, maximum standards are usually applied with varying degrees of constraint on the basis of defined location factors such as centrality- the application of parking standards would normally vary inversely with density. NTA recommends that the Planning Authority replaces 'required maximum parking standards' with 'permitted maximum parking standards' combined with a spatial definition, taking into account the location of development in relation to existing and future public transport and other services such as town or district centres.</p>	<p>Amend0049 Amend0008 Amend0041 Amend0044 Amend0044</p>	<p><b>Manager's Response</b> Clarification of parking bay dimensions is required and revised dimensions are set out below.</p> <p>With regard to the recommendation to replace 'required maximum parking standards' with 'permitted maximum parking standards' it is noted that the car parking standards detailed in the relevant Draft Development Plan policies, in particular Policies T26 and T29, place due emphasis on the overriding objective of seeking to reduce dependence on the private car, and are considered satisfactory.</p> <p>It is noted that at the Council Meeting on 6th May 2010 it was agreed to refer further consideration of the car parking standards to the Transportation Strategic Policy Committee.</p> <p><b>Manager's Recommendation</b> Amend Note 2 to Table 2.2.4 to read: All surface car parking will be 2.5m wide by 5m in length. In multi-storey or basement parking areas all parking bays (other than those reserved for disabled persons) shall be 2.5m in width and 4.8m in length, exclusive of any structural pillars and other obstacles.</p>

<p>Clarification sought, amendment appears to be conflicting... standards set out as 2.5m wide and 5m in length and then stated as 2.5m wide and 4.75m in length. Accepted standard used by Tesco and other retailers is 2.5m x 4.8m. Due to an unnecessary increase the size of car parking would represent and unsustainable use of land.</p> <p>Proposed standard of 1:40 would represent a halving of the maximum car parking standard as specified in the Current Development Plan. This fails to recognise that a foodstore has different characteristic to other retail developments. The Appropriate car parking standards for foodstores is 1:14- Parking Analysis document provided.</p>		
<p><b>PA068</b></p> <p>Support intention of the proposed amendment. Council might consider including reference to the NRA 2006 publication, Guidelines for the Crossing of Watercourses, During Construction of National Road Schemes.</p> <p>Amendment welcomed however, consideration should also be given to reference to the need for Appropriate Assessment Screening as appropriate.</p> <p>Have regard to comments made on Amendment Ref PA0069. Replace reference to DTO with NTA.</p>	<p>Amend0023 Amend0035 Amend0041</p>	<p><b>Manager's Response</b> It is considered that the document noted in section 2.3.37:- 'Requirements for the Protection of Fisheries Habitat during the Construction and Development Works at River Sites' will provide adequate and up to date guidance. Requirements for Appropriate Assessment of relevant projects are addressed in Policy LHA9 as amended by PA144. The replacement of references to DTO by NTA is addressed in the Manager's Response to PA053.</p> <p><b>Manager's Recommendation</b> No change recommended</p>
<p><b>PA069</b></p> <p>Recommends that the N81 Tallaght to Hollywood Cross Road</p>	<p>Amend0003 Amend0030 Amend0041</p>	<p><b>Manager's Response</b> The recommendation that the N81 Tallaght to Hollywood Cross Road Improvement Scheme be retained as a 6-year roads objective in Table</p>



<p>Improvement Scheme be retained as a 6-year roads objective in Table 2.2.5 as this scheme is receiving a significant priority within the NRA.</p> <p>Clarification sought on the Council's roads objectives, in particular, request for a clear indication of the nature and timeframe for the road proposals affecting areas where Topaz filling stations are located.</p> <p>Recommends that a number of additional amendments be included in the Draft Plan to reflect the role of the NTA in future transport provision in South Dublin. The Development Plan should refer to the role of the NTA Strategy in relation to identifying the requirements for new road improvements schemes. Recommend the preparation of a 'Local Traffic Plan' for the County and the need for it to be consistent with the Strategic Traffic Management Plan to be produced by the NTA to be included as a stated objective of the Development Plan. It is the NTA's view that Policy T34 of the Draft Plan, which commits to implementing the road improvement schemes set out in Table 2.2.5 is premature in light of the Local Authorities' Statutory requirement under Section 65 of the DTA Act. Recommend that Policy T34 be replaced with a statement such as "Review, and set out, and implementation plan, for the road schemes in table 2.2.5 as part of a 'local traffic plan' to be prepared following the publication of the NTA Transport Strategy for the GDA.</p>		<p>2.2.5 is noted, however, as the full route selection has not been completed it is considered appropriate to include this objective under Long-term proposals in Table 2.2.6. Due to the uncertain nature of current funding allocations the Council is unable to give more definite time lines for road projects. The NTA recommendation to substitute a new statement in place of Policy T34 will align the relevant provisions with the forthcoming NTA Transport Strategy.</p> <p><b>Manager's Recommendation</b></p> <p>Insert the following into Table 2.2.6 Long Term Road Objectives:</p> <table border="1" data-bbox="1137 639 2016 703"> <tr> <td>National Secondary Route</td> <td>N81 from M50 to Hollywood Cross Road Improvement Scheme</td> </tr> </table> <p>Amend Policy T34 to read as follows:</p> <p>2.2.38.i Policy T34: Roads Objectives It is the policy of the Council to review and set out an implementation plan for the road schemes set out in Table 2.2.5 as part of a 'local traffic plan' to be prepared following the publication of the NTA Transport Strategy for the GDA, to implement the other road objectives shown in the Plan in the longer term, and to improve the existing roads of the County where necessary.</p>	National Secondary Route	N81 from M50 to Hollywood Cross Road Improvement Scheme
National Secondary Route	N81 from M50 to Hollywood Cross Road Improvement Scheme			
<p><b>PA070</b></p> <p>Supports the removal of the proposed road linking Esker Meadow View with Esker Lane</p>	<p>Amend0016 Amend0023 Amend0026 Amend0026 Amend0049 Amend0030</p>	<p><b>Manager's Response</b></p> <p>It is considered that the linking of the N7 to the Rathcoole Relief Road at Keating's Park is necessary for the sustainable development of the County. Also, the public transport bridge over the M50 would significantly help to improve access for cyclists, walkers and public transport users. Any works would require an EIA and due consideration would take place</p>		

<p>Presumption on part of NRA against further junction capacity increases on the motorway/high quality dual carriageway network. Additional connectivity from Keatings Park particularly relevant in this regard</p> <p>Support amendment to remove the inclusion of the bridge over the River Dodder.</p> <p>Object to M50 Overbridge from Red Cow to Ballymount (Public Transport only), it would have a negative effect on the archaeological complex at Ballymount and break up the open space of the Park.</p> <p>Welcome the removal of the proposal for a bridge at Oldcourt. This will have a positive effect on the sensitive and beautiful Dodder Valley.</p> <p>Clarification sought on the Council's roads objectives, in particular, request for a clear indication of the nature and timeframe for the road proposals affecting areas where Topaz filling stations are located.</p> <p>Objects to the proposed route Option 7a for the R120 Road Improvement Scheme because of its impact on the heritage of the 12th lock.</p> <p>Objects to the proposed route of the 'Outer Western Road' and contend that it should be located further west.</p>	<p>Amend0045 Amend0033</p>	<p>on the effect of the bridge on the archaeological site and park. Removing the proposal at this stage would be inappropriate as, subject to appropriate assessment, the link offers considerable benefits to the regeneration of the Ballymount Industrial area. The improvement of the R120 and the completion of the Outer Western Road at its designated location are also considered to be important for the sustainable development of the County. Due to the uncertain nature of current funding allocations, the Council is unable to give more definite time lines for road projects. While support for the removal of the proposed extension from Esker Meadow View with Esker Lane is noted, it considered that the proposal would provide a necessary link to allow for greater permeability in the area and help alleviate traffic congestion. The above response is has given consideration to the environmental report which recommends that the proposed Keatingspark Junction be omitted, and backed the retention of the Esker Lane to Esker Meadow View long term road objective in order to reduce car dependency.</p> <p><b>Manager's Recommendation</b> Revert omission of extension from Esker Meadow View to meet Esker Lane</p>
<p><b>Comments which do not relate to any Proposed Amendment</b></p> <p>Comment in relation to reviewing proposed amendments as</p>	<p>Amend0023 Amend0029 Amend0029 Amend0032</p>	<p><b>Manager's Response</b> These comments do not relate to specific changes to the Draft Development Plan proposed in any amendment and are therefore not considered to be relevant at this stage of the development plan review</p>

they relate to transportation, including national roads and land use, taking account of the Draft Spatial Planning and National Roads Guidelines.

Request that general policies be strengthened in favour of Metro West and reconsider EP1 zoning in close proximity to Metro West Stops.

Request that if metro West is granted a Railway Order during the lifetime of the Plan an assessment will be carried out to determine whether rezoning of the land currently zoned Green Belt at Newlands for future development should take place.

Comment in relation to the fact that there are no proposed amendments addressing the significant concerns on Metro West and the Outer West Route.

process.

**Manager's Recommendation**

No change recommended.

## Water Supply and Drainage

Proposed Amendment Ref.	Sub No	Manager's Response and Recommendations
<p><b>PA071</b></p> <p>Amendment acknowledged and welcomed.</p>	<p>Amend0035</p>	<p>Manager's Response Comment noted.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>PA072</b></p> <p>Amendment is acknowledged.</p>	<p>Amend0035</p>	<p><b>Manager's Response</b> Comment noted.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>PA073</b></p> <p>Comment stating that the setback of development of 10m from the top of a bank is not sufficient and that it should be changed to 15m at a minimum.</p>	<p>Amend0049</p>	<p><b>Manager's Response</b> The noted sections, 2.3.9 and 4.3.7xvii of the Development Plan are both proposed for amendment to allow for increased riparian corridors under particular circumstances.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>PA074</b></p> <p>The corollary to this should also apply, namely that development should be limited or stopped completely if the required capacity is not present.</p> <p>Consideration should be given to inclusion of a reference to 'assimilative capacity' of receiving waters as a constraint on</p>	<p>Amend0049 Amend00 35 Amend0035</p>	<p><b>Manager's Response</b> It is considered that the issue is adequately and appropriately addressed in the Draft Development Plan, however the inclusion of reference to the 'assimilative capacity of receiving waters' is considered appropriate.</p> <p><b>Manager's Recommendation</b> It is recommended that the proposed amendment be revised to read as follows:</p>

<p>discharges to protect ecological integrity.</p> <p>In proposing the plan, and any related modifications of the Plan, and in implementing the Plan, adequate and appropriate infrastructure should be in place to service any development proposed and authorised during the lifetime of the particular plan. In particular, appropriate wastewater treatment, water supply, surface and storm water drainage, transport, waste management, community services and amenities etc. should be planned and phased to address any current problems or deficits and to reflect predicted increases in population.</p>		<p>"It is an objective of the Council that sufficient conveyance capacity should be available within the receiving sewerage system locally, and that sufficient treatment capacity and assimilative capacity to ensure ecological integrity should be available downstream at the relevant Waste Water Treatment Plant and receiving waters."</p>
<p><b>PA077</b></p> <p>Consideration should be given to ensuring that any proposed development which may arise out of the Proposed Amendments takes into account the findings of the Flood Risk Assessments conducted for the County including the Dodder and CFRAMS where relevant and appropriate.</p> <p>Comment in relation to the Reference to the DoEHLG Draft Flood Risk Management Guidelines (2008) in the first paragraph should be amended to refer to the published guidelines (November 2009)</p>	<p>Amend0035 Amend0035</p>	<p><b>Manager's Response</b> Comments noted. Relevant sections of the Draft Development Plan require to be amended to reflect the issuing of the final Flood Risk Management Guidelines following publication of the Draft Plan.</p> <p><b>Manager's Recommendation</b> Amend the following Sections: 2.3.21, 2.3.22.i, 2.3.23, 2.3.25, 2.3.27.iii, and Appendix 2: to replace 'The Planning System and Flood Risk Management Consultation Draft Guidelines (2008)' with 'The Planning System and Flood Risk Management: Guidelines for Planning Authorities (2009)'</p>
<p><b>Comments which do not relate to any Proposed Amendment</b></p> <p>Comment regarding proposals for water abstraction from the</p>	<p>Amend0049 Amend0032</p>	<p><b>Manager's Response</b> The comments do not relate to specific changes to the Draft Development Plan proposed in any amendment and are therefore considered not to be relevant at this stage of the development plan review process.</p> <p><b>Manager's Recommendation</b></p>

<p>Liffey.</p> <p>Comments in relation to proposals for abstraction of water from the liffey valley and flood risk management.</p>		<p>No change recommended.</p>
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## Environmental Services

Proposed Amendment Ref.	Sub No	Manager's Response and Recommendations
<p><b>PA078</b></p> <p>Seeks the addition of 'and incineration' at the end of Section 2.4.1.</p>	<p>Amend0033</p>	<p><b>Manager's Response</b></p> <p>The Regional Waste Management Plan is the statutory statement of Waste Policy for the county.</p> <p><b>Manager's Recommendation</b> Amend PA078 to replace "landfill" with "waste disposal".</p>
<p><b>PA079</b></p> <p>Request that a caveat is included to clarify that Biological Treatment does not include MBT plants producing fuel for incineration.</p> <p>Contend the first bullet point in this section is superfluous as this matter is legislatively governed. To include such a point is to raise the question in every other section of the plan where the legislative requirement is not stipulated as to whether the plan's intent is to be contrary or selective with regard to the legislative requirement. This bullet point should therefore be deleted from section 2.4.2 Strategy for clarity and consistency</p> <p>Amendments welcomed.</p>	<p>Amend0033 Amend0033 Amend0035</p>	<p><b>Manager's Response</b></p> <p>The Regional Waste Management Plan is the statutory statement of Waste Policy for the county, and provides for the treatment of waste by incineration.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>PA080</b></p>	<p>Amend0028 Amend0028</p>	<p><b>Manager's Response</b></p> <p>The Regional Waste Management Plan is the statutory statement of</p>

<p>Requests that this amendment be removed because it is not consistent with Waste Management Plan for the Dublin Region 2005-2010 and therefore should not be included in South Dublin Development Plan.</p> <p>Requests that this amendment be removed because Industrial and healthcare facilities, including hospitals all used licensed hazardous waste contractors approved by the EPA for waste that requires incineration.</p> <p>Requests that this amendment be removed because the National Hazardous Waste Management Plan 2008-2012 adequately provides for the industrial and healthcare sector.</p> <p>Requests that this amendment be removed because the development plans of the other Dublin Authorities do not include any reference to facilitating industrial and healthcare companies, and it is clearly the remit of the EPA to determine the need for such facilities.</p> <p>Delete text reading "other than for industrial processes or health purposes" from proposed amendment to Section 2.4.3 Waste Management Strategy as it contradicts Incineration Policy elsewhere within the Plan.</p> <p>The move towards sustainable and considered waste management and away from incineration is to be commended</p> <p>Submit that this line is obviously a mistake and should be removed from the plan.</p> <p>Objects to the inclusion of the Council's objective that no commercial or publicly-controlled incinerator other than for</p>	<p>Amend0028 Amend0028 Amend0001 Amend0049 Amend0049 Amend0027 Amend0033</p>	<p>Waste Policy for the county, and provides for the treatment of waste by incineration.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
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<p>industrial processes or health purposes be built in South Dublin.</p> <p>Objects to the inclusion of wording that supports incineration for health and industrial waste within the County and requests that this wording be deleted. Seeks clarification on what waste plan and targets are being specified in the proposed amendment. Targets should be highlighted.</p>		
<p><b>PA081</b></p> <p>Proposes the re-introduction of the word 'further' into AMENDMENT REF. NO. PA081 as a solution to any concerns relating to current practices in the County so that the wording would be as follows; 'No further waste-to-energy incinerator or waste-to-energy thermal treatment facility will be situated in the County.'</p> <p>This section is positive and will have a beneficial effect on the move to waste minimisation and recycling.</p>	<p>Amend0028 Amend0049</p>	<p><b>Manager's Response</b> The Regional Waste Management Plan is the statutory statement of Waste Policy for the county, and provides for the treatment of waste by incineration.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>PA083</b></p> <p>Support for the replacing of 'composting' with 'biological treatment'.</p> <p>Request that a caveat is included to clarify that Biological Treatment does not include MBT plants producing fuel for incineration.</p>	<p>Amend0021 Amend0033</p>	<p><b>Manager's Response</b> The Regional Waste Management Plan is the statutory statement of Waste Policy for the county, and provides for the treatment of waste by incineration.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>

<p><b>PA086</b></p> <p>Welcome these sections and congratulate the Council on their commitment to avoiding the need to incinerate waste.</p>	<p>Amend0049</p>	<p><b>Manager's Response</b> The Regional Waste Management Plan is the statutory statement of Waste Policy for the county, and provides for the treatment of waste by incineration.</p> <p><b>Manager's Recommendation</b> That the proposed amendment be omitted from the Draft Development Plan.</p>
<p><b>PA087</b></p> <p>Support for the replacing of 'composting' with 'biological treatment'.</p> <p>Request that a caveat is included to clarify that Biological Treatment does not include MBT plants producing fuel for incineration.</p>	<p>Amend0021 Amend0033</p>	<p><b>Manager's Response</b> The Regional Waste Management Plan is the statutory statement of Waste Policy for the county, and provides for the treatment of waste by incineration.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>PA089</b></p> <p>Request that a caveat is included to clarify that Biological Treatment does not include MBT plants producing fuel for incineration.</p>	<p>Amend0033</p>	<p><b>Manager's Response</b> The Regional Waste Management Plan is the statutory statement of Waste Policy for the county, and provides for the treatment of waste by incineration.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>PA090</b></p> <p>We welcome the omission of the misnomer "waste to energy" option from this section. This will lead to actual recycling and waste minimisation efforts</p> <p>Request that a caveat is included to clarify that Biological Treatment does not include MBT plants producing fuel for</p>	<p>Amend0049 Amend0033</p>	<p><b>Manager's Response</b> The Regional Waste Management Plan is the statutory statement of Waste Policy for the county, and provides for the treatment of waste by incineration.</p> <p><b>Manager's Recommendation</b> That the proposed amendment be omitted from the Draft Development Plan.</p>

<p>incineration.</p>		
<p><b>PA092</b></p> <p>This new policy requires clarification regarding the scale of non-residential development and the requirement to submit a Waste Management Plan. This policy should make reference to the following national policy: 'Best Practice Guidelines on the preparation of Waste Management Plans for construction &amp; Demolition Projects' (June 2006) appropriate to the scale of Development. Note the thresholds for developing Waste Management Plans are different to those proposed in the policy. This policy could be expanded to include provision or incentives within the Development Plan to encourage identification of the recycled content of materials on planning submissions to illustrate the applicant's engagement with wider issues of sustainability.</p>	<p>Amend0046</p>	<p><b>Manager's Response</b>                  This requirement is welcome but should be extended to require that the Waste Management Plan for the site must be agreed with the Waste Authority prior to the commencement of Development.</p> <p><b>Manager's Recommendation</b>                  Amend PA092 to revise proposed section 2.4.18.iv PolicyES13A : Construction and Demolition Waste to read as follows:</p> <p>It is the policy of the Council to require that planning applications for development (apart from residential developments of less than 15 units) be accompanied by a Waste Management Plan which shall be agreed with the Waste Authority prior to the commencement of Development. The Plan, as a minimum, shall include a provision for the management of all construction and demolition waste arising on site, shall make provision for the recovery or disposal of this waste to authorised facilities by authorised collectors. Where appropriate, the re-use of excavated material from development sites on the site is to be encouraged, for landscaping, land restoration or for preparation for development.</p>
<p><b>PA094</b></p> <p>The compounds referenced for monitoring should also include those emitted from the IPCC and Seveso plants within the County.</p>	<p>Amend0033</p>	<p><b>Manager's Response</b>                  The air pollutants listed are consistent with the Regional Air Quality Management Plan as adopted by the Members of the Local Authority. Air Quality Standards Regulations 2002 sets out legislative standards for these air pollutants. These standards have been set with regard to scientific and medical evidence on the effects of the particular pollutant on health, or, in the appropriate context, on the wider environment.</p> <p>To ensure consistency with the AQMP, the reference should read "Nitrogen dioxide (NO2) and oxides of nitrogen (NOx)"</p> <p><b>Manager's Recommendation</b>                  Amend PA094 to read:</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 (SO<sub>2</sub>), Carbon Dioxide (CO<sub>2</sub>), Lead and Benzene, Nitrogen dioxide (NO<sub>2</sub>) and oxides of nitrogen (NO<sub>x</sub>).</p>
<p><b>PA0237</b></p> <p>Requests an amendment to Section 2.4.13 of the plan, other than as proposed in amendment PA237, to give more importance to the role of private waste operators in every aspect of waste management.</p> <p>Request that a caveat is included to clarify that Biological Treatment does not include MBT plants producing fuel for incineration.</p>	<p>Amend0021 Amend0033</p>	<p><b>Manager's Response</b> The Regional Waste Management Plan is the statutory statement of Waste Policy for the county, and provides for the treatment of waste by incineration.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>Comments which do not relate to any Proposed Amendment</b></p> <p>Consideration should be given to the High Court ruling on 21.12.2009 (Judge McKechnie V Dublin City Council.</p> <p>The plan should commit to the full restoration, impending closure and capping of the Arthurstown site.</p>	<p>Amend0021 Amend0021</p>	<p><b>Manager's Response</b> These comments do not relate to specific changes to the Draft Development Plan proposed in any amendment and are therefore not considered to be relevant at this stage of the development plan review process.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>

## Telecommunications and Energy

Proposed Amendment Ref.	Sub No	Manager's Response and Recommendations
<p><b>PA096</b></p> <p>Support for the amendments.</p>	<p>Amend0024</p>	<p><b>Manager's Response</b> Comment noted.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>PA097</b></p> <p>Objects to the requirement to undergrounding of all telecommunications cabling as it is an excessive and cost onerous requirement. Request that Policy EC1 be amended to reflect their concerns.</p>	<p>Amend0024</p>	<p><b>Manager's Response</b> The submission does not address the specific changes in the proposed amendment and is therefore not considered to be relevant at this stage of the development plan review process.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>PA099</b></p> <p>Significant concerns in relation to PA099 as the wording conflicts with the Governments Policy on Telecommunications and will prove an inhibitor for the efficient provision of a "smart economy" in the County.</p> <p>This amendment is inconsistent and unclear, and is not supported in national policy and health issues are not a relevant land use planning consideration.</p> <p>In relation to Kerry County Council, it has been proven that the refusal of telecommunications infrastructure based on</p>	<p>Amend0034 Amend0034 Amend0034 Amend0024 Amend0036 Amend0034 Amend0034 Amend0031 Amend0036 Amend0024 Amend0036 Amend0024</p>	<p><b>Manager's Response</b> 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</p>

exclusion zone policies are generally overturned on appeal by An Bord Pleanála.

Objects to the inclusion of the Kerry County Development Plan 2009 policy, which promotes exclusionary zones. Requests that this be deleted.

Objects to the inclusion of exclusion zone policies such as that of Kerry County Council.

The amended Draft Plan retains the policy of discouraging the location of antennas in residential areas and near primary and secondary schools and childcare facilities citing "protection of the health and well being of its citizens" as the reason for such discouragement. This is contrary to evidence found in the Irish Government's Expert Group on Health Effects of Electromagnetic Fields March 2007. It concluded that "no adverse short or long-term health effects have been found from exposure to RF signals produced by mobile phones and base station transmitters"

The amended Draft Plan retains the requirement to consult with educational facilities and adds a requirement to obtain agreement from management and parents. This is not based on any scientific evidence and would significantly undermine public confidence in the already tightly regulated public exposure limits. It also is acknowledged that this requirement would prove extremely onerous and has the capacity to delay rollout of infrastructure. The requirement for operators to ensure the "beam of greatest intensity" does not fall on educational facilities is not considered to be a factor for consideration by the Planning Authority.

Note the reference to the need to take into consideration

stations. Pending the issuing of new national guidelines it is considered that the draft Development Plan provisions as amended are satisfactory and consistent with the national guidelines, subject to the omission of the proposed amendment detailed in the Manager's Recommendation.

**Manager's Recommendation**

That the following text be deleted from the proposed amendment:  
 "That it is the policy of the Planning Authority that telecommunication masts shall not be located within 200m of any schools ; hospitals ; community centres or police stations, similar to Kerry Co Co"

<p>possible impacts on any existing public right of way on page 78 at the end of the 3rd pt in the list of pts. We wonder could you stretch a point and include the same wording in a policy? This would bring the plan into line with Meath 4.11.4 – page 191 –1st para –4th line &amp; DLR – 16.14 – last pt. Perhaps you could stretch a little bit further by adding: or walking routes to be consistent with 2.5.11 – Wind Energy 4th pt in list of pts.</p> <p>Request that the proposed insertions ('primary and secondary schools and childcare facilities' and 'that telecommunication masts shall not be located within 200m of any schools etc') as detailed fully in PA099 be deleted, or amended to reflect national planning guidelines.</p> <p>Request the omission of the bullet point that reads: "that the beam of greatest intensity from a base station does not fall...with the relevant body of the school or childcare facility..." as it is considered that its inclusion is motivated primarily by public concerns and its impact on young children, which are not within the remit of the Planning Authority.</p> <p>A request that the proposed insertion ('that the beam of greatest intensity...') as detailed fully in PA099 be deleted, or amended to reflect national planning guidelines.</p> <p>Request that Section 2.5.8 should be further amended to reflect the requirements of the Planning Authority role and the strategic direction provided by the Development Management Guidelines 2007.</p>		
<p><b>PA0100</b></p>	<p>Amend0018 Amend0046</p>	

<p>Request the inclusion of the concept of autoproduction and a framework for supporting applications by established and new commercial enterprises where autoproduction generation is sought and request the inclusion of the following objective: support existing and established businesses and industries who wish to use wind energy to serve their own needs subject to proper planning and sustainable development.</p> <p>This policy could be more focused including the provision for Map based assessments of renewable energy sources (existing and potential) to optimise utilisation, for example define appropriate location of wind turbines etc. Note the following document: "Planning &amp; Climate Change Coalition (October 2009) "Planning and Climate Change Coalition: Position Statement" published by the Town &amp; County Planning Association <a href="http://www.tcpa.org.uk">www.tcpa.org.uk</a> contains much detail regarding such mapping in addition to wider issues of climate change mitigation and planning for resilience.</p>		<p><b>Manager's Response</b> The submission regarding 'autoproduction' does not address the specific changes in the proposed amendment and is therefore not considered to be relevant at this stage of the development plan review process. It is noted that Class 56(c) of the Planning and Development Regulations 2008 (S.I. 235 of 2008) deems the provision of a single wind turbine within the curtilage of an industrial or business premises to be exempted development, subject to compliance with the relevant conditions and limitations.</p> <p>It is considered that section 2.5.9(a) as proposed is sufficient to adequately indicate the purpose and scope of the proposed policy regarding sustainable energy.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>PA0102</b></p> <p>Whilst the investigation of geothermal energy is laudable, this should not be tied into a requirement for residential development.</p> <p>Promotion of geothermal energy welcomed.</p>	<p>Amend0049 Amend0035</p>	<p><b>Manager's Response</b> Comments noted</p> <p><b>Manager's Recommendation</b> No change recommended</p>
<p><b>PA0104</b></p> <p>While we support this we wonder could you, in 4th pt in list of pts, add: and walking routes? This would be consistent with</p>	<p>Amend0031 Amend0035</p>	<p><b>Manager's Response</b> It is considered that the proposed amendment is worded reasonably and gives clear guidance.</p>



<p>2.5.11.</p> <p>Energy and Communications infrastructure in sensitive landscapes should also require Visual Impact Assessment to be carried out and that the Habitats Directive and EIA Directive requirements are addressed.</p>	<p>Section 2.5.15 provides for visual impact assessment of relevant projects. Policy LHA9 (section 4.3.7.vii) addresses the requirements under the Habitats Directive. As stated in Section 0.4.4 the submission of an Environmental Impact Statement will be required in accordance with the relevant regulations where it is considered that a proposed development would be likely to have significant effects on the environment.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
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## A BUSY PLACE

### Enterprise and Employment

Proposed Amendment Ref.	Sub No	Manager's Response and Recommendations
<p><b>PA106</b> The changes to policy EE10, taken in context with proposed amendment paragraph PA012 (Section 0.4.7) would appear to indicate that in the absence of a Local Area Plan, mixed-use development on EP1 zoned lands could be guided by a wide range of plans. Seeks clarification.</p>	<p>Amend0050</p>	<p><b>Manager's Response</b> Development within EP1 areas will be guided by policies and objectives contained within the Development Plan and Local Area Plans. Local Area Plans will be prepared for all EP1 areas within the County.</p> <p><b>Manager's Recommendation</b> No change recommended</p>
<p><b>PA107</b></p> <p>Add the following sentence to proposed amendment- 'Offices 100-1,000sq.m and Offices over 1,000sq.m will be Permitted in Principle in Citywest Business Campus recognising the public transport provision and long established office use in this location'</p> <p>Support the comment made in the Environmental Report in relation to this policy, any such development should be conditional on good public infrastructure being in place.</p> <p>This is a retrograde step. There is sufficient properly zoned land in the county to allow for offices in suitable areas without this measure.</p> <p>Recommend that large-scale employment -intensive uses be located primarily within areas served by existing or planned high quality transport infrastructure, particularly favouring development within public transport corridors and within higher order urban centres which will benefit from rail based</p>	<p>Amend0006 Amend0026 Amend0041 Amend0049</p>	<p><b>Manager's Response</b> Given the location of the EP2 lands within the County a balance will be required to promote appropriate development in close proximity to major public transport. The positive assessment of development within EP2 areas therefore will have to have regard to the site's accessibility to sufficient public transport and infrastructure provision. Notwithstanding the comments of the SEA that development of this kind should be located within 400 metres of a major public transport route, the wording of the policy is considered appropriate.</p> <p><b>Manager's Recommendation</b> No change recommended</p>

<p>public transport. NTA would not support the inclusion of this policy as it could undermine the objective to focus employment intensive uses in proximity to rail nodes and higher order urban centres- the proposal to provide offices of over 1,000sqm in EP2 zoned areas appears to be in conflict with the objective of relocating lower employment intensive uses to these areas and could undermine the ability to redevelop established areas, which seems to have formed the basis for rezoning of EP2 zoned lands in the first instance - recommend that the proposed amendment is not included in the development plan.</p>		
<p><b>PA109</b>                  Policy EE39: Restriction Area at Casement Aerodrome- area concerned is governed by the policy of the Department of Defence as a "no build area" and is the only military aerodrome in the state – norm applied to other airports not applicable – Casement is a military aerodrome, not an international airport.</p> <p>Department of Defence has no difficulty with entering into negotiations with the Council concerning the Restricted Area.</p> <p>Request that this amendment be deleted because Casement Aerodrome is not an international airport and is the only military airport in the country. Therefore standards applied to international airports are not relevant and the restrictions by the Department of Defence should be adhered to. State security should be an objective supported by the Council and should not be undermined by industrial development.</p> <p>All references to the previous 'no-development restriction' should be removed from the plan or amended in accordance with the adopted Council motions. Request that Policy EE39 be amended or omitted from the plan.</p>	<p>Amend0002                  Amend0028                  Amend0053                  Amend0054</p>	<p><b>Manager's Response</b>                  The changes proposed in PA109 related to nomenclature – specifically, references to 'Baldonnell Airport' have been changed to 'Casement Aerodrome' in order to be accurate and consistent. The comments of the Department of defence do not address the proposed amendment and as such cannot be taken into account. Notwithstanding this, the Council welcomes the willingness of the Department to enter into negotiations with the Council regarding the Restricted Area.</p> <p>The issue that discusses international and military airport standards does not specifically comment on the proposed change to the section of the plan and such cannot be taken into account.</p> <p>In the interest of consistency, is considered that Policy EE39 should be amended to reflect the change in Department of Defence policy (i.e. introduction of public safety zones) in relation to the previous 'no-development restriction' area.</p> <p><b>Manager's Recommendation</b>                  It is recommended that the wording of policy EE39 be amended to replace '<i>...again negotiate...</i>' with '<i>...continue to negotiate...</i>' and '<i>...with the aim of reducing the no-development restriction area..</i>' with '<i>...regarding</i></p>

		<p><i>restrictions at...'</i>. The amended policy would read as follows: <i>'It is the policy of the Council to continue to negotiate with the Department of Defence regarding restrictions at Casement Aerodrome, Baldonnell to that of norm at international airports generally, thus allowing some currently zoned lands to be opened up for use'</i>.</p>
<p><b>PA110</b> Policy EE39A: Casement Aerodrome- Security Consultation Zone. Council would be acting outside its remit to amend the Dept. of Defence policy to maintain the current restricted area of 400 metres.</p> <p>Policy EE39A: Casement Aerodrome - Security Consultation Zone- The Dept. of defence would be the lead organisation in any consultations and any application would be subject to agreement of the Department prior to any grant of permission</p> <p>Policy EE39A: Casement Aerodrome- Security Consultation Zone. Application of 'Standard Security Measures' does not apply to Casement unlike other civilian airports mentioned- any standard security measures being applied following a consultation would have to be agreed to by the Dept. and the Military authorities prior to a grant of permission.</p> <p>Policy EE39A: Casement Aerodrome - Security Consultation Zone. Department of Defence objects to the use of the phrase 'international best practice' –this is governed by the ICAO for civil aviation, this is not applicable to a military aerodrome and is at a relatively basic level. The Department would be prepared to accept a reference to 'best military practice'</p> <p>Welcomes, supports and notes amendment PA110</p>	<p>Amend0002 Amend0012 Amend0022 Amend0026 Amend0028 Amend0049 Amend0053 Amend0054</p>	<p><b>Manager's Response</b></p> <p>The Department of Defence is one of the prescribed bodies in any consultations for any relevant application. Any comment from these bodies will form an important part of any decision on the regulation of development in this area.</p> <p>Support for amendment has been noted.</p> <p>The request to rezone land located within the security zone relates specifically to zoning of land other than that proposed in PA228 and does not relate directly to a specific change to the plan and therefore cannot be considered.</p> <p>The wording of the amendment clearly reflects the relevant motions that were adopted by the elected members. The zoning of lands is a separate issue and consideration of the merits of zoning particular lands must be made on a case by case basis and having considered the proper planning and sustainable development of the county.</p> <p>Having examined and given full consideration to the substantive issues including the issues raised in the submissions, it is strongly recommended to the members that the position of the Council regarding the security zone around Casement Aerodrome should revert to that of the Draft Plan. This would result in the deletion of the new policy EE39A 'Casement Aerodrome – Security Consultation Zone', as put forward by Proposed Amendment PA110.</p>

Request that this amendment be deleted because Casement Aerodrome is not an international airport and is the only military airport in the country. Therefore standards applied to international airports is not relevant and the restrictions by the Department of Defence should be adhered to. State security should be an objective supported by the Council and should not be undermined by Industrial development.

Request that this amendment be deleted because Industrial development of these lands would reduce the amount of open space afforded to the villages of the Rathcoole and Newcastle. Currently the restrictions have enabled the villages to retain their village character as the scale, mass and height of development has been shaped by the requirements of the Department of Defence.

Request that this amendment be deleted because the area around Casement Aerodrome is not accessible by public transport and is not located along a public transport corridor. There is also no direct access onto the N7 for any proposed development in this site and any such access would not be allowed by the NRA.

Request that this amendment be deleted because we would question the need for more industrial development around this location as there is already an excess of vacant industrial units in the Greenogue industrial estate which is more than sufficient to meet the needs of industry

Request that this amendment be deleted because Industrial development around Casement Aerodrome would have a negative impact on river systems in the area, many of which are already highly polluted. It would also negatively impact on biodiversity corridors established in the area as the green belt established by the Aerodrome contracts due to development.

**Manager's Recommendation**

It is recommended that new policy EE39A 'Casement Aerodrome – Security Consultation Zone', as put forward by Proposed Amendment PA110 be deleted and that the position of the Council regarding the security zone around Casement Aerodrome should revert to that of the Draft Plan

<p>Objects to the policy as it opens up Casement Aerodrome for civilian use. Objects to on grounds of environmental impact. Concern relating to this section, the provision of a safety area and an exclusion area is a matter for the Irish Aviation Authority and, in the case of Casement Aerodrome, also for the Air and Defence Forces.</p> <p>The submission contends that the zoning of the land within the security consultation zone between Greenogue Business Park/Aerodrome Business Park and the Airfield on the western and southern sides should be changed in line with the rezoning proposed under PA228, reflecting the changes to the security zone restrictions at Casement Aerodrome under PA110.</p> <p>Support for this amendment.</p> <p>Requires a clear statement that the Department of Defence Security Zone Restriction around Casement Aerodrome has been amended to become a Security Consultation Zone. Contends that proposed amendments made to Policy EE39A are made up of incomplete parts of two different motions (Motions 239 and 242) and therefore 'dilutes' the thrust of the motions adopted. Requests that the policy be amended to reflect the motions adopted by the members of the Council.</p>		
<p><b>PA111</b> Support for the amendment proposed in reference no. PA111 With reference to policy EE40, the Council should not have a policy regarding the reclassification of runways Objects to the change of classification of Weston Executive Airport. A local authority has no role or function in the classification of airports and is therefore ultra vires. The amendment should be deleted.</p>	<p>Amend0009 Amend0010 Amend0047 Amend0049</p>	<p><b>Manager's Response</b> Support for the proposed amendment has been noted.</p> <p>Having considered the amendment in detail, it is not a function of the Planning Authority to classify any particular runway. This is a function of the Irish Aviation Authority and as such falls outside the remit of a County Development Plan.</p> <p><b>Manager's Recommendation</b> The classification should revert back to that issued by the Irish Aviation</p>

		<p>Authority and as detailed in the draft plan.</p>
<p><b>PA112</b></p> <p>Amend the proposed amendment to section 3.2.22 to replace the corresponding sentence with the following: "However, within the 'red zones', some development is permissible whereby the development could not reasonably expect to increase the number of people living at the property subject to the approval of the Department of Defence."</p> <p>Concern relating to this section; the provision of a safety area and an exclusion area is a matter for the Irish Aviation Authority and, in the case of Casement Aerodrome, also for the Air and Defence Forces.</p> <p>Support for this amendment.</p> <p>Requests that the criteria for determining the acceptability of development within the red zones should be in accordance with national and international best practice, as applied at Dublin, Cork and Shannon airports.</p>	<p>Amend0028 Amend0049 Amend0053 Amend0054</p>	<p><b>Manager's Response</b></p> <p>It is considered that given the need to secure safe air navigation within these particular areas, this would form a fundamental consideration in the event of any application within these 'red zones'. While the proposed amendment would appear to give flexibility in considering applications within the 'red zones' it is considered that, in practice, this would be very limited. The wording of the proposed amendment is considered appropriate and would be broad enough to account for a number of development proposals within the red zones rather than referring only to a specific land use.</p> <p>Notwithstanding the foregoing, it is considered that the phrase '<i>within the red zones, some development is permissible</i>' may convey a misleading presumption in favour of development. It is considered that replacement with the phrase '<i>within the red zones, some development may be permissible</i>' would more accurately express the position vis-à-vis development.</p> <p>With respect to the layout of the 'red zones' in the Draft Development Plan these are considered to accord with the appropriate international standards. It is incumbent on the Development Plan to clearly identify these zones.</p> <p>It is agreed that the provision of a safety area and an exclusion area is a matter for the Irish Aviation Authority.</p> <p>The support for the amendment has been noted.</p> <p><b>Manager's Recommendation</b></p> <p>In the interests of accuracy and clarity, it is recommended that the reference to '<i>Drawing – 'Safeguarding Map for Weston Aerodrome'.....</i>) be replaced with '<i>the Development Plan Index Map</i>'.</p>

		It is recommended that the phrase <i>'within the red zones, some development is permissible'</i> should be replaced with the phrase <i>'within the red zones, some development may be permissible'</i> .
<b>PA113</b>  Seeks further reduction to the proposed consultation distance for development proximate to the Irish Distillers and Tibbet & Britten Group sites (on the basis that the development potential of the Electrolux site could be adversely affected).	Amend0050	<b>Manager's Response</b> The consultation distances have been provided by the Health and Safety Authority (HSA) and further changes to these distances is not a matter for the Planning Authority.  <b>Manager's Recommendation</b> No change recommended
<b>Comments which do not relate to any Proposed Amendment</b>  Comment requesting modification of Draft County Development Plan Index Map/ Map 3 to reduce the area of the 'Security Consultation Zone' to approximately 300 metres from the edge of Runway 05/23.	Amend0022	<b>Manager's Response</b> These comments have been noted but as they do not relate directly to a specific change to the plan cannot be considered. The area of the 'security zone has been set out on the clear advice of the military authorities based on a threat assessment carried out by them.  <b>Manager's Recommendation</b> No change recommended

### Town, District and Local Centres

Proposed Amendment Ref.	Sub No	Manager's Response and Recommendations
<b>PA116</b> The historical conservation area should be renamed & appointed as the cultural quarter of the county town. There is no need to create a new "cultural" area. Request that the design statement for Tallaght village be further developed to ensure a 360 view is taken when adopting design cues. Seeks a Village Design Statement for Tallaght Village and the application of tenure mix to an area around Tallaght Village -	Amend0014 Amend0027	<b>Manager's Response</b>  The development and progression of Tallaght will be directed by the Tallaght Local Area Plan.  The cultural centre of Tallaght will be based around existing core cultural facilities such as the Theatre, the Arts Centre, the Big Picture and the Library. This area is easily accessible via major public transport facilities such as the Luas, Dublin Bus and, in the future, Metro West, and is



<p>having regard to rental accommodations schemes, minimum residential units, social housing, private housing, filling empty apartments, no more apartment development (to be explicitly stated in plan), develop Tallaght as a heritage village, a pedestrian friendly and cycle friendly village, retention of bus services, reuse of vacant buildings, take advantage of its prime location, retention of individual identity.</p>		<p>considered an important location within the County for the development, growth and the culture of the County Town and the area will help in the directional way forward for Tallaght.</p> <p><b>Manager's Recommendation</b> No change recommended</p>
<p><b>PA117</b></p> <p>Classifying Tallaght as an Education city is an excellent idea, however the attempt to tack on the redevelopment of the Citywest Institute cannot be allowed.</p>	<p>Amend0049</p>	<p><b>Manager's Response</b></p> <p>The facilitation and promotion of Tallaght town centre as an Education City with the objective of utilising the physical and educational infrastructure to provide for the education of international students in Tallaght town centre is to be welcomed. In conjunction with the facilities that Tallaght town centre has to offer such as the civic centre, which includes the theatre, Rua Red, the library; the retail centre located both in Tallaght Village and at the Square and the transportation infrastructural hub which links the Luas with buses and which will eventually link with Metro West the concept of an Education City would strengthen Tallaght town centre as a positive destination for students and all employment associated with education. It should be a policy of the Council to facilitate and promote Tallaght Town Centre as an Education City, building upon the existing Institute of Technology and the growth of educational provision within the town centre and in close proximity to the major transportation hub. In general the promotion of Tallaght as an Education City is considered to be reasonable and reflects an appropriate role for the development of Tallaght town centre, however, it is considered inappropriate to refer to individual sites.</p> <p><b>Manager's Recommendation</b></p> <p>It is recommended that the following section be removed from amendment PA117: "...and to provide for future development of City West Institute by facilitating development for education and residential buildings associated with City West Institute within the existing footprint of the buildings."</p>
<p><b>PA120</b></p> <p>Support for the inclusion of Lucan Village Design Statement policy and would support further initiatives for Rathcoole and</p>	<p>Amend0030 Amend0035 Amend0049</p>	<p><b>Manager's Response</b></p> <p>The proposed amendment to the plan as detailed under ref. no. PA123 makes it an objective of the Council to prepare Village Design Statements</p>

<p>Newcastle. Amend PA120 so that the new policy includes acknowledgement of and continued support for existing businesses within the Lucan Village area, including provision for their expansion and upgrading. PA120- should refer to the sustainable development of Lucan Village.</p>		<p>for each of the rural villages.</p> <p>The policy does not preclude the expansion and upgrading of existing businesses within Lucan and should therefore remain unchanged.</p> <p>The referral to sustainable development within this section of the plan is to be welcomed.</p> <p><b>Manager's Recommendation</b> Recommendation to amend: It is the policy of the Council to facilitate the preparation of a more strategic and forward looking vision and strategy for the future sustainable development of Lucan Village to address matters such as urban design, land-use, traffic management, environmental improvements and urban centre management, including:</p>
<p><b>PA122</b> Should refer to the sustainable development of Templeogue Village.</p>	<p>Amend0035</p>	<p><b>Manager's Response</b> The referral to sustainable development within this section of the plan is to be welcomed.</p> <p><b>Manager's Recommendation</b> Recommendation to amend: It is the policy of the Council to facilitate the preparation of a more strategic and forward looking vision and strategy for the future sustainable development of Templeogue Village to address matters such as urban design, land-use, traffic management, environmental improvements and urban centre management, including:</p>
<p><b>PA123</b> Requests that existing text in draft plan reading "The prime villages in the County include Rathcoole, Newcastle-Lyons and Saggart." be retained. Also insert "to be completed by 2011" after " each of the rural villages" in the proposed amendment.</p>	<p>Amend0028</p>	<p><b>Manager's Response</b> The amendment as detailed under ref. no. PA123 is considered reasonable and no changes are recommended.</p> <p><b>Manager's Recommendation</b> No change recommended</p>
<p><b>PA125</b></p>	<p>Amend0035</p>	<p><b>Manager's Response</b></p>

<p>Welcome any attempt to limit ribbon development and the blight of one-off housing. Any serviced sites that the Council prepares should be part of an existing consolidated development, with connections to mains water and sewerage and as part of a plan to develop an area. Any move in this regard should be subject to the normal public scrutiny and through the normal planning process. Including appropriate assessment. The use of Council land for this purpose must go through the full public consultation and the planning process. EPA – requests that the proposed amendment should not conflict with policies and objectives of the Draft Regional Planning Guidelines for the Greater Dublin Area 2010-2022</p>	<p>Amend0049</p>	<p>Comments noted, the wording of the amendment is considered appropriate.</p> <p><b>Manager's Recommendation</b> No change recommended</p>
<p><b>Comments which do not relate to any Proposed Amendment</b> Comment requesting amendments to Policy TDL34. Comment regarding the higher density development design strategy of Clonburris. Seeks the inclusion of an objective in the plan to help solve the problems associated with the Esso Site in Tallaght.</p>	<p>Amend0027 Amend0033 Amend0051</p>	<p><b>Manager's Response</b> There were a few comments that did not directly relate to specific changes in the text of the plan and did not form part of the amendments that went out to public consultation. Only comments that directly related to an amendment number were deemed valid. Therefore these comments, which do not relate to a specific amendment number, are not relevant at this stage of the plan process.</p> <p><b>Manager's Recommendation</b> No change recommended</p>

## Retail

Proposed Amendment Ref.	Sub No	Manager's Response and Recommendations
<p><b>PA126</b> Convenience stores (e.g. Spar, Centra), as envisaged by Section 3.4.3.iii in its description of Local Shops/Small Villages, would be unviable at 100sqM and also would not provide sufficient service to deter people from making car-born trips as opposed to walking to their local centre. They do</p>	<p>Amend0044 Amend0046</p>	<p><b>Manager's Response</b> The comment made in relation to local shops of 100m<sup>2</sup> not being viable is not relevant to the proposed amendment as it does not relate to any specific amendment to the plan.</p> <p>The support for the maximum size of a supermarket is noted.</p>

not fall under the 'discount' category. Support for the maximum size of a supermarket or discount foodstore being 1,500m<sup>2</sup>. Tesco Ireland strenuously opposed to this amendment, it would compromise future redevelopment/regeneration proposals at existing Tesco operations at Rathfarnham Shopping Centre and Hillcrest Shopping Centre in Lucan (Designated Local Centres) as well as other Local Centres which have the potential for redevelopment and rejuvenation. The amendment would cap convenience floorspace at the centres below existing levels, seriously undermining existing operations; the investment in the stores may be lost. Amendment proposes to further restrict provision of retailing and particularly foodstores at designated Level 4 Local Centres. The proposed amendment and other restrictive retail policies within the draft plan may result in the creation of a very restrictive retail planning framework within South Dublin and the approach would result in no policies being provided within the Development Plan to encourage the provision of convenience retail shopping facilities within established Local Centres. If adopted the amendment would undermine existing development and employment at Tesco Stores and prevent the future redevelopment / regeneration, it would encourage a continuous decline in the vitality and viability of established Local Centres, and seriously undermine the ability of retail operators to respond to demand for convenience retail floorspace in areas underserved by foodstore developments. GDA Retail Strategy states that "Councils should assess local centres (Level 4 and 5) to assess whether they need to change level and/or zoning policy to ensure their viability and that they meet the needs of the surrounding community"- the Retail Strategy does not provide a rigid retail planning framework and sufficient flexibility exists to provide for varying sizes of level 4 centres- the proposed amendment would act as a barrier to any future redevelopment at existing centres. The proposed amendment is not in accordance with the

The Retail Strategy for the Greater Dublin Area 2008-2016 states that Neighbourhood/Small Town/Village Centre should accommodate one supermarket or discount foodstore ranging in size from 1,000-2500m<sup>2</sup>. The proposed amendment, by changing the size to 1,000-1,500m<sup>2</sup>, would set the County Development Plan 2010-2016 contrary to national guidance. The national and regional guidance is considered to be reasonable and therefore the range of sizes of supermarkets should revert back to the figures as detailed in the draft development plan.

**Manager's Recommendation**

The range of size of supermarkets as detailed under Section 3.4.3.iii should revert back to the figures that were detailed in the draft development plan i.e. 1,000-2,500m<sup>2</sup>, in accordance with the Retail Strategy for the Greater Dublin Area.

<p>policy provisions of the GDA Retail Strategy- which outlines that Level 4 Neighbourhood Centres will normally provide for one supermarket or discount foodstore ranging in size from 1,000-2,500sqm while the proposed amendment proposes to introduce a floorspace cap of 1,000-1,500sqm. Proposed rewording " These centres usually provide for one supermarket or discount foodstore generally ranging in size from 1,000-2,500sqm with a limited range of supporting shops... "A general rule cannot be applied to all Level 4 Centres within South Dublin. A number of Level 4 Centres provide for foodstores in excess of 2,000sqm and, therefore cater for a wider catchment area than neighbourhood centres. Proposals for increased retail floorspace at these locations will be considered on a case by case basis." Propose there is scope to provide a "bespoke/hybrid zoning objective applied to Local Centres to ensure that a blanket approach is not applied to all Level 4 Local Centres.</p>		
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## A PROTECTED PLACE

### Archaeological and Architectural Heritage

Proposed Amendment Ref.	Sub No	Manager's Response and Recommendations
<p><b>PA132</b>                      Comment in relation to flood lighting the Ballymount Gatehouse.</p> <p>Comment regarding the inclusion in the RPS of all structures listed with regional significance in the database of the National Inventory of Architectural Heritage.</p>	<p>Amend0014                      Amend0033</p>	<p><b>Manager's Response</b>                      The Planning Authority can assess the content of, and the evaluations in, an NIAH survey with a view to the inclusion of structures in the RPS according to the criteria outlined in <i>Architectural Heritage Protection, Guidelines for Planning Authorities</i>. Where an NIAH survey has been carried out, those structures which have been attributed a rating value of international, national or regional importance in the inventory will be recommended by the Minister to the planning authority for inclusion. Should a planning authority, following consideration, decide not to comply with a ministerial recommendation, it is obliged to inform him in writing of the reason for this decision. A survey of these structures was carried out, and those of importance were included in the RPS.</p> <p>It is not considered appropriate at this stage in the Development Plan process to discuss individual protected structures which do not relate to a proposed amendment number.</p> <p><b>Manager's Recommendation</b>                      No change recommended.</p>
<p><b>PA133</b>                      Support this amendment.</p>	<p>Amend0031</p>	<p><b>Manager's Response</b>                      Comments noted.</p> <p><b>Manager's Recommendation</b>                      No change recommended.</p>
<p><b>PA134</b></p>	<p>Amend0049</p>	<p><b>Manager's Response</b></p>

<p>It is a welcome to see that the Council is moving to protect both archaeological and recorded monuments as well as the environs and settings for these monuments.</p>		<p>Comments noted.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>PA135</b></p> <p>Propose that the full expanse of weirs, mills and cottages on the river Liffey should be designated an Architectural Conservation area(s), ACA in particular recognition of their historical, cultural, technical and social interest</p>	<p>Amend0032</p>	<p><b>Manager's Response</b></p> <p>It is not considered appropriate at this stage in the Development Plan process to discuss proposals for new Architectural Conservation Area(s) as these proposals do not relate to a proposed amendment number.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>

**Landscape Natural Heritage and Amenities**

Proposed Amendment Ref.	Sub No	Manager's Response and Recommendations
<p><b>PA136</b></p> <p>Support this amendment.</p> <p>Comment in relation to motions proposed which do not feature as proposed amendments.</p>	<p>Amend0031 Amend0032</p>	<p><b>Manager's Response</b></p> <p>Support noted.</p> <p>All motions agreed as per minutes of the Development Plan meetings in May 2010 have been included in the Proposed Amendment document that was out on public display in June 2010. The views of the manager have been expressed with regard to the relevant substantive amendment</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>PA137</b></p>	<p>Amend0031</p>	<p><b>Manager's Response</b></p>

<p>Support this amendment.</p> <p>This is a very short list of Views and Prospects for a county that has such a range of natural attractions. The Council does not appear to value the views and prospects in its county</p>	<p>Amend0049</p>	<p>Support noted.</p> <p>At the Council Meetings in May 2010, it was agreed that the issue of Views and Prospects would be deferred to the Planning and Economic Development Strategic Policy Committee.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>PA138</b></p> <p>Support this amendment.</p> <p>Comments on the listing of herb-flora species</p> <p>Amendment is welcomed.</p>	<p>Amend0031 Amend0032 Amend0035</p>	<p><b>Manager's Response</b> Support noted.</p> <p>It is not considered appropriate at this stage in the Development Plan process to discuss proposals for the listing of Herb-Flora Species as these proposals do not relate to a proposed amendment number.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>PA139</b></p> <p>Suggest that you should reconsider the time limit of "during the lifetime" provided for in each of these policies. Would you consider three years of adoption? These policies are all carried forward from the 2005 Plan (and maybe from Plans prior to that.) This means that it could be as long as 12 years before any further progress is made.</p> <p>We submit that you should delete "and subject to available resources". There are many other policies in the Plan which will require to be funded. We submit you that shouldn't single out these policies.</p>	<p>Amend0031</p>	<p><b>Manager's Response</b></p> <p>The Planning Department endeavours to carry out all objectives of the Development Plan. Where a timeframe has been put on a policy, it is considered that the Council will, subject to resources carry out the work within this timeframe.</p> <p><b>Manager's Recommendation</b> No change recommended</p>
<p><b>PA140</b></p> <p>Suggest that you should reconsider the time limit of "during</p>	<p>Amend0031</p>	<p><b>Manager's Response</b></p> <p>The Planning Department endeavours to carry out all objectives of the Development Plan. Where a timeframe has been attached to a policy, it is</p>



<p>the lifetime" provided for in each of these policies. Would you consider three years of adoption? These policies are all carried forward from the 2005 Plan (and maybe from Plans prior to that.) This means that it could be as long as 12 years before any further progress is made.</p> <p>We submit that you should delete "and subject to available resources". There are many other policies in the Plan which will require to be funded. We submit you that shouldn't single out these policies.</p>		<p>considered that the Council will, subject to resources carry out the work within this timeframe.</p> <p><b>Manager's Recommendation</b> No change recommended</p>
<p><b>PA141</b></p> <p>Suggest that you should reconsider the time limit of "during the lifetime" provided for in each of these policies. Would you consider three years of adoption? These policies are all carried forward from the 2005 Plan (and maybe from Plans prior to that.) This means that it could be as long as 12 years before any further progress is made.</p> <p>We submit that you should delete "and subject to available resources". There are many other policies in the Plan which will require to be funded. We submit you that shouldn't single out these policies.</p>	<p>Amend0031</p>	<p><b>Manager's Response</b> The Planning Department endeavours to carry out all objectives of the Development Plan. Where a timeframe has been put on a policy, it is considered that the Council will, subject to resources carry out the work within this timeframe.</p> <p><b>Manager's Recommendation</b> No change recommended</p>
<p><b>PA142</b></p> <p>Suggest that you should reconsider the time limit of "during the lifetime" provided for in each of these policies. Would you consider three years of adoption? These policies are all carried forward from the 2005 Plan (and maybe from Plans prior to that.) This means that it could be as long as 12 years before any further progress is made.</p>	<p>Amend0031</p>	<p><b>Manager's Response</b> The Planning Department endeavours to carry out all objectives of the Development Plan. Where a timeframe has been put on a policy, it is considered that the Council will, subject to resources carry out the work within this timeframe.</p> <p><b>Manager's Recommendation</b></p>

<p>We submit that you should delete "and subject to available resources". There are many other policies in the Plan which will require to be funded. We submit you that shouldn't single out these policies.</p>		<p>No change recommended</p>
<p><b>PA143</b> Suggest that you should reconsider the time limit of "during the lifetime" provided for in each of these policies. Would you consider three years of adoption? These policies are all carried forward from the 2005 Plan (and maybe from Plans prior to that.) This means that it could be as long as 12 years before any further progress is made.</p> <p>We submit that you should delete "and subject to available resources". There are many other policies in the Plan which will require to be funded. We submit you that shouldn't single out these policies.</p> <p>The Council should look to expand its policy's horizons past the bounds of this report and provide real protection for the valley; which is one of Dublin's natural treasures.</p>	<p>Amend0031 Amend0049</p>	<p><b>Manager's Response</b></p> <p>The Planning Department endeavours to carry out all objectives of the Development Plan. Where a timeframe has been put on a policy, it is considered that the Council will, subject to resources carry out the work within this timeframe.</p> <p>It is considered that there are sufficient policies in place to protect the amenity that is the Liffey Valley.</p> <p><b>Manager's Recommendation</b> No change recommended</p>
<p><b>PA144</b> Policy LHA9 Impacts on Natura 2000 Sites is legally incorrect at law as it does not fully reflect the provisions of Article 6 of the Habitats Directive in that it does not have regard to Article 6(3).</p> <p>Concern in relation LHA9. It is recommended that the proposed policy should be reviewed and redrafted so as to fully reflect and be consistent with the relevant provisions of the European Communities (Natural Habitats) Regulations,</p>	<p>Amend0003 Amend0040</p>	<p><b>Manager's Response</b></p> <p>Comments are noted. Having considered the submissions and the overall policy it is considered that in the interests of clarity that the proposed wording be included 'Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. This wording to be included before the sentence starting with 'Projects noted within....</p>

<p>1997 ( S.I. No 94 of 1997).</p>		<p>The above wording is considered to be the most relevant wording and is taken directly from Article 6(3) of the Habitats directive. The substantive policy LHA9 remains unchanged.</p> <p><b>Manager's Recommendation</b>                  In the interests of clarity insert the following wording in place of proposed amendment:                  Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects , shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives.' This wording to be included before the sentence starting with 'Projects noted within...</p>
<p><b>PA145</b>                   Support this amendment</p>	<p>Amend0031</p>	<p><b>Manager's Response</b>                  Comments noted. The views of the manager have been expressed with regard to the relevant substantive amendment</p> <p><b>Manager's Recommendation</b>                  No change recommended.</p>
<p><b>PA146</b>                   Support this amendment                   Request deletion of all references to the Dublin Mountain Area, Mountains Area or Development Plan Zoning Objective H from the Policy LHA13.</p>	<p>Amend0031                  Amend0017</p>	<p><b>Manager's Response</b>                  Policy LHA13 is a specific policy for the Liffey Valley, High Amenity or Mountain areas, it would therefore be inappropriate to delete any reference to the Dublin Mountain Area, Mountains Area or Development Plan Zoning Objective H. These are environmentally sensitive areas within the County, and the Council aims to protect their sensitive landscapes.</p> <p>The amendment (PA146) to this policy proposed to add the Liffey Valley to the areas listed, it is therefore not considered appropriate at this time to comment on any other part of this policy which it should be noted has been adopted at the Draft Plan Stage The views of the manager have been expressed with regard to the relevant substantive amendment</p>

		<p><b>Manager's Recommendation</b> No change recommended</p>
<p><b>PA148</b>  Support this amendment</p>	<p>Amend0031</p>	<p><b>Manager's Response</b> Comments noted.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>PA149</b>  Amendment is welcomed.</p>	<p>Amend0035</p>	<p><b>Manager's Response</b> Comments noted.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>PA151</b>  Support this amendment</p>	<p>Amend0031</p>	<p><b>Manager's Response</b> Comments noted.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>PA152</b>  Welcome this proposal, but we submit that it fails to acknowledge the importance of the Canal for recreation – in particular walking and cycling. The absence of a positive attitude to cycling by Waterways Ireland has always been greatly disappointing. Of course, we totally oppose any proposal, other than provision of a cycleway, which would impinge on the tow path and the hedgerows and trees bordering the canal must be protected. We submit therefore that you should delete on 3rd line primarily as a natural</p>	<p>Amend0031 Amend0049</p>	<p><b>Manager's Response</b></p> <p>It is considered, as a result of the issues raised, that the proposed amendment is not necessary and should be deleted. Policies LHA8 and LHA22 adequately addresses the concerns raised in these issues.</p> <p>Policy LHA22 states that "It is the policy of the Council to protect and enhance the visual, recreational, environmental (flora/fauna/biodiversity) and amenity value of the Grand Canal (pNHA), its towpaths, adjacent wetlands, and associated habitats and to facilitate the provision of a cycleway on one side in association with Waterways Ireland. All development</p>

<p>biodiversity resource and substitute both as a natural biodiversity resource and as a recreational resource (particularly for walking and cycling).</p> <p>We would reference the devastation visited upon the Grand Canal in the creation of a cycling and pedestrian route. We hope that policy LHA22 will remind the Council of the requirement to preserve the Grand Canal pNHA and its biodiversity, which includes a number of species protected under both the Habitats and Birds Directives</p>		<p>proposals adjoining the Grand Canal should be accompanied by a Biodiversity Action Plan, including mitigation measures, where appropriate.”</p> <p>Policy LHA8 Special Areas of Conservation and proposed Natural Heritage Areas states that “It is the policy of the Council to protect and preserve areas designated or proposed as Special Areas of Conservation (E.U Habitats Directive) and proposed Natural Heritage Areas.”</p> <p>It is also noted that the proposed amendment would conflict with the purpose of SLO 6, SLO 28 and proposed SLO Grand Canal- Hazelhatch, which all promote the Grand Canal as a recreational and natural amenity.</p> <p><b>Manager’s Recommendation</b> It is recommended to delete PA 152 “It is an objective of the Council, in the light of the extensive development experienced by the county in recent years and the fragmentation of habitats and loss of natural wilderness, the Canal will be seen primarily as a natural biodiversity resource within the county, and any recreational amenity proposed shall not compromise that primary objective. Any recreational amenity proposals should be set well back from the canal edge, so as not to impose on the riparian edge or associated hedgerows and the rural idyll that the naturalised setting presents. All proposals shall be thoroughly assessed in accordance with European and Irish legislative requirements and considered in the light of their biodiversity impacts prior to any decision on permission.”</p>
<p><b>PA153</b></p> <p>Support this amendment.</p>	<p>Amend0031</p>	<p><b>Manager’s Response</b> Comments noted.</p> <p><b>Manager’s Recommendation</b> No change recommended.</p>
<p><b>PA155</b></p>	<p>Amend0031 Amend0033</p>	<p><b>Manager’s Response</b> Comments noted.</p>

<p>Support this amendment.</p> <p>Comment regarding the linking of the Liffey Valley with the Wicklow Way.</p>		<p>Manager's Recommendation</p>
<p><b>PA156</b></p> <p>Support this amendment.</p>	<p>Amend0031</p>	<p><b>Manager's Response</b> Comments noted.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>PA157</b></p> <p>Welcomes greater protection of the Liffey Valley.</p> <p>Appears to be correct.</p>	<p>Amend0049 Amend0032</p>	<p><b>Manager's Response</b> Comments noted. At the meetings in May 2010, the Council Members were advised that the introduction of another zoning would add further complexity to the Development Plan without any real effective increase in protection to already highly protected lands. This remains the strong advice of the Manager. Furthermore the attendant changes to the Draft plan on foot of those motions could result in a series of unintended consequences to the Plan.</p> <p><b>Manager's Recommendation</b> It is recommended that the Liffey Valley lands revert back to their original zoning Objective 'G'.</p>

## LOCAL ZONING OBJECTIVES

Proposed Amendment Ref.	Sub No	Manager's Response and Recommendations
<p><b>PA160</b></p> <p>In relation to the reclassification of zoning land at Greenogue from EP2 to EP3 point out that these locations do not have good access to the major road network as required by the EP3 classification.</p>	<p>Amend 0028</p>	<p><b>Manager's Response</b></p> <p>This proposed amendment reflects the zoning as set out and was included to correct a typographical error in the Draft Plan.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>PA161</b></p> <p>Requests amendment to proposed new LZO to amend cap on number of hotel bedrooms from 150 to 200 to ensure the provision of a 4 star hotel as opposed to a 3 star hotel. This amendment would not require any additional floor area or additional height.</p> <p>Justification should be given regarding the need for a proposed hotel complex as part of the proposed Spawell, Templeogue- Mixed Use Development.</p>	<p>Amend0039 Amend0035</p>	<p><b>Manager's Response</b></p> <p>This proposed amendment reflects an existing LZO and a current grant of permission on this site. It is considered that, as drafted, the LZO is reasonable in the context of the location of the site and the lack of other such facilities in the general area to the east of the M50</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>PA163</b></p> <p>This proposal would require clarification and an EIS. The creation of a marina at Hazelhatch could be very detrimental to the area. We would not be in favour of this.</p> <p>Objects to the inclusion of the LZO as it would result in major damage to the canal.</p>	<p>Amend0049 Amend0033 Amend0035</p>	<p><b>Manager's Response</b></p> <p>On the basis of the submissions received and the views expressed by the Manager that such a proposal is removed from the core of the county, it is considered that this LZO should be removed.</p> <p><b>Manager's Recommendation</b></p>

<p>EPA – requests that the proposed amendment should not conflict with policies and objectives of the Draft Regional Planning Guidelines for the Greater Dublin Area 2010-2022</p>		<p>Removal of New LZO- Amendment Ref. No. PA163 Hazelhatch-Residential Marina Village.</p>
<p><b>PA164</b> EPA – requests that the proposed amendment should not conflict with policies and objectives of the Draft Regional Planning Guidelines for the Greater Dublin Area 2010-2022</p>	<p>Amend0035</p>	<p><b>Manager's Response</b> It is considered that the proposed amendment does not conflict with the Policies/Objectives in the Draft Regional Planning Guidelines for the greater Dublin Area 2010-2022.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>



## SPECIFIC LOCAL OBJECTIVES

Proposed Amendment Ref.	Sub No	Manager's Response and Recommendations
<p><b>PA0180</b></p> <p>The NRA maintains its view that Specific Local Objectives 58 and 59 are inappropriate in view of their implications for the capacity, efficiency and operation of the N7 in the area.</p>	<p>Amend 0023</p>	<p><b>Manager's Response</b></p> <p>Comments noted, however the proposed amendment relates to the addition of text relating to flood risk assessment in SLO 58 and therefore, these comments, at this stage of the Development Plan process, are deemed invalid.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>PA183</b></p> <p>This objective may have implications on the locality. We are opposed to this in principle.</p>	<p>Amend0049</p>	<p><b>Manager's Response</b></p> <p>Any development at this location will be subject to assessment under the normal planning process, be open to public consultation and as set out will have to take cognisance of the importance of the biodiversity and existing environment at this location.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>PA184</b></p> <p>NRA agreeable to liaise further with the Council, though there is a presumption against re-openings considering the upgrade of the N4 Lucan Bypass and potential traffic and safety implications.</p>	<p>Amend0023</p>	<p><b>Manager's Response</b></p> <p>The former connections to the N4 from Tandy's Lane and Esker Lane were closed as part of the recently completed major upgrade to the N4 / Newcastle Road junction. It is considered that any re-instatement of these connections would reduce the capacity of the newly upgraded N4 and would conflict with the road safety improvement objectives of the upgrade scheme. It also should be noted that as set out in the Environmental Report serious environmental concerns are raised in respect of the proposed amendment, in particular that the proposal would allow for the</p>

		<p>reopening of access/egress onto the N4, which would increase traffic movements within Lucan Village and impact on residential amenity. The comments of the NRA are noted and supported.</p> <p><b>Manager's Recommendation</b> It is recommended that this Proposed Amendment be omitted from the Plan.</p>
<p><b>PA188</b></p> <p>Whilst we agree with the creation of a masterplan to dictate the development of an area, we note that there are a number of worrying phrases in this SLO such as: community gain. Concerns include already zoned land, pNHA, and reference to the 12th Lock should be removed.</p> <p>Support for proposed new SLO – 12th Lock Masterplan subject to the following changes: • The Grand Canal Way should be developed on the north side from the 12th Lock westward to Hazelhatch but not on the south side • The introduction of a traffic control facility for cyclists safety at the 12th Lock Bridge • The inclusion of the 3-storey mill building should be included within the list of Protected Structures • The Grand Canal should not be used as a flood relief route.</p> <p>Amend the first bullet point to exclude both references to the Grand Canal. Include a caveat to the second bullet point to ensure the impacts from any restoration work etc are not allowed to impact on the pNHA or the protected habitats and species of the Grand Canal.</p> <p>Attention drawn to the requirements under the SEA and Habitats Directives with regard to screening for significant environmental effects.</p>	<p>Amend0049 Amend0045 Amend0033 Amend0035</p>	<p><b>Manager's Response</b></p> <p>Numerous policies within the Draft Plan give significant protection to the Grand Canal and associated biodiversity corridors, namely the amendment proposed to Policy <b>LHA22</b> Protection of the Grand Canal, along with increased protection of species and habitats contained within Policy <b>LHA19</b> Flora and Fauna. These policies will be paramount when creating a masterplan for the 12<sup>th</sup> Lock as set out in <b>PA188</b>. This proposed amendment, as currently worded, is considered reasonable.</p> <p>All plans and projects will be required to be screened for possible impact on Natura 2000 sites. SDCC undertakes to fulfil obligations under Article 6(3) of the Habitats Directive as listed in PA144(LHA9)</p> <p><b>Manager's Recommendation</b> No change recommended.</p>

<p><b>PA195</b></p> <p>Request consultation with and approval of NRA prior to Council proposing any measures affecting N4 National Primary Route.</p> <p>Requests that the proposed amendment be omitted as following completion of the M50 and N4 road improvement works, traffic flows on the N4 are such that it is not possible to develop a new access from the N4 directly into the Liffey Valley Town Centre area, and the new free flow arrangements on the N4/M50 means there is no longer congestion and the cause of rat running through Palmerstown has been eliminated.</p>	<p>Amend0023 Amend0048</p>	<p><b>Manager's Response</b></p> <p>It is considered that the provision of this route is not necessary in the context of traffic management, considering the view expressed by the Manager that there were significant engineering and safety reasons why the proposed access/egress would not be possible or desirable. Also with regard to the Environmental Report Liffey Valley Town Centre is located along the future routes of Metro West and the Lucan LUAS, providing significant public transport connectivity to surrounding areas and the region. Increasing car based movements would undermine the attempts to encourage and facilitate public transport movements, thereby increasing transport emissions and car dependency. The comments of the NRA are noted and supported.</p> <p><b>Manager's Recommendation</b></p> <p>It is recommended that this Proposed Amendment be omitted from the Plan.</p>
<p><b>PA197</b></p> <p>Proposed heritage centre for the Dodder Valley should be amended to be located at Old Bawn weir to maximise the access to / from the centre &amp; to leverage from existing retail, parking, access and historical activities &amp; amenities</p> <p>If done sensitively, this could be an excellent idea.</p>	<p>Amend0014 Amend0049</p>	<p><b>Manager's Response</b></p> <p>The SLO provides for the Council to support the development of such an amenity, at a suitable location, which will be examined in conjunction with an overall proposal for the amenity. Support for the proposal noted.</p> <p><b>Manager's Recommendation</b></p> <p>No change recommended- The amendment, however should read, in accordance with the minutes of the Council Meeting of 13<sup>th</sup> May 2010.</p> <p>Tourism Amenity- Dodder Valley Support the development of a visitor centre/tourism amenity based on the historical mills that were a feature of the area, at a suitable location on the Dodder at Tallaght and have regard to the potential impacts on biodiversity and wildlife that such a development may have.</p>

<p><b>PA198</b></p> <p>While we support this we submit that at the very least you should provide that action plan should be completed within the lifetime of the Plan. This then would be consistent with 139-143.</p>	<p>Amend0031</p>	<p><b>Manager's Response</b></p> <p>It is inherent in the Development Plan that it is the intention of the Council to complete all policies and objectives within the lifetime of the Plan; however all are subject to the availability of resources.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>PA199</b></p> <p>The amendment as proposed in the adopted motion on LAP for Fortunestown Way provided that the LAP was "to commence within 6 months of the adoption of the new County Development Plan". This time limit should be reflected in the adoption of the new county development plan.</p>	<p>Amend0005</p>	<p><b>Manager's Response</b></p> <p>It is considered that the preparation of this plan will be carried out in a timely fashion subject to resources available.</p> <p><b>Manager's Recommendation</b> No changes recommended.</p>
<p><b>PA200</b></p> <p>Proposal located in a Green Belt and nursing homes are only open for consideration in existing premises under this zoning.</p>	<p>Amend0026</p>	<p><b>Manager's Response</b></p> <p>Given the Managers response to the motion, the submissions received and the fact that the environmental assessment noted that the proposed SLO may result in negative environmental impacts on car based emissions and car dependency it is considered that the proposed amendment should be omitted.</p> <p><b>Manager's Recommendation</b> It is recommended that the proposed amendment PA200 be omitted in order to prevent potential for negative impacts.</p>
<p><b>PA201</b></p> <p>This is confusing; we hope that any further development will be subject to the normal planning process and scrutiny.</p> <p>Seeks clarification whether or not there is a 'revised' site development brief for Monastery Road and if not, requests</p>	<p>Amend0049 Amend0052</p>	<p><b>Manager's Response</b></p> <p>The SLO sets out that any further development of these lands shall be subject to a revised brief to be approved at a later date, it is not considered appropriate to amend this SLO as suggested, any development on this site will be subject to the normal planning process and any revised site development brief.</p>

<p>that the wording of the SLO be amended to read "...shall be subject to a revised Site Development Brief..." Seeks clarification on what are the changed circumstances that would require a revised development brief and contends that it is unnecessary to prepare a new brief. Objects to the 'vague' reference "to be approved at a later date by South Dublin County Council" as it gives rise to uncertainty. Requests therefore that the SLO be amended as follows: The following mixed uses to be permitted in principle: residential, community facility, crèche, enterprise centre, health centre, offices in excess of 100m2, recreational facility and shop-neighbourhood. Development proposals for the lands to be subject to 'Lands at Monastery Road Site Development Brief' approved by the Council in November, 2007, or to an amended development brief to be agreed with the planning authority during the planning application process.</p>		<p><b>Manager's Recommendation</b> No change recommended.</p>
<p><b>PA203</b></p> <p>Request for an amendment of PA203 to add the following sentence at the end of the proposed new SLO: Applications for minor development, such as small extensions to houses, and most changes of use of existing buildings and or extensions and additions to existing commercial and industrial enterprises, are unlikely to raise significant flooding issues, and will therefore be acceptable in principle subject to appropriate flood risk assessment and mitigation, where necessary.</p> <p>Current and future land zoning and development should have regard to the finding of the current and future flood risk assessment studies to be conducted to identify vulnerable areas and promote appropriate land use in all instances.</p> <p>Reference to Dodder CFAMS noted, consideration should be given to amending the first paragraph as follows "...floodplain</p>	<p>Amend0030 Amend0035</p>	<p><b>Manager's Response</b></p> <p>It is not considered appropriate to prejudge whether certain applications would or would not be likely to raise significant flooding issues, or to accept that such developments in areas at risk of flooding, would be acceptable in principle. It is considered to be inherent in the SLO that such maps will be taken into account when assessing all planning applications. A local Authority is obliged to consider the findings of any appropriate Flood Risk Assessments and it is considered that this SLO addresses the issue of promoting appropriate land use adequately.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>

<p>maps are to be integrated into any planning decision, where appropriate along with..." (removal of the text taken into account).</p>		
<p><b>PA204</b></p> <p>Submit that you should include cycleways.</p> <p>Objects to the inclusion of the SLO as it would result in major damage to the canal.</p>	<p>Amend0031 Amend0033</p>	<p><b>Manager's Response</b></p> <p>Any such development would be subject to the development of a sustainable strategy for the Grand Canal and be subject to the approval of Waterways Ireland which would seek to address any concerns regarding damage to the Canal, it is considered appropriate to include reference to cycleways in the SLO.</p> <p><b>Manager's Recommendation</b> Amend PA204 to read "facilitate the development of the Grand Canal at Hazelhatch as a location for water based activities, walking trails and cycle routes between Dublin and Kildare...."</p>
<p><b>PA206</b></p> <p>Note this objective and state that RPA are willing to engage with SDCC in this matter.</p>	<p>Amend0029</p>	<p><b>Manager's Response</b></p> <p>Comments noted.</p> <p><b>Manager's Recommendation</b> No change recommend.</p>
<p><b>PA207</b></p> <p>Requests consultation with and approval of NRA prior to Council proposing any measures relating to Boot Road that would affect the Newlands Cross Junction Upgrade scheme.</p>	<p>Amend0023</p>	<p><b>Manager's Response</b></p> <p>Comments noted.</p> <p><b>Manager's Recommendation</b> No change recommended.</p>

# SCHEDULES

## SCHEDULE 3 DEFINITION OF USE CLASSES

Proposed Amendment Ref.	Sub No	Manager's Response and Recommendations
<p><b>PA210</b></p> <p>The RIAI Proposes a revision to amendment PA210 as follows: Shop – Neighbourhood This category includes smaller shops giving a localised service in a range of retail trades or businesses, such as butcher, grocer, newsagent, hairdresser, ticket agency, dry cleaning or launderette, and designed to cater for normal neighbourhood requirements. It also includes a small supermarket on a scale directly related to the role and function of the settlement and its catchment, and not exceeding 1500sqM in gross floor area.</p>	Amend0046	<p><b>Manager's Response</b> The wording of the definition is considered to be reasonable and no changes are deemed to be necessary.</p> <p><b>Manager's Recommendation</b> No change recommended</p>

## SCHEDULE 4 CASEMENT AERODROME

Proposed Amendment Ref.	Sub No	Manager's Response and Recommendations
<p><b>PA211</b></p> <p>Welcomes, supports and notes amendment PA211 Item 2- it is the policy of the Dept. of Defence regarding the distance within which no development is allowed on lands lying under the approaches to runway 05/23 is 1,350 metres- the Dept. to continue to ensure that this is enforced.</p>	Amend0002 Amend0022 Amend0028 Amend0033 Amend0037 Amend0053 Amend0054	<p><b>Manager's Response</b></p> <p>The support for and objections to the proposed amendment have been noted.</p> <p>Having examined and given full consideration to the substantive issues including the issues raised in the submissions, it is firmly considered that</p>

<p>Objects to the change in height restriction in the vicinity of Casement and other changes that facilitate the rezoning of land along the Naas Road and request that these amendments be deleted.</p> <p>Support for this amendment to Schedule 4.</p> <p>Amend the proposed amendment to section 2 of the Explanatory Note to Schedule 4 to replace the corresponding sentence with the following: "However, within the 'red zones', some development is permissible whereby the development could not reasonably expect to increase the number of people living at the property subject to the approval of the Department of Defence."</p> <p>Request modification to text on page 266 of Draft Plan in the interests of clarity to read: "Casement Aerodrome is the only secure military aerodrome in the State. The requirement for such a facility has been underlined by its use for the highest level intergovernmental tasks and for sensitive extraditions. The arrivals area is not overlooked from any building in close proximity and consequently, there is a requirement to continue the limitation of development in close proximity to that area and to the aerodrome runways."</p> <p>As a result of Amendment PA211, we would ask that the Planning Authority revisit the proposal to rezone this wedge of land from 'B' to 'EP2'. It is the last remaining small parcel of land (c.1ha in extent), which forms part of the larger Profile Park landholding zoned for employment and economic development.</p> <p>Requests clarification that the motions adopted by the members of the Council, which intended that development would be able to proceed on zoned lands within the security zone, subject to conforming with appropriate security arrangement for such locations are reflected in the plan.</p> <p>Contends that proposed amendments made to Schedule 4 are made up of incomplete parts of two different motions (Motions 239 and 242) and therefore 'dilutes' the thrust of the motions adopted. Requests that the schedule be amended to</p>	<p>Amend0056</p>	<p>the position of the Council regarding the security zone around Casement Aerodrome should revert to that of the Draft Plan. This would result in the deletion of item 3 of the Explanatory Note and the reinstatement of the sentence shown in red strikeout on page 126 of the Proposed Amendments report which reads 'For safety and security reasons, it is also policy that no new development be permitted within the restricted area shown on the Maps and which comprises the aerodrome and the lands immediately adjoining the aerodrome boundary.' Having regard to the above, some of the points raised in the submissions in the column opposite will no longer be relevant.</p> <p>While PA211 proposes to amend the wording of the part of item 2 referred to for the purposes of clarity, there is no substantive change proposed. As such, the reference to the distance within which no development is allowed on lands lying under the runway approach surfaces for runways 05 and 23 remains unchanged from the existing Development Plan at 1,100 metres (3610 feet). The Council acknowledges the position of the Department of Defence, but notes that the function of the Explanatory Note is to point out differences in policy between the Council and the Department. As such, no change is required.</p> <p>It is considered that given the need to secure safe air navigation within these particular areas, this would form a fundamental consideration in the event of any application within these 'red zones'. While the proposed amendment would appear to give flexibility in considering applications within the 'red zones' it is considered that, in practice, this would be very limited. The wording of the proposed amendment is considered appropriate and would be broad enough to account for a number of development proposals within the red zones rather than referring only to a specific land use.</p> <p>Notwithstanding the foregoing, it is considered that the phrase 'within the red zones, some development is permissible' may convey a misleading presumption in favour of development. It is considered that replacement with the phrase 'within the red zones, some development may be permissible' would more accurately express the position vis-à-vis</p>
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reflect the motions adopted by the members of the Council; such as “that development of these lands is now permitted in principle, subject to conditions on scheme design addressing security.”

Believes that the paragraph “Casement Aerodrome is the only secure military aerodrome in the State.....the limitation of development in that area and in close proximity to the aerodrome boundary” is in conflict with the agreed motions 239 and 242 and should be amended.

Requests that the criteria for determining the acceptability of development within the red zones should be in accordance with national and international best practice, as applied at Dublin, Cork and Shannon airports and that Schedule 4 should be amended to reflect this.

The amendment to this paragraph allows for some limited development to be permitted in principle in the red zone. Therefore the phrase that states “within which no development is allowed” should be amended to reflect this change.

Requests the omission of any reference to ‘restricted area’ and any reference to an ‘objection to planning permission’.

The conclusion paragraph of Schedule 4 refers to prohibition and restriction of development. Request for amendments to be made to this paragraph to reflect the decision made by the Council members.

The South Dublin Chamber welcomes the positive changes made to the security arrangements at Casement Aerodrome, Baldonnell, brought about by the Amendment Ref. No. PA110 and the Amendment Ref. No. PA211. Believes that implementation of a Security Consultation Area around and outside the aerodrome boundary will be effective and indeed that it will improve on the current arrangements in place at Casement Aerodrome.

Concern that there is the possibility for interpretations other than those which the changes to the development plan sought to clarify and to this end would urge that the

development.

This existing wording regarding security at Casement Aerodrome on page 266 of the Development Plan is considered adequate.

The request to rezone land located at Profile Park, within the proposed security consultation zone, relates specifically to zoning of land other than that proposed in PA228 and does not relate directly to a specific proposed amendment to the plan and therefore cannot be considered. It should be noted that the issue of the security zone around Casement aerodrome is not the only criterion for considering the zoning of lands. It is the view of the manager that sufficient lands have been zoned for enterprise and employment purposes for the Plan period.

The wording of the amendment clearly reflects the relevant motions that were adopted by the elected members. The zoning of lands is a separate issue and consideration of the merits of zoning particular lands must be made on a case-by-case basis and having considered the proper planning and sustainable development of the County

With respect to the layout of the ‘red zones’ in the Draft Development Plan these are considered to accord with the appropriate international standards. It is incumbent on the Development Plan to clearly identify these zones.

The issue of air safety is a separate matter to that of security around Casement aerodrome. The Development Plan sets out clear policies in relation to air safety, in particular it is considered that the ‘red zones’ as indicated on the Development Plan maps reflect international standards and their inclusion is prudent in considering the proper planning and sustainable development of the County.

The phrase ‘within which no development is allowed’ refers to an area within the Public Safety Zone and remains correct.

<p>development plan provide clarity and remove ambiguity in areas. For example, there are some amendments required to the Development Plan text to remove some outdated references in regard to the Red Zones, carried over from the previous Development Plan text.</p> <p>The Chamber believes that following the Council Motions debated in relation to Casement Aerodrome, there was a clear understanding that the intended consequence of passing the Motions was that when development was proposed within the security zone, on zoned lands, that development would be able to proceed subject to conforming with appropriate security arrangements for such locations; being largely matters that need careful design input to a scheme. This clarity is needed to prevent future misunderstanding or misinterpretation.</p>	<p><b>Manager's Recommendation</b></p> <p>It is considered that the phrase 'within the red zones, some development is permissible' should be replaced with the phrase 'within the red zones, some development may be permissible'.</p> <p>It is recommended that item 3 of the Explanatory Note be deleted and that the position of the Council regarding the security zone around Casement Aerodrome should revert to that of the Draft Plan</p> <p>It is recommended that the sentence shown in red strikeout on page 126 of the Proposed Amendments report which reads 'For safety and security reasons, it is also policy that no new development be permitted within the restricted area shown on the Maps and which comprises the aerodrome and the lands immediately adjoining the aerodrome boundary' be reinstated.</p>
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## SCHEDULE 6 HOUSING STRATEGY

Proposed Amendment Ref.	Sub No	Manager's Response and Recommendations
<p><b>PA213</b></p> <p>Seeks clarification on the housing target figures in Table 4.5 of the Housing Strategy.</p> <p>Commentary on the national Population projections should be reworded to reflect that a substantial reversal from recent migration trends is likely to pertain over the plan period. Table 4.2-The population forecasts from the RPG 2010-2022 are compared to the DoEHLG forecasts 2007, which have been superseded by 2009 projections- this table should be</p>	<p>Amend0033 Amend0041</p>	<p><b>Manager's Response</b></p> <p>The housing target figure of 27,899 as set out in table 4.5 was extracted using the 2006 census figure of 87,484 and 2016 RPG forecast of 115,373. While it is acknowledged that the figures for 2016 may be unachievable due to changing housing market and economic conditions and may need to be deferred to the 2016 -2022 period, it is crucial that South Dublin is well positioned and prepared to work in developing new housing supplies on the return to economic growth in the housing market. The target figures are based on nationally published information. The legislative option to review and amend the strategy within 2 years of</p>

amended to reflect this. The RPG national total for 2016 appears to be incorrect- the figure should be 4,997,000. Recommended that the commentary on national population projections is reworded as set out to reflect current migratory trends and the population forecast table should be revised to provide the correct figures.

preparation will be explored in conjunction with evolving economic and housing market conditions and available published statistical information at this time.

The draft plan was prepared in accordance with the latest available published national statistical information and guidelines which were in force at the time of preparation which included the Department of the Environment forecasts 2007. The legislative option to review and amend the strategy within 2 years of preparation will be explored in conjunction with evolving population trends, changing economic conditions and available published statistical information at this time.

It is accepted that the stated figure of 5,375,200 in respect of National RPG population forecast to 2016 is incorrect. The correct figure is indeed 4,997,000, propose to amend accordingly.

**Manager's Recommendation**

Amend section 4.1 of the Housing Strategy to read as follows;

**4.1 National Projections**

One of the two main factors that affect population figures is the natural increase that occurs when birth - rates are higher than mortality-rates. The other key factor that affects population figures is migration. Ireland has in recent years experienced significant increases in immigration. In light of changing economic conditions and its effect on population movement's net immigration increases demonstrated in previous years will start to decline. The combination of these natural increases and migration assumptions lead to the national population projections as set out in the following table. National Population Projections 2006 ----2020

Amend Table 4.2 National 2016 population figures to read 4,997,000.

Amend table 4.5 Housing Allocation for Local Authorities- No. of Housing Units as follows;

	2006 Census	2016	Nett Req. 2006-2016
Dublin City	223,098	265,519	42,421
Dun Laoghaire Rathdown	77,508	98,023	20,515
Fingal	89,909	118,646	28,737
South Dublin	87,484	115,373	27,889
Kildare	68,840	93,748	24,908
Meath	61,257	79,729	18,472
Wicklow	49,088	68,351	19,263
GDA Total	657,184	839,389	182,205
Source: RPG Draft Guidelines 2009			

# APENDICES

## APPENDIX 7 STRATEGIC ENVIRONMENTAL ASSESSMENT

Proposed Amendment Ref.	Sub No	Manager's Response and Recommendations
<p><b>PA214</b></p> <p>The overall quality of the Environmental report is so low that there is a severe danger that the plan cannot be made legally – due to a lack of compliance with the SEA regulations.</p> <p>There is little mention of the Metro West in the Environmental Report, yet the route will, almost certainly cross the Liffey Valley Special Amenity Area Order (SAAO) and we note that Council Policies LHA4 -LHA7 seek to protect the Valley.</p> <p>We question the depth and quality of the environmental report. In the last phase of the plan, every occurrence of the phrase “have regard to” has been changed to read “as far as is practicable, be consistent with” however the commentary in the environmental report is almost consistently: “The Proposed Amendment would not change the assessment provided in the Environmental Report.”</p> <p>We note in the environmental report, specific policies in relation to valuing national designations of protection and locally significant sites, we believe that there is an insufficient emphasis on the 'wider countryside measures' as detailed in European Court of Justice rulings to protect biodiversity, and also an insufficient recognition that there is more to the</p>	<p>Amend 0049 Amend 0032 Amend 0033 Amend 0035</p>	<p><b>Manager's Response</b></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><b>Manager's Recommendation</b></p>

Habitats directive than Articles 3 through to 6.

As part of an SEA there should be detailed in the plan a list of all areas in the county that contain Red Book species, and plants subject to a Floral Protection Order.

It is not clear in the SEA how the Liffey CFRAMS is going to be addressed. This area needs to be clarified.

We do not believe that the Liffey's status as a salmonid river has been considered adequately in the Plan or in the Strategic Environmental Appraisals

SEA Environmental reports assessment of the proposed alteration to QBC's is inadequate in assessing the impact of the proposed change in terms of noise, dust, emissions etc.

The use of national plans whose legitimacy is under question, given their own lack of conformance to SEA such as Transport 21 is somewhat at odds with the Council's own specific attempts to comply with legislation.

Acknowledged gaps in the SEA need to be addressed in terms of how these gaps will be filled and how the Plan and Environmental report will be managed in the context of the emerging information.

It is a matter for SDCC to determine whether or not the implementation of the Proposed Amendments would be likely to have a significant effect on the environment. Refer to criteria set out in Annex II of the Directive 2001/42/EC - SEA Directive and Schedule 2A of the P&D Regulations 2004.

SDCC Obligated to take the relevant criteria set out in Schedule 2A of the P&D Regulations 2004 into account in making its decision as to whether or not the Proposed

See **ENVIRONMENTAL REPORT - Response to the Environmental Issues arising from Submissions following the public display of the Proposed Amendments to the Draft South Dublin County Development Plan 2010 – 2016 and Environmental Report - Addendum 2**

The response to the detail of all of the submissions on the overall SEA is dealt with in the above report along with the environmental assessment of the submissions on individual amendments.

Amendments would be likely to have significant effects on the environment and it should be clarified if the Proposed Amendments have been screen for likely significant effects, including cumulative effects.

Noted that a number of proposed Amendments are described as having potential for negative environmental effects prior to mitigation measures being established: (Policy TDL28 (B), LZO164, PA227 and PA228). SDCC should ensure that the proposed amendments do not conflict with policies/objectives in the Draft Regional Planning Guidelines for the Greater Dublin Area 2010-2022.

Clarification required to the extent to which Flood Risk Assessment has been undertaken in accordance with the relevant Flood Risk Management guidelines.

Clarify how the AA screening has taken into account potential 'in-combination' effects and cumulative effects as a result of a number of the proposed amendments, as identified in the Environmental Report.

Referred to the requirement to prepare an SEA statement outlining "Information on the Decision" as required by Article 13l of the Planning and Development Regulations and a copy of such should be sent to any Environmental Authority consulted during the EA process. Summarising the following: How environmental considerations have been integrated into the plan; How the environmental report, submissions, observations and consultations have been taken into account during the preparation of the plan; The reason for choosing the Plan adopted in light of other reasonable alternatives dealt with; and The measures decided upon to monitor the significant environmental effects of the implementation of the plan. A copy of the SEA statement with the above information should be send to any Environmental Authority consulted

during the SEA process.		
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## APPENDIX 9 EUROPEAN CHARTER OF PEDESTRIAN RIGHTS

Proposed Amendment Ref.	Sub No	Manager's Response and Recommendations
<p><b>PA238</b></p> <p>We submit that you have failed to include an Appendix reproducing the European Charter of Pedestrian Rights as provide on page 102 of the Draft – 2nd pt in list of pts.</p> <p>Recommend that the Draft is amended to show how the European Charter of Pedestrian Rights has influenced the plan's polices as it is unclear in what manner the Charter has influenced the County's Policies on walking and pedestrians.</p>	<p>Amend0031 Amend0041</p>	<p><b>Manager's Response</b></p> <p>Amendment Ref. No PA238 Sets out the proposed addition of Appendix 9: The European Charter of pedestrian Rights to correct the omission of the Charter in the Draft Plan.</p> <p>Section 2.2.14 of the Draft Plan set outs the following; In order to promote the development of walking and cycling it is the intention of the Council:</p> <ul style="list-style-type: none"> <li>• To continue to develop Slí na Sláinte walking routes in the County in consultation with community groups;</li> <li>• To comply with the European Charter of Pedestrian Rights (1998 as reproduced in Appendix 7</li> </ul> <p><b>Manager's Recommendation</b> No change recommended.</p>



## MAPPING

Proposed Amendment Ref.	Sub No	Manager's Response and Recommendations
<p><b>PA0217</b></p> <p>Support this amendment.</p>	<p>Amend0026</p>	<p><b>Manager's Response</b> The support for this amendment has been noted.</p> <p><b>Manager's Recommendation</b> No change recommended</p>
<p><b>PA218</b></p> <p>In the interest of clarity, requests that isochrones indicating which sites fall within the consultation distances of the Seveso sites are transposed onto the amended draft development plan maps. (It is unclear whether the proposed consultation distances should be measured from the perimeter or from centre of the sites.)</p>	<p>Amend0050</p>	<p><b>Manager's Response</b> It is considered that the plan sets out clearly the location of the sites where the HSA should be consulted in relation to Seveso sites.</p> <p><b>Manager's Recommendation</b> No change recommended</p>
<p><b>PA227</b></p> <p>Object to amendment on grounds that Environmental Report states that this is a flood plain and rezoning would be in contradiction with other policies and objectives in the Draft Plan.</p> <p>EPA – requests that the proposed amendment should not conflict with policies and objectives of the Draft Regional Planning Guidelines for the Greater Dublin Area 2010-2022</p>	<p>Amend0026 Amend0035</p>	<p><b>Manager's Response</b> The submissions both for and against this amendment are noted, as is the environmental report. However, it is considered that in the context of the overall development plan strategy and the particular location of the amendment that the proposed amendment would not conflict in a material way with the objectives and core principles of the plan.</p> <p><b>Manager's Recommendation</b> No Change recommended</p>
<p><b>PA228</b></p> <p>Welcomes, supports and notes amendment PA228</p> <p>Concern in relation to the impact on policy T19, and the</p>	<p>Amend0022 Amend0049 Amend0033 Amend0035 Amend0041</p>	<p><b>Manager's Response</b> The support for the rezoning of the lands has been noted. Notwithstanding this, 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</p>

<p>Camac River.</p> <p>Objects to the extent of new zoning of industrial land on the Naas Road. Development lands beyond a 6 year horizon should not be zoned for development.</p> <p>Recommends that the lands zoned for enterprise and employment in the south, north and east of Baldonnell Airport are not provided for in the development plan in the absence of an explanation for the requirement of this additional zoned land.</p> <p>Support for the changes made to zoning related to Casement Aerodrome.</p> <p>Request that the legend be amended to refer to 'Security Zone Restrictions' rather than 'Security Consultation Zone'.</p> <p>Seeks clarification that the dark outline indicating Public Safety Zones shown on the digital copy maps, in the shape of a PSZ, is an indication only of the space within which the amendment has been made.</p> <p>Request that this amendment be deleted because industrial development around Casement Aerodrome would have a negative impact on river systems in the area, many of which are already highly polluted. It would also negatively impact on biodiversity corridors established in the area as the green belt established by the Aerodrome contracts due to development.</p> <p>Request that this amendment be deleted - questions the need for more industrial development around this location as there is already an excess of vacant industrial units in the Greenogue industrial estate which is more than sufficient to meet the needs of industry.</p>	<p>Amend0054 Amend0053 Amend0028</p>	<p>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 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. Furthermore the lands are located directly adjacent to Casement Aerodrome, high security facility. In reference to matters relating to a security zone around casement aerodrome, the Manager has given a clear response to this matter in the relevant sections of this report. This response is applicable with respect to these lands.</p> <p>The site would not have direct access onto or from the N7 without the prior agreement of the National Roads Authority.</p> <p>The dark outline, as shown on the development plan maps that went out to public consultation, is indicative only. The purpose of the thick black line was to indicate where an amendment was proposed and this was to help make it legible for those studying the maps.</p> <p><b>Manager's Recommendation</b> The zoning of the site should revert back to the Draft Plan Zoning, which was Zoning Objective 'B'.</p>
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<p>Request that this amendment be deleted because the area around Casement Aerodrome is not accessible by public transport and is not located along a public transport corridor. There is also no direct access onto the N7 for any proposed development in this site and any such access would not be allowed by the NRA.</p> <p>EPA – requests that the proposed amendment should not conflict with policies and objectives of the Draft Regional Planning Guidelines for the Greater Dublin Area 2010-2022</p>		
<p><b>Comments which do not relate to any Proposed Amendment</b></p> <p>The submission requests that the council clarify that the proposal in their previous submission of the 2nd December 2009 did not include a proposal for the rezoning of land within the Casement Aerodrome approach area or restriction zone.</p> <p>Proposals to rezone existing filling station sites at both Glenview and the Blessington Road.</p> <p>Comment regarding the crossing of the Liffey by the proposed Metro West route.</p> <p>Comment regarding an alternative site for the green waste facility in Lucan.</p>	<p>Amend0011 Amend0030 Amend0033</p>	<p><b>Manager's Response</b> These issues raised do not address the specific changes to the draft written statement in any proposed amendment and are therefore deemed to be invalid.</p> <p><b>Manager's Recommendation</b> No change recommended</p>

# SUBMISSIONS/OBSERVATIONS ON THE PROPOSED AMENDMENTS TO THE DRAFT PLAN

## 1 Introduction and Core Strategy

### 1.1 Invalid – Does not relate to a proposed amendment number

1. Comment in relation to socio-economic rationale to justify all proposed development. ([Amend0014](#))
2. Recommend that the Garda Divisional Crime Environmental Officer be consulted by the planning department to ensure best practice in planning for the prevention of crime and anti social behaviour and also to ensure that cognisance is afforded to the needs of An Garda Síochana ([Amend0055](#))

### 1.2 PA001

1. Support this amendment. ([Amend0031](#))

### 1.3 PA002

1. The Population Targets for Local Authorities as reproduced from the Draft Regional Planning Guidelines for the Greater Dublin Area 2010-2022 are patently out of date and no basis on which to plan for the next 6 years ([Amend0049](#))
2. Comment in relation to population projections. Underlying population projections seem to have been informed by the 2006 census and are now significantly out of date given the effect of the current economic crisis on population- DRPG's figures are wildly overstated. ([Amend0032](#))
3. In response to the additional information added to Section 0.2 of the plan it is requested that, in the interest of clarity and demonstrating consistency with the Regional Planning Guidelines for the Greater Dublin area, a table is compiled and included which includes the following information : a) a detailed breakdown of the location and distribution of the 627 hectares of zoned lands within the context of the locations/settlements outlined in the County Settlement Hierarchy as outlined in Section 3.3 of the draft plan: b) the locations of housing development lands to be prioritised for development over

the period of the plan across each of the locations / settlements above in line with the Housing Land Requirement for South Dublin as set down in the Regional Planning Guidelines; c) the allocation of housing units in all locations/settlements above in line with the Housing Land Requirement for South Dublin as set down in the Regional Planning Guidelines; d) the development capacity of housing development lands and planned capacity increases during the plan period. The table should be accompanied by a statement outlining how the data and details therein will be re-evaluated in the light of any new or revised local area plans. (Amend0042)

4. Seeks clarification on the population projections claiming that the overestimation will result in over-specifications of infrastructural development requirements and zoning requirements. (Amend0033)
5. PA002- NTA notes that the population targets of the RPGs 2010-2022 would now be included. The legacy of zoned residential land in peripherally located areas on the western and southern fringes of the County has the potential to undermine the Draft Plans emphasis on consolidation. Phasing is required to ensure that population and employment growth is focused in the first instance on higher order urban centres and the catchment areas of public transport and other services required at the local level. It is especially important that consolidation occurs if there is a reduction in the rate of population growth below that currently targeted. It is recommended that the draft plan reflect the significant constraints in providing public transport to rural and peri-urban areas- the Development Plan should specify criteria to guide the phasing of zoned development land related to relative levels of accessibility by public transport, walking and cycling, and proximity to local services. The Draft Plan should highlight this as among the key reasons for the need to control development in rural areas, and for focussing growth into higher order centres, facilitating the development of a critical mass that can support the viability of providing effective public transport. There should be a presumption against any further zoning in peripheral areas and phasing of development of existing zoned lands - phasing should focus on the consolidation of existing urban based areas on the hierarchy of urban centres, and development should be phased to reflect the delivery of and deliverability of public transport. This sequential approach should be incorporated in to the core strategy. (Amend0041)

#### **1.4 PA003**

1. Educational accommodation requirements in the South Dublin Area are being considered by the Department of Education, in relation to population growth and school planning. (Amend0019)
2. Welcomes statement regarding no new zoning but its inclusion and acceptance warrants consideration of the need for and merit of dezoning – an option which seems to have been ignored by the Council. (Amend0049)

3. Requests consideration of dezoning on basis that the plan has sufficient lands to accommodate its regional population share. (Amend0049)

### **1.5 PA005**

1. The RIAI believes that the expansion of this core strategy is welcomed but it is important that specific polices and development control standards are included to make the strategy a reality. (Amend0046)
2. The Council is merely using the requirement to ameliorate the effects of climate change to justify its own priorities for the expansion of retail and the furtherance of high density development. Apart from the move away from incineration, there is little in the plan that demonstrates a commitment to ameliorate the effects of climate change. (Amend0049)

### **1.6 PA006**

1. Support this amendment. (Amend0031)

### **1.7 PA007**

1. Support this amendment (Amend0031)

### **1.8 PA008**

1. PA008- Reference should be made to the EU Flood Directive and the DoEHLG Flood Risk Management Guidelines. (Amend0035)
2. Referred to the responsibilities and obligations and responsibilities in accordance with all national and EU environmental legislation and to ensure that SDCC, when undertaking and fulfilling its statutory obligations is at all times compliant with the requirements of national and EU environmental legislation. (Amend0035)

### **1.9 PA012**

1. Amendment sought to require that all approved local plans be statutory plans to ensure clarity about the status, adoption process and timeframe of plans, for all parties or, in the alternative, to have a clearly defined 'best before date'. ([Amend0051](#))
2. Seeks clarification on the use of the term 'local plan' because 'Local Area Plan' has a distinct meaning in planning legislation whereas the former does not. ([Amend0050](#))

### **1.10 PA013**

1. There appears to be a number of typographical errors in the column with some boxes empty and others containing two zonings. ([Amend0049](#))
2. PA013 - Welcome the recognition of the Liffey Valley as an entity and new zoning designation. ([Amend0032](#))
3. PA013- Serious typographical and formatting errors in the table detailing the zoning matrix for the Liffey Valley Zoning- needs to be corrected and also where it features in the Environmental Report. ([Amend0032](#))
4. Seeks clarification on the zoning objectives matrix in relation to the land uses within the new Liffey Valley Zoning. ([Amend0033](#))
5. PA013- Consideration should be given to amending new objective 'I' to include reference to protect biodiversity of the Liffey Valley. ([Amend0035](#))

## **2 A Living Place - 1.2 Housing**

### **2.1 PA014**

1. Seeks the modification of sections of the text to enhance the council's policy in the area of social segregation, social/affordable/private housing and mix of tenure. ([Amend0027](#))

### **2.2 PA015**

1. Support for the amendment to the definition of brownfield sites. ([Amend0051](#))

### 2.3 PA018

1. PA018- Proposed that the word “residents” in the first proposed paragraph be replaced by the word “applicants”. This paragraph is not consistent with the Sustainable Rural Housing Guidelines 2005 or with Circular SP 5/08- neither are restrictive to residents. (Amend0017)
2. Acknowledgement that there is an attempt to control the spread of one-off houses. (Amend0049)
3. Seeks clarification that the facilitation of a cluster-type residential development requires an Appropriate Assessment and if so, Policy H29 should be reconsidered. (Amend0033)

### 2.4 PA019

1. PA019- Proposed that the Policy H30 (A) be relocated to a new section 1.2.52.i (a) and be renamed as Policy H29 (A): Rural Housing Policies and Local Need Criteria- to be consistent with Section 1.2.51 Management of One-Off Housing in Rural Areas. Proposed policy is not consistent with either the Sustainable Rural Housing Guidelines 2005 nor Circular SP 5/08. (Amend0017)

### 2.5 PA020

1. PA020- Policy H31 (A) - It is proposed that this new Policy be amended to include applicants with exceptional health circumstances. It is proposed that the wording of the proposed new Policy H31(A) be modified to the following:- 1.2.52.iii(a) Policy H31(A): Exceptional Housing Need in Dublin Mountain Zone It is the policy of the Council within areas designated with Zoning Objective ‘H’ (“to protect and enhance the outstanding natural character of the Dublin Mountain Area”) to consider permitting a new or replacement dwelling on a suitable site where exceptional health circumstances exist, whether such circumstances relate to the applicant themselves or where the applicant is a person such as a Registered General Nurse, caring, nurturing and looking after the health and well being of an immediate elderly family member or relation in the community in a professional capacity that would otherwise require hospitalisation." Section 4.3 of the Sustainable Rural Housing Guidelines provides that planning authorities should consider granting planning permission where the exceptional health circumstances relate to the applicant themselves as distinct from a person under the applicant's care. (Amend0017)



## 2.6 PA021

1. PA021-There should be a caveat to the reference to Agricultural buildings in Policy H32(A) to ensure they are situated and designed so as not to impact on the landscape and biodiversity of the Liffey Valley zoned area. ([Amend0032](#))
2. Support for the designation of the Liffey Valley Zoning. ([Amend0033](#))
3. Support for the creation of an Architectural Conservation Area along the Liffey Valley to incorporate the weirs, mills and industrial cottages. ([Amend0033](#))
4. PA021- Comment requesting that the ongoing operations of the Leixlip Power Station site are supported in Development Plan policy and in any future planning application. Critical that ESB are not restricted in any way in fulfilling its mandate as energy supplier, additional lands for expansion must be available for ESB to meet statutory regulations and increasing energy demands. ([Amend0038](#))
5. PA021- Comment regarding support of policy EC9 of the Draft Development Plan and wished to see similar recognition given to its strategic role in the description of the Liffey Valley zoning. ([Amend0038](#))

## 2.7 PA023

1. PA023 Policy H33 (A): Rural Communities of Glenasmole /Bohernabreena /Ballinascorney /Brittas is not consistent with the Sustainable Rural Housing Guidelines 2005 or with Circular SP 5/08 neither of which are restrictive to “local residents”. It is proposed that the words “local residents” in this new Policy H33 (A) be deleted and be replaced by the word “applicants”. ([Amend0017](#))
2. It is proposed that the wording of Policy H33 (A) be modified to the following: - 1.2.52.v (a) Policy H33 (A): Rural Communities of Glenasmole /Bohernabreena /Ballinascorney /Brittas It is the policy of the Council to seek to ensure the long term viability of the rural communities of Glenasmole /Bohernabreena /Ballinascorney /Brittas and to this end, will facilitate applicants who wish to build a family home in their local area. Development proposals for new or replacement dwellings located within the areas of Glenasmole /Bohernabreena /Ballinascorney /Brittas will only be permitted on suitable sites where, • Applicants can establish a genuine need to reside in proximity to their employment; (such employment being related to the rural community) Or • Applicants have close family ties with the rural community. ([Amend0017](#))

## **2.8 PA025**

1. PA025- Inclusion of reference to the Code of Practice welcomed. (Amend0035)

## **2.9 PA026**

1. This is a positive step although, in our opinion, we believe that the Council has a responsibility to ensure that any Management Companies which are created as part of a development are properly constituted and run in the best interests of the residents. (Amend0049)

## **3 A Living Place - 1.3 Social Inclusion, Community Facilities and Recreation**

### **3.1 Invalid – Does not relate to a proposed amendment number**

1. Comment in relation to green spaces and inserting boundaries to all open spaces. (Amend0014)
2. The RIAI believes that there is much in the SDCC Draft Development Plan to support, in particular its focus on urban design and neighbourhood planning. However, the role of the school, particularly school location and integration in the development of the neighbourhood, is underdeveloped (Amend0046)

### **3.2 PA030**

1. Recommends an amendment to Policy SCR12 (A) to read as follows: Co-operation with existing schools and the Department of Education and Science in the Sustainable Development of existing Schools and Educational Institution Sites. It is the policy of the Council to support and assist existing schools and the Department of Education and Science in proposals for sustainable and appropriate development on existing school and educational institution sites within the County. (Amend0007)
2. The Department of Education and Skills acknowledges the content of this amendment in regard to the development of existing schools, the assessment of school capacity in regard to new residential development and the review of the need for schools within the county. (Amend0019)

3. The name Department of Education and Skills be inserted instead of Department of Education and Science everywhere it occurs in the South County Dublin Development Plan (Amend0004)
4. PA030- When sites are being chosen, account must be taken of the traffic safety, access to public transport and traffic disruption should all be taken into account. (Amend0049)

### 3.3 PA031

1. The Department of Education and Skills acknowledges the content of this amendment in regard to the development of existing schools, the assessment of school capacity in regard to new residential development and the review of the need for schools within the county. (Amend0019)
2. Agree with the sentiments in this amendment, we feel that the selection of School and educational institution sites must take into account the accessibility of the site by public transport and its location in relation to the target audience for accessibility by walking and cycling – especially for primary schools. (Amend0049)
3. PA031- Our concerns are partly addressed by: 1.3.20.iii(b)Policy SCR12(B): New Residential Development and the Assessment of School Capacity (Amend0049)

### 3.4 PA032

1. The Department of Education and Skills acknowledges the content of this amendment in regard to the development of existing schools, the assessment of school capacity in regard to new residential development and the review of the need for schools within the county. (Amend0019)

### 3.5 PA033

1. PA033-Our concerns are partly addressed by: 1.3.20.vi (a) Policy SCR 15(A): Safe Queuing and Drop-Off Facilities. (Amend0049)
2. PA033- Welcome SDCCS proposal to introduce safe queuing and drop off facilities at primary and secondary schools. (Amend0055)

### **3.6 PA035**

1. PA035-The problem of institutional lands being developed is hinted at but not sufficiently dealt with by the section 1.3.35 Recreation (Amend0049)

### **3.7 PA036**

1. PA036-We hope that this policy will be carried out, especially in the Two SDZs in the county as well as in infill developments (Amend0049)

### **3.8 PA040**

1. This is a useful aspiration but we would go further to say that the layout of all open space in a development, and especially in a high density development, should be usable to the community (Amend0049)

### **3.9 PA042**

1. Support this amendment (Amend0031)
2. PA042-Welcome this policy (Amend0049)

### **3.10 PA043**

1. PA043-The new sentence regarding allotments should be expanded to acknowledge the role of allotments in affording resilience to climate change e.g. food security. (Amend0046)

## ***4 A Living Place - 1.4 Sustainable Neighbourhoods***

### **4.1 Invalid – Does not relate to a proposed amendment number**

1. Comment in relation to widening the types of architectural landmarks beyond new, modern buildings. ([Amend0014](#))

### **4.2 PA050**

1. PA050-The final principle regarding hard surfaces could also reference the following document:<http://www.communities.gov.uk/documents/planningandbuilding/pdf/pavingfrontgardens.pdf> Note many of the principles referred to in this policy do not relate to solar gain, rather wider issues of sustainability and should be under a separate heading or headings. ([Amend0046](#))
2. PA050- Inclusion of SUDS technologies to be incorporated is noted. ([Amend0035](#))

### **4.3 PA051**

1. The RIAI propose the policy should be reworded as follows: “It is the policy of the Council to promote a practice in building construction of the highest standards of energy efficiency particularly in the area of insulation, air tightness, passive solar gain, efficiency and provision of appropriate renewable energy systems. While Specific Energy Performance standards of new buildings are set by National Standards i.e. Building Regulations energy performance and renewable energy installations exceeding the minimum statutory requirements will be encouraged to as high a degree as practically possible in any given situation”. ([Amend0046](#))

## ***5 A Connected Place - 2.2 Transportation***

### **5.1 Invalid – Does not relate to a proposed amendment number**

1. Comment in relation to reviewing proposed amendments as they relate to transportation, including national roads and land use taking account of the Draft Spatial Planning and National Roads Guidelines. ([Amend0023](#))

2. Request that general policies be strengthened in favour of Metro West and reconsider EP1 zoning in close proximity to Metro West Stops. ([Amend0029](#))
3. Request that if metro West is granted a Railway Order during the lifetime of the Plan an assessment will be carried out to determine whether rezoning of the land currently zoned Green Belt at Newlands for future development should take place. ([Amend0029](#))
4. Comment in relation to the fact that there are no proposed amendments addressing the significant concerns on Metro West and the Outer West Route. ([Amend0032](#))

## 5.2 PA053

1. PA053- Replace reference to DTO with NTA- have regard to comments on Amendment PA069 in relation to NTA Strategy and Implementation Plan. ([Amend0041](#))

## 5.3 PA054

1. Concern regarding 2.2.9.ii Policy T4A Underutilised QBC's. Schemes where bus priority is provided in addition to existing roadway infrastructure are constructed where there is significant demand for public transport and are therefore unlikely to be considered "underutilised" It is requested that this policy be removed. ([Amend0025](#))
2. To change QBC's to part-time QBC's or to remove them altogether would be a retrograde step. Any move to increase the vehicular capacity of a road whilst reducing its appeal for public transport is neither sustainable nor in line with the Department of Transport's Smarter Travel policy. ([Amend0049](#))
3. It should be noted that removing the QBC on the ORR would increase the noise on ORR and would be at odds with the Aim in 2.4.1 of the Environmental services section ([Amend0049](#))
4. PA054- Amendment does not identify the QBC's in question, why they are considered underutilised and whether the reallocation of road space currently allocated to bus, to other road users, is on a temporary or permanent basis. The QBC network should be considered as a whole as the removal of specific segments of the network could undermine its overall benefits. In advance of any reallocation of road space it would need to be demonstrated that there is a lack of public transport demand on the routes in question, taking into consideration the potential for bus route reconfiguration. The NTA

does not support the inclusion of the amendment and recommends that it is not included in the Development Plan. (Amend0041)

#### 5.4 PA056

1. PA056- On completion of details-final alignment of Lucan Luas should be reserved and illustrated on development plan maps. (Amend0029)

#### 5.5 PA057

1. Support this amendment (Amend0031)
2. The additional sentence "In view of promoting a healthy lifestyle" should be expanded as follows "In view of promoting a low carbon and healthy lifestyle". The proposed new walkways and cycle routes could also incorporate the identification & mapping of rural roads with designation of green roads within the Local Authority where pedestrians and cyclists are prioritized with low speed limits, restricted sight lines, and integral calming measures (hills, hollows trees etc). Where such rural roads are identified, hedgerows, native trees, and real local stone walls should be reinstated and inappropriate walls and fences to be removed restoring linear hedgerows. The Development Plan should make provision for the enforcement of new public boundary biodiversity standards. (Amend0046)
3. PA057- The proposed amendment to improve road safety for pedestrians and cyclists by lowering speed limits and priority over motorised transport, should be the ambition for town centres and residential areas, but that approach should not be applied across the board. The statement also appears to contradict Table 2.2 where roads are identified for 'on road cycle tracks' and others for 'off road cycle tracks'- it is noted that all roads in Table 2.2 involve the provision of some class of cycle track, - no road is identified for mixed cycling with no infrastructure. Table 2.2 provides very little information on the detail of the cycle routes set out as part of specific roads, where possible dimensions and particulars should be specified. It is also inconsistent in the relationships between cycle facilities and road type, e.g. National Roads with on road facilities Vs local roads with off- road cycle tracks. Recommendation that the amendment is reworded as follows; "Cycle provision, whether integrated with low speed, low volume general traffic in locations such as town centres or residential areas, or segregated from general traffic on higher speed and volume roads, will be provided in line with the forthcoming NTA's National Urban Cycle Manual." This process would include inter alia: -Survey of the existing infrastructure -Quality of service rating -Network

Planning for cycling as part of the overall Network Planning for all modes on all routes (NB. including HGV's) -Segregation vs. Integration of facilities provision of cycle ways and other off- road routes, e.g. through parks etc. -Development of a cycle parking policy - for public and private developments -Interaction between cycling and public transport -Special attention paid to routes to school (Amend0041)

## 5.6 PA058

1. PA058- Support intention of the proposed amendment. Council should also refer to the Consultation Draft Guidelines on Spatial Planning and National Routes- section 3.3 and the associated Appendix 3, which contain further guidance on the preparation of and need for such Assessments. (Amend0023)

## 5.7 PA059

1. PA059- location not marked on the revised Draft Development Plan Map, previous such proposal on north side of Leixlip road was refused planning permission. New Policy addition should be removed. Clashes with objective of PA021 and in contradiction to PA158. Object to Park and Ride proposed on any land which comprises the Liffey Valley SAAO or proposed SAAO extension or NHA or land zoned high amenity or agricultural or open space in the Valley. (Amend0026)
2. The proposed location is not at a public transport node and consequently is not a suitable position for a Park and Ride (Amend0049)
3. PA059- NTA supports the provision of park and Ride facilities, however has some concerns in relation to the location of the proposed sites. It needs to be clearly stated whether the function of these Park and Ride facilities relate to bus or rail and whether these sites would be of a strategic or local function. Park and Ride facilities- either strategic or local should only seek to cater for trips where no reasonable alternative exists to the use of the car in the first instance, and should not negatively impact on the attractiveness and viability of reasonable alternatives, in particular scheduled bus services. It is unclear from Table 2.2.3 whether the proposed park and ride sites are proposed to be strategic or local in function. PA0059 should be amended/expanded on to include criteria showing how all proposed park and ride sites were identified and whether these sites are local or strategic. Tara Co-Op Site- it is unclear at this stage, why park and Ride would either be necessary or desirable in this town centre type location. Garters Lane site- it is not clear why this would be required, in addition to the facility already committed to at Cheeverstown stop and the existing facility at the Red Cow stop. Walkinstown



Roundabout Site- it is not clear what the basis for this would be. It would appear to conflict with the general objectives relating to the provision of Park and Ride. Recommend that the subject of the proposed amendment and the other park and ride sites listed in the Draft Plan should be re-examined and park and ride policy should be revised, including a criteria based approach, identifying whether the proposed sites are rail or bus based and whether they are strategic or local. ([Amend0041](#))

### 5.8 PA060

1. PA060-NTA supports the proposed amendment ([Amend0041](#))

### 5.9 PA064

1. Propose consideration of a 30kph speed limit outside all schools within the County. ([Amend0013](#))
2. Proposal for a 30kph speed limit outside all schools within the County. ([Amend0015](#))
3. Propose consideration of a 30kph speed limit outside all schools within the County ([Amend0043](#))
4. Propose the consideration of a 30kph speed limit outside all schools within the County for safety reasons. ([Amend0020](#))

### 5.10 PA065

1. Supports the inclusion of new Policy T25B Heavy Goods Vehicles Restriction ([Amend0013](#))
2. PA065 Support for the inclusion of new policy T25 (B) to introduce a School time Heavy Goods Vehicle Restriction on the Newcastle road, Lucan. ([Amend0015](#))
3. Support the inclusion of PA065 Section 2.2.31 – New Policy T25B in the County Development Plan, ([Amend0043](#))
4. Fully support the inclusion of PA0065- School time HGV restriction. ([Amend0020](#))

### 5.11 PA066

1. Note 2, which is located after the road tables, should not be changed and the length of the parking bays should remain at 4.75m. ([Amend0008](#))
2. Seeks an amendment to the required parking levels for dwelling houses and apartments. ([Amend0049](#))

3. PA066 (And managers Report page 72- car parking standards.) NTA views the supply and management of parking as central to the management of transport demand. Whilst the policy to require maximum parking standards is welcomed, the NTA does not agree that such standards should be 'required' rather than 'permitted'- this undermines the principle of applying maximum parking standards. Table 2.2.4 note 6- this approach is a presumption that the maximum standard is required in almost all locations and can only be reduced by a maximum of 20% in limited circumstances. The level at which maximum standards are set is of great importance- where they exist, maximum standards are usually applied with varying degrees of constraint on the basis of defined location factors such as centrality- the application of parking standards would normally vary inversely with density. NTA recommends that the Planning Authority replaces 'required maximum parking standards' with 'permitted maximum parking standards' combined with a spatial definition, taking into account the location of development in relation to existing and future public transport and other services such as town or district centres. (Amend0041)
4. Clarification sought, amendment appears to be conflicting... standards set out as 2.5m wide and 5m in length and then stated as 2.5m wide and 4.75m in length. Accepted standard used by Tesco and other retailers is 2.5m x 4.8m. Due to an unnecessary increase the size of car parking would represent an unsustainable use of land. Proposed standard of 1:40 would represent a halving of the maximum car parking standard as specified in the Current Development Plan. This fails to recognise that a foodstore has different characteristics to other retail developments. The appropriate car parking standards for foodstores is 1:14- Parking Analysis document provided. (Amend0044)

## 5.12 PA068

1. PA068- Support intention of the proposed amendment. Council might consider including reference to the NRA 2006 publication, Guidelines for the Crossing of Watercourses, Ducting Construction of National Road Schemes. (Amend0023)
2. PA068- Amendment welcomed however, consideration should also be given to reference to the need for Appropriate Assessment Screening as appropriate. (Amend0035)
3. PA068- Have regard to comments made on Amendment Ref PA0069. Replace reference to DTO with NTA. (Amend0041)

### 5.13 PA069

1. Recommends that the N81 Tallaght to Hollywood Cross Road Improvement Scheme be retained as a 6-year roads objective in Table 2.2.5 as this scheme is receiving a significant priority within the NRA. ([Amend0003](#))
2. Clarification sought on the Council's roads objectives, in particular, request for a clear indication of the nature and timeframe for the road proposals affecting areas where Topaz filling stations are located. ([Amend0030](#))
3. PA0069-Recommends that a number of additional amendments be included in the Draft Plan to reflect the role of the NTA in future transport provision in South Dublin. The Development Plan should refer to the role of the NTA Strategy in relation to identifying the requirements for new road improvements schemes. Recommend the preparation of a 'Local Traffic Plan' for the County and the need for it to be consistent with the Strategic Traffic Management Plan to be produced by the NTA to be included as a stated objective of the Development Plan. It is the NTA's view that Policy T34 of the Draft Plan, which commits to implementing the road improvement schemes set out in Table 2.2.5, is premature in light of the Local Authorities' Statutory requirement under Section 65 of the DTA Act. Recommend that Policy T34 be replaced with a statement such as "Review, and set out, and implementation plan, for the road schemes in table 2.2.5 as part of a 'local traffic plan' to be prepared following the publication of the NTA Transport Strategy for the GDA. ([Amend0041](#))

### 5.14 PA070

1. supports the removal of the proposed road linking Esker Meadow View with Esker Lane ([Amend0016](#))
2. Presumption on part of NRA against further junction capacity increases on the motorway/high quality dual carriageway network. Additional connectivity from Keatings Park particularly relevant in this regard ([Amend0023](#))
3. PA070- Support amendment to remove the inclusion of the bridge over the River Dodder. ([Amend0026](#))
4. PA070-Object to M50 over-bridge from Red Cow to Ballymount (Public Transport only), it would have a negative effect on the archaeological complex at Ballymount and break up the open space of the Park. ([Amend0026](#))
5. Welcome the removal of the proposal for a bridge at Oldcourt. This will have a positive effect on the sensitive and beautiful Dodder Valley. ([Amend0049](#))
6. Clarification sought on the Council's roads objectives, in particular, request for a clear indication of the nature and timeframe for the road proposals affecting areas where Topaz filling stations are located. ([Amend0030](#))

7. Objects to the proposed route Option 7a for the R120 Road Improvement Scheme because of its impact on the heritage of the 12th lock. ([Amend0045](#))
8. Objects to the proposed route of the 'Outer Western Road' and contend that it should be located further west. ([Amend0033](#))

## **6 A Connected Place - 2.3 Water Supply & Drainage**

### **6.1 Invalid – Does not relate to a proposed amendment number**

1. Comment regarding proposals for water abstraction from the Liffey. ([Amend0049](#))
2. Comments in relation to proposals for abstraction of water from the Liffey valley and flood risk management. ([Amend0032](#))

### **6.2 PA071**

1. PA071- Amendment acknowledged and welcomed. ([Amend0035](#))

### **6.3 PA072**

1. PA072- Amendment is acknowledged. ([Amend0035](#))

### **6.4 PA073**

1. Comment stating that the setback of development of 10m from the top of a bank is not sufficient and that it should be changed to 15m at a minimum. ([Amend0049](#))

### **6.5 PA074**

1. The corollary to this should also apply, namely that development should be limited or stopped completely if the required capacity is not present. ([Amend0049](#))

2. PA074- Consideration should be given to inclusion of a reference to 'assimilative capacity' of receiving waters as a constraint on discharges to protect ecological integrity. (Amend0035)
3. In proposing the plan, and any related modifications of the Plan, and in implementing the Plan, adequate and appropriate infrastructure should be in place to service any development proposed and authorised during the lifetime of the particular plan. In particular, appropriate wastewater treatment, water supply, surface and storm water drainage, transport, waste management, community services and amenities etc. should be planned and phased to address any current problems or deficits and to reflect predicted increases in population. (Amend0035)

## **6.6 PA077**

1. Consideration should be given to ensuring that any proposed development which may arise out of the Proposed Amendments takes into account the findings of the Flood Risk Assessments conducted for the County including the Dodder and CFRAMS where relevant and appropriate. (Amend0035)
2. PA077- Comment in relation to the Reference to the DoEHLG Draft Flood Risk Management Guidelines (2008) in the first paragraph should be amended to refer to the published guidelines (November 2009) (Amend0035)

## **7 A Connected Place - 2.4 Environmental Services**

### **7.1 Invalid – Does not relate to a proposed amendment number**

1. Consideration should be given to the High Court ruling on 21.12.2009 (Judge McKechnie V Dublin City Council. (Amend0021))
2. The plan should commit to the full restoration, impending closure and capping of the Arthurstown site. (Amend0021)

### **7.2 PA078**

1. Seeks the addition of 'and incineration' at the end of Section 2.4.1. (Amend0033)

### 7.3 PA079

1. Request that a caveat is included to clarify that Biological Treatment does not include MBT plants producing fuel for incineration. ([Amend0033](#))
2. Contend the first bullet point in this section is superfluous as this matter is legislatively governed. To include such a point is to raise the question in every other section of the plan where the legislative requirement is not stipulated as to whether the plan's intent is to be contrary or selective with regard to the legislative requirement. This bullet point should therefore be deleted from section 2.4.2 Strategy for clarity and consistency: ([Amend0033](#))
3. PA079- Amendments welcomed. ([Amend0035](#))

### 7.4 PA080

1. Requests that this amendment be removed because it is not consistent with Waste Management Plan for the Dublin Region 2005-2010 and therefore should not be included in South Dublin Development Plan. ([Amend0028](#))
2. Requests that this amendment be removed because Industrial and healthcare facilities, including hospitals all used licensed hazardous waste contractors approved by the EPA for waste that requires incineration. ([Amend0028](#))
3. Requests that this amendment be removed because the National Hazardous Waste Management Plan 2008-2012 adequately provides for the industrial and healthcare sector. ([Amend0028](#))
4. Requests that this amendment be removed because the development plans of the other Dublin Authorities do not include any reference to facilitating industrial and healthcare companies, and it is clearly the remit of the EPA to determine the need for such facilities ([Amend0028](#))
5. Delete text reading "other than for industrial processes or health purposes" from proposed amendment to Section 2.4.3 Waste Management Strategy as it contradicts Incineration Policy elsewhere within the Plan. ([Amend0001](#))
6. The move towards sustainable and considered waste management and away from incineration is to be commended ([Amend0049](#))
7. Submit that this line is obviously a mistake and should be removed from the plan. ([Amend0049](#))
8. Objects to the inclusion of the Council's objective that no commercial or publicly-controlled incinerator other than for industrial processes or health purposes be built in South Dublin. ([Amend0027](#))

9. Objects to the inclusion of wording that supports incineration for health and industrial waste within the County and requests that this wording be deleted. Seeks clarification on what waste plan and targets are being specified in the proposed amendment. Targets should be highlighted. ([Amend0033](#))

### **7.5 PA081**

1. Proposes the re-introduction of the word 'further' into AMENDMENT REF. NO. PA081 as a solution to any concerns relating to current practices in the County so that the wording would be as follows; 'No further waste-to-energy incinerator or waste-to-energy thermal treatment facility will be situated in the County.' ([Amend0028](#))
2. This section is positive and will have a beneficial effect on the move to waste minimisation and recycling. ([Amend0049](#))

### **7.6 PA083**

1. Support for the replacing of 'composting' with 'biological treatment'. ([Amend0021](#))
2. Request that a caveat is included to clarify that Biological Treatment does not include MBT plants producing fuel for incineration. ([Amend0033](#))

### **7.7 PA086**

1. Welcome these sections and congratulate the Council on their commitment to avoiding the need to incinerate waste. ([Amend0049](#))

### **7.8 PA087**

1. Support for the replacing of 'composting' with 'biological treatment'. ([Amend0021](#))
2. Request that a caveat is included to clarify that Biological Treatment does not include MBT plants producing fuel for incineration. ([Amend0033](#))

## 7.9 PA089

1. Request that a caveat is included to clarify that Biological Treatment does not include MBT plants producing fuel for incineration. ([Amend0033](#))

## 7.10 PA090

1. We welcome the omission of the misnomer “waste to energy” option from this section. This will lead to actual recycling and waste minimisation efforts ([Amend0049](#))
2. Request that a caveat is included to clarify that Biological Treatment does not include MBT plants producing fuel for incineration. ([Amend0033](#))

## 7.11 PA092

1. This new policy requires clarification regarding the scale of non-residential development and the requirement to submit a Waste Management Plan. This policy should make reference to the following national policy: ‘Best Practice Guidelines on the preparation of Waste Management Plans for construction & Demolition Projects’ (June 2006) <http://www.environ.ie/en/Publications/Environment/Waste/WasteManagement/FileDownload,1481,en.pdf> appropriate to the scale of Development. Note the thresholds for developing Waste Management Plans are different to those proposed in the policy. This policy could be expanded to include provision or incentives within the Development Plan to encourage identification of the recycled content of materials on planning submissions to illustrate the applicant’s engagement with wider issues of sustainability. ([Amend0046](#))

## 7.12 PA094

1. The compounds referenced for monitoring should also include those emitted from the IPCC and Seveso plants within the County ([Amend0033](#))



## 7.13 PA237

1. Requests an amendment to Section 2.4.13 of the plan, other than as proposed in amendment PA237, to give more importance to the role of private waste operators in every aspect of waste management. ([Amend0021](#))
2. Request that a caveat is included to clarify that Biological Treatment does not include MBT plants producing fuel for incineration. ([Amend0033](#))

## ***8 A Connected Place - 2.5 Telecommunications and Energy***

### 8.1 PA096

1. Support for the amendments. ([Amend0024](#))

### 8.2 PA097

1. Objects to the requirement to undergrounding of all telecommunications cabling as it is an excessive and cost onerous requirement. Request that Policy EC1 be amended to reflect their concerns. ([Amend0024](#))

### 8.3 PA099

1. Significant concerns in relation to PA099 as the wording conflicts with the Governments Policy on Telecommunications and will prove an inhibitor for the efficient provision of a "smart economy" in the County. ([Amend0034](#))
2. This amendment is inconsistent and unclear, and is not supported in national policy and health issues are not a relevant land use planning consideration. ([Amend0034](#))
3. In relation to Kerry County Council, it has been proven that the refusal of telecommunications infrastructure based on exclusion zone policies are generally overturned on appeal by An Bord Pleanála. ([Amend0034](#))
4. The amended Draft Plan retains the policy of discouraging the location of antennas in residential areas and near primary and secondary schools and childcare facilities citing "protection of the health and well being of its citizens" as the reason for such discouragement. This is contrary to evidence found in the Irish Government's Expert Group on Health Effects of

- Electromagnetic Fields March 2007. It concluded that "no adverse short or long-term health effects have been found from exposure to RF signals produced by mobile phones and base station transmitters" ([Amend0034](#))
5. The amended Draft Plan retains the requirement to consult with educational facilities and adds a requirement to obtain agreement from management and parents. This is not based on any scientific evidence and would significantly undermine public confidence in the already tightly regulated public exposure limits. It also is acknowledged that this requirement would prove extremely onerous and has the capacity to delay rollout of infrastructure. The requirement for operators to ensure the "beam of greatest intensity" does not fall on educational facilities is not considered to be a factor for consideration by the Planning Authority. ([Amend0034](#))
  6. note the reference to the need to take into consideration possible impacts on any existing public right of way on page 78 at the end of the 3rd pt in the list of pts. We wonder could you stretch a point and include the same wording in a policy? This would bring the plan into line with Meath 4.11.4 – page 191 –1st para –4th line & DLR – 16.14 – last pt. Perhaps you could stretch a little bit further by adding: or walking routes to be consistent with 2.5.11 – Wind Energy 4th pt in list of pts. ([Amend0031](#))
  7. Request the omission of the bullet point that reads: "that the beam of greatest intensity from a base station does not fall...with the relevant body of the school or childcare facility..." as it is considered that its inclusion is motivated primarily by public concerns and its impact on young children, which are not within the remit of the Planning Authority. ([Amend0024](#))
  8. Request that the proposed insertions ('primary and secondary schools and childcare facilities' and 'that telecommunication masts shall not be located within 200m of any schools etc') as detailed fully in PA099 be deleted, or amended to reflect national planning guidelines. ([Amend0036](#))
  9. A request that the proposed insertion ('that the beam of greatest intensity...') as detailed fully in PA099 be deleted, or amended to reflect national planning guidelines. ([Amend0036](#))
  10. Objects to the inclusion of the Kerry County Development Plan 2009 policy, which promotes exclusionary zones. Requests that this be deleted. ([Amend0024](#))
  11. Request that Section 2.5.8 should be further amended to reflect the requirements of the Planning Authority role and the strategic direction provided by the Development Management Guidelines 2007. ([Amend0024](#))
  12. Objects to the inclusion of exclusion zone policies such as that of Kerry County Council. ([Amend0036](#))

## 8.4 PA100

1. Request the inclusion of the concept of auto-production and a framework for supporting applications by established and new commercial enterprises where auto-production generation is sought and request the inclusion of the following objective: support existing and established businesses and industries who wish to use wind energy to serve their own needs subject to proper planning and sustainable development. ([Amend0018](#))
2. This policy could be more focused including the provision for Map based assessments of renewable energy sources (existing and potential) to optimise utilisation for example define appropriate location of wind turbines etc. Note the following document: "Planning & Climate Change Coalition (October 2009) "Planning and Climate Change Coalition: Position Statement" published by the Town & County Planning Association [www.tcpa.org.uk](http://www.tcpa.org.uk) contains much detail regarding such mapping in addition to wider issues of climate change mitigation and planning for resilience. ([Amend0046](#))

## 8.5 PA102

1. Whilst the investigation of geothermal energy is laudable, this should not be tied into a requirement for residential development. ([Amend0049](#))
2. PA102- Promotion of geothermal energy welcomed. ([Amend0035](#))

## 8.6 PA104

1. While we support this we wonder could you, in 4th pt in list of pts, add: and walking routes? This would be consistent with 2.5.11. ([Amend0031](#))
2. PA104- Energy and Communications infrastructure in sensitive landscapes should also require Visual Impact Assessment to be carried out and that the Habitats Directive and EIA Directive requirements are addressed. ([Amend0035](#))

## **9 A Busy Place - 3.2 Enterprise and Employment**

### **9.1 Invalid – Does not relate to a proposed amendment number**

1. Comment requesting modification of Draft County Development Plan Index Map/ Map 3 to reduce the area of the 'Security Consultation Zone' to approximately 300 metres from the edge of Runway 05/23. (Amend0022)

### **9.2 PA106**

1. The changes to policy EE10, taken in context with proposed amendment paragraph PA012 (Section 0.4.7) would appear to indicate that in the absence of a Local Area Plan, mixed-use development on EP1 zoned lands could be guided by a wide range of plans. Seeks clarification. (Amend0050)

### **9.3 PA107**

1. PA107-Add the following sentence to proposed amendment- 'Offices 100-1,000sq.m and Offices over 1,000sq.m will be Permitted in Principle in Citywest Business Campus recognising the public transport provision and long established office use in this location' (Amend0006)
2. PA107- Support the comment made in the Environmental Report in relation to this policy, any such development should be conditional on good public infrastructure being in place. (Amend0026)
3. This is a retrograde step. There is sufficient properly zoned land in the county to allow for offices in suitable areas without this measure. (Amend0049)
4. PA107- Recommend that large-scale employment -intensive uses be located primarily within areas served by existing or planned high quality transport infrastructure, particularly favouring development within public transport corridors and within higher order urban centres which will benefit from rail based public transport. NTA would not support the inclusion of this policy as it could undermine the objective to focus employment intensive uses in proximity to rail nodes and higher order urban centres- the proposal to provide offices of over 1,000sqm in EP2 zoned areas appears to be in conflict with the objective of relocating lower employment intensive uses to these areas and could undermine the ability to redevelop

established areas, which seems to have formed the basis for rezoning of EP2 zoned lands in the first instance - recommend that the proposed amendment is not included in the development plan. ([Amend0041](#))

#### 9.4 PA109

1. Policy EE39: Restriction Area at Casement Aerodrome- area concerned is governed by the policy of the Department of Defence as a "no build area" and is the only military aerodrome in the state- norm applied to other airports not applicable- Casement is a military aerodrome, not an international airport. ([Amend0002](#))
2. Request that this amendment be deleted because Casement Aerodrome is not an international airport and is the only military airport in the country. Therefore standards applied to international airports are not relevant and the restrictions by the Department of Defence should be adhered to. State security should be an objective supported by the Council and should not be undermined by industrial development. ([Amend0028](#))
3. All references to the previous 'no-development restriction' should be removed from the plan or amended in accordance with the adopted Council motions. Request that Policy EE39 be amended or omitted from the plan. ([Amend0054](#) [Amend0053](#))

#### 9.5 PA110

1. Policy EE39A: Casement Aerodrome- Security Consultation Zone. Council would be acting outside its remit to amend the Dept. of Defence policy to maintain the current restricted area of 400 metres. ([Amend0002](#))
2. Policy EE39A: Casement Aerodrome - Security Consultation Zone- The Dept. of defence would be the lead organisation in any consultations and any application would be subject to agreement of the Department prior to any grant of permission ([Amend0002](#))
3. Policy EE39A: Casement Aerodrome- Security Consultation Zone. Application of 'Standard Security Measures' does not apply to Casement unlike other civilian airports mentioned- any standard security measures being applied following a consultation would have to be agreed to by the Dept. and the Military authorities prior to a grant of permission. ([Amend0002](#))
4. Policy EE39A: Casement Aerodrome - Security Consultation Zone. Department of Defence objects to the use of the phrase 'international best practice' –this is governed by the ICAO for civil aviation, this is not applicable to a military aerodrome and is at a relatively basic level. The Department would be prepared to accept a reference to 'best military practice'. ([Amend0002](#))

5. Welcomes, supports and notes amendment PA110 ([Amend0022](#))
6. Request that this amendment be deleted because Casement Aerodrome is not an international airport and is the only military airport in the country. Therefore standards applied to international airports is not relevant and the restrictions by the Department of Defence should be adhered to. State security should be an objective supported by the Council and should not be undermined by Industrial development. ([Amend0028](#))
7. Request that this amendment be deleted because Industrial development of these lands would reduce the amount of open space afforded to the villages of the Rathcoole and Newcastle. Currently the restrictions have enabled the villages to retain their village character as the scale, mass and height of development has been shaped by the requirements of the Department of Defence. ([Amend0028](#))
8. Request that this amendment be deleted because the area around Casement Aerodrome is not accessible by public transport and is not located along a public transport corridor. There is also no direct access onto the N7 for any proposed development in this site and any such access would not be allowed by the NRA. ([Amend0028](#))
9. Request that this amendment be deleted because we would question the need for more industrial development around this location as there is already an excess of vacant industrial units in the Greenogue industrial estate which is more than sufficient to meet the needs of industry. ([Amend0028](#))
10. Request that this amendment be deleted because Industrial development around Casement Aerodrome would have a negative impact on river systems in the area, many of which are already highly polluted. It would also negatively impact on biodiversity corridors established in the area as the green belt established by the Aerodrome contracts due to development. ([Amend0028](#))
11. PA110- Object to the policy, opens up Casement Aerodrome for civilian use, object to on grounds of environmental impact. ([Amend0026](#))
12. Concern relating to this section, the provision of a safety area and an exclusion area is a matter for the Irish Aviation Authority and, in the case of Casement Aerodrome, also for the Air and Defence Forces. ([Amend0049](#))
13. The submission contends that the zoning of the land within the security consultation zone between Greenogue Business Park/Aerodrome Business Park and the Airfield on the western and southern sides should be changed in line with the rezoning proposed under PA228, reflecting the changes to the security zone restrictions at Casement Aerodrome under PA110. ([Amend0012](#))
14. Support for this amendment. ([Amend0054](#) [Amend0053](#))
15. Requires a clear statement that the Department of Defence Security Zone Restriction around Casement Aerodrome has been amended to become a Security Consultation Zone. Contends that proposed amendments made to Policy EE39A are

made up of incomplete parts of two different motions (Motions 239 and 242) and therefore 'dilutes' the thrust of the motions adopted. Requests that the policy be amended to reflect the motions adopted by the members of the Council. (Amend0054 Amend0053)

## 9.6 PA111

1. Support for the amendment proposed in reference no. PA111. (Amend0009 Amend0010)
2. With reference to policy EE40:, the Council should not have a policy regarding the reclassification of runways (Amend0049)
3. Objects to the change of classification of Weston Executive Airport. A local authority has no role or function in the classification of airports and is therefore ultra vires. The amendment should be deleted. (Amend0047)

## 9.7 PA112

1. Amend the proposed amendment to section 3.2.22 to replace the corresponding sentence with the following: "However, within the 'red zones', some development is permissible whereby the development could not reasonably expect to increase the number of people living at the property subject to the approval of the Department of Defence." (Amend0028)
2. Concern relating to this section, the provision of a safety area and an exclusion area is a matter for the Irish Aviation Authority and, in the case of Casement Aerodrome, also for the Air and Defence Forces. (Amend0049)
3. Support for this amendment. (Amend0054 Amend0053)
4. Requests that the criteria for determining the acceptability of development within the red zones should be in accordance with national and international best practice, as applied at Dublin, Cork and Shannon airports. (Amend0054 Amend0053)

## 9.8 PA113

1. Seeks further reduction to the proposed consultation distance for development proximate to the Irish Distillers and Tibbet & Britten Group sites (on the basis that the development potential of the Electrolux site could be adversely affected). (Amend0050)

## **10 A Busy Place - 3.3 Town, district and Local Centres**

### **10.1 Invalid – Does not relate to a proposed amendment number**

1. Comment requesting amendments to Policy TDL34. ([Amend0051](#))
2. Comment regarding the higher density development design strategy of Clonburris. ([Amend0033](#))
3. Seeks the inclusion of an objective in the plan to help solve the problems associated with the Esso Site in Tallaght. ([Amend0027](#))

### **10.2 PA116**

1. PA 116- The historical conservation area should be renamed & appointed as the cultural quarter of the county town. There is no need to create a new "cultural" area. ([Amend0014](#))
2. Request that the design statement for Tallaght village be further developed to ensure a 360 view is taken when adopting design cues. ([Amend0014](#))
3. Seeks a Village Design Statement for Tallaght Village and the application of tenure mix to an area around Tallaght Village - having regard to rental accommodations schemes, minimum residential units, social housing, private housing, filling empty apartments, no more apartment development (to be explicitly stated in plan), develop Tallaght as a heritage village, a pedestrian friendly and cycle friendly village, retention of bus services, reuse of vacant buildings, take advantage of its prime location, retention of individual identity. ([Amend0027](#))

### **10.3 PA117**

1. Classifying Tallaght as an Education city is an excellent idea, however the attempt to tack on the redevelopment of the Citywest Institute cannot be allowed. ([Amend0049](#))



## 10.4 PA120

1. Support for the inclusion of Lucan Village Design Statement policy and would support further initiatives for Rathcoole and Newcastle. ([Amend0049](#))
2. Amend PA120 so that the new policy includes acknowledgement of and continued support for existing businesses within the Lucan Village area, including provision for their expansion and upgrading. ([Amend0030](#))
3. PA120- should refer to the sustainable development of Lucan Village. ([Amend0035](#))

## 10.5 PA122

1. PA122/125- should refer to the sustainable development of Templeogue Village. ([Amend0035](#))

## 10.6 PA123

1. Requests that existing text in draft plan reading "The prime villages in the County include Rathcoole, Newcastle-Lyons and Saggart." be retained. Also insert "to be completed by 2011" after "...each of the rural villages" in the proposed amendment. ([Amend0028](#))

## 10.7 PA125

1. Welcome any attempt to limit ribbon development and the blight of one-off housing. Any serviced sites that the Council prepares should be part of an existing consolidated development, with connections to mains water and sewerage and as part of a plan to develop an area. Any move in this regard should be subject to the normal public scrutiny and through the normal planning process. Including appropriate assessment. The use of Council land for this purpose must go through the full public consultation and the planning process ([Amend0049](#))

## **11 A Busy Place - 3.4 Retail**

### **11.1 PA126**

1. Convenience stores (e.g. Spar, Centra), as envisaged by Section 3.4.3.iii in its description of Local Shops/Small Villages, would be unviable at 100sqM and also would not provide sufficient service to deter people from making car-borne trips as opposed to walking to their local centre. They do not fall under the 'discount' category. (Amend0046)
2. Support for the maximum size of a supermarket or discount foodstore being 1,500m<sup>2</sup>. (Amend0046)
3. Tesco Ireland strenuously opposed to this amendment, it would compromise future redevelopment/regeneration proposals at existing Tesco operations at Rathfarnham Shopping Centre and Hillcrest Shopping Centre in Lucan (Designated Local Centres) as well as other Local Centres which have the potential for redevelopment and rejuvenation. The amendment would cap convenience floorspace at the centres below existing levels, seriously undermining existing operations; the investment in the stores may be lost. Amendment proposes to further restrict provision of retailing and particularly foodstores at designated Level 4 Local Centres. The proposed amendment and other restrictive retail policies within the draft plan may result in the creation of a very restrictive retail planning framework within South Dublin and the approach would result in no policies being provided within the Development Plan to encourage the provision of convenience retail shopping facilities within established Local Centres. If adopted the amendment would undermine existing development and employment at Tesco Stores and prevent the future redevelopment / regeneration, it would encourage a continuous decline in the vitality and viability of established Local Centres, and seriously undermine the ability of retail operators to respond to demand for convenience retail floorspace in areas underserved by foodstore developments. GDA Retail Strategy states that "Councils should assess local centres (Level 4 and 5) to assess whether they need to change level and/or zoning policy to ensure their viability and that they meet the needs of the surrounding community"- the Retail Strategy does not provide a rigid retail planning framework and sufficient flexibility exists to provide for varying sizes of level 4 centres- the proposed amendment would act as a barrier to any future redevelopment at existing centres. The proposed amendment is not in accordance with the policy provisions of the GDA Retail Strategy- which outlines that Level 4 Neighbourhood Centres will normally provide for one supermarket or discount foodstore ranging in size from 1,000-2,500sqm while the proposed amendment proposes to introduce a floorspace cap of 1,000-1,500sqm. Proposed rewording " These centres usually provide for one supermarket or discount foodstore generally ranging in size from 1,000-2,500sqm with a limited range of supporting shops..... "A general rule cannot be applied to all Level 4 Centres within South Dublin. A number of Level 4 Centres provide for foodstores in

excess of 2,000sqm and, therefore cater for a wider catchment area than neighbourhood centres. Proposals for increased retail floorspace at these locations will be considered on a case by case basis." Propose there is scope to provide a "bespoke/hybrid zoning objective applied to Local Centres to ensure that a blanket approach is not applied to all Level 4 Local Centres. ([Amend0044](#))

## **12 A Protected Place - 4.2 Archaeological and Architectural Heritage**

### **12.1 PA132**

1. Comment in relation to flood lighting the Ballymount Gatehouse. ([Amend0014](#))
2. Comment regarding the inclusion in the RPS of all structures listed with regional significance in the database of the National Inventory of Architectural Heritage. ([Amend0033](#))

### **12.2 PA133**

1. Support this amendment. ([Amend0031](#))

### **12.3 PA134**

1. It is a welcome to see that the Council is moving to protect both archaeological and recorded monuments as well as the environs and settings for these monuments. ([Amend0049](#))

### **12.4 PA135**

1. Propose that the full expanse of weirs, mills and cottages on the river Liffey should be designated an Architectural Conservation area(s), ACA in particular recognition of their historical, cultural, technical and social interest ([Amend0032](#))

## ***13 A Protected Place - 4.3 Landscape, Natural Heritage and Amenities***

### **13.1 PA136**

1. Support this amendment. ([Amend0031](#))
2. Concern regarding motions which the LVPA understood were passed and should be reflected in the proposed amendments eg. walking routes should not be allowed to adversely impact on biodiversity or the landscape and flood -relief and prevention measures should be informed by biodiversity and landscape consideration, do not appear to reflected in the amendment document. ([Amend0032](#))

### **13.2 PA137**

1. Support this amendment. ([Amend0031](#))
2. This is a very short list of Views and Prospects for a county that has such a range of natural attractions. The Council does not appear to value the views and prospects in its county. ([Amend0049](#))

### **13.3 PA138**

1. Support this amendment. ([Amend0031](#))
2. The LVPA is conscious of the many herb-flora species listed in the red-data book and subject to Flora Protection Orders FPO in the Liffey Valley. The location of these should be detailed so as to ensure their proper protection and this appears to be a serious omission in the plan and in the environmental report. ([Amend0032](#))
3. PA138- Amendment is welcomed. ([Amend0035](#))

### **13.4 PA139**

1. Suggest that you should reconsider the time limit of "during the lifetime" provided for in each of these policies. Would you consider three years of adoption? These policies are all carried forward from the 2005 Plan (and maybe from Plans prior to that.) This means that it could be as long as 12 years before any further progress is made. ([Amend0031](#))

2. We submit that you should delete "and subject to available resources". There are many other policies in the Plan which will require to be funded. We submit you that shouldn't single out these policies. ([Amend0031](#))

### 13.5 PA140

1. Suggest that you should reconsider the time limit of "during the lifetime" provided for in each of these policies. Would you consider three years of adoption? These policies are all carried forward from the 2005 Plan (and maybe from Plans prior to that.) This means that it could be as long as 12 years before any further progress is made. ([Amend0031](#))
2. PA140- welcome the acknowledgement of the importance of the SAAO however objectives are very unspecific and vaguely articulated. Suggest wording as follows: "Undertake steps and works necessary to secure an extension of the current Liffey Valley SAAO- in both length and width in order to: A) provide for more effective protection for the lands within the SAAO which has been defined in too narrow and short parameters to effect any real protection to the lands; and B) to provide for lands adjoining the current SAAO which warrant a similar level of protection." ([Amend0032](#))
3. We submit that you should delete "and subject to available resources". There are many other policies in the Plan which will require to be funded. We submit you that shouldn't single out these policies. ([Amend0031](#))

### 13.6 PA141

1. Suggest that you should reconsider the time limit of "during the lifetime" provided for in each of these policies. Would you consider three years of adoption? These policies are all carried forward from the 2005 Plan (and maybe from Plans prior to that.) This means that it could be as long as 12 years before any further progress is made. ([Amend0031](#))
2. Submit that you should delete "and subject to available resources". There are many other policies in the Plan which will require to be funded. We submit you that shouldn't single out these policies. ([Amend0031](#))

### 13.7 PA142

1. ([Amend0031](#))
2. We submit that you should delete "and subject to available resources". There are many other policies in the Plan which will require to be funded. We submit you that shouldn't single out these policies. ([Amend0031](#))

### 13.8 PA143

1. Suggest that you should reconsider the time limit of "during the lifetime" provided for in each of these policies. Would you consider three years of adoption? These policies are all carried forward from the 2005 Plan (and maybe from Plans prior to that.) This means that it could be as long as 12 years before any further progress is made. ([Amend0031](#))
2. The Council should look to expand its policy's horizons past the bounds of this report and provide real protection for the valley; which is one of Dublin's natural treasures. ([Amend0049](#))
3. We submit that you should delete "and subject to available resources". There are many other policies in the Plan which will require to be funded. We submit you that shouldn't single out these policies. ([Amend0031](#))

### 13.9 PA144

1. Policy LHA9 Impacts on Natura 2000 Sites is legally incorrect at law as it does not fully reflect the provisions of Article 6 of the Habitats Directive in that it does not have regard to Article 6(3). ([Amend0003](#))
2. Concern in relation LHA9. It is recommended that the proposed policy should be reviewed and redrafted so as to fully reflect and be consistent with the relevant provisions of the European Communities (Natural Habitats) Regulations, 1997 ( S.I. No 94 of 1997). ([Amend0040](#))

### 13.10 PA145

1. Support this amendment ([Amend0031](#))

### 13.11 PA146

1. PA146 - Request deletion of all references to the Dublin Mountain Area, Mountains Area or Development Plan Zoning Objective H from the Policy LHA13. ([Amend0017](#))
2. Support this amendment ([Amend0031](#))

**13.12 PA148**

1. Support this amendment ([Amend0031](#))

**13.13 PA149**

1. PA149- Amendment is welcomed. ([Amend0035](#))

**13.14 PA151**

1. Support this amendment ([Amend0031](#))

**13.15 PA152**

1. Welcome this proposal we submit that it fails to acknowledge the importance of the Canal for recreation – in particular walking and cycling. The absence of a positive attitude to cycling by Waterways Ireland has always been greatly disappointing. Of course, we totally oppose any proposal, other than provision of a cycleway, which would impinge on the tow path and the hedgerows and trees bordering the canal must be protected. We submit therefore that you should delete on 3rd line primarily as a natural biodiversity resource and substitute both as a natural biodiversity resource and as a recreational resource (particularly for walking and cycling). ([Amend0031](#))
2. We would reference the devastation visited upon the Grand Canal in the creation of a cycling and pedestrian route. We hope that policy LHA22 will remind the Council of the requirement to preserve the Grand Canal pNHA and its biodiversity, which includes a number of species protected under both the Habitats and Birds Directives ([Amend0049](#))

**13.16 PA153**

1. Support this amendment. ([Amend0031](#))

### **13.17 PA155**

1. Support this amendment. ([Amend0031](#))
2. Comment regarding the linking of the Liffey Valley with the Wicklow Way. ([Amend0033](#))

### **13.18 PA156**

1. Support this amendment. ([Amend0031](#))

### **13.19 PA157**

1. Welcomes greater protection of the Liffey Valley. ([Amend0049](#))
2. PA157- Appears to be correct. ([Amend0032](#))

## ***14 Local Zoning Objectives***

### **14.1 PA160**

1. In relation to the reclassification of zoning land at Greenogue from EP2 to EP3 point out that these locations do not have good access to the major road network as required by the EP3 classification. ([Amend0028](#))

### **14.2 PA161**

1. Requests amendment to proposed new LZO to amend cap on number of hotel bedrooms from 150 to 200 to ensure the provision of a 4 star hotel as opposed to a 3 star hotel. This amendment would not require any additional floor area or additional height. ([Amend0039](#))
2. PA161- Justification should be given regarding the need for a proposed hotel complex as part of the proposed Spawell, Templeogue- Mixed Use Development. ([Amend0035](#))



### 14.3 PA163

1. This proposal would require clarification and an EIS. The creation of a marina at Hazelhatch could be very detrimental to the area. We would not be in favour of this. ([Amend0049](#))
2. Objects to the inclusion of the LZO as it would result in major damage to the canal. ([Amend0033](#))

## 15 *Specific Local Objectives*

### 15.1 PA180

1. The NRA maintains its view that Specific Local Objectives 58 and 59 are inappropriate in view of their implications for the capacity, efficiency and operation of the N7 in the area. ([Amend0023](#))

### 15.2 PA183

1. This objective may have implications on the locality. We are opposed to this in principle. ([Amend0049](#))

### 15.3 PA184

1. NRA agreeable to liaise further with the Council, though there is a presumption against reopening considering the upgrade of the N4 Lucan Bypass and potential traffic and safety implications. ([Amend0023](#))

### 15.4 PA188

1. Whilst we agree with the creation of a masterplan to dictate the development of an area, we note that there are a number of worrying phrases in this SLO such as: community gain. Concerns include already zoned land, pNHA, and reference to the 12th Lock should be removed. ([Amend0049](#))
2. Support for proposed new SLO – 12th Lock Masterplan subject to the following changes: • The Grand Canal Way should be developed on the north side from the 12th Lock westward to Hazelhatch but not on the south side • The introduction of a

traffic control facility for cyclists safety at the 12th Lock Bridge • The inclusion of the 3-storey mill building should be included within the list of Protected Structures • The Grand Canal should not be used as a flood relief route. (Amend0045)

3. Amend the first bullet point to exclude both references to the Grand Canal. Include a caveat to the second bullet point to ensure the impacts from any restoration work etc are not allowed to impact on the pNHA or the protected habitats and species of the Grand Canal. (Amend0033)
4. PA188- Attention drawn to the requirements under the SEA and Habitats Directives with regard to screening for significant environmental effects. (Amend0035)

### **15.5 PA195**

1. PA195- Request consultation with and approval of NRA prior to Council proposing any measures affecting N4 National Primary Route. (Amend0023)
2. Requests that the proposed amendment be omitted as following completion of the M50 and N4 road improvement works, traffic flows on the N4 are such that it is not possible to develop a new access from the N4 directly into the Liffey Valley Town Centre area, and the new free flow arrangements on the N4/M50 means there is no longer congestion and the cause of rat running through Palmerstown has been eliminated. (Amend0048)

### **15.6 PA197**

1. PA 197- Proposed heritage centre for the Dodder Valley should be amended to be located at Old Bawn weir to maximise the access to / from the centre & to leverage from existing retail, parking, access and historical activities & amenities (Amend0014)
2. Done sensitively, this could be an excellent idea. (Amend0049)

### **15.7 PA198**

1. While we support this we submit that at the very least you should provide that action plan should be completed within the lifetime of the Plan. This then would be consistent with 139-143. (Amend0031)

### 15.8 PA199

1. PA 199: The amendment as proposed in the adopted motion on LAP for Fortunestown Way provided that the LAP was "to commence within 6 months of the adoption of the new County Development Plan". This time limit should be reflected in the adoption of the new county development plan. (Amend0005)

### 15.9 PA200

1. PA200- Proposal located in a Green Belt and nursing homes are only open for consideration in existing premises under this zoning. (Amend0026)

### 15.10 PA201

1. This is confusing; we hope that any further development will be subject to the normal planning process and scrutiny. (Amend0049)
2. Seeks clarification whether or not there is a 'revised' site development brief for Monastery Road and if not, requests that the wording of the SLO be amended to read "...shall be subject to a revised Site Development Brief..." Seeks clarification on what are the changed circumstances that would require a revised development brief and contends that it is unnecessary to prepare a new brief. Objects to the 'vague' reference "to be approved at a later date by South Dublin County Council" as it gives rise to uncertainty. Requests therefore that the SLO be amended as follows: (Amend0052)
3. The following mixed uses to be permitted in principle: residential, community facility, crèche, enterprise centre, health centre, offices in excess of 100m<sup>2</sup>, recreational facility and shop-neighbourhood. Development proposals for the lands to be subject to 'Lands at Monastery Road Site Development Brief' approved by the Council in November, 2007, or to an amended development brief to be agreed with the planning authority during the planning application process. (Amend0052)

### 15.11 PA203

1. Request for an amendment of PA203 to add the following sentence at the end of the proposed new SLO: Applications for minor development, such as small extensions to houses, and most changes of use of existing buildings and or extensions

and additions to existing commercial and industrial enterprises, are unlikely to raise significant flooding issues, and will therefore be acceptable in principle subject to appropriate flood risk assessment and mitigation, where necessary.

(Amend0030)

2. Current and future land zoning and development should have regard to the finding of the current and future flood risk assessment studies to be conducted to identify vulnerable areas and promote appropriate land use in all instances. (Amend0035)
3. PA203- Reference to Dodder CFAMS noted, consideration should be given to amending the first paragraph as follows "...floodplain maps are to be integrated into any planning decision, where appropriate along with..." (removal of the text taken into account). (Amend0035)

#### **15.12 PA204**

1. submit that you should include cycle ways. (Amend0031)
2. Objects to the inclusion of the SLO as it would result in major damage to the canal. (Amend0033)

#### **15.13 PA206**

1. PA206- note this objective and state that RPA are willing to engage with SDCC in this matter. (Amend0029)

#### **15.14 PA207**

1. Requests consultation with and approval of NRA prior to Council proposing any measures relating to Boot Road that would affect the Newlands Cross Junction Upgrade scheme. (Amend0023)

## **16 Schedule 2 - Record of Protected Structures**

## **17 Schedule 3 - Definition of Use Classes**

### **17.1 PA210**

1. 4.06 The RIAI Proposes a revision to amendment PA210 as follows: Shop – Neighbourhood This category includes smaller shops giving a localised service in a range of retail trades or businesses, such as butcher, grocer, newsagent, hairdresser, ticket agency, dry cleaning or launderette, and designed to cater for normal neighbourhood requirements. It also includes a small supermarket on a scale directly related to the role and function of the settlement and its catchment, and not exceeding 1500sqM in gross floor area. ([Amend0046](#))

## **18 Schedule 4 - Casement Aerodrome Baldonnell**

### **18.1 PA211**

1. Item 2- it is the policy of the Dept. of Defence that the distance within which no development is allowed on lands lying under the approaches to runway 05/23 is 1,350 metres- the Dept. will continue to ensure that this is enforced. ([Amend0002](#))
2. Welcomes, supports and notes amendment PA211 ([Amend0022](#))
3. Amend the proposed amendment to section 2 of the Explanatory Note to Schedule 4 to replace the corresponding sentence with the following: "However, within the 'red zones', some development is permissible whereby the development could not reasonably expect to increase the number of people living at the property subject to the approval of the Department of Defence." ([Amend0028](#))
4. Request modification to text on page 266 of Draft Plan in the interests of clarity to read: "Casement Aerodrome is the only secure military aerodrome in the State. The requirement for such a facility has been underlined by its use for the highest level intergovernmental tasks and for sensitive extraditions. The arrivals area is not overlooked from any building in close proximity and consequently, there is a requirement to continue the limitation of development in close proximity to that area and to the aerodrome runways." ([Amend0022](#))

5. As a result of Amendment PA211, we would ask that the Planning Authority revisit the proposal to rezone this edge of land from 'B' to 'EP2'. It is the last remaining small parcel of land (c.1ha in extent), which forms part of the larger Profile Park landholding zoned for employment and economic development. (Amend0037)
6. Objects to the change in height restriction in the vicinity of Casement and other changes that facilitate the rezoning of land along the Naas Road and request that these amendments be deleted. (Amend0033)
7. Support for this amendment to Schedule 4. (Amend0054 Amend0053)
8. Requests clarification that the motions adopted by the members of the Council, which intended that development would be able to proceed on zoned lands within the security zone, subject to conforming with appropriate security arrangements for such locations are reflected in the plan. (Amend0054 Amend0053)
9. The amendment to this paragraph allows for some limited development to be permitted in principle in the red zoned. Therefore the phrase that states "within which no development is allowed" should be amended to reflect this change. (Amend0054 Amend0053)
10. Requests that the criteria for determining the acceptability of development within the red zones should be in accordance with national and international best practice, as applied at Dublin, Cork and Shannon airports and that Schedule 4 should be amended to reflect this. (Amend0054 Amend0053)
11. Contends that proposed amendments made to Schedule 4 are made up of incomplete parts of two different motions (Motions 239 and 242) and therefore 'dilutes' the thrust of the motions adopted. Requests that the schedule be amended to reflect the motions adopted by the members of the Council; such as "that development of these lands is now permitted in principle, subject to conditions on scheme design addressing security." (Amend0054 Amend0053)
12. Requests the omission of any reference to 'restricted area' and any reference to an 'objection to planning permission'. (Amend0054 Amend0053)
13. Believes that the paragraph "Casement Aerodrome is the only secure military aerodrome in the State.....the limitation of development in that area and in close proximity to the aerodrome boundary." Is in conflict with the agreed motions 239 and 242 and should be amended. (Amend0054 Amend0053)
14. The conclusion paragraph of Schedule 4 refers to prohibition and restriction of development. Request for amendments to be made to this paragraph to reflect the decision made by the Council members. (Amend0054 Amend0053)
15. The South Dublin Chamber welcomes the positive changes made to the security arrangements at Casement Aerodrome, Baldonnell, brought about by the Amendment Ref. No. PA110 and the Amendment Ref. No. PA211. believe that implementation of a Security Consultation Area around and outside the aerodrome boundary will be effective and indeed that it will improve on the current arrangements in place at Casement Aerodrome. (Amend0056)

16. Concerned though that there is the possibility for interpretations other than those which the changes to the development sought to clarify and to this end we would urge that the development plan provide clarity and remove ambiguity in areas -For example, there are some amendments required to the Development Plan text to remove some outdated references in regard to the Red Zones, carried over from the previous Development Plan text. (Amend0056)
17. The Chamber believes that following the Council Motions debated in relation to Casement Aerodrome, there was a clear understanding that the intended consequence of passing the Motions was that when development was proposed within the security zone, on zoned lands, that development would be able to proceed subject to conforming with appropriate security arrangements for such locations; being largely matters that need careful design input to a scheme. This clarity is needed to prevent future misunderstanding or misinterpretation. (Amend0056)

### ***19 Schedule 5 - Weston Aerodrome, Lucan***

### ***20 Schedule 6 - Housing Strategy***

#### **20.1 PA213**

1. Seeks clarification on the housing target figures in Table 4.5 of the Housing Strategy. (Amend0033)
2. PA213-Commentary on the national Population projections should be reworded to reflect that a substantial reversal from recent migration trends is likely to pertain over the plan period. Table 4.2-The population forecasts from the RPG 2010-2022 are compared to the DoEHLG forecasts 2007, which have been superseded by 2009 projections- this table should be amended to reflect this. The RPG national total for 2016 appears to be incorrect- the figure should be 4,997,000. Recommended that the commentary on national population projections is reworded as set out to reflect current migratory trends and the population forecast table should be revised to provide the correct figures. (Amend0041)

## **21 Appendix 7 - Strategic Environmental Assessment and Appropriate Assessment Processes**

### **21.1 PA214**

1. The overall quality of the Environmental report is so low that there is a severe danger that the plan cannot be made legally – due to a lack of compliance with the SEA regulations. (Amend0049)
2. There is little mention of the Metro West in the Environmental Report, yet the route will, almost certainly cross the Liffey Valley Special Amenity Area Order (SAAO) and we note that Council Policies LHA4 -LHA7 seek to protect the Valley. (Amend0049)
3. We question the depth and quality of the environmental report. In the last phase of the plan, every occurrence of the phrase “have regard to” has been changed to read “as far as is practicable, be consistent with” however the commentary in the environmental report is almost consistently: “The Proposed Amendment would not change the assessment provided in the Environmental Report.” (Amend0049)
4. We note in the environmental report, specific policies in relation to valuing national designations of protection and locally significant sites, we believe that there is an insufficient emphasis on the 'wider countryside measures' as detailed in European Court of Justice rulings to protect biodiversity, and also an insufficient recognition that there is more to the Habitats directive than Articles 3 through to 6. (Amend0049)
5. As part of an SEA there should be detailed in the plan a list of all areas in the county that contain Red Book species, and plants subject to a Floral Protection Order (Amend0049)
6. It is not clear in the SEA how the Liffey CFRAMS is going to be addressed. This area needs to be clarified. (Amend0049)
7. We do not believe that the Liffey's status as a salmonid river has been considered adequately in the Plan or in the Strategic Environmental Appraisals (Amend0049)
8. SEA Environmental reports assessment of the proposed alteration to QBC's is inadequate in assessing the impact of the proposed change in terms of noise, dust, emissions etc. (Amend0049)
9. The use of national plans whose legitimacy is under question, given their own lack of conformance to SEA such as Transport 21 is somewhat at odds with the Council's own specific attempts to comply with legislation. (Amend0032)
10. Acknowledged gaps in the SEA need to be addressed in terms of how these gaps will be filled and how the Plan and Environmental report will be managed in the context of the emerging information. (Amend0033)



11. It is a matter for SDCC to determine whether or not the implementation of the Proposed Amendments would be likely to have a significant effect on the environment. Refer to criteria set out in Annex II of the Directive 2001/42/EC - SEA Directive and Schedule 2A of the P&D Regs 2004. (Amend0035)
12. SDCC Obligated to take the relevant criteria set out in Schedule 2A of the P&D Regs 2004 into account in making its decision as to whether or not the Proposed Amendments would be likely to have significant effects on the environment and it should be clarified if the Proposed Amendments have been screen for likely significant effects, including cumulative effects. (Amend0035)
13. Noted that a number of proposed Amendments are described as having potential for negative environmental effects prior to mitigation measures being established: (Policy TDL28(B),LZO164, PA227 and PA228). SDCC should ensure that the proposed amendments do not conflict with policies/objectives in the Draft Regional Planning Guidelines for the Greater Dublin Area 2010-2022. (Amend0035)
14. Clarification required to the extent to which Flood Risk Assessment has been undertaken in accordance with the relevant Flood Risk Management guidelines. (Amend0035)
15. Clarify how the AA screening has taken into account potential 'in-cimbination' effects and cumulative effects as a result of a number of the proposed amendments, as identified in the Environmental Report. (Amend0035)
16. Referred to the requirement to prepare an SEA statement outlining "Information on the Decision" as required by Article 13I of the Planning and Development Regulations and a copy of such should be sent to any Environmental Authority consulted during the EA process. Summarising the flowwing; How environmental considerations have been integrated into the plan; How the environmental report, submissions, observations and consultations have been taken into account during the preparation of the plan; The reason for choosing the Plan adopted in light of other reasonable alternatives dealt with; and The measures decided upon to monitor the significant environmental effects of the implementation of the plan. A copy of the SEA statement with the above information should be send to any Environmental Authority consulted during the SEA process. (Amend0035)

## ***22 Appendix 8 - Bohernabreena Study***

## ***23 Appendix 9 - The European Charter of Pedestrians' Rights***

### **23.1 PA238**

1. We submit that you have failed to include an Appendix reproducing the European Charter of Pedestrian Rights as provide on page 102 of the Draft – 2nd pt in list of pts. ([Amend0031](#))
2. PA238- Recommend that the Draft is amended to show how the European Charter of Pedestrian Rights has influenced the plan's polices as it is unclear in what manner the Charter has influenced the County's Policies on walking and pedestrians. ([Amend0041](#))

## ***24 Mapping***

### **24.1 Invalid – Does not relate to a proposed amendment number**

1. The submission requests that the council clarify that the proposal in their previous submission of the 2nd December 2009 did not include a proposal for the rezoning of land within the Casement Aerodrome approach area or restriction zone. ([Amend0011](#))
2. Proposals to rezone existing filling station sites at both Glenview and the Blessington Road. ([Amend0030](#))
3. Comment regarding the crossing of the Liffey by the proposed Metro West route. ([Amend0033](#))
4. Comment regarding an alternative site for the green waste facility in Lucan. ([Amend0033](#))

### **24.2 PA217**

1. PA217- Support this amendment. ([Amend0026](#))

### 24.3 PA218

1. In the interest of clarity, requests that isochrones indicating which sites fall within the consultation distances of the Seveso sites are transposed onto the amended draft development plan maps. (It is unclear whether the proposed consultation distances should be measured from the perimeter or from centre of the sites.) ([Amend0050](#))

### 24.4 PA227

1. PA227- Object to amendment on grounds that Environmental Report states that this is a flood plain and rezoning would be in contradiction with other policies and objectives in the Draft Plan. ([Amend0026](#))

### 24.5 PA228

1. Request that this amendment be deleted because the area around Casement Aerodrome is not accessible by public transport and is not located along a public transport corridor. There is also no direct access onto the N7 for any proposed development in this site and any such access would not be allowed by the NRA. ([Amend0028](#))
2. Request that this amendment be deleted because we would question the need for more industrial development around this location as there is already an excess of vacant industrial units in the Greenogue industrial estate which is more than sufficient to meet the needs of industry. ([Amend0028](#))
3. Request that this amendment be deleted because Industrial development around Casement Aerodrome would have a negative impact on river systems in the area, many of which are already highly polluted. It would also negatively impact on biodiversity corridors established in the area as the green belt established by the Aerodrome contracts due to development. ([Amend0028](#))
4. Request that this amendment be deleted because Industrial development of these lands would reduce the amount of open space afforded to the villages of the Rathcoole and Newcastle. Currently the restrictions have enabled the villages to retain their village character as the scale, mass and height of development has been shaped by the requirements of the Department of Defence. ([Amend0028](#))
5. Welcomes, supports and notes amendment PA228 ([Amend0022](#))
6. Concern in relation to the impact on policy T19, and the Camac River. ([Amend0049](#))

7. Objects to the extent of new zoning of industrial land on the Naas Road. Development lands beyond a 6 year horizon should not be zoned for development. (Amend0033)
8. Recommends that the lands zoned for enterprise and employment in the south, north and east of Baldonnell Airport are not provided for in the development plan in the absence of an explanation for the requirement of this additional zoned land. (Amend0041)
9. Support for the changes made to zoning related to Casement Aerodrome. (Amend0054 Amend0053)
10. Request that the legend be amended to refer to 'Security Zone Restrictions' rather than 'Security Consultation Zone'. (Amend0054 Amend0053)
11. Seeks clarification that the dark outline indicating Public Safety Zones shown on the digital copy maps, in the shape of a PSZ, is an indication only of the space within which the amendment has been made. (Amend0054 Amend0053)
12. Support PA228 (Amend0056)





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