

# **Ballycullen - Oldcourt Local Area Plan**

## **Manager's Report on Submissions Received During Pre-Draft Consultation Programme**

## **Introduction**

The southern fringe of Ballycullen - Oldcourt comprises a belt of lands that stretches across the foothills of the Dublin Mountains, which forms a buffer between the suburban area to the north and the Dublin Mountains to the south.

The area benefits from views of its suburban hinterland while retaining a unique semi-rural setting and mountainous backdrop that is potentially rich in archaeology, biodiversity and heritage.

Circa 110 hectares of this rural-suburban fringe has been zoned for development under previous County Development Plans and the current County Development Plan. An Action Area Plan was prepared for part of these lands in 2000.

While development has commenced along Stocking Avenue on the eastern side of the Ballycullen-Oldcourt fringe, a significant amount of zoned lands remain undeveloped (circa 85%). Most of the development that has taken place occurred in the last 10 years and remains incomplete. A significant quantum of permitted residential development is also yet to commence along or off Stocking Avenue.

The slowdown in pace of development creates an opportunity to carry out an updated assessment of the current situation for the entire area and formulate an expanded Local Area Plan that reflects changing economic and social circumstances in a comprehensive manner. Consultation that was undertaken for the preparation of a plan for Oldcourt in 2006 has been utilised to identify emerging issues.

## **Strategic Environmental Assessment and Appropriate Assessment**

The Planning Authority is of the opinion that the production of a Local Area Plan for Ballycullen-Oldcourt area is likely to potentially have significant effects on the environment. Consequently, a Strategic Environmental Assessment (SEA) is being carried out in tandem with the production of the Local Area Plan and an environmental report will accompany the Local Area Plan.

In accordance with the requirements of the EU Habitats Directive (92/43/EEC), the proposed Local Area Plan will also be subject to Appropriate Assessment Screening.

## **Purpose of this Report**

The purpose of this Manager's Report is to present the outcome of a pre-draft consultation programme carried out in preparation for a Draft Local Area Plan for Ballycullen - Oldcourt. This includes for feedback on a Strategic Environmental Assessment (SEA) Scoping Report that accompanied the pre-draft consultation programme.

## **Pre-Draft Consultation Programme**

The pre-draft public consultation programme for the Ballycullen-Oldcourt Local Area Plan took place over a four week period between Monday the 15<sup>th</sup> of April 2013 and Friday the 10<sup>th</sup> of May 2013 during which time information was disseminated to the public and submissions were invited as follows:

- Notification of pre-draft consultation for a local area plan for Ballycullen-Oldcourt was advertised in the *Tallaght Echo* (see Appendix 3 in separate Appendix document). The notice included invitations for submissions in relation to the pre-draft consultation and an accompanying SEA Scoping Report.
- Letters that provided further notification of the pre-draft consultation programme and an invitation for pre-draft consultation and SEA Scoping submissions were posted together with information leaflets (see Appendix 2 in separate Appendix Document) to, inter alia, the Minister for the Environment, Community and Local

Government; public sector agencies; non governmental agencies; and a variety of stakeholders including local residents' groups, local community groups and commercial and business interests within the area. This included for those that made submissions during pre-draft consultation for a proposed plan for Oldcourt in 2006. The letters and leaflets were also sent to all South Dublin County Council Elected Members.

- Circa 700 information leaflets were disseminated to all residential and commercial properties within the boundary of the proposed plan area by way of a leaflet drop.
- Information on the pre-plan consultation programme together with an invitation for submissions and a press release was placed on the South Dublin County Council website. The information displayed included the SEA Scoping Report, the pre-draft consultation information leaflet and pre-draft consultation information posters. Details were also repeatedly placed on the Council's Facebook and Twitter pages.
- Posters that provided further public consultation notification and details of public information sessions were placed in local businesses in Woodstown Shopping Centre, Scholars Shopping Centre and Old Bawn Shopping Centre. Information posters with directional signage to the venue of the public information sessions (Quaker House – Stocking Avenue) were placed along Oldcourt Avenue, Allenton Road, Oldcourt Road, Hunter's Road, Ballycullen Road, Stocking Avenue and Stocking Lane.
- Four public information sessions providing one to one consultations were attended by Council staff in Quaker House off Stocking Avenue on the following dates and times:
 

Wednesday	24 <sup>th</sup> April	4:00 pm - 7:00 pm
Thursday	25 <sup>th</sup> April	1:00 pm - 4:00 pm
Tuesday	30 <sup>th</sup> April	4:00 pm - 7:00 pm
Friday	3 <sup>rd</sup> May	1:00 pm - 4:00 pm
- Council staff were also made available to answer queries on a one to one basis at County Hall Tallaght every Wednesday afternoon during the pre-plan consultation period. Direct contact information for making additional queries during the consultation period was provided on the information leaflets distributed to members of the public and stakeholders.
- Information boards and leaflets on the pre-plan consultation programme together with the SEA scoping Report were displayed in County Hall Tallaght, County Library Tallaght and in Whitechurch Library - Ballyboden for the entire duration of the pre-plan consultation period.

### **Outcome of the Pre-Draft Consultation Programme**

The total number of people that attended the one to one public information sessions in Quaker House and public information afternoons in County Hall came to 70. The number of submissions that were received came to 55. In addition, 6 letters of acknowledgment were received from public sector agencies.

A list of all the persons/bodies that made submissions is provided below together with a reference number, which can be clicked by the Members of South Dublin County Council for the purpose of viewing full submissions online.

Person	Body Represented (if applicable)	Reference
Gillian Hughes		<a href="#">PDBallycullen0001</a>
Barbara Murphy		<a href="#">PDBallycullen0002</a>
Niall Ryan		<a href="#">PDBallycullen0003</a>
Neill Reid		<a href="#">PDBallycullen0004</a>
Barbara Murphy		<a href="#">PDBallycullen0005</a>
Sarah Carter		<a href="#">PDBallycullen0006</a>
Yvonne Glavey	Woodlawn Park Grove Association	<a href="#">PDBallycullen0007</a>
Anna Doyle		<a href="#">PDBallycullen0008</a>
Owen Shinkwin	National Transport Authority	<a href="#">PDBallycullen0009</a>
Eileen Goulden		<a href="#">PDBallycullen0010</a>
Tanya Murray	Dublin Airport Authority	<a href="#">PDBallycullen0011</a>
Martina Merren		<a href="#">PDBallycullen0012</a>
Stephen Nolan		<a href="#">PDBallycullen0013</a>
Michelle Slattery		<a href="#">PDBallycullen0014</a>
Louise Purcell		<a href="#">PDBallycullen0015</a>
Marita O'Callaghan		<a href="#">PDBallycullen0016</a>
William Scally		<a href="#">PDBallycullen0017</a>
Linda Walsh		<a href="#">PDBallycullen0018</a>
Christine Corcoran		<a href="#">PDBallycullen0019</a>
Councillor Paddy Cosgrave		<a href="#">PDBallycullen0020</a>
Robert Bray	Stocking Avenue Management Company Residents Committee	<a href="#">PDBallycullen0021</a>
Councillor Chris Bond		<a href="#">PDBallycullen0022</a>
Minister for Communications, Energy and Natural Resources Pat Rabbitte		<a href="#">PDBallycullen0023</a>
Eileen Goulden		<a href="#">PDBallycullen0024</a>
Susan Molloy	Dalriada Residents Association	<a href="#">PDBallycullen0025</a>
Siobhan Gethings		<a href="#">PDBallycullen0026</a>
Ciara Gavin		<a href="#">PDBallycullen0027</a>
Eamon Ó Deagha		<a href="#">PDBallycullen0028</a>
Alvin Price		<a href="#">PDBallycullen0029</a>
Henry O'Reilly		<a href="#">PDBallycullen0030</a>
Redmond O'Hanlon	Dodder Anglers Association	<a href="#">PDBallycullen0031</a>
Tony Manahan - Manahan Planners	Chris Jones, Clare Jones, Maeve O'Reilly, Christine Sullivan, and Marypaula Williamson.	<a href="#">PDBallycullen0032</a>
Rachel Bowden		<a href="#">PDBallycullen0033</a>
Cathryn Kendal		<a href="#">PDBallycullen0034</a>
Raymond O'Malley - Kieran O'Malley & Co. Ltd	Ballyboden Saint Enda's GAA Club	<a href="#">PDBallycullen0035</a>
Michael McCoy	D.M.C.E.G.	<a href="#">PDBallycullen0036</a>
Eamon Maloney, T.D.		<a href="#">PDBallycullen0037</a>
Tom McMahon		<a href="#">PDBallycullen0038</a>
Cian O'Mahony	Environmental Protection Agency	<a href="#">PDBallycullen0039</a>
Lesley Anne Kelly		<a href="#">PDBallycullen0040</a>
Michael Tinsley		<a href="#">PDBallycullen0041</a>
Patrick Leonard	An Taisce	<a href="#">PDBallycullen0042</a>
Noel O'Connor	Dept. of Agriculture, Food and the Marine	<a href="#">PDBallycullen0043</a>
Olivia Morgan	National Roads Authority	<a href="#">PDBallycullen0044</a>
Ian McKee		<a href="#">PDBallycullen0045</a>
Cathy Murray		<a href="#">PDBallycullen0046</a>
Tracy Armstrong - Fenton & Associates	Ladbuzz Ltd.	<a href="#">PDBallycullen0047</a>
Robert Nowlan - Ryan Nowlan Consulting	HWBC Allsop	<a href="#">PDBallycullen0048</a>
Angela O'Donoghue	Glendoher & District Residents Association	<a href="#">PDBallycullen0049</a>
Lynda Ní Cheallacháin		<a href="#">PDBallycullen0050</a>
Charles Cullen		<a href="#">PDBallycullen0051</a>
Fergal Daly		<a href="#">PDBallycullen0052</a>
Karen Needham		<a href="#">PDBallycullen0053</a>
Aine O'Riordan		<a href="#">PDBallycullen0054</a>
Audrey Molloy		<a href="#">PDBallycullen0055</a>

### Summary of Issues Raised in Submissions

All 55 of the submissions received by the Council were read and analysed. A total of 349 issues were identified and summarised in order to help inform the preparation of a Draft Local Area Plan for Ballycullen - Oldcourt.

Many of the issues raised were interrelated and therefore categorised under 23 separate category headings for the purpose of identifying the issues that were raised more frequently. Each of the category headings together with the number of times that issues were raised in relation to each heading is detailed below.

Category Heading	Number of Times Raised	% of Issues Raised
Acknowledgement of Pre-Draft Consultation	3	0.9%
Built Form and Building Heights	20	6.0%
Details of Local Area Plan	12	3.6%
Dumping and Builders Rubble	12	3.6%
Extant Planning Permissions	6	1.8%
Extent of Plan Lands	1	0.3%
Flooding, Drainage & Streams	12	3.6%
Green Infrastructure	28	8.3%
Housing Density, Tenure and Mix	12	3.6%
Land Ownership	1	0.3%
Links to Dublin Mountains	7	2.1%
Local Retail and Service Facilities	18	5.4%
Maintenance of Public Realm	4	1.2%
Parks, Open Spaces and Playgrounds	30	8.9%
Pedestrian, Bicycle Routes and Facilities	27	8.0%
Phasing	21	6.3%
Principle of Development or Development Plan Zoning	29	8.6%
Public Transport and Facilities	29	8.6%
Roads and Traffic	18	5.4%
School Provision	20	6.0%
Sports and Community Facilities	17	5.1%
Strategic Environmental Assessment	5	1.5%
Incomplete Estates	17	5.1%

In terms of the issues that were raised most frequently, the highest number (30 times/8.9% of issues raised) related to the provision of parks, open spaces and playgrounds.

The joint second highest proportion of issues raised (29 times/8.6% each) related to public transport and facilities, and the principle of development/development plan zoning objectives.

The third highest proportion of issues raised (28 times) related to green infrastructure. This included for natural heritage issues.

Other issues that featured prominently related to pedestrian and bicycle routes/facilities (27 times/8% of issues raised), phasing (21 times/6.3%), built form/building height (20 times/6%) and school provision (20 times/6%).

Full summaries of all the issues raised are organised under the aforementioned category headings in Appendix 1 of the accompanying Appendix Document. A brief overview of some of the issues that were raised most frequently is provided in the section below.

## **Overview of Issues Raised**

### *Parks, Open Spaces and Playgrounds*

Many of the issues raised under this topic heading were concerned with the lack of provision of parks, open spaces and playgrounds in the area. A number of submissions suggested the creation of a large parkland stretching across the plan lands, while quite a number suggested linking the area with the Dublin Mountains and in particular with the Hell Fire Club. A few issues raised requested the reservation of existing open space (agricultural lands) for both parkland and community facilities. The completion of parks/open spaces, which are a requirement of extant planning permissions, featured strongly as well as a request to locate open space near each estate. The provision of allotments and composting facilities for apartment dwellers was suggested.

### *Green Infrastructure*

The creation of a green buffer between any future development and the Dublin Mountains featured strongly amongst the issues raised. There were many suggestions to what this buffer should consist of, such as: the use of existing hedgerows, waterways, the rural setting, existing wildlife and the preservation of historic features found in the area. There were numerous requests to preserve the natural environment as much as possible. The watercourses that traverse the proposed plan lands were seen as an asset. Tree planting and the protection of views were also suggested.

Flooding and drainage was a huge concern for quite a number of people and their concerns related to previous flooding events, the potential for new development to exacerbate this and the impacts of climate change. There were requests that adequate sewerage and drainage systems be put in place to accommodate future development.

### *Built Form & Building Heights*

Quite a number of issues raised related to building heights, the need to blend buildings into the mountain landscape and the need to restrict heights in this sensitive area to no more than 2/3 stories; one person noted the negative impact of wind on high buildings at this location thus making balconies unusable. A number of people raised concerns about the proliferation of apartments and duplex type dwellings in the area and requested that any future residential development should take the form of low density and low rise dwelling houses. A landowner recommended that there should not be a prescriptive requirement to have only single storey dwelling houses.

The segregation of communities/estates, by the erection of walls and railings and the building of 'gated-communities', was objected to by a number of people, with the request that these barriers be removed to allow full accessibility.

A small number of people requested that buildings be constructed in accordance with Green Energy principles to include the incorporation of solar panels and rain water collection tanks. Other general issues raised included the under-grounding of electricity lines.

### *Public Transport and Facilities*

The main issues raised under this heading, related to the improvement of bus services such as shelters, timetables, access to and from bus stops and the relocation of bus stops closer to estate entrances. The provision of a purpose built terminus was a popular issue, with a number of people requesting that toilets be provided for bus drivers. There is a general acknowledgement that public

transportation is a necessity in the area and should be provided for within the local area plan. Links to other areas, not just eastward into the City Centre, including links to the Luas at Tallaght and Dundrum were suggested.

#### *Principle of Development – Development Plan Zoning*

A significant number of people, at least 18 of the 55 people who made submissions, requested that the zoning of the land be reviewed and most of the 18 submitters requested that the residential (A1) zoned lands be rezoned to 'greenbelt' or 'agriculture' use. Some requested that lands above the 100 metre/110 metre contour be rezoned from residential use to agricultural/parkland use. A resident raised the issue that parts of the proposed plan lands that are zoned for residential development breach the 120 metre contour.

A landowner requested that additional lands be zoned for residential (A1) purposes – these lands are located above the 120m contour. A second landowner requested that the County Development Plan school designation be removed from their site.

#### *Phasing, Incomplete development, Retail and Community Uses,*

The vast majority of issues raised under these topics stated that no further development should take place until unfinished developments are completed and all community facilities are in place. Others suggested that further development should only take place in tandem with the provision of community and retail facilities. The need for additional school places in the area was also raised.

A number of people requested that a central or focal point be included within the Plan Lands, which would be designed around the 'street' rather than based on the design of existing commercial centres that are difficult to access.

Two landowners put forward arguments why they should be allowed to be the first to develop their respective sites and both requested that their lands be included in the first phasing of development.

#### *Other Issues Raised by Landowners*

Three landowners made submissions relating to various large parcels of land located across the proposed plan lands. These submissions made specific requests regarding the development potential of each of their individual sites. One landowner's agent ([PDBallycullen0032](#)) requested that the County Development Plan school designation be removed from their site.

Another landowner's agent ([PDBallycullen0047](#)) acknowledged that ESB power lines and a Dublin City watermain that traverses their client's lands, together with their respective way leaves, creates an impediment to development but also stated that the lands were 'well placed to cater for the delivery of housing in the future, given their location and topography'. It was also stated that the delivery of housing should take precedence over Green Infrastructure and links and requested that 'primary areas' should not be identified for major infrastructure or open spaces. Furthermore, it was requested that SLO87(c) of the County Development Plan be amended so that open space would be centrally located, within the Plan Lands, rather than to the east of the proposed access road, on lands currently in their ownership. It was also requested that building heights should not be prescribed particularly in close proximity to Oldcourt Cottages.

The third landowner's agent ([PDBallycullen0048](#)) requested that the route of a road indicated under the County Development Plan's Long Term Roads Objective be realigned to correspond with the route of a watermain that traverses their client's site.

It was stated that the road envisaged under the Long Term Roads Objective does not relate to the movement of existing traffic but relates to unlocking/opening up of the Oldcourt Lands for development and will provide a means of access to the M50 to the east and Tallaght to the west.

#### **Next Steps in Local Area Plan Making Process**

The next steps in the Local Area Plan making process will encompass the detailed and comprehensive preparation of a Draft Local Area Plan for Ballycullen – Oldcourt. When published, the Draft Local Area Plan will be subject to a further public consultation programme that is prescribed under Planning and Development Legislation.

This report will play a significant role in guiding the preparation of the Draft Local Area Plan.