



SOUTH DUBLIN COUNTY COUNCIL DRAFT DEVELOPMENT PLAN 2016-2022

CHIEF EXECUTIVE'S REPORT ON DRAFT PLAN PUBLIC CONSULTATION

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0.1.0 INTRODUCTION

Pursuant to Section 12 of the Planning and Development Act 2000 (as amended), notice of the preparation of the South Dublin County Council Draft Development Plan 2016-2022 was given on Monday 13th July 2015 (see Appendix A – Newspaper Notice). Submissions or observations with regard to the Draft Plan and Environmental Reports (Strategic Environmental Assessment and Appropriate Assessment) were invited for a period of just over 10 weeks from Monday 13th July 2015 up to 5.00 pm (in writing) on Thursday 24th September 2015 (12:00 midnight for online submissions) inclusive. The notices included details of the display of the Draft Plan together with the dates and times of public information sessions and the availability of Council staff for further consultation.

In accordance with the requirements of Section 12(4)(b) of the Planning and Development Act 2000 (as amended), this Chief Executive's Report summarises and details the outcome of the public consultation programme on the Draft County Development Plan and provides recommendations as follows:

- Lists the persons or bodies who made submissions or observations on the Draft Plan;
- Summarises the issues raised under the submissions or observations received during the consultation period from all persons and bodies. This includes the issues raised and recommendations made by the Minister for the Environment, Community and Local Government, the National Transport Authority and the Eastern and Midland Regional Assembly;
- Gives the response of the Chief Executive to the issues raised and recommendations made, taking account of:
 - any directions of the members of the authority regarding the preparation of the Draft Development Plan,
 - the proper planning and sustainable development of the area,
 - the statutory obligations of the local authority and any relevant policies or objectives of the Government or of any Minister of the Government,
 - and any observations made by the Minister for Arts, Heritage, Gaeltacht and the Islands relating to any addition to or deletion from the Record of Protected Structures.

This Chief Executive's Report on the Draft Plan Consultation is hereby submitted to the members of the Planning Authority for consideration. The elected members have up to 12 weeks to consider this Chief Executive's Report (plus 9 extra days to account for the Christmas period). Members will be briefed in relation to the review in January 2016 and Special Meetings of South Dublin County Council will take place in February/March 2016.

0.1.1 Strategic Environmental Assessment (SEA)

A Draft Environmental Report accompanies the Draft County Development Plan 2016-2022. The Draft Environmental Report contains a detailed analysis of the Draft County Development Plan 2016-2022 and how the implementation of the Plan would impact on its receiving environment. The Chief Executive's recommendations as set out in this report (including recommendations on the Environmental Authorities submissions detailed in Appendix A) have been assessed to determine whether they would have any significant impact on the environment. Taking into account the mitigation measures which have already been integrated into the Draft Plan, it was considered that the amendments proposed on foot of recommendations in this Chief Executive's Report would not have any significant adverse effect on the environment. Any proposed material amendments will subsequently also be screened for the need to undertake SEA. The findings of this screening exercise together with, if required, a full SEA will accompany any proposed material that go on public display following consideration of the Draft Plan and this Chief Executive's Report.

0.1.2 Appropriate Assessment (AA)

In accordance with requirements under EU Habitats Directive (92/43/EEC) and Section 177 of the Planning and Development Act 2000 (as amended), amendments proposed on foot of this Chief Executive's Report have been screened to assess whether they would have a significant effect on one or more Natura 2000 sites. It was considered that the amendments proposed on foot of the recommendations, alone and in combination with other plans and projects including the Draft Plan, would not have any significant effect on any Natura 2000 sites.

0.2.0 OVERVIEW OF CONSULTATION

Having undertaken Pre-Draft Public Consultation between September and October 2014, consultation on the South Dublin County Council Draft Development Plan 2016-2022 marked Stage 2 in the review of the County Development Plan. The key actions in the review process including those undertaken under Stages 1 and 2 (shown in faded grey text) are summarised in Figure 1 below.

Fig. 1 – Summary of Review Process

STAGE 1: PRE-DRAFT (Complete)
NOTICE OF REVIEW
STAKEHOLDER & PUBLIC CONSULTATION
CHIEF EXECUTIVE'S REPORT ON CONSULTATION SUBMITTED TO MEMBERS
MEMBERS CONSIDER REPORT & GIVE DIRECTIONS REGARDING PREPARATION OF THE DRAFT PLAN
CHIEF EXECUTIVE PREPARES DRAFT PLAN AND SUBMITS TO MEMBERS FOR CONSIDERATION
MEMBERS CONSIDER DRAFT PLAN AND CAN ACCEPT OR AMEND
STAGE 2: DRAFT (Current Stage)
NOTICE OF DRAFT PLAN
CONSULTATION ON DRAFT PLAN
CHIEF EXECUTIVE'S REPORT ON SUBMISSIONS/OBSERVATIONS SUBMITTED TO MEMBERS
MEMBERS CONSIDER REPORT & DRAFT PLAN AND CAN AMEND
STAGE 3: MATERIAL ALTERATIONS (Next Stage, if changes are material)
NOTICE OF PROPOSED MATERIAL ALTERATIONS
CONSULTATION ON PROPOSED MATERIAL AMENDMENTS
CHIEF EXECUTIVE'S REPORT ON SUBMISSIONS/OBSERVATIONS SUBMITTED TO MEMBERS
MEMBERS CONSIDER REPORT & PROPOSED AMENDMENTS AND CAN ACCEPT OR MODIFY
PLAN ADOPTED

0.2.1 Consultation on Draft Development Plan

Consultation on the South Dublin County Council Draft Development Plan 2016-2022 was undertaken for a period of just over 10 weeks from 13th July 2015 to 24th September 2015 inclusive. The key elements of the consultation programme are set out below:

- South Dublin County Council Mayor Sarah Holland formally launched the South Dublin County Council Draft Development Plan 2016-2022 and the public consultation programme on Monday 13th July 2015 at County Hall, Tallaght. Invitations to the launch were issued to the Elected Members of South Dublin County Council, the extended Management Team and the press.
- Notification of the intention to review the County Development Plan was issued to prescribed bodies together with those that made submissions at pre-draft stage on Monday 13th July 2015.
- A press release was issued to local and national newspapers and notice of the publication of the Draft County Development Plan was published in the *Irish Times* on Monday 13th July 2015 and in the *Tallaght Echo* on Thursday 16th July 2015 (see Appendix B). The notices included information on how to make a submission and information on the display of the Draft Plan together with the dates and times of public information sessions.
- Public displays were placed at County Hall Tallaght, Civic Offices Clondalkin and at all County libraries for the duration of the public consultation programme. Displays included the Draft Development Plan Written Statement, Maps, Environmental Reports and all other accompanying documents including leaflets on how to make a submission.
- A dedicated website www.southdublindevplan.ie was created to host information on the entire County Development Plan Review process from start to finish. The

website included details on the Stage 2 Consultation Programme including details of public consultation sessions and details on how to make a submission. The Draft Development Plan Written Statement, Maps, Environmental Reports and all accompanying documents were uploaded onto the website. A News Items page provided regular updates on progress of the Stage 2 Public Consultation Programme. The website received approximately 6,000 hits during the Draft Plan Consultation Programme.

- An online submission system was created to accept submissions during the prescribed consultation period. The online submissions system was hosted on the website [www.southdublindevplan.ie](http://www.southdublinddevplan.ie) and allowed people to make submissions under a range of headings/topics. A postal address was also provided for hard copy and written submissions.
- Council staff hosted a total of 12 public information sessions between August and September 2015 at venues located throughout the County including Ballyroan Library, Clondalkin Civic Offices, Clondalkin Library, Tallaght Library, Palmerstown Community Centre, Rathcoole Community Centre, Saint Finian's Community Centre (Newcastle), Lucan Library and Perrystown Community Centre (see Appendix C photographs). A total of 175 people attended these sessions.
- Council staff were made available every Wednesday afternoon to answer queries from members of the public during the entire public consultation period. A total of 30 people made use of this facility. Numerous additional queries were made at the public counter in County Hall, by e-mail and by phone.
- Two videos were produced to promote the County and the County Development Plan Review. These videos encouraged members of the public to think about their County, to review the Draft County Development Plan and to make a submission. The videos are hosted on the County Development Plan Website and on YouTube.
- A social media add campaign providing a link to the www.southdublindevplan.ie website and the promotional videos were directed to people within the County that have a social media account. The advert reached approximately 25,000 people within the County. Approximately 4,000 people subsequently watched one of the promotional County Development Plan Review videos.

0.3.0 CONSULTATION OUTCOME

A total of 510 submissions and observations were received during the prescribed public consultation period. An additional 7 submissions and observations were received after the specified deadline.

A list of all the persons/bodies that made submissions or observations on the Draft Plan during the prescribed consultation period is provided in Table 1 below together with individual reference numbers that can be clicked as a link to scanned or uploaded copies of each submission. For data protection reasons, the links can only be accessed by staff and Elected Members of South Dublin County Council via MembersNet.

Full summaries of the issues raised in the submissions are provided further below in Section 0.5 of this report.

Table 1: List of Persons/Bodies that Made Submissions

Person	Company (if applicable)	Body/Person(s) Represented (if applicable)	Ref
Paul Corcoran			DRAFTDEVPLAN0001
Paul Corcoran			DRAFTDEVPLAN0002
Paul Corcoran			DRAFTDEVPLAN0003
Conor Sweeney			DRAFTDEVPLAN0004
Paul Corcoran	DIT	Paul Corcoran	DRAFTDEVPLAN0005
Niamh Kinsella			DRAFTDEVPLAN0006
Aishling Tobin			DRAFTDEVPLAN0007
BRENDAN LYNCH			DRAFTDEVPLAN0008
Pol O Meadhra	Gaelphobal Thamhlachta	Gaelphobal Thamhlachta	DRAFTDEVPLAN0009
Jeanine Nolan			DRAFTDEVPLAN0010
Paul Corcoran			DRAFTDEVPLAN0011
Gary Tyrrell			DRAFTDEVPLAN0012
Malachy Magorrian			DRAFTDEVPLAN0013
Malachy Magorrian			DRAFTDEVPLAN0014
Donna Riordan			DRAFTDEVPLAN0015
James Harper		James Harper	DRAFTDEVPLAN0016
James Harper		James Harper	DRAFTDEVPLAN0017
Noeleen Fulham			DRAFTDEVPLAN0018
James Harper		James Harper	DRAFTDEVPLAN0019
James Harper		James Harper	DRAFTDEVPLAN0020
James Harper		James Harper	DRAFTDEVPLAN0021
James Harper		James Harper	DRAFTDEVPLAN0022
Fergal Daly			DRAFTDEVPLAN0023
Gary Tyrrell			DRAFTDEVPLAN0024
Gary Tyrrell			DRAFTDEVPLAN0025
Gary Tyrrell		Gary Tyrrell	DRAFTDEVPLAN0026
Gary Tyrrell			DRAFTDEVPLAN0027
Josie Flanagan	St. Marks Silver Surfers Active Retirement Group		DRAFTDEVPLAN0028
Jacinta Cuthbert			DRAFTDEVPLAN0029
Jacinta Cuthbert			DRAFTDEVPLAN0030
Tony Cuthbert			DRAFTDEVPLAN0031
Deirdre Kelly			DRAFTDEVPLAN0032
Mark Barrett			DRAFTDEVPLAN0033
Gerard Kavanagh			DRAFTDEVPLAN0034
Andrew O'Meara			DRAFTDEVPLAN0035

Person	Company (if applicable)	Body/Person(s) Represented (if applicable)	Ref
Cathy Mc Dermott			DRAFTDEVPLAN0036
Will Byrne	Lucan Harrier & Athletic Club		DRAFTDEVPLAN0037
Claire Groarke			DRAFTDEVPLAN0038
Maeve McMahon			DRAFTDEVPLAN0039
Fergus Corrigan			DRAFTDEVPLAN0040
Maureen Ferry			DRAFTDEVPLAN0041
Maureen Ferry			DRAFTDEVPLAN0042
Lorraine Hennessey	Balgaddy Working Together Group		DRAFTDEVPLAN0043
Niall Dowling			DRAFTDEVPLAN0044
Maeve McMahon			DRAFTDEVPLAN0045
Louise Purcell			DRAFTDEVPLAN0046
Marion Phillips			DRAFTDEVPLAN0047
Alicja Cichocka			DRAFTDEVPLAN0048
Jong Kim	Masterplan Associates	Ada Murphy	DRAFTDEVPLAN0049
Jong Kim	AKM Consultants	Liam Mulvaney	DRAFTDEVPLAN0050
Fergus Walsh	St Annes GAA Club		DRAFTDEVPLAN0051
David Galvin	Environmental Protection Agency		DRAFTDEVPLAN0052
Ms Noeleen Slattery			DRAFTDEVPLAN0053
Eoin Dundon			DRAFTDEVPLAN0054
Karl & Mary Kelly			DRAFTDEVPLAN0055
Kathy & Tom McCarthy			DRAFTDEVPLAN0056
Paul Cleary			DRAFTDEVPLAN0057
Edward Finn			DRAFTDEVPLAN0058
Patrick Farrell			DRAFTDEVPLAN0059
Tara Spain	Transport Infrastructure Ireland (TII)		DRAFTDEVPLAN0060
Annette O'Neill			DRAFTDEVPLAN0061
Patricia Houston			DRAFTDEVPLAN0062
Nathalie Dowling	Lucan Autism Network		DRAFTDEVPLAN0063
Nicola Whelan	Lucan Autism Network		DRAFTDEVPLAN0064
Terry Gahan			DRAFTDEVPLAN0065
Nathalie Dowling	Lucan Autism Network		DRAFTDEVPLAN0066
Hugh Lynn	Citywest Limited		DRAFTDEVPLAN0067
William Donoghue	William Donoghue & Associates Ltd	Tom Corcoran	DRAFTDEVPLAN0068
Colm O'Brien			DRAFTDEVPLAN0069
Jim Copeland		Jim Copeland	DRAFTDEVPLAN0070
Michele Uí Bhuachalla			DRAFTDEVPLAN0071
Nora Bermingham			DRAFTDEVPLAN0072
William Donoghue	William Donoghue & Associates	Kilmore Ventures Ltd.	DRAFTDEVPLAN0073
Paul Corcoran			DRAFTDEVPLAN0074
Martin Cunningham			DRAFTDEVPLAN0075
Richard Butler	Cunnane Stratton Reynolds	Edward and Joan Fox	DRAFTDEVPLAN0076
Paul Corcoran	Rebuild the Silver Bridge		DRAFTDEVPLAN0077
Cllr Colm Brophy			DRAFTDEVPLAN0078
John Pope	PAMES Asset Management Limited	Burris Property Company (in receivership), Everglade Properties (in receivership), Dietacaron, Kelland Homes	DRAFTDEVPLAN0079
Leo Maher			DRAFTDEVPLAN0080

Person	Company (if applicable)	Body/Person(s) Represented (if applicable)	Ref
Declan Brassil	Declan Brassil & Co.	Harris Group of Naas Road	DRAFTDEVPLAN0081
Declan Brassil	Declan Brassil & Co.	Harris Group	DRAFTDEVPLAN0082
Declan Brassil	Declan Brassil & Co.	The Blenders, Newmarket Square	DRAFTDEVPLAN0083
Peter Keogh		Lucan Pitch & Putt Club	DRAFTDEVPLAN0084
Thomas O'Neill			DRAFTDEVPLAN0085
Yvonne Smith	Cherith Therapy Centre (Not for profit organisation)		DRAFTDEVPLAN0086
Angela Wall			DRAFTDEVPLAN0087
Ian Whyte			DRAFTDEVPLAN0088
Matthew McRedmond	Brock McClure Consultants		DRAFTDEVPLAN0089
Robert Nowlan	Ryan Nowlan Consulting	Bagnall Doyle McMahon Chartered Surveyors	DRAFTDEVPLAN0090
Alan Whelan	O'Connor Whelan	Aldi Stores (Ireland) Limited	DRAFTDEVPLAN0091
Robert Nowlan	Ryan Nowlan Consulting	Bagnall Family c/o Bagnall Doyle McMahon	DRAFTDEVPLAN0092
Sarah Doolan			DRAFTDEVPLAN0093
Shane O'Brien			DRAFTDEVPLAN0094
Marina Reynolds			DRAFTDEVPLAN0095
Paul Flynn			DRAFTDEVPLAN0096
Martin & Mary Behan			DRAFTDEVPLAN0097
Erika Casey	John Spain Associates	MLEU Dublin Limited and Mr. Charles Verschoyle Greene	DRAFTDEVPLAN0098
Con McCarthy	Sandymark Investments Plc	Sandymark Investments Plc	DRAFTDEVPLAN0099
Chay Bowes	Hell Fire leisure		DRAFTDEVPLAN0100
Con McCarthy	Greenogue Management No2 Ltd		DRAFTDEVPLAN0101
Con McCarthy	Greenogue Management No2 Ltd		DRAFTDEVPLAN0102
Con McCarthy	Greenogue Management No2 Ltd		DRAFTDEVPLAN0103
Warren Whitney			DRAFTDEVPLAN0104
Eoin McDonnell	Fáilte Ireland		DRAFTDEVPLAN0105
Olwyn James	Irish Water		DRAFTDEVPLAN0106
Sarah Holland	Mayor	Cherith Centre	DRAFTDEVPLAN0107
Tony Manahan	Manahan Planners		DRAFTDEVPLAN0108
Niall Melvin	Core Retail Holdings Limited		DRAFTDEVPLAN0109
Tony Manahan	Manahan Planners	Jones Investments Ltd	DRAFTDEVPLAN0110
John Gannon	Tom Phillips + Associates	Fergal O'Gara	DRAFTDEVPLAN0111
Ian McGrandles	IMG Planning Limited	Javana Limited (in Receivership) c/o Duff & Phelps (Ireland) Limited	DRAFTDEVPLAN0112
Suzanne McClure	Brock McClure Consultants	Cavvies' Ltd	DRAFTDEVPLAN0113
Mr. Jamie Rohan (c/o Stephen M. Purcell, Future Analytics Consulting Ltd.) Rohan Holdings Ltd. (c/o Future Analytics Consulting Ltd.)	Rohan Holdings Ltd. (c/o Future Analytics Consulting Ltd.)	Rohan Holdings Ltd	DRAFTDEVPLAN0114
Suzanne McClure	Brock McClure Consultants	Vinjac Ltd.	DRAFTDEVPLAN0115
Julie Mulleady	JCDecaux Ireland Ltd		DRAFTDEVPLAN0116
Suzanne McClure	Brock McClure Consultants	Arcourt Ltd.	DRAFTDEVPLAN0117
Christopher McGarry	National Asset Management Agency		DRAFTDEVPLAN0118
Hugh Lynn	Citywest Limited		DRAFTDEVPLAN0119
John Sheehan	Tom Phillip + Associates	The Irish Rugby Football Union (IRFU)	DRAFTDEVPLAN0120

Person	Company (if applicable)	Body/Person(s) Represented (if applicable)	Ref
Scott Greenwood	Lucan Scouts - 180th		DRAFTDEVPLAN0121
John Murphy	BMA Planning	Burris Property Company (In Receivership)	DRAFTDEVPLAN0122
Paul & Geraldine Ferrick			DRAFTDEVPLAN0123
John Murphy	BMA Planning	Intrust Properties Limited	DRAFTDEVPLAN0124
John Murphy	BMA Planning	T. Boylan	DRAFTDEVPLAN0125
John Murphy	BMA Planning	Airscape Limited	DRAFTDEVPLAN0126
Damien Byrne			DRAFTDEVPLAN0127
Denis Twohig		Westbury Court Residents Association	DRAFTDEVPLAN0128
Noel Doherty			DRAFTDEVPLAN0129
Peter Corby		Griffen Glen Residents Association	DRAFTDEVPLAN0130
Helen Farrell	Supporters of #Pool4Lucan		DRAFTDEVPLAN0131
Helen Farrell			DRAFTDEVPLAN0132
Fiona Farrell			DRAFTDEVPLAN0133
William Cullen Cullen			DRAFTDEVPLAN0134
Helen Farrell			DRAFTDEVPLAN0135
Emmet Hegarty			DRAFTDEVPLAN0136
Matthew Parkes			DRAFTDEVPLAN0137
Janis Morrissey			DRAFTDEVPLAN0138
Adrian Short	142nd Esker and 180th Lucan South Scouts		DRAFTDEVPLAN0139
Des Cathcart			DRAFTDEVPLAN0140
David Fitzgerald			DRAFTDEVPLAN0141
Triona Cathcart			DRAFTDEVPLAN0142
Elaine Fitzgerald			DRAFTDEVPLAN0143
Kevin O'Loughlin			DRAFTDEVPLAN0144
Joe Harrington			DRAFTDEVPLAN0145
Robert Meehan			DRAFTDEVPLAN0146
Joseph Corr	Corr & Associates		DRAFTDEVPLAN0147
Hendrik van der Kamp	Hendrik W van der Kamp, Town Planner	Concerned Residents of Firhouse, c/o Paul Crossan	DRAFTDEVPLAN0148
Martin Finegan	142nd Esker and 180th Lucan South Scouts		DRAFTDEVPLAN0149
Colm Cummins	Electricity Supply Board (ESB)		DRAFTDEVPLAN0150
Aoife Byrne	SLR Consulting	Roadstone Limited	DRAFTDEVPLAN0151
Shay Conway		Shay Conway	DRAFTDEVPLAN0152
Shay Conway		Shay Conway	DRAFTDEVPLAN0153
Shay Conway		Shay Conway	DRAFTDEVPLAN0154
Beverley Power	Old Orchard Management Company		DRAFTDEVPLAN0155
Clare Connolly	Department of Education & Skills		DRAFTDEVPLAN0156
Bernard Byrne	Dublin City Public Libraries.		DRAFTDEVPLAN0157
Brian Smith	142nd Dublin (Esker) Scout Group		DRAFTDEVPLAN0158
Con McCarthy	Greenogue Management No 2 Ltd		DRAFTDEVPLAN0159
Shay Conway		Shay Conway	DRAFTDEVPLAN0160
Eleanor Mac Partlin	Stephen Little & Associates	Killeen Motor Group	DRAFTDEVPLAN0161
Suzanne McClure	Brock McClure Consultants	Ecotec Construction Ltd	DRAFTDEVPLAN0162
Suzanne McClure	Brock McClure Consultants	Ben Partnership	DRAFTDEVPLAN0163

Person	Company (if applicable)	Body/Person(s) Represented (if applicable)	Ref
Marion Sweetman	Lansdowne Park & District Residents' Association		DRAFTDEVPLAN0164
Catherine Madden	Department of Defence		DRAFTDEVPLAN0165
John M Morris	John Martin Morris B Arch MRIAI	Joe & Patricia Boyle	DRAFTDEVPLAN0166
Rob Goodbody	Historic Building Consultants	Rathfarnham Meeting of the Religious Society of Friends in Ireland	DRAFTDEVPLAN0167
John Fingleton	Fingleton White	Fingleton White	DRAFTDEVPLAN0168
Thomas Mc Dermott	South Dublin Co. Sports Partnership		DRAFTDEVPLAN0169
Neville Graver	Rathcoole Community Council Limited		DRAFTDEVPLAN0170
Rob Goodbody	Historic Building Consultants	Owners of the Merry Ploughboy, Edmondstown Road	DRAFTDEVPLAN0171
Stephen Campbell	Citywest Ltd		DRAFTDEVPLAN0172
David Slattery	David Slattery Conservation Architects Limited	Ursula & Natasha Kenny	DRAFTDEVPLAN0173
Cllr Jonathan Graham		Cllr Jonathan Graham	DRAFTDEVPLAN0174
Shane Cronin	PD Adventure Sports Limited		DRAFTDEVPLAN0175
Benny Cullen	Canoeing Ireland		DRAFTDEVPLAN0176
Lorraine Kelly	180th Lucan South Scout Group		DRAFTDEVPLAN0177
Dublin South West Green Party			DRAFTDEVPLAN0178
Pauline Byrne	Brady Shipman Martin	Tudor Homes	DRAFTDEVPLAN0179
Eugene Barrett	Knocklyon Network Ltd.		DRAFTDEVPLAN0180
John Murphy	BMA Planning	Wilsons Auctions	DRAFTDEVPLAN0181
John Mooney William Stapleton, Linda Harte, Paul Lynam	Weirview Residents Association	Weirview Residents Association	DRAFTDEVPLAN0182
Minister for Environment, Community & Local Government	Department of the Environment, Community & Local Government		DRAFTDEVPLAN0183
Vivienne Boylan	BMA Planning and Development Consultants	Dublin Postal Sports and Social Club	DRAFTDEVPLAN0184
John Spain Associates	John Spain Associates	Tierra Ltd.	DRAFTDEVPLAN0185
Anne Moloney			DRAFTDEVPLAN0186
Alan Whelan	O'Connor Whelan	Hermitage Medical Clinic	DRAFTDEVPLAN0187
Robert McLoughlin	Bilfinger GVA	Hines Real Estate Ireland Ltd	DRAFTDEVPLAN0188
John Tierney	John Spain Associates	Carmelite Sisters	DRAFTDEVPLAN0189
Fintan Morrin	The Planning Partnership	Lidl Ireland GmbH	DRAFTDEVPLAN0190
Paul O'Neill	Bilfinger GVA	Yum Restaurants International Ltd.	DRAFTDEVPLAN0191
Olan Crowley	Architects Workshop Limited	Declan Brennan	DRAFTDEVPLAN0192
John Tierney	John Spain Associates	M J Devitt	DRAFTDEVPLAN0193
Frances Fitzgerald	Minister for Justice and Equality		DRAFTDEVPLAN0194
Brian Maher	Bilfinger GVA	P.K.B. Partnership	DRAFTDEVPLAN0195
Sarah Gatley	Geological Survey of Ireland (Dept. Communications, Energy & Natural Resources)		DRAFTDEVPLAN0196
Stephen Little	Stephen Little & Associates	Castlethorn Construction	DRAFTDEVPLAN0197
David Mulcahy	David Mulcahy Planning Consultants Ltd	Petrogas Group PLC	DRAFTDEVPLAN0198
John O'Malley	Kieran O'Malley & Co. Ltd.	John & Phil Kelly	DRAFTDEVPLAN0199

Person	Company (if applicable)	Body/Person(s) Represented (if applicable)	Ref
Robert Keran	John Spain Associates	Peamount Healthcare	DRAFTDEVPLAN0200
Robert Keran	John Spain Associates	Hibernia REIT Plc	DRAFTDEVPLAN0201
Ian McLean			DRAFTDEVPLAN0202
Eoin O Cofaigh	McHugh O Cofaigh Architects	David Kennedy	DRAFTDEVPLAN0203
John McGivney		Finnstown Abbey / Priory / Cloisters Residents Associations	DRAFTDEVPLAN0204
Paul O'Connell M.R.I.A.I.	Paul O'Connell & Associates	Daniel Kennedy	DRAFTDEVPLAN0205
Muirenn Duffy	Bilfinger GVA	Tesco Ireland Ltd.	DRAFTDEVPLAN0206
Joe Bonner	Joe Bonner Planning	Glen and Sarah Walker	DRAFTDEVPLAN0207
John Tierney	John Spain Associates	Dublin City Services Sports & Social Club	DRAFTDEVPLAN0208
Tadhg MacNamara	National Transport Authority		DRAFTDEVPLAN0209
Pádraig MacOitir	South Dublin Conservation Society		DRAFTDEVPLAN0210
Vincent Gallagher			DRAFTDEVPLAN0211
Doireann Ni Cheallaigh	An Taisce		DRAFTDEVPLAN0212
Éamonn Maloney TD			DRAFTDEVPLAN0213
Tony McGrath	PM Group	Google Ireland Ltd	DRAFTDEVPLAN0214
John Murphy	BMA Planning	Lidl Ireland GmbH	DRAFTDEVPLAN0215
Clr Paula Donovan			DRAFTDEVPLAN0216
Eoin Ó Murchú	Na Gaeil Óga CLG		DRAFTDEVPLAN0217
Eoin Ó Murchú	Na Gaeil Óga CLG		DRAFTDEVPLAN0218
Eoin Ó Murchú	Na Gaeil Óga CLG		DRAFTDEVPLAN0219
Paul Hand			DRAFTDEVPLAN0220
Ciara Slattery	New Generation Homes		DRAFTDEVPLAN0221
Mairead Forsythe	Dublin Cycling Campaign		DRAFTDEVPLAN0222
Maria Jose & Patrick Diez	N/A		DRAFTDEVPLAN0223
Nuala Canavan			DRAFTDEVPLAN0224
Joanna Tuffy	TD - Constituency of Dublin Mid-West		DRAFTDEVPLAN0225
Joanne Gilson			DRAFTDEVPLAN0226
Frank Canavan			DRAFTDEVPLAN0227
Joanne Gilson			DRAFTDEVPLAN0228
Joanne Gilson			DRAFTDEVPLAN0229
Joanne Gilson			DRAFTDEVPLAN0230
Joanne Gilson			DRAFTDEVPLAN0231
Joanne Gilson			DRAFTDEVPLAN0232
Joanne Gilson			DRAFTDEVPLAN0233
Weston Aviation Academy Ltd. c/o Stephen M. Purcell, Future Analytics Consulting Ltd.	Weston Aviation Academy Ltd (c/o Future Analytics Consulting Ltd.)	Weston Aviation Academy Ltd	DRAFTDEVPLAN0234
Sandra Lee		Canonbrook Residents Association	DRAFTDEVPLAN0235
John Bielenberg			DRAFTDEVPLAN0236
William Brehon	Combined action on weston airport ltd		DRAFTDEVPLAN0237
Joanna Tuffy			DRAFTDEVPLAN0238
Joanna Tuffy TD			DRAFTDEVPLAN0239
Joanna Tuffy TD			DRAFTDEVPLAN0240
Joanna Tuffy TD			DRAFTDEVPLAN0241

Person	Company (if applicable)	Body/Person(s) Represented (if applicable)	Ref
Paul O'Connell	Paul O'Connell & Associates		DRAFTDEVPLAN0242
Stephen & Breda Cass			DRAFTDEVPLAN0243
Sean Treanor			DRAFTDEVPLAN0244
Mark Byrne	Prospect Manor Residents Association		DRAFTDEVPLAN0245
Joe Bonner	Joe Bonner Planning	Lee Cullen & Richard Mockler in receivership	DRAFTDEVPLAN0246
Hendrik van der Kamp	Hendrik W van der Kamp, Town Planner	Concerned Residents in Firhouse area	DRAFTDEVPLAN0247
Joe Byrne	Liffey Valley Park Alliance		DRAFTDEVPLAN0248
Joe Bonner	Joe Bonner Planning	Annod Ltd.	DRAFTDEVPLAN0249
Joe Bonner	Joe Bonner Planning	Annod Ltd	DRAFTDEVPLAN0250
Joe Bonner	Joe Bonner Planning	Annod Ltd	DRAFTDEVPLAN0251
Joe Bonner	Joe Bonner Planning	Annod Ltd	DRAFTDEVPLAN0252
Lorraine Hennessy		The Workers' Party	DRAFTDEVPLAN0253
Mary Gaffney			DRAFTDEVPLAN0254
Yvonne Glavey			DRAFTDEVPLAN0255
Mairead Flanagan			DRAFTDEVPLAN0256
Sandra Keogh			DRAFTDEVPLAN0257
Donal Duffy	Downey Planning	Drumargh Ltd	DRAFTDEVPLAN0258
Olag Sivanantham	Adamstown Cricket Club		DRAFTDEVPLAN0259
Maura Gaffney			DRAFTDEVPLAN0260
Gerard Stockil		Tallaght Community Council	DRAFTDEVPLAN0261
Cormac Dooley	Dooley Architects	Search 4 alpha CVBA	DRAFTDEVPLAN0262
Graham Owens	Glenlyon Residents Association		DRAFTDEVPLAN0263
Joe Bonner	Joe Bonner Planning	J. Harris Assemblers	DRAFTDEVPLAN0264
Cormac Dooley	Dooley Architects		DRAFTDEVPLAN0265
Jeff Colley	Temple Media Ltd, trading as Passive House Plus (Eco Build & Upgrade)		DRAFTDEVPLAN0266
Patrick Joyce	Prospect Manor Residents Association		DRAFTDEVPLAN0267
Doireann NiCheallaigh	An Taisce		DRAFTDEVPLAN0268
Jeff Colley	Temple Media Ltd, trading as Passive House Plus (Eco Build & Upgrade)		DRAFTDEVPLAN0269
Colm Brennan			DRAFTDEVPLAN0270
Colm Brennan			DRAFTDEVPLAN0271
Tina & Mark Walsh			DRAFTDEVPLAN0272
Anne-Marie Dermody	Councillor/Solicitor		DRAFTDEVPLAN0273
Lorraine Hennessy	Balgaddy Working Together Group		DRAFTDEVPLAN0274
John F. O'Connor	JFOC Design & Planning	Henry & Ted Crowley	DRAFTDEVPLAN0275
John F. O'Connor	JFOC Design & Planning	Henry & Ted Crowley	DRAFTDEVPLAN0276
Hugh Lynn	Davy Hickey Properties	Citywest	DRAFTDEVPLAN0277
Hugh Lynn	Davy Hickey Properties	Citywest Ltd	DRAFTDEVPLAN0278
Hugh Lynn	Davy Hickey Properties	Citywest	DRAFTDEVPLAN0279
Johny Janssens		Johny Janssens	DRAFTDEVPLAN0280
L. Stakem			DRAFTDEVPLAN0281
A. Stakem			DRAFTDEVPLAN0282
Eugene Doherty			DRAFTDEVPLAN0283
Margaret McNevin			DRAFTDEVPLAN0284
John Leonard			DRAFTDEVPLAN0285

Person	Company (if applicable)	Body/Person(s) Represented (if applicable)	Ref
Olive Mary Mullen			DRAFTDEVPLAN0286
Patricia Skelly			DRAFTDEVPLAN0287
Olive Skelly			DRAFTDEVPLAN0288
Madeline & Patrick Kelly			DRAFTDEVPLAN0289
Thomas Herbert			DRAFTDEVPLAN0290
Etta Herbert			DRAFTDEVPLAN0291
Christina Leonard			DRAFTDEVPLAN0292
Mary Gaffney			DRAFTDEVPLAN0293
Evelyn Doherty			DRAFTDEVPLAN0294
Tom Phillips	Tom Phillips & Associates	National Vehicle Distribution	DRAFTDEVPLAN0295
Kieran Coakley			DRAFTDEVPLAN0296
Maurice Haughton			DRAFTDEVPLAN0297
Graham Walsh			DRAFTDEVPLAN0298
Frances Griffin			DRAFTDEVPLAN0299
Marie O'Keeffe			DRAFTDEVPLAN0300
Frank Kilbride			DRAFTDEVPLAN0301
Bridget Kilbride			DRAFTDEVPLAN0302
Bernie Finerty			DRAFTDEVPLAN0303
Frances Finerty			DRAFTDEVPLAN0304
Helena & Terry Foley			DRAFTDEVPLAN0305
Breda Murphy			DRAFTDEVPLAN0306
Thomas Clinton			DRAFTDEVPLAN0307
Beatrice Donnelly			DRAFTDEVPLAN0308
Jim Carroll			DRAFTDEVPLAN0309
Orla Carroll			DRAFTDEVPLAN0310
Hilary Walsh			DRAFTDEVPLAN0311
Carolyn Whelan			DRAFTDEVPLAN0312
Hugh & Reiltinn Reddy			DRAFTDEVPLAN0313
Martin Behan			DRAFTDEVPLAN0314
Finbarr Hurley			DRAFTDEVPLAN0315
Michael Cassidy			DRAFTDEVPLAN0316
Gerard Blake			DRAFTDEVPLAN0317
Olive Galvin			DRAFTDEVPLAN0318
Pat Phelan			DRAFTDEVPLAN0319
Suzanne Moran			DRAFTDEVPLAN0320
Catherine Turley			DRAFTDEVPLAN0321
Barbara Ward			DRAFTDEVPLAN0322
William Deverell			DRAFTDEVPLAN0323
Raymond O'Malley	Kieran O'Malley & Co.Ltd	Dominican Community at St. Mary's Priory, Tallaght	DRAFTDEVPLAN0324
Karen Donovan	OPW		DRAFTDEVPLAN0325
Joseph Scully			DRAFTDEVPLAN0326
Martin Skeritt			DRAFTDEVPLAN0327
Hester Scott			DRAFTDEVPLAN0328
Eoin Ryan			DRAFTDEVPLAN0329
BMA Planning	BMA Planning	Wilsons Auctions	DRAFTDEVPLAN0330
Orla Coakley			DRAFTDEVPLAN0331
Kieran Coakley			DRAFTDEVPLAN0332
Gerry McKenna			DRAFTDEVPLAN0333
Julie Mulleady	JCDecaux		DRAFTDEVPLAN0334

Person	Company (if applicable)	Body/Person(s) Represented (if applicable)	Ref
Victorica White	Dodder Action		DRAFTDEVPLAN0335
Mairead Forsythe	Dublin Cycling Campaign		DRAFTDEVPLAN0336
Paul Doyle	J.P. & M. Doyle	Mr Jim Brown	DRAFTDEVPLAN0337
Eamonn Prenter	Cunnane Stratton Reynolds	Chesterbridge Developments Ltd., and Maplewood Developments Ltd	DRAFTDEVPLAN0338
Michael O'Shea	JJM Holdings Limited		DRAFTDEVPLAN0339
Karen Donovan	OPW		DRAFTDEVPLAN0340
Eamonn Prenter	Cunnane Stratton Reynolds	Mr Alan Hanly	DRAFTDEVPLAN0341
Ian Whyte			DRAFTDEVPLAN0342
John Spain Associates	John Spain Associates	Tierra Ltd	DRAFTDEVPLAN0343
John Spain Associates	John Spain Associates	Peamount Healthcare	DRAFTDEVPLAN0344
John Spain Associates	John Spain Associates	Hibernia REIT Plc	DRAFTDEVPLAN0345
John Spain Associates	John Spain Associates	MLEU Dublin Limited	DRAFTDEVPLAN0346
John Spain Associates	John Spain Associates	M J Devitt	DRAFTDEVPLAN0347
John Spain Associates	John Spain Associates	Dublin City Services and Sports and Social Club	DRAFTDEVPLAN0348
Sheila Farrell			DRAFTDEVPLAN0349
Gavin Lawlor	Tom Phillips & Associates	Cape Wrath Hotel Limited	DRAFTDEVPLAN0350
Gavin Lawlor	Tom Phillips & Associates	Cape Wrath Hotel Limited	DRAFTDEVPLAN0351
Johny Janssens			DRAFTDEVPLAN0352
Tracy Armstrong	Fenton Associates	Maplewood Residential	DRAFTDEVPLAN0353
Tracy Armstrong	Fenton Associates	Di Waterside Co-ownership	DRAFTDEVPLAN0354
Tracy Armstrong	Fenton Associates	Kelland Homes Limited	DRAFTDEVPLAN0355
Brendan Gallagher		Landowner	DRAFTDEVPLAN0356
Douglas Hyde			DRAFTDEVPLAN0357
Jim Brogan	Jim Brogan	Mr Hugh Courtney	DRAFTDEVPLAN0358
Jim Brogan	Jim Brogan	Steelworks Tavens Limited c/o Celbridge Manor Hotel	DRAFTDEVPLAN0359
Jim Brogan	Jim Brogan	Dublin GAA County Board	DRAFTDEVPLAN0360
Louise Wills			DRAFTDEVPLAN0361
Maire McGreal			DRAFTDEVPLAN0362
Michael G Clarke	Michael G Clarke	Kennedy and Clarke Families	DRAFTDEVPLAN0363
Colette Colgan Fennessy			DRAFTDEVPLAN0364
Noeleen Fagan			DRAFTDEVPLAN0365
Bobby Stevens			DRAFTDEVPLAN0366
Lorraine Lavelle			DRAFTDEVPLAN0367
Grainne O'Donnell			DRAFTDEVPLAN0368
Julian Glavey			DRAFTDEVPLAN0369
Ann Marie Donaghy			DRAFTDEVPLAN0370
Mairead Flanagan			DRAFTDEVPLAN0371
Mark and Tina Walsh			DRAFTDEVPLAN0372
Yvonne Glavey			DRAFTDEVPLAN0373
Martin Donaghy			DRAFTDEVPLAN0374
Hugh O'Daly	H K O'Daly & Associates	Mr William James	DRAFTDEVPLAN0375
Hugh O'Daly	H K O'Daly & Associates	Mr Cyril Downing and Mr Louis Fitzgerald	DRAFTDEVPLAN0376
Hugh O'Daly	H K O'Daly & Associates	Mr William James	DRAFTDEVPLAN0377
Hugh O'Daly			DRAFTDEVPLAN0378

Person	Company (if applicable)	Body/Person(s) Represented (if applicable)	Ref
Anne Moloney			DRAFTDEVPLAN0379
John Wills			DRAFTDEVPLAN0380
Ciaran Dempsey			DRAFTDEVPLAN0381
Piarsa MacLoughlainn			DRAFTDEVPLAN0382
Angela O'Donoghue		Glendoher & District Residents Association	DRAFTDEVPLAN0383
Angela O'Donoghue		Rathfarnham Area Residents Association	DRAFTDEVPLAN0384
Brendan, Seamus, Dermot & John Reilly			DRAFTDEVPLAN0385
John Stenson		Firhouse Carmel FC	DRAFTDEVPLAN0386
Tom Gurrie			DRAFTDEVPLAN0387
Tom Walshe	Muir Associates	Therese Properties	DRAFTDEVPLAN0388
Tom Walshe	Muir Associates	Carmelite Sisters	DRAFTDEVPLAN0389
George Leigh			DRAFTDEVPLAN0390
Thomas Lyons			DRAFTDEVPLAN0391
Tony Confrey			DRAFTDEVPLAN0392
Tracy Foster			DRAFTDEVPLAN0393
Robert Porter			DRAFTDEVPLAN0394
Karl & Mary Kelly			DRAFTDEVPLAN0395
Tom & Jean Cantwell			DRAFTDEVPLAN0396
Tracy Hollingsworth			DRAFTDEVPLAN0397
The Griffin Family			DRAFTDEVPLAN0398
John Keogh	Citywise Education		DRAFTDEVPLAN0399
Tom & Jean Cantwell			DRAFTDEVPLAN0400
Shaw Conway		Shay Conway	DRAFTDEVPLAN0401
John Power			DRAFTDEVPLAN0402
Beverley Power			DRAFTDEVPLAN0403
Mr & Mrs Power		Members of The Board of Old Orchard Management Company	DRAFTDEVPLAN0404
Mr & Mrs Power			DRAFTDEVPLAN0405
Andrew Lyle			DRAFTDEVPLAN0406
Sandra Brophy			DRAFTDEVPLAN0407
Lauren Brophy			DRAFTDEVPLAN0408
Gabriel Brophy			DRAFTDEVPLAN0409
Martin Costello			DRAFTDEVPLAN0410
Joan Fagan			DRAFTDEVPLAN0411
Noel Mc Peake			DRAFTDEVPLAN0412
Carmel Mc Peake			DRAFTDEVPLAN0413
Deirdre Colgan			DRAFTDEVPLAN0414
Geraldine Cummins			DRAFTDEVPLAN0415
Karl Cummins			DRAFTDEVPLAN0416
Bernie Naughton			DRAFTDEVPLAN0417
Shane Ryan			DRAFTDEVPLAN0418
Ed Marshall			DRAFTDEVPLAN0419
Fiona Coyle Saunderson			DRAFTDEVPLAN0420
Aine Coyle			DRAFTDEVPLAN0421
Teresa Byrne			DRAFTDEVPLAN0422
Kevin Byrne			DRAFTDEVPLAN0423
Lydia Segrave			DRAFTDEVPLAN0424
Patrick Segrave			DRAFTDEVPLAN0425
Kevin Segrave			DRAFTDEVPLAN0426

Person	Company (if applicable)	Body/Person(s) Represented (if applicable)	Ref
Pat Leonard			DRAFTDEVPLAN0427
Janette Freeman			DRAFTDEVPLAN0428
Niall Murphy			DRAFTDEVPLAN0429
Anne Connolly			DRAFTDEVPLAN0430
Michael Doolin			DRAFTDEVPLAN0431
Noreen Gillespie			DRAFTDEVPLAN0432
Ann Moran			DRAFTDEVPLAN0433
Paddy & Kathleen Ryan			DRAFTDEVPLAN0434
Grace Bracken			DRAFTDEVPLAN0435
Mary Holden			DRAFTDEVPLAN0436
Denise Colgan			DRAFTDEVPLAN0437
Paul Tarragh			DRAFTDEVPLAN0438
Patrick Warren			DRAFTDEVPLAN0439
Edward Kennedy			DRAFTDEVPLAN0440
John Farrell			DRAFTDEVPLAN0441
Anthony & Mary Wills			DRAFTDEVPLAN0442
Ann Martin			DRAFTDEVPLAN0443
Michael Creagh			DRAFTDEVPLAN0444
Brendan O'Leary			DRAFTDEVPLAN0445
Catherine Manning			DRAFTDEVPLAN0446
Russell McSorley			DRAFTDEVPLAN0447
Amanda Roche			DRAFTDEVPLAN0448
Margaret Cronin			DRAFTDEVPLAN0449
Angela Smith			DRAFTDEVPLAN0450
David Nicholson			DRAFTDEVPLAN0451
Sean Fitzsimons			DRAFTDEVPLAN0452
Tony & Tiny Nolan			DRAFTDEVPLAN0453
Edward Murphy			DRAFTDEVPLAN0454
Noeleen Murphy			DRAFTDEVPLAN0455
John Rabbitt			DRAFTDEVPLAN0456
Brid Rabbitt			DRAFTDEVPLAN0457
Audrey Rabbitt			DRAFTDEVPLAN0458
Olive Kennedy			DRAFTDEVPLAN0459
Paul Kennedy			DRAFTDEVPLAN0460
Frank Mulholland			DRAFTDEVPLAN0461
Patricia O'Rourke			DRAFTDEVPLAN0462
Anne Leonard			DRAFTDEVPLAN0463
Robert McGovern			DRAFTDEVPLAN0464
Lynette McGovern			DRAFTDEVPLAN0465
John Walsh			DRAFTDEVPLAN0466
Seamus Furney			DRAFTDEVPLAN0467
John Cleaver			DRAFTDEVPLAN0468
John Owens			DRAFTDEVPLAN0469
Lisa McDonald			DRAFTDEVPLAN0470
Liz Moynihan			DRAFTDEVPLAN0471
Michael Kavanagh			DRAFTDEVPLAN0472
Joe Sherry			DRAFTDEVPLAN0473
Peter Marshall			DRAFTDEVPLAN0474
Peter Raju			DRAFTDEVPLAN0475
Particia Dolan			DRAFTDEVPLAN0476
Maureen O'Leary			DRAFTDEVPLAN0477

Person	Company (if applicable)	Body/Person(s) Represented (if applicable)	Ref
Philip Molloy			DRAFTDEVPLAN0478
Donna Kiernan			DRAFTDEVPLAN0479
Teresa Clancy			DRAFTDEVPLAN0480
Raymond Deegan			DRAFTDEVPLAN0481
Anne Tanered Deegan			DRAFTDEVPLAN0482
John P.Fagon			DRAFTDEVPLAN0483
Noelle Briggs			DRAFTDEVPLAN0484
David J Byrne	ESB Networks		DRAFTDEVPLAN0485
Brenda O'Connor			DRAFTDEVPLAN0486
Bernadette Weir			DRAFTDEVPLAN0487
Josie Flanagan		St.Marks Silver Surfers ARA	DRAFTDEVPLAN0488
Lara Gough	Eirgrid		DRAFTDEVPLAN0489
Patrick & Andrea Leonard			DRAFTDEVPLAN0490
John A Leonard			DRAFTDEVPLAN0491
Michael Mc Guirk	Michael J.McGuirk & Co.	Michael Mc Guirk	DRAFTDEVPLAN0492
Gilda Sisk	Notre Dame School		DRAFTDEVPLAN0493
Colm McGrath	Essential Services Ltd.	Denis & Sinead Casey	DRAFTDEVPLAN0494
Peter Cafferkey		Owners of the former Tara Co - op lands	DRAFTDEVPLAN0495
Patrick Leonard		An Taisce	DRAFTDEVPLAN0496
Mark Lynch		Edmondstown Golf Club	DRAFTDEVPLAN0497
Roger Garland	Keep Ireland Open		DRAFTDEVPLAN0498
James McInerney		Brian Prendergast	DRAFTDEVPLAN0499
Malachy Bradley	Eastern and Midland Regional Assembly		DRAFTDEVPLAN0500
Brian Wylie	Iarnród Éireann		DRAFTDEVPLAN0501
Ailis Strang	Fewer Harrington & Partners	Briarsgate Developments	DRAFTDEVPLAN0502
Johny & Katy Janssens			DRAFTDEVPLAN0503
Brian Mercer			DRAFTDEVPLAN0504
Denis Creedon	Denis Creedon & Co Ltd	Jean, Juliet, Maria & Donal McCarthy & Eleanor Burns	DRAFTDEVPLAN0505
Tara Spain	Bonneagar Iompair Éireann		DRAFTDEVPLAN0506
June O'Brien			DRAFTDEVPLAN0507
Stefan Foster			DRAFTDEVPLAN0508
Niall Morton	Mortons Pub		DRAFTDEVPLAN0509
Simon Dolan		Department of Arts, Heritage and the Gaeltacht	DRAFTDEVPLAN0510

0.4.0 NEXT STEPS

0.4.1 January Briefings

The Elected Members have up to 12 weeks (plus 9 extra days to account for the Christmas period) to consider this Chief Executive's Report in combination with the South Dublin County Council Draft Development Plan 2016 – 2022.

Details of the Draft County Development Plan Public Consultation will be included as a Headed Item on all Area Committee Meeting Agendas in January 2016. Briefings will also be scheduled in January 2016, which will provide Member's with an opportunity to discuss the contents of this Chief Executive's Report.

0.4.2 Consideration of Chief Executive's Report & Draft Plan

Special Meetings of South Dublin County Council will take place in February/March 2016. The date will be scheduled in consultation with elected members.

Pursuant to Section 12(11) of the Planning and Development Act 2000 (as amended), in making the Development Plan, South Dublin County Council is restricted to considering the proper planning and sustainable development of the area to which the development plan relates, the statutory obligations of the local authority and any relevant policies or objectives of the Government or any Minister of the Government.

Pursuant to Section 12(4) of the Planning and Development Act 2000 (as amended) where, following the consideration of the Draft Development Plan and this Chief Executive's Report, the members may, by resolution, accept or amend the draft plan and make the development plan accordingly at the Special Meetings. At this stage, the Development Plan will take effect 4 weeks from the day that it is made unless amendments that are considered to be material are made (see below).

0.4.3 Proposed Amendments – Stage 3

In the case where a proposed amendment or amendments would, if made, be a material alteration of the Draft Plan, it is a requirement under Section 12(7) of the Planning and Development Act 2000 (as amended) for the planning authority to publish notice of the proposed amendment(s) within 3 weeks after the passing of the resolution and to make the amendment(s) available for inspection and submission/observation for a period of not less than 4 weeks. A further Chief Executive's Report must be prepared within 8 weeks of the published notice of the proposed amendment(s).

It is then a requirement for the members of the authority, by resolution, to make the County Development Plan with or without the proposed amendment not later than 6 weeks after the submission of a Chief Executive's Report on the Material Alterations.

In the case where it is determined that a strategic environmental assessment and/or an appropriate assessment is or are required to be carried out in respect of one or more proposed material alteration(s), it is a requirement (within 2 weeks of the determination) for the Chief Executive to specify the period required for assessment following the passing of the resolution. In such instance it is a requirement of the planning authority to publish notice of the proposed material alteration and the determination to carry out the assessment or assessment(s).

0.5.0 SUBMISSIONS & OBSERVATIONS

A total of 751 broad issue areas were identified from the submissions and observations received during the prescribed public consultation period. Full summaries of all of the issues raised in the submissions and observations are set out in Section 0.5.2 below together with the responses and recommendations of the Chief Executive. The submissions from the Minister for the Environment Community and Local Government, the Eastern and Midland Regional Assembly and National Transport Authority are also summarised independently in Section 0.5.1.

The majority of the 751 broad issues that were identified from the submissions related directly to a chapter and subsection of the Draft Development Plan Written Statement or to the documents and maps that accompany the Written Statement including Environmental Reports, the Development Plan Maps and the zoning objectives of sites.

Issues have therefore been summarised under the relevant chapter, subsection or document heading in Section 0.5.2 of this report. Table 2 below sets out the number and percentage of broad issues that were raised according to the relevant chapter heading or document.

In terms of issues that were relevant to the Draft County Development Plan Review, issues relating to Chapter 6 Transport and Mobility were raised most frequently (15.2%/114 times), followed by Zoning Proposals (13.3%/100 times) and Chapter 11 Implementation (9.5%/11 times).

Table 2: Breakdown of Issues Raised

Topic/Chapter Heading	No. of Times Issue Raised in Submissions	% of Total
Chapter 1 Introduction & Core Strategy	15	2%
Chapter 2 Housing	32	4.3%
Chapter 3 Community Infrastructure	49	6.5%
Chapter 4 Economic Development & Tourism	40	5.3%
Chapter 5 Urban Centres & Retail	39	5.2%
Chapter 6 Transport & Mobility	114	15.2%
Chapter 7 Infrastructure & Environmental Quality	33	4.4%
Chapter 8 Green Infrastructure	32	4.3%
Chapter 9 Heritage, Conservation & Landscapes	62	8.3%
Chapter 10 Energy	12	1.6%
Chapter 11 Implementation	71	9.5%
Schedule 1 Record of Monuments & Places	3	0.4%
Schedule 2 Record of Protected Structures (RPS)	19	2.5%
Schedule 3 Interim Housing Strategy 2016-2022	1	0.1%
Zoning - Zoning Proposal	100	13.3%
County Development Plan Map(s)	38	5.1%
Accompanying Document - Environmental Report	5	0.7%
Accompanying Document - Screening for Appropriate Assessment	3	0.4%
Accompanying Document - Landscape Character Assessment of South Dublin County	1	0.1%
Other Issues	82	10.9%

0.5.1 Submissions from the Minister, Regional Authority and National Transport Authority

Section 12(4)(b) of the Planning and Development Act 2000 (as amended) requires this Chief Executive's Report to summarise the submissions or observations made by all persons and bodies. It is also specified that this shall include issues raised by the Minister and, in the case of a Planning Authority within the GDA such as South Dublin County Council, the issues and recommendations contained in the submissions of the DTA (now the National Transport Authority - NTA) and the relevant regional authority.

In view of these specific requirements and their strategic nature, the submissions and observations of the Minister for the Environment, Community and Local Government, the Eastern and Midland Regional Assembly and the National Transport Authority are identified separately below and summarised under the relevant sections and headings that pertain to the Draft County Development Plan.

Each summarised item is followed by the responses and recommendations of the Chief Executive. These summaries, responses and recommendation are also incorporated with all other summarise, responses and recommendations in Section 0.5.2 below.

0.5.1.1 Submission from the Minister for the Environment, Community & Local Government ([DRAFTDEVPLAN0183](#))

1.4.0 Core Strategy

Submission received from the Department of Environment, Community and Local Government (DECLG) notes that the Draft Plan includes Saggart/Citywest in the SDCC Settlement Strategy as a 'Moderate Sustainable Growth Town' (s.1.7.3), representing an addition to the GDA Settlement Strategy, proposed independently.

Submission notes that preparation of the Regional Spatial and Economic Strategy (RSES) will be undertaken by the Regional Assembly in conjunction with the constituent local authorities, and that any potential change to the Settlement Strategy at a regional level can appropriately be considered in this future statutory process for the RSES.

Submission notes that in the interim, it is premature for South Dublin County Council to propose this designation as it is uncertain what its meaning is. Submission advises omission of the proposed designation of Saggart/Citywest as a 'Moderate Sustainable Growth Town' from the Draft South Dublin County Development Plan as it is not consistent with the Settlement Strategy (section 4.5) of the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 as required by the Planning & Development Act 2010.

Chief Executive's Response and Recommendation

The Core Strategy settlement hierarchy contained in the Draft Plan 2016-2022 is based on the settlement hierarchy identified under the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 and has been advanced to align with the settlement typologies identified and defined under the Regional Planning Guidelines including those that relate to "Small Towns" and "Moderate Sustainable Growth Towns".

Saggart-Citywest has recently emerged as a settlement with a high level servicing function that is consistent with the characteristics of a Moderate Sustainable Growth Town as defined by the Guidelines. The population of Saggart-Citywest has also increased significantly in the last decade and exceeds the threshold identified for a "Small Town".

The proposed designation as a "Moderate Sustainable Growth Town" acknowledges the range of local services that have developed within the settlement area since the adoption of the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 including high quality public transport connections with Dublin City Centre and Tallaght (Luas Red Line), which support existing high level employment (Citywest Business Park and Hotel) and retail (Saggart Village and Citywest Shopping Centre) functions.

Taken in conjunction with the extent of economic activity, the quality of public transport provision and the designation of Citywest Shopping Centre as a Level 3 Retail Centre in the Retail Strategy for the Greater Dublin Area 2008-2016, it is considered that a Moderate Sustainable Growth Town designation appropriately reflects the settlement's capacity to provide for further sustainable housing growth that is linked to economic expansion, retail offer and public transport accessibility.

The emergence of Saggart-Citywest as a relatively self-sufficient settlement is evident from Census 2011 POWSCAR data, which reveals major employment growth in Citywest with a relatively high jobs yield of 33 jobs/ha. Data on trips to work reveals that Citywest achieved some of the highest level of trips by foot in the County (9-12%) and that, as an employment centre, Citywest benefits from having the highest concentrations of employees in the County from within the same or adjoining ED i.e. the largest number of trips to the ED for Citywest are from within the same ED and immediately adjoining E.Ds.

Within the context of the submission from the DECLG, the submission of the Eastern and Midland Regional Assembly on the Draft Plan advises that cognisance should be given to the Regional Planning Guidelines but also recognises that the Moderate Sustainable Growth Town designation for Saggart-Citywest "...is reflected in the level of existing development and services in this area coupled with infrastructural capacity for further residential development as expressed in the scale of zoned lands". This indicates that the planning rationale for the proposed designation is supported by the regional assembly.

Concern raised under the submission of the DECLG appears to be based on the timing of the proposed designation, pending the review of the Regional Planning Guidelines for the Greater Dublin Area 2010-2022. It is considered that in principle, neither the submission of the Regional Assembly or DECLG highlight an over-riding issue with the rationale for the proposed designation of Saggart/Citywest as a "Moderate Sustainable Growth Town". It is considered that at this stage of the Development Plan preparation process, the planning rationale for the designation, should take precedence over concerns in relation to the timing of the designation particularly in the context of the impending review of the Regional Planning Guidelines.

Recommendation: It is not recommended that the Draft County Development Plan be amended.

5.2.0 Retailing – Clondalkin and Liffey Valley

Submission received from the Department of Environment, Community and Local Government notes that the Urban Hierarchy of the County Development Plan (Figure 5.2) differs from the Retail Hierarchy (Figure 5.3) in that Liffey Valley Shopping Centre is a designated Level 2 Centre in the Retail hierarchy but is not featured in the Urban Hierarchy. Submission notes that, in addition, Clondalkin is one of a number of Level 3 district retail centres (including Rathfarnham, Crumlin, etc.) in the County Retail Strategy but is specified with its core retail area in Figure 5.5 (as for Tallaght and Liffey Valley, Level 2 Centres).

Submission requests SDCC to provide a clearer rationale for the omission of Liffey Valley from the Urban Hierarchy and confirmation that Clondalkin is a Level 3 Retail Centre albeit in the context of one of the County's two Town Centres.

Chief Executive's Response and Recommendation

In respect of the retail hierarchy, Liffey Valley Shopping Centre is designated as a Level 2 centre under the Retail Strategy for the Greater Dublin Area 2008-2016. The Draft Plan 2016-2022 reflects this status of the centre in Section 5.6.2 and provides a 'Major Retail Centre (MRC)' land use zoning for the site 'To protect, improve and provide for the future development of a Major Retail Centre.'

Liffey Valley functions successfully as a regional shopping centre predominantly served by the adjoining national road network. The wider mixed use residential, social, civic and commercial elements that would normally characterise a significant urban centre have not emerged at Liffey Valley. The non-retailing uses that have been developed are predominantly related to its location at a major road junction and are independent of the immediate catchment. The potential for a mixed use town centre at Liffey Valley is limited by virtue of its two road vehicular dominated accesses, the fragmented local catchment and the severance of the centre from the local catchment. The Chief Executive considers that the current and future role of Liffey Valley is as a regional shopping centre and that the wider urban centre uses should be promoted at more appropriate and accessible adjacent centres such as Clondalkin, Clonburris, Lucan and Palmerstown. The Draft Plan reflects this rationale through the provision of the MRC zoning for Liffey Valley and the removal of the shopping centre from the Urban Hierarchy of the County.

The Draft Plan includes an objective to prepare a Local Area Plan for the Major Retail Centre to reflect the Development Plan policy context and update the existing Liffey Valley Local Area Plan 2008.

In relation to the role of Clondalkin in terms of retail and urban hierarchy status, Section 5.1.0 Urban Centres and Section 5.2.0 Retailing (in particular 5.6.3 Clondalkin) of the Draft Plan independently provide policies and objectives for the urban centre and retailing role of Clondalkin. In recognition of the importance and diversity of Clondalkin, the Draft Plan designates Clondalkin as a Town Centre in the Urban Centre Hierarchy with a complimentary 'Town Centre' zoning. Section 5.1.0 of the Draft Plan refers.

In terms of retail, Clondalkin is designated as a Level 3 Retail Centre in the Retail Strategy for the GDA and the Draft Plan retail hierarchy. Section 5.6.3 of the Draft Plan outlines the retail policy for Clondalkin and states that it is the policy of the Council to maintain and enhance the Level 3 retailing function of Clondalkin Town Centre.

Having regard to the content of the submission, it is considered that an additional paragraph shall be added to Section 5.6.3 Clondalkin to cross reference the reader to the Urban Hierarchy section and clarify the retail and urban function status of Clondalkin.

Recommendation

It is recommended that the Draft County Development Plan be amended to include a paragraph in Section 5.6.3 Clondalkin to cross reference the reader to the Urban Hierarchy section and clarify the retail and urban function status of Clondalkin.

5.2.0 Retailing – Firhouse, Knocklyon and Palmerstown

Submission received from the Department of Environment, Community and Local Government notes that the Draft Plan proposes Firhouse, Knocklyon and Palmerstown as additional Level 3 District Centres for retailing.

Submission notes the relevant Retail Strategy for the GDA 2008-16 does not designate the locations of Firhouse, Knocklyon and Palmerstown as Level 3 Centres (Town and/or district centre & sub-county town centres); therefore the Draft Plan is not consistent with the Retail Hierarchy of Table E1 of the Retail Strategy for the GDA 2008-16. In addition, submission notes that the retail function of these additional locations above would be out of line with the 3 existing Level 3 centres and their inclusion would adversely affect the promotion of retail development in the county in a strategic and structured manner.

Submission therefore recommends removal of the proposed designations of Firhouse, Knocklyon and Palmerstown as Level 3 Retail Centres in the Retail Hierarchy (Section 5.2 and associated Table 5.2) from the Draft Plan as these designations are not consistent with the Retail Hierarchy (Table E1) of the Retail Strategy for the GDA 2008-16 as required by the Planning & Development Act 2010.

Chief Executive's Response and Recommendation

The Chief Executive has considered the contents of the submission in relation to the designation of Firhouse, Palmerstown & Knocklyon to Level 3 in the South Dublin County Retail Hierarchy.

In Part 6 of the Retail Strategy for the GDA, the following guidance is provided on what constitutes a District Centre: "District centres vary both in terms of the scale of provision and the size of catchment, due to proximity to a major town centre. Where the centre is close to existing major centres, the scale of retail and mixed provision is lower, with the centre range of shops meeting more basic day to day needs and only small scale range of comparison units trading. Such centres would generally cater for a population of 10,000- 40,000."

The Retail Planning Guidelines 2012 define a District Centre as follows: “Provides a range of retail and non-retail service functions (e.g. banks, post office, local offices, restaurants, public houses, community and cultural facilities) for the community at a level consistent with the function of that centre in the core strategy. They can be purpose built as in new or expanding suburbs or traditional district centres in large cities or town.”

The centres at Palmerstown, Firhouse and Knocklyon are located in a suburban environment, geographically located between village and town centres with substantial catchment within walking distance. The level of activity, range of uses and population catchment aligns with that of a District Centre in the context of the Retail Strategy for the GDA. It has consistently been Council policy to develop the County's District Centres as multi-faceted, mixed-use, higher density urban centres including residential, commercial, recreational, community and retail uses. As such, the application of a District Centre zoning reflects the variety of uses at these locations, which include retail. The Chief Executive acknowledges the concerns in relation the retail function of these centres and the potential to adversely affect the promotion of retail development in the county in a strategic and structured manner. In this context, the retail status of the centres is recommended to be reverted back to a Retail Level 4 status in line with the Retail Strategy for the GDA 2008-2016; however, in terms of the Urban Hierarchy, the District Centre zoning with accompanying policy context set out in Section 5.1.0 shall apply to the centres.

In summary, similar to Clondalkin, the urban and retail role of the centres shall be separated in policy terms and it is recommended that the retail status of Firhouse, Palmerstown and Knocklyon be reverted to a Level 4 in Section 5.2.2 to align with the Retail Strategy for the GDA but the District Centre (DC) zoning be retained to reflect the status of the centres in the communities and provide an appropriate policy context.

Recommendation: Retail status of Firhouse, Palmerstown and Knocklyon be reverted to Level 4 in Section 5.2.2

Retain the District Centre zoning for the centres and amend Section 5.6.2 and the land use zoning matrix accordingly to differentiate between Level 3 and Level 4 District centres.

6.4.0 Road and Street Network

Submission received from the Department of Environment, Community and Local Government notes that Table 6.5 of the Plan lists the proposed road construction/works programme over the 6 year period of the Plan including proposals to provide access to the N4 (Esker Lane, Tandy's Lane), N7 (Tay Lane) and M50 (Junction 8). The submission notes that the N4, N7 and M50 are designated national primary routes and proposals for design changes and/or access arrangements are a matter for the National Roads Authority (NRA), and that Section 2.6 of the Spatial Planning and National Roads Guidelines (2012) provides for the creation of new accesses onto national roads only in the context of a development plan preparation process subject to the specified approach detailing 'exceptional circumstances' in sections 2.6(1) & (2).

Submission states that the Plan has not, as required by section 2.6 of the Spatial Planning and National Roads Guidelines, detailed the rationale for new access arrangements at the proposed locations in accordance with the requirements of the Guidelines, and the relevant access objectives have the potential to generate traffic impacting adversely on the operation of this National Road Infrastructure. Accordingly, the submission requires SDCC to remove the proposals regarding new accesses to National primary routes from Table 6.6 (pg.111) and any supporting text in the Draft Plan as it is not consistent with section 2.2 of the Spatial Planning and National Roads Guidelines and would be premature pending consultation and agreement with the National Roads Authority, and would thus send conflicting signals to the wider community and developers.

Chief Executive's Response and Recommendation

It is noted that the Trans-European Transport Networks (TEN-T) Regulations have major implication for future access to the N4 and N7. The Regulations require the upgrade of the N7 to motorway or 'express road' standards between the M50 and Naas by 2030. The N4 is also considered part of the TEN-T comprehensive network.

Further to the submission of the DECLG, Transport Infrastructure Ireland (TII) have advised that the inclusion of a number of junction proposals contained within Table 6.5 Six Year Road Programme and Table 6.6 Medium to Long Term Road Objectives will compromise the requirements of TEN-T, including:

- Esker Lane/N4 - Junction re-opening and upgrade.
- Junction 8 (M50)
- Tandy's Lane/N4 - Junction re-opening and upgrade.
- Tay Lane/N7 Junction - Junction re-opening and upgrade.

It is accepted that access to the N4 and N7 will require the consent of the TII to be carried out. The support of the NTA and Department of Transport, Tourism and Sport (DTTS) would also be crucial, particularly if funding from a national agency was sought. Further to the submission of the DECLG it is noted that all three national transport agencies have objected to the proposals and the likelihood of them proceeding is improbable. There is a concern that including such proposals within the Plan may unduly raise community expectations and reduce its credibility.

Furthermore, it is also noted that the management of the M50 is the remit of the Transport Infrastructure Ireland (TII). The Draft Transport Strategy for the Greater Dublin Area 2016-2035 notes that 'traffic levels on the M50 have continued to grow, even during the economic downturn, and delays on this corridor are now a common feature, despite a near-doubling of its capacity in recent years'. The Transport Strategy also states that 'other than on the southern section of the route, further capacity enhancements to the M50 are neither physically possible nor environmentally desirable'.

As noted above and further to the submission of the DECLG, TII have also advised that the proposed Junction 8 (M50) contained within Table 6.6 Medium to Long Term Road Objectives will compromise the requirements of TEN-T. This junction was formally linked to the M7 project which has since been abandoned.

Recommendation:

That the following proposals for the following junctions be removed from Table 6.5 Six Year Road Programme and Table 6.6: Medium to Long Term Road Objectives:

- Fonthill Road/N4
- Esker Lane/N4
- Tandy's Lane/N4
- Tay Lane/N7 Junction
- Junction 8 (M50)

7.3.0 Flood Risk Management

Submission received from the Department of Environment, Community and Local Government notes that the Draft Plan is accompanied by a Strategic Flood Risk Assessment (SFRA) which is identified as a Stage 1 (Flood Risk Identification Report), and that in Section 5.3.14 of this report, several specific areas of the county are recommended for a Stage 2 Flood Risk Assessment as greater detail is required in relation to flood risk – Clonburris, Hazelhatch, Fortunestown, Jobstown, Aungierstown & Ballybane, Baldonnell, Ballycullen & Oldcourt, Brittas, Greenogue, Lucan Village and New Nangor Road.

Submission states that in accordance line with The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009, it is considered that this Stage 2 Flood Risk Assessment is required to inform the proposed zoning of lands for development in the Draft Plan. The submission states that this should include the

provision of maps clearly overlaying proposed zoned lands with lands indicated as in Flood Zones A, B & C as per the Guidelines; the sequential approach in flood risk management (see Figure 3.1 of the Planning Guidelines), and where applicable the justification test, need to be applied to the zoning of lands for development.

Chief Executive's Response and Recommendation

Flood Risk Assessment

As part of the County Development Plan and SEA process 2016-2022, an initial Strategic Flood Risk Assessment (SFRA) to inform the preparation of the Draft Plan was carried out by RPS consultants for the County to provide evidence based mapping of flood risk. This Flood Risk Identification Report was prepared having regard to the best available data at the time. In this context, it is noted that the Eastern CFRAM Flood Maps are in draft form and available to the public through statutory consultation from November 20th to December 23rd 2015. The OPW indicate that the flood mapping will be finalised in early 2016 and it is noted that the OPW submission outlines that the Eastern CFRAM study will, in improved detail, identify the fluvial flood zones for areas at significant risk and deliver draft flood maps as appropriate to a Stage 2 Flood Risk Assessment (FRA).

The OPW & Department of Environment, Community and Local Government submissions outline that the SDCC SFRA should include a Stage 2 Flood Risk Assessment for the specific areas detailed in Section 5.3 of the initial SFRA report if they are zoned/ proposed for zoning for development under the Development Plan. The initial SFRA to inform the Draft Plan focused on a number of areas of specific interest in the County. The selection of these areas were informed by the development scenarios considered for the formulation of the Core Strategy and the overlaying of the draft CFRAM flood risk mapping on the 2010-2016 Development Plan zonings. Further areas of interest emerged during the preparation of the Draft Plan in addition to the specific areas of interest identified in the initial SFRA to inform the Draft Plan. The OPW submission outlines that the Eastern CFRAM study identifies flood zones for areas at significant risk and delivers draft flood maps as appropriate to a Stage 2 Flood Risk Assessment (FRA). The publication of the finalised CFRAM mapping is expected in early 2016. It is considered that the availability of the Eastern CFRAM draft mapping and the initial SFRA by RPS consultants provides an evidence base equivalent of a Stage 2 Flood Risk Assessment. Having regard to the status of the available information and the additional areas of specific interest, the initial SFRA to inform the Draft Plan requires amendment.

Development Plan Preparation & Flood Risk

A strategic approach to the management of flood risk is a high priority for South Dublin, this is especially so given the strategic importance of the County in the Greater Dublin Area.

The Guidelines outline that the sequential approach should be applied to all stages of planning and it is of particular importance at the plan making stage. As part of the Development Plan review process, having prepared an initial Strategic Flood Risk Assessment and overlaying the flood maps on the 2010-2016 Development Plan zoning map and on the emerging Draft Plan zoning maps, the Planning Authority considered the zoning of areas at a high or moderate risk of flooding.

In relation to existing undeveloped zoning lands at risk of flooding, the Planning Authority had regard to Section 4.26 and 4.27 of the Guidelines in reconsidering the zoning. Following this reconsideration, the Planning Authority implemented a range of decisions in various areas of the County:

- Removed the existing zoning for all types of development on the basis of the unacceptable high level of flood risk;
- Required the preparation of an approved area plan on strategic residential zonings. Local Area Plans, SDZs and other land use plans shall be required to include a detailed flood risk assessment to prepare a strategy for development in more detail and prior to any development.

- Where the criteria of the Justification Test have been met, retain the zoning and require a detailed flood risk assessment and the application of Section 5 of the Guidelines.

When applications are being considered at Development Management stage, the sequential approach and Justification Test for Development Management will be applied on a site by site basis and with reference to SFRA and the Flood Risk Management Guidelines. Notwithstanding the land use zoning, not all uses will be appropriate on flood risk grounds. For example, a proposal in zoning objective Town Centre (TC) could include a highly vulnerable crèche, less vulnerable retail and water compatible car parking but they would not be equally permissible on the ground floor within a Flood Zone A or B.

A summary of predominant land use and flood risks associated with each of the zoning objectives has been provided in the Table below. It should be noted that this table is intended as a guide only and should be read in conjunction with the detailed assessment of risks and the overall SFRA.

Table: Land Use Zoning Vulnerability

Zone Abbreviated	Objective	Indicative Primary Vulnerability	Flood Risk Comment
RES	To protect and/or improve residential amenity	Highly Vulnerable	RES zoning generally not appropriate in areas at risk of flooding.
RES-N	To provide for new residential communities in accordance with approved area plans	Highly Vulnerable	RES-N zoning generally not appropriate for extensive areas at risk of flooding. Sequential approach may be applied in the strategy of the approved plan to locate water compatible elements within Flood Zone A or B. Flood Risk should be assessed and managed in accordance with the SFRA and Guidelines, and applying the sequential approach.
SDZ	To provide for strategic development in accordance with approved planning schemes	Less Vulnerable / Highly Vulnerable	Mixes of uses within this zoning objective are possible and SDZs are generally not appropriate for extensive areas at risk of flooding. Sequential approach may be applied to the SDZ scheme to locate water compatible and less vulnerable elements within Flood Zone A or B. Flood Risk should be assessed and managed in accordance with the SFRA and Guidelines, and applying the sequential approach.
REGEN	To facilitate enterprise and/or residential led regeneration	Less Vulnerable / Highly Vulnerable	A mix of uses within this zoning objective are possible, including residential. REGEN zoning generally not appropriate in areas at risk of flooding.
TC	To protect, improve and provide for the future development of Town Centres	Less Vulnerable/ Highly Vulnerable	A mix of uses within this zoning objective are possible. Flood Risk should be assessed and managed in accordance with the SFRA and Guidelines, and applying the sequential approach.
DC	To protect, improve and provide for the future development of District Centres	Less Vulnerable / Highly Vulnerable	A mix of uses within this zoning objective are possible. Flood Risk should be assessed and managed in accordance with the SFRA and Guidelines, and applying the sequential approach.
VC	To protect, improve and provide for the future development of Village Centres	Less Vulnerable / Highly Vulnerable	A mix of uses within this zoning objective are possible. Flood Risk should be assessed and managed in accordance with the SFRA and Guidelines, and applying the sequential approach.
MRC	To protect, improve and provide for the	Less Vulnerable	Generally appropriate in Flood Zone B and extensions of existing development in Flood Zone A are justified, subject to site specific FRA.

	future development of a Major Retail Centre		
LC	To protect, improve and provide for the future development of Local Centres	Less Vulnerable / Highly Vulnerable	A mix of uses within this zoning objective are possible. Flood Risk should be assessed and managed in accordance with the SFRA and Guidelines, and applying the sequential approach.
EE	To provide for enterprise and employment related uses	Less Vulnerable	EE zoning is generally appropriate in Flood Zone B. Zoning in Flood Zone A subject to sequential approach and justification test.
RW	To provide for and consolidate retail warehousing	Less Vulnerable	Generally appropriate in Flood Zone B and extensions of existing development in Flood Zone A are justified, subject to site specific FRA.
HA-DM	To protect and enhance the outstanding natural character of the Dublin Mountains Area	Water compatible	Land use zone appropriate for all Flood Zones. Ancillary development to be assessed in accordance with the sequential approach.
HA-LV	To protect and enhance the outstanding character and amenity of the Liffey Valley	Water compatible	Land use zone appropriate for all Flood Zones. Ancillary development to be assessed in accordance with the sequential approach.
HA-DV	To protect and enhance the outstanding character and amenity of the Dodder Valley	Water compatible	Land use zone appropriate for all Flood Zones. Ancillary development to be assessed in accordance with the sequential approach.
OS	To preserve and provide for open space and recreational amenities	Water compatible	Land use zone appropriate for all Flood Zones. Ancillary development to be assessed in accordance with the sequential approach.
RU	To protect and improve rural amenity and to provide for the development of agriculture	Water compatible	In general, the rural zone will include water compatible uses, but individual and clusters of residential and other developments may arise. Development to be assessed in accordance with the sequential approach.

Note: Table is intended as a guide only and should be read in conjunction with the detailed assessment of risks and the overall SFRA.

The Planning System and Flood Risk Management Guidelines (Flood Guidelines) outlines that a Strategic Flood Risk Assessment (SFRA) is an area-wide examination (up to county scale) of the risks of flooding to support spatial planning decisions such as the zoning of particular areas for development. It is an essential element in the adoption of the sequential approach to the consideration of flood risk in spatial planning. The initial SFRA for the Draft Plan and the draft CFRAM maps have supported the application of the sequential approach and where applicable the justification test to existing and proposed zoning in the preparation of the Draft Plan. The Planning Authority have overlaid the best available flood maps at each stage of the Development Plan process on the historical and proposed zonings for the County as part of carrying out the sequential approach. The table below summaries the application of the Sequential Approach to the Land Use Zoning Objectives for the specified areas. It is noted that as part of the application of the sequential approach and the justification test process, the zoning of lands at Moneenalion Commons, Baldonnell and at Watery Lane, Clondalkin is recommended to be rezoned to Rural (RU) and Open Space (OS) respectively. Furthermore, the consideration of submissions, in particular zoning proposals, in this Chief Executive's Report includes details of the identified flood risk.

Table: Application of Sequential Approach to Specified Areas

Area	Sequential Approach to Land Use Zoning	Recommended Land Use Zoning Strategy
Brittas	Avoid	Lands in vicinity of Brittas zoned for HA-DM
Hazelhatch	Avoid	Lands in vicinity of Hazelhatch zoned for HA-DM
Clonburris	Justification Test (see below)	SDZ
Fortunestown	Justification Test (see below)	RES-N
Jobstown / Killinarden	Justification Test (see below)	RU and RES on existing, developed, zoned areas
Aungierstown & Ballybane	Justification Test (see below)	EE
Rathcoole & Saggart	Avoid	Relevant lands zoned RU & OS
Baldonnell	Avoid	These areas are existing zoned undeveloped lands zoned EP1 in the 2010 – 2016 Development Plan. Rural (RU) zoning is recommended. Section 4.26 & 4.27 of Guidelines applicable.
Newcastle	Avoid	Relevant lands zoned RU
Ballycullen & Oldcourt	Justification Test (see below)	RES-N on undeveloped lands and RES on existing, developed, zoned areas
Greenogue	Justification Test (see below)	EE – existing, developed, zoned areas
Templeogue	Justification Test (see below)	RES – existing, developed, zoned areas
New Nangor Road & Naas Road	Avoid & Justification Test (see below)	EE zoning on existing, developed, zoned areas retained. Regeneration (REGEN) zoning avoided.
Rathfarnham	Justification Test (see below)	RES – existing, developed, zoned areas
Clondalkin	Justification Test (see below)	RES on existing, developed, zoned areas
Watery Lane, Clondalkin	Avoid	Circa 70% of the 3.1ha lands zoned RES identified within Flood Zones. OS recommended on undeveloped land zoned RES in 2010 – 2016 Development Plan.
Lands Adamstown South, south of Adamstown Link Road and north of Grand Canal (Beattie's Field)	Justification Test (see below)	RES-N

Justification Test

The areas requiring a Justification Test above can be divided into the following categories:

- Existing, developed, zoned areas at risk of flooding
- Undeveloped lands at risk of flooding

Existing, developed, zoned areas at risk of flooding

There are a number of such areas in the County identified on the Flood Zone maps, including existing housing areas at Clondalkin (Camac), Rathfarnham (Whitechurch Stream), Templeogue/ Terenure (Poddle), Jobstown/ Killinarden (Tallaght Stream), Oldcourt (Oldcourt Stream) and Ballycullen (Ballycullen Stream).

It is considered that it would be unrealistic to rezone these lands for less vulnerable uses in areas that are fully developed. The Justification Test in relation to these areas of existing housing in the County is outlined below in the Table.

In applying the Justification Test Part 3, consideration has been given to structural and non-structural measures identified in the SFRA which may be required prior to further development taking place. The Draft Plan shall include details of requirements for applicants in flood risk areas. In most locations, future opportunities for

development are likely to be limited to small extensions, infill houses or small commercial units and changes of use. As such, in most of these built up areas, flood risk can be addressed through requiring a site specific flood risk assessment which will identify appropriate mitigation measures such as retaining flow paths, flood resilient construction and emergency planning.

Table: Justification Test for zoning objectives RES areas in the County that are already developed and include existing vulnerable uses in Zone A and /or B.

Criteria	Response
The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.	<p>The National Spatial Strategy 2002-2022 is a twenty year plan for the Country and consolidating the Greater Dublin Area, a Gateway, is a primary policy of this Strategy.</p> <p>The Consolidation Area within the Gateway of Dublin is identified within the top tier of the settlement hierarchy in accordance with the Regional Planning Guidelines in order to promote the consolidation and sustainable intensification of the existing urban/built form to the east of the M50 thereby maximising efficiencies from establishing physical and social infrastructure.</p> <p>Lucan, Tallaght and Clondalkin are designated Metropolitan Consolidation Towns in the Regional Planning Guidelines for the Greater Dublin Area 2010 – 2022. (see Core Strategy Map- page 10 of Draft Plan)</p>
The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:	
Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:	All of these areas are developed areas that include suburban housing and are essential in order to support the continued viability of the urban centres in the County.
Comprises significant previously developed and/or under-utilised lands:	The subject lands accommodate existing development and are therefore previously developed lands.
Is within or adjoining the core of an established or designated urban settlement:	The subject developed lands are within the Metropolitan Area of the Greater Dublin Area.
Will be essential in achieving compact and sustainable urban growth; and,	The subject lands accommodate existing development and are therefore previously developed lands. These lands are already essential in achieving and maintaining compact and sustainable urban growth.
There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	The subject lands accommodate existing development and are therefore previously developed lands. This criterion is set aside in accordance with the Circular PL 2/2014.
A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.	
<p>A SFRA has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process. The SFRA outlines how development can be adequately managed. Additional development such as small scale infill housing, extensions or changes of use have been considered and, subject to site specific flood risk assessment, can generally be considered appropriate provided they constitute a continuation of the existing level of development. An appropriately detailed flood risk assessment will be required in support of any planning application. The level of detail will vary depending on the risks identified and the proposed land use.</p> <p>The Development Plan shall incorporate the requirement to consider such measures outlined in the SFRA and provide an objective to support and facilitate the delivery of flood alleviation schemes.</p>	

There are a number of areas in the County identified on the Flood Zone maps accommodating existing industrial development, namely sections in proximity to the New Nangor Road, Naas Road and Greenogue Industrial Estate.

It is noted that the areas are zoned EE and generally provides for less vulnerable uses. It is considered that it would be unrealistic to rezone these lands for water compatible uses as they are fully developed. The Justification Test in relation to these areas of existing developed zoned lands in the County is outlined below in the Table.

In applying the Justification Test Part 3, consideration has been given to structural and non-structural measures identified in the SFRA which may be required prior to further development taking place. The Development Plan shall include details of requirements for applicants in flood risk areas. In most locations, future opportunities for development are likely to be limited to extensions, replacement units, small commercial units, changes of uses or water compatible uses. As such, in most of these built up areas, flood risk can be addressed through requiring a site specific flood risk assessment which will identify appropriate mitigation measures such as retaining flow paths, flood resilient construction and emergency planning.

Table: Justification Test for zoning objectives EE areas in the County that are already developed and include existing less vulnerable uses in Zone A.

Criteria	Response
The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.	<p>The National Spatial Strategy 2002-2022 is a twenty year plan for the Country and consolidating the Greater Dublin Area, a Gateway, is a primary policy of this Strategy.</p> <p>The Consolidation Area within the Gateway of Dublin is identified within the top tier of the settlement hierarchy in accordance with the Regional Planning Guidelines in order to promote the consolidation and sustainable intensification of the existing urban/built form to the east of the M50 thereby maximising efficiencies from establishing physical and social infrastructure.</p> <p>The NSS favours the physical consolidation of Dublin's Metropolitan Area as an essential requirement for a competitive Dublin. It seeks to sustain Dublin's role as the engine of the national economy and seeks to bring people, employment and services closer together to create a better quality of life, less congestion, reduced commuting distances, more regard to the quality of the environment and increased access to services like health, education and leisure</p> <p>These established areas are key strategic locations for enterprise and employment within the Metropolitan Area of Dublin.</p>
The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:	
Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:	All of these areas are developed areas and are essential in order to support the continued economic viability of the Metropolitan Area.
Comprises significant previously developed and/or under-utilised lands:	The subject lands accommodate existing development and are therefore previously developed lands.
Is within or adjoining the core of an established or designated urban settlement:	The subject developed lands are predominantly within the Metropolitan Area of the Greater Dublin Area.
Will be essential in achieving compact and sustainable urban growth; and,	The subject lands accommodate existing development.
There are no suitable alternative lands for the particular use or development type, in areas at	The subject lands accommodate existing development and are therefore previously

lower risk of flooding within or adjoining the core of the urban settlement.	developed lands. This criterion is set aside in accordance with the Circular PL 2/2014.
A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.	
A SFRA has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process. The SFRA outlines how development can be adequately managed. Additional development have been considered and, subject to site specific flood risk assessment, can generally be considered appropriate provided they constitute a continuation of the existing level of development. An appropriately detailed flood risk assessment will be required in support of any planning application. The level of detail will vary depending on the risks identified and the proposed land use.	
The Development Plan shall incorporate the requirement to consider such measures outlined in the SFRA and provide an objective to support and facilitate the delivery of flood alleviation schemes.	

There are a number of areas in the County identified on the Flood Zone maps accommodating existing industrial development, namely sections in proximity to the New Nangor Road, Naas Road and Greenogue Industrial Estate.

It is noted that the areas are zoned EE and generally provides for less vulnerable uses. It is considered that it would be unrealistic to rezone these lands for water compatible uses as they are fully developed. The Justification Test in relation to these areas of existing developed zoned lands in the County is outlined below in the Table.

In applying the Justification Test Part 3, consideration has been given to structural and non-structural measures identified in the SFRA which may be required prior to further development taking place. The Development Plan shall include details of requirements for applicants in flood risk areas. In most locations, future opportunities for development are likely to be limited to extensions, replacement units, small commercial units, changes of uses or water compatible uses. As such, in most of these built up areas, flood risk can be addressed through requiring a site specific flood risk assessment which will identify appropriate mitigation measures such as retaining flow paths, flood resilient construction and emergency planning.

Table: Justification Test for zoning objectives EE areas in the County that are already developed and include existing less vulnerable uses in Zone A.

Criteria	Response
The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.	<p>The National Spatial Strategy 2002-2022 is a twenty year plan for the Country and consolidating the Greater Dublin Area, a Gateway, is a primary policy of this Strategy.</p> <p>The Consolidation Area within the Gateway of Dublin is identified within the top tier of the settlement hierarchy in accordance with the Regional Planning Guidelines in order to promote the consolidation and sustainable intensification of the existing urban/built form to the east of the M50 thereby maximising efficiencies from establishing physical and social infrastructure.</p> <p>The NSS favours the physical consolidation of Dublin's Metropolitan Area as an essential requirement for a competitive Dublin. It seeks to sustain Dublin's role as the engine of the national economy and seeks to bring people, employment and services closer together to create a better quality of life, less congestion, reduced commuting distances, more regard to the quality of the environment and increased access to services like health, education and leisure</p> <p>These established areas are key strategic locations for enterprise and employment within the Metropolitan Area of Dublin.</p>

The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:	
Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:	All of these areas are developed areas and are essential in order to support the continued economic viability of the Metropolitan Area.
Comprises significant previously developed and/or under-utilised lands:	The subject lands accommodate existing development and are therefore previously developed lands.
Is within or adjoining the core of an established or designated urban settlement:	The subject developed lands are predominantly within the Metropolitan Area of the Greater Dublin Area.
Will be essential in achieving compact and sustainable urban growth; and,	The subject lands accommodate existing development.
There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	The subject lands accommodate existing development and are therefore previously developed lands. This criterion is set aside in accordance with the Circular PL 2/2014.
A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.	
A SFRA has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process. The SFRA outlines how development can be adequately managed. Additional development have been considered and, subject to site specific flood risk assessment, can generally be considered appropriate provided they constitute a continuation of the existing level of development. An appropriately detailed flood risk assessment will be required in support of any planning application. The level of detail will vary depending on the risks identified and the proposed land use.	
The Development Plan shall incorporate the requirement to consider such measures outlined in the SFRA and provide an objective to support and facilitate the delivery of flood alleviation schemes.	

Undeveloped zoned lands at risk of flooding

The Justification Test was carried out for the entire RES-N, EE & SDZ zoned lands located at Ballycullen-Oldcourt, Clonburris, Beattie's Field, Grange Castle and Fortunestown in the Draft Plan. In these instances, the extent of the lands within Flood Zones A or B is insignificant in the context of the wider overall lands zoned at the location. Whilst lands are being retained with a zoning objective which includes development, applying the Guidelines to the formulation of local area plans and at Development Management stage means such development will be restricted to Flood Zone C, with less vulnerable and/or water compatible uses located within Zone A and B as appropriate.

Fortunestown Local Area Plan Lands

The subject lands are zoned 'A1' in the 2010 – 2016 Development Plan and as such, are generally categorised as undeveloped, zoned lands at risk of flooding. Fortunestown is an area within the identified Moderate Sustainable Growth Town of Saggart/ Citywest. Objective RES-N 'to provide for new residential communities in accordance with approved area plans' is applied to 108 ha of land in the area. Approximately 7.5 % of the overall RES-N lands have been identified to be at risk of flooding and are within both Flood Zone A and B. To determine the appropriateness of the zoning at Fortunestown, the sequential approach has been applied, which has culminated in application of the Justification Test.

It is a requirement under the Planning and Development Act 2000 (as amended) for the County Development Plan including its Core Strategy to be consistent with the Regional Planning Guidelines for the Greater Dublin Area 2010 – 2022 and to ensure that there are sufficient and suitable lands zoned to meet the population and housing requirements for the County. As outlined in the Core Strategy and in accordance with housing targets set by the Regional Planning Guidelines, South Dublin County

Council are obliged to provide zoned lands in appropriate locations to accommodate for over 32,000 dwellings during the lifetimes of the County Development Plan.

Saggart-Citywest is identified in the Core Strategy as a Moderate Sustainable Growth Town as defined by the Guidelines. The designation as a Moderate Sustainable Growth Town acknowledges the range of local services that have developed within the settlement area including high quality public transport connections with Dublin City Centre and Tallaght (Luas Red Line), which support existing high level employment (Citywest Business Park and Hotel) and retail (Saggart Village and Citywest S.C.) functions.

As such, it is considered that there are no alternative unzoned lands available for significant development such as that envisaged at Saggart/ Citywest with equivalent infrastructure and services. The Fortunestown Local Area Plan 2012 was prepared having regard to the best available flood risk data at the time and consideration of the land use strategy in the LAP included for flood risk and advocates the application of the sequential test to direct water compatible elements of the LAP to the Flood Zone A areas. The flood risk information for the LAP in relation to the catchment included alluvial soils as a surrogate for Flood Risk, OPW recorded Flood Events, other information from the OPW website www.floodmaps.ie, the Preliminary Flood Risk Assessment (PFRA) carried out by the OPW and indicative Flood Risk mapping for the Fortunestown LAP area modelled by JBA Consulting. The flood risk mapping information from JBA Consulting and the OPW PFRA identify sites for detailed site-specific Flood Risk Assessment and appropriate responses at planning application stage in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 is provided in the Local Area Plan.

Furthermore, the Fortunestown LAP states: "In assessing development proposals in areas identified at risk of flooding, South Dublin County Council will adopt a risk-based sequential and balanced approach, while at the same time allowing consideration of appropriate and necessary development, including the application of the Justification Test in accordance with Policies WD13 (Risk of Flooding) and WD14 (Identified Flood Risk Areas) of the South Dublin County Council Development Plan 2010 – 2016"

It is therefore an objective of the Local Area Plan that:

"All planning applications for residential and/or commercial floorspace on sites in areas at risk of flooding shall be accompanied by a Flood Risk Assessment that is carried out at the site-specific level in accordance with 'The Planning System and Flood Risk Management – Guidelines for Planning Authorities' (2009). The scope of flood risk assessment shall depend on the type and scale of development and the sensitivity of the area. (Objective GI7)"

The Guidelines state that where an Authority is considering the future development of areas in an urban settlement that are at moderate or high risk of flooding, for uses or development vulnerable to flooding that would generally be inappropriate, it must be satisfied that it can clearly demonstrate on a solid evidence base that the zoning will satisfy the 'Justification Test'. Section 4.23 of the Guidelines relate to the 'Justification Test' and outline the three criteria that must be satisfied.

Table: Justification Test for RES-N lands covered by Fortunestown LAP

Criteria		Response
1.	The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.	<p>The National Spatial Strategy 2002-2022 is a twenty year plan for the Country and consolidating the Greater Dublin Area, a Gateway, is a primary policy of this Strategy.</p> <p>The Consolidation Area within the Gateway of Dublin is identified within the top tier of the settlement hierarchy in accordance with the Regional Planning Guidelines in order to promote the consolidation and sustainable intensification of the existing urban/built form thereby maximising efficiencies from establishing physical and social infrastructure.</p> <p>Saggart-Citywest is identified in the Core Strategy as a Moderate Sustainable Growth Town as defined by the Guidelines. The designation as a Moderate Sustainable Growth Town acknowledges the range of local services that have developed within the settlement area since the adoption of the Regional Planning Guidelines for the Greater Dublin Area 2010 – 2022 including high quality public transport connections with Dublin City Centre and Tallaght (Luas Red Line), which support existing high level employment (Citywest Business Park and Hotel) and retail (Saggart Village and Citywest S.C.) functions</p>
2.	The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:	
2(i)	Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:	It is considered that the lands at Saggart/ Citywest (Fortunestown LAP 2012) are essential to allow for growth and expansion of South Dublin in order to meet the targets as set out in the RPGs.
2(i i)	Comprises significant previously developed and/or under-utilised lands:	The subject lands consist of significant underutilised land suitable for a higher density type development, proximate to the Luas.
2(i ii)	Is within or adjoining the core of an established or designated urban settlement:	The lands at Saggart/ Citywest fall within the Metropolitan Area of the GDA.
2(i v)	Will be essential in achieving compact and sustainable urban growth; and,	The future development of these lands will be in accordance with the approved Fortunestown LAP 2012 prepared in accordance with Ministerial guidance documents.
2(v)	There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	There are no alternative unzoned site available for significant development such as that envisaged at Saggart/ Citywest with equivalent established infrastructure and services.
3.	A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.	
	A SFRA has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process. The SFRA mapping identifies Flood Zone A and B on a portion of the overall RES-N lands within the Fortunestown LAP boundary. The lands within Flood Zone A are undeveloped. The Fortunestown Local Area Plan 2012 was prepared having regard to the best available flood data at the time and consideration of the strategy in the LAP. Although residential uses have been identified for the overall area, the LAP identified flood risk areas and the overall strategy was prepared having regard to the sequential approach within the plan boundary, focusing the residential housing in Flood Zone C and directing open space, roads and gardens in Flood Zones A and B. Objective G17 of the LAP states that all planning applications for residential and/or commercial floorspace on sites in areas at risk of flooding shall be accompanied by a Flood Risk Assessment that is carried out at the site-specific level in accordance with The Planning System and Flood Risk Management – Guidelines for Planning Authorities 2009. The scope of flood risk assessment shall depend on the type and scale of development and the sensitivity of the area.	

Ballycullen - Oldcourt Local Area Plan Lands

The subject lands are zoned 'A1' in the 2010 – 2016 Development Plan and as such, are generally categorised as undeveloped, zoned lands at risk of flooding. Ballycullen - Oldcourt is an area within the Metropolitan Consolidation Area of the Dublin Gateway as identified under the Regional Planning Guidelines. Objective RES-N 'to provide for new residential communities in accordance with approved area plans' is applied to 87 ha of land in the area. Approximately 8% of the overall RES-N lands have been identified to be at risk of flooding in the SFRA (based on PFRA data). To determine the appropriateness of the RES-N zoning at Ballycullen - Oldcourt, the sequential approach has been applied, which has culminated in application of the Justification Test.

It is a requirement under the Planning and Development Act 2000 (as amended) for the County Development Plan including its Core Strategy to be consistent with the Regional Planning Guidelines for the Greater Dublin Area 2010 – 2022 and to ensure that there are sufficient and suitable lands zoned to meet the population and housing requirements for the County. The Core Strategy in the Draft Plan identifies a growth in population of over 26,300 people and a need for over 32,000 dwellings during the lifetime of the County Development Plan and it is a requirement to ensure that enough lands are zoned for such need and in appropriate places.

Ballycullen - Oldcourt is an area within the Metropolitan Consolidation Area of the Dublin Gateway as identified under the Regional Planning Guidelines. It is policy of the Regional Planning Guidelines (RPGs) to gain maximum benefit from existing assets in the Metropolitan Consolidation Area, including public transport and social infrastructure, through consolidation within the exiting built footprint of the City and the Inner Suburbs. This is seen as particularly important as falling occupancy levels and aging populations are placing the viability existing services and facilities such as schools across the Metropolitan Area at risk.

As such, it is considered that there are no alternative unzoned lands available for significant development such as that envisaged at Ballycullen - Oldcourt with equivalent infrastructure and services. The Ballycullen - Oldcourt Local Area Plan 2014 was prepared having regard to the best available flood data (OPW - PFRA) at the time and consideration of the land use strategy and objectives in the LAP included for directing water compatible elements in Flood Zones.

The LAP includes the following objectives:

"All planning applications for development in areas at risk of flooding shall be accompanied by a Flood Risk Assessment carried out at the site-specific level in accordance with The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009).

The scope of flood risk assessment should depend on the type and scale of development and the sensitivity of the area. Site specific flood risk assessment of lands identified as being at risk of flooding will entail Stage 3 Detailed Risk Assessment carried out by suitably qualified and independent hydrological consultants that are acceptable to the Council. Where avoidance of flood risk is not possible, vulnerable uses such as residential, community and commercial uses should be substituted with less vulnerable uses such as parks and open spaces. (Objective GI8)

All proposals, particularly those within the catchment of the Ballycullen Stream, shall demonstrate and ensure that they do not increase the risk/impact of flooding on downstream estates including Castlefield Manor, Glenvara, Glenlyon and Homeville. (Objective GI9)

Any proposed development on the Oldcourt GAA pitches that is potentially sensitive to flooding shall be subject to the sequential approach of avoid, substitute, justify, mitigate and (where the Justification Test has been passed) manage flood risks in accordance with The Planning System and Flood Risk Management– Guidelines for

Planning Authorities (2009). These areas will require Site Specific Stage 3 Detailed Flood Risk Assessment including the likely impact of any displaced flood water on third parties. If it cannot be demonstrated that both the actual and residual flooding issues can be dealt with in an acceptable manner including the impact of any displaced flood water on third parties, then the development of these lands shall be confined to water compatible development only (in accordance with the precautionary approach) such as amenity spaces, outdoor sports and recreation spaces that include SUDS elements and integrate with the SUDS strategy for the Plan Lands. Any required works to upgrade or replace existing drainage systems or channels (such as culverts) upstream or downstream of a development shall be borne by the developer and shall adhere to SUDS principles. (Objective SSP27)”

The Guidelines state that where an Authority is considering the future development of areas in an urban settlement that are at moderate or high risk of flooding, for uses or development vulnerable to flooding that would generally be inappropriate, it must be satisfied that it can clearly demonstrate on a solid evidence base that the zoning or designation for development will satisfy the ‘Justification Test’. Section 4.23 of the Flooding Guidelines relate to the ‘Justification Test’ and outline the three criteria that must be satisfied.

Table: Justification Test for RES-N lands covered by Ballycullen – Oldcourt LAP

Criteria	Response
The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.	The National Spatial Strategy 2002-2022 is a twenty year plan for the Country and consolidating the Greater Dublin Area, a Gateway, is a primary policy of this Strategy. The Consolidation Area within the Gateway of Dublin is identified within the top tier of the settlement hierarchy in accordance with the Regional Planning Guidelines in order to promote the consolidation and sustainable intensification of the existing urban/built form thereby maximising efficiencies from establishing physical and social infrastructure.
The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:	
Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:	It is considered that the lands at Ballycullen - Oldcourt are essential to allow for growth and expansion of South Dublin in order to meet the targets as set out in the RPGs.
Comprises significant previously developed and/or under-utilised lands:	The subject lands consist of significant underutilised land suitable for a residential type development, proximate to the existing services.
Is within or adjoining the core of an established or designated urban settlement:	The lands at Ballycullen-Oldcourt fall within the Metropolitan Consolidation Area of the Dublin Gateway.
Will be essential in achieving compact and sustainable urban growth; and,	The future development of these lands will be in accordance with the approved Ballycullen – Oldcourt 2014 prepared in accordance with Ministerial guidance documents. The implementation of the LAP is essential in achieving compact and sustainable urban growth.
There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	There are no alternative unzoned lands available for significant development such as that envisaged at Ballycullen – Oldcourt with equivalent established infrastructure and services.
A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere. N.B. The acceptability or otherwise of levels of any residual risk should be made with consideration for the proposed development and the local context and should be described in the relevant flood risk assessment.	

A SFRA has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process. The OPW Preliminary Flood Risk Assessment (PFRA) identified flood risk on a portion of the overall lands within the Ballycullen - Oldcourt LAP boundary. The RES-N lands within flood risk zones are undeveloped. The Ballycullen - Oldcourt Local Area Plan 2014 was prepared having regard to the best available flood data and consideration of the land use strategy in the LAP included for the flood risk and promotes a sequential approach to land uses in the Plan.

Lands at Aungierstown & Ballybane

The subject lands are zoned 'EP2' in the 2010 – 2016 Development Plan and as such, are generally categorised as undeveloped, zoned lands at risk of flooding. The subject undeveloped lands at Aungierstown & Ballybane form a strategic employment landbank to the west of the County known as Grange Castle. Objective EE 'To provide for enterprise and employment related uses' is applied to circa 455 ha of land in the area. The zoning objective is indicatively categorised as accommodating less vulnerable land uses such as warehousing, commercial and industrial. The provision of these uses is generally appropriate in Flood Zone B but requires a Justification Test in Flood Zone A. Approximately 3% of the overall EE lands at this location have been identified to be at risk of flooding within Flood Zone A. The area impacted by Flood Zone A is linear in nature and runs adjacent to the Griffeen Stream. To determine the appropriateness of the zoning at Grange Castle, the sequential approach has been applied, which has culminated in application of the Justification Test.

The Core Strategy Guidance Notes, DECLG (2010) state that the Core Strategy should incorporate 'an appropriate level of analysis to ensure that sufficient lands are identified for employment purposes at suitable locations, taking account of National planning policies...and the availability of the required physical infrastructure'. (pg. 8) South Dublin is an integral part of the Dublin City Region, a city region of international scale. There is a flow of employees across the various counties of the GDA and industries tend to cluster based on geographic characteristics, with Dublin City Centre serving as the commercial core and accommodating higher order commercial activities and edge of city locations accommodating larger scale enterprises. In South Dublin economic activity is focused into employment lands that are proximate to key centres of population and into the main urban centres. The subject lands form a key element of the Economic Strategy for the County which seeks to ensure that there is a sufficient supply of zoned and serviced lands at suitable locations to accommodate future demand for enterprise and employment investment across a diverse range of sectors. The strategy also seeks to strengthen the alignment between employment, population and transport services.

The proposed lands are situated in a strategic location within a Metropolitan Consolidation Town, adjoining existing employment uses and provide high quality road access. There are no other suitable lands available for the development of strategic employment at locations which are not at risk of flooding.

Table: Justification Test for EP2 zoned lands at Aungierstown & Ballybane

Criteria	Response
The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.	<p>The National Spatial Strategy 2002-2022 is a twenty year plan for the Country and consolidating the Greater Dublin Area, a Gateway, is a primary policy of this Strategy.</p> <p>The NSS favours the physical consolidation of Dublin's Metropolitan Area as an essential requirement for a competitive Dublin. It seeks to sustain Dublin's role as the engine of the national economy and seeks to bring people, employment and services closer together to create a better quality of life, less congestion, reduced commuting distances, more regard to the quality of the environment and increased access to services like health, education and leisure</p>

	Grange Castle is a key strategic location for enterprise and employment within the Metropolitan Area of Dublin. The subject lands enable an extension of the business park.
The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:	
Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:	It is considered that the lands at Grange Castle are essential to allow for growth and expansion of South Dublin.
Comprises significant previously developed and/or under-utilised lands:	The subject lands consist of underutilised land suitable for business park development, proximate to existing services and within the Metropolitan Area.
Is within or adjoining the core of an established or designated urban settlement:	The subject lands are within the Metropolitan Area of the Greater Dublin Area.
Will be essential in achieving compact and sustainable urban growth; and,	The subject lands are essential in the economic growth of the County and achieving sustainable urban growth.
There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	There are no alternative more suitable strategic lands identified within the County.
A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.	
A SFRA has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process. The identified flood risk A on the lands represents a small proportion of the overall lands and the extent of the flood risk lands are linear and clustered in nature. Having regard to the nature of development in the area and the quantum of water compatible uses associated with predominant EE uses, it is considered that the application of the sequential approach at site design and development management stage can adequately manage development subject to an appropriately detailed flood risk assessment in support of any planning application. The level of detail will vary depending on the risks identified and the proposed land use.	

Clonburris

The subject lands are delineated as 'SDZ' in the 2010 – 2016 Development Plan and as such, are generally categorised as undeveloped, zoned lands at risk of flooding. Clonburris is a strategic growth area within the Metropolitan Consolidation Town of Clondalkin as identified under the Regional Planning Guidelines. Objective SDZ 'to provide for strategic development in accordance with approved planning schemes' is applied to 180 ha of land in the area. The SFRA indicative pluvial mapping shows cluster of flood risk in the area. The SFRA shows no current fluvial flood risk within the area. To determine the appropriateness of the SDZ zoning at Clonburris, the sequential approach has been applied, which has culminated in application of the Justification Test.

The Planning and Development Act, 2000 (as amended) introduced Strategic Development Zones (SDZs). Where, in the opinion of the Government, specified development is of economic or social importance to the State, the Government may by order designate sites for the establishment of a Strategic

Development Zone (SDZ) to facilitate such development. A Planning Scheme must be prepared for the SDZ to indicate the extent and type of development that will take place and proposals relating to supporting infrastructure and facilities. Development within a SDZ must be consistent with the relevant Planning Scheme.

The Government designated 180 hectares of land at Clonburris as a Strategic Development Zone in 2006. The Planning Scheme forms part of the County Development Plan for the area and any contrary provisions of the Development Plan

are superseded by the Planning Scheme. Clonburris represents a major expansion of the footprint of Clondalkin along the Dublin-Cork rail corridor and development in Clonburris will be subject to an approved SDZ Planning Scheme.

It is a requirement under the Planning and Development Act 2000 (as amended) for the County Development Plan including its Core Strategy to be consistent with the Regional Planning Guidelines for the Greater Dublin Area 2010 – 2022 and to ensure that there are sufficient and suitable lands zoned to meet the population and housing requirements for the County. The Core Strategy in the Draft Plan identifies a growth in population of over 26,300 people and a need for over 32,000 dwellings during the lifetimes of the County Development Plan and it is a requirement to ensure that enough lands are zoned for such need and in appropriate places. The Clonburris SDZ Planning Scheme 2008, sets out a planning framework to support the delivery of 11,505 dwelling units and supporting infrastructure and facilities.

As such, it is considered that there are no alternative unzoned lands available for significant development such as that envisaged at Clonburris with equivalent infrastructure and services. The preparation of a revised SDZ Planning Scheme and/or LAP for Clonburris should be cognisant of the pluvial flood risk and the recommendations and guidelines from the GDSDS should be implemented in the area to reduce the risk of pluvial flooding.

Table: Justification Test for SDZ lands at Clonburris

Criteria	Response
The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.	The National Spatial Strategy 2002-2022 is a twenty year plan for the Country and consolidating the Greater Dublin Area, a Gateway, is a primary policy of this Strategy. Clonburris forms part of the Metropolitan Consolidation Town of Clondalkin within the settlement hierarchy of the Regional Planning Guidelines.
The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:	
Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:	It is considered that the lands at Clonburris are essential to allow for growth and expansion of South Dublin in order to meet the targets as set out in the RPGs.
Comprises significant previously developed and/or under-utilised lands:	The subject lands consist of significant underutilised land suitable for a residential and mixed use type development, proximate to the existing services.
Is within or adjoining the core of an established or designated urban settlement:	The lands at Clonburris are a designated urban settlement and form part of the Metropolitan Consolidation Town of Clondalkin.
Will be essential in achieving compact and sustainable urban growth; and,	The future development of these lands is essential in achieving compact and sustainable urban growth.
There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	There are no alternative unzoned lands available for significant development such as that envisaged at Clonburris with equivalent established infrastructure and services.
A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere. N.B. The acceptability or otherwise of levels of any residual risk should be made with consideration for the proposed development and the local context and should be described in the relevant flood risk assessment.	
A SFRA has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process.	

Any revised SDZ Planning Scheme or LAP should be cognisant of the flood risk, in particular, the recommendations and guidelines from the GDSDS should be implemented in the area to reduce the risk of pluvial flooding. GDSDS and SuDs practices should be implemented in the SDZ.

Lands Adamstown South, south of R120 and north of Grand Canal (Beattie's Field)

The subject lands are zoned for Rural Amenity in the 2010 – 2016 Development Plan and are zoned as 'RES-N' under the Draft Plan. Beattie's Field is identified as an extension to the strategic growth area of Clonburris within the Metropolitan Consolidation Town of Clondalkin as identified under the Regional Planning Guidelines. Objective RES-N 'to provide for new residential communities in accordance with approved area plans' is applied to 16.75 ha of land in the area. A small section of the lands adjacent to the banks of the Griffeen River are identified as Flood Zone A and part of the overall zoned lands in the north east sector as a Flood Zone B. Flood Zone B accounts for 2.81 ha of the zoned lands, representing 16.75% of the overall lands. Flood Zone A accounts for a minor element of the site adjoining the river bank. To determine the appropriateness of the RES-N zoning at Beattie's Field, the sequential approach has been applied, which has culminated in application of the Justification Test.

It is a requirement under the Planning and Development Act 2000 (as amended) for the County Development Plan including its Core Strategy to be consistent with the Regional Planning Guidelines for the Greater Dublin Area 2010 – 2022 and to ensure that there are sufficient and suitable lands zoned to meet the population and housing requirements for the County. The Core Strategy in the Draft Plan identifies a growth in population of over 26,300 people and a need for over 32,000 dwellings during the lifetimes of the County Development Plan and it is a requirement to ensure that enough lands are zoned for such need and in appropriate places.

In the context of the RES-N zoning, it is noteworthy that a range of both highly vulnerable and less vulnerable land uses are 'permitted in principle' and that development shall be in accordance with an approved plan.

Having regard to:

- a) the percentage of the overall lands identified as flood risk,
- b) the range of both highly vulnerable and less vulnerable land uses 'permitted in principle' in the RES-N zone,
- c) the requirement of Objective C12 SLO 1 to provide a full size playing pitch,
- d) the requirement for a minimum of 14% public open space as part of a residential development,
- e) the requirement of a setback of development from the Griffeen River and
- f) the requirement for development on RES-N to be in accordance with an approved area plan, it is considered that the future development of the zoned land should be subject to a Flood Risk Assessment (FRA) in preparation of the approved plan, the application of the sequential approach in the land use strategy of the approved plan and appropriate assessment at planning application stage.

As such, it is considered that there are no alternative unzoned lands available for development such as that envisaged at Beattie's Field with equivalent proximity to developing areas, infrastructure and services. The preparation of a revised SDZ Planning Scheme and/or LAP for the area should be cognisant of the flood risk.

Table: Justification Test for RES-N zoned lands at Beattie's Field

Criteria	Response
The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.	<p>The National Spatial Strategy 2002-2022 is a twenty year plan for the Country and consolidating the Greater Dublin Area, a Gateway, is a primary policy of this Strategy.</p> <p>The subject lands and Clonburris form part of the Metropolitan Consolidation Town of Clondalkin within the settlement hierarchy of the Regional Planning Guidelines.</p>

The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:	
Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:	It is considered that the lands and Clonburris are essential to allow for growth and expansion of South Dublin in order to meet the targets as set out in the RPGs.
Comprises significant previously developed and/or under-utilised lands:	The subject lands consist of significant underutilised land suitable for a residential and mixed use type development, proximate to the existing services.
Is within or adjoining the core of an established or designated urban settlement:	The lands and Clonburris are a designated urban settlement and form part of the Metropolitan Consolidation Town of Clondalkin.
Will be essential in achieving compact and sustainable urban growth; and,	The future development of these lands is essential in achieving compact and sustainable urban growth.
There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	There are no alternative unzoned lands available for significant development with equivalent proximity to developing areas, infrastructure and services.
<p>A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.</p> <p>N.B. The acceptability or otherwise of levels of any residual risk should be made with consideration for the proposed development and the local context and should be described in the relevant flood risk assessment.</p>	
<p>A SFRA has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process.</p> <p>The preparation of a revised SDZ Planning Scheme and/or LAP for the wider area should be cognisant of the flood risk. The future development of the zoned land should be subject to a Flood Risk Assessment (FRA) in preparation of the approved plan, the application of the sequential approach in the land use strategy of the approved plan and appropriate flood risk assessment at planning application stage.</p>	

The foregoing spatial planning rationale and overlaying maps demonstrating the process will be incorporated into the SFRA review.

Recommendation

Amend the initial SFRA to inform the preparation of the Draft Plan in conjunction with the consultants to produce a finalised Strategic Flood Risk Assessment (SFRA).

Spelling Error & Title Issue

Submission received from the Department of Environment, Community and Local Government notes that Table 11.21 (pg.194) details Minimum Space Standards for Apartment developments and reflects the Sustainable Urban Housing: Design Standards for New Apartments Guidelines (2007) includes a typographical error in column 2 of the table which is titled 'House' in lieu of 'Apartment'.

Chief Executive's Response and Recommendation

The contents of the submission from the DECLG with regard to Table 11.21 of the Draft Plan regarding Minimum Space Standards for Apartments was noted; amendment to the Draft Plan to correct same is recommended.

Recommendation:

It is recommended that Table 11.21 of the Draft County Development Plan regarding Minimum Space Standards for Apartments be amended to state 'Apartments' in lieu of 'Houses' in the second column of the table.

0.5.1.2 Submission of the Eastern and Midland Regional Assembly ([DRAFTDEVPLAN0500](#))

1.4.0 Core Strategy

In the submission of the Eastern and Midland Regional Assembly it is noted that the core strategy is proposing a new "moderate sustainable growth town" designation for Saggart/Citywest. It is acknowledged that this reflects the level of existing services in the area, infrastructural capacity for further residential and commercial development and the significant growth that has taken place in the last decade as reflected in the Fortunestown LAP. It is advised that the settlement hierarchy should be cognisant of the hierarchy prescribed in the Regional Planning Guidelines for South Dublin.

Chief Executive's Response and Recommendation

The Core Strategy settlement hierarchy contained in the Draft Plan 2016-2022 is based on the settlement hierarchy identified under the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 and has been advanced to align with the settlement typologies identified and defined under the Regional Planning Guidelines including those that relate to Small Towns and Moderate Sustainable Growth Towns.

Saggart-Citywest has recently emerged as a settlement with a high level servicing function that is consistent with the characteristics of a Moderate Sustainable Growth Town as defined by the Guidelines. The population of Saggart-Citywest has also increased significantly in the last decade and exceeds the threshold identified for a Small Town.

The proposed designation as a Moderate Sustainable Growth Town acknowledges the range of local services that have developed within the settlement area since the adoption of the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 including high quality public transport connections with Dublin City Centre and Tallaght (Luas Red Line), which support existing high level employment (Citywest Business Park and Hotel) and retail (Saggart Village and Citywest Shopping Centre) functions.

Taken in conjunction with the extent of economic activity, the quality of public transport provision and the designation of Citywest Shopping Centre as a Level 3 Retail Centre in the Retail Strategy for the Greater Dublin Area 2008-2016, it is considered that a Moderate Sustainable Growth Town designation appropriately reflects the settlement's capacity to provide for further sustainable housing growth that is linked to economic expansion, retail offer and public transport accessibility.

The emergence of Saggart-Citywest as a relatively self-sufficient settlement is evident from Census 2011 POWSCAR data, which reveals major employment growth in Citywest with a relatively high jobs yield of 33 jobs/ha. Data on trips to work reveals that Citywest achieved some of the highest level of trips by foot in the County (9-12%) and that, as an employment centre, Citywest benefits from having the highest concentrations of employees in the County from within the same or adjoining ED i.e. the largest number of trips to the ED for Citywest are from within the same ED and immediately adjoining EDs.

Neither the submission of the Regional Assembly or DECLG take issue with the principle or rationale for the proposed designation of Saggart/Citywest as a "Moderate Sustainable Growth Town". It is considered that at this stage of the Development Plan preparation process, the planning rationale for the designation, should take precedence over concerns in relation to the timing of the designation particularly in the context of the impending review of the Regional Planning Guidelines.

Recommendation: It is not recommended that the Draft County Development Plan be amended.

4.3.0 Employment Location Categories

The Eastern and Midland Regional Assembly (EMRA) notes the quantum of land zoned for enterprise and employment. It is advised that Chapter 4 would benefit from a more analytical approach to the complex issues of designating such lands as suggested at pre-draft submission stage. Such an approach could consider the wide typology, nature of employment and jobs ratio in the County and in relation to the other Dublin Local Authorities. It could also provide for a methodology to link the quantum of zoned lands to floorspace, density of employment and projected job numbers. This would provide an evidence based approach as required in a core strategy.

Chief Executive's Response and Recommendation

The Economic Strategy for South Dublin County seeks to ensure that there is a sufficient supply of zoned and serviced lands at suitable locations to accommodate future demand for enterprise and employment investment across a diverse range of sectors. The strategy also seeks to strengthen the alignment between employment, population and transport services. Whilst a range of employment uses are permitted in principle or open for consideration across a range of land-use zonings, the County Development Plan seeks to guide enterprise and employment development to appropriate locations by identifying economic clusters and setting out policies and objectives for the future development of these areas. Of the total hectares of land zoned for enterprise and employment related uses in the County, 324 hectares remain undeveloped and available for future economic growth, with 250 hectares of brownfield land zoned for more intensive enterprise and/or residential led development.

The South Dublin Spatial Energy Demand Analysis (SEDA), prepared by South Dublin County Council and South Dublin Chamber of Commerce (2014), analysed the employment profile and sector breakdown of South Dublin County for 2014, and projected job numbers for each sector for the period 2015-2022 based on the South Dublin County economic profile. Having regard to lands available subject to EE and REGEN zoning objectives, the extent of realistic development potential of said lands during the 2016-2022 Draft Plan period, comparable jobs yield per hectare in the County, and resultant density of jobs per hectare, it is considered that the quantum of lands zoned for enterprise and employment uses are reasonable and appropriate to meet the employment needs for the County at this time.

Recommendation: It is not recommended that the Draft County Development Plan be amended.

5.2.0 Retailing - Clondalkin

The submission of the EMRA advises that the Retail Strategy for the Greater Dublin Area (2008) is the relevant retail policy document in relation to the retail hierarchy in the County. It is recommended that the role of Clondalkin would benefit from some clarity. It is recognised that Clondalkin has a broad range of high level retailing amongst other services and that this is expressed in its town centre zoning objective, however, the retail hierarchy policy should reflect the Regional Planning Guidelines and state that the retail element of Clondalkin is at District Level 3 scale. A similar statement to that included in the 2010 Development Plan in relation to the retail and town centre functions of Clondalkin would provide clarity on its unique position.

Chief Executive's Response and Recommendation

The Chief Executive acknowledges the EMRA recommendation that the role of Clondalkin, in terms of retail and urban hierarchy status, would benefit from clarification in the Draft Plan 2016-2022. Section 5.1.0 Urban Centres and Section 5.2.0 Retailing (in particular 5.6.3 Clondalkin) of the Draft Plan independently provide policies and objectives for the urban centre and retailing role of Clondalkin.

In recognition of the importance and diversity of Clondalkin, the Draft Plan designates Clondalkin as a Town Centre in the Urban Centre Hierarchy with a complimentary 'Town Centre' zoning. Section 5.1.0 of the Draft Plan refers.

In terms of retail, Clondalkin is designated as a Level 3 Retail Centre in the Retail Strategy for the GDA and the Draft Plan retail hierarchy. Section 5.6.3 of the Draft Plan outlines the retail policy for Clondalkin and states that it is the policy of the Council to maintain and enhance the Level 3 retailing function of Clondalkin Town Centre.

Having regard to the content of the submission, it is considered that an additional paragraph shall be added to Section 5.6.3 Clondalkin to cross reference the reader to the Urban Hierarchy section and clarify the retail and urban function status of Clondalkin.

Recommendation

It is recommended that the Draft County Development Plan be amended to include a paragraph in Section 5.6.3 Clondalkin to cross reference the reader to the Urban Hierarchy section and clarify the retail and urban function status of Clondalkin.

5.2.0 Retailing – Firhouse, Knocklyon and Palmerstown

The submission of the EMRA notes that established centres of Firhouse, Knocklyon and Palmerstown have had their zoning objectives changed from local centre to district centre to reflect their level of activity and catchments. While they may have a more established nature and role, the retail function of these centres should not be increased to allow for additional floorspace.

Chief Executive's Response and Recommendation

The Chief Executive has considered the contents of the submission in relation to the designation of Firhouse, Palmerstown & Knocklyon to Level 3 in the South Dublin County Retail Hierarchy.

In Part 6 of the Retail Strategy for the GDA, the following guidance is provided on what constitutes a District Centre: District centres vary both in terms of the scale of provision and the size of catchment, due to proximity to a major town centre. Where the centre is close to existing major centres, the scale of retail and mixed provision is lower, with the centre range of shops meeting more basic day to day needs and only small scale range of comparison units trading. Such centres would generally cater for a population of 10,000- 40,000.

The Retail Planning Guidelines 2012 define a District Centre as follows: 'Provides a range of retail and non-retail service functions (e.g. banks, post office, local offices, restaurants, public houses, community and cultural facilities) for the community at a level consistent with the function of that centre in the core strategy. They can be purpose built as in new or expanding suburbs or traditional district centres in large cities or towns'.

The centres at Palmerstown, Firhouse and Knocklyon are located in a suburban environment, geographically located between village and town centres with substantial catchment within walking distance. The level of activity, range of uses and population catchment aligns with that of a District Centre in the context of the Retail Strategy for the GDA. It has consistently been Council policy to develop the County's District Centres as multi-faceted, mixed-use, higher density urban centres including residential, commercial, recreational, community and retail uses. As such, the application of a District Centre zoning reflects the variety of uses at these locations, which include retail. The Chief Executive acknowledges the concerns in relation the retail function of these centres and the potential to adversely affect the promotion of retail development in the county in a strategic and structured manner. In this context, the retail status of the centres is recommended to be reverted back to a Retail Level 4 status in line with the Retail Strategy for the GDA 2008-2016. However, in terms of the Urban Hierarchy, the District Centre zoning with accompanying policy context set out in Section 5.1.0 shall apply to the centres.

In summary, similar to Clondalkin, the urban and retail role of the centres shall be separated in policy terms and it is recommended that the retail status of Firhouse, Palmerstown and Knocklyon be reverted to a Level 4 in Section 5.2.2 to align with the Retail Strategy for the GDA but the District Centre (DC) zoning be retained to reflect the status of the centres in the communities and provide an appropriate policy context.

Recommendation: Retail status of Firhouse, Palmerstown and Knocklyon be reverted to Level 4 in Section 5.2.2

Retain the District Centre zoning for the centres and amend Section 5.6.2 and the land use zoning matrix accordingly to differentiate between Level 3 and Level 4 District centres.

Chapter 7 – Infrastructure and Environmental Quality - General

The submission from the Eastern and Midland Regional Assembly advises that resilience is a principle that could be considered in the Development Plan, as a concept it can be described as 'the ability of a system, community or society exposed to hazards to resist, absorb, accommodate to and recover from the effects of a hazard in a timely and efficient manner, including through the preservation and restoration of its essential basic structures and functions'.

This principle can be broken down and applied for critical infrastructure such as transport networks, utilities, public places and more recently IT and supply systems. The submission outlines that the Assembly is commencing a 3 year project to prepare a European Resilience Management Guidelines to support the practical application of resilience.

Chief Executive's Response and Recommendation

The submission from the Regional Assembly in relation to considering the principle of resilience in the Draft Plan is noted. The National Climate Change Adaptation Framework – Building Resilience to Climate Change was published by the Department of the Environment, Community & Local Government in 2012. Local authorities are obliged to prepare Local Adaptation Plans in consultation with all relevant internal and external stakeholders. South Dublin County Council is committed to preparing a Local Adaptation Plan, which will inform policy making at a local level in the future.

The County Development Plan seeks to promote a series of policies and objectives throughout that will ameliorate the effects of climate change and introduce resilience to its effects to support the implementation of the National Climate Change Strategy 2007-2012, DEHLG (2007) and the National Climate Change Adaptation Framework Building Resilience to Climate Change, DECLG (2012).

The Core Strategy outlines that it is policy of the Council to support the implementation of the National Climate Change Strategy and the National Climate Change Adaptation Framework Building Resilience to Climate Change 2012 through the County Development Plan and through the preparation of a Climate Change Adaptation Plan in conjunction with all relevant stakeholders.

It is noted that the submission outlines that the Assembly is commencing a 3 year project to prepare European Resilience Management Guidelines to support the practical application of resilience. The Draft Plan shall be amended to support and implement same.

Recommendation

Amend the Draft Plan to include reference to the emerging European Resilience Management Guidelines being prepared by the Regional Assembly.

7.3.0 Flood Risk Management

The submission of the Eastern and Midland Regional Assembly notes that the report on flood risk in the Baldonnell Area identifies Flood Risk A and B areas within the 'EE' zoning objective at this location and that IE3 SLO 1 sets out to require the preparation of flood risk assessment to be submitted with any proposal for development on the lands. It is advised that, in accordance with the Planning and Flood Risk Assessment Guidelines, a justification test for the lands should take place at this stage of the development plan process in the assessment of Development Plan zonings. It is therefore advised that the zoning objective of the lands in Baldonnell is inappropriate in a flood risk area and should be reconsidered.

Chief Executive's Response and Recommendation

The Chief Executive acknowledges the submissions and the concerns raised in relation to the 'EE' zoning of lands at Baldonnell. The Chief Executive agrees with the submissions to reconsider the zoning of these lands and recommends a Rural (RU) zoning.

As part of the County Development Plan and SEA process 2016-2022, an initial Strategic Flood Risk Assessment (SFRA) to inform the Draft Plan was carried out for the County, with a further report on Flood Risk Assessment also carried out subsequently due to the lands located at Moneenalion Commons being identified in the County study as having a potential risk. Additionally, the Eastern CFRAM study mapping identifies the area as having a potential risk. The foregoing provides an evidence base on flood risk in the County. The studies identify a significant portion of the site in question as being in flood risk zone A, with 'a high probability of flooding'.

The Guidelines for Planning Authorities on Flood Risk Management (2009) advises in relation to Flood Zone A that 'most types of development would be considered inappropriate in this zone' and that 'development in this zone should be avoided and/or considered only in exceptional circumstances'.

These 'exceptional circumstances' require all parts of a Development Plan justification test to be met 'on a solid evidence basis'. It is considered that on the basis of the information currently available to the Planning Authority, this cannot be met in respect of the subject lands i.e. this is because the Planning Authority is not satisfied that 'it can be demonstrated on a solid evidence base that the zoning or designation for development will satisfy the justification test.'

The DECLG Planning Policy Statement 2015, reiterates the Key Principles that should be used as a strategic guide to implementing proper planning and sustainable development of urban and rural areas and state that planning must be plan-led and evidence based. This follows on from the 2010 Planning Act, which requires an evidence based 'core strategy' as the basis for all County Development Plans.

The Chief Executive recommends that the subject lands at Baldonnell be zoned for Rural 'RU'. This recommendation is based on evidence and information detailed in specifically commissioned reports prepared by independent consultants for the County Development Plan and the OPW produced Eastern CFRAM, as stated above.

Section 4 of the Flood Risk Guidelines relates specifically to "existing, undeveloped, zoned areas at risk of flooding" and Sections 4.26 & 4.27 state that "future flood risk assessments required to support the development plan process may highlight existing, undeveloped areas which, on their own merits, were zoned for development in previous development plans but which new information indicates may now, or in the future, be at risk of flooding". The Flood Risk Guidelines advise that "planning authorities should reconsider the zoning objective" and following this reconsideration, "may decide to:

- Remove the existing zoning for all types of development;
- Reduce the zoned area and change or add zoning categories to reflect flood risk;

- Replace the existing zoning with a zoning or specific objective for less vulnerable uses;
- Prepare a local area plan informed by a detailed flood risk assessment to address zoning and development issues in more detail; and/or
- Specify in exceptional circumstances and where all of the criteria of the justification test have been met, details of...flood risk management measures as pre-requisites to development...”

Given the extent and location of flood risk zone A on the lands in question, it is considered that removal of the existing employment zoning where the lands remain undeveloped is the most appropriate course of action, in line with the 'precautionary approach', which requires planning authorities to consider possible future changes in flood risk including the effects of climate change, "so that future occupants are not subject to unacceptable risks". In effect this means not giving the benefit of the doubt where risk has been identified. It also means that a site-specific solution does not appear to be an option when the risk relates to the catchment as a whole.

It is of concern that the SLO included in the Draft Plan is based on a presumption in favour of development with a Flood Risk Mitigation Strategy to be carried out by an applicant as part of any development proposals on the site may result in works being required that are outside of an applicant's control. In effect, this would be likely to shift the burden of responsibility and associated cost onto the local authority.

Recommendation

Amend the Draft Plan maps to rezone the lands at Moneenalion Commons from EE in the Draft Plan to Rural (RU) and delete the associated SLO text from the written statement.

0.5.1.3 Submission of the National Transport Authority ([DRAFTDEVPLAN0209](#))

Current and Proposed Plans, Projects and Designations

It is recommended by the NTA that further policy be inserted that requires LAPs or Masterplans for 'REGEN' zoned lands to include for road network reviews to reflect changing nature of uses from industrial to residential.

Chief Executive's Response and Recommendation

Section 1.9.0 of the Draft Plan 2016-2022 specifically addresses the preparation of Local Areas Plans, Approved Plans and Studies, with LAPs also referenced in policies and objectives under a number of relevant sections in the Draft Plan.

It is also noted that it is not appropriate for the County Development Plan to prescribe the contents or methodology of preparing an LAP or Masterplan prior to appropriate scoping. The Council will continue in its programme of preparing Local Area Plans and other plans and studies as appropriate, giving priority to areas that are likely to experience significant growth or regeneration, as stated under CS Policy 6 of the Draft Plan.

The preparation of LAPs will be carried out accordance with the 'Local Area Plans Guidelines for Planning Authorities' (2013) and in accordance with the statutory process prescribed in the Act.

Recommendation: It is not recommended that the Draft County Development Plan be amended.

4.5.0 Tourism and Leisure

NTA requests that ET Policy 6 be amended to acknowledge their role as funding agency for Greenway element of GDA Cycle Network.

Chief Executive's Response and Recommendation

The contents of the submission from the NTA with regard to ET Policy 6 have been considered and noted. In this regard it is recommended that the NTA be included in the list of funding agencies in the Action relating to ET Policy 6 of the Draft Plan.

Recommendation: It is recommended that Section 4.5.0, ET Policy 6 of the Draft County Development Plan be amended to include the NTA in the list of funding agencies in the Action relating to ET Policy 6.

6.0 Introduction

NTA requests that their statutory role in long terms strategic transport planning in the GDA be highlighted.

Chief Executive's Response and Recommendation

It is accepted that the Draft Plan should be modified to acknowledge the NTA's role in the provision of public transport services.

Recommendation: That Section 6.2.0 Public Transport of the Draft Plan be modified to acknowledge the NTAs role in the provision of public transport services.

6.3.0 Walking and Cycling

NTA recommends that objectives contained in Section 6.3 be amended to make reference to the GDA Cycle Network Plan and 'Permeability: A Best Practice Guide'. It is also recommended that an objective be inserted that requires study into addressing permeability and access to Luas stops.

Include reference to National Cycle Manual under TM Policy 6.

Chief Executive's Response and Recommendation

As noted in Section 6.0 – Introduction of the Draft Plan 2016-2022, the transport and mobility policy in South Dublin is guided by a 'comprehensive and coordinated set of national and regional policy documents'. An exhaustive list of all relevant national and regional plans is not provided

A more focused approach has been taken that links the implementation of a Policy or Policy Objective with more detailed guidelines which are to be used as implementation tools or provide standards for assessment. Such references are provided where they are directly linked to the implementation of a Policy or set of Policy Objectives as an Action. For example:

Section 6.3.0 - Walking and Cycling make reference to the Greater Dublin Area Strategic Cycle Network and links its implementation to the objectives of the plan.

TM3 Objective 1 states: "To create a comprehensive and legible County-wide network of cycling and walking routes that link communities to key destinations, amenities and leisure activities."

There are several overarching national policy documents such as Smarter Travel, the National Cycle Policy Framework and the Urban Design Manual which have informed this objective. In terms of its implementation, the Actions listed under this policy make reference to documents with more detailed guidelines, including:

- 'Work with the NTA to assist and secure funding for the ongoing implementation of the County Strategic Cycle Network (see also Section 6.3.1 - County Strategic Cycle Network)'
- 'Reduce walking and cycling distances to areas of employment, community services, schools, shops, public transport and other community facilities through the delivery of Local Permeability Improvements within existing communities (see also Section 6.3.2 – Local Permeability Improvements)'.

This ensures that that in integrity of the Policies and Policy Objectives within the Draft Plan are maintained, should any of the associated NTA plans be withdrawn or superseded.

Recommendation

It is not recommended that the Draft County Development Plan be amended.

6.4.0 Road and Street Network

NTA has concerns in relation to the following road proposals by reason of negative impacts on public transport, adverse impacts on operational capacity of national roads and contravention of national policy to protect investment in the national road network:

- Esker Lane/N4 junction reopening
- Junction 8 M50
- Oak Road Extension
- Tandy's Lane/N4 junction reopening
- Tay Lane / N7 junction reopening
- Kennelsfort Road/R148 upgrade separation.

Chief Executive's Response and Recommendation

It is noted that the Trans-European Transport Networks (TEN-T) Regulations have major implication for future access to the N4 and N7. The Regulations require the upgrade of the N7 to motorway or 'express road' standards between the M50 and Naas by 2030. The N4 is also considered part of the TEN-T comprehensive network.

Further to the submission of the NTA, Transport Infrastructure Ireland (TII) have advised that the inclusion of a number of junction proposals contained within Table 6.5 Six Year Road Programme and Table 6.6 Medium to Long Term Road Objectives will compromise the requirements of TEN-T, including:

- Esker Lane/N4 - Junction re-opening and upgrade.

- Junction 8 (M50)
- Tandy's Lane/N4 - Junction re-opening and upgrade.
- Tay Lane/N7 Junction - Junction re-opening and upgrade.

It is accepted that access to the N4 and N7 will require the consent of the TII to be carried out. The support of the NTA and Department of Transport, Tourism and Sport (DTTS) would also be crucial, particularly if funding from a national agency was sought. It is noted that all three national agencies have objected to the proposals and the likelihood of them proceeding is improbable. There is a concern that including such proposals within the Plan may unduly raise community expectations and reduce its credibility.

Furthermore, it is also noted that the management of the M50 is the remit of TII. The Draft Transport Strategy for the Greater Dublin Area 2016-2035 notes that 'traffic levels on the M50 have continued to grow, even during the economic downturn, and delays on this corridor are now a common feature, despite a near-doubling of its capacity in recent years'. The Transport Strategy also states that 'other than on the southern section of the route, further capacity enhancements to the M50 are neither physically possible nor environmentally desirable'

Further details in regard to demand management (and management of the M50 more generally) are also detailed in the NRA published M50 Demand Management Report (2014), which should be further referenced in the Draft Plan 2016-2022 under (TM) Policy 5 Traffic and Transport Management.

As noted above and further to the submission of the NTA, TII have also advised that the proposed Junction 8 contained within Table 6.6 Medium to Long Term Road Objectives will compromise the requirements of TEN-T. This junction was formally linked to the M7 project which has since been abandoned.

It is also noted that concerns have been raised by the NTA in regard to the proposed Kennelsfort/N4 junction stating that it may be that the proposed upgrade would not be in accordance with established policy. Section 5.8.3 - Principles of Road Development of the Draft Transport Strategy for the Greater Dublin Region states that: 'That there will be no significant increase in road capacity for private vehicles on radial roads inside the M50 motorway'

It is accepted that this has been a long standing approach from the NTA, as further noted in Section 3.2.6 Road Network of the Draft Transport Strategy: 'Since the mid-1990s, transport policy in the GDA has been directed towards reducing the growth in car travel and increasing the use of public transport, cycling and walking. Complementing this approach has been a policy of not increasing road capacity for private cars on radial roads inside the M50. The basis for these policies is recognition that it is unrealistic and unsustainable to accommodate growth in travel demand across the region through car based movement'

Notwithstanding the above Section 5.8.2 Regional and Local Roads of the Draft Transport Strategy states: 'Address localised traffic delay locations, including on radial routes inside the M50 C-Ring, in cases where the primary reason for intervention is to address safety or public transport issues at such locations'

It is accepted that the provision of a segregated junction, or flyover, at this location is a substantial financial commitment. A project of this scale could not be funded by SDCC alone and the support of the NTA would also be crucial should funding from a national agency be sought. As such a strong case for such funding would need to be made, supported by a feasibility study and strong cost/benefit analysis that shows a substantial improvement in the level of service afforded to sustainable users, whilst not increasing the capacity of the street network for private cars. It is not recommended that any changes be made to the Draft Plan in this regard.

It is also noted that concerns have also been raised by the NTA in regard to the proposed Oak Road Extension which would intersect with the N7. The NTA has not requested its removal however it is noted that any scheme would have to demonstrate that it would not affect the capacity of the road or adversely impact the movement of buses and trams along the route. It is not recommended that any changes be made to the Draft Plan in this regard.

Recommendation:

That the following proposals for the following junctions be removed from Table 6.5 Six Year Road Programme and Table 6.6: Medium to Long Term Road Objectives:

- Fonthill Road/N4
- Esker Lane/N4
- Tandy's Lane/N4
- Tay Lane/N7 Junction
- Junction 8 (M50)

11.4.0 Transport and Mobility – Bicycle and Car Parking

NTA recommends to remove distinction between long terms and short stay cycle parking for schools and that policy be inserted that requires applications of a certain scale to demonstrate the rationale for the application of maximum parking standards particularly for those in Zone 2 given that these standards should not be viewed as a target.

NTA recommends that areas to which Zone 2 parking requirement apply be mapped.

Chief Executive's Response and Recommendation

In terms of bicycle parking, Table 11.22: Minimum Bicycle Parking Rates of the Draft Plan 2016-2022 requires the following for schools:

- Primary Schools, 1 per 5 staff (long term) and 1 per 5 students (short term)
- Post Primary Schools, 1 per 5 staff (long term) and 1 per 2 students (short term)

It is agreed that all parking for students should also be classified as long term so that it is provided within a secure facility.

In terms of maximum car parking standards, the approach taken within the Draft Plan seeks to provide a balanced approach that takes into account the need to promote greater use of sustainable modes whilst making provision for the number of spaces that are reasonably needed to service a development. TM Policy 7 Car Parking states: "It is the policy of Council to take a balanced approach to the provision of car parking with the aim of meeting the needs of businesses and communities whilst promoting a transition towards more sustainable forms of transportation".

It should be noted that Zone 2 has not been mapped as the zone is likely to continuously evolve as new services come on-line.

The rates applied to each land use where devised with regard to the Current Plan, NTA Guidelines and those rates applied within adjacent metropolitan local authorities (Dun Laoghaire Co. Co., Fingal Co. Co. and Dublin City Council). With regard to the later, this was also to ensure that the proposed rates were not anti-competitive.

All rates are applied as a maximum, however as noted within the Draft Plan, the maximum provision should not be viewed as a target and a lower rate of parking may be warranted subject to the range of services (and housing) available in the nearby by area.

It should be noted that where parking standards within the current Development Plan are also applied as a maximum rate in areas that are well served by public transport or alternative means of access. As such the approach proposed within the Draft Plan is not likely to differ significantly in practice from that of the current Development Plan.

It is therefore not recommended that the Draft County Development Plan be amended with regard to maximum parking rates.

Recommendation

That all bicycle parking requirements for schools be classified as long term.

11.4.0 Transport and Mobility – School Travel Plans

NTA recommends that an objective be inserted that requires all new schools and extended schools to monitor and implement school travel plans by way of condition.

Chief Executive's Response and Recommendation

One of the Actions listed under TM Policy 5 (Traffic and Transport Management) of the Draft Plan is to 'Require all major traffic generating development to submit a Mobility Management Plan/Workforce Plan and/or Traffic and Transport Assessment'

The requirements for these plans are outlined further in Section 11.4.6 of the Draft Plan. Table 11.25 of the outlines the thresholds for the submission of a Workplace Plan. It is agreed that all new schools (and major extensions to schools) should be required to submit a travel plan. The NTA has also produced a Toolkit for School Travel for further information on School Travel Plans.

Recommendation: That an additional requirements be added to Section 11.4.6 for the submission of a school travel plans for all new schools (and major extensions).

0.5.2 Summaries of All Submissions & Observations by Category

CHAPTER 1 - INTRODUCTION & CORE STRATEGY

General	
<p>1. Submitted that Plan should include a specific Strategic Framework section that outlines the following:</p> <ul style="list-style-type: none"> - The Planning and Development Act 2000(as amended) requires that a Development Plan shall, so far as is practicable, be consistent with National and Regional Plans, Policies and Strategies which relate to proper planning and development and is also required to have regard to Guidelines by the Minister for the Environment, Community and Local Government. - Submitted that Plan include list of mandatory development plan objectives as an appendix. - Submitted that Plan include sections for each of the NSS, RPGs, DoECLG Guidelines, Adjoining Counties stating that the plan has been drawn up consistent with each strategy. Based on the Planning & Development (Amendment Act) 2010. - Submitted that the Two year Review required by Sec 15(2) of the 2000 Planning Act be mentioned - Statement in accordance with Section 28 of the Planning and Development Act 2000 as to how the Plan has implemented or not implemented the policies and objectives of the Minister. - Include a separate statement which demonstrates that the development objectives in the Development Plan are consistent, as far practicable, with the protection and conservation of the environment in accordance with Sec 10(1D) of the Planning and Development Act 2000 (amended). <p>(DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p>	<p>Chief Executive's Response and Recommendation</p> <p>The statutory legislative requirements for County Development Plans in terms of compliance with national and regional strategies and ministerial guidelines including the requirement to carry out a two year review are already stated in Sections 1.1.0, 1.4.0 and 2.1.0 of the Draft Plan 2016-2022. It is a statutory requirement for a planning authority to have regard to the development plans of adjoining planning authorities under Planning and Development Legislation. The requirements of the legislation in respect of the inclusion of mandatory development plan objectives have been met. In the interest of avoiding repetition and unnecessarily adding to the volume of the written statement, it is not considered necessary to repeat this aspect of the plan making process.</p> <p>A Strategic Environmental Assessment (SEA) Report on the Draft Plan 2016-2022 was prepared as a separate statement in accordance with the requirements of Sec 10 (1D) of the Planning and Development Act 2000 (amended). The SEA report was included with all documentation placed on public display as part of the public consultation programme on the Draft Plan.</p> <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p>
1.4.0 Core Strategy	
<p>1. Recommendation that any proposed additional zoning / development of lands and associated population growth should be consistent with the Greater Dublin Area Regional Planning</p>	<p>Chief Executive's Response and Recommendation</p> <p><u>Statutory Requirements and Environmental Assessment</u></p> <p>The statutory legislative requirements for County Development Plans in</p>

<p>Guidelines in particular. The ability of such lands to provide adequate and appropriate critical service infrastructure, and take into account the requirements of the SEA, Habitats, Floods and Water Framework Directives respectively, should also be taken into account. (DRAFTDEVPLAN0052, David Galvin, Environmental Protection Agency)</p> <p>2. Submission on behalf of landowner in Clonburris requests that the Core Strategy Map should identify location of the Cloburris and Adamstown SDZ locations. (DRAFTDEVPLAN0122, John Murphy, BMA Planning, Burris Property Company (In Receivership))</p> <p>3. Submission on behalf of land owner requests that the County Development Plan be amended to recognise the priority development status of Adamstown as an SDZ as advocated in Ministerial Guidelines on Development Contributions and that the Core Strategy identifies Adamstown SDZ as a 'priority development area'. It is requested that the Cores Strategy be amended to confirm 'priority development areas' as the most significant area for growth followed by 'Key Development Areas' and then 'Major Development Areas'. (DRAFTDEVPLAN0197, Stephen Little, Stephen Little & Associates, Castlethorn Construction)</p> <p>4. In the submission of the Eastern and Midland Regional Assembly it is noted that the core strategy is proposing a new "moderate sustainable growth town" designation for Saggart/Citywest. It is acknowledged that this reflects the level of existing services in the area, infrastructural capacity for further residential and commercial development and the significant growth that has taken place in the last decade as reflected in the Fortunestown LAP. It is advised that the settlement hierarchy should be cognisant of the hierarchy prescribed in the Regional Planning Guidelines for South Dublin. (DRAFTDEVPLAN0500, Malachy Bradley, Eastern and Midland Regional Assembly)</p>	<p>terms of compliance with the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 is stated in Sections1.4.0 of the Draft Plan 2016-2022.</p> <p>A Strategic Environmental Assessment (SEA) Report, an Appropriate Assessment Screening Report together with Floods Risk Assessments were carried out in parallel with the Draft Plan and helped to inform the County Development Plan review process (including the formulation of the Core Strategy) on matters relating to SEA, Habitats, Floods and Water Framework Directives.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Clonburris and Adamstown</u> The Core Strategy contained in the Draft Plan has been prepared in accordance with the requirements of S.10 of the Planning and Development Act 2000 (as amended), Circular Letter: PSSP6/2010 and the Guidance Note on Core Strategies 2010 (DECLG). The Ministerial Guidelines on Development Contributions relate to the preparation of Development Contribution Schemes, which is a separate function that is beyond the scope of the strategic land use and transportation functions of the County Development Plan.</p> <p>The Core Strategy contained in the Draft Plan designates Lucan and Clondalkin as Metropolitan Consolidation Towns in accordance with the Regional Planning Guidelines for the Greater Dublin Area 2010-2022. This places both Lucan and Clondalkin, including lands within Adamstown and Clonburris, within the second tier of the County's settlement hierarchy and recognises that these towns including their SDZ areas will continue to be developed at a scale that consolidates the Metropolitan Area and supports key public transport corridors. The Core Strategy incorporates the housing capacity of the Adamstown and Clonburris SDZs within the calculations for Lucan and Clondalkin, which negates the need to isolate the SDZ areas</p>
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<p>5. Submission received from the Department of Environment, Community and Local Government notes that the Draft Plan includes Saggart/Citywest in the SDCC Settlement Strategy as a 'Moderate Sustainable Growth Town' (s.1.7.3), representing an addition to the GDA Settlement Strategy, proposed independently. Submission notes that preparation of the RSES will be undertaken by the Regional Assembly in conjunction with the constituent local authorities, and that any potential change to the Settlement Strategy at a regional level can appropriately be considered in this future statutory process for the RSES.</p> <p>Submission notes that in the interim, it is premature for South Dublin County Council to propose this designation as it is uncertain what its meaning is. Submission advises omission of the proposed designation of Saggart/Citywest as a 'Moderate Sustainable Growth Town' from the Draft South Dublin County Development Plan as it is not consistent with the Settlement Strategy (section 4.5) of the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 as required by the Planning & Development Act 2010. (DRAFTDEVPLAN0183, Minister for Environment, Community & Local Government, Department of the Environment, Community & Local Government)</p>	<p>under the Core Strategy.</p> <p>The Consolidation Area within the Gateway of Dublin is identified within the top tier of the Core Strategy's settlement hierarchy. This is designated in accordance with the Regional Planning Guidelines in order to promote the consolidation and sustainable intensification of the existing urban/built form to the east of the M50 thereby maximising efficiencies from establishing physical and social infrastructure</p> <p>The identification of a sub-hierarchy within the Core Strategy and Core Strategy Map that would prioritise Adamstown or Clonburris would be at variance with the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 and would also undermine the development of the Consolidation Area within the Gateway and the Metropolitan Consolidation Towns of Lucan and Clondalkin. The position of the County's SDZ's are appropriately reflected in the Core Strategy.</p> <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Saggart-Citywest Moderate Sustainable Growth Town</u></p> <p>The Core Strategy settlement hierarchy contained in the Draft Plan 2016-2022 is based on the settlement hierarchy identified under the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 and has been advanced to align with the settlement typologies identified and defined under the Regional Planning Guidelines including those that relate to "Small Towns" and "moderate sustainable growth towns".</p> <p>Saggart-Citywest has emerged as a settlement with a high level servicing function that is consistent with the characteristics of a Moderate Sustainable Growth Town as defined by the Guidelines. The population of Saggart-Citywest has also increased significantly in the last decade and exceeds the threshold identified for a "Small Town".</p>
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	<p>The designation as a “Moderate Sustainable Growth Town” acknowledges the range of local services that have developed within the settlement area since the adoption of the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 including high quality public transport connections with Dublin City Centre and Tallaght (Luas Red Line), which support existing high level employment (Citywest Business Park and Hotel) and retail (Saggart Village and Citywest Shopping Centre) functions.</p> <p>Taken in conjunction with the extent of economic activity, the quality of public transport provision and the designation of Citywest Shopping Centre as a Level 3 Retail Centre in the Retail Strategy for the Greater Dublin Area 2008-2016, it is considered that a Moderate Sustainable Growth Town designation appropriately reflects the settlement’s capacity to provide for further sustainable housing growth that is linked to economic expansion, retail offer and public transport accessibility.</p> <p>The emergence of Saggart-Citywest as a relatively self-sufficient settlement is evident from Census 2011 POWSCAR data, which reveals major employment growth in Citywest with a relatively high jobs yield of 33 jobs/ha. Data on trips to work reveals that Citywest achieved some of the highest level of trips by foot in the County (9-12%) and that, as an employment centre, Citywest benefits from having the highest concentrations of employees in the County from within the same or adjoining ED i.e. the largest number of trips to the ED for Citywest are from within the same ED and immediately adjoining EDs.</p> <p>The submission of the Eastern and Midland Regional Assembly on the Draft Plan advises that cognisance should be given to the Regional Planning Guidelines but also recognises that the Moderate Sustainable Growth Town designation for Saggart-Citywest “...is reflected in the level of existing development and services in this area coupled with infrastructural capacity for further residential development as expressed in the scale of zoned lands”. This indicates that the planning rationale for the proposed designation is supported by the regional assembly.</p> <p>Concern raised under the submission of the DECLG appears to be based</p>
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	<p>on the timing of the proposed designation, pending the review of the Regional Planning Guidelines for the Greater Dublin Area 2010-2022. It is considered that in principle, neither the submission of the Regional Assembly or DECLG highlight an over-riding issue with the rationale for the proposed designation of Saggart/Citywest as a “Moderate Sustainable Growth Town”. It is considered that at this stage of the Development Plan preparation process, the planning rationale for the designation, should take precedence over concerns in relation to the timing of the designation particularly in the context of the impending review of the Regional Planning Guidelines.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>1.6.0 Housing Land Capacity</p>	
<p>1. Land at Kilmashogue House Edmonstown represents a significant land asset in terms of scale and location and could make a substantial contribution to the housing target for South Dublin. Edmonstown is an established suburban area to the north/east of the M50 of distinct identity, community and character and it is requested that it is listed as a Consolidation Area within the Gateway. It is proposed that CS1 Objective 3 be amended to work with stakeholders and remove obstacles to the development of zoned lands. (DRAFTDEVPLAN0076, Richard Butler, Cunnane Stratton Reynolds , Edward and Joan Fox)</p> <p>2. There is an adequate supply of zoned land in South Dublin County to meet current and future needs for the next 20 years and no substantial area of land (greater than 5 ha) should be rezoned for residential development. Any proposals to rezone small areas of land should be supported by a strong justification. Adamstown is well placed to provide for housing shortages. (DRAFTDEVPLAN0225, Joanna Tuffy, TD - Constituency of Dublin)</p>	<p>Chief Executive’s Response and Recommendation <u>Edmondstown</u> Edmondstown is identified as being within the Consolidation Area within the Gateway on the South Dublin County Core Strategy Map (Fig 1.1) and within the Housing Land Capacity Tables (Tables, 1.8 and 1.9). It is noted that lands are zoned for residential development under the current Plan 2010-2016 and are located within the Metropolitan Consolidation Area of the County where residential consolidation is promoted. The lands, however, have limited accessibility off the rural Whitechurch Road and the opportunities for improving accessibility are constrained by adjoining barriers created by the M50 and Edmondstown Golf Club.</p> <p>CS1 Objective 3 relates to the principle of promoting and supporting the development of undeveloped zoned lands. The provision of an objective in the Draft Plan 2016-2022 for the local authority to work with stakeholders and remove obstacles to development, as requested in a submission received, would undermine third party rights and the Development Management process set out under Part III of the Planning and Development Act 2000 (as amended). CS1 Objective 3 could, however, be</p>

<p>Mid-West)</p>	<p>amended to promote pre-application consultation that is carried in accordance with Section 247 of the Planning and Development Act 2000 (as amended). This would ensure that the objective is amended in a manner that does not prejudice the performance of the local authority.</p> <p>Recommendation It is recommended that CS1 Objective 3 of the Draft County Development Plan be amended to promote pre-application consultation in accordance with Section 247 of the Planning and Development Act 2000 (as amended).</p> <p><u>Housing Land Capacity</u> The submission in relation to the adequacy of zoned lands to meet current and future needs in the County is noted and accepted.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>1.9.0 Local Area Plans, Approved Plan & Studies</p>	
<p>1. Submission on behalf of Aldi Stores (Ireland) raises concerns in relation to the scale of the area identified under CS6 SLO 1 (Walkinstown to Greenhills) for an LAP and potential to hinder development that could be considered to be premature prior to the adoption of an LAP. It is recommended that the SLO be amended to ensure that development is assessed in a normal manner prior to the adoption of any plan. (DRAFTDEVPLAN0091, Alan Whelan, O'Connor Whelan, Aldi Stores (Ireland) Limited)</p> <p>2. Submission on behalf of landowners recommends that the requirements for design statements in relation to developments in excess of 10 dwellings (11.2.6) together with the requirement to assess developments against urban design criteria should obviate the need for Local Area Plans. It is requested that a less</p>	<p>Chief Executive's Response and Recommendation <u>Walkinstown - Greenhills LAP</u> The lands described for the preparation of an LAP under CS6 SLO 1 of the Draft Plan 2016-2022 are centred on the development potential of the REGEN and LC zoned lands located around the Walkinstown area.</p> <p>A submissions from a retail operator advises that the proposed LAP boundary should be reduced to ensure that small scale retail development is not hindered. A further submission made on behalf of a landowner suggests that the LAP boundary should be expanded to include an additional 21 hectares of brownfield lands zoned Objective EE on the northern and southern sides of the Naas Road near the junction with the Long Mile Road.</p> <p>The lands that are covered under CS6 SLO 1 and the proposed LAP extension lands (five sites located at and adjacent to the Naas Road and</p>

<p>prescriptive LAP for Newcastle should go on public display. (DRAFTDEVPLAN0338, Eamonn Prenter, Cunnane Stratton Reynolds, Chesterbridge Developments Ltd., and Maplewood Developments Ltd)</p> <p>3. Submission on behalf of landowner advises that the requirement for a design statement for 10 houses or more should obviate the need for Local Area Plans or Action Area Plans. (DRAFTDEVPLAN0341, Eamonn Prenter, Cunnane Stratton Reynolds, Mr Alan Hanly)</p> <p>4. Submission relates to five sites located at and adjacent to the Naas Road and Long Mile Road junction. Submission requests extension of the LAP proposed under CS6 SLO1 to the north of the Naas Road to include subject lands located to north of same, with wording of SLO be modified to include adjoining lands immediately to the north of Naas Road within 400-500m of the Naas Road transportation corridor) to the city boundary, and along the boundary back to Walkinstown Roundabout. Submission advises that proposed amendment to CS6 SLO1 would contribute to the consolidation and sustainable intensification of existing urban/suburban built form to the east of the M50, would be consistent with the provisions of the Naas Road Framework Plan, and would be consistent with proposed Core Strategy (CS) Policy 6 objectives. (DRAFTDEVPLAN0081, Declan Brassil, Declan Brassil & Co., Harris Group of Naas Road)</p> <p>5. - Request that the Plan include a Local Area Plan to support Balgaddy as a sustainable community, served by adequate community facilities provided in tandem with housing development. (DRAFTDEVPLAN0274, Lorraine Hennessy, Balgaddy Working Together Group)</p>	<p>Long Mile Road junction) are included in the Naas Road Framework Plan 2010. It is not considered that lands on the northern side of the Naas Road (N7) are necessary or relevant to the preparation of an LAP that is centred on the Walkinstown area by reason of their isolation and separation from the REGEN and LC zoned lands and their lower potential for major development during the lifetime of the proposed Draft Plan. The proposed extension lands on the northern side of the Naas Road are also located within close proximity to an additional Seveso/dangerous substances site and are subject to flood risk. The proposed extension site on the southern side of the Naas/Longmile Road is included within the description of lands covered by CS6 SLO 1.</p> <p>The Local Centre zoned lands located around the Walkinstown area provides an ideal opportunity to provide a hub for development and uses to focus around and increase the vitality and viability of development in accordance with the policies and objectives of the Draft Plan.</p> <p>The Local Area Plans Guidelines for Planning Authorities 2013 (DECLG) advise that the decision to prepare a local area plan and include a specific objective in a development plan should "... take on board criteria such as the degree to which major development is anticipated such as to justify the preparation of a standalone local area plan, the resource implications and the need to focus resources in using the local area plan process for areas where major alterations to the built environment are anticipated". Section 28 of the Planning and Development Act 2000 (as amended) states that all planning authorities shall have regard to such Ministerial Guidelines in the performance of their functions.</p> <p>It is therefore considered more appropriate to focus the LAP around the planning and development of lands that are zoned for regeneration (REGEN) and local centre (LC) uses and are located adjacent to such zones.</p> <p>An extension or reduction of the proposed LAP boundary is therefore not warranted. It is accepted that CS6 SLO 1 should be amended to ensure that the Naas Road Framework Plan 2010 is taken into consideration during the</p>
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	<p>preparation of the LAP.</p> <p>Recommendation It is recommended that CS6 SLO 1 of the Draft County Development Plan be amended to ensure that the Naas Road Framework Plan 2010 is taken into consideration during the preparation of the LAP.</p> <p><u>Requirement for Local Area Plans/Design Statements</u> Local Area Plans are necessary where new development areas require a co-ordinated approach particularly areas that are likely to experience large scale development or are in need of regeneration such as lands that are zoned LC (Local Centre) RES-N (new residential communities) and REGEN (enterprise and/or residential regeneration). This is consistent with the emergence of a plan-led approach to planning particularly in relation to areas that are designated for significant development. Section 19 of the Planning and Development Act 2000 (as amended) also makes it a mandatory requirement to make local area plans for certain areas.</p> <p>The Local Area Plans Guidelines for Planning Authorities 2013 (DECLG) advise that "...statutory local area plans provide for proper consultation with the public and statutory consultees, and are subject to approval by elected members and together with the Development Plan, establish a key element of the policy context for making decisions on planning and appeals". This reflects the opportunities afforded under the Local Area Plan process for third parties including community groups to engage with the plan making process.</p> <p>Design statements relate to more detailed aspects of an individual site and development such as building materials and are generally used to demonstrate compliance with the requirements of a Local Area Plan or County Development Plan and therefore complement statutory plans. Within this context, the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009 (DECLG) advise that design statements "...should address all relevant development plan or local area plan design policies and objectives, and relate them to the site".</p>
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	<p>Design statements are not subject to statutory public consultation procedures and are not sufficiently strategic in nature to replicate the benefits of Local Area Plans in terms of ensuring that a co-ordinated approach is taken between adjoining developments and involving local communities.</p> <p>The suggested use of design statements to obviate the need for Local Area Plans would therefore be contrary to statutory requirements prescribed under Planning Legislation, ministerial guidelines and the plan led approach to significant development areas.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Balgaddy</u> Lands in Balgaddy are already substantially developed and large scale future development is not anticipated during the lifetime of the Draft Plan 2016-2022. Within the context of the aforementioned recommendation of the Local Area Plans Guidelines for Planning Authorities 2013 (DECLG), the preparation of a Local Area Plan for Balgaddy is not considered to be warranted.</p> <p>In the context of major alterations to the built environment that are anticipated for that area, it is noted that work on a new Clonburris Strategic Development Zone Plan for undeveloped zoned lands to the south of Balgaddy is planned.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
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1.10.0 Strategic Development Zones	
<ol style="list-style-type: none"> 1. Request that the County Development Plan 2016-2022 acknowledge SDCC's commitment to undertake and complete a review of the Clonburris SDZ Scheme. (DRAFTDEVPLAN0079, John Pope, PAMES Asset Management Limited, Burris Property Company (in receivership), Everglade Properties (in receivership), Dietacaron, Kelland Homes) 2. Submission on behalf of Clonburris landowner notes that the identified housing land capacity for the Clonburris SDZ and LAPs lands for the duration of the Development Plan is specified and that the Draft Plan also states the overall capacity of the Clonburris SDZ Planning Scheme. It is submitted that the stated figures give a misleading impression of the capacity of the lands and may be used to undermine proposals to lower densities in a revised planning scheme. It is requested that a statement be inserted into the Core Strategy that refers to the intention to review the density in the Planning Scheme and that the likely reduction in residential yield be stated. (DRAFTDEVPLAN0122, John Murphy, BMA Planning, Burris Property Company (In Receivership)) 	<p>Chief Executive's Response and Recommendation</p> <p>Section 1.10.0 of the Draft Plan 2016-2022 correctly identifies that the Clonburris SDZ Planning Scheme 2008, as setting out a planning framework to support the delivery of 11,505 dwelling units. This is the stated capacity of the SDZ lands as detailed under the adopted Planning Scheme</p> <p>It is accepted that Section 1.10.0 should be amended to acknowledge the planned review of the Clonburris SDZ Planning Scheme. Any attempt to pre-empt the review of the SDZ planning scheme and to stipulate revised dwellings numbers in the Draft Plan prior to going through the prescribed statutory SDZ review process including the requirement to carry out public consultation would, however, be inappropriate and at variance with Section 169 of the Planning and Development Act 2000 (as amended).</p> <p>Recommendation</p> <p>It is recommended that Section 1.10.0 of the Draft County Development Plan be amended to acknowledge the planned review of the Clonburris SDZ Planning Scheme.</p>

Chapter 1 Summary of Recommended Amendments to the Draft Plan

Section	Response Issue	Recommendation
1.6.0 Housing Land Capacity	Edmondstown	Amend CS1 Objective 3 to promote pre-application consultation in accordance with Section 247 of the Planning and Development Act 2000 (as amended).
1.9.0 Local Area Plans, Approved Plan & Studies	Walkinstown - Greenhills LAP	Amend CS6 SLO 1 to ensure that the Naas Road Framework Plan (2010) is taken into consideration during the preparation of the LAP.
1.10.0 Strategic Development Zones	General	Amend Section 1.10.0 to acknowledge the planned review of the Clonburris SDZ Planning Scheme.

CHAPTER 2 - HOUSING

2.1.0 Housing Strategy	
<ol style="list-style-type: none"> Proposed SLO on lands at Avondale Gate Lodge, Old Lucan Road, Palmerstown to allow for development of a high quality nursing home facility. (DRAFTDEVPLAN0050, Jong Kim, AKM Consultants , Liam Mulvaney) The plan should promote social inclusion. (DRAFTDEVPLAN0043, Lorraine Hennessey, Balgaddy Working Together Group) Request to reword H3 SLO 1 (retirement village at Edmondstown) to provide for housing for Older People as part of an overall development with a density of not less than 35 units per (net) hectare. The following reasons are given: <ul style="list-style-type: none"> - The residential density specified in the proposed SLO does not comply with the Sustainable Residential Development in Urban Areas - Guidelines for Planning Authorities. Retaining the proposed density of not more than 20 units per hectare is inconsistent with the guidance for Outer Suburban / 'Greenfield' sites contained in Sustainable Residential Development in Urban Areas guidelines. - The subject lands should not be restricted exclusively for retirement village housing. The scale of the entirety of the lands (approximately 35 hectares) would be contrary to creating sustainable and mixed residential communities and including policies regarding social inclusion and access to existing services and amenities. (DRAFTDEVPLAN0112, Ian McGrandles, IMG Planning Limited, Javana Limited (in Receivership) c/o Duff & Phelps (Ireland) Limited) Remove H3 SLO1 from Development Plan (retirement village at Edmondstown) on basis of: 	<p>Chief Executive's Response and Recommendations</p> <p>The Chief Executive has carefully considered the issues raised in relation to the Housing Strategy and provides responses and recommendations under the following subheadings:</p> <ul style="list-style-type: none"> Proposed SLOS Nursing and Retirement Developments in Peripheral Areas Housing Mix and Social Integration, Edmondstown SLO Housing Need and Part V Policy for Social Inclusion and Integration of Housing for Older People Brittas and pNHA Retirement and Nursing Home Proposals, Miscellaneous <p><u>Proposed SLOs Nursing and Retirement Developments in Peripheral Areas</u></p> <p>Many of the submissions summarised above seek the provision of Specific Local Objectives that would provide for the location of nursing home and retirement developments in isolated and peripheral areas of the County that do not have access to the required social and physical infrastructure, services and facilities for residents and visitors. The location of housing for older people in such areas would be at variance with the policies and objective of the Draft Plan 2016-2022 and the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009 (DECLG).</p> <p>The developments that are proposed under the SLOs are also limited in terms of the choice of housing that would be offered for older people and largely comprise nursing or retirement home proposals. This would undermine the approach of the Draft Plan policy to encourage integrated communities and provide viable and attractive alternatives for older people to downsize to smaller houses within their own communities or existing communities.</p>

<ul style="list-style-type: none"> - Conflict with other policy and objectives contained in the Development Plan that seeks to promote housing for older people within established and mixed use areas that are proximate to existing services and amenities; - Absence of prospects to develop a successful retirement village; - Contrast with other SLOs that promote accommodation for older people and are considered to be more appropriate; - Inefficient use of lands zoned for housing within the M50. <p>(DRAFTDEVPLAN0075, Martin Cunningham)</p> <p>5. The lands at Kilmashogue Edmonstown correspond with the definition of outer suburban/greenfield sites under DEHLG Guidelines. It is noted that the lands cannot yield 30 dwellings or more per hectare due to road access constraints. It is submitted that by pre-emptively limiting the density of development under H3 SLO 1, this removes the motivation for improving road access to a potentially important land/housing asset. It is suggested that the restriction on residential density under H3 SLO 1 be removed and that this be replaced by a requirement to develop the lands within the capacity of available infrastructure.</p> <p>(DRAFTDEVPLAN0076, Richard Butler, Cunnane Stratton Reynolds , Edward and Joan Fox)</p> <p>6. Owners of lands at Kilmashogue Edmonstown are not opposed to the provision of older people's accommodation as specified under H3 SLO. The following concerns are submitted:</p> <ul style="list-style-type: none"> - The model of independent living, semi-independent and nursing home accommodation in a single facility has not proved successful in Ireland; - The SLO applies to the entire RES zoned in Edmonstown and would create an unviable development scenario; - The SLO would result in the establishment of a large, homogenous and isolated older people's community in a manner that is contrary to best practice. <p>It is suggested that the SLO be amended to allow for the lands to be developed as a sustainable residential neighbourhood with a</p>	<p>The Core Strategy already ensures that there are sufficient zoned lands in appropriate areas of the County to provide for all the housing needs of the County including housing for older people thus negating the need for SLOs for additional housing on specific sites that are peripheral, sensitive to development and are not zoned for residential development.</p> <p>Many of the proposed SLOs relate to visually and environmentally sensitive sites that are zoned 'RU' (Rural) or 'HA' (High Amenity - Liffey Valley, Dodder Valley and Dublin Mountains) where residential development is open to consideration subject to compliance with carefully considered criteria such as the need to accord with rural housing policy.</p> <p>The proposed SLOs would essentially bypass policy and criteria contained in Draft Plan that sets out to ensure that residential development is assessed from first principles and occurs in appropriate areas of the County and that only small scale development that is related to rural communities or high amenity areas occurs in environmentally and visually sensitive areas of the County.</p> <p>It is also proposed to insert an SLO on lands zoned 'OS' (Open Space) in an emerging area of the County along the Kiltipper Road where residential development is listed as open for consideration thus negating the need for an SLO that would pre-empt the Development Management process including assessment against H3 Objective 3 of the Draft Plan, which seeks to support community led housing for older people on lands zoned objective 'OS' in established areas.</p> <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Housing Mix and Social Integration</u></p> <p>The Draft Plan 2016-2022 sets out to ensure that new residential development provides a wide variety of housing types that cater for the</p>
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<p>density that is determined by the capacity of available infrastructure. (DRAFTDEVPLAN0076, Richard Butler, Cunnane Stratton Reynolds, Edward and Joan Fox)</p> <p>7. Exclude H3 SLO 1 (Edmondstown Retirement Village) from the Development Plan in the context that it is contrary to H3 Objective 1 (support housing for older people in mixed use areas and the isolation of the site from public transport and existing communities. (DRAFTDEVPLAN0212, Doireann Ni Cheallaigh, An Taisce DRAFTDEVPLAN0496, Patrick Leonard, An Taisce)</p> <p>8. It is considered that H Policy 2 (Supply of Housing) and its objective is superfluous and is covered by H1 and H3 Policy Objectives. (DRAFTDEVPLAN0225, Joanna Tuffy, TD - Constituency of Dublin Mid-West)</p> <p>9. Objection to H3 SLO1 which seeks 'To develop lands at Edmondstown (former Kilmashogue House) for the purpose of a retirement village (independent, semi-independent and nursing home accommodation) at a density of not more than 20 units per hectare (not more than 8 units per acre)' due to unsuitable location. (DRAFTDEVPLAN0383, Angela O'Donoghue, Glendoher & District Residents Association DRAFTDEVPLAN0384, Angela O'Donoghue, Rathfarnham Area Residents Association)</p> <p>10. Policy that encourages integration in relation to housing and social mix with the aim of reversing social exclusion and disadvantage should form the basis of the County Development Plan. (DRAFTDEVPLAN0253, Lorraine Hennessy, The Workers' Party)</p> <p>11. Submission on behalf of landowners requests for the replacement of the 15% social housing requirements with a 10% requirement as approved under the Urban Regeneration and Housing Act 2015. It is also requested that it be confirmed that accommodation for travellers can be offset against the Part V social housing</p>	<p>diverse housing needs of the County's population and counteract segregation between differing household types.</p> <p>The Interim Housing Strategy contained in Schedule 3 of the Draft Plan sets out a range of measures and objectives to (inter alia) address housing segregation through:</p> <ul style="list-style-type: none"> ▪ the provision of a mix of house types in all new residential development that meets the categories of social housing identified for each area; ▪ the reservation of a percentage of all lands zoned for residential use or for a mixture of residential uses for the purpose of social and affordable housing; ▪ the provision of housing in sustainable communities. <p>These measures are supported by the objectives set out under Housing Policy 1 (Housing Strategy) of the Draft Plan including H1 Objectives 4 and 8, which promote social integration and seek to facilitate a diverse range of dwelling tenures within housing developments and avoid a concentration of social housing. Housing Policy 10 further sets out to ensure that a wide variety of adaptable housing types, sizes and tenures are provided in the County in accordance with the provisions of the Housing Strategy. The Draft Plan therefore promotes social integration between households in accordance with that suggestion under the submissions received.</p> <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p> <p>Edmondstown SLO</p> <p>It is accepted that the wording of H3 SLO1 (independent, semi- independent and nursing home accommodation for older people at Edmondstown) appears to be inconsistent with the policies and objectives of the Draft Plan 2016-2022 to direct housing for older people to established residential and mixed use areas that offer a choice and mix of accommodation types at locations that are proximate to services and amenities.</p>
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<p>requirement and that this also be reflected in Section 6.3 of the Housing Strategy. (DRAFTDEVPLAN0338, Eamonn Prenter, Cunnane Stratton Reynolds, Chesterbridge Developments Ltd., and Maplewood Developments Ltd)</p> <p>12. Submission supports and seeks to retain H3 SLO4 which seeks 'To support the retirement development permitted under SD14A/0021 - PL 06S.243745 In Ballynakelly, Newcastle until such time as that permitted development is complete'. (DRAFTDEVPLAN0503, Johny & Katy Janssens)</p> <p>13. Submission seeks the inclusion of a site specific objective for the development of a nursing home on the northern side of Brittas village centre (DRAFTDEVPLAN0207, Joe Bonner, Joe Bonner Planning, Glen and Sarah Walker)</p> <p>14. Submission on behalf of landowners requests for the replacement of the 15% social housing requirements with a 10% requirement as approved under the Urban Regeneration and Housing Act 2015. (DRAFTDEVPLAN0341, Eamonn Prenter, Cunnane Stratton Reynolds, Mr Alan Hanly)</p> <p>15. Submission seeks the inclusion of site Specific Local Objectives for lands adjacent to the Brittas Ponds to provide for 1). an Integrated Recreation and Tourism facility including a Boutique Hotel and Angling Venue and 2). a Retirement Village. The boutique hotel accommodation and angling facilities would be located on the shores of the largest pond while the retirement village would be located on the eastern shore of the northern pond. It is submitted that the proposed hotel will enhance the existing character of the village and will facilitate the realisation of the tourism potential of the village, as an angling venue set around Brittas Ponds and as a gateway to the Dublin Mountains from South Dublin for walkers, hikers and cyclists, while the long term viability of the local</p>	<p>The intention of the SLO is to incentivise and integrate housing for older people within a larger residential development on residential zoned lands that can include services and amenities to serve all housing.</p> <p>These residential zoned lands are located within the Metropolitan Consolidation Area of the County where residential consolidation is promoted, however, the site has limited accessibility off the rural Whitechurch Road and the opportunities for improving accessibility are constrained by adjoining barriers created by the M50 and Edmondstown Golf Club.</p> <p>The density prescribed under the H3 SLO1 increases the density stated under SLO 91 of the current Plan 2010-2016 for housing for older people but maintains a lower density for general housing. A similar approach was applied to nearby residential zoned lands under the Ballycullen-Oldcourt Local Area Plan 2012, where densities of 12-18 dwellings per hectare were prescribed for the more constrained area of the Plan Lands. The Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009 (DECLG) recognise that there may be a need for lower density schemes in limited circumstances near cities and larger towns.</p> <p>It is recommended that H3 SLO1 be amended to facilitate low density residential development at Edmondstown at a net density of not more than 12 dwellings per hectare and to promote housing for older people (nursing home, independent and semi-independent) as a fully integrated part of such development with an increased density of not more than 20 dwellings per hectare to apply to independent and semi-independent housing for older people. The SLO should state that all residential development including housing for older people shall be integrated within sustainable residential neighbourhoods that are served by shared public open space, community and local facilities.</p> <p>The intention of the proposed amended H3 SLO1 is to provide for an increase in density (from the existing SLO 91 in the current 2010-2016 Plan) for housing for older people at this location. The rationale for this approach</p>
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<p>community will be secured by the creation of sustainable employment in both the hotel and the retirement village. Submission outlines that the amendments should be considered in the context of the recently announced Feasibility Study And Masterplan For A Flagship Tourism Facility For The Dublin Mountains and the 'Brittas Planning Study' that is to be carried out in accordance with CS6 SLO.</p> <p>(DRAFTDEVPLAN0250, Joe Bonner, Joe Bonner Planning, Annod Ltd DRAFTDEVPLAN0251, Joe Bonner, Joe Bonner Planning, Annod Ltd DRAFTDEVPLAN0252, Joe Bonner, Joe Bonner Planning, Annod Ltd)</p> <p>16. Submission relates to lands adjacent to the River Dodder and Kiltipper Road. The Long term road from Bohernabreena to Kiltipper and the NTA Cycle Network Plan bisects the lands. Additionally, a Geological site for protection was identified in the centre of the lands, part of lands were re-designated as part of Dodder Valley zone and the part of the site is earmarked for some time to form part of the Dodder Valley Linear Park.</p> <p>Submission requests a specific local objective for the lands at Kiltipper Road to accommodate the potential of developing additional sporting facilities with Thomas Davis, a nursing home, a retirement facility and possibly limited low density residential development. Proposal would include provision of NTA Cycle Network Plan, possible ceding of lands for Dodder Valley Linear Park and would have a strong community benefit and adhere to the important amenity and transportation objectives of SDCC. Submission requests a meeting to discuss the achievement of the Plan objectives and the clients objectives.</p> <p>(DRAFTDEVPLAN0203, Eoin O Cofaigh, McHugh O Cofaigh Architects, David Kennedy)</p> <p>17. Submission seeks the inclusion of a site specific SLO objective for the development of a nursing home or retirement village on lands to southeast of Hunters residential development, Ballycullen, due to suitable location and proximity to existing infrastructure.</p>	<p>is based on research that outlines that the projected traffic generation for the higher density (20 per ha) of housing for older people is equivalent to the lower density (12 per ha) for general residential development.</p> <p>It should also be stated that permissible densities may be increased in accordance with the relevant ministerial guidelines where issues of accessibility have been fully resolved in an appropriate manner.</p> <p>Further to a submission from the adjoining golf club it is not considered necessary or appropriate to prescribe a substantial open space buffer along the boundary of the Golf Club in the context that:</p> <ul style="list-style-type: none"> ▪ This would sterilise a substantial portion of lands zoned for residential development, which will contribute to meeting the housing needs of the County as outlined under the Core Strategy. ▪ The lands are zoned for residential development under the current Plan 2010-2016 without restriction on the location of development; ▪ A prescribed buffer to development would prejudice the layout of development and pre-empt the development management process. This could also limit the opportunity to improve access and permeability to the lands ▪ The density proposed on the subject site is significantly lower compared to the existing residential development that abuts the golf club along its northern boundaries. <p>Recommendation</p> <p>It is recommended that H3 SLO1 (Edmondstown-former Kilmashogue House) of the Draft County Development Plan be amended to facilitate low density residential development at Edmondstown at a net density of not more than 12 dwellings per hectare and to promote housing for older people (nursing home, independent and semi-independent) as a fully integrated part of such development with an increased density of not more than 20 dwellings per hectare to apply to independent and semi-independent housing for older people. The SLO should state that all residential development including housing for older people shall be integrated within a sustainable residential neighbourhood that is served by shared public open space, community and local facilities. It should also be stated that</p>
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<p>(DRAFTDEVPLAN0110, Tony Manahan, Manahan Planners, Jones Investments Ltd)</p> <p>18. Objection to proposed Policy H3 SLO1, which seeks 'To develop lands at Edmondstown (former Kilmashogue House) for the purpose of a retirement village (independent, semi-independent and nursing home accommodation) at a density of not more than 20 units per hectare (not more than 8 units per acre)', on the basis that it may negatively impact on the existing amenity and functionality of Edmondstown Golf Club. Submission requests that an area of at least 30 metres in width be reserved for communal open space purposes along the Golf Club boundary in this regard. (DRAFTDEVPLAN0497, Mark Lynch, Edmondstown Golf Club)</p> <p>19. Submission relates to rezoning of lands at Andy Moore Park, Kiltipper Road, Oldbawn from OS to RES to make provision for a nursing home and care centre development on said lands. Submission requests inclusion of additional SLO under Section 2.1.2 Housing for Older People, Policy H3, on the subject lands as follows to facilitate same: H3 SLO5: 'To support the development of a nursing home and care facility on part of the lands at the Dublin Postal Sports and Social Club, Kiltipper Road'. (DRAFTDEVPLAN0184, Vivienne Boylan, BMA Planning and Development Consultants, Dublin Postal Sports and Social Club)</p> <p>20. Submission recommends a metric of one social house per 100 population and requests that no more social housing or accommodation for refugees be provided in areas identified as disadvantaged on Pobal maps. (DRAFTDEVPLAN0261, Gerard Stockil, Tallaght Community Council)</p> <p>21. Request to include an additional objective under Policy H4 Student Accommodation to require that a minimum of 10% of apartment accommodation in the vicinity of IT Tallaght be designated as</p>	<p>permissible densities may be increased in accordance with the relevant ministerial guidelines where issues of accessibility have been fully resolved in an appropriate manner.</p> <p><u>Housing Need and Part V</u> Housing Policy 2 of the Draft Plan 2016-2022 relates to the need to ensure that the quantum and location of zoned lands in the County are sufficient to satisfy the overall housing requirements of the County. Housing Policy 1 relates to the need to implement a Housing Strategy and address different housing needs within the County including social housing. Housing Policy 3 relates to the more specific need to manage housing for older people. Further to the suggestion to remove Housing Policy 2 from the Draft Plan by reason of perceived repetition, it is advised that each of the aforementioned policies cover different aspect of the housing and zoning needs of the County and it is vital that neither is removed from the Draft Plan.</p> <p>The Planning and Development Act 2000 (as amended) prescribes the mechanism for delivery of social and affordable housing including the percentage of lands that must be provided for such housing. In accordance with the legislation, this has also been incorporated into the Housing Strategy in terms of delivering overall housing need. There is no scope to amend the mechanism for delivery of social housing or the method for calculation of social housing need under the County Development Plan.</p> <p>Further to the submissions in relation to the recent amendments to Part V of the Planning and Development Act 2000 (as amended) under the Urban Regeneration and Housing Act 2015, it is recommended that Section 2.1.0, Housing Policy 1, H1 Objective 2 and the Housing Strategy contained in Schedule 3 of the Draft Plan be amended to reflect the legislative changes which largely took effect on the 1st of September 2015. This includes changes to the percentage of lands that must be provided for social and affordable housing and the prescribed mechanism to fulfil the Part V obligations.</p> <p>The stated intention to carry out a review of the Interim Housing Strategy in</p>
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<p>student accommodation. (DRAFTDEVPLAN0261, Gerard Stockil, Tallaght Community Council)</p> <p>22. Submission relates to a Traveller Accommodation and outlines that areas designated for Traveller Accommodation must be well served by, accessible and proximate to adequate educational and healthcare facilities; retail, community, recreational and support facilities; and, sustainable public transport systems, consistent with the principles of prepare planning and sustainable development, to ensure that the travelling community have educational and health status, life expectancy and a quality of life comparable the settled community. (DRAFTDEVPLAN0082, Declan Brassil, Declan Brassil & Co., Harris Group)</p>	<p>the Draft Plan is no longer necessary and should be removed from the Draft Plan and the finalised Housing Strategy.</p> <p>Recommendation It is recommended that Section 2.1.0, Housing Policy 1, H1 Objective 2 and the Housing Strategy contained in Schedule 3 of the Draft County Development Plan be amended to reflect the recent amendments to Part V of the Planning and Development Act (as amended) including changes to the percentage of lands that must be provided for social and affordable housing and the prescribed mechanism to fulfil the Part V obligations. The Interim Housing Strategy should also be amended to a finalised Housing Strategy that reflects the changes to Part V. The stated intention to carry out a review of the Interim Housing Strategy should also be removed from the Draft County Development Plan.</p> <p><u>Policy for Social Inclusion and Integration of Housing for Older People</u> The Draft Plan 2016-2022 seeks to provide for the housing needs of older people and to provide a range of accommodation choices within their own communities. This approach reflects the findings contained the Pre-Draft Public Consultation Background Issues Papers (SDCC, September 2014), which identified that the population of communities in the established areas of the County are stagnating or reducing and growing older and that the choice of housing for older people in these areas is also extremely limited. This in turn reduces the viability of existing social and physical infrastructure, services and facilities.</p> <p>In response to this, Housing Policy 3 (Housing for Older People) and H3 Objective 1 of the Draft Plan supports the provision of accommodation (independent, semi-independent or nursing home accommodation) for older people in established residential and mixed use areas that offer a choice and mix of accommodation types at locations that are proximate to services and amenities including pedestrian paths, local shops, parks and public transport.</p> <p>This policy response also reflects the recommendations of the Guidelines</p>
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	<p>for Planning Authorities on Sustainable Residential Development in Urban Areas 2009 (DECLG), which recognise that housing for older people should be developed to provide "...alternative residential choices for elderly people not wishing to enter a nursing home and may free up larger family homes in established residential areas."</p> <p>The approach of the Draft Plan is therefore twofold:</p> <ul style="list-style-type: none"> ▪ To enable social integration between people of all ages and provide choice for a range of house types within sustainable neighbourhoods and communities that is attractive to older people. ▪ To help free up existing housing stock in established areas of the County and address population decline, stagnation and housing need in such areas while maintaining support for social and physical infrastructure, services and facilities. <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Brittas and pNHA Retirement and Nursing Home Proposals</u></p> <p>Two submissions have been received that seek the inclusion of SLOs for a retirement village (as part of a tourism development) and nursing home developments on lands zoned Objective HA-DM (High Amenity - Dublin Mountains) to the north of Brittas within or adjacent to the Brittas Ponds/Slade of Saggart and Crookslin Glen proposed Natural Heritage Area (pNHA). Areas that are designated as pNHAs normally relate to habitats that are in need of protection under the Wildlife Act 1976-2010.</p> <p>This area of the proposed SLOs is subject to Draft Plan 2016-2022 objectives (H 23 and HCL 13 Objectives (1 and 2)) that seek to limit development to that which is directly related to the pNHA amenity potential, ensure that it is designed and sited appropriately and accords with rural housing needs policy in terms of compliance with local housing needs criteria. Section 11.5.5 also requires ecological and landscape impact assessments to be carried out for significant development in such visually</p>
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	<p>and environmentally sensitive areas.</p> <p>CS6 SLO 3 seeks the preparations of a planning study for Brittas Village, in consultation with local residents and local representatives, having regard to the implications of the proposed Natural Heritage Area designations, the future protection and enhancement of the village, the development of tourism potential in the area with a view to the long term viability of the local community.</p> <p>The inclusion of SLO's providing for substantial tourism facilities and associated retirement village and nursing home developments in the absence of essential scoping of the study, preliminary survey and research work and consultation with relevant stakeholders would be overly prescriptive and premature and undermine the impending planning study to an extent that it would significantly reduce its value in terms of the protection of the visual and environmental sensitivities of the area and compliance with the objectives of the Draft Plan in relation to zoning, its Core Strategy and the protection of natural heritage. It would also prejudice the opportunity to develop a plan in consultation with the local community that seeks to protect the visual and environmental sensitivities of the area. The proposed SLOs would also bypass the assessment of development from first principles in terms of visual impact, environmental impact and proper planning and sustainable development in terms of ensuring that residential development occurs in appropriate areas of the County and complies with the Core Strategy.</p> <p>Responses to the proposed development of the recreation and tourism facilities near Brittas are set out under the Chapter 4 Economic and Tourism Section below.</p> <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Miscellaneous</u></p>
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	<p>Support for H3 SLO4 is noted.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Traveller Accommodation</u> The County's Traveller Accommodation Programme 2014-2018 sets out Council policy regarding the provision of Traveller Accommodation and identifies the location of Traveller Accommodation Sites. The County's Traveller Accommodation Programme is therefore the pre-eminent document in relation to the location and delivery of such sites. The Traveller Accommodation Programme is supported by H Policy 5 of the Draft Plan 2016-2022 and its associated objectives, which seeks to ensure that Traveller Accommodation is located in proximity to services, including public transport, and is integrated with communities to include access to schools, GPs, shops, playgrounds and sports clubs.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Student Accommodation</u> Housing Policy 4 of the Draft Plan 2016-2022 supports the provision of accommodation for third level students in the campus of Third Level Institutions or at other appropriate locations that are proximate to centres of third level education. This includes residential development within IT Tallaght and proximate to IT Tallaght and would allow developments that exclusively provide for student accommodation i.e. 100% of accommodation or a mix of accommodation.</p> <p>This policy is further supported and promoted by reduced development standards for student accommodation under Chapter 11 of the Draft Plan in relation to the provision of one bedroom accommodation, children's play,</p>
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	<p>public open space and parking. The reduced standards aims to improve the viability of student accommodation and negates the need to or the widespread prescription rigid standards in terms of dwelling mix.</p> <p>The proposal to insert a minimum requirement for student accommodation for apartments in the vicinity of IT Tallaght would affect all residential development within the area including Tallaght's Urban Core regardless of market supply and demand for student accommodation.</p> <p>The widespread application of such a standard would be prejudicial to the viability of residential development within Tallaght's urban core, which is identified within a Metropolitan Consolidation Town under the Core Strategy. The suggested standard could therefore inhibit the achievement of the Core Strategy objectives in terms of meeting housing needs and consolidating a primary settlement area in the interest of the proper planning and sustainable development of the County.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
2.2.0 Sustainable Neighbourhoods	
<ol style="list-style-type: none"> 1. Achieve integration between new development and its surrounding physical environment. Avoid mono-functional areas that are vulnerable to hours of inactivity and lack natural surveillance. (DRAFTDEVPLAN0212, Doireann Ni Cheallaigh, An Taisce) 2. Submission on behalf of landowner recommends that housing densities should ne increased in order to help address any shortfall in the delivery of housing. (DRAFTDEVPLAN0338, Eamonn Prenter, Cunnane Stratton Reynolds, Chesterbridge Developments Ltd., and Maplewood Developments Ltd) 3. Submission on behalf of landowner requests that the Development 	<p>Chief Executive's Response and Recommendations The Chief Executive has carefully considered the issues raised in relation to Sustainable Neighbourhoods and provides responses and recommendations under the following subheadings:</p> <ul style="list-style-type: none"> ▪ Urban Design, Activity and Integration ▪ Housing Density ▪ Mix of Dwelling Types ▪ Suggested Building Height Limit and Apartments Ban - Tallaght <p><u>Urban Design, Activity and Integration</u> H7 Objectives 1 and 2 in Section 2.2.1 of the Draft Plan 2016-2022 seeks to ensure that residential development provides an integrated and balanced approach to (inter alia) place-making and streetscape design and is carried</p>

<p>Plan should seek to maximise densities for sites in close proximity to public transport such as Luas in order to enable the County Council to meet housing targets. It is noted that figures provided in the Core Strategy indicate densities of between 30 and 40 dwellings per hectare in the Saggart/Citywest area and it is submitted that these densities are sub optimal. (DRAFTDEVPLAN0341, Eamonn Prenter, Cunnane Stratton Reynolds, Mr Alan Hanly)</p> <p>4. Submission notes need for a housing strategy that attracts families and homeowners to choose Tallaght as their place of residence. (DRAFTDEVPLAN0261, Gerard Stockil, Tallaght Community Council)</p> <p>5. Request to include specific targets for all Local Election Areas (LEAs) in relation to Policy H10 Objective 1 to include a suggested requirement for at least 90% of new houses in Tallaght to be two storey family homes. Submission notes need for a mix of housing types to ensure a wide social demographic are attracted to Tallaght town centre. Submission requests inclusion of specifics on building heights in particular Local Election Areas (LEAs), including additional Objective under Policy H9 (Residential Building Heights) to prohibit further apartments in Tallaght Village or Tallaght Town Centre area and to restrict any apartment blocks in other parts of Tallaght to two stories. Submission also requests omission of Tallaght from Policy H9 Objective 2 and Objective 4 as there is no need for higher buildings in these areas within the lifetime of the Plan, and that all new residential development should be maximum two storeys in height with 80% private residential and the balance private rented apartment. (DRAFTDEVPLAN0261, Gerard Stockil, Tallaght Community Council)</p>	<p>out in accordance with the requirements of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009 (DECLG) including the urban design criteria illustrated under the companion Urban Design Manual - A Best Practice Guide 2009.</p> <p>This is further supported by Section 11.2.0 (Place Making and Urban Design) which commits to ensuring that best practice urban design principles are applied to all new development, based on the principle that well planned and integrated housing, amenities, shops, employment and transport can dramatically enhance the sustainability, attractiveness and quality of an area. This section further cites the requirement to assess development against Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009 (DECLG) and the companion Urban Design Manual - A Best Practice Guide 2009 including the high level aims to address issues including place making, social integration, environmental protection and to shape development in accordance with the 12 urban design criteria.</p> <p>The 12 urban design criteria include the need for development to:</p> <ul style="list-style-type: none"> • integrate with and be informed by its natural surroundings and landscape; • Include activities that contribute to quality of life including shops, facilities and services, • Focus activity on streets with active frontages and ensure that streets and spaces are overlooked. <p>The combined objectives, standards and criteria contained in the Draft Plan and the Ministerial Guidelines on Residential Development therefore address the issues raised in submissions in relation to integrating development with its surrounding environment, avoiding areas of inactivity and achieving natural surveillance.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
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	<p><u>Housing Density</u></p> <p>Policy and standards on housing densities are set out and prescribed under the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009 (DECLG). The Planning Authority must have regard to these Ministerial Guidelines in the performance of its functions, as required under Section 28 of the Planning and Development Act 2000 (as amended).</p> <p>The Ministerial Guidelines recognise that land is a scarce resource that needs to be used efficiently and sets out a range of appropriate residential densities for different contexts based on site factors and the level of access to existing and planned infrastructure and services, including public transport, physical and social infrastructure.</p> <p>This is reflected under H8 Objective 1 and supported under Housing Policy 8 of the Draft Plan 2016-2022, which promotes higher residential densities at appropriate locations and sets out to ensure that the density of new residential development is appropriate to its location and surrounding context. H8 Objective 2 promotes the consideration of higher residential densities at appropriate locations that are close to Town, District and Local Centres and high capacity public transport corridors.</p> <p>The range of densities prescribed under the Ministerial Guidelines including higher residential densities have been applied at a broad level under the Draft Plan's Core Strategy in the calculation of the capacity of zoned lands. This indicates that, in general, there is no requirement to increase densities beyond those prescribed under the Ministerial Guidelines to meet housing need.</p> <p>In terms of the calculation of the capacity of lands for the Moderate Sustainable Growth of Saggart/Citywest, broad net average densities were applied to reflect the varying access to infrastructure and services across this developing settlement within Saggart Village, the outer suburban areas of West Tallaght and the District Centre of Citywest. The density utilised to inform the average net density adhere to that prescribed under the</p>
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	<p>Ministerial Guidelines including that prescribed for lands within walking distance of district centres and high capacity public transport facilities.</p> <p>Furthermore, Section 11.3.0 (Land Uses) of the Draft Plan clarifies that Local Area Plans, SDZ Planning Schemes and Framework Plans will set out more site and area specific density bands in growth areas at a local level. The Fortunestown Local Area Plan 2012 prescribes more exact densities for lands within close proximity to the Luas in Citywest. The specification of exact densities for individual sites under the Draft Plan is therefore neither necessary nor appropriate.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Mix of Dwelling Types</u> The Draft Plan 2016-2022 sets out to ensure that new residential development provides a wide variety of housing types that cater for the diverse housing needs of the County's population and counteract segregation between differing household types. This is supported by the Housing Strategy contained in Schedule 3, which recognises the need to provide a range of house types in all residential developments and to meet different categories of housing need.</p> <p>Housing Policy 10 sets out to ensure that a wide variety of adaptable housing types, sizes and tenures are provided in the County in accordance with the provisions of the Housing Strategy. The housing strategy therefore seeks a mix of dwelling types and tenures throughout the County including family sized houses and home ownership together with other housing typologies and tenure in the interest of creating sustainable communities and counteracting segregation.</p> <p>The Housing Strategy and Development Plan Policy has been drafted up in the context of the projected need for between 32,132 and 39,649 additional homes within the County during the lifetime of the Draft Plan and the</p>
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	<p>findings of the Housing Agency Report '<i>Housing Supply in Ireland's Urban Settlements 2014 – 2018</i>', which projects that 57% of all required households in the Dublin Region will be for one and two person households.</p> <p>The suggested identification of Tallaght for the location of family homes and home ownership would be at variance with this policy, would undermine the viability of development of Tallaght as a Metropolitan Consolidation Town (as identified by the Core Strategy and Regional Planning Guidelines) and would be prejudicial to housing development in other areas of the County.</p> <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Suggested Building Height Limit and Apartments Ban - Tallaght</u></p> <p>H9 Objective 3 of the Draft Plan 2016-2022 sets out to ensure that new residential developments immediately adjoining existing one and two storey housing incorporate a gradual change in building heights with no significant marked increase in building height in close proximity to existing housing (see also Section 11.2.7 Building Height restrictions).</p> <p>The imposition of a blanket two storey height limit on the majority of housing development in Tallaght and a ban on apartment development would place an unreasonable restriction on sites that are suitable for buildings of three storeys or more and a mix of dwelling types and densities including those that are served by high quality community infrastructure and public transport facilities. This includes lands around the Red Luas Line within Tallaght's Urban Centre where residential consolidation is supported under the provisions of the Regional Planning Guidelines for Greater Dublin Area 2010-2022.</p> <p>The Regional Planning Guidelines and the latest CSO Regional Population Projections project significant population growth for the County and identify a need for between 32,132 and 39,649 additional homes during the lifetime of the Draft Plan. Both the Core Strategy contained in the Draft Plan and the</p>
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	<p>Regional Planning Guidelines designate Tallaght as a Metropolitan Consolidation Town where development should take place at a scale that supports the consolidation of the Metropolitan Area and supports key public transport corridors. The projected residential capacity of Tallaght could be significantly reduced by the proposed building height and apartment restrictions and would run contrary to meeting the statutory requirements of the Planning Authority in terms of meeting housing and population targets and directing such growth into the appropriate designated areas of the County.</p> <p>The suggested restrictions would also contradict Section 28 Ministerial Guidelines for the redevelopment of brownfield sites on public transport corridors. The Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009 (DECLG) encourage higher densities in such areas. Meeting this requirement would be highly unlikely with a three storey height limit and a blanket apartment ban.</p> <p>In recent correspondence to the four Dublin Planning Authorities from the Minister for the Environment, Community and Local Government and Minister for Housing, Planning and Co-ordination of Construction 2020 (10th June 2015) it is advised that the availability and affordability of housing is a key planning issue facing Dublin and that the viability of new development including supply will be placed at risk by the insertion of unreasonable or excessive requirements such as that proposed in relation to apartments and building heights.</p> <p>Section 11.2.7 of the Draft Plan contains set of criteria for determining the appropriate building height, namely:</p> <ul style="list-style-type: none"> ▪ The prevailing building height in the surrounding area. ▪ The proximity of existing housing - in residential areas new residential development that adjoins existing two storey housing (backs or sides onto or faces) shall be no more than two storeys in height, unless a separation distance of 35 metres or greater is achieved. ▪ The formation of a cohesive streetscape pattern – including height and scale of the proposed development in relation to width of the
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	<p>street, or area of open space.</p> <ul style="list-style-type: none"> ▪ The proximity of any Protected Structures, Architectural Conservation Areas and / or other sensitive development. <p>This extensive set of criteria ensures a rigorous assessment process is undertaken. Appropriate building heights should therefore be determined on a case-by-case basis, via a site analysis and urban design process, and assessed against the safeguards contained within Section 11.2.7 of the Draft Plan.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
2.3.0 Quality of Residential Development	
<ol style="list-style-type: none"> 1. Promotion of renewable energy within residential development should be considered on a case-by-case basis. Suggested to amend the wording of Policy H11 Objective 2 to encourage new residential developments that take account of energy efficiency and / or renewable energy opportunities including solar energy where appropriate. (DRAFTDEVPLAN0221, Ciara Slattery, New Generation Homes) 2. Submission outlines that H11 Objective 2 is not required as Part L requires it. (DRAFTDEVPLAN0266, Jeff Colley, Temple Media Ltd, trading as Passive House Plus (Eco Build & Upgrade)) 	<p>Chief Executive's Response and Recommendations The submissions in relation to H11 Objective 2 are noted and accepted.</p> <p>Recommendation It is recommended that Policy H11 Objective 2 of the Draft County Development Plan be amended to promote new residential development taking account of energy efficiency and / or renewable energy opportunities including solar energy where appropriate in accordance with Part L of the building regulations.</p>
2.5.0 Rural Housing	
<ol style="list-style-type: none"> 1. Welcomes the removal of the Glenasmole/Bohernabreena Housing and Planning Study, and the Exceptional Housing Need in Dublin Mountain Zone (Policy H33 in 2010-2016 Dev. Plan), in the interest of protecting the Mountain Area. (DRAFTDEVPLAN0057, Paul Cleary) 	<p>Chief Executive's Response and Recommendations HA - Dublin Mountain Zone Criteria Chapter 2 of the Draft Plan 2016-2022 sets out a series of policies and objectives for promoting and managing residential development across the County at a broad strategic level. This includes a Rural Settlement Strategy, which sets out the housing needs criteria for rural housing including within</p>

<p>2. Augment criteria on rural housing in HA - Dublin Mountain Zone to ensure that new development is not obtrusive and is landscaped to merge with existing features. Include additional criteria that requires new development to share entrances. (DRAFTDEVPLAN0212, Doireann Ni Cheallaigh, An Taisce)</p> <p>3. All rural housing policies in respect of the Liffey Valley and within the SAAO area need to be consistent with the limitations on development in the existing SAAO for the Liffey Valley. (DRAFTDEVPLAN0268, Doireann NiCheallaigh, An Taisce)</p>	<p>the High Amenity – Dublin Mountain (HA-DM) zone.</p> <p>The additional criteria that have been suggested for inclusion in relation to the assessment of housing HA-DM zone relates to the more detailed aspects of development at a site specific level. The suggested requirements are more relevant to Sections 11.3.4 (Rural Housing) and 11.5.5 (Landscape) in Chapter 11 of the Draft Plan, which sets out standards and criteria for rural housing standards that:</p> <ul style="list-style-type: none"> ▪ Requires the submission of a comprehensive site analysis and character appraisal ▪ Requires development proposals in high amenity zones and sensitive landscapes to include a Landscape Impact Assessment to assess visual impact and to outline mitigation measures to reduce the visual impact of the development. ▪ Discourages the positioning of dwellings in elevated locations in the landscape. ▪ Requires retention of the natural slope and landcover of sites. ▪ Appropriate tree and hedgerow planting schemes. ▪ The retention of traditional field and roadside boundaries. ▪ Minimisation of driveway and parking areas. <p>The suggested additional requirements for insertion into the Draft Plan are therefore already covered in the relevant sections in Chapter 11 of the Draft Plan. The submission in relation to the application of housing needs criteria in the Glenasmole/Bohernabreena area of the HA-DM zone is noted.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Limitation on Development in High Amenity – Liffey Valley (HA-LV) Zone</u> H24 Objective 1 (Rural Housing in HA- Liffey Valley and Dodder Valley) and HCL 10 Objective 7 (Liffey Valley and Dodder Valley) contained in the Draft Plan 2016-2022 restricts development in the Liffey Valley to:</p> <ul style="list-style-type: none"> ▪ The replacement/redevelopment of an existing structure/uses
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	<ul style="list-style-type: none"> ▪ The extension of an existing structure ▪ The provision of a domestic garage, greenhouse, shed or similar non-residential structures ▪ Development that relates to agriculture or recreation <p>These restriction corresponded with the limitations of development contained in the Liffey Valley Special Amenity Area Order.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
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Chapter 2 Summary of Recommended Amendments to the Draft Plan

Section	Response Issue	Recommendation
2.1.0 Housing Strategy	Edmondstown SLO	Amend H3 SLO1 (Edmondstown – former Kilmashogue House) to facilitate low density residential development at Edmondstown at a net density of not more than 12 dwellings per hectare and to promote housing for older people (nursing home, independent and semi-independent) as a fully integrated part of such development with an increased density of not more than 20 dwellings per hectare to apply to independent and semi-independent housing for older people. The SLO should state that all residential development including housing for older people shall be integrated within a sustainable residential neighbourhood that is served by shared public open space, community and local facilities. It should also be stated that permissible densities may be increased in accordance with the relevant ministerial guidelines where issues of accessibility have been fully resolved in an appropriate manner.
2.1.0 Housing Strategy	Housing Need and Part V	Amend Section 2.1.0, Housing Policy 1, H1 Objective 2 and the Housing Strategy contained in Schedule 3 of the Draft County Development Plan to reflect the recent amendments to Part V of the Planning and Development Act (as amended) including changes requiring that not more than 10% of housing should be social/affordable, and the prescribed mechanism to fulfil the Part V obligations. The Interim Housing Strategy should also be amended to a finalised Housing Strategy that reflects the changes to Part V. The stated intention to carry out a review of the Interim Housing Strategy should also be removed from the Draft County Development Plan.
2.3.0 Quality of Residential Development	General	Amend Policy H11 Objective 2 to promote new residential development taking account of energy efficiency and / or renewable energy opportunities including solar energy where appropriate in accordance with Part L of the building regulations.

CHAPTER 3 - COMMUNITY INFRASTRUCTURE

<p>3.0 Introduction</p> <ol style="list-style-type: none"> 1. Requests the strengthening of general community facilities in the Balgaddy area such as youth club/facilities, sports club, playground area, green area and community facilities and services. (DRAFTDEVPLAN0043, Lorraine Hennessey, Balgaddy Working Together Group) 2. Supports the provision of services and facilities in tandem with housing developments. (DRAFTDEVPLAN0043, Lorraine Hennessey, Balgaddy Working Together Group) 	<p>Chief Executive's Response and Recommendation</p> <p>The Council recognises that the provision of good quality community facilities in both existing and developing areas is a key element in the development of sustainable communities across the County. Chapter 3 of the Draft Plan 2016-2022 details policies and objectives relating to the provision of community facilities and centres (Section 3.2.0 and 3.3.0), sports facilities and centres (Section 3.9.0), and open space (Section 3.13.0) across the County. In addition, support for the delivery of community services and facilities in tandem with residential development is provided for in objectives under Policy C1, Section 3.3.0 of the Draft Plan.</p> <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p>
<p>3.2.0 Community Facilities</p> <ol style="list-style-type: none"> 1. Request for land on which to build a new Scout Den to serve Lucan area. Submission includes request for meeting in relation to discussing options regarding same. (DRAFTDEVPLAN0139, Adrian Short, 142nd Esker and 180th Lucan South Scouts DRAFTDEVPLAN0121, scott greenwood, Lucan Scouts - 180th DRAFTDEVPLAN0149, Martin Finegan, 142nd Esker and 180th Lucan South Scouts) 2. Requests the building of a premises for the use of the scouting groups of Esker, Foxborough, Balgaddy, Earlsfort and surrounding areas, as they have to rent several different buildings to house their activities and meetings. The facilities could also be used by other community groups. (DRAFTDEVPLAN0129, Noel Doherty) 	<p>Chief Executive's Response and Recommendation</p> <p>The Chief Executive notes the submissions in relation to community facilities. The Chief Executive responses are addressed under the following headings:</p> <ul style="list-style-type: none"> ▪ General provision ▪ Established sports clubs, interest/leisure clubs and youth cafés ▪ Facilities for younger and older people ▪ Libraries <p><u>General provision</u></p> <p>It is the policy of the Council to ensure all South Dublin communities have access to an appropriate range of community facilities in existing and developing areas across the County. Policy C1 of the Draft Plan 2016-2022 makes provision for an assessment of community floorspace</p>

<p>3. Need to provide facilities in Balgaddy according to a hierarchy of need following analysis of existing and proposed floorspace,/facilities within the community and countywide, and assess and plan for current and future community needs. (DRAFTDEVPLAN0274, Lorraine Hennessy, Balgaddy Working Together Group)</p> <p>4. Submission outlines the lack of a plan to develop a new community centre/facility for young people in the Adamstown/Esler/Lucan South area in the Draft Plan. This area has a high number of youth groups providing excellent services to the young people of the area yet there is a distinct lack of community space available for their use. Submission would like to see the building of a scout den in partnership with the 142nd and 180th Dublin Scout Groups in the Adamstown/Esler/Lucan South area included as an objective. (DRAFTDEVPLAN0158, Brian Smith, 142nd Dublin (Esler) Scout Group DRAFTDEVPLAN0177, Lorraine Kelly, 180th Lucan South Scout Group)</p> <p>5. Submission from Knocklyon Network requests that the Council provide for a facility comparable to Ballyroan Community Centre, a 'Digital Hub' and a 'sustainability learning campus' in Knocklyon. It is submitted that the provision of the latter facility is supported by a range Draft County Development Plan policies and objectives. (DRAFTDEVPLAN0180, Eugene Barrett, Knocklyon Network Ltd.)</p> <p>6. Submission on behalf of Knocklyon Network proposes that the Development Plan should provide the following for people in the 'over 55' age bracket in Knocklyon: upgrading of the youth and community centre, use of schools, improved walks, improved transport facilities, a library and a register of facilities. (DRAFTDEVPLAN0180, Eugene Barrett, Knocklyon Network Ltd.)</p> <p>7. The current lack of community facilities in Lucan needs to be addressed prior to development of the Clonburris SDZ lands. (DRAFTDEVPLAN0194, Frances Fitzgerald, Minister for Justice and</p>	<p>needs in the County, and includes Actions relating to an analysis of same to plan for current and future community needs, as developed through the Local Economic and Community Plan (LECP). While preliminary work has been carried out in this regard, this work will continue over the lifetime of the Plan.</p> <p>Section 3.14.0 of the Draft Plan details community infrastructure, including community floorspace, to be considered as part of Section 48 Development Contribution Scheme; however, this list is not exhaustive with regard to community infrastructure provision during the lifetime of the Draft Plan. It is also noted that the provision of additional facilities will require the availability of the necessary finances. Section 48 contributions will not finance all required facilities, therefore financial assistance from national resources is essential in this regard.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Established sports clubs, interest/leisure clubs and youth cafés</u> Policy C1 of the Draft Plan 2016-2022 includes objectives to support the provision of new and improved community facilities in established areas of the County, the provision of community facilities in developing areas in tandem with residential development, and the clustering of facilities such as community centres, sports and leisure facilities and open spaces to create multi-purpose community hubs. In addition, Policy C7 includes objectives relating to the promotion and support of developing minority sports with indoor and outdoor spaces for same, and the provision of permanent spaces for well-established sports clubs in the County. The identification of specific sites or allocation of premises for such uses or named clubs, however, is beyond the scope of the strategic land use function of the County Development Plan.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be</p>
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<p>Equality)</p> <p>8. Request for provision of a new Scout Den with surrounding green space to serve Lucan area and wider community. (DRAFTDEVPLAN0157, Bernard Byrne, Dublin City Public Libraries.)</p> <p>9. Saggart/Citywest is a rapidly growing area with a population comparable to large towns but has a serious deficit in Community infrastructure. The Fortunestown LAP promotes the provision of a Library and this is not reflected in the Draft Development Plan. C2 Objective 2 should therefore be amended to list Saggart/Citywest as an area requiring a library. (DRAFTDEVPLAN0223, Maria Jose & Patrick Diez, N/A)</p> <p>10. Request to identify specific locations for Youth Café, relocated local boxing club and basketball courts, and Men's Shed group in Ballyboden. (DRAFTDEVPLAN0383, Angela O'Donoghue, Glendoher & District Residents Association)</p> <p>11. Submission noted need for support of age friendly initiatives and facilities for older people in areas of aging population. (DRAFTDEVPLAN0170, Neville Graver, Rathcoole Community Council Limited)</p>	<p>amended.</p> <p><u>Facilities for younger and older people</u> It is the policy of the Council to ensure that community facilities and buildings are adaptable and suitable for use by all age cohorts, with objectives under Policy C1 of the Draft Plan 2016-2022 supporting same. Policy C1, Objective 7 also makes specific provision for additional youth cafes in areas with high population of young adults, utilising existing buildings which can be adaptable to youth programme facilities.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Libraries</u> The delivery of public libraries within the County comes under the remit of the South Dublin Library Development Plan which, as noted under Section 3.4.0 of the Draft Plan 2016-2022, sets out the framework for the delivery of library services in the County. The Libraries Plan sets out a number of Actions for projects throughout the County in both existing and developing areas in South Dublin, including areas subject to LAPs. Policy C2 of Draft Plan 2016-2022 provides support for the delivery of the Actions of the South Dublin Libraries Plan 2012-2016, and any future Libraries Plan. Policy C2 Objective 1 supports the implementation of the South Dublin Library Development Plan 2012-2016 (and any future Plan) including a Digital Hub at Palmerstown; it is noted that similar future developments would be identified under the Library Development Plan and is not a matter for the County Development Plan.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
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<p>3.3.0 Community Centres</p> <ol style="list-style-type: none"> 1. Requests the prioritisation of a new community centre at the Bush Centre at Balgaddy to incorporate the community garden. (DRAFTDEVPLAN0043, Lorraine Hennessey, Balgaddy Working Together Group) 2. Need for a community centre in the Adamstown area to cater for adults and children of all ages, all nationalities and all abilities. (DRAFTDEVPLAN0202, Ian McLean) 3. - Request to include the Balgaddy Community Garden specifically in the wording of C1 SLO1. - Request retention of the exiting Balgaddy Community Garden as a valuable community facility, that the Community Garden be included as part of the countywide survey of community floorspace, and that the community be involved in consultation and the decision-making process regarding the Garden; with wording of C1 SLO1 to reflect same. - Request that the Plan includes the provision and delivery of a Community Centre in Balgaddy by SDCC on lands in public ownership if site of the Bush Centre, objective C1 SLO1, is not a viable option. (DRAFTDEVPLAN0274, Lorraine Hennessey, Balgaddy Working Together Group) 	<p>Chief Executive's Response and Recommendation</p> <p><u>Bush Centre, Balgaddy</u> Policy C1 SLO1 of the Draft Plan 2016-2022 relates specifically to supporting the provision of a community centre for the Balgaddy/South Lucan Area on the site of the existing Bush Centre, developed in partnership with existing service providers in the area, to meet the needs of the community. In addition, an Action pertaining to a strategy for the provision of community gardens throughout the County, including the Balgaddy/South Lucan Area, is provided for under Policy C12 of the Draft Plan relating to Open Space.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Adamstown</u> It is the policy of the Council to continue to implement the approved Planning Schemes for Adamstown SDZ, including community facility provision. In addition, Section 3.14.0 of the Draft Plan 2016-2022 details community infrastructure delivery in both existing and developing areas, including the provision for a new library and community centre in Adamstown, to be considered as part of the Section 48 Development Contribution Scheme.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>3.9.0 Sports Facilities and Centres</p> <ol style="list-style-type: none"> 1. Request for swimming pool, upgrade of leisure centre and public basketball courts in Lucan. (DRAFTDEVPLAN0006, Niamh Kinsella) 	<p>Chief Executive's Response and Recommendation The Chief Executive notes the submissions in relation to sports facilities and centres. The Chief Executive responses are addressed under the</p>

<p>2. Lucan Harrier and Athletic Club welcome the inclusion of an athletic track under 3.9.0 Objective C7 of the Draft Plan, built to a national standard, in this draft County Development plan 2016 - 2022 and the commitment shown by SDCC to the development of athletics in the area. (DRAFTDEVPLAN0037, Will Byrne, Lucan Harrier & Athletic Club)</p> <p>3. Submission supports the objectives C1 Objective 3, C7 Objective 7 and C7 SLO 1 in the Draft Plan in relation to the clustering of community facilities, the provision of a swimming pool and district level community hubs. Submission requests prioritisation of the development and that funds should be ring fenced for the development as a critical issue in terms of sports and leisure, and associated tourism spinoff, for Lucan as a community. (DRAFTDEVPLAN0131, Helen Farrell, Supporters of #Pool4Lucan)</p> <p>4. Submission relates to existing GAA sports club in Lucan, and queries appraisal of existing community facility provision in the County (under Section 3.2.0 Community Facilities) which states that the distribution and level of provision of playing pitches is considered adequate. Submission states that the level of demand exceeds existing provision, and identifies 3 sites as suitable locations for such sports uses, including pitches and clubhouse facilities:</p> <ul style="list-style-type: none"> - Lands adjacent to Lucan Golf Club in Liffey Valley (HALV zoning). - Lands adjacent to the new development of St. Andrew's NS in Liffey Valley (HALV zoning). - Lands in Griffeen Park with Open Space (OS zoning). <p>Submission requests review of use matrixes for zoning objectives of identified sites if not compatible with proposed sports uses. (DRAFTDEVPLAN0217, Eoin Ó Murchú, Na Gaeil Óga CLG DRAFTDEVPLAN0218, Eoin Ó Murchú, Na Gaeil Óga CLG DRAFTDEVPLAN0219, Eoin Ó Murchú, Na Gaeil Óga CLG)</p>	<p>following headings:</p> <ul style="list-style-type: none"> ▪ Lucan area provision/Leisure Centre, ▪ Pitch provision, clustering and co-location/sharing of facilities ▪ Cricket facilities ▪ Institutional lands ▪ Stadia <p><u>Lucan area provision/Leisure Centre</u> The provision of a sports and leisure facility/centre for Lucan, including a swimming pool, is specifically referenced under Section 3.2.0 Table 3.1 of the Draft Plan 2016-2022 relating to Existing and Planned Community Facility Provision, and under C7 Objective 7. Section 3.14.0 of the Draft Plan also details community infrastructure, including a sports facility with swimming pool in Lucan, to be considered as part of Section 48 Development Contribution Scheme.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Pitch provision, clustering and co-location/sharing of facilities</u> With regard to pitch provision, the Environment, Water and Climate Change Department is currently reviewing all the existing playing pitches within the County and analysing their usage such as frequency to establish how efficiently the space can be used in the future. This research is ongoing and it will highlight where supply is and where deficits are as well as inform future playing pitch provision where required.</p> <p>In this regard, it is noted that C7 Objective 11 of the Draft Plan 2016-2022 provides for a review of the County's playing pitches. Policy C7 Objective 2 of the Draft Plan also states support for the provision of multi-purpose sports halls and all weather playing pitches in Moderate</p>
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<p>5. Submission on behalf of Adamstown Cricket Club requests inclusion of specific references to cricket and cricket facilities in proposed C7 Objective 2, C7 Objective 5, and C7 Objective 6; and inclusion of two additional Objectives under Community Infrastructure Policy 7 relating to provision of playgrounds with at least two cricket pitches and permanent building in Adamstown. (DRAFTDEVPLAN0259, Olag Sivanantham, Adamstown Cricket Club)</p> <p>6. Requests a general presumption against the development of institutional lands where such lands are being used for sporting/ recreational purposes, except in exceptional circumstances. (DRAFTDEVPLAN0360, Jim Brogan, Jim Brogan, Dublin GAA County Board)</p> <p>7. Requests that C9 Objective 7 be amended to include reference that engagement is encouraged and supported between schools and sports clubs/organisations in the local community to enable provision on a partnership basis. (DRAFTDEVPLAN0360, Jim Brogan, Jim Brogan, Dublin GAA County Board)</p> <p>8. Submission outlined the importance of all-weather playing facilities/ pitches for Dublin GAA and envisages the creation of a cluster of facilities at strategic locations within the larger parks throughout the County. Submission requests the consideration of the provision of these facilities include consultation at pre-design stage with prospective stakeholders (DRAFTDEVPLAN0360, Jim Brogan, Jim Brogan, Dublin GAA County Board)</p> <p>9. Submission from Dublin GAA County Board outlining that it is a key strategic objective of the Dublin GAA 2011 - 2017 Strategy to provide a</p>	<p>Sustainable Growth Towns. In addition, the Actions under Policy C7 provide for the preparation of a comprehensive study during the lifetime of the Plan to examine existing facilities, club structures, demographic data and other information to identify future needs for sports and leisure development in the County as developed through the LECP.</p> <p>With regard to clustering, co-location and sharing of playing pitches, it is noted that Policy C1 Objective 3 of the Draft Plan specifically refers to support for the clustering of community facilities such as community centres, sports and leisure facilities and open spaces to create multi-purpose community hubs. C7 SLO1 also provides for support of District Level Community Hubs in the Metropolitan Consolidation Towns of Tallaght, Lucan and Clondalkin, with such hubs incorporating all weather playing pitches. In addition, Policy C7 Objective 4 of the Draft Plan encourages the co-location of community and sporting facilities, with Policy C9 Objective 7 providing for the promotion and support of schemes that facilitate the shared use of school facilities, such as all-weather pitches, for community use outside school hours.</p> <p>One submission received identified 3 specific sites for sports uses, including pitches and clubhouse facilities. It is noted that the sites identified in this submission relate to locations subject to zoning HA-LV and OS. The identification of specific sites or allocation of premises for named clubs is beyond the scope of the County Development Plan. Furthermore, the acquisition of lands and allocation of public open space including pitches is also beyond the strategic land use function of the County Development Plan.</p> <p>The wording of the Policies, Objectives, SLOs, Actions and zoning matrixes detailed above are considered adequate and appropriate with regard to the protection of existing sporting facilities in established built up areas.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be</p>
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<p>medium sized stadium with a seated capacity of c25,000 in Dublin. Submission requests:</p> <ul style="list-style-type: none"> -That the Council commits to facilitating the provision of the stadium at a marco level -The Council amends the zoning tables to include a 'stadium' category to ensure that the zoning tables would not present any material obstacles to the stadium project. <p>(DRAFTDEVPLAN0360, Jim Brogan, Jim Brogan, Dublin GAA County Board)</p>	<p>amended.</p> <p><u>Cricket facilities</u> Policy C12 Objective 7 of the Draft Plan 2016-2022, provides specifically for the support and facilitation of facilities for alternative recreational activities, including cricket pitches. In addition, Policy C7 of the Draft Plan includes objectives relating to the promotion and support of developing minority sports with indoor and outdoor spaces for same, and the provision of permanent spaces for well-established sports clubs in the County. The identification of specific sites or allocation of premises for such uses or named clubs, however, is beyond the scope of the strategic land use function of the County Development Plan.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Institutional lands</u> Policy H8 Objective 3 of the Draft Plan 2016-2022, provides for the development of institutional lands, subject to the retention of their open character and provision of high quality open space in accordance with the requirements of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009 (DECLG). Section 11.3.1(iii) of the Draft Plan also states that a minimum requirement of 20% open space is recommended within new residential and mixed use developments on institutional lands to maintain an open setting. The provisions of C12 Objective 8, which relates specifically to the retention of lands with established recreational uses as open space unless proximate alternatives can be agreed by the Council, is also noted.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
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	<p><u>Stadia</u></p> <p>With regard to the submission received from the Dublin GAA County Board, it is noted that the identification and development of a specific site/premises for a sporting venue project, in the absence of the appropriate survey work and study, would be overly prescriptive and premature; in addition, it would be beyond the strategic land use function of the County Development Plan. The Council is committed to ensuring that an appropriate range of sports facilities are provided in all communities, taking account of population profiles and growth targets of same. Policy C7 of the Draft Plan 2016-2022 provides specifically for sports facilities and centres, with objectives and associated Actions detailed in relation to same.</p> <p>It is, however, recommended that 'Stadium' be added to the Definition of Use Classes in Schedule 5 of the Draft Plan and this use integrated into the Land Use Zoning tables where appropriate and in accordance with relevant policies and objectives of the Draft Plan.</p> <p>Recommendation</p> <p>It is recommended that the Draft County Development Plan be amended to include the addition of 'Stadium' in the Definition of Use Classes in Schedule 5 of the Draft Plan, and the Land Use Zoning tables amended to include same where appropriate and in accordance with relevant policies and objectives of the Draft Plan</p>
<p>3.11.0 Educational Facilities</p>	
<p>1. Recommendation for Policy C9(a), Policy C9(b) and Policy C9 Objective 8 to:</p> <ul style="list-style-type: none"> - State all levels and types of school, ie pre-school, primary, secondary and specialised schools for children with Autism and complex needs, within wording of the Objective/s. - Include mandatory provision for SDCC to consult and/or review with 	<p>Chief Executive's Response and Recommendation</p> <p>The Chief Executive notes the submissions in relation to educational facilities. The Chief Executive responses are addressed under the following headings:</p> <ul style="list-style-type: none"> ▪ Special education and Autism Spectrum Disorder (ASD) class provision

<p>the DES and public consultation regarding the assessment of local need for ASD classes in mainstream schools and/or special needs schools for children with ASD and complex needs in existing schools, in schools proposed for extension and in proposed schools prior to grant of planning permission.</p> <ul style="list-style-type: none"> - Include consideration of the lifespan of ASD class placement when planning for future ASD classes. - Include a mandatory requirement for all secondary schools to include ASD class facilities based on local need and feeder primary/special school numbers. <p>Specifications for school and classroom design also noted. (DRAFTDEVPLAN0064, Nicola Whelan, Lucan Autism Network)</p> <ol style="list-style-type: none"> 2. Objection to proposals for 2 schools on green space off Ballycullen Road on basis of absence of need. (DRAFTDEVPLAN0061, Annette O'Neill) 3. Need for further provision of schools in the Firhouse area, particularly secondary schools. (DRAFTDEVPLAN0273, Anne-Marie Dermody, Councillor/Solicitor) 4. Proposed schools at Carriglea will draw a significant amount of traffic. (DRAFTDEVPLAN0224, Nuala Canavan) 5. Proposed school at Carriglea will contravene DES's own recommendations on the transportation of Primary School children. (DRAFTDEVPLAN0227, Frank Canavan) 6. Submission requests that the school objective in Rathcoole adjacent to Rathcoole Park be reinstated due to the anticipated and planned population increase in the area. (DRAFTDEVPLAN0162, Suzanne McClure, Brock McClure Consultants, Ecotec Construction Ltd) 7. Department Education & Skills request that paragraph 2 under Section 	<ul style="list-style-type: none"> ▪ Department of Education and Skills submission ▪ School site identification and designation ▪ Third level institutions (Priory Institute) <p><u>Special education and ASD class provision</u> Policy C9 Objective 8 of the Draft Plan 2016-2022 relates specifically to the provision of special education and Autism Spectrum Disorder (ASD) classes in schools across the County. In addition, it is noted that the Council will continue to work with the Department of Education and Skills to provide much needed accommodation, including those for Special Education and ASD classes. The provision of specific classrooms for children's needs is a matter that needs to be determined by the Department of Education and Skills prior to the submission of proposals for development and is therefore not a matter for the County Development Plan.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Department of Education and Skills submission</u> The submission from the Department of Education and Skills requests the inclusion of additional text in the narrative of Section 3.11.0 of the Draft Plan 2016-2022 regarding Educational Facilities. The additional text, which relates to issues including the role of the Department of Education and Skills in the identification and acquisition of school sites in the County, has been considered and is accepted.</p> <p>Recommendation It is recommended that Section 3.11.0 of the Draft County Development Plan be amended to include additional text in the narrative of Section 3.11.0.</p> <p><u>School site identification and designation</u></p>
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<p>3.11.0 Educational Facilities is revised to include the following text: 'The Department of Education and Skills will continue to work closely with South Dublin County Council under the Memorandum of Understanding in relation to the identification and acquisition of school sites'. Submission requests that paragraph 3 under Section 3.11.0 Educational Facilities is revised to include the following text: 'A possible requirement for further provision is also identified in the Lucan and Dublin 24 areas particularly, although other areas may also require some level of additional provision'.</p> <p>Submission also requests that following text regarding primary school requirements be included: 'The Department reviews demographic data on an ongoing basis, and any requirements for additional accommodation at primary level up to 2026 in the Development Plan area, either via new schools or expansion of existing schools, will be identified through that process. It is likely that additional provision will be required at primary level within the Development Plan area, over the lifetime of this plan'. In addition, submission requests that any existing educational zonings or reservations made under the current Plan or LAPS would be maintained in the South County Dublin Development Plan 2016-2022. (DRAFTDEVPLAN0156, Clare Connolly, Department of Education & Skills)</p> <p>8. Submission requests that proposed location of two primary schools at Ballycullen Drive be changed and suggests that alternative sites be considered for the PS designation. The reasons outlined include: -Zoning of the area is to preserve open space -Negative impact on the recreational activity of Firhouse Carmel FC due to the loss of the best playing pitch. -Lack of demonstrable need for two additional schools at this location -School are intended to satisfy car borne pupils -Local opposition from residents and community groups (DRAFTDEVPLAN0386, John Stenson, Firhouse Carmel FC)</p>	<p>As noted under Section 3.11.0 of the Draft Plan 2016-2022, the Department of Education and Skills is responsible for the delivery of educational facilities and services. South Dublin County Council has worked with the Department of Education and Skills since 2012 under a nationally agreed Memorandum of Understanding (MoU), to proactively identify and acquire sites for new primary and post-primary schools, and to support the Department's Schools Building Programme. The Department of Education and Skills reviews demographic data on an ongoing basis, with requirements for additional schools accommodation identified through same. It is noted that the list of schools detailed in Section 3.14.0 of the Draft Plan was provided by the Department of Education and Skills, arising from their latest projections on the need for school places and provision of new schools in the County.</p> <p>The Department of Education and Skills will commence a new phase of school building during the period 2016-2022, with the location of school sites identified on Draft Plan Maps based on the assessment process outlined above. Planning applications for new or extended school facilities in the County will be assessed on a case by case basis and on their merits with regard to issues including identified school sites, compliance with relevant policies, objectives and standards contained within the Plan, compatibility of proposed land use with the zoning objective of subject site and capacity of existing school facilities.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Third level institutions (Priory Institute)</u> The Institute of Technology Tallaght (ITT) is nationally recognised as a centre for research and innovation. While other higher level educational institutions in the County are not specifically referenced in the Draft Plan 2016-2022, their function and position within the hierarchy of educational facilities within the County is recognised, with Section 3.11.2 of the Draft Plan providing for the support of all third and fourth level</p>
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<p>9. Submission requests that the Section 3.11.2 and ET1 Objective 9 in Section 4.3.1 be amended to include the Priory Institute as an educational institution within the County. (DRAFTDEVPLAN0324, Raymond O'Malley, Kiaran O'Malley & Co.Ltd, Dominican Community at St. Mary's Priory, Tallaght)</p> <p>10. Requests the reinstatement of the second proposed primary school on the Gunny Hill site, as per the Ballycullen / Oldcourt LAP, following the material alteration to increase the site size to accommodate a two schools. (DRAFTDEVPLAN0387, Tom Gurrie)</p> <p>11. Requests removal of C9 Objective 10 " To build secondary school in Firhouse / Ballycullen in the lifetime of the plan" as there are no figures documented within the plan to justify this development. The Department of Education have also commented that such a specific reference is not helpful in a development plan. This proposal is also in conflict with C9 Objective 2 which specifically includes Knocklyon with Ballycullen / Firhouse (DRAFTDEVPLAN0387, Tom Gurrie)</p>	<p>educational facilities throughout the County.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>3.12.0 Healthcare Facilities</p>	
<p>1. - Request for Specific Local Objective to remove barriers preventing the planned pedestrian access and permeability to disability services and shops in Ross Court Local Neighbourhood Centre. - Request to continue to promote social inclusion through the planning process by requiring the provision of neighbourhood and community facilities within walking distance of and concurrent to new residential development. - Request to make provision for the economic development of Ross Court and Griffeen Local Neighbourhood Centres, with a level of service provision that meets the needs of the community, and to promote further retail and enterprise development in both areas over Ballyowen Castle which is fully developed. - Request to facilitate delivery of a Primary Health Centre in Ross Court, as an alternative to the already overdeveloped Ballyowen Castle site, to enhance the viability and</p>	<p>Chief Executive's Response and Recommendation <u>Rosse Court Centre</u> The identification of specific sites for healthcare and community facilities is beyond the scope of the strategic land use function of the County Development Plan. In addition, the County Development Plan process does not have a function with regard to the selection of occupiers into any retail centres. Is it is noted, however, that having regard to the submission received, it is considered that a local centre zoning should be applied at Rosse Court to reflect the cluster of existing units and provide a policy framework and suitable location for the provision of additional services in the area. The provision of a Local Centre zoning objective provides a policy context for the delivery of community facilities and facilitates the economic development and provision of a Primary</p>

<p>sustainability of the local, economic and social development of Ross Court retail centre as a community hub. (DRAFTDEVPLAN0274, Lorraine Hennessy, Balgaddy Working Together Group)</p> <p>2. Submission seeks inclusion of an SLO to support and facilitate the appropriate future development of Peamount Healthcare for rehabilitation and continuing care facilities. Submission requests inclusion of same on the basis that:</p> <ul style="list-style-type: none"> - the SDCC Development Plan 2004-2010 and 2010-2016 included SLOs supporting the development of Peamount Healthcare for rehabilitation and care facilities, - Peamount currently performs a very specific and valuable function in the County in terms of the provision of rehabilitation and continuing care services, with a future vision to ensure that Peamount will be strategically placed to become an international leader in delivering and promoting rehabilitation and continuing care services, enabling adults to live more independently, - if appropriately developed, the expertise Peamount has in its particular areas of activity could readily be transferred to other areas of health and social care, - Peamount Healthcare, in conjunction with the HSE, has appointed a design team to complete a master plan for the development of Peamount, which would be supported and facilitated by the requested SLO. <p>(DRAFTDEVPLAN0200, Robert Keran, John Spain Associates, Peamount Healthcare DRAFTDEVPLAN0344, John Spain Associates, John Spain Associates, Peamount Healthcare)</p>	<p>Health Centre. Under the Local Centre zoning objective, Primary Health Centre, Community Centre, Doctor/ Dentist, Enterprise Centre, Shop-Neighbourhood and Shop- Local are listed as Permitted in Principle.</p> <p>Recommendation</p> <p>It is recommended that the County Development Plan Maps be amended to include a Local Centre (LC) zoning at Rosse Court (see also Section 5.6.0 Retail Centres).</p> <p><u>Peamount Healthcare facility</u></p> <p>Having regard to the zoning objective of lands at Peamount Healthcare, and context of the subject site relative to settlements in the County, it is considered that the Peamount Healthcare facility represents an established but non-conforming use. Section 11.1.0 of the Draft Plan 2016-2022 details the land use zoning objectives of the Draft Plan, with a definition of use classes included in Schedule 5 of the Draft Plan. Section 11.1.1(vi) of the Draft Plan notes that there are instances throughout the County where land uses do not conform with the zoning objective of a site, which include instances where such uses;</p> <ol style="list-style-type: none"> 1. were in existence on 1st October 1964 (i.e. prior to planning legislation) or 2. have valid permission or 3. have no permission and may or may not be the subject of enforcement proceedings. <p>Section 11.1.1(vi) of the Draft Plan notes that development proposals that relate to uses referred to under categories 1 and 2, particularly those that would intensify non-conforming uses, will be permitted only where the proposed development would not be detrimental to the amenities of the surrounding area and would accord with the principles of proper planning and sustainable development. This includes the integration of land use and transport planning</p> <p>The function of the Peamount Healthcare facility and its position within the hierarchy of community healthcare infrastructure within the County is recognised. Notwithstanding this, having regard to the established use</p>
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	<p>of the subject site, in healthcare use prior to 1963, and the listing of 'Primary Health Care Centre' as open for consideration in the proposed RU zoning objective of the subject lands, it is considered that the provisions of Section 11.1.1(ii) of the Draft Plan adequately accommodate the development of the facility for a healthcare use, subject to assessment. As such, it is considered that an SLO is not required in this instance to facilitate the development of the Peamount facility given the established pre 1963 nature and planning history of the site.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
3.13.0 Open Space Management & Use	
<ol style="list-style-type: none"> 1. Request that an area within the County be developed for motorcross/scrambler track. Possibly within an industrial estate. (DRAFTDEVPLAN0026, Gary Tyrrell, Gary Tyrrell) 2. Requested that the lands designated SL01 on Map 4 of the development plan should be used in their entirety by the Council for Community Infrastructure (C) in line with Policy 12 Open Space ref: C12 SL01 on page 63 of the Development Plan. (DRAFTDEVPLAN0084, Peter Keogh, Lucan Pitch & Putt Club) 3. The South Dublin County Council Development Plan should make additional provision for outdoor gyms in the Dublin 12/6W area. Locations such as Dangan Park, Muckross Green, Priory Walk/Hall, Wainsfort Manor Drive and the Green Area between Fortfield Road and Wainsfort Grove should be considered as long as there is proper community consultation and a demand for them in the aforementioned areas to increase residential amenities and facilities for the area. (DRAFTDEVPLAN0220, Paul Hand) 4. Submission on behalf of Knocklyon Network raises concern that 	<p>Chief Executive's Response and Recommendation The Chief Executive notes the submissions in relation to Open Space Management & Use. The Chief Executive responses are addressed under the following headings:</p> <ul style="list-style-type: none"> ▪ Motor-cross and biking facilities ▪ C12 SLO1/Beattie's Field, ▪ Parks equipment and facilities, ▪ Carrigmore Park ▪ Protection of existing parks ▪ Equine facilities <p><u>Motor-cross and biking facilities</u> C12 Objective 7 of the Draft Plan 2016-2022, makes provision for the support and facilitation of facilities for alternative recreational activities, such as BMX tracks, skateboard parks and motor-cross racing. The identification of specific sites for such recreational facilities and amenities in each park, however, is beyond the scope of the strategic land use function of the County Development Plan.</p> <p>Recommendation</p>

<p>facilities in the Dodder Valley Park are inferior compared to other regional parks. It is requested that the following be provided for: separate pedestrian and cycle routes, opening up the river for views, performance space, pedestrian access near Delaney's Pub, graffiti competitions, flood control, signage for local amenities, upgrade of Spawell Bridge balustrades, seating, artworks, bicycle parking, compatible uses for Victory Centre, sealing of Bohernabreena landfill, farmers market, bike rental and servicing, picnic facilities, playgrounds, allotments, increased biodiversity, fishing facilities, artificial lakes, energy producing dams/weirs, wind power, litter and dog fouling management, exercise equipment, education/interpretive centre, native planting, native flora and fauna and a walled perimeter to the park. (DRAFTDEVPLAN0180, Eugene Barrett, Knocklyon Network Ltd.)</p> <p>5. Include Carrigmore Park in list of District Parks to reflect its designation in the Fortunestown LAP and its central role and ensure for its proper management and maintenance. (DRAFTDEVPLAN0223, Maria Jose & Patrick Diez, N/A)</p> <p>6. Submission from Dublin GAA County Board requests that the Plan include a commitment to the provision of adequate and appropriate dressing room facilities and other essential ancillary facilities (DRAFTDEVPLAN0360, Jim Brogan, Jim Brogan, Dublin GAA County Board)</p> <p>7. In relation to existing facilities in public open space, submission of Dublin GAA County Board requests modification of C12 Objective 8 to be more assertive with regard to the protection and enhancement of existing sporting facilities in established built up areas. (DRAFTDEVPLAN0360, Jim Brogan, Jim Brogan, Dublin GAA County Board)</p> <p>8. Submission requests scoping for provision of coffee shop and toilet facilities in main County parks. (DRAFTDEVPLAN0261, Gerard Stockil, Tallaght Community Council)</p>	<p>It is not recommended that the Draft County Development Plan be amended.</p> <p>C12 SLO1/Beattie's Field It is a requirement under the Planning and Development Act 2000 (as amended) for the County Development Plan, including its Core Strategy, to be consistent with the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 and to ensure that sufficient and suitable lands are zoned to meet the population and housing requirements for the County. The Settlement Strategy contained within the Regional Planning Guidelines (RPGs) identifies Lucan and Clondalkin as Metropolitan Consolidation Towns where population and housing growth should be directed, particularly to areas where there is access to high quality public transport. This is reflected in the Core Strategy contained in the Draft County Development Plan.</p> <p>The lands subject to C12 SLO1 of the Draft Plan 2016-2022, known as Beattie's Field, are subject to proposed zoning objective RES-N and are privately owned lands. The development of these lands will be impacted by a future LAP or SDZ Planning Scheme at Clonburris, with the proposed RES-N zoning providing adequate flexibility within which community infrastructure uses are permitted in principle and/or open for consideration. The use of the entire extent of these lands for community infrastructure would represent an inefficient use of zoned lands located adjacent to a high capacity public transport corridor and within a Metropolitan Consolidation Town, and would be contrary to the statutory requirements of the Planning Authority in terms of meeting housing and population targets and directing such growth into the appropriate designated areas of the County. Furthermore, the acquisition of lands and allocation of community infrastructure is beyond the strategic land use function of the County Development Plan.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
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<p>9. Request that the Plan include for provision of a sustainable Equine Facility in the area, and an off-road bike and quad facility in north Clondalkin. (DRAFTDEVPLAN0274, Lorraine Hennessy, Balgaddy Working Together Group)</p>	<p><u>Parks equipment and facilities</u> Policy C12 of the Draft Plan 2016-2022 supports the provision of a hierarchy of open space and recreational facilities throughout the County, and effective management of same. Objectives under Policy C12 make provision for the promotion of Management Plans to maximise the leisure and amenity resource offered by each of the County's parks, including existing and developing areas, for the continued improvement of the park setting, biodiversity and recreational facilities. In addition, provision is made for developing both active and passive activities, indoor and outdoor recreational facilities, including sports facilities, and play facilities for a range of ages. The identification of specific sites for such recreational facilities and amenities or allocation of premises for specific named community clubs/groups in each park, however, is beyond the scope of the strategic land use function of the County Development Plan.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Carrigmore Park</u> Section 3.13.0, Table 3.2 of Draft Plan 2016-2022 details the County's open space hierarchy, comprising Regional, Neighbourhood, Local and Small Parks in addition to Square and Plazas. While it is noted that Carrigmore Park was referred to as a 'District Park' in the Fortunestown LAP, this term referred to the size and central location of Carrigmore Park relative to the LAP lands, i.e. within the hierarchy of the LAP as opposed to the County's hierarchy. It is noted that Carrigmore Park would be categorised as a Neighbourhood Park, as per characteristics detailed in Table 3.2 of the Draft Plan, and function as such.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be</p>
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	<p>amended.</p> <p><u>Protection of existing parks</u> C12 Objective 8 of the Draft Plan 2016-2022 relates specifically to the retention of lands with established recreational uses as open space unless proximate alternatives can be agreed by the Council. There may, however, be instances where it will be appropriate to develop areas within the County so as to consolidate the built environment, which would be consistent with the Core Strategy. The wording of proposed C12 Objective 8 is considered adequate and appropriate with regard to the protection of existing sporting facilities in established built up areas.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Equine facilities</u> C12 Objective 10 of the Draft Plan 2016-2022 makes provision for the support of community recreational projects, such as horse projects, at suitable location in both existing and developing areas of the County. The identification of specific sites for such recreational facilities and amenities in each park, however, is beyond the scope of the strategic land use function of the County Development Plan.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
3.15.0 Universally Accessible Community Facilities	
<p>1. Accessibility of proposed swimming pool in Lucan (C7 Objective 7), specifically pool access and configurations. (DRAFTDEVPLAN0066, Nathalie Dowling, Lucan Autism Network)</p>	<p>Chief Executive's Response and Recommendation It is the policy of the Council to promote the highest levels of universal accessibility in all new and existing community facilities, as stated under Section 3.15.0 of the Draft Plan 2016-2022. The exact specifications or</p>

	<p>configuration of same is not, however, a matter for the Draft County Development Plan.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
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Chapter 3 Summary of Recommended Amendments to the Draft Plan

Section	Response Issue	Recommendation
3.9.0 Sports Facilities and Centres	Stadia	It is recommended that the Draft County Development Plan be amended to include the addition of 'Stadium' in the Definition of Use Classes in Schedule 5 of the Draft Plan, and the Land Use Zoning tables amended to include same where appropriate and in accordance with relevant policies and objectives of the Draft Plan.
3.11.0 Educational Facilities	Department of Education and Skills submission	It is recommended that Section 3.11.0 of the Draft County Development Plan be amended to include additional text in the narrative of Section 3.11.0.
3.12.0 Healthcare Facilities	Rosse Court Centre	Amend the County Development Plan Maps to include a Local Centre (LC) zoning at Rosse Court (see also Section 5.6.0 Retail Centres).

CHAPTER 4 - ECONOMIC DEVELOPMENT & TOURISM

4.3.0 Employment Location Categories	
<ol style="list-style-type: none"> 1. A requirement for appropriate integrated mobility management and smart travel planning should be inserted into ET1 Objective 6. (DRAFTDEVPLAN0060, Tara Spain, Transport Infrastructure Ireland (TII) DRAFTDEVPLAN0506, Tara Spain, Bonneagar Iompair Éireann) 2. Request omission of text referring to 'subject to their location within 400 metres of a high capacity public transport node (Luas/Rail)' from ET1 Objective 6. Submission refers to existing operations on specific site/lands on the Old Blessington Road, the future expansion of which could be restricted by the requirements of ET1 Objective 6. Submission notes that deletion of the reference to high capacity transport would provide flexibility in relation to the potential of the subject site. Submission also notes that, in accordance with CS6 Objective 1, it is anticipated that a new LAP will be prepared for Tallaght Town Centre and adjoining lands, with the nature and scale of future development covered by same guided by both the revised zoning strategy for Tallaght and permitted and planned development within strategic sites such as the Old Blessington Road site. (DRAFTDEVPLAN0215, John Murphy, BMA Planning, Lidl Ireland GmbH) 3. Submission notes support for ET3 Objective 6: 'To ensure that business parks and industrial areas are designed to promote walking, cycling and public transport', and requests that the wording of the objective include the provision of bike parking/storage and showering/drying facilities. (DRAFTDEVPLAN0169, Thomas Mc Dermott, South Dublin Co. Sports Partnership) 4. Consider augmenting ET1 Objective 5 (distribution of economic and tourism opportunities) with requirements in terms of site suitability and 	<p>Chief Executive's Response and Recommendation</p> <p>The Chief Executive has carefully considered the issues raised in relation to Employment Location Categories and provides responses and recommendations under the following subheadings:</p> <ul style="list-style-type: none"> ▪ Mobility management provisions ▪ ET Policy 1 Objective 6 ▪ Cycling facilities ▪ Distribution of economic and tourism opportunities ▪ Naas Road and Naas Road Development Framework Plan ▪ Quantum of lands zoned for enterprise and employment uses ▪ Third level institutions (Priory Institute) <p><u>Mobility management provisions</u></p> <p>It is noted that Section 6.4.2 of the Draft Plan 2016-2022 addresses traffic and transport management, with Actions under Policy TM5 relating specifically to the requirement of a Mobility Management Plan/Workforce Plan and/or Traffic and Transport Assessment for all major traffic generating developments. In addition, Section 11.4.6 of the Draft Plan, relating to Implementation, makes provision for Mobility Management Plans/Workforce Plans, including the thresholds for same; Table 11.25 which includes 'Offices/Financial', 'Industrial' and 'Warehousing' land uses is noted in this regard.</p> <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p> <p><u>ET Policy 1 Objective 6</u></p> <p>A number of submissions received referred to the 'Offices' floor areas</p>

access.

([DRAFTDEVPLAN0212, Doireann Ni Cheallaigh, An Taisce](#))

5. The submission outlines that there has been a significant shift in the vision that SDCC has for the Naas Road as the Naas Road Framework Plan is not referenced in the Draft Plan which appears to indicate that the overall vision that is only in place for 5 years and was deemed to be a long term vision for the future of the Naas Road Corridor, has been completely abandoned by the Planning Authority.
([DRAFTDEVPLAN0264, Joe Bonner, Joe Bonner Planning, J. Harris Assemblers](#))
6. The Eastern and Midland Regional Assembly notes the quantum of land zoned for enterprise and employment. It is advised that Chapter 4 would benefit from a more analytical approach to the complex issues of designating such lands as suggested at pre-draft submission stage. Such an approach could consider the wide typology, nature of employment and jobs ratio in the County and in relation to the other Dublin Local Authorities. It could also provide for a methodology to link the quantum of zoned lands to floorspace, density of employment and projected job numbers. This would provide an evidence based approach as required in a core strategy.
([DRAFTDEVPLAN0500, Malachy Bradley, Eastern and Midland Regional Assembly](#))
7. Submission outlines that the proposals for restricting office use would reduce the attractiveness of Citywest as an office location. The submission details the planning history of Citywest in relation to office use, the infill nature of undeveloped lands and adjacency to existing offices, the quality public transport infrastructure in the area and the existing service infrastructure in the area. The submission requested that the EE zoning be amended either:
 - To allow Office greater than 1,000 sqm as permitted in principle or

permitted under proposed EE zoning in the Draft Plan 2016-2022, specifically the caveat relating to offices greater than 1,000sqm in area, which are deemed open for consideration in accordance with Chapter 4 policies, including ET1 Objective 6 which states the following:

To direct people intensive enterprise and employment uses such as major office developments (>1,000sq.m gross floor area) into lands zoned 'Town Centre' and 'Regeneration Zones' in Tallaght, lands zoned 'Town Centre' in Clondalkin and also to lands zoned 'District Centre' and 'Enterprise and Employment' subject to their location within 400 metres of a high capacity public transport node (Luas/Rail).

Having regard to the contents of submissions received in this regard, it is considered appropriate to amend the provisions of ET1 Objective 6 to accommodate people intensive enterprise and employment uses, such as major office developments, to lands zoned 'District Centre', 'Enterprise and Employment', and 'Regeneration Zones', to within 400 metres of a high frequency bus service (in accordance with NTA Draft Transport Strategy for the GDA 2016-2035) and/or within 800 metres walking distance of a Train or Luas station, the latter being subject to demonstration of same or the proposal and implementation of a permeability project to achieve an 800 metres walking distance (in accordance with the Permeability Best Practice Guide 2013).

In summary, the recommended objective will direct people intensive enterprise and employment uses, such as major office developments, to the following area/zones:

- a) Town Centre (TC) and Regeneration (REGEN) zones in Tallaght
- b) Town Centre (TC) zone in Clondalkin
- c) Lands zoned District Centre (DC), Enterprise and Employment (EE), and Regeneration Zones (REGEN), within
 - 400 metres of a high frequency bus service and/or
 - within 800 metres walking distance of a Train or Luas station, (requiring demonstration of walking distance)

<p>- Allow greater flexibility in relation to office use in established locations as is provided under the current Development Plan rather than an arbitrary 400 metre from Luas rule. (DRAFTDEVPLAN0279, Hugh Lynn, Davy Hickey Properties, Citywest)</p> <p>8. Submission requests that the Section 3.11.2 and ET1 Objective 9 in Section 4.3.1 be amended to include the Priory Institute as an educational institution within the County. (DRAFTDEVPLAN0324, Raymond O'Malley, Kieran O'Malley & Co.Ltd, Dominican Community at St. Mary's Priory, Tallaght)</p> <p>9. Submission outlines that the office constraints in ET1 Objective 6 to within 400m of a high capacity public transport node are overly conservative and would not make the most appropriate use of the investment. Proposed that the 400m reference be replaced with 'being within the catchment' or a distance of 800m from a Luas or rail stop. (DRAFTDEVPLAN0201, Robert Keran, John Spain Associates, Hibernia REIT Plc DRAFTDEVPLAN0345, John Spain Associates, John Spain Associates, Hibernia REIT Plc)</p>	<p>Recommendation It is recommended that ET Policy 1, Objective 6 of the Draft County Development Plan be amended to accommodate people intensive enterprise and employment uses, such as major office developments, to lands zoned 'District Centre', 'Enterprise and Employment', and 'Regeneration Zones', within 400 metres of a high frequency bus service (in accordance with NTA Draft Transport Strategy for the GDA 2016-2035) and/or within 800 metres walking distance of a Train or Luas station, the latter requiring demonstration of required walking distance or provision of a permeability project (in accordance with the Permeability Best Practice Guide 2013), to achieve same.</p> <p><u>Cycling facilities</u> Section 11.4.1 of the Draft Plan 2016-2022, relating to Implementation, notes that the Council will seek to provide additional opportunities of bicycle parking facilities along public transport routes, and that all new commercial developments that have capacity to accommodate in excess of 10 no. employees and/or students shall be required to provide shower and changing facilities. Section 11.4.1 of the Draft Plan details bicycling parking standards, including minimum parking rates and design of same, with Section 6.3.4 of the Draft Plan providing specifically for the design of cycling facilities including storage facilities.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Distribution of economic and tourism opportunities</u> ET1 Objective 5 of the Draft Plan 2016-2022 makes provision for the support of balanced distribution of economic and tourism opportunities throughout the County, including the promotion of areas of high unemployment and socioeconomic disadvantage as viable locations for enterprise and employment growth. It is noted that planning applications for new or extended enterprise and employment developments,</p>
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	<p>including those that would be considered to fall within the remit of Objective 5, will be assessed on a case by case basis and on their merits with regard to issues including conformity with relevant policies, objectives and standards contained within the Plan, and compatibility of proposed land use with the zoning objective of subject site.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Naas Road and Naas Road Development Framework Plan</u> The lands along and adjacent to the Naas Road are subject to proposed zoning objectives EE, and will be considered for inclusion in the proposed LAP under CS6 SLO1 of the Draft Plan 2016-2022. The lands that are covered under CS6 SLO 1 and the proposed LAP extension lands are included the area of the Naas Road Development Framework Plan 2010. The proposed zoning objectives along and around the Naas Road allow for adequate flexibility for development in line with the provisions of the proposed LAP under CS6 SLO1. The preparation of this LAP will have regard to the Naas Road Development Framework Plan, as detailed in Section 1.9.0 of this report, and may incorporate the movement framework principles of same.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Quantum of lands zoned for enterprise and employment uses</u> The Economic Strategy for South Dublin County seeks to ensure that there is a sufficient supply of zoned and serviced lands at suitable locations to accommodate future demand for enterprise and employment investment across a diverse range of sectors. The strategy also seeks to strengthen the alignment between employment, population</p>
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	<p>and transport services. Whilst a range of employment uses are permitted in principle or open for consideration across a range of land-use zonings, the County Development Plan seeks to guide enterprise and employment development to appropriate locations by identifying economic clusters and setting out policies and objectives for the future development of these areas. Of the total hectares of land zoned for enterprise and employment related uses in the County, circa 324 hectares remain undeveloped and available for future economic growth, with circa 250 hectares of brownfield land zoned for more intensive enterprise and/or residential led development.</p> <p>The South Dublin Spatial Energy Demand Analysis (SEDA), prepared by South Dublin County Council and South Dublin Chamber of Commerce (2014), analysed the employment profile and sector breakdown of South Dublin County for 2014, and projected job numbers for each sector for the period 2015-2022 based on the South Dublin County economic profile. Having regard to lands available subject to EE and REGEN zoning objectives, the extent of realistic development potential of said lands during the 2016-2022 Draft Plan period, comparable jobs yield per hectare in the County, and resultant density of jobs per hectare, it is considered that the quantum of lands zoned for enterprise and employment uses are reasonable and appropriate to meet the employment needs for the County at this time.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Third level institutions (Priory Institute)</u> The Institute of Technology Tallaght (ITT) is nationally recognised as a centre for research and innovation. While other higher level educational institutions in the County are not specifically referenced in the Draft Plan</p>
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	<p>2016-2022, their function and position within the hierarchy of educational facilities within the County is recognised, with Section 3.11.12 of the Draft Plan providing for the support of all third and fourth level educational facilities throughout the County.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
4.5.0 Tourism and Leisure	
<p>1. Submission supporting development of land and buildings at Montpellier Hill, Deerpark House, as a visitor and leisure amenity consisting of mountain bike tracks, zip lines, conversion of derelict farm buildings to petting zoo and of unoccupied farmhouse to coffee shop. (DRAFTDEVPLAN0100, Chay Bowes, Hell Fire leisure)</p> <p>2. Failte Ireland recommend the inclusion of five new policy areas with a range of associated objectives and actions to achieve the following:</p> <ul style="list-style-type: none"> - Grow Dublin Tourism Alliance: Play a key role within Dublin Tourism Alliance; encourage and support continued collaboration with key stakeholders in the GROW Dublin Tourism Alliance and support associated objectives. - Marketing and Promotion: Overhaul the way in which South Dublin is promoted; establish a dedicated Tourism and County Promotion section, create a South Dublin tourism database; support the development of visitdublin.com website; target Culturally Curious market; commission and implement a marketing strategy for the 'Great Outdoors on Dublin's Doorstep'; support and implement associated market initiatives. - Business Tourism: Develop and promote business tourism and encourage large hotels to follow environmental best practice. - Visitor Transport Linkages: Improve visitor access to South Dublin; improve public transport links and facilities and highlight the importance 	<p>Chief Executive's Response and Recommendation The Chief Executive has carefully considered the issues raised in relation to Tourism and Leisure and provides responses and recommendations under the following subheadings:</p> <ul style="list-style-type: none"> ▪ ET Policy 8 - Heritage, Culture and Events Tourism - Objective 3 ▪ Flagship tourism project proposals ▪ Tourism in South Dublin ▪ Tourism in towns and villages ▪ Geological Heritage ▪ ET Policy 6 - Greenways, Trails and Loops ▪ Brittas and pNHA Recreation and Tourism Facility and Retirement Home Proposals ▪ ET Policy 7 - Leisure Activities ▪ Protection of biodiversity ▪ Tallaght museum ▪ Suggested additions to text and additional policies <p><u>ET Policy 8 – Heritage, Culture and Events Tourism - Objective 3</u> ET8 Objective 3 of the Draft Plan 2016-2022 relates to the support of sporting venue developments, or national or regional scale, at appropriate locations served by high frequency public transport. It is noted that Section 6.4.2 of the Draft Plan addresses traffic and transport management, with Actions under Policy TM5 relating specifically to the</p>

<p>of an interconnected city.</p> <ul style="list-style-type: none"> - Responsible tourism: Minimise negative impacts of tourism; support best practice environmental management and maximise socio-economic benefits. (DRAFTDEVPLAN0105, Eoin McDonnell, Fáilte Ireland) <p>3. Fáilte Ireland recommend the addition of objectives to policies contained in the Draft County Development Plan that will help achieve the following:</p> <ul style="list-style-type: none"> -Policy 5 Tourism Infrastructure: Facilitate access to accommodation, venues and activities; encourage provision of suitably designed accommodation; consider tourism related development in towns and villages; introduce standardised visitor signage; improve visual appearance of towns and villages. - Policy 6 Greenways, Trails and Loops: Cross reference policies contained in Chapter 9 on public rights of way and permissive access agreements. - Policy 7 Leisure Activities: Promote outdoor adventure tourism and low impact experiential tourism and development of new forest facilities. - Policy 8 Heritage, Culture and Events Tourism: Develop an online events and festivals calendar and support and promote festivals and cultural events. (DRAFTDEVPLAN0105, Eoin McDonnell, Fáilte Ireland) <p>4. Requests SDCC to consider incorporating a heritage trail (podcast, signage, accompanying webpage etc with regular hosted heritage walks) for Lucan to include some of the fantastic range of heritage in the village and environs. (DRAFTDEVPLAN0132, Helen Farrell)</p> <p>5. Amend ET8 Objective 2 or insert new policy to provide for the protection and promotion of the County's geological heritage and include GSI as</p>	<p>requirement of a Mobility Management Plan/Workforce Plan and/or Traffic and Transport Assessment for all major traffic generating developments. In addition, Section 11.4.6 of the Draft Plan, relating to Implementation, makes provision for Mobility Management Plans, including the thresholds for same; Table 11.25 which includes 'Leisure' land uses is noted in this regard.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Flagship tourism project proposals</u> It is noted that two submissions were received in relation to specific tourism proposals, including a National Flagship Tourism development, at named sites/locations. The identification and development of a specific site/premises for a tourism project, in the absence of the appropriate survey work and study, would be overly prescriptive and premature; in addition, it would be beyond the strategic land use function of the County Development Plan. ET Policy 5, Objective 3 of the Draft Plan specifically states support for the development of a visitor centre in or adjacent to the Dublin Mountain zone, subject to appropriate scale and having regard to environmental conditions, scenic amenity and service availability. It is also noted that the South Dublin Tourism Strategy 2015 makes provision for the development of the Dublin Mountains Park, including Montpellier Hill, as a Flagship Project.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Tourism in South Dublin</u></p>
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<p>an agency to work with in the associated actions. (DRAFTDEVPLAN0196, SARAH GATLEY, Geological Survey of Ireland (Dept.Communications, Energy & Natural Resources))</p> <p>6. NTA requests that ET Policy 6 be amended to acknowledge their role as funding agency for Greenway element of GDA Cycle Network. (DRAFTDEVPLAN0209, Tadhg MacNamara, National Transport Authority)</p> <p>7. Submission from Canoeing Ireland recommends that the Draft Plan provide for the development of Blueways and support canoeing initiatives, with inclusion of reference to same in objectives under ET6, inclusion of Waterways Ireland and Canoeing Ireland in the Action under ET6, and inclusion of an additional objective under ET7 specifically referencing development of canoeing infrastructure and facilities. (DRAFTDEVPLAN0176, Benny Cullen, Canoeing Ireland)</p> <p>8. Amend ET Policy 6 (Greenways) to ensure that any cycle development along the Dodder River conserves the existing landscape, habitat and heritage of the river and does not diminish existing amenity uses. (DRAFTDEVPLAN0335, Victorica White, Dodder Action)</p> <p>9. Submission seeks the inclusion of site Specific Local Objectives for lands adjacent to the Brittas Ponds to provide for</p> <ol style="list-style-type: none"> 1). an Integrated Recreation and Tourism facility including a Boutique Hotel and Angling Venue and 2). a Retirement Village. <p>It is submitted that the proposed hotel will enhance the existing character of the village and will facilitate the realisation of the tourism potential of the village, as an angling venue set around Brittas Ponds and as a gateway to the Dublin Mountains from South Dublin for walkers, hikers and cyclists, while the long term viability of the local</p>	<p>The South Dublin Tourism Strategy 2015 identifies a range of actions to develop and present the County's array of natural, cultural and built heritage resources to the tourist market. The Draft Plan 2016-2022 makes provision to support and facilitate the development of the County's tourism and leisure sector by setting out a spatial planning framework that seeks to protect and preserve key natural and built assets and supports public and private sector investment in sustainable tourism initiatives. Policies and objectives throughout the Draft Plan support the development of tourism and leisure infrastructure in the County, with Section 4.5.0 relating specifically to Tourism and Leisure.</p> <p>It is noted that the submission received from Failte Ireland references a number of issues pertaining to tourism in South Dublin, including tourism-related accommodation, ease of transport and access for visitors, marketing and promotional activities and programmes, business tourism and tourist site signage, all of which are specifically addressed in the South Dublin Tourism Strategy 2015, the implementation of which is specifically supported under ET Policy 5 of the Draft Plan.</p> <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Tourism in towns and villages</u></p> <p>The submission from Failte Ireland referenced the need to consider tourism related development in town and villages in the County. In this regard it is noted that ET5 Objective 2 of the Draft Plan 2016-2022 specifically seeks to direct tourist related facilities into established centres, in particular town and village centres, where they can contribute to the wider economic vitality of urban centres. In addition, in Section 5.1.0 of the Draft Plan relating to Urban Centres (UC) Policy 2, Objective 3 provides support for the development of future tourism related</p>
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<p>community will be secured by the creation of sustainable employment in both the hotel and the retirement village.</p> <p>Submission outlines that the amendments should be considered in the context of the recently announced Feasibility Study And Masterplan For A Flagship Tourism Facility For The Dublin Mountains and the 'Brittas Planning Study' that is to be carried out in accordance with CS6 SLO. (DRAFTDEVPLAN0250, Joe Bonner, Joe Bonner Planning, Annod Ltd DRAFTDEVPLAN0251, Joe Bonner, Joe Bonner Planning, Annod Ltd DRAFTDEVPLAN0252, Joe Bonner, Joe Bonner Planning, Annod Ltd)</p> <p>10. Submission seeks to include a National Tourism Project objective 'To support and facilitate the development of a National Flagship Tourism Development in South Dublin on the Eastern Golf Course associated with Citywest Hotel and Conference Centre', on the basis that the subject lands (predominantly subject to proposed zoning objective OS):</p> <ul style="list-style-type: none"> - have not been used as a hotel for a number of years and therefore underutilised, - are proximate to existing services, facilities, public transport infrastructure and the N7 Naas Road, - would provide an appropriate location for the development of such a flagship product (an all-weather facility, as proposed), availing of existing roads and public infrastructure in Saggart, and - would support the development of tourism infrastructure and attractions within the County at appropriate locations if subject to the proposed objective, in accordance with proposed policies and objectives pertaining to tourism development detailed in the Draft Plan. (DRAFTDEVPLAN0351, Gavin Lawlor, Tom Phillips & Associates, Cape Wrath Hotel Limited) <p>11. Submission from the DAHG advises that ET Policy 6 (greenways, trails and loops) has the potential to result in substantial loss of biodiversity and care will need to be taken to ensure that this does not happen.</p>	<p>infrastructure in town centres, with UC Policy 3, Objective 3 providing for the development of future tourism related infrastructure in the traditional villages of the County.</p> <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Geological Heritage</u></p> <p>The contents of the submission from the Geological Survey of Ireland (GSI) relating to protection and promotion of the County's geological heritage has been considered and noted. In this regard it is recommended that ET8 Objective 2 of the Draft Plan 2016-2022 be amended to include reference to geological heritage, and that the GSI be included in the list of key stakeholders in the Action relating to ET Policy 8.</p> <p>Recommendation</p> <p>It is recommended that Section 4.5.0, ET8 Objective 2 of the Draft County Development Plan be amended to include reference to the County's geological heritage, and that the GSI be included in the list of key stakeholders in the Action relating to ET Policy 8.</p> <p><u>ET Policy 6 – Greenways, Trails and Loops</u></p> <p>A number of submissions received referred to ET Policy 6 of the Draft Plan 2016-2022, referring to heritage trails and the use of software in relation to same, greenways, and blueways/water trails.</p> <p>With regard to general provision, location and new greenways, trails and loops, it is noted that the identification of specific sites for such recreational amenities is beyond the scope of the strategic land use</p>
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<p>Alternative routes may need be found as mitigation. Where such routes are proposed along waterways it should be noted that otter habitats should be taken as a 10 metre area on either side of a waterway. (DRAFTDEVPLAN0510, Simon Dolan, Department of Arts, Heritage and the Gaeltacht)</p> <p>12. Submitted that an additional paragraph be included to names of the main mountains/hills, river valleys, lakes, castles, Geo-parks, caves, headlands, canals (including towpaths), archaeological sites, wetlands, geological areas, woodlands open to the public, natural heritage, National Monuments, Wicklow National Park, AONBs & SAAOs in the County. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p> <p>13. Submitted that the part of Policy 6 Greenways, Trails and Loops, namely the 3rd line dealing with river banks and canals should be re-positioned in 8.2.0 Watercourses Network and subsumed in additional Obj 3. The remainder of Policy 6 should be re-positioned in 6.3.O Walking and Cycling and subsumed in Obj 1. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p> <p>14. Submitted that the reference to the Dublin Mountains Way should be deleted from ET6 Objective 1 as much of this Way is on public roads, without footpaths, which is highly dangerous. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p> <p>15. Submitted that following additional objective be added: Deliver a County Tourism Strategy which will include objectives of promoting rural recreational activities, access to natural geological and archaeological heritage, forestry, inland waterways and the countryside generally. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p>	<p>function of the County Development Plan. ET Policy 6 of the Draft Plan provides support for and facilitation of the development of an integrated network of Greenways and Trails along suitable corridors in the County, including river banks and canals, with connections to villages and taking account of the environmental sensitivities along such corridors. ET6 Objective 1 makes provision for greenways and trails, including the River Liffey, Dublin Mountain Way, Grand Canal, River Dodder and Slade Valley. ET6 Objective 2 provides for the development of local tourist and heritage trails at suitable locations such as Brittas, Clondalkin, Lucan, Newcastle-Lyons, Rathcoole, Rathfarnham, Saggart, and Tallaght, and seeks to make such trails interactive (e.g. development of application software). In addition, it is noted that Section 9.4.0, Policy HCL 16, Objective 2 of the Draft Plan provides for the promotion and facilitation of Permissive Access Routes and heritage trails to provide access to high amenity area, scenic and recreational lands including rural areas, forests, woodlands, waterways, upland/mountain areas, the Grand Canal, the Dodder Valley, the Liffey Valley and between historic villages (utilising modern technology), in partnership with adjoining local authorities, private landowners, semi-state and other public bodies such as Coillte and the Forest Service.</p> <p>The contents of the submission with regard to blueways and canoeing infrastructure has been considered and noted. In this regard, it is recommended that ET Policy 6 of the Draft Plan 2016-2022 be amended to include specific reference to blueways/water trails in addition to general greenways, trails and loops.</p> <p>The contents of the submission from the NTA with regard to ET Policy 6 has also been considered and noted. In this regard it is recommended that the NTA be included in the list of funding agencies in the Action relating to ET Policy 6 of the Draft Plan.</p> <p>The contents of the submission from Failte Ireland with regard to cross</p>
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<p>16. Submitted that following additional objective be added: In pursuance of its tourism strategy, seek to promote, encourage and facilitate the development of tourism through the conservation, protection and enhancement of the natural heritage including sensitive landscapes, general amenity and the countryside, so as to maximise the economic benefits and enhance the quality of life for locals and our visitors. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p> <p>17. Submitted that following additional objective be added: As environmental heritage is an important amenity upon which tourism depends and that it can be enjoyed and cherished by future generations protect, conserve and enhance them, strictly control development that might be detrimental and ensure that enforcement procedures are adhered to and that developments are appropriate in scale and balance having regard to pertaining environmental conditions and sensitivity and are sited and designed to a high standard, be clustered to form a distinct and unified feature in the landscape, utilise suitable materials and colours, and be readily absorbed in its surroundings by taking advantage of existing vegetation and/or topography, and be satisfactorily assimilated into the landscape so that they do not have an undue negative impact on the countryside or general amenities, natural and archaeological heritage features, areas of special amenity, appearance and character of landscapes, SACs, SPAs & NHAs, coastal scenery, wildlife and environmentally sensitive areas, scenic or visual amenities an along designated Scenic Routes and or degrade or alter the natural environment. Facilitate infrastructure for water-related activities providing that it is consistent with natural and recreational values of the water body and any heritage designations. The Council will use its statutory procedures to ensure that natural amenities remain visually unspoilt. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p> <p>18. Submitted that following additional objective be added: Generally</p>	<p>referencing ET Policy 6 with Section 9.4.0 of the Draft Plan regarding Public Rights of Way and Permissive Access Routes is also noted. It is recommended that ET Policy 6 be amended accordingly.</p> <p>Recommendation</p> <p>It is recommended that Section 4.5.0, ET Policy 6 of the Draft County Development Plan be amended to include reference to blueways/water trails, to include the NTA in the list of funding agencies in the Action relating to ET Policy 6, and to include cross reference to Section 9.4.0 of the Draft Plan with regard to Rights of Way and Permissive Access Routes.</p> <p><u>Brittas and pNHA Recreation and Tourism Facility and Retirement Home Proposals</u></p> <p>Submissions have been received that seek the inclusion of SLOs for an integrated recreation and tourism facility, and a retirement and nursing home development on lands zoned Objective HA-DM (High Amenity - Dublin Mountains) to the north of Brittas within or adjacent to the Brittas Ponds/Slade of Saggart and Crooksling Glen proposed Natural Heritage Area (pNHA). This area is subject to Draft Plan 2016-2022 objectives (Policy H23 and HCL13 Objectives), which seek to limit development to that which is directly related to the pNHA amenity potential, ensure that it is designed and sited appropriately and accords with rural housing needs policy in terms of local housing needs.</p> <p>CS6 SLO 3 of the Draft Plan also seeks the preparation of a planning study for Brittas Village, in consultation with local residents and local representatives, having regard to the implications of the proposed Natural Heritage Area designations, the future protection and enhancement of the village, and the development of tourism potential in the area with a view to the long term viability of the local community.</p> <p>The inclusion of SLO's providing for an integrated recreation and</p>
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<p>require tourism and recreational related developments to locate within existing towns and villages, except where the nature of the activity renders this impossible. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p> <p>19. Submission requests scoping for provision of a museum in Tallaght. (DRAFTDEVPLAN0261, Gerard Stockil, Tallaght Community Council)</p> <p>20. Request for SLOs to provide for looped walkways along specified routes, provision of increased riverbank access for recreational purposes, and greenway link for walking and cycling along Whitestown stream. (DRAFTDEVPLAN0261, Gerard Stockil, Tallaght Community Council)</p>	<p>tourism facility and associated retirement village and nursing home developments in the absence of essential scoping of the study, preliminary survey and research work, and consultation with relevant stakeholders would be overly prescriptive and premature. In this regard, it would undermine the impending planning study to an extent that it would significantly reduce its value in terms of the protection of the visual and environmental sensitivities of the area and compliance with the objectives of the County Development Plan in relation to zoning, its Core Strategy and the protection of natural heritage.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>ET Policy 7 – Leisure Activities</u> The submission received from Failte Ireland references outdoor tourism and the development of new forest facilities. In this regard, it is noted that Policy HCL16 Objective 2 of the Draft Plan 2016-2022 provides for the promotion and facilitation of Permissive Access Routes and heritage trails providing access high amenity, scenic and recreational lands including rural areas, forests and woodlands. It is also noted that Section 4.5.0 of the Draft Plan provides for Policies, Objectives and Actions in relation to the development of an integrated network of greenways and trails, including combined off road cycle and walking routes, along suitable corridors (ET Policy 6), and the development of leisure activities in the County (ET Policy 7). ET7 Objective 1 of the Draft Plan provides specifically for the active use of managed forests for tourism and leisure related activities, subject to an appropriate scale of development having regard to the pertaining environmental conditions and sensitivities, scenic amenity and availability of services.</p> <p>The contents of the submission with regard to blueways and canoeing infrastructure also has been considered and noted. In this regard, it is</p>
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	<p>recommended that that ET Policy 7 of the Draft Plan be amended to include specific reference to canoeing/kayaking infrastructure. It is also noted that Waterways Ireland, also referred to in this submission, are specifically noted in list of stakeholders the Action under ET Policy 8, which provides for cooperation between the Planning Authority and key stakeholders in the identification and promotion of tourism assets, and the support for the development of tourism infrastructure in the County.</p> <p>Recommendation</p> <p>It is recommended that Section 4.5.0, ET Policy 7 of the Draft County Development Plan be amended to include reference to canoeing/kayaking infrastructure and facilities.</p> <p><u>Protection of biodiversity</u></p> <p>Two submissions received in relation to Policy ET6 of the Draft Plan 2016-2022 regarding protection of existing biodiversity in the County, with one submission making specific reference to otter habitats and the need for 10 metre protection zones where greenways, trails and loops are proposed.</p> <p>It is noted that HCL Policy 1 states that is it the policy to protect conserve and enhance natural, built and cultural heritage features, and to support the objectives and actions of the County Heritage Plan, with HCL1 Objective 2 providing specifically for the preparation of a County Biodiversity Plan. In addition, G1 Objective 2 provides specifically for the preparation and implementation of a South Dublin County Green Infrastructure Strategy during the lifetime of the Draft Plan, which will form the basis for the identification, protection, enhancement and management of the Green Infrastructure Network within the County.</p> <p>As noted above, ET Policy 6 provides support for and facilitation of the development of an integrated network of Greenways and Trails along</p>
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	<p>suitable corridors in the County, including river banks and canals, with locations connections to villages and taking account of the environmental sensitivities along such corridors. It is also noted that Policy 3G Objective 2 makes specific provision for a 10 metre biodiversity protection zone from the top of the bank of all watercourses in the County, the full extent of which is to be determined on a case by case basis by the Planning Authority, based on site specific characteristics and sensitivities. In addition, Policy G3 Objective 2 notes that Strategic Green Routes and Trails identified in the South Dublin Tourism Strategy 2015, the Greater Dublin Area Strategic Cycle Network, and other government plans or programmes forming part of the County's Green Infrastructure network will be open for consideration within the biodiversity protection zone, subject to appropriate safeguards and assessments.</p> <p>The responses under Chapter 8, Green Infrastructure, with regard to the County Biodiversity Plan are also noted in this regard.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Tallaght museum</u> The identification and development of a specific site/premises for a tourism project, in the absence of the appropriate survey work and study, would be overly prescriptive and premature; it addition, it would be beyond the strategic land use function of the County Development Plan. It is noted that ET8 Objective 2 of the of the Draft Plan 2016-2022 makes specific provision for supporting tourism projects that seek to showcase and promote the County's cultural heritage, including the development of museums, cultural centres and interpretive centres at appropriate locations.</p>
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	<p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Suggested additions to text and additional policies</u> A submission received made a number of suggested changes to the narrative text contained within Chapter 4 of the Draft Plan 2016-2022. Items included delivery of a tourism strategy and objectives in relation to same, location of recreational and tourism related developments, environmental heritage with regard to tourism, omission of specific sites/location from text, inclusion of extensive listing of natural and built heritage features across the County, and relocation of text within Chapter 4 and between Draft Plan chapters. The contents of the submission has been considered and noted; the wording of the Policies, Objectives, and Actions, including those detailed above, and location of same within Chapter 4 and the overall Draft Plan are considered adequate and appropriate with regard to the protection of existing resources and amenities with the development of tourism and leisure across the County.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>4.6.0 Rural Economy</p>	
<p>1. Fáilte Ireland recommend that objectives be added to Policy 9 Rural Economy that will promote and facilitate the development of rural tourism such as open farms, craft villages and visitor centre and encourage the reuse of vernacular buildings for tourist related facilities. (DRAFTDEVPLAN0105, Eoin McDonnell, Fáilte Ireland)</p>	<p>Chief Executive's Response and Recommendation <u>Rural tourism, agriculture and farm diversification</u> Section 4.5.0 of the Draft Plan 2016-2022 provides for Policies, Objectives and Actions in relation to tourism infrastructure (ET Policy 5), and the development of heritage, cultural and events tourism (ET Policy 8) in both rural and urban areas of the County. ET Policy 9 of the Draft</p>

<p>2. Request that ET 9 Objective 1 be subsumed in a new sub section called Rural Tourism and the Economy, with additional text and objectives pertaining to issues including the growth of rural tourism (including agri-tourism), and support of farm diversification subject to appropriate safeguards. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p> <p>3. Submitted that an additional sub section named Agriculture be included, with additional text and objectives pertaining to recreational use of agricultural lands and the protection of rural amenity from agricultural development. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p> <p>4. Submitted that an additional sub section named Forestry be included, with additional text and objectives pertaining to the recreational and tourism potential of forestry, access to forestry and woodland for walking and cycling trails, location and management of forestry projects, public rights of way, and woodland initiatives, all in accordance with national policy and liaising with strategic partners in relation to same. Submission also refers to compliance with and promotion of the County Indicative Forest Strategy. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p>	<p>Plan states that the Council will support sustainable rural enterprises whilst protecting the rural character of the countryside and minimising environmental impacts. Objectives under ET Policy 9 provide for the facilitation of sustainable agriculture, forestry and other rural enterprises at suitable locations in the County, and support for farm diversification and agri-tourism subject to scale and appropriate safeguards. It is also noted that Section 11.3.7 of the Draft Plan, relating to Implementation, provides specific requirements for the assessment of farm diversification development proposals, with the development of new Rural Enterprises encouraged on lands designated with Zoning Objective RU, subject to compliance with stated criteria.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p>Forestry As noted above, objectives under ET Policy 9 of the Draft Plan 2016-2022 provide for the facilitation of sustainable agriculture, forestry and other rural enterprises at suitable locations in the County. ET Objective 4 relates specifically to support for sustainable forestry development at suitable locations in the County, subject to the protection of the rural environment, sensitive areas and landscapes. In addition, Policy HCL16 Objective 2 of the Draft Plan provides for the promotion and facilitation of Permissive Access Routes and heritage trails providing access high amenity, scenic and recreational lands including rural areas, forests and woodlands.</p> <p>It is also noted that Section 4.5.0 of the Draft Plan provides for Policies, Objectives and Actions in relation to the development of an integrated network of greenways and trails, including combined off road cycle and walking routes, along suitable corridors (ET Policy 6), and the</p>
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	<p>development of leisure activities in the County (ET Policy 7). ET7 Objective 1 of the Draft Plan provides specifically for the active use of managed forests for tourism and leisure related activities, subject to an appropriate scale of development having regard to the pertaining environmental conditions and sensitivities, scenic amenity and availability of services.</p> <p>It is noted that the submission noted the Indicative Forest Strategy for South Dublin; this strategy is referenced in the South Dublin Heritage Plan 2010-2015 and is not a matter for the Development Plan.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
4.7.0 Mineral Extraction	
<ol style="list-style-type: none"> 1. Submission on behalf of Roadstone Limited requests that ET10 Objective 2 be amended to only apply a restriction to quarry development in environmentally sensitive locations (HA - DV/LV/DM) to that which would have significant adverse effects. (DRAFTDEVPLAN0151, Aoife Byrne, SLR Consulting, Roadstone Limited) 2. Amend ET10 Objective 3 to seek the production of re-use plans for quarries reaching the end of their productive life. Such plans to provide for retention and promotion of features of geological, biodiversity and industrial heritage value. (DRAFTDEVPLAN0196, SARAH GATLEY, Geological Survey of Ireland (Dept.Communications, Energy & Natural Resources)) 3. Include more specific objectives that avoid quarrying activity in built and natural heritage designated areas, defer mineral extraction from upland areas and take the proximity of local residents into consideration when 	<p>Chief Executive's Response and Recommendation ET Policy 10 of the Draft Plan 2016-2022 provides for sustainable extractive development at suitable locations within the County, subject to appropriate safeguards, and protection of amenity and environmental quality. ET10 Objective 2 seeks to limit the operation of extractive industry and ancillary uses at environmentally sensitive locations where extraction would prejudice the protection of the County's natural and built heritage. ET10 Objective 3 relates specifically to the satisfactory reinstatement of disused quarries and extraction facilities where active use has ceased.</p> <p>Section 11.3.8 of the Draft Plan, relating to Implementation, provides specifically for extractive industries, detailing the assessment criteria for the development, intensification or diversification of same. Section 11.3.8 notes that extractive industry will be assessed having regard to the Quarries and Ancillary Activities Guidelines DEHLG, 2004, the nature of the proposal, method of extraction, the scale of activity</p>

assessing quarry development.

([DRAFTDEVPLAN0212, Doireann Ni Cheallaigh, An Taisce](#))

4. Submitted that additional text be added to Section 4.7.0 pertaining to protection of the visual amenity of upland areas from extractive industries, location of extractive industries, and inclusion of reference to relevant guidelines in relation to extractive industries.
([DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open](#))
5. Submit that ET10 Objective 1 be replaced by:
Development of aggregates(stone and sand/gravel deposits) will not be permitted in SACs, SPAs, NHAs, Nature Reserves, high amenity areas(including buffer zones), in the vicinity of recorded monuments, World Heritage Sites and zones of archaeological potential. In other areas development will be permitted only when it is carefully sited and designed and when the environment and the character of the landscape, particularly sensitive landscapes, AONBs, natural heritage and archaeological heritage and potential, eskers, areas of geological or geomorphological interest, areas of ecological importance, national monuments, listed views and prospects, lakes, river corridors and associated wetlands and places of natural beauty or interest are safeguarded, preserved, conserved and protected to the greatest possible extent and that development does not adversely affect amenities for local people and visitors. Applicants for new or extensions to existing quarries shall submit a detailed landscape and visual assessment which shall identify the area of visual influence and include details of impacts on designated amenity areas and indicate the use of hills and existing trees or other screening to be retained or removed and any proposed screening, grassing or planting of trees or scrubs and proposals for their maintenance, must be carried out and used to determine the extent of the area of visual influence and this screening whether by natural or by alternative means must be retained for the life of the planning permission and of methods to reduce environmental

proposed, the impact on the adjoining road network and its effect on the environment, in addition to consideration of any visual impacts, noise, vibrations, dust prevention, protection of rivers, lakes, Natura 2000 sites, water sources, impact on residential and other amenities, impact on the road network, issues of road safety, phasing, reinstatement and landscaping of worked sites. Section 11.3.8 notes that development proposals pertaining to the extractive industry will be screened for likely significant environmental impacts and Environmental Impact Statements (EIS) may be required for sub threshold developments (5 hectares or below); in addition, a detailed landscaping plan, which should indicate proposed screening for the operational life of the site and set out a programme for the reinstatement of the landscape when the extraction process has ceased, will also be required. Section 11.3.8 also notes that the Council will aim to minimise the environmental and other impacts of mineral extraction through licensing, development management and to investigate representations in writing and expeditiously implement the enforcement provisions of the Planning and Development Acts.

The contents of submissions relating to extractive industries have been considered and noted. Having regard to the response above, minor changes only are proposed to existing text, specifically to the text of ET10 Objective 2 to include reference to resultant significant adverse effects of extraction, to the text of ET10 Objective 3 to include reference to the re-use of quarries in addition to reinstatement, to the text of Section 11.3.8 to reflect same, and to Section 11.3.8 regarding relevant national guidance.

Recommendation

It is recommended that

- Section 4.5.0, ET10 Objective 2 of the Draft County Development Plan be amended to include reference to resultant significant adverse effects of extraction,
- ET10 Objective 2 of the Draft Plan be amended to include

<p>impact including the potential impacts to visual amenity and other relevant considerations together with proposals for their mitigation. The Planning Authority will place the onus on the developer to prove that the proposed development can be accommodated in the landscape without detracting from its character and will impose strict conditions on planning permissions relating to the avoidance or mitigation of visual and other environmental impacts operations should not have a detrimental environmental effect on designated or proposed conservation sites and do not adversely affect European Conservation Sites. Minimise environmental impacts through rigorous application of licencing development management and enforcement requirements. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p> <p>6. Submitted that additional text be added to ET 10 Objective 3 pertaining to phasing of extractive industry developments, and restoration of quarries including specifications for same. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p> <p>7. Submitted that additional objectives be added to ET 10 pertaining to engagement with lobby groups, local amenity groups and other councils regarding the Council's management and control of extractive industries; consultation with statutory bodies; specifications regarding the assessment of extractive industry proposals/developments; compliance with Council and national guidelines; reference to manufacturing of aggregate products; the application of licensing, development management and enforcement; the contents of planning applications for extractive industry proposals; and Appropriate Assessment. DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p>	<p>reference to the re-use of quarries,</p> <ul style="list-style-type: none"> ▪ Section 11.3.8 of the Draft Plan be amended to reflect same, and ▪ Section 11.3.8 of the Draft Plan be amended to include reference to relevant national guidance on quarries and ancillary activities.
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Chapter 4 Summary of Recommended Amendments to the Draft Plan

Section	Response Issue	Recommendation
4.3.0 Employment Location Categories	ET Policy 1 Objective 6	It is recommended that ET Policy 1, Objective 6 of the Draft County Development Plan be amended to accommodate people intensive enterprise and employment uses, such as major office developments, to lands zoned 'District Centre', 'Enterprise and Employment', and 'Regeneration Zones', within 400 metres of a high frequency bus service (in accordance with NTA Draft Transport Strategy for the GDA 2016-2035) and/or within 800 metres walking distance of a Train or Luas station, the latter requiring demonstration of required walking distance or provision of a permeability project (in accordance with the Permeability Best Practice Guide 2013), to achieve same.
4.3.0 Tourism and Leisure	Geological Heritage	It is recommended that Section 4.5.0, ET8 Objective 2 of the Draft County Development Plan be amended to include reference to the County's geological heritage, and that the GSI be included in the list of key stakeholders in the Action relating to ET Policy 8.
4.3.0 Tourism and Leisure	ET Policy 6 – Greenways, Trails and Loops	It is recommended that Section 4.5.0, ET Policy 6 of the Draft County Development Plan be amended to include reference to blueways/water trails, to include the NTA in the list of funding agencies in the Action relating to ET Policy 6, and to include cross reference to Section 9.4.0 of the Draft Plan with regard to Rights of Way and Permissive Access Routes.
4.3.0 Tourism and Leisure	ET Policy 7 – Leisure Activities	It is recommended that Section 4.5.0, ET Policy 7 of the Draft County Development Plan be amended to include reference to canoeing/kayaking infrastructure and facilities.
4.7.0 Mineral Extraction	Mineral Extraction	It is recommended that <ul style="list-style-type: none"> ▪ Section 4.5.0, ET10 Objective 2 of the Draft County Development Plan be amended to include reference to resultant significant adverse effects of extraction, ▪ ET10 Objective 2 of the Draft Plan be amended to include reference to the re-use of quarries, ▪ Section 11.3.8 of the Draft Plan be amended to reflect same, and ▪ Section 11.3.8 of the Draft Plan be amended to include reference to relevant national guidance on quarries and ancillary activities.

CHAPTER 5 - URBAN CENTRES & RETAILING

5.1.0 Urban Centres	
<ol style="list-style-type: none"> 1. Requests the strengthening of general amenities in the Balgaddy area such as accessible local shops, to include a post office, general improvements in car parking and recreational facilities and that they should be a key priority for action. (DRAFTDEVPLAN0043, Lorraine Hennessey, Balgaddy Working Together Group) 2. Requests the prioritisation of the full development of the local neighbourhood centre in Balgaddy (Rosse Court) to meet the needs of the community. (DRAFTDEVPLAN0043, Lorraine Hennessey, Balgaddy Working Together Group) 3. Requests the establishment of a centre for the Firhouse/Ballycullen area, where people can congregate, such as an identified village centre or an area to ensure that vulnerable people in society do not feel isolated such as older people and young mothers. (DRAFTDEVPLAN0046, Louise Purcell) 4. No buildings over three stories should be permitted within a certain radius of historic centres or villages at any location in the County, not solely in Palmerstown Village [see: Policy UC6 SLO1]. (DRAFTDEVPLAN0260, Maura gaffney) 5. The major development at the old Vincent Byrne site should be in keeping with the height of existing buildings in the area and be sympathetic to same (DRAFTDEVPLAN0145, Joe Harrington) 6. Submission requests creation of a formal gateway into the County Town, including public art on approach roads. In relation to Section 5.1.2, submission notes that environmental 	<p>Chief Executive's Response and Recommendations</p> <p>The Chief Executive has carefully considered the issues raised in relation to Urban Centres and provides responses and recommendations under the following subheadings:</p> <ul style="list-style-type: none"> ▪ Ballycullen/Firhouse and Balgaddy ▪ Building Height ▪ SLO for ESSO site in Tallaght ▪ Village Centres <p><u>Ballycullen/ Firhouse and Balgaddy</u></p> <p>The Chief Executive acknowledges the issues raised in relation to Urban Centres, including the request to establish a centre for the Firhouse/ Ballycullen area, the provision of a local neighbourhood centre and amenities at Balgaddy. Section 5.1.0 of the Draft Plan 2016-2022 outlines a hierarchy of urban centres in the County, from Tallaght as the County Town at the top to the network of local centres and local shops to serve a local catchment. This is outlined in Urban Centres (UC) Policy 1 and the top tiers are illustrated in Figure 5.2. UC Policy 1 states:</p> <p>'It is the policy of the Council to continue to develop the County's network of town centres, village centres, district centres and local centres, based on the following hierarchy:</p> <ul style="list-style-type: none"> ▪ Tallaght as the County Town; ▪ Clondalkin as a vibrant Town Centre; ▪ Traditional Village Centres as vibrant and sustainable centres; ▪ A network of District Centres to serve a district catchment and ▪ A network of Local Centres and local shops to serve a local catchment.' <p>Firhouse is included as a District centre in the Urban Hierarchy to serve the surrounding catchment. In addition, the Draft Plan Map delineates a network of Local Centres through the 'LC' zoning in the County. It is considered that the provision of a district centre and a range of local centres in the Firhouse/</p>

<p>and public realm improvements to traditional villages should be sensitive and traditional in design.</p> <p>Submission also recommends inclusion of an additional objective to provide consistent, robust common design statements for all 9 traditional villages in the County.</p> <p>In relation to Section 5.1.4, submission recommends inclusion of an additional SLO, similar to UC5 SLO1, on Tallaght Esso site.</p> <p>In relation to Section 5.1.5, submission recommends inclusion of an additional SLO, similar to UC6 SLO1, to cover the Tallaght area.</p> <p>(DRAFTDEVPLAN0261, Gerard Stockil, Tallaght Community Council)</p>	<p>Ballycullen area addresses the concerns of the submission.</p> <p>The submission in relation to the provision of local shops, such as a post office and a neighbourhood centre at Balgaddy is acknowledged. With regard to the provision of a post office or a specific shop, the County Development Plan process does not have a function with regard to the selection of occupiers into any retail centres. Having regard to the submissions received, the Chief Executive considers that a local centre zoning should be applied at Rosse Court to reflect the cluster of existing retail/ commercial premises and provide a policy framework and suitable location for the provision of additional services in the area.</p> <p>Recommendation</p> <p>It is recommended that the Draft County Development Plan be amended to include a Local Centre (LC) zoning at Rosse Court.</p> <p><u>Building Height</u></p> <p>The Chief Executive notes the content of the submissions in relation to restricting building heights in village centres and at Palmerstown. The issue of the building height at the Vincent Byrne site at Palmerstown is addressed in the Draft Plan 2016-2022 by Urban Centre (UC) Policy 6 SLO 1 which states:</p> <p>‘To preserve the character of Palmerstown Village by limiting any future development on the former Vincent Byrne site to three storeys in height; and two storeys where it backs or sides onto adjoining two storey housing.’</p> <p>In relation to the submissions requesting that ‘no buildings over three stories should be permitted with a certain radius of historic centres or villages at any location in the County..’ and a similar proposal for an SLO for the Tallaght area in relation to building height, the Chief Executive considers that the introduction of such blanket restrictions in Village Centre zones would be overly restrictive and inflexible. The Draft Plan provides a detailed policy context for the Village Centres in Section 5.1.2 of the Plan. Furthermore, Section 5.1.5 Building Heights in Urban Centres and Section 11.2.7 Building Height are relevant to the this issue. In particular, the</p>
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	<p>following objectives are noteworthy:</p> <p><i>UC3 Objective 1: To protect and conserve the special character of the historic core of the traditional villages and ensure that a full understanding of the archaeological, architectural, urban design and landscape heritage of the villages informs the design approach to new development and renewal, in particular in Architectural Conservation Areas (ACAs).</i></p> <p><i>UC3 Objective 2: To promote design standards and densities in traditional village centres, that are informed by the surrounding village and historic context and enhance the specific characteristics of each town or village in terms of design, scale and external finishes.</i></p> <p><i>UC6 Objective 1: To encourage varied building heights in town, district, village, local and regeneration areas to support compact urban form, sense of place, urban legibility and visual diversity while maintaining a general restriction on the development of tall buildings adjacent to two-story housing.</i></p> <p><i>UC6 Objective 2: To ensure that higher buildings in established areas take account of and respect the surrounding context.</i></p> <p>Any development on sites within the Village Centre are required to be assessed on merit in the context of the proposed safeguards, policies and objectives contained within the Draft Plan and it is considered that these provisions provide a suitable framework for assessment and address the concerns of the submissions.</p> <p>Additionally, there is a concern that the imposition of a three storey height limit would contradict Section 28 Ministerial Guidelines for the redevelopment of brownfield sites on public transport corridors. The Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009 (DECLG) encourage higher densities with a minimum of 50 dwelling per hectare in such circumstances. Meeting this requirement</p>
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	<p>would be extremely problematic in the event of a 3 storey height restriction.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>SLO for ESSO Site in Tallaght</u> The Chief Executive notes that the issue of an SLO similar to the Urban Centre (UC) Policy 5 SLO 1 in the Draft Plan be applied to the former ESSO site in Tallaght is raised.</p> <p>In the Draft Plan 2016-2022, the policy context of the site has been amended from the current Plan 2010-2016 and the site is now zoned as 'Village Centre' with an objective to 'To protect, improve and provide for the future development of Village Centres'. Furthermore, the site has a policy context established by Section 5.1.2, the Land Use Zoning Matrix and the relevant safeguards in Chapter 11. In particular, the following is noted:</p> <p><i>UC1 Objective 1: To direct retail, commercial, leisure, entertainment, civic, community and cultural uses into town, village, district and local centres and to achieve a critical mass of development and a mix of uses that is appropriate to each level in the urban hierarchy.</i></p> <p><i>UC1 Objective 2: To recognise the pre-eminence of our County's town centres and traditional villages as the preferred location in considering development proposals for non-retail civic, public service and community developments; and to apply a sequential approach as appropriate for such proposals.</i></p> <p><i>UC3 Objective 1: To protect and conserve the special character of the historic core of the traditional villages and ensure that a full understanding of the archaeological, architectural, urban design and landscape heritage of the villages informs the design approach to new development and renewal, in particular in Architectural Conservation Areas (ACAs).</i></p>
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	<p><i>UC3 Objective 2: To promote design standards and densities in traditional village centres, that are informed by the surrounding village and historic context and enhance the specific characteristics of each town or village in terms of design, scale and external finishes.</i></p> <p>The site location and characteristics of the ESSO site are replicated across the County in Village Centres. The policies and objectives of the Draft Plan, as detailed above, address the concerns of the submission in relation to the provision of appropriate development and a mix of uses on the site and site specific replication of the objectives is not required.</p> <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Village Centres</u></p> <p>The Chief Executive has considered the content of the submissions in relation to Village Centres and Tallaght, in particular the issue that environmental and public realm improvements to traditional villages should be sensitive and traditional in design and the request that robust common design statements for all 9 traditional villages in the County be prepared. These issues are addressed in the Draft Plan 2016-2022 under Section 5.1.2 Traditional Villages, including the following:</p> <p><i>Urban Centre Policy 3 Village Centres: It is the policy of the Council to strengthen the traditional villages of the County by improving the public realm, sustainable transport linkages, commercial viability and promoting tourism and heritage value.</i></p> <p><i>Village Centre – Actions:</i></p> <p><i>To protect and enhance the amenities and character of village centres, the Council will encourage the improvement and development of the commercial, service, social and cultural functions which town and village centres perform, while ensuring the protection of the archaeological and architectural heritage and environmental quality.</i></p>
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	<p><i>Support the public realm improvement schemes under the Village Initiative.</i></p> <p><i>To encourage and support proposals from local communities to draw up Village Design Statements for their local village in accordance with the Heritage Councils Community-Led Village Design Statements in Ireland Toolkit (2012).</i></p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
5.2.0 Retailing, 5.3.0 Additional Retail Floor Space & 5.6.0 Retail Centres	
<p>1. All new developments should provide convenience shopping within 10 minutes walking distance of residential schemes. (DRAFTDEVPLAN0212, Doireann Ni Cheallaigh, An Taisce DRAFTDEVPLAN0496, Patrick Leonard, An Taisce)</p> <p>2. Submission relates to the Texaco Service & Petrol Filling Station on the N81. The stated purpose of the submission is to obtain a site specific objective to facilitate enhancement of the retail offering. The submission concludes that the subject site has experienced marginal intensification over the lifespan of the petrol filling station in response to the market needs. The significant increase in population and projected figures from the CSO demonstrate this population will continue to grow into the future. There is a commercial pressure on the facility to continue growth to respond to the needs of the local community as well as passing trade. The growth in commercial activity on the subject site has been a positive influence on job creation and it is anticipated that additional employment will be created by further expansion of the onsite retail facility. (DRAFTDEVPLAN0147, Joseph Corr, Corr & Associates)</p>	<p>Chief Executive's Response and Recommendations The Chief Executive has carefully considered the issues raised in relation to Retailing and Retail Centres and provides responses and recommendations under the following subheadings:</p> <ul style="list-style-type: none"> ▪ Liffey Valley, including Urban Centre ▪ Clondalkin, ▪ Firhouse, Palmerstown & Knocklyon – Level 3 Centres, ▪ Texaco Site on the N81 at Spawell, ▪ Retail Terminology, ▪ Design of Retail, ▪ Additional Retail, ▪ Convenience Shops in Residential Areas, ▪ Strategic Development Zones (SDZ), ▪ Level 4 Description, ▪ Retail Floor Area Terminology, ▪ Balgaddy, ▪ Sequential Approach, ▪ Trader and Craft Business in Villages, ▪ Design Quality. <p><u>Liffey Valley</u></p>

<p>3. Submission questions the absence of Liffey Valley as a Town Centre on the basis of the prepared Liffey Valley LAP and objectives in relation to Civic, Community, Cultural and Training facilities for the surrounding residential areas. (DRAFTDEVPLAN0225, Joanna Tuffy, TD - Constituency of Dublin Mid-West)</p> <p>4. Ensure the Development Plan applies a consistent approach for retail terminology throughout the Plan, in particular in relation to comparison shopping. (DRAFTDEVPLAN0188, Robert McLoughlin, Bilfinger GVA, Hines Real Estate Ireland Ltd)</p> <p>5. It is essential that the policies and objectives included in the Draft Plan which promote the consolidation of existing retail facilities and opportunities for new modern retail facilities are not undermined by the statement contained in section 5.3.0 in relation to the adequacy of permitted retail. (DRAFTDEVPLAN0188, Robert McLoughlin, Bilfinger GVA, Hines Real Estate Ireland Ltd)</p> <p>6. To remove the reference to 'small scale' in 'Retail (R) Policy 1 Overarching' - 'R1 Objective 9'. Considered that the emphasis on 'small scale' may unduly restrict neighbourhood type retailing. Submitted that the phrase 'small scale' should be removed (resulting in a reference to 'local convenience shops'), and the Planning Authority should rely on zoning objectives and other retailing objectives (e.g. sequential approach) regarding controlling the location and size of retail development. (DRAFTDEVPLAN0190, Fintan Morrin, The Planning Partnership, Lidl Ireland GmbH)</p> <p>7. To add reference to 'local centre' in the hierarchy referred to in 'RETAIL (R) Policy 2 Sequential Approach' - 'R2 Objective 1' (DRAFTDEVPLAN0190, Fintan Morrin, The Planning Partnership, Lidl Ireland GmbH)</p>	<p>The issues raised in relation to the role of Liffey Valley in the County are noted and segregated into retail status and urban centre issues.</p> <p>Retail Status: In respect of the retail hierarchy, Liffey Valley Shopping Centre is designated as a Level 2 centre under the Retail Strategy for the Greater Dublin Area 2008-2016. The Draft Plan 2016-2022 reflects this status of the centre in Section 5.6.2 and provides a 'Major Retail Centre (MRC)' land use zoning for the site 'To protect, improve and provide for the future development of a Major Retail Centre.'</p> <p>It is requested by submission that the Development Plan recognise that the expansion of retail offer and development of infill lands at Liffey Valley have long since been identified as a necessary requirement for the Centre to compete on a like for like basis with other Level 2 centres. The Draft Plan outlines that it is the policy of the Council to support the Level 2 retail function of Liffey Valley Shopping Centre and includes objectives in relation to the growth of the centre and consolidation of the quantum and quality of the retail offering. As such, the Chief Executive considers that the policy context in the Draft Plan for Liffey Valley reflects the Level 2 retail status.</p> <p>Urban Centre The Chief Executive notes the submissions received in relation to the omission of Liffey Valley from the Urban Hierarchy. It is noted that the Department of Environment, Community and Local Community have requested a clearer rationale for the omission of Liffey Valley from the Urban Hierarchy.</p> <p>Liffey Valley functions successfully as a regional shopping centre predominantly served by the adjoining national road network. The wider mixed – use residential, social, civic and commercial elements that would normally characterise a significant urban centre have not emerged at Liffey Valley. The non – retailing uses that have been developed are predominantly related to its location at a major road junction and are independent of the immediate catchment. The potential for a mixed use town centre at Liffey Valley is limited by virtue of its two road vehicular</p>
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<p>8. Ensure that Development Management policies acknowledge that modern retail stores are designed to be efficient, spacious and provide a pleasant environment for both employees and consumers. (DRAFTDEVPLAN0206, Muirenn Duffy, Bilfinger GVA, Tesco Ireland Ltd.)</p> <p>9. Amend the definition of the retail use cases contained in Schedule 5 to include Hypermarket in accordance with the provisions of the policies and objectives of the Draft CDP. (DRAFTDEVPLAN0206, Muirenn Duffy, Bilfinger GVA, Tesco Ireland Ltd.)</p> <p>10. The application of the retail hierarchy should recognise the role and scale of existing centres, while providing flexibility to allow for the redevelopment where necessary. Requested that the Local Authority acknowledge that the attraction of investment from retailers will be dependent on taking a flexible approach in terms of unit sizes, signage, parking and end user types. A clear approach is required to retail definitions throughout the Plan to ensure all types of retailing are addressed and to ensure consistency between the policies and objectives, the Zoning Objective Matrix and the Land Use Zoning Tables. (DRAFTDEVPLAN0206, Muirenn Duffy, Bilfinger GVA, Tesco Ireland Ltd.)</p> <p>11. The submission of the Eastern and Midland Regional Assembly advises that the Retail Strategy for the Greater Dublin Area (2008) is the relevant retail policy document in relation to the retail hierarchy in the county. It is recommended that the role of Clondalkin would benefit from some clarity. It is recognised that Clondalkin has a broad range of high level retailing amongst other services and that this is expressed in its town centre zoning objective, however, the retail hierarchy policy should reflect the Regional Planning Guidelines and state that the retail element of Clondalkin is at District Level 3 scale. A similar statement to that</p>	<p>dominated accesses, the fragmented local catchment and the severance of the centre from the local catchment. The Chief Executive considers that the current and future role of Liffey Valley is as a regional shopping centre and that the wider urban centre uses should be promoted at more appropriate and accessible adjacent centres such as Clondalkin, Clonburris, Lucan and Palmerstown. The Draft Plan reflects this rationale through the provision of the MRC zoning for Liffey Valley and the removal of the shopping centre from the Urban Hierarchy of the County.</p> <p>The Draft Plan includes an objective to prepare a Local Area Plan for the Major Retail Centre to reflect the Development Plan policy context and update the existing Liffey Valley Local Area Plan 2008.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Clondalkin</u> The Chief Executive acknowledges the Eastern and Midlands Regional Authority and the Department of Environment, Community and Local Community recommendation that the role of Clondalkin in terms of retail and urban hierarchy status would benefit from clarification in the Draft Plan 2016-2022. Section 5.1.0 Urban Centres and Section 5.2.0 Retailing (in particular 5.6.3 Clondalkin) of the Draft Plan independently provide policies and objectives for the urban centre and retailing role of Clondalkin.</p> <p>In recognition of the importance and diversity of Clondalkin, the Draft Plan designates Clondalkin as a Town Centre in the Urban Centre Hierarchy with a complimentary 'Town Centre' zoning. Section 5.1.0 of the Draft Plan refers.</p> <p>In terms of retail, Clondalkin is designated as a Level 3 Retail Centre in the Retail Strategy for the GDA and the Draft Plan retail hierarchy. Section 5.6.3 of the Draft Plan outlines the retail policy for Clondalkin and states that it is the policy of the Council to maintain and enhance the Level 3 retailing</p>
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<p>included in the 2010 Development Plan in relation to the retail and town centre functions of Clondalkin would provide clarity on its unique position. (DRAFTDEVPLAN0500, Malachy Bradley, Eastern and Midland Regional Assembly)</p> <p>12. The submission of the Eastern and Midland Regional Assembly notes that established centres of Firhouse, Knocklyon and Palmerstown have had their zoning objectives changed from local centre to district centre to reflect their level of activity and catchments. While they may have a more established nature and role, the retail function of these centres should not be increased to allow for additional floorspace. (DRAFTDEVPLAN0500, Malachy Bradley, Eastern and Midland Regional Assembly)</p> <p>13. Submission received from the Department of Environment, Community and Local Government. Submission notes that the Draft Plan proposes Firhouse, Knocklyon and Palmerstown as additional Level 3 District Centres for retailing. Submission notes the relevant Retail Strategy for the GDA 2008-16 does not designate the locations of Firhouse, Knocklyon and Palmerstown as Level 3 Centres (Town and/or district centre & sub-county town centres); therefore the Draft Plan is not consistent with the Retail Hierarchy of Table E1 of the Retail Strategy for the GDA 2008-16. In addition, submission notes that the retail function of these additional locations above would be out of line with the 3 existing Level 3 centres and their inclusion would adversely affect the promotion of retail development in the county in a strategic and structured manner. Submission therefore recommends removal of the proposed designations of Firhouse, Knocklyon and Palmerstown as Level 3 Retail Centres in the Retail Hierarchy (Section 5.2 and associated Table 5.2) from the Draft Plan as these designations are not consistent with the Retail Hierarchy (Table E1) of the Retail Strategy for the GDA 2008-16 as required by the Planning & Development</p>	<p>function of Clondalkin Town Centre.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Firhouse, Palmerstown & Knocklyon – Level 3 Centres</u> The Chief Executive has considered the contents of the submissions in relation to the designation of these centres to Level 3 in the South Dublin County Retail Hierarchy. The Eastern and Midlands Regional Authority (EMRA) and the Department of Environment, Community and Local Community (DECLG) note that the Firhouse, Palmerstown and Knocklyon centres are designated in the Draft Plan 2016-2022 as Level 3 Retail Centres and that these designations are not consistent with the Retail Hierarchy of the Retail Strategy for the GDA 2008 -2016.</p> <p>In Part 6 of the Retail Strategy for the GDA, the following guidance is provided on what constitutes a District Centre: District centres vary both in terms of the scale of provision and the size of catchment, due to proximity to a major town centre. Where the centre is close to existing major centres, the scale of retail and mixed provision is lower, with the centre range of shops meeting more basic day to day needs and only small scale range of comparison units trading. Such centres would generally cater for a population of 10,000- 40,000.</p> <p>The Retail Planning Guidelines 2012 define a District Centre as follows: 'Provides a range of retail and non-retail service functions (e.g. banks, post office, local offices, restaurants, public houses, community and cultural facilities) for the community at a level consistent with the function of that centre in the core strategy. They can be purpose built as in new or expanding suburbs or traditional district centres in large cities or town'.</p> <p>The centres at Palmerstown, Firhouse and Knocklyon are located in a suburban environment, geographically located between village and town centres with substantial catchment within walking distance. The level of</p>
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Act 2010.

([DRAFTDEVPLAN0183, Minister for Environment, Community & Local Government, Department of the Environment, Community & Local Government](#))

14. Submission received from the Department of Environment, Community and Local Government.

Submission notes that the Urban Hierarchy of the County Development Plan (Figure 5.2) differs from the Retail Hierarchy (Figure 5.3) in that Liffey Valley Shopping Centre is a designated Level 2 Centre in the Retail hierarchy but is not featured in the Urban Hierarchy. Submission notes that, in addition, Clondalkin is one of a number of Level 3 district retail centres (including Rathfarnham, Crumlin, etc) in the County Retail Strategy but is specified with its core retail area in Figure 5.5 (as for Tallaght and Liffey Valley, Level 2 Centres).

Submission requests SDCC to provide a clearer rationale for the omission of Liffey Valley from the Urban Hierarchy and confirmation that Clondalkin is a Level 3 Retail Centre albeit in the context of one of the County's two Town Centres.

([DRAFTDEVPLAN0183, Minister for Environment, Community & Local Government, Department of the Environment, Community & Local Government](#))

5.6.0 Retail Centres

1. Request minor amendment to R6 objective 3 to remove the term 'high density' and 'including departments stores and shopping stores' from the objective.
([DRAFTDEVPLAN0122, John Murphy, BMA Planning, Burris Property Company \(In Receivership\)](#))
2. - Request for Specific Local Objective to remove barriers preventing the planned pedestrian access and permeability to disability services and shops in Ross Court Local Neighbourhood Centre.

activity, range of uses and population catchment aligns with that of a District Centre in the context of the Retail Strategy for the GDA. It has consistently been Council policy to develop the County's District Centres as multi-faceted, mixed-use, higher density urban centres including residential, commercial, recreational, community and retail uses. As such, the application of a District Centre zoning reflects the variety of uses at these locations, which include retail. The Chief Executive acknowledges the concerns in relation the retail function of these centres and the potential to adversely affect the promotion of retail development in the county in a strategic and structured manner. In this context, the retail status of the centres is recommended to be reverted back to a Retail Level 4 status in line with the Retail Strategy for the GDA 2008-2016. However, in terms of the Urban Hierarchy, the District Centre zoning with accompanying policy context set out in Section 5.1.0 shall apply to the centres.

In summary, similar to Clondalkin, the urban and retail role of the centres shall be separated in policy terms and it is recommended that the retail status of Firhouse, Palmerstown and Knocklyon be reverted to a Level 4 in Section 5.2.2 to align with the Retail Strategy for the GDA but the District Centre (DC) zoning be retained to reflect the status of the centres in the communities and provide an appropriate policy context.

Recommendation

It is recommended that the Draft County Development Plan be amended to

- Revert the retail status of Firhouse, Palmerstown and Knocklyon to Level 4 in Section 5.2.2
- Retain the District Centre zoning for the centres and amend Section 5.6.2 and the land use zoning matrix accordingly to differentiate between Level 3 and Level 4 District centres.

Texaco Site on the N81 at Spawell

The Chief Executive notes the content of the submission requesting a SLO to facilitate the enhancement of the retail offering on the site. Permission was granted for a service station and retail provision in a building of 75 sqm under S97A/0377/ PL06S103810. An application to extend the premises by

<p>- Request to continue to promote social inclusion through the planning process by requiring the provision of neighbourhood and community facilities within walking distance of and concurrent to new residential development.</p> <p>- Request to make provision for the economic development of Ross Court and Griffeen Local Neighbourhood Centres, with a level of service provision that meets the needs of the community, and to promote further retail and enterprise development in both areas over Ballyowen Castle which is fully developed.</p> <p>- Request to facilitate delivery of a Primary Health Centre in Ross Court, as an alternative to the already overdeveloped Ballyowen Castle site, to enhance the viability and sustainability of the local, economic and social development of Ross Court retail centre as a community hub.</p> <p>(DRAFTDEVPLAN0274, Lorraine Hennessy, Balgaddy Working Together Group)</p> <p>3. Recognise the important role of image, brand and identity in successful retail/commercial centres.</p> <p>(DRAFTDEVPLAN0188, Robert McLoughlin, Bilfinger GVA, Hines Real Estate Ireland Ltd)</p> <p>4. Amend Section 5.1 to be titled Urban and Retail Centres, include Liffey Valley Major Retail Centre in a newly named 'Urban and Retail Centre Hierarchy' and reword Policy 1 as follows: 'It is the policy of the Council to continue to develop the County's network of town centre, major retail centres, village centres, district centres and local centres, based on the following hierarchy: Tallaght as the County Town; Liffey Valley as a Major Retail Centre; Clondalkin as a vibrant Town Centre; Traditional Village Centres a vibrant and sustainable centres; A network of District Centres to serve a district catchment and A network of Local Centres and local shops to serve a local catchment.'</p> <p>(DRAFTDEVPLAN0188, Robert McLoughlin, Bilfinger GVA, Hines</p>	<p>50 sqm was refused under SD11A/0084. The provision of a site specific objective to enhance the retail element at the Texaco petrol station would be contrary to the Retail Planning Guidelines 2012 which outlines that Petrol filling station shops have a floorspace cap of 100 m2 net, irrespective of the location. The sequential approach to retail development applies to the provision of additional retailing (above the 100m2 cap) at petrol stations and the planning authority would be required to assess the development in the same way as an application for a stand-alone retail development. A SLO to provide additional retail provision at a specific petrol station outside a designated centre would seriously undermine the approach to retail development in the Draft Plan.</p> <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Retail Terminology</u></p> <p>The Chief Executive notes the submissions raising concerns in relation to the terminology in the Plan and requesting a consistent approach to retail terminology throughout the Plan, in particular in relation to comparison shopping and the inclusion of a definition for Hypermarket. The Chief Executive is fully cognizant of the need to promote vitality and competitiveness in the retail sector. It is considered that the Draft Plan 2016-2022 is appropriately robust and flexible in terms of the terminology used in its retail policies and objectives. In this regard it is not considered that the Draft Plan would, in any way, inhibit inward retail investment in the County. In terms of definitions and land use classes, it is noted that the Retail Planning Guidelines 2012 include a definition for Hypermarket as follows:</p> <p>'Single or multi-level self-service store selling both food and a range of comparison goods, with net retail floorspace area in excess of 5,000 M2 with integrated or shared parking'</p> <p>Retail Policy 1 Objective 7 refers to Hypermarket in the content and as</p>
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[Real Estate Ireland Ltd\)](#)

5. It is requested that the Development Plan recognise that the expansion of retail offer and development of infill lands at Liffey Valley have long since been identified as a necessary requirement for the Centre to compete on a like for like basis with other Level 2 centres.
([DRAFTDEVPLAN0188, Robert McLoughlin, Bilfinger GVA, Hines Real Estate Ireland Ltd](#))
6. Submission outlines that additional high quality retail floorspace is required to sustain and enhance the role of Liffey Valley as a Major Retail Centre. It is important that the primacy of the policies and objectives set out in the Development Plan which support the expansion and consolidation of the Major Retail Centre at Liffey Valley are recognised as taking precedence over the current LAP where appropriate.
([DRAFTDEVPLAN0188, Robert McLoughlin, Bilfinger GVA, Hines Real Estate Ireland Ltd](#))
7. Modify description / definition of 'Local Centre' (and 'Village Centre') to clarify floor area reference is to net retail sales area and to clarify that local centre is not necessarily limited to only one supermarket / neighbourhood shop, e.g. as follows: 'These centres usually contain one or more supermarkets / shops-neighbourhood up to a total scale of 2,500 sqm net convenience retail sales area ...'
([DRAFTDEVPLAN0190, Fintan Morrin , The Planning Partnership, Lidl Ireland GmbH](#))
8. Consolidate new retail developments within established retail cores and direct development to established primary shopping streets.
([DRAFTDEVPLAN0221, Ciara Slattery, New Generation Homes](#))
9. Request to replace proposed Section 5.6.2 Liffey Valley Shopping Centre - R4 Objective 3, which states:
'To support the development of retail warehousing within the Liffey

such, it is considered that the definition should be added to Schedule 5 of the Draft Plan and integrated into the Land Use zoning matrix. The content of R1 Objective 7 is noted as it states 'to support, subject to identified need, the development of smaller and medium sized supermarkets in preference to superstore and hypermarket outlets, development of which should be generally limited'. The consideration of Hypermarket as permitted in principle, open for consideration or not permitted in each zone will have regard to the overarching Retail policy in the Draft Plan and be consistent with R1 Objective 7. Furthermore, in the interest of clarity, the Land Use Classes 'Shop – Comparison' and 'Shop - Major Comparison Shops' will be added to the Land Use Classes and assigned permitted in principle, open for consideration or not permitted in each zone in Chapter 11. This assignment will reflect the policies and objectives in the Draft Plan under Section 5.

Recommendation

It is recommended that the Draft County Development Plan be amended to include the definitions of 'Hypermarkets', 'Shop-Comparison' and 'Shop-Major Comparison' in Schedule 5 of the Draft Plan, and that the same be integrated into the Zoning Tables in Chapter 11 of the Draft Plan.

Design of Retail

The content of submissions in relation to the design and layout of retail development is noted. It is considered that Section 11.2.0 Place Making and Urban Design in the Draft Plan 2016-2022 and the Retail Design Manual 2012 (DECLG) provide comprehensive guidance for the design of modern retail developments. Furthermore, in relation to modern retail store design, innovation and attraction, it is considered that R1 Objective 8 addresses the issue. R1 Objective 8 states: 'To review and monitor retail trends that influence the performance of the sector within South Dublin and to encourage and facilitate innovation in the County's retail offer and attraction.'

Recommendation

It is not recommended that the Draft County Development Plan be

<p>Valley Major Retail Centre', with the following: 'To support the development of retail warehousing and a mix of retail type formats within Liffey Valley Retail Park as part of the Liffey Valley Major Retail Centre'. (DRAFTDEVPLAN0124, John Murphy, BMA Planning, Intrust Properties Limited)</p> <p>10. In relation to Section 5.6.1, submission outlines a gap between SLOs for Lucan and Tallaght, with Tallaght not being afforded the same for 'high standard of design'. In relation to Section 5.6.5, submission notes need for SLO to encourage independent traders/craft businesses in villages via business rates incentives. (DRAFTDEVPLAN0261, Gerard Stockil, Tallaght Community Council)</p>	<p>amended.</p> <p><u>Additional Retail (Section 5.3)</u> The Chief Executive notes that a submission outlines that a section of text in Section 5.3 Additional Retail Floorspace undermines the retail policies and objectives of the Draft Plan 2016-2022 to promote retail consolidation and opportunities for new modern retail facilities, in particular the policy context for Liffey Valley as a Major Retail Centre.</p> <p>The subject text in Section 5.3 states: 'Permitted retail developments in Tallaght Town Centre and in Liffey Valley Shopping Centre and the planned centres at Adamstown and Clonburris align with planned population growth and are considered to be sufficient to accommodate population growth and the expenditure needs of these areas.'</p> <p>It is considered that the interpretation that this text restricts future development at Liffey Valley and Tallaght is tenuous and the overall range of retail objectives and policies in the Draft Plan supersede this text, however, in the interest of clarity, the following amendment is recommended: 'The capacity for retail developments in Tallaght Town Centre and in Liffey Valley Shopping Centre and the planned centres at Adamstown and Clonburris align with planned population growth and are considered to be sufficient to accommodate population growth and the expenditure needs of these areas.'</p> <p>Recommendation It is recommended that the Draft County Development Plan be amended to state 'capacity' in lieu of 'permitted' in the wording of Section 5.3 of the Draft Plan.</p> <p><u>Convenience Shops in Residential Areas</u> The Chief Executive notes the submission in relation to the removal of the 'small scale' from R1 Objective 9. The submission outlines that the 'small</p>
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	<p>scale' emphasis may unduly restrict neighbourhood type retailing. The full text of the Objective states:</p> <p>R1 Objective 9: To encourage and facilitate the provision of local small scale convenience shops in residential areas where there is a deficiency of retail provision in the catchment, subject to protecting residential amenity</p> <p>The aim of the objective is to facilitate the provision of small shops on residential zoned areas to serve a local need whilst balancing the need to protect the established residential amenities and the viability of the adjacent urban centres. In the interest of clarity, it is recommended that the objective include the term shop-local to cross reference with the Land Use Classes in the Zoning Matrix and the word 'existing' is added to the context for residential areas. The reference to 'Shop- Local' will provide a cap of 100sqm and ensure that such shops should remain on a scale appropriate to the residential location and to ensure that they align with the Retail Hierarchy of the County Development Plan. The provision of neighbourhood style retailing is directed to 'Local Centre' or other Urban Centre zonings. The provision of new Local Centres may be provided in tandem with residential development on RES-N lands through the Local Area Plans process.</p> <p>Recommendation</p> <p>It is recommended that the wording of Policy R1 Objective 9 of the Draft County Development Plan be amended to the following;</p> <p>R1 Objective 9: To encourage and facilitate the provision of local convenience shops (Shop –Local) in existing residential areas where there is a deficiency of retail provision in the catchment, subject to protecting residential amenity.</p> <p><u>Strategic Development Zones (SDZ)</u></p> <p>The Chief Executive notes the issues raised in the submission in relation to the minor amendment of R6 Objective 3. Overall, the development of Adamstown and Clonburris will be guided by detailed SDZ Planning Schemes approved by An Bord Pleanala. The SDZ process and Planning Scheme stand-alone from the County Development Plan process. As such,</p>
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	<p>it is considered that being prescriptive in terms of the density of the planned District Centre and the nature of the retail mix is not required in the County Development Plan.</p> <p>Recommendation It is recommended that R6 Objective 3 of the Draft County Development Plan be amended to omit the terms 'high density' and 'including department stores and shopping stores'.</p> <p><u>Level 4 Description</u> The Chief Executive acknowledges the submission outlining that the description of Level 4 centres in Table 5.1 may be interpreted to limit the centres to one supermarket only. The relevant text in the Draft Plan 2016-2022 states that 'These centres usually contain one supermarket ranging in size from 1,000-2,500 sq.m....'. This description is taken from the Retail Strategy for the GDA 2008 -2016 and is describes a typical Level 4 centre.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Retail Floor Area Terminology</u> The Chief Executive acknowledges the submission outlining that the floor area measurement for inclusion in the retail definitions in Schedule 5 should be net retail sales area. The Draft Plan 2016-2022 refers to net retail area in the Shop-Major Sales Outlet definition and net retail floorspace in the Shop-Neighbourhood definition. In the interest of clarity and having regard to the Glossary of Terms in the Retail Planning Guidelines 2012, the term net retail floorspace shall be added to the Shop-Major Sales Outlet definition.</p> <p>Net Retail Floorspace is defined in the Retail Planning Guidelines as the area within the shop or store which is visible to the public and to which the public has access including fitting rooms, checkouts, the area in front of checkouts, serving counters and the area behind used by serving staff,</p>
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	<p>areas occupied by retail concessionaires, customer service areas, and internal lobbies in which goods are displayed, but excluding storage areas, circulation space to which the public does not have access to, cafes, and customer toilets.</p> <p>Recommendation</p> <p>It is recommended that the Draft County Development Plan be amended with regard to 'net retail floorspace' in lieu of 'net retail area' in the definition of Shop-Major Sales Outlet, in the interest of consistency with the Retail Planning Guidelines.</p> <p><u>Balgaddy</u></p> <p>The Chief Executive acknowledges the submission in relation to Rosse Court, Balgaddy and notes the raising of issues relating to pedestrian access, provision of community facilities within walking distance, provision for economic development of Rosse Court and Griffeen Local Centre and the facilitation of a Primary Health Centre in Ross Court.</p> <p>With regard to the provision of a post office or a specific primary health care service, the County Development Plan process does not have a function with regard to the selection of occupiers into any retail centres. Having regard to the submission received, the Chief Executive considers that a local centre zoning should be applied at Rosse Court to reflect the cluster of existing units and provide a policy framework and suitable location for the provision of additional services in the area. The provision of a Local Centre zoning objective provides a policy context for the delivery of community facilities and facilitates the economic development and provision of a Primary Health Centre. Under the Local Centre zoning objective, Primary Health Centre, Community Centre, Doctor/ Dentist, Enterprise Centre, Shop-Neighbourhood and Shop- Local are listed as Permitted in Principle.</p> <p>In relation to the access to Local Centres, Urban Centre Policy 1 Objective 7 states that it is the policy of the Council to improve access to the village, district and local centres of the County with particular emphasis on public transport provision and improvements to walking and cycling infrastructure,</p>
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	<p>including disability proofing.</p> <p>Recommendation It is recommended that the Draft County Development Plan map be amended to include a Local Centre (LC) zoning at Rosse Court.</p> <p><u>Sequential Approach</u> A submission requests that 'local centre' be added to the text of RETAIL (R) Policy 2 Sequential Approach' - 'R2 Objective 1'. The text of this objective states:</p> <p>R2 Objective 1: To consolidate the existing retail centres in the County and promote town, village and district centre vitality and viability through the application of a sequential approach to retail development.</p> <p>The objective text aims to consolidate the existing retail centres in the County and this reference includes the local centres of the County. In terms of a direct reference to local centres in the second half of the objective, it is considered acceptable to apply the principles of the sequential test to the location of retail development in local centres to restrict the location of competing retail at 'edge of centre' and 'out of centre' locations adjacent the LC zoning.</p> <p>Recommendation It is recommended that the Draft County Development Plan be amended to include reference to Local Centres in retail Policy 2 Objective 1.</p> <p><u>Trader and Craft Business in Villages</u> The Chief Executive notes the submission in relation to encouraging independent traders/craft businesses in villages via business rates incentives. In Section 5.6.5 Village Centres, the Draft Plan 2016-2022 addresses these issues through the policy of the Council to strengthen the retail, retail services and niche retailing function of traditional villages.</p>
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	<p>With regard to the incentivising business through rates, the County Development Plan process does not have this function.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Design Quality</u> The Chief Executive notes the issue raised in relation to the need for SLOs for Tallaght in Section 5.6.1 in line with those proposed for Lucan to provide for 'high standard of design'. The content of this issue is unclear. The Draft Plan 2016-2022 does not include for a Specific Local Objective relating to a higher standard of design in Lucan. The Draft Plan aims to provide for high quality design across the County.</p> <p>Under Housing Policy 7, Council policy is to ensure that all new residential development within the County is of high quality design and complies with Government guidance on the design of sustainable residential development and residential streets including that prepared by the Minister under Section 28 of the Planning & Development Act 2000 (as amended).</p> <p>Furthermore, Section 11.2.0 Place Making and Urban Design outlines that the Council is committed to ensuring that best practice urban design principles are applied to all new development, based on the principle that well planned and integrated housing, amenities, shops, employment and transport can dramatically enhance the sustainability, attractiveness and quality of an area. A series of Planning Guidance documents have been issued in recent years to promote sustainable place making in different contexts, and this Guidance will inform the future development of South Dublin County.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
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5.7.0 Retail Warehousing & Retail Parks	
<ol style="list-style-type: none"> 1. The potential for an increased retail role/function of Liffey Valley is noted. In the absence of a revised Retail Strategy for the Greater Dublin Area, the TII is concerned with regard to the delivery of public transport elements and the promotion of car dependent retail warehousing use at Liffey Valley. (DRAFTDEVPLAN0060, Tara Spain, Transport Infrastructure Ireland (TII) DRAFTDEVPLAN0506, Tara Spain, Bonneagar Iompair Éireann) 2. Requests that downgrading of Retail Warehousing to 'Open for Consideration' be reversed and that R9 Objective 1 be amended to allow for more flexibility in locating retail warehousing. (DRAFTDEVPLAN0114, Mr. Jamie Rohan (c/o Stephen M. Purcell, Future Analytics Consulting Ltd.) Rohan Holdings Ltd. (c/o Future Analytics Consulting Ltd.), Rohan Holdings Ltd. (c/o Future Analytics Consulting Ltd.), Rohan Holdings Ltd.) 3. Request inclusion of additional objective under Section 5.7.0 Retail Warehousing & Retail Parks as follows: 'R9 Objective 3: To allow only bulky goods to be sold from retail warehousing and retail parks outside the defined core retail areas'. Submission notes need to differentiate, in policy terms, between retail warehousing within established centres and retail warehousing outside such centres, as per the provisions of the Retail Strategy for the Greater Dublin Area 2008-2016. Submission also notes the need to support the controlled evolution of the Liffey Valley Retail Park as a suitable location for a wider mix of retail and store types, including limiting the range of goods permitted to be sold (ie: bulky) and format of units within these retail warehouse developments to safeguard established and larger centres. (DRAFTDEVPLAN0124, John Murphy, BMA Planning, Intrust Properties Limited) 	<p>Chief Executive's Response and Recommendations <u>Retail Warehousing</u></p> <p>The Transport Infrastructure Ireland (TII) note the potential for an increased retail role/function of Liffey Valley and are concerned with the delivery of public transport elements and the promotion of car dependent retail warehousing.</p> <p>Liffey Valley is a designated Level 2 Retail Centre in the Regional Planning Guidelines and the Retail Strategy for the Greater Dublin Area and functions successfully as a regional shopping centre predominantly served by the adjoining national road network. It is considered that the revised policy context for Liffey Valley from a 'Town Centre' to the consolidation of the area as a 'Major Retail Centre' reduces the cumulative intensity of the potential development of the area as wider mixed – use residential, social, civic and commercial elements are now directed elsewhere.</p> <p>In terms of the location of retail warehousing and the request to allow more flexibility in terms of the provision of additional retail warehousing in the County, it is the view of the Chief Executive that any additional retail warehousing must be carefully assessed in view of the significant levels of recent provision and potential impacts on vitality and viability of centres in the County. The Retail Planning Guidelines outline that because the number of retail parks has grown substantially over the past decade, reaching saturation point in some areas, leading to vacancy in some cases, and also because of the blurring of the definition of the goods permitted to be sold in these parks, it is appropriate to reassess the impact of such developments. Due to the fact that the range of goods being sold from retail warehouse parks often includes non-bulky durables, there is potential for a detrimental impact on city/town centres as indicated by the increasing numbers of vacant units in urban centres where retail parks exist on the periphery. It also needs to be recognised that many bulky goods stores such as furniture retailers can and are accommodated in city and town centres.</p> <p>For these reasons there should, in general, be a presumption against further</p>

	<p>development of out-of-town retail parks; however, the development plan and any relevant retail strategies should identify whether or not there is a need for the provision of additional retail warehouses. The Guidelines outline that if a need for additional bulky format retailing is identified by the development plan, the size and potential location of the additional units should also be specified.</p> <p>Retail Policy 9, the associated objectives and the provision of a 'RW' zoning provides a policy context to accommodate a demand for retail warehousing in the County and cluster such uses to minimise traffic generation in accordance with the Retail Planning Guidelines 2012.</p> <p>A submission notes need to differentiate, in policy terms, between retail warehousing within established centres and retail warehousing outside such centres, as per the provisions of the Retail Strategy for the Greater Dublin Area 2008-2016. It is noted that the Liffey Valley Retail Park is included within the Core Retail Area of Liffey Valley, as defined in the Draft Plan 2016-2022. As such, it is considered that the Park is within a retail centre and in accordance with the Retail Strategy for the GDA, a level of flexibility can be applied in allowing types of stores where a mix of bulky and non-bulky goods are sold</p> <p>It is recommended that the following be added to the existing Section 11.3.6(v) Retail Warehousing – Within core retail areas, the Planning Authority will apply a level of flexibility in allowing types of stores where a mix of bulky and non-bulky goods are sold.</p> <p>Recommendation It is recommended that the following text be added to Section 11.3.6(v) Retail Warehousing of the Draft County Development Plan: Within core retail areas, the Planning Authority will apply a level of flexibility in allowing types of stores where a mix of bulky and non-bulky goods are sold.</p>
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5.8.0 Fast Food Outlets/ Takeaways	
<p>1. To remove the reference to 'off licence' in 'RETAIL (R) Policy 11 Off Licences & Betting Offices' - 'R11 Objective 1' and to add a definition for part off-licence use, in Schedule 5: Definition of Use Classes & Zoning Matrix Table of the Draft Plan; (DRAFTDEVPLAN0190, Fintan Morrin , The Planning Partnership, Lidl Ireland GmbH)</p> <p>2. Submission addresses the policy provisions that relate to Fast Food Outlets/Takeaways as set out in Section 5.8.0 and Section 11.3.6 (iii) of the Draft Plan and submits the following:</p> <ul style="list-style-type: none"> -Negative policy on Fast Food Outlets/Takeaways which seeks to restrict the number of fast food outlets/takeaways in an area, while failing to provide an indication of areas that would be appropriate for such developments. -Fast food outlets/ takeaways are not listed in the zoning matrix and this leads to inconsistent decisions and a high level of risk for future investments. -The Draft Plan does not identify appropriate locations for fast food outlets/takeaways but it is usual that most new takeaways are only permitted in designated centres (village centres, district centres, etc.). By only permitting fast food outlets/takeaways in such locations, it is difficult for operators to avoid selecting sites that may be in close proximity to existing fast food outlets/takeaways, conflicting with the objectives in the Draft. As R10 Objective 1 restricts the over-concentration of uses in certain locations, this places new entrants to the market at a competitive disadvantage and, by not defining what it means by 'excessive concentration' (in either number of units compared to other uses or a defined area in which the assessment will be made), it introduces a high level of uncertainty into the site selection and investment process. In this regard, requested that the policy is removed and more certainty is provided with regard to the provision of fast food outlets/takeaways. -It is submitted that R10 Objective 2 will lead to significant difficulties in practice and should be omitted in its entirety and the 	<p>Chief Executive's Response and Recommendations <u>Off Licences</u></p> <p>The submission in relation to Policy RETAIL (R) Policy 11 Off Licences & Betting Offices' and specifically 'R11 Objective 1: To prevent an excessive concentration of off-licence and betting offices' is noted. The submission is concerned that the objective might be misinterpreted and lead to inappropriate restriction on appropriate off licence development, and particularly in relation to 'part off licence', e.g. where alcohol is sold on an ancillary basis in convenience outlets.</p> <p>It is considered that Section 11.3.6(ii) of the Draft Plan 2016-2022 provides further clarity on the implementation of the objective and states 'an over-concentration of certain uses will be discouraged in urban centres, due to an overriding need to maintain the integrity, quality and vibrancy of centres. The Planning Authority will seek to ensure that the quantum of off-licence and betting offices, particularly within smaller centres, is not disproportionate to the overall size and character of the area and that the development would not have a negative impact on the amenity of the area due to noise, general disturbance, hours of operation and litter.'</p> <p>An off-licence use in a convenience store is ancillary to the main retail use and is unlikely to have a negative impact on the amenity of the area due to noise, general disturbance, hours of operation and litter. It is considered that Section 11.3.6 provides a suitable framework for the assessment of off licences on a case by case basis through planning applications, however, an additional line in Section 11.3.6 is proposed to clarify that the provision of an ancillary off licences use in large convenience stores is generally acceptable.</p> <p>Recommendation</p> <p>It is recommended that Section 11.3.6 of the Draft County Development Plan be amended to clarify that the provision of a small section of convenience retail for an ancillary off licences uses is generally acceptable.</p>

<p>appropriateness of the planning system to affect the health of children in this way particularly given the complexities of dietary health is questioned. This policy could have the effect of banning hot food takeaways from almost the entire County, depending on the definition of 'in close proximity' of schools and the policy leaves the definition open to interpretation by any party wishing to demonstrate a particular point.</p> <p>-Diet and the impact of different foods on health is a highly complex matter and should, in our opinion, remain outside the remit of planning, especially where a blunt policy tool such as locational restrictions are imposed without providing any real evidence to justify them.</p> <p>(DRAFTDEVPLAN0191, Paul O'Neill, Bilfinger GVA , Yum Restaurants International Ltd.)</p> <p>3. Submission notes need for additional restrictions on takeaways, with stated limit (ie: 15% of all available retail units in any one village centre, district centre, etc).</p> <p>(DRAFTDEVPLAN0261, Gerard Stockil, Tallaght Community Council)</p>	<p><u>Fast Food Outlets/ Takeaways</u></p> <p>The Chief Executive notes the submissions received in relation to Fast Food Outlet / Takeaways. The policy of the Council as set out in Retail Policy 10 is to manage the provision of fast food outlets and takeaways. Fast food outlets have the potential to cause disturbance, nuisance and detract from the amenities of an area and as such, proposals for new or extended outlets will be carefully considered. For these reasons, the prevention of an excessive concentration of fast food outlets is considered a reasonable approach.</p> <p>In terms of R10 Objective 2, it is acknowledged that the diet and the impact of different foods on health is a highly complex matter and the link to land use planning is tenuous; however, the content of the Local Area Plans-Guidelines for Planning Authorities 2013 (DECLG), is noted and supports the policy position of the Draft Plan in relation to location restrictions in close proximity to schools. The Guidelines outline that planning has an important role to play in promoting and facilitating active and healthy living patterns for local communities. The Guidelines include that ensuring that exposure of children to the promotion of foods that are high in fat, salt or sugar is reduced such as the careful consideration of the appropriateness and or location of fast food outlets in the vicinity of schools and parks as an example of promoting active and healthier lifestyles. The Draft Plan extrapolates this guidance for local area plans to the wider County through R10 Objective 2. The implementation of this objective will be on a case by case basis through the development management system. Furthermore, it is considered that the provisions of Section 11.3.6 provide adequate considerations to enable assessment.</p> <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p>
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Chapter 5 Summary of Recommended Amendments to the Draft Plan

Section	Response Issue	Recommendation
5.1.0 Urban Centres	Ballycullen/ Firhouse and Balgaddy	It is recommended that the Draft County Development Plan be amended to include a Local Centre (LC) zoning at Rosse Court.
5.2.0 Retailing, 5.3.0 Additional Retail Floor Space & 5.6 Retail Centres	Firhouse, Palmerstown & Knocklyon – Level 3 Centres	It is recommended that the Retail status of Firhouse, Palmerstown and Knocklyon be reverted to Level 4 in Section 5.2.2 of the Draft County Development Plan. Retain the District Centre zoning for these centres and amend Section 5.6.2 and the land use zoning matrix accordingly to differentiate between Level 3 and Level 4 District centres.
5.2.0 Retailing, 5.3.0 Additional Retail Floor Space & 5.6 Retail Centres	Retail Terminology	Add definitions for 'Hypermarkets', 'Shop – Comparison' and 'Shop – Major Comparison' to Schedule 5 and integrate the Land Use Classes into the Zoning Tables in Chapter 11
5.2.0 Retailing, 5.3.0 Additional Retail Floor Space & 5.6 Retail Centres	Additional Retail	Minor amendment to the wording in Section 5.3 to replace the wording 'permitted' with 'capacity'.
5.2.0 Retailing, 5.3.0 Additional Retail Floor Space & 5.6 Retail Centres	Convenience Shops in Residential Areas	It is recommended that the wording in Policy R1 Objective 9 of the Draft County Development Plan be amended to the following; R1 Objective 9: To encourage and facilitate the provision of local convenience shops (Shop –Local) in existing residential areas where there is a deficiency of retail provision in the catchment, subject to protecting residential amenity.
5.2.0 Retailing, 5.3.0 Additional Retail Floor Space & 5.6 Retail Centres	Strategic Development Zones (SDZ)	Amend the wording in R6 Objective 3 to omit the terms 'high density' and 'including department stores and shopping stores'.

5.2.0 Retailing, 5.3.0 Additional Retail Floor Space & 5.6 Retail Centres	Retail Floor Area Terminology	It is recommended that the Draft County Development Plan be amended with regard to 'net retail floorspace' in lieu of 'net retail area' in the definition of Shop-Major Sales Outlet, in the interest of consistency with the Retail Planning Guidelines.
5.2.0 Retailing, 5.3.0 Additional Retail Floor Space & 5.6 Retail Centres	Balgaddy	Amend the County Development Plan Maps to include a Local Centre (LC) zoning at Rosse Court.
5.2.0 Retailing, 5.3.0 Additional Retail Floor Space & 5.6 Retail Centres	Sequential Approach	Amend the County Development Plan to include reference to Local Centres in retail Policy 2 Objective 1.
5.7.0 Retail Warehousing & Retail Parks	Retail Warehousing	It is recommended that the following be added to Section 11.3.6(v) Retail Warehousing – Within core retail areas, the Planning Authority will apply a level of flexibility in allowing types of stores where a mix of bulky and non-bulky goods are sold.
Section 11.3.6	Off Licence	It is recommended that Section 11.3.6 of the Draft County Development Plan be amended to clarify that the provision of a small section of convenience retail for an ancillary off licences uses is generally acceptable.

CHAPTER 6 - TRANSPORT AND MOBILITY

<p>6.0 Introduction</p> <p>1. NTA requests that their statutory role in long terms strategic transport planning in the GDA be highlighted. (DRAFTDEVPLAN0209, Tadhg MacNamara, National Transport Authority)</p>	<p>Chief Executives Response and Recommendation</p> <p>The remit of the National Transport Authority (NTA) is to regulate and develop the provision of an integrated public transport services (bus, rail, light rail and small public service vehicle services including taxis, hackneys and limousines) by public and private operators in the State, to secure the development and implementation of an integrated transport system within the Greater Dublin Area, and to contribute to the effective integration of transport and land use planning across the State.</p> <p>It is also important to note, that since the Draft Plan 2016-2022 was published the NTA has issued the Draft Transport Strategy 2016-2035 for the Greater Dublin Area. The Draft Transport Strategy has informed, and been informed by, the preparation of the Draft Plan.</p> <p>Recommendation</p> <p>It is recommended that Section 6.2.0 <i>Public Transport</i> of the Draft County Development Plan be modified to acknowledge the NTAs role in the provision of public transport services.</p>
<p>6.1.0 Overarching Policies & Objectives</p> <p>1. Concern raised in relation to absence of reference to walking and cycle infrastructure in overarching objectives (6.1.0) and absence of proposals for walking and cycling infrastructure improvements under 6.1.2. (DRAFTDEVPLAN0336, Mairead Forsythe, Dublin Cycling Campaign) DRAFTDEVPLAN0222, Mairead Forsythe, Dublin Cycling Campaign)</p>	<p>Chief Executives Response and Recommendation</p> <p>There are several references to ‘sustainable’ modes of transport within Section 6.1.0 of the Draft Plan 2016-2022 and the policies/policy objectives continued therein. The use of the term ‘sustainable’ is made in reference to public transport, cycling and walking. The definition of ‘sustainable’ modes can be expanded for greater clarity.</p> <p>Section 6.1.2 refers to a number of the issues that Integrated Transport Studies address and provides some examples of the types of infrastructure requirements that support this. This would include a number of specific works aimed at increasing pedestrian and cyclist mobility.</p>

	<p>Recommendation</p> <p>It is recommended that the Draft County Development Plan be amended as follows:</p> <ol style="list-style-type: none"> 1. That Section 6.1.0 <i>Overarching</i> of the Draft Plan be modified to clarify that sustainable modes include public transport, cycling and walking. 2. That Section 6.1.2 <i>Integrated Transport Studies</i> of the Draft Plan be modified to make reference to some of the specific works required to improve pedestrian and cyclist mobility.
6.2.0 Public Transport	
<ol style="list-style-type: none"> 1. Requests that the Council set out designated transport routes which will link the Balgaddy communities to services such as shops, schools, hospitals, playgrounds, work and vital services and calls for the recognition of: • The reliance of different sections of the community on public transport • Members of the community travelling outside of their locality to access basic services • Social inclusion by promoting the development of a bus service which will meet the needs of the people living in the community. (DRAFTDEVPLAN0043, Lorraine Hennessey, Balgaddy Working Together Group) 2. Requests that more bus routes are made available for the Ballycullen area and in particular the provision of a turning circle along the Oldcourt Road. (DRAFTDEVPLAN0046, Louise Purcell) 3. ET8 Objective 3 should be subject to a requirement for appropriate integrated mobility and event management planning. (DRAFTDEVPLAN0060, Tara Spain, Transport Infrastructure Ireland (TII) DRAFTDEVPLAN0506, Tara Spain, Bonneagar Iompair Éireann) 4. TII welcomes the mapping of emerging preferred routes for Luas Lucan and Metro West and recommends that the mapping of 	<p>Chief Executives Response and Recommendation</p> <p>The Chief Executive has carefully considered the issues raised in relation to Public Transport and provides responses and recommendations under the following subheadings:</p> <ul style="list-style-type: none"> ▪ New/Enhanced Services <ul style="list-style-type: none"> ○ Citywest-Lucan Orbital Corridor ○ Metro-west ○ Saggart – Hazelhatch Railway ○ Tallaght Swiftway Extension to Dundrum and/or Sandyford ▪ Access to Services ▪ Park and Ride Facilities ▪ Bicycle Parking ▪ Noise <p><u>New/Enhanced Services</u></p> <p>The provision of public transport services within the County is the remit of the NTA. In October 2015 the NTA published the Draft Transport Strategy 2016-2035 for the Greater Dublin Area. The Draft Transport Strategy has informed, and been informed by, the preparation of this Draft Plan 2016-2022.</p> <p>The Draft Transport Strategy includes several initiatives that will directly benefit the County and provide direct linkages between all major towns and villages in the County, notably:</p>

<p>stations/stops be included together with reference to park and ride facilities. (DRAFTDEVPLAN0060, Tara Spain, Transport Infrastructure Ireland (TII) DRAFTDEVPLAN0506, Tara Spain, Bonneagar Iompair Éireann)</p> <p>5. It is recommended that an objective be included in the County Development Plan to undertake a study to address accessibility and permeability issues in the vicinity of the Luas Red and Citywest Line, which should be carried out in partnership between SDCC, TII and NTA. (DRAFTDEVPLAN0060, Tara Spain, Transport Infrastructure Ireland (TII) DRAFTDEVPLAN0506, Tara Spain, Bonneagar Iompair Éireann)</p> <p>6. The proposal to investigate a rail corridor between Saggart and Hazelhatch is considered to be questionable in the context of the rural catchment of the area. (DRAFTDEVPLAN0104, Warren Whitney)</p> <p>7. It is difficult to see the purpose of the proposal to investigate the availability of a site for a park and ride facility in Clondalkin in the context of the existing facility at the Red Cow; the absence of plans for a rail or swiftway from Clondalkin to the City and the absence of high frequency bus route. It would be difficult to find a suitable site for a Park and Ride facility in Firhouse/Knocklyon without infringing on open space. (DRAFTDEVPLAN0104, Warren Whitney)</p> <p>8. The Metro West project is unlikely to materialise in the form previously envisaged and the term should be omitted from Figure 6.1 in favour of a more general LRT/BRT Corridor term. (DRAFTDEVPLAN0122, John Murphy, BMA Planning, Burris Property Company (In Receivership))</p> <p>9. Submission on behalf of Knocklyon Network outlines the benefits of</p>	<ul style="list-style-type: none"> ▪ Completion of the Interconnector providing for DART services along the Dublin-Kildare rail route. ▪ A new Luas line commencing in the residential areas of Lucan to the south of the N4 connecting to the city centre. ▪ Bus Rapid Transit connecting Tallaght to the city centre via Rathfarnham. ▪ Core Radial Corridors for high frequency bus services commencing in Tallaght, Clondalkin and Lucan connecting to the City Centre. ▪ Core Orbital Corridors for high frequency bus services including connections from Tallaght to Blanchardstown (via Clondalkin and Liffey Valley) and Tallaght to Dundrum/UCD (via Rathfarnham). ▪ Regional bus services along the N7 passing by Rathcoole and Saggart. <p>Provision for a number of these services are made within the Actions listed under (TM) Policy 2 Public Transport. It should be noted that all routes are indicative at this stage and will be the subject of a final route selection process (including the location of any stations/stops), detailed design and planning procedures.</p> <p>In additional to the services listed above the Draft Plan also proposes a number of other routes to service the County. These are discussed below individually.</p> <p><i>Citywest-Lucan Orbital Corridor</i> (TM) Policy 2 Public Transport includes an Action stating that the Council will:</p> <p style="padding-left: 40px;">‘Identify an orbital corridor for high frequency public transport services between Citywest and Lucan (through the Grange Castle and Newcastle employment areas). The feasibility and alignment of this route will be the subject of a detailed study linked to the development of a transport strategy for the Greater Dublin Area’.</p> <p>This route has not been included within the Draft Transport Strategy. The NTA have advised via email (dated 12/11/15) that the preferred option for orbital routes is via Belgard Road / Fonhill Road corridor for investment,</p>
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<p>the Tallaght Swiftway and requests that it be routed to utilise either the Spawell Bridge or the Templeogue bridge for reasons given. (DRAFTDEVPLAN0180, Eugene Barrett, Knocklyon Network Ltd.)</p> <p>10. The action under Policy 2 Public Transport to maintain a reservation along the Emerging Preferred Route for Metro-West is noted and it is submitted that this is likely to result in sterilisation of land, promote land-banking, and raise false expectations in the context that the MetroWest Rail order has been withdrawn. This requires re-evaluation. (DRAFTDEVPLAN0268, Doireann NiCheallaigh, An Taisce)</p> <p>11. Concerns raised in relation to absence of measures to encourage inter modal travel including bicycle parking at public transport stops and provision for bicycles on carriages (DRAFTDEVPLAN0336, Mairead Forsythe, Dublin Cycling Campaign DRAFTDEVPLAN0222, Mairead Forsythe, Dublin Cycling Campaign)</p> <p>12. Submission relates to five sites located at and adjacent to the Naas Road and Long Mile Road junction. Submission requests reinstatement of objective to provide an additional Luas stop(s) along the Naas Road corridor, as identified under the Naas Road Framework Plan and current South Dublin County Development Plan 2010-2016 [SLO52], as follows: 'To facilitate the enhancement of the existing Red Luas Line between the Kylemore and Red Cow Stops along the Naas Road through the provision of additional stop(s) at appropriate locations to be agreed with the relevant National Agency. If necessary, the Council shall also prepare and implement a special financial contribution scheme to support the delivery of such proposals.' (DRAFTDEVPLAN0081, Declan Brassil, Declan Brassil & Co., Harris Group of Naas Road)</p> <p>13. Submission requests recognition that Iarnród Éireann rail operations and activities will sometimes result in environmental</p>	<p>however this does not preclude the investment in bus services on the Outer Ring Road corridor as set out in the Draft Plan.</p> <p><i>Metro-west</i> (TM) Policy 2 Public Transport includes an Action stating that the Council will: ‘Maintain a reservation along the Emerging Preferred Routes, as identified by the Railway Procurement Agency, for the Lucan Luas (linking Lucan, Liffey Valley and the City Centre) and the Metro-West (linking Tallaght, Clondalkin, Liffey Valley, Blanchardstown, Ballymun, Dublin Airport and Swords) for the future provision of high frequency public transport services’</p> <p>The Metro West proposal has not been included within the Draft Transport Strategy; however a Core Orbital Corridor commencing in Tallaght connecting to the Blanchardstown that generally follows the alignment of the former Metro-West corridor has been included. A detailed route selection and design process will determine how the reservation is utilised.</p> <p><i>Saggart – Hazelhatch Railway</i> (TM) Policy 2 Public Transport includes an Action stating that the Council will: ‘Investigate a future public rail transport corridor between Saggart and Hazelhatch, linking the greater Tallaght area to the west via Saggart/Citywest, Greenogue/Baldonnell & Newcastle, facilitating future sustainable development’.</p> <p>This route has not been included within the Draft Transport Strategy. In its submission on the Draft Plan 2016-2022 the NTA has acknowledged that whilst it is in the remit for Council to pursue any objectives as it deems appropriate ‘the feasibility and desirability of a new heavy rail line between Tallaght and Saggart is not clear and is not being considered by the Authority’.</p> <p>Concerns are also raised with regard to the identification of this route in that it would also increase pressure to zone land for development in an area that</p>
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<p>noise emissions and, subject to adherence to statutory requirements, such operations and activities should not be unreasonably restricted due to land use changes in the future. (DRAFTDEVPLAN0501, Brian Wylie, Iarnród Éireann)</p> <p>14. Submission requests that planning applications with potential to impact on the railway, including noise impact on receptors as a result of rail operations, should be referred to Iarnród Éireann for review and comment prior to any decision by the Planning Authority. (DRAFTDEVPLAN0501, Brian Wylie, Iarnród Éireann)</p> <p>15. Submission requests review of local bus routes to improve connections between villages and Tallaght, and the airport. (DRAFTDEVPLAN0170, Neville Graver, Rathcoole Community Council Limited)</p>	<p>has not been identified for growth within the core strategy.</p> <p><i>Tallaght Swiftway Extension to Dundrum and/or Sandyford</i> (TM) Policy 2 Public Transport includes an Action stating that the Council will:</p> <p>‘work with the NTA to finalise the route of the Tallaght Swiftway (Bus Rapid Transport) between Rathfarnham and Tallaght (and its possible future extension to Dundrum and/or Sandyford)’</p> <p>This route has not been included within the Draft Transport Strategy. The NTA has acknowledged that whilst it is in the remit for Council to pursue any objectives as it deems appropriate ‘No possible future extension of BRT from Tallaght to Dundrum / Sandyford has been identified’. It is noted however the Core Orbital Corridor between Tallaght and Dundrum/UCD will intersect with another Core Orbital Corridor between Dún Laoghaire and Dundrum. This will effectively service the route envisaged for BRT within the Draft Plan.</p> <p><i>Luas Station between Kilemore and Red Cow</i> Provision is made for an additional Luas in this location within the Naas Road Development Framework (to the east of the junction of the Naas Road and Long Mile Road). This SLO was removed as part of the review of the current Plan 2010-2016. It is noted that neither the NTA or TII have requested the reinstatement of the SLO.</p> <p>Recommendation: It is recommended that Actions under (TM) Policy 2 of the Draft County Development Plan be modified to:</p> <ol style="list-style-type: none"> 1. Make reference to the Core Bus Networks 2. Omit the reference to the extension of the BRT from Tallaght to Dundrum / Sandyford. 3. Omit the Action referring to a future public rail transport corridor between Saggart and Hazelhatch. 4. That the word ‘former’ be inserted prior to any references to Metro-west.
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	<p><u>Access to Services</u> See 6.3.0 Walking and Cycling, below.</p> <p><u>Park and Ride Facilities</u> (TM) Policy 2 Public Transport includes an Action stating that the Council will:</p> <p style="padding-left: 40px;">‘Facilitate the provision of Park and Ride facilities in appropriate locations at transport nodes and along strategic transport corridors’</p> <p>This is further detailed in Section 6.2.1 Park and Ride Facilities and Table 6.3 which identifies park and ride locations within the County. With regard to park and ride facilities within Clondalkin and Firhouse/Knocklyon it is stated, respectively, that:</p> <ul style="list-style-type: none"> ▪ ‘Availability of a site for the provision of a multi-storey carpark to be investigated’ ▪ ‘Potential for a site to be investigated along the finalised route of the Clongriffin to Tallaght Swiftway project’ <p>Any detailed proposals that are pursued following an investigation will be the subject to the relevant planning process (Such as Part 8), including public consultation. As the location of all proposed Park and Ride facilities are approximate, it would not be appropriate to illustrate same on Draft Plan Maps.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Bicycle Parking</u> Section 11.4.1 of the Draft Plan 2016-2022 sets out Minimum Bicycle Parking rates for all new development in the County. It is also noted within the section that:</p> <p style="padding-left: 40px;">‘The Council will also seek to provide additional opportunities for the provision of bicycle parking facilities along public transport routes and within town and village centres, parks and other areas of civic</p>
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	<p>importance'</p> <p>The provision of bicycle facilities on trains is the remit of the NTA and Irish Rail.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Noise</u> One of the Actions listed under (TM) Policy 5 Traffic and Transport Management of the Draft Plan 2016-2022 is: 'Ensure that appropriate design and mitigation measures are applied to all transport schemes to reduce the impact of noise and air pollution within residential communities in accordance with the EU directive on Assessment and Management of Environmental Noise'. This outlines Council's obligations in relation noise generated along the heavy rail corridors.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
6.3.0 Walking and Cycling	
<ol style="list-style-type: none"> 1. Absence of pedestrian and cyclist access to Liffey Valley Shopping Centre and absence of cycle parking thus creating a car orientated development that contributes to traffic problems. (DRAFTDEVPLAN0001, Paul Corcoran) 2. Need for improved cycling and pedestrian access in the community linking in with healthy Ireland framework document. (DRAFTDEVPLAN0005, Paul Corcoran, DIT, Paul Corcoran) 3. Request the provision of one or more pedestrian bridges across the 	<p>Chief Executives Response and Recommendation The Chief Executive has carefully considered the issues raised in relation to Walking and Cycling and provides responses and recommendations under the following subheadings:</p> <ul style="list-style-type: none"> ▪ Accessibility and Links <ul style="list-style-type: none"> ○ <i>Grand Canal Greenway</i> ○ <i>Kingswood and Kilnamanagh</i> ○ <i>Liffey Valley</i> ○ <i>M50 Bridge (Knocklyon, Firhouse Area)</i> ○ <i>River Liffey Bridges</i>

<p>M50, in particular between Stockingwood and Woodfield, to provide direct access to facilities and amenities without the necessity of using motorised vehicles. This would support the NTA Greater Dublin Cycle Network. (DRAFTDEVPLAN0023, Fergal Daly)</p> <p>4. Request a pedestrian footpath along the Kiltipper Road from Killinarden Crossroads to Ellensborough Estate to facilitate land zoned for housing and access to Kiltipper Park. (DRAFTDEVPLAN0024, Gary Tyrrell)</p> <p>5. Need for a pedestrian crossing on Wheatfield Road between Kennelsfort Junction and Turret Road junction to ensure a safe crossing for those who walk or cycle to school on Wheatfield Road. (DRAFTDEVPLAN0048, Alicja Cichocka)</p> <p>6. Need for a pedestrian path from Ely Close, connecting Ely Estate, to St Annes GAA Club playing pitches in lieu of existing route for players across dangerous Bohernabreena Road. (DRAFTDEVPLAN0051, Fergus Walsh, St Annes GAA Club)</p> <p>7. Requests the immediate removal of all barriers which prevent pedestrian access to Rosse Court from estates such as Foxdene, Meile an Rí, Tor an Rí abd Burg an Rí. (DRAFTDEVPLAN0043, Lorraine Hennessey, Balgaddy Working Together Group)</p> <p>8. Requests the installation of a pedestrian crossings on Ballycullen Road, with specific reference to the upper part of Ballycullen Road, a) at the roundabout just past the Woodstown Shopping Centre and b) at the next roundabout at the junction with Stocking Avenue and Hunters Road where it is difficult for pedestrians to cross the road and access amenities safely. (DRAFTDEVPLAN0044, Niall Dowling)</p> <p>9. Suggests that there are not enough cycling lanes within the County</p>	<ul style="list-style-type: none"> ○ <i>Rosse Court</i> ○ <i>St Anne's GAA Club</i> ○ <i>Tubber Lane</i> ○ <i>Templeogue Village</i> <ul style="list-style-type: none"> ▪ Design of Facilities ▪ Health Benefits of Walking and Cycling ▪ Walking in Rural Areas ▪ Cycling and Walking Officers ▪ Bicycle Parking ▪ Enforcement ▪ Mapping ▪ References to Other Plans ▪ Minor Works <p><u>Accessibility and Links</u> (TM) Policy 3 Walking and Cycling of the Draft Plan 2016-2022 includes a number of objectives that seek to increase pedestrian and cyclist accessibility to key services and locations. One of the listed Actions of this policy is to:</p> <p style="padding-left: 40px;">‘Reduce walking and cycling distances to areas of employment, community services, schools, shops, public transport and other community facilities through the delivery of Local Permeability Improvements within existing communities’</p> <p>This Action is further detailed Section 6.3.2 Local Permeability Improvements which make reference to work undertaken in conjunction with the NTA. This included the preparation of the Appraisal and Prioritisation of Proposed Permeability Projects Study, which examines levels of connectivity within communities and identifies potential walking and cycling links within communities throughout the County.</p> <p>(TM) Policy 3 Walking and Cycling of the Draft Plan also contains a number of objectives that seek to improve cyclist mobility across the County. A number of Actions listed under this policy also refer to the implementation of additional cycle links, namely to ‘work with the NTA to assist and secure funding for the ongoing implementation of the County Strategic Cycle</p>
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<p>and that where there are cycle lanes that they are poorly maintained (specifically lanes around Tallaght Leisure Centre towards Citywest). (DRAFTDEVPLAN0046, Louise Purcell)</p> <p>10. Request to investigate the possibility of extending the Green Route alongside the Grand Canal, between the locks at Lucan & Hazelhatch to provide a cycling and walking route, in addition to a new option for commuters travelling to the City Centre or ParkWest & CityWest business campuses. This route would then extend from Dublin city centre all the way to Arthur's Way and Ardcrough in County Kildare. The current towpath is susceptible to flooding and as such is a redundant amenity for much of the year. The existing towpath is also unsuitable for cycling and should be upgraded to the high standard of the Green Route which opened in 2010 between Lock 3 and Lock 12. (DRAFTDEVPLAN0094, Shane O'Brien)</p> <p>11. Requests that Tubber Lane be made into a cycle route as part of the NTA network, instead of, or at least in addition to, cycle routes proposed alongside the Lucan by-pass and similar. (DRAFTDEVPLAN0069, Colm O'Brien)</p> <p>12. Outlines that main road type cycle routes are noisy, polluted, and simply downright dangerous and should be avoided whenever possible by the majority of cyclists. Prioritise spending on quieter, safer and more pleasant routes. (DRAFTDEVPLAN0069, Colm O'Brien)</p> <p>13. Supports TM3 Objective 1 '...link communities to key destinations, amenities and leisure facilities'. An example of an amenity that is not currently linked to communities is the Grand Canal Way Green Route. Raises concerns in relation to the inclusion of the wording "...respecting the wishes of local communities" in TM3 Objective 2 as the majority of "local communities" use private cars as their</p>	<p>Network'.</p> <p>Table 6.4 - Six Year Cycle Network Programme nominates Council's priorities for the implementation of the Strategic Cycling Network. This will provide for new links along a variety of roads and streets (including the upgrade of existing links which are assessed to be inadequate), including Green Routes which generally pass through interlinked areas parklands that form part of the County's open space network.</p> <p>Local communities have been engaged via various consultation processes during the preparation of all cycle network and permeability projects carried out to date in the County. This process included consultation undertaken at an early stage to allow findings to be considered prior to detailed designs being proposed.</p> <p>With regard to future studies, SDCC would welcome the review and expansion of the Initial Appraisal Document via a 'whole of catchment' multi-agency approach that closely links all major public transport services to permeability projects such as those funded through the Green School/ Sustainable Transport Measures Grants (STMG) process.</p> <p>Accessibility issues and the provision of new routes for more specific locations are discussed below:</p> <p><i>Grand Canal Greenway</i> As part of the development of the Grand Canal Greenway, several connections to/from existing communities where upgraded with new paths, lighting and kissing gates. A new bridge crossing linking the Grand Canal to Griffeen Valley Park was also completed in 2011. Further connections/upgraded cycle paths have also been identified within (TM) Policy 3 Walking and Cycling in regard to the Strategic Cycling Network, including the extension of the Grand Canal Greenway to Hazelhatch within the Six Year Cycle Network Programme (Table 6.6).</p> <p>At the local level a number of additional feeder routes have also been identified within the Greater Dublin Area Strategic Cycle Network Plan which</p>
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<p>primary mode of transport and will not agree to, or vote for, any new measures that will inconvenience them/slow their own journey, regardless of the overall benefit to the community. Requests the wording of TM3 Objective 2 be revisited. "Respecting the wishes of local communities" could be rephrased to state "respecting the wishes of pedestrians and cyclists" or "following consultations with pedestrians and cyclists".</p> <p>Supports and agrees with TM3 Objective 3 & 4, the Actions & Section 6.3.4 In particular, the use of "logical and continuous"; "direct" and "comfort";</p> <p>"logical and continuous" A white line indicating a cycle path, painted on a footpath, that crosses multiple minor roads/housing estate entrances is not an acceptable cycle path. Continuous cycle paths on the road, marked by a different colour, are, by far, the safest and best solution for cyclists.</p> <p>"direct" A cycle path that forces a cyclist to take a diversion that increases a commuting journey time is not "direct"</p> <p>"Comfort" Where new cycle paths are built, the surface quality needs to be of the same standard as that of a road. The cycle path on the Adamstown Link road demonstrates an issue with varying cycle path surface standard. The first 50-100metres of this cycle path, heading out of Adamstown, is extremely bumpy. Cyclists can not use this section. The rest of the >1km cycle path is of excellent quality and can be used. Many cyclists do not use it however, because the first section has been laid so badly.</p> <p>(DRAFTDEVPLAN0071, Michele Uí Bhuachalla)</p> <p>14. Submission advocates for the construction of the Lutyens footbridge over the Liffey, connecting the war memorial in the Phoenix park to that in Island Bridge. It would be very appropriate if this could be completed before the centenary of the end of first world war-2018.</p> <p>(DRAFTDEVPLAN0236, John Bielenberg)</p> <p>15. NTA recommends that objectives contained in Section 6.3 be amended to make reference to the GDA Cycle Network Plan and</p>	<p>can be implemented over the medium to longer term.</p> <p>A further pedestrian/cycle link was also identified in the Appraisal and Prioritisation of Proposed Permeability Projects Study from Bawnogue to the Grand Canal. This link will be looked at in greater detail in the short to medium term.</p> <p><i>Kingswood and Kilnamanagh</i> The Appraisal and Prioritisation of Proposed Permeability Projects Study identifies a number of links in Kingswood and Kilnamanagh that would improve access to the Luas Red Line (see Section 6.2.0 Public transport, above).</p> <p><i>Liffey Valley</i> One of the Actions listed under (TM) Policy 1 Overarching is to: ‘Prepare a Local Access Study for the Liffey Valley Town Centre that also incorporates the Palmerstown, North Clondalkin and South Lucan communities and that takes full account of the need to regulate motorised traffic within these communities relative to the Liffey Valley Town Centre, no later than two years after the 2016-2022 County Development Plan is approved’</p> <p>Section 6.1.2 – Integrated Area Studies of the Draft Plan 2016-2022 outlines the issues such a study would need to address. This includes ‘the existing network, investigating movement around and through the defined area with the aim of optimising accessibility for all modes of transport, and in particular sustainable modes’ and ‘the development of networks that maximise connectivity and ease of movement for all modes including vehicles, cyclists and pedestrians’.</p> <p><i>M50 Bridge (Knocklyon, Firhouse Area)</i> It is acknowledged that the M50 is a major barrier to pedestrian and cyclist mobility; however the provision of a new bridge would be a significant cost that would only be warranted if it was identified to be of a strategic value.</p> <p>The Greater Dublin Area Strategic Cycle Network identifies the strong strategic desire lines for pedestrian and cyclist movement within the County.</p>
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<p>'Permeability: A Best Practice Guide'. It is also recommended that an objective be inserted that requires study into addressing permeability and access to Luas stops. (DRAFTDEVPLAN0209, Tadhg MacNamara, National Transport Authority)</p> <p>16. Include reference to National Cycle Manual under TM Policy 6. (DRAFTDEVPLAN0209, Tadhg MacNamara, National Transport Authority)</p> <p>17. Place more of an emphasis on slow modes of transport in built up areas and provide for reduced traffic speeds, redesign of junctions, increased space for cyclists and pedestrians and dedicated hard shoulders for cyclists. Amend TM3 Objective 1 to require separation of the network of pedestrian and cycle routes from vehicular routes. (DRAFTDEVPLAN0212, Doireann Ni Cheallaigh, An Taisce)</p> <p>18. Submission endorses the HCL 3 SLO 1: To support and facilitate the refurbishment of the Metal Bridge in Palmerstown as this would be a key gateway to encourage more adventure tourism into the area, specifically walkers and cyclists. (DRAFTDEVPLAN0175, Shane Cronin, PD Adventure Sports Limited)</p> <p>19. Concerns raised in relation to absence of inclusion Templeogue Village in Table 6.4 (6 year Cycle Network Programme). It is recommended that the listed Liffey Valley Greenway should connect with routes north of the Liffey via the 'Silver Bridge' and that a pedestrian and cycle routes should be provided between Laraghcon and St. Catherine's Park. (DRAFTDEVPLAN0336, Mairead Forsythe, Dublin Cycling Campaign DRAFTDEVPLAN0222, Mairead Forsythe, Dublin Cycling Campaign)</p> <p>20. Concern raised in relation to absence of reference to the NCPF under 6.4.3 (Road and Street Design).</p>	<p>At the local level such links can be identified by studies undertaken in the preparation of Local Permeability Improvements (as per Section 6.3.2 of the Draft Plan 2016-2022), or via the LAP process.</p> <p>No new M50 crossing were identified in the Stocking Lane area as part of the preparation of these documents.</p> <p>With regard to the existing bridge at Junction 12 (Firhouse/Knocklyon exit), this was recently upgraded to include a separate pedestrian and cycle bridge (containing a two way cycle lane) adjacent to the road crossing. It is acknowledged that movement for pedestrians and cyclists across the M50 junctions can be intimidating due to the presence of fast moving/high volumes of traffic, however, these facilities have been designed to enable safe pedestrian and cycle access.</p> <p><i>River Liffey Bridges</i> The metal bridge, known as Farmleigh Bridge (and several other names including the Guinness Bridge, Strawberry Beds Bridge and Silver Bridge), does not form a part of the County Strategic Cycle Network (as informed by the National Transport Authority's Greater Dublin Area Strategic Cycle Network). It will however provide an important link for cyclists and pedestrians as a feeder route to the Liffey Valley Greenway from the Strawberry Beds area. This is recognised by HCL 3 SLO 1 which states: 'To support and facilitate the refurbishment of the Metal Bridge in Palmerstown'</p> <p>Laraghcon and St. Catherine's Park (and any direct route between these areas) are located within the administrative area Fingal County Council. It should be noted, however, that a crossing over the River Liffey is proposed as part of the Liffey Valley Greenway between St Catherine's Park lands to the south.</p> <p>The proposed Lutyens footbridge location is within the administrative area of Dublin City Council</p>
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<p>(DRAFTDEVPLAN0336, Mairead Forsythe, Dublin Cycling Campaign DRAFTDEVPLAN0222, Mairead Forsythe, Dublin Cycling Campaign)</p> <p>21. Concerns raised by a Residents Association that the arrangement for pedestrians crossing the M50 Junction 12, Firhouse/Knocklyon exit is proving too dangerous for residents. Request a pedestrian bridge be constructed. (DRAFTDEVPLAN0263, Graham Owens, Glenlyon Residents Association)</p> <p>22. Request an objective for the completion of footpath from Old Bawn to Fort Bridge and to the entrance to Kiltipper Park to improve road safety. (DRAFTDEVPLAN0326, Joseph Scully)</p> <p>23. Requests that secure bicycle parking is provided within parks adjacent to playing pitches at accessible and supervisable locations (DRAFTDEVPLAN0360, Jim Brogan, Jim Brogan, Dublin GAA County Board)</p> <p>24. Submitted that Walking/Cycling is a multi-faceted issue as it covers both urban and rural and merits a separate chapter. At the very least it should be cross-referenced. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p> <p>25. Under Section 6.3, submitted that the additional Text to address included:</p> <ul style="list-style-type: none"> • Cycling and walking(including walking and cycling routes) are healthy modes of transport. • Reference the aims and actions of the DoTT's Smarter Travel. • The NCPF (DoT 2009) aims to create a strong cycling culture which would provide health benefits, a more friendly environment for cycling and improved quality of life. Suggests setting out, in detail, the specific objectives of NCPF including: • Provide designated rural cycleways especially for visitors and 	<p><i>Rosse Court</i> Permission was granted, along with the development of a school, for an additional pedestrian link between Rosse Court and Lynches Lane (SD14A/0269).</p> <p><i>St Anne's GAA Club</i> The Ballycullen-Oldcourt LAP provided for a series of links that would provide for a more direct connection from the Ely Estate to St Anne's GAA club via new paths though the proposed open space and local street networks.</p> <p><i>Tubber Lane</i> A cycle route along Tubber Lane would serve a different catchment and purpose to that proposed along the N4 (which would primarily serve commuters and medium to long distance trips). There is little development along the lane at present and it is lightly trafficked, and thus is suitable for recreational use by both cyclists and walkers. The lane could provide a feeder route to Adamstown in future. Notwithstanding this, it is considered that there would be no need to provide dedicated cycle facilities along the route.</p> <p><i>Templeogue Village</i> Table 6.4 Six Year Cycle Network Programme includes the Primary and Secondary routes 9A and 9B, the latter of which passes directly through Templeogue Village. The design of the route has been the subject of Part 8 planning approval in 2012. Phase 1 from Tallaght Village to the M50 underpass is currently under construction. Phase 2 from the M50 to Templeogue Village is included in Council's work programme for 2016.</p> <p>Recommendation It is recommended that the Draft County Development Plan be amended to include a further action be added to (TM) Policy 3 Walking and Cycling stating that the Council will undertake a series of studies in association with the NTA and TII that seeks to address accessibility and permeability issues in the vicinity of existing and proposed major public transport services.</p>
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<p>recreational users.</p> <ul style="list-style-type: none"> • Ensure that all surfaces used by cyclists are maintained to a high standard and are well lit. • Ensure that all cycling networks are sign posted to an agreed standard • Improve driver education and driving standards so that there is a greater appreciation for the safety of cyclists. • Improve enforcement of traffic laws to enhance cycling safety and respect for cyclists. <p>(DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p> <p>26. Submission requests addition of segments of text in Section 6.3 to address:</p> <ul style="list-style-type: none"> • The Irish Trails Strategy. • the importance of cycling routes from a social and an economic point of view and that they facilitate, access to the countryside. • FI's Strategy for the Development of Irish Cycling Tourism (2007) and the NCPF (DOT 2009). • The promotion of walking and cycling requires pedestrian and cycle facilities that form a coherent network placing a strong emphasis safety and are free from obstruction and are given priority over vehicular traffic. • Greenways are shared-use routes for non-motorised users (walkers, cyclists and horse riders). • The provision of new walking and cycling routes and the improvement of existing routes in the countryside. • It is the aim of the NRA, in conjunction with FI, WI and Coillte, to develop a world class traffic free route from Dublin to Galway. • The potential for development of walking routes and linking with adjoining counties. <p>(DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p> <p>27. Request inclusion of Tables(including Maps) of:</p> <ul style="list-style-type: none"> • Way-marked Ways of medium/long-long distance walking routes, Greenways Sli na Slainte, heritage/historic walking trails, pilgrim paths, paths to mass rocks and holy wells, looped walks, hillwalks 	<p><u>Design of Facilities</u></p> <p>TM3 Objective 3 states:</p> <p>‘To ensure that all streets and street networks are designed to prioritise the movement of pedestrians and cyclists within a safe and comfortable environment for a wide range of ages, abilities and journey types’</p> <p>TM3 Objective 4 states:</p> <p>‘To prioritise the upgrade of footpaths, lighting & public realm maintenance and supporting signage on public roads/paths where a demonstrated need exists for busy routes used by runners & walkers’</p> <p>Several listed Actions of (TM) Policy 3 seek to ensure these objectives are achieved via the following:</p> <ul style="list-style-type: none"> ▪ ‘Provide additional directional signs for major destinations, civic amenities and tourist attractions on major pedestrian and cycle routes, including references to distances, estimated times and/or number of steps to be taken’ ▪ ‘Ensure facilities for pedestrians and cyclists are designed in accordance with the principles, approaches and standards contained within the Design Manual for Urban Roads and Streets and the National Cycle Manual’ ▪ ‘Further develop a footpath repair and assessment system where members of the public can report maintenance issues and instigate repairs, and implement a public lighting renewal, improvement and maintenance strategy’ <p>(TM) Policy 6 Road and Street Design also states that:</p> <p>‘It is the policy of Council to ensure that streets and roads within the County are designed to balance the needs of place and movement, to provide a safe traffic-calmed street environment, particularly in sensitive areas and where vulnerable users are present’</p> <p>This is further detailed within the Objectives listed under this Policy, namely:</p>
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<p>and other defined walking trails and cycle routes with accompanying maps and a data base.</p> <ul style="list-style-type: none"> • Cycle routes, a temporary register of additional routes shall be maintained and should be included in the web site pending inclusion in the next Plan. <p>(DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p> <p>28. Submitted that TM 3 Objective 1 be replaced by:</p> <p>Create, provide, promote, improve, develop, sustain, support, enhance, encourage and facilitate walking, rambling and cycling as appropriate recreational and tourism activities by identifying more dedicated walking and cycling routes to enable the creation of a high quality dedicated comprehensive network of safe cycling/walking routes and tourist trails (including looped walks, local walks, community walks and medium/long distance walks) and the public/rural footpath network, in rural areas (including suitable linear lands along established rights of way, strategic green corridors and other off-road routes) linking communities to key destinations, amenities and leisure activities and exploiting their vast recreational and tourist potential (including international tourists). Map suitable recreational routes and promote and facilitate the development of such routes having cognisance of national policy. Enhance and extend existing routes, by utilising links from residential areas through parks and open spaces to link with existing waymarked trails and facilitate a green infrastructure network and linking with Sli na Slainte and existing or new public rights of way and the Green Infrastructure network to provide access to scenic, mountain, lakeshore and river features and views of special interest, particularly where these have a historical association. The development of various cycling/walking routes have helped to open up diverse landscapes and promote tourism. Off-road walkways can be established by informal, formal agreements with landowners or by acquisition. Support proposals that improve pedestrian routes and that improve and develop walking and cycle networks.</p> <p>(DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p>	<p>‘TM6 Objective 1: To appropriately apply speed limits taking into account the characteristics of the surrounding area, the design of the street environment and the presence of vulnerable users’</p> <p>‘TM6 Objective 2: To ensure that all streets and street networks are designed to passively calm traffic through the creation of a self-regulating street environment’</p> <p>And the following Actions</p> <ul style="list-style-type: none"> ▪ ‘New roads and streets within urban areas shall be designed in accordance with the principles, approaches and standards contained within the DMURS’ ▪ ‘That the design of street networks in new residential estates shall facilitate the implementation of Special Speed Limits, including the lowest speed limits applicable under current legislation’ ▪ ‘Speed limits in urban areas will be set in accordance with the Guidelines for Setting and Managing Speed Limits in Ireland, DTTAS (2015) and the Road Traffic Act 2004 (as amended), including the provision of Special Speed Limits (i.e. 30 km/h and 40 km/h zones) within town and village centres, residential areas and around schools’ <p>These Actions are further detailed in Section 6.4.3(I) – Design of Streets and Roads in Urban Areas and Section 6.4.3(II) – Special Speed Limits. The application of these National Guidelines within the County will ensure that streets are designed to place an emphasis on slow modes of transport, provide for reduced traffic speeds and create a safer environment for vulnerable users.</p> <p>The Polices, Policy Objectives and Actions provide a robust framework for the development of a safe network of pedestrian and cycle facilities.</p> <p>The NTA has also requested that reference be made to the National Cycle Manual (NCM) under (TM) Policy 6 Road and Street Design. The NCM will be of relevance where cycle facilities exist or are proposed.</p>
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29. Submission requests additional Objectives in TM3 to address:
- The key principles, goals, targets, strategies and actions of DoTT's Transport's 'Smarter Travel, Cycle and Walking Strategy'.
 - The development of cycling and walking routes suitable for people of different generations and levels of fitness.
 - The development of regional and local network of trails in conjunction with the Irish Trails Strategy and the Walks Scheme in conjunction with the National Waymarked Ways Committee and other national programmes.
 - The holding of a Walking Festival to attract visitors and celebrate the diverse landscape and heritage of the county.
 - The employment of a full time Walks Officer at an appropriate senior level.
 - The construction of cycleways and integrate these cycleways with the DTO cycling policy for the GDA (September 2006) as may be amended.
 - The development and expansion of safe cycling facilities and cycle routes (including adjoining counties).
 - The continued development of cycle routes by identifying routes and by laying particular emphasis on those that link existing cycle routes and tourist destinations.
 - FI's Strategy for the Development of Irish Cycle Tourism and liaise with the Sports Council.
 - The employment, at appropriate senior level, of a 'Cycling Officer'.
 - Secure improvements to the Cycle Network by supporting the NTA on the development and implementation of the Cycle Network Plan for the GDA.
 - Support the implementation of the Strategy for the Development of Irish Cycle Tourism - East Coast Midlands.
 - Support the continuing development of the Dodder Greenway (Grand Canal to Bohernabreena).
 - Investigate the possibility of developing cycle/greenways utilising existing abandoned road infrastructure for cycle/greenways.
 - Implement the recommendations and proposals within the 'NCN Scoping Study (2010)'.

Recommendation

It is recommended that the Actions listed under (TM) Policy 6 Road and Street Design of the Draft County Development Plan be amended to make reference to the National Cycle Manual.

Health Benefits of Walking and Cycling

The contribution that walking and cycling makes to a healthier lifestyle is acknowledged in Section 6.3.0 – Walking and Cycling where it is stated that: 'There are opportunities to make walking and cycling more attractive, to increase the proportion of daily journeys undertaken on foot or by bicycle and promote healthier lifestyles'

The Council's commitment to increasing walking and Cycling are further detailed (TM) Policy 3 Walking and Cycling and the Policy Objectives and Actions listed thereunder. These generally accord with the Actions listed in Healthy Ireland, which also seek to create 'active friendly' environments and to 'engage with local communities, schools and other stakeholders to plan facilities that are appropriate to the needs of the community'.

Recommendation

It is recommended that Section 6.3.0 of the Draft County Development Plan be amended to make reference to Healthy Ireland.

Walking in Rural Areas

Section 6.3.0 is predominantly concerned with walking and cycling in urban areas, as this is where, by far, the greatest levels of pedestrian and cyclist activity within the County take place (at present and into the future). Notwithstanding this, the development of a number of Greenways will directly benefit rural/urban fringe urban communities, in particular the Liffey Valley (Strawberry Beds area), Dodder (Bohernabreena area) and Grand Canal Greenways (Hazelhatch area). One of the actions listed under (TM) Policy 3 Walking and Cycling states that Council will:

'Adopt a County-wide signage scheme for motorists, in accordance with the Traffic Signs Manual, warning of the presence of

<ul style="list-style-type: none"> • Support, improve and expand and upgrade Slí na Sláinte routes in consultation with community groups, local/regional tourism interests and the DoTT and the HSE. • Maintaining and enhancing existing facilities securing the development of a network of safe cycle routes and footpaths on existing roads, proposed roads and on new road improvement schemes and on routes reserved exclusively for pedestrians and cyclists and linear parks. • Signpost and waymark Walking and Cycle Routes with appropriately designed quality signage so as to facilitate visitors. • The development of existing historic and other themed trails(including pilgrim paths and Sli Mor), suitable walking routes, cycle tracks and bridle paths and protect them from inappropriate development. • Co-operation with local community groups Regional Tourism Authority. • An overall Walking and Cycling Policy/Strategy within two years of the adoption of the Plan. • Provide car parking and/or lay-by for cyclists, hillwalkers and mountain climbers at (from your local knowledge name important locations) and other appropriate points to access amenities and scenic areas. Add: from 9am until dark. • The provision bicycle renting, guided walks and walking/cycling tours in partnership with state, private and voluntary sectors. • A register of approved national trails and other walking and cycling routes and promote their greater use. • A cycleway and walkway from Dublin to Galway including related signage, waymarking and associated works and connections. • Implementation of the GDA Cycle Network Plan (2013). • The impact of proposed development when considering applications for permission for developments in their vicinity in order to protect the integrity of these important recreational and tourism resources. <p>(DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p>	<p>pedestrians and cyclists along rural roads’</p> <p>Several Policy Objectives contained in the Chapter 9 – Heritage, Conservation and Landscape make reference to walking and cycling in rural areas, namely:</p> <p>HCL 16 Objective 3: To promote and facilitate the continued development of the Dublin Mountains Way and the Wicklow Way in association with the Dublin Mountains Partnership, particularly Permissive Access Routes that provide access to regional and local networks of walking, running, hiking and mountain bike trails and other recreational facilities. The routing of new trails and rerouting of existing trails off public roads is encouraged.</p> <p>HCL 16 Objective 5: To bring mountain amenities closer to residential communities by promoting the establishment of a network of formal footpaths, off-road paths and cycleways that facilitate casual walkers and cyclists.</p> <p>A cross reference to these Policy Objectives can be inserted as an additional Action under (TM) Policy 3 Walking and Cycling.</p> <p>The development of a number of Greenways will also directly benefit rural/urban fringe urban communities, in particular the Liffey Valley (Strawberry Beds area), Dodder (Bohernabreena area) and Grand Canal Greenways (Hazelhatch area).</p> <p>Recommendation</p> <p>It is recommended that the Draft County Development Plan be amended to cross-reference (TM) Policy 3 Walking and Cycling with (HCL) Policy 16 Public Rights of Way and Permissive Access Routes.</p> <p><u>Cycling and Walking Officers</u></p> <p>The appointment of Cycling and/or Walking Officers is an executive function and is not a matter for the County Development Plan.</p>
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	<p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Bicycle Parking</u> Section 11.4.1 of the Draft Plan 2016-2022 sets out Minimum Bicycle Parking rates for all new development in the County. It is also noted within the section that: ‘The Council will also seek to provide additional opportunities for the provision of bicycle parking facilities along public transport routes and within town and village centres, parks and other areas of civic importance’ Any request for site specific facilities is a non-strategic issue and is not a matter for the County Development Plan.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Enforcement</u> Issues regarding the enforcement of roads legislation falls within the remit of An Garda Síochána, and is not a matter for the County Development Plan.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Mapping</u> The level of information illustrated on the Draft Plan 2016-2022 Maps (and within the Draft Plan more generally) is comprehensive. A balance needs to be found in regard to the illustration of detailed Ordinance Survey information and strategic direction to ensure that the maps are legible. Furthermore detailed maps regarding walking and cycling routes (and other</p>
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	<p>information) are already available from multiple sources, such as the Ordnance Survey Discovery Series. Detailed maps of the existing and proposed cycle lanes through metropolitan and rural Dublin (and adjoining counties) are contained within the Greater Dublin Area Cycle Network Plan.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>References to Other Plans</u> As noted in Section 6.0 – Introduction of the Draft Plan 2016-2022, the transport and mobility policy in South Dublin is guided by a ‘comprehensive and coordinated set of national and regional policy documents’. An exhaustive list of all relevant national and regional plans is not provided.</p> <p>A more focused approach has been taken that links the implementation of a Policy or Policy Objective with more detailed guidelines which are to be used as implementation tools or provide standards for assessment. Such references are provided where they are directly linked to the implementation of a Policy or set of Policy Objectives as an Action. For example:</p> <p>Section 6.3.0 - Walking and Cycling make reference to the Greater Dublin Area Strategic Cycle Network and links its implementation to the objectives of the plan. TM3 Objective 1 states:</p> <p style="padding-left: 40px;">‘To create a comprehensive and legible County-wide network of cycling and walking routes that link communities to key destinations, amenities and leisure activities’</p> <p>There are several overarching national policy documents such as Smarter Travel, the National Cycle Policy Framework and the Urban Design Manual which have informed this objective. In terms of its implementation, the Actions listed under this policy make reference to documents with more detailed guidelines, including:</p> <ul style="list-style-type: none"> ▪ ‘Work with the NTA to assist and secure funding for the ongoing implementation of the County Strategic Cycle Network (see also
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	<p>Section 6.3.1 - County Strategic Cycle Network)</p> <ul style="list-style-type: none"> ▪ ‘Reduce walking and cycling distances to areas of employment, community services, schools, shops, public transport and other community facilities through the delivery of Local Permeability Improvements within existing communities (see also Section 6.3.2 – Local Permeability Improvements)’. <p>This ensures that the integrity of the Policies and Policy Objectives within the Draft Plan are maintained, should any of these more detailed plans be withdrawn or superseded.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Minor Works</u> Requests for new/improved footpaths, crossings and other localised pedestrian facilities, referenced in submissions received, are a non-strategic issue and are, therefore, not a matter for the County Development Plan.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
6.4.0 Road and Street Network	
<p>1. Submission notes negative impact of N81 (R148) on Palmerstown community and need for unimpeded access between areas to north and south of same. Kennelsfort Road junction upgrade proposal is deemed inadequate to address said concerns. Submission also notes issues regarding observation of speed limit on subject roadway. (DRAFTDEVPLAN0244, Sean Treanor)</p> <p>2. Consider addressing issue of traffic congestion in Lucan Village</p>	<p>Chief Executive’s Response and Recommendations The Chief Executive has carefully considered the issues raised in relation to Road and Street Network and provides responses and recommendations under the following subheadings:</p> <ul style="list-style-type: none"> ▪ Strategic Road Network; <ul style="list-style-type: none"> ○ Access to N4, N7 and M50 ○ M50 ○ Kennelsfort/N4 junction ○ Link Road Between Aerodrome/Greenogue Business Park

<p>particularly peak time traffic that exits M50 before travelling through village to avoid M50 toll. (DRAFTDEVPLAN0058, Edward Finn)</p> <p>3. The new TEN-T regulations have implications for the N7 and require an upgrade in standard between the M50 and Naas by 2030. The N7 and N4 provide access to international markets for freight. A finalised N4 and N7 Corridor Study will recommend a suite of transport measures that will protect the strategic function of the National Road network and this will have repercussions for the proposed Local Access Study for Liffey Valley. It is recommended that the Development Plan should refer explicitly to the Ten-T regulations and N4 and N7 corridor study. (DRAFTDEVPLAN0060, Tara Spain, Transport Infrastructure Ireland (TII) DRAFTDEVPLAN0506, Tara Spain, Bonneagar Iompair Éireann)</p> <p>4. The M50 was originally envisaged as a bypass route for strategic traffic and it is forecasted that, in the absence of demand management, nearly 40% of sections of the M50 will experience traffic flows that exceed capacity by 2023. A steering group has been convened to undertake a study to identify a scheme of indicative Demand Management Measures for the M50. It is requested that the Development Plan refers specifically to the Demand Management Report. (DRAFTDEVPLAN0060, Tara Spain, Transport Infrastructure Ireland (TII) DRAFTDEVPLAN0506, Tara Spain, Bonneagar Iompair Éireann)</p> <p>5. It is not likely that TII will be responsible for financing projects relating to national roads included in Table 6.5 given that they are not considered to be a priority. TII does not support projects that will compromise the requirements of the TEN-T network namely the following road proposals: - Tandys Lane/N4 - Tay Lane/N7 Junction - Esker Lane/N4 - Junction 8 - M50 - Citywest Junction Improvement - Fonthill Road/N4</p>	<p>and Baldonnell Business Park</p> <ul style="list-style-type: none"> ○ Outer Orbital ▪ Traffic Congestion ▪ Speed ▪ Local Street Networks ▪ Minor Works <p><u>Strategic Road Network.</u> The management of the strategic road network throughout the County is divided between TII and SDCC, with the former being responsible for the national routes that pass through the County (M50, N4, N7 and N81). The NTA also has a statutory responsibility for the management of traffic within the Greater Dublin Area.</p> <p>There are several European, national and regional policy documents that will guide the development of (and development along) the strategic road network, such as the Trans-European Transport Networks (TEN-T) Regulations, Draft Transport Strategy 2016-2035 for the Greater Dublin Area and the Spatial Planning and National Roads: Guidelines for Planning Authorities 2012. The Draft Plan 2016-2022 must take cognisance of these documents, and references are made to these documents where relevant. It should be noted that specific details contained within these documents are not repeated in the Draft Plan to avoid repetition.</p> <p>It should also be noted that any new road proposal will be subject to environmental appraisals (such as an Environmental Impact Statement). This process will require a range of alternatives to be considered and mitigation measure to be implemented, where relevant.</p> <p>The following sections respond to issues raised in regard to particular routes/locations on the strategic road network. It should be noted that the final alignment, and design of all new roads (six year and medium to longer term) will be determined at a later stage (including the undertaking of public consultation) in accordance with the relevant Act.</p>
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<p>(DRAFTDEVPLAN0060, Tara Spain, Transport Infrastructure Ireland (TII) DRAFTDEVPLAN0506, Tara Spain, Bonneagar lompair Éireann)</p> <p>6. The DoECLG Spatial Planning and National Roads Guidelines restriction on access to national roads applies to all categories of development where there are speed limits greater than 60pkm including individual houses in rural areas. A clear statement in relation to this restriction should be inserted into the Development Plan. (DRAFTDEVPLAN0060, Tara Spain, Transport Infrastructure Ireland (TII) DRAFTDEVPLAN0506, Tara Spain, Bonneagar lompair Éireann)</p> <p>7. Request to address traffic congestion on Griffeen Avenue at peak morning travel times during school terms. (DRAFTDEVPLAN0062, Patricia Houston)</p> <p>8. Submission outlines that bad planning has had a negative effect on Palmerstown and surrounding areas and requests and suggests the following: -Junction over the R148 from Kennelsfort Road Upper into Kennelsfort Road Lower needs to have a pedestrian walkway as the current bridge is unsuitable mainly because of the aging population here. -Junction of Kennelsfort Road Upper and Coldcut Road be closed except for Gardai, Ambulances, Firebrigades, emergency services and Buses. -Closing the entrance / egress from Kennelsfort Road Upper into Cherry Orchard Industrial Estate. -Moving the bollards on Palmerstown Avenue to the end at the Oval .Traffic could flow down the Avenue into the oval and up same way. -Access onto R148 from the Oval and The Avenue at this point should be closed and would offer more protection for the schoolchildren there. -The major development at the old Vincent Byrne site at junction of</p>	<p><i>Access to N4, N7 and M50</i> TII are currently preparing the 'N4 and N7 Corridor Study' to set out a strategy to the year 2030 to manage the strategic function of the national roads, whilst supporting population and employment growth in the area served by them. Further detail in relation to demand management (including access) will be included therein. This Study should be further referenced in the Draft Plan 2016-2022 under (TM) Policy 5 Traffic and Transport Management.</p> <p>The Trans-European Transport Networks (TEN-T) Regulations have major implication for future access to the N4 and N7. The Regulations require the upgrade of the N7 to motorway or 'express road' standards between the M50 and Naas by 2030. The N4 is also considered part of the TEN-T comprehensive network.</p> <p>TII have advised that the inclusion of a number of junction proposals contained within Table 6.5 Six Year Road Programme and Table 6.6 Medium to Long Term Road Objectives will compromise the requirements of TEN-T, including:</p> <ul style="list-style-type: none"> ▪ Esker Lane/N4 - Junction re-opening and upgrade. ▪ Junction 8 (M50) ▪ Tandy's Lane/N4 - Junction re-opening and upgrade. ▪ Tay Lane/N7 Junction - Junction re-opening and upgrade. <p>The NTA and DTTAS have also raised issue with the Esker Lane/N4, Junction 8 (M50) Tandy's Lane/N4 and Tay Lane/N7 junctions.</p> <p>The consent of the TII would be required to provide access junctions to the N4 and N7; in addition, the support of the NTA and DTTAS would also be crucial, particularly if funding from a national agency was sought. In the absence of support from the TII, NTA and DTTAS for such junctions, which all three agencies have raised objections to, the progression such works is improbable. The inclusion of such proposals in the Draft Plan may, therefore, unduly raise community expectations in relation to same.</p> <p>TII have also raised objection to the inclusion of:</p>
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<p>R148 and Kennelsfort Road Lower has an Entry / Egress that is dangerous at one of the busiest junctions in the country. (DRAFTDEVPLAN0145, Joe Harrington)</p> <p>9. Request for designated transport plan to provide vital public transport links in the communities in Balgaddy, connecting people to shops, services, schools etc. (DRAFTDEVPLAN0274, Lorraine Hennessy, Balgaddy Working Together Group)</p> <p>10. Submission on behalf of Lansdowne Park and District Residents' Association welcomes the inclusion of the Templeroan Road Extension in the 6 year road programme by reason of the inadequacy of the Knocklyon Road to deal with traffic volumes from new development; issues of public safety; the need for cycle tracks and 'recessed' footpaths on the new section of road; difficulty of residents on Knocklyon Road to enter and exit driveways; and the excessive noise and vibration from existing ramps on the Knocklyon Road. (DRAFTDEVPLAN0164, Marion Sweetman, Lansdowne Park & District Residents' Association)</p> <p>11. Submission from Knocklyon Network supports designation of District Centre in Knocklyon but raises concerns in relation to access and traffic congestion. It is requested that an SLO be inserted into the Development Plan that requires any commercial or residential development off Idrone Avenue to require the submission of a Traffic Management Plan and subject to conditions that may require the provision of a second entrance/exit onto Knocklyon Road. (DRAFTDEVPLAN0180, Eugene Barrett, Knocklyon Network Ltd.)</p> <p>12. It is advised that failure to address the current traffic problems in Lucan will act as a disincentive to residential development at Adamstown and undermine planning for further housing at Clonburris. It is proposed that revised traffic management systems</p>	<ul style="list-style-type: none"> ▪ Fonthill Road/N4 Junction upgrade. ▪ Citywest Junction Improvement - Re-alignment of eastbound slip lane onto the N7. <p>It is noted, however, that these junction proposals do not propose to alter access arrangements, other than to improve safety and/or efficiency.</p> <p>Any further requests to access the N7 or to make modifications to junctions and road layouts should be directed to TII for consideration, such as via the 'N4 and N7 Corridor Study'. Should such a proposal be agreed, only then should it be included within the Draft Plan.</p> <p>Concerns have also been raised by the NTA in regard to the proposed Oak Road Extension which would intersect with the N7. The NTA has not requested its removal, however, it is noted that any scheme would have to demonstrate that it would not affect the capacity of the road or adversely impact the movement of buses and trams along the route. It is not recommended that any changes be made to the Draft Plan in this regard.</p> <p><i>M50</i></p> <p>The Management of the M50 is the remit of the TII. The Draft Transport Strategy for the Greater Dublin Area 2016-2035 notes that:</p> <p style="padding-left: 40px;">'traffic levels on the M50 have continued to grow, even during the economic downturn, and delays on this corridor are now a common feature, despite a near-doubling of its capacity in recent years'.</p> <p>The Transport Strategy also states that:</p> <p style="padding-left: 40px;">'other than on the southern section of the route, further capacity enhancements to the M50 are neither physically possible nor environmentally desirable'</p> <p>To address capacity issues on the M50, the Transport Strategy include a number of initiatives, including:</p> <ul style="list-style-type: none"> ▪ The creation of a Core Orbital Bus Network to increase the attractiveness of public transport alternatives. ▪ A suite of demand management measures (such as multi-point
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<p>and road layouts should be installed/carried out at Newcastle Road, Griffeen Avenue and Moy Glas estate. (DRAFTDEVPLAN0194, Frances Fitzgerald, Minister for Justice and Equality)</p> <p>13. NTA has concerns in relation to the following road proposals by reason of negative impacts on public transport, adverse impacts on operational capacity of national roads and contravention of national policy to protect investment in the national road network: - Esker Lane/N4 junction reopening - Junction 8 M50 - Oak Road Extension - Tandy's Lane/N4 junction reopening - Tay Lane / N7 junction reopening - Kennelsfort Road/R148 upgrade separation. (DRAFTDEVPLAN0209, Tadhg MacNamara, National Transport Authority)</p> <p>14. Utilise Myles Wright concept of peripheral service roads and centralised pedestrian areas. (DRAFTDEVPLAN0212, Doireann Ni Cheallaigh, An TaisceDRAFTDEVPLAN0496, Patrick Leonard, An Taisce)</p> <p>15. Concerns in relation to insufficient consideration given to traffic congestion around Lucan Village and the use of the Liffey Bridge by motorists wishing to avoid the M50 toll. Consider installation of a roundabout at bridge. The proposal to investigate a tunnel under the Liffey should be subject to strict environmental criteria. (DRAFTDEVPLAN0225, Joanna Tuffy, TD - Constituency of Dublin Mid-West)</p> <p>16. Submission requests that the relief road at Rathcoole be considered a six year road objective, as opposed to a Medium to Long Term Road Objective to accommodate the residential expansion and population increase in the area. (DRAFTDEVPLAN0162, Suzanne McClure, Brock McClure)</p>	<p>tolling and ramp metering) to ensure it fulfils its primary function as part of the strategic road network.</p> <ul style="list-style-type: none"> ▪ Addressing congestion issues on the radial national routes approaching the M50 motorway, to ensure that these routes retain sufficient capacity to fulfil their strategic functions; ▪ An orbital road outside of the M50 linking the N7, N4 and N3 <p>Further details in regard to demand management (and management of the M50 more generally) are also detailed in the NRA published M50 Demand Management Report 2014, which should be further referenced in the Draft Plan 2016-2022 under (TM) Policy 5 Traffic and Transport Management.</p> <p>As noted above, TII have also advised that the proposed Junction 8 contained within Table 6.6 Medium to Long Term Road Objectives will compromise the requirements of TEN-T. This junction was formally linked to the M7 project which has since been abandoned. SDCC will work in close association with the relevant agencies in regard to ensure that sufficient alternative measures are put in place to reduce demand on the M50 and that the implementation of demand management measure to ensure to minimise any potential impacts on the County's road network.</p> <p><i>Kennelsfort/N4 junction</i> Table 6.5 Six Year Road Programme, contains an objective to upgrade the Kennelsfort Road/R148 as to make provision for a: 'grade separated junction to enhance the efficiency of the junction, particularly for buses on the N4/Lucan Road QBC and ensure safe crossing facilities are provided for all users'</p> <p>Concerns have been raised by the NTA in regard to the proposed junction stating that it may that the proposed upgrade would not be in accordance with established policy. Section 5.8.3 - Principles of Road Development of the Draft Transport Strategy for the Greater Dublin Region states that: 'That there will be no significant increase in road capacity for private vehicles on radial roads inside the M50 motorway'</p>
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<p>Consultants, Ecotec Construction Ltd)</p> <p>17. Request clarification that the proposed road works 'bypassing' a section of the Greenhills Road would maintain full access to the bypassed road. (DRAFTDEVPLAN0190, Fintan Morrin , The Planning Partnership, Lidl Ireland GmbH)</p> <p>18. Request that the turning right movement of cars from Ballycullen Road into Glenlyon estate be reviewed as there is very little room for a car to pass on the outside due to the length of the cycle track. (DRAFTDEVPLAN0263, Graham Owens, Glenlyon Residents Association)</p> <p>19. Submission requests feasibility of providing an interchange on the N7 at Keatings Park be examined. Submission also requests examination of the feasibility of providing a link road between Aerodrome Business Park and Baldonnell Business Park to provide an alternative route for traffic and reduce traffic levels at Rathcoole inter-change bridge. (DRAFTDEVPLAN0170, Neville Graver, Rathcoole Community Council Limited)</p> <p>20. Long terms road proposals that would go through agricultural lands to the west of the County and disturb such lands through loss of connectivity of ecological corridors, loss of habitat and facilitation of future development. Roads and public transport proposals may also impact on the Grand Canal at Gollierstown and the Liffey Valley pNHA at two locations. (DRAFTDEVPLAN0510, Simon Dolan, Department of Arts, Heritage and the Gaeltacht)</p> <p>21. Request that the following be included in the Development Plan 2016-2022: (1) Specific Objective requiring the Council to undertake and complete, within twelve months of the adoption of</p>	<p>This has been a long standing approach from the NTA, as further noted in Section of the 3.2.6 Road Network of the Draft Transport Strategy: ‘Since the mid-1990s, transport policy in the GDA has been directed towards reducing the growth in car travel and increasing the use of public transport, cycling and walking. Complementing this approach has been a policy of not increasing road capacity for private cars on radial roads inside the M50. The basis for these policies is recognition that it is unrealistic and unsustainable to accommodate growth in travel demand across the region through car based movement’</p> <p>Notwithstanding the above Section 5.8.2 Regional and Local Roads of the Draft Transport Strategy states: ‘Address localised traffic delay locations, including on radial routes inside the M50 C-Ring, in cases where the primary reason for intervention is to address safety or public transport issues at such locations’</p> <p>The provision of a segregated junction, or flyover, at this location would be a substantial financial commitment, and the support of the NTA would be crucial in this regard. As such, a strong case for such funding would need to be made, supported by a feasibility study and strong cost/benefit analysis that shows a substantial improvement in the level of service afforded to sustainable users, whilst not increasing the capacity of the street network for private cars. It is not recommended that any changes be made to the Draft Plan in this regard.</p> <p><i>Link Road Between Aerodrome/Greenogue Business Park and Baldonnell Business Park</i> The provision of a link road between these two business parks has not been identified in either Table 6.5 Six Year Road Programme or Table 6.6 Medium to Long Term Road Objectives. It not clear how this road would reduce pressure on the current Rathcoole Interchange, other than facilitate direct access for a limited number of movements between the two estates. The provision of a new junction as part of the Western Orbital Route, identified within Table 6.6 is a more effective way to reduce congestion at</p>
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<p>the County Development Plan, a comprehensive survey in respect of the traffic problems in the Stocking Lane/Ballyboden area and to develop a viable solution to the traffic problems in the area. (2) Six Year Road Programme Objective to carry out the improvement works necessary for the implementation of an effective solution to the traffic problems in the Stocking Lane/Ballyboden area. The residents of Prospect Manor request that South Dublin County Council give serious consideration to the traffic situation in the area and include these objectives in the County Development Plan. (DRAFTDEVPLAN0267, Patrick Joyce, Prospect Manor Residents Association)</p> <p>22. Request to remove 6 Year Road Proposal identified on lands located north of Fortunestown Lane, east of Garter Lane and south of Bianconi Avenue and Orchard Avenue, Orchardstown (c.27.5 Ha in area and subject to proposed zoning objective RES-N), on the basis that:</p> <ul style="list-style-type: none"> - there is currently an access road to the site, located at the south eastern corner of the site, linking to Fortunestown Lane via an existing roundabout and including a signalised Luas crossing point; as such, the proposed road is not required, - it is also questionable as to whether an additional Luas crossing at this location would be supported by TII, and - the location and layout of the road network to serve the subject lands should be determined by the detailed design of the site layout, with a development proposal for residential accommodation on the subject site to be submitted to the planning authority by the landowner in 2016. <p>(DRAFTDEVPLAN0126, John Murphy, BMA Planning, Airscape Limited)</p> <p>23. Submission notes need for:</p> <ul style="list-style-type: none"> - improved transport links both into the city and also around the County, especially third level institutions and to other areas of Dublin. 	<p>the Rathcoole Interchange</p> <p><i>Outer Orbital</i></p> <p>The Draft Plan 2016-2022 includes a Medium to Long Term (Table 6.6) road proposal for a Western Orbital Route. The northern section of the route is proposed to connect the N7 to the N4 (with a provision to make a further connection to the N3). The southern section is proposed to connect the N7 to the N81. The northern Section has been included within the Draft Transport Strategy for the Greater Dublin Area 2016-2035.</p> <p>Part of the southern section of the proposed Western Orbital will subsume and supersede two road proposals to the south of Rathcoole contained within the current Plan 2010-2016, namely:</p> <ul style="list-style-type: none"> ▪ Southern Relief Road for Rathcoole - from Stony Lane to sports grounds contained within the Six Year Roads Objectives ▪ From the N7 at Keatingspark to Rathcoole Southern Relief Road at Stony Lane contained within the Long Term Roads Objectives <p>The route depicted in the Draft Plan 2010-2016 is proposed to be subsumed into the Western Dublin Orbital Route (south) from Boherboy to Tootenhill as a link between the N81 and the N4 (with a by-pass function around Rathcoole and Saggart (refer to Table 6.6 Medium to Long Term Road Objectives). This will provide for a more complete link that facilitates the removal of through traffic from Saggart and Rathcoole. As per the longer term objectives in the current Plan 2010-2016, it will also provide an alternative means of accessing the N7 from Rathcoole. Given the longer term strategic function of this route, it is appropriate that all sections of the route remain in Table 6.6 of the Draft Plan 2016-2022.</p> <p>Recommendation</p> <p>It is recommended that Table 6.5 Six Year Road Programme and Table 6.6: Medium to Long Term Road Objectives of the Draft County Development Plan be amended to remove the proposals for the following junctions:</p> <ul style="list-style-type: none"> ▪ Fonthill Road/N4 ▪ Esker Lane/N4 ▪ Tandy's Lane/N4
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<ul style="list-style-type: none"> - improved transport links in the Ballyboden area, including public transport provision, - improvement to traffic infrastructure provided in tandem with new/permitted residential development, - expansion of TI reports with planning application submissions to include cumulative impacts, - upgrading of the junction of Taylors Lane, Edmonstown Road and Ballyboden Road due to current traffic congestion issues. <p>(DRAFTDEVPLAN0245, Mark Byrne, Prospect Manor Residents Association)</p> <p>24. Submission received from the Department of Environment, Community and Local Government.</p> <p>Submission notes that Table 6.5 of the Plan lists the proposed road construction/works programme over the 6 year period of the Plan including proposals to provide access to the N4 (Esker Lane, Tandys Lane), N7 (Tay Lane) and M50 (Junction 8). The submission notes that the N4, N7 and M50 are designated national primary routes and proposals for design changes and/or access arrangements are a matter for the National Roads Authority (NRA), and that Section 2.6 of the Spatial Planning and National Roads Guidelines (2012) provides for the creation of new accesses onto national roads only in the context of a development plan preparation process subject to the specified approach detailing 'exceptional circumstances' in sections 2.6(1) & (2).</p> <p>Submission states that the Plan has not, as required by section 2.6 of the Spatial Planning and National Roads Guidelines, detailed the rationale for new access arrangements at the proposed locations in accordance with the requirements of the Guidelines, and the relevant access objectives have the potential to generate traffic impacting adversely on the operation of this National Road Infrastructure. Accordingly, the submission requires SDCC to remove the proposals regarding new accesses to National primary routes from Table 6.6 (pg.111) and any supporting text in the Draft Plan as it is not consistent with section 2.2 of the Spatial Planning and National Roads Guidelines and would be premature pending</p>	<ul style="list-style-type: none"> ▪ Tay Lane/N7 Junction ▪ Junction 8 (M50) <p>and that the Actions of (TM) Policy 5 Traffic and Transport Management be amended to make reference to the requirements of the Trans-European Transport Networks (TEN-T) Regulations and the recommendations of other policy documents such as the NRA M50 Demand Management Report 2014, DECLG Spatial Planning and National Roads: Guidelines for Planning Authorities 2012, and the N4 and N7 Corridor Study.</p> <p><u>Traffic Congestion</u></p> <p>The Draft Plan 2016-2022 includes a multi-faceted approach to addressing the issue of traffic congestion by way of:</p> <ul style="list-style-type: none"> ▪ Making provision of high quality public transport services throughout the County, and in particular orbital routes which link the County's major towns, areas of employment and growth areas (Section 6.2.0 Public Transport). ▪ The creation of a comprehensive and legible County-wide network of cycling network that integrates with the Greater Dublin Area Cycling Network Plan (Section 6.3.0 – Walking and Cycling). ▪ The creation of new pedestrian and cycle links within existing communities that decreases walking distances to public transport services, shops, schools and other local amenities (Section 6.3.0 – Walking and Cycling). ▪ Ensure that all streets and street networks are designed to prioritise movements by sustainable modes, including the moderation of speeds (including reductions in speed limits) in sensitive areas and where vulnerable users are present (Section 6.4.3 Road and Street Design). ▪ The implementation of educational programmes, travel plans and other demand management measures which encourage sustainable travel modes and reduce car borne traffic within a development. ▪ The implementation of maximum standards for car parking based on proximity to public transport services and other external factors that reduce the need to travel by car (see Section 6.4.4 Car Parking)
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<p>consultation and agreement with the National Roads Authority, and would thus send conflicting signals to the wider community and developers. (DRAFTDEVPLAN0183, Minister for Environment, Community & Local Government, Department of the Environment, Community & Local Government)</p> <p>25. Submission relates to A 4.9 Ha site to the south of the N7, forming part of a c.5.71 Ha overall landholding at Newlands Cross, facing the Naas Road N7 and to the west of the main M50 Interchange, known as the 'Gateway Site' (former SDS lands), currently accommodating an industrial/logistics facility with ancillary detached warehouse buildings. Submission requests inclusion of an SLO on the subject lands to facilitate improved access, as follows (or similar): 'It is an objective to facilitate and encourage upgrades and improvements to vehicular accessibility to lands to the south-west of the M50/N7 junction, including the following: - The provision of a new access road, travelling parallel to the N7 between the Red Cow Park and Ride and the existing access road to the west of the Gateway site (former SDS site). - Upgrade of the junction between the N7 and the access road to the Gateway site (former SDS site). - Improved access to the Luas Red Cow stop and Park and Ride' on the basis that the subject lands occupy a strategic location on the Naas Road corridor, and that the development of the subject site could act as a catalyst for appropriate mixed use development at this location, in accordance with the vision set out in the Naas Road Development Framework Study. (DRAFTDEVPLAN0201, Robert Keran, John Spain Associates, Hibernia REIT Plc DRAFTDEVPLAN0345, John Spain Associates, John Spain Associates, Hibernia REIT Plc)</p> <p>26. Submission relates to A 4.9 Ha site to the south of the N7, forming part of a c.5.71 Ha overall landholding at Newlands Cross, facing the Naas Road N7 and to the west of the main M50 Interchange,</p>	<p>It is also acknowledged in the Draft Plan that new roads will be required to service areas of economic activity and provide access to new growth areas, as noted above in relation to the Strategic Road Network.</p> <p>The Draft Plan 2016-2022 also makes provision for a limited number of local projects that will improve the efficiency of the road network. These number of these projects is limited, as noted within the Draft Plan: 'the creation of more road space to cater for traffic, particularly in existing areas, is expensive and may serve to attract more cars to the network'.</p> <p>This approach is consistent with the Draft Transport Strategy, which acknowledges the need for local road schemes provided they do not undermine the creation of a sustainable transport network.</p> <p>This is the most sustainable and practical approach to addressing traffic congestion within the existing areas of the County.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Speed</u> Section 6.4.3 of the Draft Plan 2016-2022 directly address the issue of speed within the County's road and street network. (TM) Policy 6 Road and Street Design states: 'It is the policy of Council to ensure that streets and roads within the County are designed to balance the needs of place and movement, to provide a safe traffic-calmed street environment, particularly in sensitive areas and where vulnerable users are present'</p> <p>This is further detailed by the following Policy Objectives: 'TM6 Objective 1: To appropriately apply speed limits taking into account the characteristics of the surrounding area, the design of the street environment and the presence of vulnerable users'</p>
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<p>known as the 'Gateway Site' (former SDS lands), currently accommodating an industrial/logistics facility with ancillary detached warehouse buildings.</p> <p>Submission requests inclusion of an upgrade of the existing Monastery Road / L1019 roundabout in the six year roads objectives identified in the Draft Plan in order to ensure that this junction has the capacity to accommodate appropriate future development in the Newlands Cross area.</p> <p>(DRAFTDEVPLAN0201, Robert Keran, John Spain Associates, Hibernia REIT Plc DRAFTDEVPLAN0345, John Spain Associates, John Spain Associates, Hibernia REIT Plc)</p>	<p>'TM6 Objective 1: To appropriately apply speed limits taking into account the characteristics of the surrounding area, the design of the street environment and the presence of vulnerable users'</p> <p>And will be implemented via the following Actions:</p> <ul style="list-style-type: none"> ▪ 'New roads and streets within urban areas shall be designed in accordance with the principles, approaches and standards contained within the DMURS' ▪ 'That the design of street networks in new residential estates shall facilitate the implementation of Special Speed Limits, including the lowest speed limits applicable under current legislation' ▪ 'Speed limits in urban areas will be set in accordance with the Guidelines for Setting and Managing Speed Limits in Ireland, DTTAS (2015) and the Road Traffic Act 2004 (as amended), including the provision of Special Speed Limits (i.e. 30 km/h and 40 km/h zones) within town and village centres, residential areas and around schools' <p>This is also further detailed in Section 6.4.3 (I) Design of Urban Roads and Streets and Section 6.4.3 (II) Special Speed Limits.</p> <p>It is acknowledged within the Draft Plan that the speed at which people drive is primarily influenced by the design of the street or road, with regulatory features (such as speed limits) having a secondary role. Whilst the Council can implement various physical measures aimed at reducing speed as part of its works programme, the enforcement of speed limits is the remit of An Garda Síochána.</p> <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Local Street Networks</u></p> <p>The design of local streets networks will be determined by more detailed planning and transportation office documents such as Local Areas Plans</p>
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	<p>and Integrated Transport Studies. This process will determine movement patterns for all users, and will be the subject of more detailed investigation. The principle aim of all plans will be to prioritise movement for sustainable users. This may result in restrictions on the movement of private vehicles. Such restrictions will be applied in accordance with DMURS as per the following listed Action under (TM) Policy 6 Road and Street Design, namely:</p> <p style="padding-left: 40px;">‘New roads and streets within urban areas shall be designed in accordance with the principles, approaches and standards contained within the DMURS (see Section 6.4.3(I) – Design of Streets and Roads in Urban Areas)’</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Minor Works</u> Requests for road closures, minor junction reconfigurations and other localised works, referenced in submissions received, are a non-strategic issue and are, therefore, not a matter for the County Development Plan.</p> <p>Any requests regarding specific works to enable the future development of a site should be detailed when planning permission is sought.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
Firhouse - N81 Bridge and Oldcourt - Oldbawn Bridge	
<p>Firhouse - N81 Bridge</p> <ol style="list-style-type: none"> 1. In favour of bridge on basis of alleviating traffic congestion. (DRAFTDEVPLAN0004, Conor Sweeney) 2. Objection to bridge proposal. (DRAFTDEVPLAN0007, Aishling Tobin) 	<p>Chief Executives Response and Recommendation <u>Firhouse to N81 Bridge</u> The proposed Firhouse-N81 bridges serves to provide an alternative means of access from the Firhouse area to Tallaght. At present, the only direct means of access from this area to Tallaght is via the Oldbawn Bridge. This area experiences significant congestion at the AM and PM peaks (resulting</p>

<p>3. Objection to bridge proposal on basis of impact on Dodder Valley Park, impact on wildlife and conflict with objectives contained within the Draft Development Plan. (DRAFTDEVPLAN0008, BRENDAN LYNCH DRAFTDEVPLAN0015, Donna Riordan DRAFTDEVPLAN0271, Colm Brennan)</p> <p>4. Objection to Firhouse - N81 Bridge proposal on basis of: 1. Impact of fragmentation, traffic noise, light pollution and fumes on the peaceful atmosphere and natural setting of the Dodder Valley including Dodder Valley Park and Kiltipper Park. 2. Detraction from the use of the Dodder Valley Park by people. 3. Impact on the pNHA and wildlife within the Dodder Valley. 4. Traffic implications for the Firhouse Road and locality. (DRAFTDEVPLAN0029, Jacinta CuthbertDRAFTDEVPLAN0030, Jacinta Cuthbert DRAFTDEVPLAN0034, Gerard Kavanagh)</p> <p>5. Objection to bridge proposal on the basis of impact on Dodder Valley as a recreational and natural amenity. (DRAFTDEVPLAN0031, Tony CuthbertDRAFTDEVPLAN0032, Deirdre Kelly)</p> <p>6. Objection to bridge proposal on basis of traffic safety for children, fragmentation of Dodder Valley Park and absence of need for bridge. (DRAFTDEVPLAN0039, Maeve McMahon DRAFTDEVPLAN0045, Maeve McMahon)</p> <p>7. Objection to bridge proposal on basis of noise pollution/disturbance, absence of need for bridge and impact on Dodder Valley Park and Convent. (DRAFTDEVPLAN0038, Claire Groarke)</p> <p>8. Objection to bridge proposal on basis of encouraging further traffic, impact on Dodder Valley Park including wildlife and impact on</p>	<p>in long delays for bus services). The development of the lands to the south within the Ballycullen-Oldcourt Local Area Plan will place additional pressure on this junction.</p> <p>The Firhouse-N81 bridge has been included in the Draft Transport Strategy 2016-2035 for the Greater Dublin Area. Section 4.2.5 refers to 'a public transport bridge over the Dodder to the east of Tallaght from Firhouse Road to the N81'.</p> <p>The Draft Transport Strategy recognises that this bridge is required in order to deliver effective public transport services through the Firhouse-Oldbawn area. As detailed above, the Draft Transport Strategy, a significant number of high frequency services have been proposed to service the area services are proposed from which the area will benefit, namely:</p> <ul style="list-style-type: none"> ▪ Tallaght - Clongriffin Bus Rapid Transport. ▪ Tallaght - Rathfarnham – Terenure Core Radial Bus Route ▪ Tallaght - UCD/Dundrum Core Orbital Bus Corridor <p>The provision of these services will be the subject of a route selection process. This will include the option of utilising the existing Oldbawn Bridge. This area is however is subject to a number of constraints including:</p> <ul style="list-style-type: none"> ▪ Limited road space: At present there is no available road space to enable the provision of segregated bus lanes. The creation of the additional space will require the widening/duplication of the existing bridge and the compulsory purchase of sites. ▪ Delays at multiple junctions: There are three signalised junctions within 200m of the Old Bawn Bridge. It is also likely that the junction of the R113 and Killinenny Road will need to be upgraded in future, resulting in four signalised junctions within 400m. ▪ Built heritage: The Oldbawn Bridge is a listed on Record of Monuments and Places (Schedule 1). The weir immediately adjacent to the bridge is listed on the Record of Protected Structures (schedule 2). This would have major implications for the widening and/or duplication of the
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<p>Convent. (DRAFTDEVPLAN0040, Fergus Corrigan)</p> <p>9. Firhouse Bridge Objection - absence of need Objection to bridge proposal on basis of absence of need for bridge, impact on convent land, traffic safety for children and fragmentation of Dodder Valley Park. (DRAFTDEVPLAN0047, Marion Phillips)</p> <p>10. Recommendation to remove the current long term objective linking the Firhouse Road to the Tallaght By Pass (N81) at Glenview (Table 6.6 - Medium to Long Term Road Objectives, Firhouse-N81 Bridge). (DRAFTDEVPLAN0078, Cllr Colm Brophy)</p> <p>11. Objection to the proposed new road/bridge across the Dodder Linear Park from Firhouse Road to the Glenview roundabout due to:</p> <ul style="list-style-type: none"> - Disruption to wildlife, natural habitats and trees along the Dodder Linear Park. - Loss of amenity during construction period and ongoing development of Dodder Linear Park. - Increased traffic on Firhouse Road and associated safety concerns. - Alternative options to widen the existing Old Bawn Bridge and/or connect Spawell Bridge to Knocklyon to help traffic flow. - Negligible contribution to public transport use. - Restricted access to proposed bridge from areas of Old Bawn and Aylesbury. <p>(DRAFTDEVPLAN0097, Martin & Mary Behan)</p> <p>12. Objection to bridge crossing between N81 and Firhouse Road on basis of adverse impact on success of linear park and new pedestrian crossings, intrusion/erosion of green spaces, negative impact on wildlife movement, and addition of further traffic in the area.</p>	<p>bridge.</p> <ul style="list-style-type: none"> ▪ Additional pressures: As noted above, congestion in this area is likely to increase with the development of lands associated with the Ballycullen-Oldcourt LAP. <p>Taking this into account it is difficult to see how the levels of service required for BRT and the Core Bus Network could be achieved via the Old Bawn Bridge, particularly for all three services. As such should the proposed Firhouse-N81 be omitted from the Draft Plan, it is likely that high frequency services will be routed elsewhere such as via Spawell and the N81. From a suitable transport perspective this would be suboptimal, as large sections of this route are sparsely populated.</p> <p>It should be noted that the proposed location of the bridge is indicative only, and would need to be finalised following a more detailed appraisal and design process. This would include environmental and transport/traffic appraisals (such as an Environmental Impact Statement), which will require a range of alternatives to be considered and would address detailed concerns regarding the impacts of any proposal.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
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[\(DRAFTDEVPLAN0059, Patrick Farrell\)](#)

13. Chapter 6 Transport & Mobility - Firhouse - N81 Bridge - Short name: Firhouse-N81 Bridge (6.4.0 Road and Street Network)
Objection to the proposed new road/bridge across the Dodder Linear Park from Firhouse Road to the Glenview roundabout due to:
- Fragmentation of existing lands,
 - Introduction of noise, fumes and artificial light disturbance,
 - Impact on wildlife and amenity of park users,
 - Conflict with Plan policies to protect and enhance landscapes and associated natural and built heritage features,
 - Impact on green infrastructure features of the Dodder Valley Park.
- [\(DRAFTDEVPLAN0138, Janis Morrissey\)](#)
14. Objects to and questions the logic behind the N81 to Firhouse Road bridge at Glenview. Tax payers money wasted building an unnecessary road, destroying natural beauty, landscape and wildlife for the sake of a half a mile stretch of road that literally goes nowhere.
[\(DRAFTDEVPLAN0033, Mark Barrett\)](#)
15. Opposes the building of the proposed road/bus corridor to go through Dodder Valley Park on grounds that the park is full of important wildlife and is a valuable amenity.
[\(DRAFTDEVPLAN0036, Cathy Mc Dermott\)](#)
16. Objects to the proposal for a new road through dodder valley park from the Glenview roundabout to Monalea due to the loss of part of the park to facilitate it.
[\(DRAFTDEVPLAN0054, eoin dundon\)](#)
17. Objects to the proposal for a new bridge from the N81 at Glenview roundabout to Firhouse Road. Proposed bridge would increase traffic and make it difficult to exit local estates onto Firhouse Road. Traffic is already drawn to the Knocklyon end of Firhouse to access

the M50 and the proposed bridge would also bring traffic heading for Tallaght in the same direction.

[\(DRAFTDEVPLAN0055, Karl & Mary Kelly\)](#)

18. Objection to a road running from Firhouse Road through the grounds of the Carmelite Monastery as it would be detrimental to feasibility of the Cherith Centre, which is a therapy centre nestled within the grounds of the Carmelite Monastery on the Firhouse Road.

[\(DRAFTDEVPLAN0086, Yvonne Smith, Cherith Therapy Centre \(Not for profit organisation\) DRAFTDEVPLAN0107, Sarah Holland, Mayor , Cherith Centre\)](#)

19. Objection to new road linking connecting the N81 at the Glenview roundabout with Firhouse due to the development of this proposed road being in direct conflict with the Council's own proposal to protect enhance and further develop green infrastructure within the County, and due to the need to protect the natural habitat of the fauna and flora living within the linear park.

[\(DRAFTDEVPLAN0273, Anne-Marie Dermody, Councillor/Solicitor\)](#)

20. Objection to Firhouse - N81 bridge proposal on basis of detriment to Dodder Valley as a recreational amenity and wildlife environment and increase in noise levels and car pollution in an area that includes housing, a nursing home and convent.

[\(DRAFTDEVPLAN0134, William Cullen Cullen\)](#)

21. Objection to Firhouse - N81 Bridge proposal on basis of disturbance of habitats and biodiversity in Dodder Valley Park and suggested alternative of providing public transport and cycle routes to ease the pressure on the existing road network.

[\(DRAFTDEVPLAN0178, Dublin South West Green Party\)](#)

22. Submission from Knocklyon Network supports the Firhouse - N81 Bridge proposal on the basis that it has the potential to enhance the BRT and other transport services.

[\(DRAFTDEVPLAN0180, Eugene Barrett, Knocklyon Network Ltd.\)](#)

23. Objection to the proposed new road/bridge across the Dodder Linear Park from Firhouse Road due to:
- Loss of amenity and impact on quality of life of existing residents,
 - Impact on visual amenity of the area, including views and prospects from the Tallaght bypass
 - Impact on biodiversity, loss and bisection of habitats, and light pollution,
 - Negation of restoration work on medieval weir,
 - Destruction of linear way to Bohernabreena lakes,
 - Traffic generation, congestion and management issues, and associated impact on existing residents including mobility and noise and air pollution,
 - Lack of technical information or environmental impact study regarding the proposal,
 - Potential impact of Dodder flood plain.

[\(DRAFTDEVPLAN0243, Stephen & Breda Cass\)](#)

24. Objection to the proposed new road/bridge across the Dodder Linear Park from Firhouse Road to the Glenview roundabout due to:
- Resultant traffic congestion at the junction of Ballycullen Road and Firhouse Road,
 - Safety concerns, including regarding access to local schools and risk to pedestrians and cyclists using the Tallaght-Ballyboden cycle route.
 - Impact of increased pollution levels on the health and wellbeing of existing residents.

[\(DRAFTDEVPLAN0213, Éamonn Maloney TD\)](#)

25. Request to omit proposed new road linking Glenview and Firhouse.

[\(DRAFTDEVPLAN0303, Bernie Finerty DRAFTDEVPLAN0304, Frances FinertyDRAFTDEVPLAN0308, Beatrice Donnelly DRAFTDEVPLAN0305, Helena & Terry Foley DRAFTDEVPLAN0306, Breda](#)

[Murphy DRAFTDEVPLAN0296, Kieran](#)
[CoakleyDRAFTDEVPLAN0307, Thomas](#)
[Clinton DRAFTDEVPLAN0297, Maurice](#)
[Haughton DRAFTDEVPLAN0318, Olive](#)
[Galvin DRAFTDEVPLAN0319, Pat PhelanDRAFTDEVPLAN0320,](#)
[Suzanne Moran DRAFTDEVPLAN0321, Catherine](#)
[Turley DRAFTDEVPLAN0322, Barbara](#)
[Ward DRAFTDEVPLAN0311, Hilary WalshDRAFTDEVPLAN0309,](#)
[Jim Carroll DRAFTDEVPLAN0332, Kieran](#)
[Coakley DRAFTDEVPLAN0323, William](#)
[Deverell DRAFTDEVPLAN0312, Carolyn](#)
[WhelanDRAFTDEVPLAN0310, Orla](#)
[Carroll DRAFTDEVPLAN0382, Piaras](#)
[MacLoughlainn DRAFTDEVPLAN0374, Martin](#)
[Donaghy DRAFTDEVPLAN0298, Graham](#)
[WalshDRAFTDEVPLAN0299, Frances](#)
[Griffin DRAFTDEVPLAN0300, Marie](#)
[O'Keeffe DRAFTDEVPLAN0301, Frank](#)
[Kilbride DRAFTDEVPLAN0302, Bridget](#)
[KilbrideDRAFTDEVPLAN0313, Hugh & Reiltinn](#)
[Reddy DRAFTDEVPLAN0314, Martin](#)
[Behan DRAFTDEVPLAN0315, Finbarr](#)
[Hurley DRAFTDEVPLAN0316, Michael](#)
[CassidyDRAFTDEVPLAN0317, Gerard](#)
[Blake DRAFTDEVPLAN0507, June](#)
[O'Brien DRAFTDEVPLAN0508, Stefan](#)
[Foster DRAFTDEVPLAN0364, Colette Colgan](#)
[FennessyDRAFTDEVPLAN0365, Noeleen](#)
[Fagan DRAFTDEVPLAN0366, Bobby](#)
[Stevens DRAFTDEVPLAN0367, Lorraine](#)
[Lavelle DRAFTDEVPLAN0368, Grainne](#)
[O'DonnellDRAFTDEVPLAN0369, Julian](#)
[Glavey DRAFTDEVPLAN0370, Ann Marie](#)
[Donaghy DRAFTDEVPLAN0371, Mairead](#)
[Flanagan DRAFTDEVPLAN0372, Mark and Tina](#)
[Walsh DRAFTDEVPLAN0373, Yvonne](#)

[Glavey DRAFTDEVPLAN0396, Tom & Jean Cantwell\)](#)

26. The Firhouse - N81 Bridge proposal will destroy an area of ecological and historic importance. Firhouse weir and watercourse will be located between the M50 and the new bridge affecting accessibility and wildlife.
([DRAFTDEVPLAN0224, Nuala Canavan](#))
27. Objection to Firhouse - N81 Bridge proposal on basis of impact on flora and fauna, impact on the linear park and impact on medieval weir.
([DRAFTDEVPLAN0227, Frank Canavan](#))
28. Objection to bridge proposal on basis of impact on Dodder Valley Park, fragmentation, associated, impact on use of paths, impact on wildlife and conflict with objectives contained within the Draft Development Plan.
([DRAFTDEVPLAN0270, Colm Brennan](#))
29. Submission supporting the new bridge linking Firhouse Road with Tallaght bypass.
([DRAFTDEVPLAN0509, Niall Morton, Mortons Pub](#))
30. Objection to bridge proposal on basis of damage to Dodder Valley, increased traffic on Firhouse Road, required junction at entrance to Monalea Wood, existing link road with Spawell, noise and objection to link with Tallaght. It is suggested that the Old Bawn junction be developed.
([DRAFTDEVPLAN0484, Noelle Briggs](#))
31. Objection to bridge proposal on basis of opportunity to extend Old Bawn Bridge, increased traffic and noise on Firhouse Road and disturbance of Dodder Valley Park and Convent from noise and pollution.
([DRAFTDEVPLAN0486, Brenda O'Connor](#))

<p>32. Objection to bridge proposal on basis of interference with habitats and environment of Dodder River; disruption of plans for cycle path along Dodder River; impact on enjoyment of Dodder walkway; loss of green amenity space to a road with hard surface and lighting; cost; absence of requirement; negative impacts on Convent and school; negative impact on environment and communities; presence of existing road access and crossings via Spawell roundabout, Old Bawn Bridge and the M50; presence of Luas in Tallaght; and requirement for new junction and increased traffic congestion on Firhouse Road. It is suggested that the Old Bawn junction or the Firhouse Road be widened as an alternative. (DRAFTDEVPLAN0487, Bernadette Weir)</p> <p>33. Object to bridge across the Dodder through the Dodder Valley connecting Firhouse Road and N81 as the this area of the valley is the most unspoilt and the road would seriously injure the flora, fauna and general amenity of the area. Furthermore, the proposal would undermine the concept of the Green Infrastructure Network and create an undesirable precedent. (DRAFTDEVPLAN0326, Joseph Scully)</p> <p>34. Submission from land owner at Firhouse Road outlining that the incorporation of the proposed Medium to Long Term Road Objective from Firhouse to N81 in the Development Pnan is premature for the following reasons:</p> <ul style="list-style-type: none"> -Insufficient network analysis studies to justify link -Link isn't a significant traffic desire line -Main justification of the link seems to be the 'Tallaght Swiftway' and it is inappropriate to sterilise such an alignment corridor until the design of the Swiftway is advanced. -Adoption of the alignment requires a detailed environmental assessment of the impact on the NHA. -Other traffic alleviation measures at Oldcourt Centre and Bridge should be exhaustively examined prior to adopting this link. -Proposed alignment of the link passes unnecessarily close to the Carmelite Monastery and impinges the setting. 	
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([DRAFTDEVPLAN0389, Tom Walshe, Muir Associates, Carmelite Sisters](#))

35. Propose that the proposed bridge across the Dodder be removed and an alternative route for the BRT Swiftway to run the length of Firhouse Road and cross closer to the existing Old Mill Bridge be planned.

([DRAFTDEVPLAN0387, Tom Gurrie](#))

Oldcourt - Oldbawn Bridge

1. Submission in favour of bridge suggests that the proposals should be include in the six year road programme.
([DRAFTDEVPLAN0256, Mairead Flanagan](#))
2. Submission requests that the long term roads objective from Bohernabreena to Kiltipper be removed as the road would adversely impact on the development of the subject lands for sporting facilities, a nursing home, retirement facility and possibly limited low density residential development. In the event that the road is retained, submission requests the realignment of the road eastwards and that the alignment be agreed in advance with us and Thomas Davis to ensure that the scope of the project isn't adversely impacted.
([DRAFTDEVPLAN0203, Eoin O Cofaigh, McHugh O Cofaigh Architects, David Kennedy](#))
3. Submission notes objection to proposed road crossing the Dodder at Kiltipper (Oldcourt-Oldbawn Bridge) due to the high amenity value of the area.
([DRAFTDEVPLAN0261, Gerard Stockil, Tallaght Community Council](#))

Oldcourt-Oldbawn Bridge

The proposed Oldcourt-Oldbawn will provide an alternative means of access from the Ballycullen-Oldcourt area to Tallaght. At present, the only direct means of access from these areas to Tallaght is via the Oldbawn Bridge. As noted above, this area experiences significant congestion at the AM and PM peaks. The development of the lands to the south within the Ballycullen-Oldcourt Local Area Plan will place additional pressure on this junction.

The Oldbawn-Oldcourt Bridge is also included in the Draft Transport Strategy 2016-2035 for the Greater Dublin Area. Section 4.2.5 refers to a 'link road Oldcourt Road to Kiltipper Road'. The Draft Transport Strategy recognises that by providing direct access to the Ballycullen-Oldcourt LAP lands, pressure will be reduced on the existing Oldbawn Bridge. As noted above in relation to the Firhouse-N81 bridge, this is critical for the delivery of quality public transport services in the area.

Also as noted above in relation to the Firhouse-N81 bridge, the proposed locations of the bridges are indicative only and would be finalised only following a detailed appraisal and design process. This would include environmental and transport/traffic appraisals (such as an Environmental Impact Assessment). This will also require a range of alternatives to be considered and would address detailed concerns regarding the impacts of any proposal.

<p>Firhouse - N81 Bridge & Oldcourt - Oldbawn Bridge</p> <ol style="list-style-type: none"> 1. There could be significant adverse environmental impacts from the proposed Firhouse - N81 and Oldcourt - Oldbawn Bridge crossings, however, they should not be ruled out and further exploration of alternative solutions is required such as the provision of one or two bridges, widening the Old Bawn Bridge or provision of a new bridge to the west. (DRAFTDEVPLAN0104, Warren Whitney) 2. Objection to bridge proposals on basis of impact on unique amenity of the Dodder Valley; pollution (noise and light); risk to biodiversity including protected species and wildlife corridor; fragmentation; impact on pNHA and SAC and impact on Dodder Greenway. (DRAFTDEVPLAN0335, Victorica White, Dodder Action) 3. Submission suggests an alternative solution to the Firhouse/ N81 road. The solution is to provide the bridge from Bohernabreena to Kiltipper Road and to upgrade the section of Kiltipper Road from Old Bawn to the Kiltipper Nursing Home. This would facilitate traffic diversion from Old bawn Road via Kiltipper Way to the N81/ Tallaght Town Centre/ Tallaght Hospital. (DRAFTDEVPLAN0326, Joseph Scully) 4. Submission from DAHG advises that the proposed new bridge over the Dodder from Bohernabreena Road to Kiltipper Road has the potential to remove habitats that are outside Natura 2000 sites but are listed under the Habitats Directive. The proposed crossing upstream of the city weir at Firhouse will impact on the Dodder pNHA. (DRAFTDEVPLAN0510, Simon Dolan, Department of Arts, Heritage and the Gaeltacht) 	<p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p>
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Chapter 6 Summary of Recommended Amendments to the Draft Plan

Section	Response Issue	Recommendation
6.1.0 Overarching Policies & Objectives	Overarching Policies & Objectives	<ol style="list-style-type: none"> 1. That Section 6.1.0 <i>Overarching</i> of the Draft Plan be modified to clarify that sustainable modes include public transport, cycling and walking. 2. That Section 6.1.2 <i>Integrated Transport Studies</i> of the Draft Plan be modified to make reference to some of the specific works required to improve pedestrian and cyclist mobility.
6.2.0	NTA Role	Amend section 6.2.0 <i>Public Transport</i> of the Draft County Development Plan to acknowledge the NTAs role in the provision of public transport services.
6.2.0 Public Transport	New/Enhanced Services	<p>It is recommended that Actions under (TM) Policy 2 be modified to:</p> <ol style="list-style-type: none"> 1. Make reference to the Core Bus Networks 2. Omit the reference to the extension of the BRT from Tallaght to Dundrum / Sandyford. 3. Omit the Action referring to a future public rail transport corridor between Saggart and Hazelhatch. 4. That the word 'former' be inserted prior to any references to Metro-west.
6.3.0 Walking and Cycling	Accessibility and Links	That an action be added to (TM) Policy 3 Walking and Cycling stating that the Council will undertake a series of studies in association with the NTA and TII that seeks to address accessibility and permeability issues in the vicinity of existing and proposed major public transport services.
6.3.0 Walking and Cycling	Design of Facilities	That the Actions listed under (TM) Policy 6 Road and Street Design be amended to make reference to the National Cycle Manual.
6.3.0 Walking and Cycling	Health Benefits of Walking and Cycling	That Section 6.3.0 of the Draft County Development Plan be amended to make reference to Healthy Ireland.
6.3.0 Walking and Cycling	Walking in Rural Areas	Amend Plan by cross-referencing (TM) Policy 3 Walking and Cycling with (HCL) Policy 16 Public Rights of Way and Permissive Access Routes.

6.4.0 Road and Street Network	Strategic Road Network.	<p>Amend Table 6.5 Six Year Road Programme and Table 6.6: Medium to Long Term Road Objectives to remove the proposals for the following junctions:</p> <ul style="list-style-type: none"> • Fonthill Road/N4 • Esker Lane/N4 • Tandy's Lane/N4 • Tay Lane/N7 Junction • Junction 8 (M50) <p>and</p> <p>That the Actions of (TM) Policy 5 Traffic and Transport Management be amended to make reference to the requirements of the Trans-European Transport Networks (TEN-T) Regulations and the recommendations of other policy documents such as the NRA M50 Demand Management Report 2014, DECLG Spatial Planning and National Roads: Guidelines for Planning Authorities 2012, and the N4 and N7 Corridor Study.</p>
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CHAPTER 7 - INFRASTRUCTURE & ENVIRONMENTAL QUALITY

7.1.0 Water Supply & Wastewater	
<ol style="list-style-type: none"> 1. Irish Water suggest that an additional objective be included in the written statement that supports the provision of additional strategic covered storage of treated drinking water at two location in the County. (DRAFTDEVPLAN0106, Olwyn James, Irish Water) 2. Irish Water suggest a suite of policies/objectives that the Council may consider for inclusion in the County Development Plan that would achieve the following: <ul style="list-style-type: none"> - Water Services: identify and facilitate timely delivery of required water services; ensure full consideration of investment required; maximise use of existing capacity ; ensure adequate capacity prior to the granting of planning permission; protect existing way leaves and buffer zones. - Water Supply: Protect ground and surface water resources; minimise wastage; promote water conservation and demand management. - Wastewater Services: Provide adequate storm water infrastructure for planned levels of growth; require provision of foul and surface water drainage systems; prohibit discharge to combined sewers; refuse residential development that requires private waste water treatment other than single houses; ensure changeover from septic tanks to collection networks and discourage individual septic tanks; ensure private wastewater treatment plants comply with their wastewater discharge license; require existing developments to connect to public sewers. (DRAFTDEVPLAN0106, Olwyn James, Irish Water) 3. Augment policy on water conversation with policy in the Housing Chapter that promotes residential developments that takes account of the need to conserve water by incorporating dual water systems (rain water and main). (DRAFTDEVPLAN0212, Doireann Ni Cheallaigh, An Taisce) 	<p>Chief Executive's Response and Recommendation</p> <p>The Chief Executive acknowledges the submission from Irish Water and recognises the importance of working in conjunction with Irish Water in Section 7.1.0 Water Supply and Wastewater to ensure that the provision of water/wastewater services will not be a limiting factor in terms of forecasted growth.</p> <p>The Irish Water submission includes an additional objective to support the provision of additional strategic covered storage of treated drinking water at two location in the County be added. The Chief Executive accepts the content and recommends inclusion of this objective. Additionally, as part of the submission, Irish Water attached a suite of 18 policies/objectives that the Council may wish to consider for inclusion in the Draft Plan 2016-2022. The Chief Executive has assessed the merits of each of the 18 policies/ objectives and recommends some amendments to Section 7.2.0 of the Draft Plan and the inclusion of a new section under Section 11.6.0 Infrastructure and Environmental Quality to inform the implementation of the Plan.</p> <p>The Chief Executive considers that some of the policies requested by Irish Water are adequately covered in the Draft Plan under Section 7.1.0 and some of the policies requested are outside the remit of the County Development Plan or are operational matters for Irish Water.</p> <p>Additionally, Irish Water requested that an objective be included in the Draft Plan to ensure that full consideration of the level of investment required to provide water services be included as a consideration in the identification of areas for development. It is considered that this issue is addressed in the process of zoning land for development and is not required as an objective in the Draft Plan as the process of identifying areas for development is solely carried out via the Development Plan making process and Strategic Development Zones.</p>

<p>4. Request addition of objective to promote new residential developments that take account of the need to conserve water, by incorporating dual water systems - rain water for general usage, and piped, treated water for drinking. (DRAFTDEVPLAN0496, Patrick Leonard, An Taisce)</p>	<p>In response to the request to augment policy on water conservation, it is considered that the provision of IE1 Objective 9 and IE1 Objective 10 are adequate in this regard.</p> <p>Recommendation It is recommended that the Draft County Development Plan be amended to reflect the following 4 points:</p> <ol style="list-style-type: none"> 1. Amend the wording of IE1 Objective 2 to as follows: To work in conjunction with Irish Water to facilitate the timely delivery of ongoing upgrades and the expansion of water supply and wastewater services to meet the future needs of the County and the Region 2. Insert two new objectives in Section 7.1.0: <ul style="list-style-type: none"> ○ To support the provision of integrated and sustainable water services through effective consultation with Irish Water on the layout and design of water services in relation to the selection and planning of development areas and the preparation of Masterplans/LAPs/ SDZ Planning Schemes. ○ To support the provision of additional strategic covered storage areas for treated drinking water in the County to provide resilience and flexibility in the drinking water supply in the Greater Dublin Area 3. Insert a new subsection into Section 11.6.1: Water Management titled: (vi) Water Services Applicants should consult with Irish Water regarding requirements regarding way leaves and buffer zones around public water utilities and any capacity issues prior to applying for planning permission – where practicable. Additionally, to facilitate the provision of integrated and sustainable water services, applicants should consult with Irish Water in relation to the layout and design of water services. The provision of private waste water treatment facilities, other than single house systems, will be strongly discouraged and all new developments will be required to utilise and connect to the
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	<p>public wastewater infrastructure, where practicable.</p> <p>4. Amend the text of Action on page 121 of the Draft Plan to refer to Water Safety Plans.</p>
7.2.0 Surface Water & Groundwater	
<p>1. Submission on behalf of Roadstone Limited requests that IE2 Objective 7 be amended to only prevent development within restricted areas identified in the Bohernabreena/Glenasmole Reservoir catchment to that which would have significant adverse effects on the reservoir. (DRAFTDEVPLAN0151, Aoife Byrne, SLR Consulting, Roadstone Limited)</p> <p>2. Submitted that Objectives 7 & 9 under Section 7.2.0 be re-positioned in a revised Green Infrastructure Objective 4 in 8.2.0 Watercourses Network. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p>	<p>Chief Executive's Response and Recommendation</p> <p>The issues raised are acknowledged by the Chief Executive.</p> <p>The Bohernabreena / Glenasmole Reservoir Restricted Area Map is included in Schedule 4 of the Plan. The Map is the product of research carried out in the area for the Bohernabreena/ Glenasmole Study and outlines the areas within the Reservoir Catchment Area with a gradient of greater than 20% slope, areas within the catchment of feeder streams, the SAC/pNHA boundary and a 200m zone around the Reservoir.</p> <p>IE Policy 2 Objective 7 of the Draft Plan 2016-2022 states that is is the policy of the Council to generally prohibit development within restricted areas identified on the Bohernabreena/ Glenasmole Reservoir Restricted Areas Map contained in Schedule 4. It is considered that this objective to 'generally prohibit development' with the identified sensitive areas within the Catchment Area of the Reservoir and a SAC/pNHA is in accordance with the proper planning and sustainable development of the area.</p> <p>The proposal to re-positioning Objectives 7 & 9 from Section 7.2.0 to Chapter 8 of the Draft Plan, as referenced in a submission received, is noted by the Chief Executive. The objectives relate to development in proximity to water bodies and rivers in the County and the protection and enhancement of groundwater and surface water and are therefore relevant to Section 7.2.0.</p> <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p>

7.3.0 Flood Risk Management	
<ol style="list-style-type: none"> 1. Recommendation to summarise the recommendations of the SFRA (referred to in Section 2 SEA Methodology of the 2.3 Strategic Flood Risk Assessment) under Chapter 7 Infrastructure and Environmental Quality. (DRAFTDEVPLAN0052, David Galvin, Environmental Protection Agency) 2. Concerned that additional housing on lands adjacent to Lucan Pitch and Putt will exacerbate the flooding situation in Lucan. (DRAFTDEVPLAN0084, Peter Keogh, Lucan Pitch & Putt Club) 3. No further development should be allowed on lands that drain into the Camac River until such time as flood control measures are put in place. Fluvial flooding from the Camac has become worse in recent times and is causing problems in Greenogue Business Park, which is also in the Grifeen catchment. This also has the potential to cause problems in residential areas of Lucan. (DRAFTDEVPLAN0103, con McCarthy, Greenogue Management No2 Ltd DRAFTDEVPLAN0102, con McCarthy, Greenogue Management No2 Ltd DRAFTDEVPLAN0101, con McCarthy, Greenogue Management No2 Ltd) 4. That the South Dublin County Council Development Plan should make provision for additional flood defences along the River Poddle due to an increase in extreme weather the river is likely to flood again into the future as it did in 2011. Flood defences would contribute to the well being of residents near the Poddle. (DRAFTDEVPLAN0220, Paul Hand) 5. Submission on the Strategic Flood Risk Assessment with particular reference relating to the recommendation 'to investigate flood zones for undefended scenario at Greenogue Industrial Estate to comply with the Guidelines'. Submission is concerned by the limited understanding of 	<p>Chief Executive's Response and Recommendation</p> <p>The Chief Executive notes the submissions in relation to flood risk management and assessment, including the comments of the Department of Environment, Community and Local Government and the Office of Public Works (OPW). The Chief Executive responses are addressed under the following headings:</p> <ul style="list-style-type: none"> ▪ Flood Risk Assessment ▪ Development Plan Preparation & Flood Risk ▪ Greenogue Business Park ▪ Poddle Flood Defences ▪ Camac River ▪ Moneenalion Commons, Baldonnell ▪ Lucan Pitch and Putt / Beattie's Field ▪ Structure <p><u>Flood Risk Assessment</u></p> <p>See the Chief Executive collated response to the Department of Environment, Community and Local Government submission in Section 0.5.1.1 of this report.</p> <p>Recommendation</p> <p>It is recommended that the initial SFRA be amended to inform the preparation of the Draft Plan in conjunction with the consultants to produce a finalised Strategic Flood Risk Assessment (SFRA).</p> <p><u>Development Plan Preparation & Flood Risk</u></p> <p>See the Chief Executive collated response to the Department of Environment, Community and Local Government submission in Section 0.5.1.1 of this report.</p> <p>Recommendation</p> <p>It is recommended that the initial SFRA be amended to inform the preparation of the Draft Plan in conjunction with the consultants to</p>

<p>the Guidelines presented in the SFRA and the potential knock on effect on how the estate will be served by insurance cover and future infill development.</p> <p>Outlines that it is inappropriate to amend the Flood Zones to consider an undefended Griffeen River, to do so would be inconsistent with the approach applied to other schemes across the country which involve storage. The need to consider an 'undefended' scenario as being representative of revised Flood Zones through Greenogue Business Park is not in common with best practise at many other flood storage/reservoirs across the country.</p> <p>(DRAFTDEVPLAN0159, Con McCarthy, Greenogue Management No 2 Ltd)</p> <p>6. Submission from the OPW brings attention to the obligations of a Local Authority on matters of flood risk. It is outlined that the Flood Risk Management Guidelines place on onus of Local Authorities to follow the hierarchical order of avoid, substitute, mitigate and (where justification has been passed) manage flood risks and that this should be applied to historically zoned areas as well as those under consideration for future development. Submission welcomes SDCC commitment to the Guidelines and the production of the SFRA for the CDP.</p> <p>The submission outlines that the Eastern CFRAM study will, in improved detail, identify the fluvial flood zones for areas of significant risk and deliver draft flood maps as appropriate to a Stage 2 FRA and states that it is the responsibility of the Local Authority to assign appropriate development in flood risk areas.</p> <p>It is advised that PFRA mapping is indicative only and is not suitable as the sole basis for planning decisions where a Stage 2 FRA is required. Noted that the produced SFRA acknowledges same. The confidence attributed to PFRA mapping on Table 4.7 should be amended to low.</p>	<p>produce a finalised Strategic Flood Risk Assessment (SFRA).</p> <p><u>Greenogue Business Park - Defended Area:</u> The submission in relation to the consideration of flood risk at Greenogue Business Park is noted by the Chief Executive. The submission outlines that residual flood risk for any infill development in the Greenogue Business Park can be defined and managed by policy within the Draft Plan 2016-2022 that stipulates consideration within a Flood Risk Assessment (FRA) at Development Management stage. The primary concern of the submission on this issue is the inclusion of Greenogue in Table 5.2 of the SFRA, and the text which states 'Investigate flood zones for undefended scenario at Greenogue Industrial Estate to comply with the Guidelines'. A submission received raised specific concerns regarding this issue, and the potential effect on insurance cover in the estate and for future infill development. The Chief Executive accepts the content of the submission and the review of the SFRA in conjunction with RPS consultants will remove the text 'Investigate flood zones for undefended scenario at Greenogue Industrial Estate'.</p> <p>Recommendation It is recommended that the updated SFRA, carried out in conjunction with the consultants, be amended to remove reference to investigating flood zones for undefended scenario at Greenogue Industrial Estate.</p> <p><u>Poddle Flood Defences</u> The Chief Executive acknowledges the submission in relation to the need for flood defences along the Poddle River. The issue of this submission is addressed in Infrastructure & Environmental (IE) Policy 3 Objective 3 of the Draft Plan 2016-2022. This objective states: To support and facilitate the delivery of flood alleviation schemes in South Dublin County, including the following schemes:</p> <ul style="list-style-type: none"> ▪ Poddle Flood Alleviation Scheme. ▪ Ballycullen Flood Alleviation Scheme.
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<p>Stage 2 FRA should be undertaken as part of the Development Plan where there is an intention to zone and develop lands that may be at flood risk based on the findings of the Stage 1 investigation. It is noted that Section 5.3 of the Strategic Flood Risk Assessment identifies a number of specific areas and recommends that a Stage 2 Flood Risk Assessment should be undertaken for any development proposals. The guidelines on Planning and Flood Risk Management require Stage 2 FRA to be undertaken by forward planning when land use zonings are being decided upon.</p> <p>Noted that this submission superseded Ref 0325 from OPW (DRAFTDEVPLAN0340, Karen Donovan, OPW DRAFTDEVPLAN0325, Karen Donovan, OPW)</p> <p>7. The submission of the Eastern and Midland Regional Assembly notes that the report on flood risk in the Baldonnell Area identifies Flood Risk A and B areas within the 'EE' zoning objective at this location and that IE3 SLO 1 sets out to require the preparation of flood risk assessment to be submitted with any proposal for development on the lands. It is advised that, in accordance with the Planning and Flood Risk Assessment Guidelines, a justification test for the lands should take place at this stage of the development plan process in the assessment of Development Plan zonings. It is therefore advised that the zoning objective of the lands in Baldonnell is inappropriate in a flood risk area and should be reconsidered. (DRAFTDEVPLAN0500, Malachy Bradley, Eastern and Midland Regional Assembly)</p> <p>8. Submission requests immediate flood risk assessment on all zoned lands in the County to identify lands that are zoned on floor plains or at risk of flooding, and de-zoned. (DRAFTDEVPLAN0170, Neville Graver, Rathcoole Community Council Limited)</p> <p>9. Submission advises that photograph record from 1898 shows flooding</p>	<ul style="list-style-type: none"> ▪ Whitechurch River Flood Alleviation (at Rathfarnham), part of the Dodder CFRAMS <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Camac River</u> The content of the submissions in relation to the Camac River are noted. The Camac River catchment is part of the Eastern CFRAMS which is currently being prepared by the Office of Public Works (OPW). The draft mapping for the Eastern CFRAMS are currently on public consultation and will be finalised in 2016. Following the Eastern CFRAM, an associated Flood Risk Management Plan (FRMP) will be prepared.</p> <p>As part of the County Development Plan and SEA process 2016-2022, an initial Strategic Flood Risk Assessment (SFRA) to inform the Draft Plan was also carried out for the County to identify flood risk areas. In accordance with the sequential approach in the Guidelines for Planning Authorities on Flood Risk Management, as published by the OPW and DECLG in 2009, the initial SFRA and the Eastern CFRAM have informed the land use zoning of the Camac catchment and resultant rezoning of lands at Baldonnell subject to Enterprise Priority (EP2) zoning under the current Plan 2010-2016 to Rural (RU) in the Draft Plan 2016-2022, and the recommendation in this Chief Executive report to rezone lands at Moneenallon Commons, Baldonnell from 'EE' in the Draft Plan 2016-2022 to Rural (RU).</p> <p>All lands that are zoned in the County Development Plan will be assessed at application stage in accordance with the Guidelines for Planning Authorities on Flood Risk Management as published by the OPW and DECLG in 2009.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be</p>
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<p>on lands proposed for housing near Adamstown, Lucan. It is advised that the low lying area bordering the Griffeen River is at risk of flooding and that this area has not been modelled yet under the CFRAM. (DRAFTDEVPLAN0405, Mr & Mrs Power)</p> <p>10. Submission received from the Department of Environment, Community and Local Government. Submission notes that the Draft Plan is accompanied by a Strategic Flood Risk Assessment (SFRA) which is identified as a Stage 1 (Flood Risk Identification Report), and that in section 5.3.14 of this report, several specific areas of the county are recommended for a Stage 2 Flood Risk Assessment as greater detail is required in relation to flood risk - Clonburris, Hazelhatch, Fortunestown, Jobstown, Aungierstown & Ballybane, Baldonnell, Ballycullen & Oldcourt, Brittas, Greenogue, Lucan Village and New Nangor Road. Submission states that in accordance line with 'The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)' it is considered that this Stage 2 Flood Risk Assessment is required to inform the proposed zoning of lands for development in the Draft Plan. The submission states that this should include the provision of maps clearly overlaying proposed zoned lands with lands indicated as in Flood Zones A, B & C as per the Guidelines; the sequential approach in flood risk management (see Figure 3.1 of the Planning Guidelines), and where applicable the justification test, need to be applied to the zoning of lands for development. (DRAFTDEVPLAN0183, Minister for Environment, Community & Local Government, Department of the Environment, Community & Local Government)</p> <p>11. The most important flood risk management issues in Greenogue and the wider Baldonnell area do not relate to the Griffeen River, they relate to significant overland flows generated by the Camac River. It is also noteworthy that the Draft SDCC Development Plan proposes to zone</p>	<p>amended.</p> <p><u>Moneenalion Commons, Baldonnell</u> The Chief Executive acknowledges the submissions and the concerns raised in relation to the 'EE' zoning of lands at Baldonnell. The Chief Executive agrees with the submissions to reconsider the zoning of these lands and recommends a Rural (RU) zoning.</p> <p>As part of the County Development Plan and SEA process 2016-2022, an initial Strategic Flood Risk Assessment (SFRA) to inform the Draft Plan was carried out for the County, with a further report on Flood Risk Assessment subsequently carried out due to the lands located at Moneenalion Commons being identified in the County study as having a potential risk. Additionally, the Eastern CFRAM study mapping identifies the area as having a potential risk. The foregoing provides an evidence base on flood risk in the County. The studies identify a significant portion of the site in question as being in flood risk zone A, with 'a high probability of flooding'.</p> <p>The Guidelines for Planning Authorities on Flood Risk Management were published by the OPW and DECLG in 2009. The Flood Risk Management Guidelines advises in relation to Flood Zone A that 'most types of development would be considered inappropriate in this zone' and that 'development in this zone should be avoided and/or considered only in exceptional circumstances'. These 'exceptional circumstances' require all parts of a Development Plan justification test to be met 'on a solid evidence basis'. It is considered that on the basis of the information currently available to the Planning Authority, this cannot be met in respect of the subject lands as the Planning Authority is not satisfied that 'it can be demonstrated on a solid evidence base that the zoning or designation for development will satisfy the justification test.'</p> <p>The DECLG Planning Policy Statement 2015, reiterates the Key Principles that should be used as a strategic guide to implementing proper planning and sustainable development of urban and rural areas</p>
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<p>lands adjacent to the Camac (south west of Moneenalion Common). The EE objective could significantly alter the dynamics of flooding in this area and increase risk to neighbouring property and people. No detailed flood risk assessment of the potential negative impacts of this zoning accompanies the SFRA and the issue is not resolved within the Draft SFRA (SFRA for SDCC Development Plan, Detailed Report on Flood Risk in the Baldonnell Area, May 2015 http://www.southdublinddevplan.ie/). In this instance the zoning has not been subject to the appropriate consideration of the Plan Making Justification Test contained within The Guidelines or under DECLG Circular PL 2/2014 where the nature and design of structural or non-structural flood risk management measures must be defined prior to future development zoning. (DRAFTDEVPLAN0159, Con McCarthy, Greenogue Management No 2 ltd)</p>	<p>and state that planning must be plan-led and evidence based. This follows on from the Planning and Development Amendment Act 2010, which requires an evidence based 'core strategy' as the basis for all County Development Plans.</p> <p>The Chief Executive recommends that the subject lands at Baldonnell be zoned for Rural 'RU'. This recommendation is based on evidence and information detailed in specifically commissioned reports prepared by independent consultants for the County Development Plan and the OPW produced Eastern CFRAM, as stated above.</p> <p>Section 4 of the Flood Risk Guidelines relates specifically to "existing, undeveloped, zoned areas at risk of flooding" and Sections 4.26 & 4.27 of the Guidelines state that "future flood risk assessments required to support the development plan process may highlight existing, undeveloped areas which, on their own merits, were zoned for development in previous development plans but which new information indicates may now, or in the future, be at risk of flooding". The Flood Risk Guidelines advise that "planning authorities should reconsider the zoning objective" and following this reconsideration, "may decide to:</p> <ul style="list-style-type: none"> ▪ Remove the existing zoning for all types of development; ▪ Reduce the zoned area and change or add zoning categories to reflect flood risk; ▪ Replace the existing zoning with a zoning or specific objective for less vulnerable uses; ▪ Prepare a local area plan informed by a detailed flood risk assessment to address zoning and development issues in more detail; and/or ▪ Specify in exceptional circumstances and where all of the criteria of the justification test have been met, details of...flood risk management measures as pre-requisites to development..." <p>Given the extent and location of flood risk zone A on the lands in question, it is considered that removal of the existing employment zoning where the lands remain undeveloped is the most appropriate</p>
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	<p>course of action, in line with the 'precautionary approach', which requires planning authorities to consider possible future changes in flood risk including the effects of climate change "so that future occupants are not subject to unacceptable risks". In effect this means not giving the benefit of the doubt' where risk has been identified. It also means that a site-specific solution does not appear to be an option when the risk relates to the catchment as a whole.</p> <p>It is of concern that IE3 SLO1 included in the Draft Plan is based on a presumption in favour of development with a Flood Risk Mitigation Strategy to be carried out by an applicant, as part of any development proposals on the site may result in works being required that are outside of an applicant's control. In effect, this would be likely to shift the burden of responsibility and associated cost to the local authority. It is therefore recommended that this SLO should be removed from the Draft Plan.</p> <p>Recommendation</p> <p>It is recommended that the Draft County Development Plan maps be amended to rezone the lands at Moneenalion Commons from EE in the Draft Plan to Rural (RU) and that IE3 SLO1 be removed from the written statement.</p> <p><u>Lucan Pitch and Putt / Beattie's Field</u></p> <p>As part of the County Development Plan and SEA process 2016-2022, a Strategic Flood Risk Assessment (SFRA) was carried out for the County to provide an evidence based report on flood risk. This report identifies the flood risk zones in the County, having regard to the best available data. The Eastern CFRAM draft mapping is also available to the public.</p> <p>In the context of the lands referred to in the submission received, the Eastern CFRAM identifies a small section of the lands adjacent to the banks of the Griffeen River as a Flood Zone A and part of the overall zoned lands in the north east sector as a Flood Zone B. These areas form part of a wider land bank of 16.78 ha which is zoned RES-N 'to provide for new residential communities in accordance with approved</p>
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	<p>area plans'. Flood Zone B accounts for 2.81 ha of the zoned lands, representing 16.75% of the overall lands. Flood Zone A accounts for a minor element of the site adjoining the river bank. Any flood risk issues can be addressed as part of the preparation of any future local area plan or planning scheme on the subject lands. To determine the appropriateness of the RES-N zoning at Beattie's Field, the sequential approach has been applied, which culminated in application of the Justification Test.</p> <p>The Justification Test for the site is detailed in Section 0.5.1.1 of this report.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Structure</u> It is noted that a submission requests that the recommendations of the SFRA be included in the Flood Risk Management section of the Draft Plan 2016-2022. The SFRA identifies the flood risk areas in the County and includes mapping, important assumptions and a report. It is considered that the extraction of the key results from the report independent of the mapping and assumptions would be misleading. The report is a separate document and is available to the public. Additionally, the data from the Eastern CFRAM supersedes the SFRA report and is viewed a 'live document'.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
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7.4.0 Information & Communications Technology	
<ol style="list-style-type: none"> 1. ESB notes the Draft Development Plan objective to facilitate the undergrounding of electricity, telephone and television cables. It is advised that careful consideration should be given in relation to over prescriptive wording that may be conflict with the 'Government Policy Statement on Strategic Importance of Transmission and Other Energy Infrastructure' (2012). (DRAFTDEVPLAN0150, Colm Cummins, Electricity Supply Board (ESB)) 2. ESB notes IE4 Objective 2, which sets out to facilitate the undergrounding of (inter alia) electricity cables. It is advised that new networks are generally installed underground in populated areas, however, where there is no road infrastructure, it is neither safe or economical to install underground cables until secure networks are available and costs can be shared. It is indicated that there should be a reduced expectation of undergrounding in rural areas of the County. (DRAFTDEVPLAN0485, David J Byrne, ESB Networks) 3. 1. Submitted that IE 4 Objective 3 in Section 7.4 be replaced by: Where feasible, proposed development pertaining to the installation of potentially obtrusive technology shall be located in non-sensitive landscapes. Protect areas of significant landscape importance from the visual intrusion of large scale telecommunications infrastructure. Submission also includes additional text pertaining to planning applications and assessment of same with regard to telecommunication structures and equipment, including location, visual impact, ecology, design and cumulative effects. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open) 4. 2. Submitted that IE 4 Objective 5 in Section 7.4 be replaced by Require the co-location of new or replacement antennae on existing masts or preferably a single mast so that the scale, character and sensitivity of the landscape is respected. Co-location and clustering of new masts on existing sites will be required unless a fully documented case is submitted explaining the precise circumstances which mitigate against 	<p>Chief Executive Response and Recommendations</p> <p>The submissions from the ESB are noted. The wording of IE Objective 2 includes a specific reference to urban areas for the undergrounding of (inter alia) electricity cables and, as such, indicates that there is a reduced expectation of undergrounding in rural areas of the County.</p> <p>The Chief Executive notes the submission requesting the replacement of IE4 Objective 3. The objective proposed in the submission provides detailed lists of the areas that should be protected from telecommunications masts and specific design requirements for such structures. IE Objective 3 states that is it the policy of the Council to permit telecommunications antennae and support infrastructure throughout the County, subject to high quality design, the protection of sensitive landscapes and visual amenity. The inclusion of 'subject to high quality design, the protection of sensitive landscapes and visual amenity' in the objective addresses the concerns of the submissions in a short and clear manner. The assessment of applications for such structures will be carried out on a case by case basis on their merits; it is not feasible to include each possible scenario within an objective wording.</p> <p>The Chief Executive notes the submission requesting the replacement of the objective in the Draft Plan in relation to proliferation of telecommunication masts. IE4 Objective 4 states that is it the policy of the Council to discourage a proliferation of telecommunication masts in the County and promote and facilitate the sharing of facilities. The Draft Plan also includes an Action in Section 7.4.0 of the Draft Plan, which states 'The Planning Authority will create and maintain a register of approved telecommunications structures supported by relevant databases in cooperation with operators.' Additionally, Section 11.6.2 of the Draft Plan outlines that in the consideration of proposals for telecommunications antennae and support structures, applicants will be required to demonstrate:</p> <ul style="list-style-type: none"> ▪ Compliance with the Planning Guidelines for

<p>co-location and clustering. Submission also includes additional text pertaining to co-location of telecommunications structures and equipment, including in relation to proliferation of masts, capacity issues, sharing of existing structures, and location; and assessment of planning applications for such structures including reference of relevant guidelines. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p> <p>5. Submitted that additional objectives be added to Section 7.4:</p> <ul style="list-style-type: none"> -Access roads will be permitted only where they are absolutely necessary. The applicant shall be required to demonstrate that the greatest care has been taken in terms of minimising visual impact on landscapes, particularly sensitive or historic landscapes, natural environment and Natura 2000 sites that they do not scar the landscapes and that they follow the natural contours so as to minimise their visual intrusion and should be bordered with scrubs. It shall be a condition of permission that the land is reinstated at the end of the construction period. In the event that a developer requires that an access track be retained, the developer shall indicate the justification for doing so as part of the planning application and indicate the frequency of visits which will be required to service the site and facility. -It shall be a condition the permission that when antennae and their support structures are no longer being used and no new user has been identified they should be removed and the site re-instated at the operator's expense and to the Council's satisfaction. It shall also be an obligation of the original operator to inform the Council if he intends to dispose of the site to another suitable operator. -Prohibit satellite dishes in areas which would cause unacceptable harm to visual amenities or would materially harm the character and appearance of rural areas. The design and visual appearance of masts, antennae of satellite dishes and their associated equipment shall be as unobtrusive as possible. Cumulative effect of dishes in the area should be considered. -In the interest of visual amenity and to protect the environment, telecommunication masts, cables and wire connections shall be located underground, particularly in high amenity/sensitive areas of open space 	<p>Telecommunications Antennae and Support Structures, 1996, and Circular Letter PL 07/12 issued by the Department of the Environment and Local Government (as may be amended), and to other publications and material as may be relevant in the circumstances.</p> <ul style="list-style-type: none"> ▪ On a map, the location of all existing telecommunications structures within a 2km radius of the proposed site, stating reasons why (if not proposed) it is not feasible to share existing facilities having regard to the Code of Practice on Sharing of Radio Sites issued by the Commission for Communications Regulation, 2003. ▪ Degree to which the proposal will impact on the amenities of occupiers of nearby properties, or the amenities of the area (e.g. visual impacts of masts and associated equipment cabinets, security fencing treatment etc.) and the potential for mitigating visual impacts including low and mid-level landscape screening, tree-type masts being provided where appropriate, colouring or painting of masts and antennae, and considered access arrangements. ▪ The significance of the proposed development as part of the telecommunications network <p>The contents of the submissions have been considered and noted; the wording of the Policies, Objectives, and Actions, including those detailed above, and location of same within Chapter 7 and Chapter 11 of the overall Draft Plan are considered adequate and appropriate with regard to the proliferation of telecommunication masts, the assessment of applications for telecommunication masts, the protection of the visual amenity and sensitive landscapes, access arrangements and the requirement for high quality design.</p> <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p>
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and on or within settings of archaeological sites and recorded monuments and areas of ecological importance and other environmentally sensitive areas.

- Where masts are located in areas of high amenity, landscapes of exceptional or high value or international or national importance and high sensitivity as indicated in the Landscape Character Assessment, there shall be a presumption to provide a 'Landscape Impact Report' to allow proper assessment of the visual impact. Surrogate (coniferous trees) shall be considered.
- Strive to reduce the number of telecommunication structures by ensuring that Com Reg's Code of Conduct is implemented.
- Masts will only be permitted if supported by an acceptable Visual and Environmental Impact Assessment Report. In sensitive landscape and amenity areas the presumption shall be that applications must meet the co-location requirements or be supported by a Visual Impact Assessment Report that will demonstrate that the development can be satisfactorily absorbed into the landscape. VIA required within a focal point/view or in sensitive landscapes. All planning applications on lands located in rural high amenity areas above 120m shall be accompanied by an assessment of the potential visual impact on the landscape demonstrating that impacts have been anticipated and avoided to a level consistent with the sensitivity of the landscape in order to support, protect and improve the landscape character of sensitive lands.
- VIAs will include details of: Landscape and topography, elevation and overall visibility, listed views or prospects in the area, buildings or trees between the site and principal viewing locations, the scale of the object in the wider landscape, the multiplicity of other objects in a wide panorama and the position of the object with respect to the skyline.
- When the owner of a site disposes of it they will be required to inform the Council so that they will be in a position to enforce any continuing conditions.
- Applicants shall demonstrate the significance of the proposed development as part of a national communications network.
- Discourage the development of individual telecommunications support structures and antennae for private use.
- Seek the establishment of an appropriate body at regional or national

<p>level to monitor installations regarding proliferation, co-location and the use of the best available technology to prevent negative environmental impacts.</p> <p>-Set up and maintain a register of approved telecommunication structures to provide a useful input in the assessment of future developments and to maximise the potential for future mast sharing and co-location.</p> <p>(DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p>	
<p>7.8.0 Aerodromes & Airports</p> <ol style="list-style-type: none"> 1. Request that restrictions associated with Casement Aerodrome remain unchanged from current Plan under the proposed Plan. (DRAFTDEVPLAN0172, Stephen Campbell, Citywest Ltd) 2. The Air Corps have concerns with regard to the removal of reference to 'Public Safety Zones' at Casement Aerodrome, Baldonnell. 'Public Safety Zones' are used in addition to 'Obstacle Limitation Surfaces' and serve a complimentary yet different purpose. Public Safety Zones are areas of land at the end of runways established to control the number of people on the ground at risk in the event of an aircraft accident on take-off or landing. The Air Corps have requested that the policy in respect of 'Public Safety Zones' as outlined in Section 2, Para 3.2.24 together with explanatory notes 1 & 2 and the further explanation as contained in S.4.0 of Schedule 4 of the current Development Plan 2010 - 2016 be included in the proposed new County Development Plan 2016 - 2022. (DRAFTDEVPLAN0165, Catherine Madden, Department of Defence) 3. Request to reword proposed Infrastructure and Environmental Quality Policy IE8 Objective 5, pertaining to Casement Aerodrome, from: Within the Department of Defence Inner Zone (delineated on Map), in addition to the Obstacle Limitation Surfaces for the Aerodrome, no buildings or structures exceeding 20m in height above ground level should be permitted. to: Within the Department of Defence Inner Zone (delineated on Map), in 	<p>Chief Executive's Response and Recommendations</p> <p>The Chief Executive has carefully considered the issues raised in relation to Aerodromes and Airports and provides responses and recommendations under the following subheadings:</p> <ul style="list-style-type: none"> • Public Safety Zones at Casement • Department of Defence Inner Zone • Obstacle Limitation Surfaces • Weston Aerodrome <p><u>Public Safety Zones at Casement</u></p> <p>The Chief Executive notes the submission from the Air Corps in relation to Casement Aerodrome. The submissions outlines that Public Safety Zones are areas of land at the end of runways established to control the number of people on the ground at risk in the unlikely event of an aircraft accident on take-off or landing and request that the Draft Plan include the Public Safety Zones and the appropriate text to restrict development. The Chief Executive accepts this submission and recommends amendment to the Draft Plan 2016-2022.</p> <p>Recommendation</p> <p>It is recommended that the Draft County Development Plan be amended as follows:</p> <ul style="list-style-type: none"> ▪ Insert the following into IE Objective 8 (a) In general, no development shall be permitted within the Public Safety Zones.

<p>addition to the Obstacle Limitation Surfaces for the Aerodrome, no buildings or structures exceeding 20m in height above ground level should be permitted except where specifically agreed in consultation with the Department of Defence that the proposed development will not affect the safety, efficiency or regularity of operations at the aerodrome.</p> <p>Rewording requested on the basis that technical developments in the design of sustainable buildings for data storage and related Information and Communications Technology (ICT) sector have advanced considerably in recent years. Submission notes that significant efficiencies in terms of energy conservation and sustainable operation can be achieved by optimising building arrangement and height, and that in many cases the capacity to increase height and reduce footprint of buildings can dictate the performance of the installation, and hence the viability of the development.</p> <p>Submission notes that the amendment to the text of IE8 Objective 5, as proposed, is consistent with the requirements for consultation set out in section 11.6.6 (Aerodromes) where there already is a clear requirement for pre-planning consultation with the Department of Defence on the part of the applicant, as well as a requirement for the Planning Authority to refer planning applications to the Department for proposed developments within the Inner Zone.</p> <p>Submission also notes that the proposed amendment to Objective 5 provides a sound technical basis, where specific enterprise and employment-related developments which functionally require a development height in excess of 20m, can be considered, by taking into account other determining factors such as:</p> <ul style="list-style-type: none"> • Relative distance of the development from the aerodrome. • Prevailing topography at the location of the development. • The nature of the development in terms of operation, security, occupation and risk. • The location and scale of development in relation to the Obstacle Limitation Surfaces. <p>(DRAFTDEVPLAN0214, Tony McGrath, PM Group, Google Ireland Ltd)</p> <p>4. Objection to extension of restricted zone in Kingswood Village on</p>	<ul style="list-style-type: none"> ▪ Insert the following paragraph into Section 11.6.6 Aerodromes under (iii) Development Restrictions at Aerodromes Public Safety Zones: Public Safety Zones are areas of land at the end of runways established to control the number of people on the ground at risk in the unlikely event of an aircraft accident on take-off or landing. These areas are delineated as a triangular shape on the Development Plan maps and in general, no development shall be permitted within these zones. <p><u>Department of Defence Inner Zone</u></p> <p>A submission received requested the rewording of Policy IE8 Objective 5 of the Draft Plan 2016-2022 in relation to the height restrictions within the Department of Defence Inner Zone. The submission proposes the rewording on the basis that technical developments in the design of sustainable buildings for data storage and related Information and Communications Technology (ICT) sector have advanced considerably in recent years. The Chief Executive accepts the general content of the submission and recommends that the Draft Plan be amended accordingly.</p> <p>Recommendation</p> <p>It is recommended that the wording of IE8 Objective 5 and Section 11.6.6 Aerodromes of the Draft County Development Plan be amended to include:</p> <p>Within the Department of Defence Inner Zone (delineated on Map), in addition to the Obstacle Limitation Surfaces for the Aerodrome, no buildings or structures exceeding 20m in height above ground level should be permitted except where specifically agreed in writing following consultation with the Department of Defence that the proposed development will not affect the safety, efficiency or regularity of operations at the aerodrome.</p> <p><u>Obstacle Limitation Surfaces</u></p>
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<p>flightpath into Casement Aerodrome by approximately 50 metres due to impact on existing and future residential and commercial development within same. (DRAFTDEVPLAN0378, Hugh O'Daly DRAFTDEVPLAN0375, Hugh O'Daly, H K O'Daly & Associates , Mr William James)</p> <p>5. Request that Objective EE42 in 2010 - 2016 County Development Plan is retained in the 2016-2022 Plan, ie SDCC seek to revert runway classification from Code 2B to Code 1A. (DRAFTDEVPLAN0237, william brehon, Combined action on weston airport ltd)</p> <p>6. Submission details that the 2016-2022 Development Plan should not include any policies which inadvertently prevent the appropriate enhancement of Weston Airport, without having the opportunity to submit a planning application complete with detailed analysis, professional expert studies relating to specialist and technical disciplines, etc.</p> <p>Submitted that the draft plan contains numerous policies and objectives which should not feature in a development plan intended to guide and inform proper planning matters. Indeed, the Irish Aviation Authority, as the competent authority in aviation licensing, legislation and policy, are mandated to manage such considerations. It is submitted that the draft development plan contains aviation specific policies which do not benefit from a complete understanding of the implications of such requirements when considered alongside the statutory obligations of national and European aviation legislation and policy.</p> <p>IE9 Objective 4 is deemed appropriate except in the case of potential conference centre facilities where the proximity to the airport or the complementary nature of the facility to the airport (or vice versa) may further enhance and consolidate development at the airport. Instead, appropriate development management assessment through planning application assessment is warranted.</p> <p>Submission outlines that IE9 Objective 5 and IE9 Objective limit the</p>	<p>The safeguarding requirements in the vicinity of civil aerodromes are principally set out as “International Standards and Recommended Practices” within Annex 14 to the Convention on International Civil Aviation, which was published by the International Civil Aviation Organisation (ICAO) and the Irish Aviation Authority Guidance Material on Aerodrome Annex 14 Surfaces, 2015. These provide dimensions and the basic criteria needed for the preparation of safeguarding maps for all civil aerodromes, with dimensions and criteria varying in relation to the size, shape and usage of different aerodromes. For each runway length category, the ICAO sets out different safeguarding requirements in the form of three-dimensional geometric shapes ‘Obstacle Limitation Surfaces’, which define the airspace and provide a framework for limiting the heights and/or closeness of any objects or structures on or in the vicinity of the aerodrome (with further variations depending on whether its runways have “instrument” status or not).</p> <p>Runway 11/29 is the existing main runway with east to west orientation and the subject of the submission in relation to Kingswood village. This runway is considered as an instrument approach Code 4 runway and the relevant Obstacle Limitation Surfaces of the Irish Aviation Authority Guidance Material on Aerodrome Annex 14 Surfaces, 2015, are applicable.</p> <p>The content of the Draft Plan 2016-2022 is in accordance with the Irish Aviation Authority ‘Guidance Material on Aerodrome Annex 14 Surfaces (2015)’ and is considered acceptable.</p> <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Weston Aerodrome</u></p> <p>The Chief Executive notes the concerns raised in submissions received in relation to Weston Aerodrome.</p> <p>The coding of the runway at Weston Aerodrome is a matter for the Irish</p>
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potential further development of the airport facility and requests clarity as a result of their potential impact on the future viability and activity of the facility. In addition, by restricting the ability of the airport to further develop its facility is may be deemed as inhibiting competition, with Dublin Airport and Casement Aerodrome given priority. It must also be noted that recent development has been identified as expansion towards Weston Airport, rather than the Airport expanding towards residential communities.

[\(DRAFTDEVPLAN0234, Weston Aviation Academy Ltd. c/o Stephen M. Purcell, Future Analytics Consulting Ltd., Weston Aviation Academy Ltd \(c/o Future Analytics Consulting Ltd.\), Weston Aviation Academy Ltd\)](#)

Aviation Authority. The aerodrome as a whole is currently licensed by the IAA as Code 2B and it is not within the remit of the Planning Authority to change the code of the aerodrome. The coding of the runway is linked to the length and width of the runway. In this context, it is considered that the content of IE9 Objective 5 of the Draft Plan 2016-2022, which states that is it the policy of the Council to restrict any further effective lengthening of the operational runway or over-run areas, is relevant and adequate.

In relation to the submission from Weston Aviation Academy Ltd, the Chief Executive notes the content of the detailed report. The issue raised in relation to the cross-over between land use planning and matters dealt with by the Irish Aviation Authority is acknowledged. The Chief Executive considers that the delineation of the Obstacle Limitation Surfaces is required in the Development Plan to protect the aerodromes in the County from incompatible land uses in the environs. In addition, aircraft noise and issues such as safety and other environmental impacts to land uses around aerodromes which need to be considered.

The submission outlines that there are specific restrictions (in particular IE9 Objective 5 and IE9 Objective 6 of the Draft Plan) being asserted to limit the potential further development of Weston. IE Policy 9 Objective 5 of the Draft Plan 2016-2022 seeks to restrict any further effective lengthening of the operational runway or over-run areas, with IE Policy 9 Objective 6 seeking to consolidate the development of the aerodrome within its existing setting, but restrict further growth given its proximity to Casement Aerodrome, Dublin Airport and neighbouring suburban residential areas.

The Chief Executive considers that the objectives limit the Aerodrome from increasing its required airspace and impinging on the land uses in the environs. The Draft Plan 2016-2022 outlines that it is the objective of the Council to maintain the airspace around the aerodrome free from obstacles so as to facilitate aircraft operations to be conducted safely, including restricting development in the environs of the aerodrome. The lengthening of the runway to attract larger aircrafts would change the

	<p>code of the runway and require a more extensive airspace and associated restrictions on development. Furthermore, having regard to the established residential communities in the area, the expanded airspace would result in aircrafts flying directly above incompatible land uses on the ground. It is accepted that part of the future vision for the aerodrome is to reinforce the position of the aerodrome as an aviation training facility. In this context, it is considered that the wording of IE9 Objective 6 of the Draft Plan should be amended to facilitate such ancillary on the ground uses.</p> <p>Recommendation It is recommended that the text of IE9 Objective 6 of the Draft County Development Plan be amended as follows: To facilitate the development of ancillary uses at the aerodrome within its existing setting and consolidate the aviation operations given its proximity to Casement Aerodrome, Dublin Airport and neighbouring suburban residential areas</p>
General	
<ol style="list-style-type: none"> 1. Request a natural sound barrier along the wall or a man-made structure to absorb sound to reduce the impact on Glenlyon residents of the elevated noise levels from R133 feeder road to M50. (DRAFTDEVPLAN0263, Graham Owens, Glenlyon Residents Association) 2. Submission relates to a proposal for the development of an oil storage terminal at Baldonnell, supplied via a pipeline from Dublin Port. Submission requests inclusion of the following objective in the draft Plan: 'Support and facilitate the construction of an oil pipeline and storage terminal in the Baldonnell / N7 area'. (DRAFTDEVPLAN0168, John Fingleton, Fingleton White, Fingleton White) 3. The submission from the Eastern and Midland Regional Assembly advises that resilience is a principle that could be considered in the 	<p>Chief Executive's Response and Recommendation The Chief Executive notes the content of submissions in relation to noise. In terms of the assessment of development applications, Section 7.7 of the Draft Plan 2016-2022, and in particular Section 11.6.3, are noteworthy. Section 11.6.3 of the Draft Plan outlines that the Planning Authority will have regard to the Dublin Agglomeration Environmental Noise Action Plan 2013-2018 when assessing development proposals along major road and rail transport corridors. Furthermore, development proposals with the potential to give rise to significant noise impacts may require a Noise Impact Assessment and mitigation plan to minimise noise disturbances and protect the amenities of the area. The location of noise sensitive developments will be carefully considered so as to ensure they are protected from major noise sources where practical.</p> <p>It is noted that a submission requests the provision of measures to alleviate noise levels from the R133 and the M50 at Glenlyon. Section</p>

<p>Development Plan, as a concept it can be described as 'the ability of a system, community or society exposed to hazards to resist, absorb, accommodate to and recover from the effects of a hazard in a timely and efficient manner, including through the preservation and restoration of its essential basic structures and functions' This principle can be broken down and applied for critical infrastructures such as transport networks, utilities, public places and more recently IT and supply systems. The submission outlines that the Assembly is commencing a 3 year project to prepare a European Resilience Management Guidelines to support the practical application of resilience. (DRAFTDEVPLAN0500, Malachy Bradley, Eastern and Midland Regional Assembly)</p> <p>4. Submission also requests that no development proposal be permitted where noise levels at a potentially new residential receptor would equal or exceed the onset threshold levels prescribed in the Planning Authority's Noise Action Plan (DRAFTDEVPLAN0501, Brian Wylie, Iarnród Éireann)</p>	<p>11.6.3 of the Draft Plan states that the provision of appropriate mitigation measures for existing areas adjacent to major noise sources is supported and will be considered having regard to the visual amenity and the proper planning and sustainable development of the area.</p> <p>A submission received requested the inclusion of a specific objective to support and facilitate the construction of an oil pipeline and storage terminal in the Baldonnell/ N7 area. The submission also requests the zoning of lands for EE at Moneenalion Commons at Baldonnell to accommodate the storage terminal. The Draft Plan provides in excess of 1250 ha of 'EE' zoned lands where 'Industry-Special' and 'Fuel Depot' are permitted in principle with a significant portion of such lands located in the Baldonnell/ N7 area. The Chief Executive acknowledges the potential economic benefits of the construction of infrastructure from Dublin Port to the County. The economic policies in Section 4 of the Draft Plan support enterprise and employment uses in industrial areas. It is considered that the provision of the storage terminal can be accommodated through the land use zoning objectives, the land use zoning classes and the policies and objectives in Section 4 of the Draft Plan relating to Economic Development & Tourism.</p> <p>The economic merit of strategic infrastructure from Dublin Port to the County is recognised and it is noted that a similar scheme recently received planning permission connecting Dublin Port to Dublin Airport. The Chief Executive recommends the inclusion of an objective to support the provision of strategic infrastructure.</p> <p>Recommendation It is recommended that the Draft County Development Plan be amended to include the following objective: To support the provision of strategic piped infrastructure.</p> <p><u>Resilience</u> The submission from the Regional Assembly in relation to considering the principle of resilience in the Draft Plan is noted. The National</p>
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Chapter 7 Summary of Recommended Amendments to the Draft Plan

Section	Response Issue	Recommendation
7.1.0 Water Supply & Wastewater	Water Supply & Wastewater	<p>Amend the wording of IE1 Objective 2 to as follows:</p> <p>To work in conjunction with Irish Water to facilitate the timely delivery of ongoing upgrades and the expansion of water supply and wastewater services to meet the future needs of the County and the Region</p>
	Water Supply & Wastewater	<p>Insert new objectives in Section 7.1.0:</p> <p>To support the provision of integrated and sustainable water services through effective consultation with Irish Water on the layout and design of water services in relation to the selection and planning of development areas and the preparation of Masterplans/LAPs/ SDZ Planning Schemes.</p>
	Water Supply & Wastewater	<p>Insert new objectives in Section 7.1.0:</p> <p>To support the provision of additional strategic covered storage areas for treated drinking water in the County to provide resilience and flexibility in the drinking water supply in the Greater Dublin Area</p>
	Water Supply & Wastewater	<p>Insert a new subsection into Section 11.6.1: Water Management titled:</p> <p>(vi) Water Services</p> <p>Applicants should consult with Irish Water regarding requirements regarding way leaves and buffer zones around public water utilities and any capacity issues prior to applying for planning permission – where practicable. Additionally, to facilitate the provision of integrated and sustainable water services, applicants should consult with Irish Water in relation to the layout and design of water services.</p> <p>The provision of private waste water treatment facilities, other than single house systems, will be strongly discouraged and all new developments will be required to utilise and connect to the public wastewater infrastructure, where practicable.</p>
	Water Supply & Wastewater	<p>Amend the text of Action on page 121 of the Draft Plan to refer to Water Safety Plans.</p>

SFRA	Flood Risk Assessment	It is recommended that the initial SFRA be amended to inform the preparation of the Draft Plan in conjunction with the consultants to produce a finalised Strategic Flood Risk Assessment (SFRA).
SFRA	Development Plan Preparation	It is recommended that the initial SFRA be amended to inform the preparation of the Draft Plan in conjunction with the consultants to produce a finalised Strategic Flood Risk Assessment (SFRA).
SFRA	Greenogue Industrial Estate	It is recommended that the updated SFRA, carried out in conjunction with the consultants, remove reference to investigating flood zones for undefended scenario at Greenogue Industrial Estate.
7.3.0 Flood Risk Management	Moneenalion Commons, Baldonnell	It is recommended that the Draft County Development Plan maps be amended to rezone the lands at Moneenalion Commons from EE in the Draft Plan to Rural (RU) and that IE3 SLO1 be removed from the written statement.
7.8.0 Aerodromes & Airports	Public Safety Zones at Casement	Insert the following into IE Objective 8 (a) In general, no development shall be permitted within the Public Safety Zones.
11.6.6	Public Safety Zones at Casement	Insert the following paragraph into Section 11.6.6 Aerodromes under (iii) Development Restrictions at Aerodromes Public Safety Zones Public Safety Zones are areas of land at the end of runways established to control the number of people on the ground at risk in the unlikely event of an aircraft accident on take-off or landing. These areas are delineated as a triangular shape on the Development Plan maps and in general, no development shall be permitted within these zones.

CHAPTER 8 - GREEN INFRASTRUCTURE

<p>General</p> <ol style="list-style-type: none"> 1. Include actions to support Green Infrastructure policies. (DRAFTDEVPLAN0268, Doireann NiCheallaigh, An Taisce) 	<p>Chief Executive's Response and Recommendation <u>The Plan's inclusion of Green Infrastructure Actions</u> One of the main actions of the Draft Plan 2016-2022 (p135) is to develop a Green Infrastructure Strategy for the County which will be implemented through the Development Plan and in particular through the action of Objective G1-2. The Strategy will be prepared in consultation with key stakeholders and the public during the lifetime of the Development Plan. The strategy will form the basis for the identification, protection and promotion of Green Infrastructure and provide a structure for the long term management, enhancement and expansion of the Green Infrastructure network across urban and rural areas. The strategy will include delivery and spatial frameworks, on which priorities and actions can be based.</p> <p>Recommendation It is recommended that the wording of the Action under Green Infrastructure Policy 1 of the Draft County Development Plan be amended to include the phrases 'and implement' and 'in accordance with international best practice and emerging national guidance'.</p>
<p>8.0 Introduction</p> <ol style="list-style-type: none"> 1. Recommendation to integrate the County Biodiversity Plan and Green Infrastructure Strategy, upon their adoption, in lower level plans to guide future zoning and development and protect areas of significant green infrastructure, ecological corridors and associated biodiversity. (DRAFTDEVPLAN0052, David Galvin, Environmental Protection Agency) 2. When preparing the county green infrastructure strategy it is important to take note of the EU green infrastructure strategy. (DRAFTDEVPLAN0510, Simon Dolan, Department of Arts, Heritage and the Gaeltacht) 	<p>Chief Executive's Response and Recommendation <u>Integration of County Biodiversity Plan and GI Strategy</u> It has been requested that the Biodiversity Plan and the GI Strategy be integrated with lower level plans to guide future zoning and protect area of significant green infrastructure. It is therefore recommended that the Draft County Development Plan be amended to include additional text to integrate the objectives of the Green Infrastructure Strategy throughout all relevant Council plans e.g. Local Area Plans, County Biodiversity Plan and other action plans.</p> <p>Recommendation It is recommended that the Draft County Development Plan be amended to</p>

<ol style="list-style-type: none"> 3. Requested that Objective 1 under Green Infrastructure be reworded to include additional wording and phrases to expand on details covered within the objective specifically and Chapter 8 generally. Requested that Objective 2 be merged with the Action (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open) 4. Requested that additional Objectives be added to Green Infrastructure Policy 1, in particular to retain or improve access and to require that all land use plans provide for green infrastructure. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open) 5. Requested that the wording of the Action on pg 135 be amended to include 'in accordance with international best practice and emerging national guidance', that the strategy be in place within two years of the adoption of the Plan and additional wording detailing who the key stakeholders should be and the process under which the strategy should be carried out. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open) 	<p>include additional text to integrate the objectives of the Green Infrastructure Strategy throughout all relevant Council plans e.g. Local Area Plans, County Biodiversity Plan and other action plans.</p>
<p>8.1.0 Green Infrastructure Network</p>	
<ol style="list-style-type: none"> 1. Include objective to connect parks and open spaces with ecological and recreational corridors for people and biodiversity. (DRAFTDEVPLAN0002, Paul CorcoranDRAFTDEVPLAN0003, Paul Corcoran) 2. To develop Kiltipper Park as a Native Woodland Scheme (NWS) and a NeighbourWood Scheme (NBR) to provide a biodiversity corridor between Glenasmole and Dodder Valley, Killinarden Park and Tymon Park. (DRAFTDEVPLAN0025, Gary Tyrrell) 3. Proposes that lands zoned RU located directly to the south of A1 zoned lands at Killinarden Heights be developed as a NeighbourWood Scheme. 	<p>Chief Executive's Response and Recommendation Green Infrastructure Strategy A number of suggestions were made for the inclusion of specific items within the Plan and in particular the GI Chapter such as: the creation of Tubber Lane as a secondary road route, NeighbourWood Schemes, tree nurseries, tree planting, apiary colonies, promotion of wildflowers, designation of pollinator parks trans-boundary connectivity, habitat mapping, facilitating peri-urban agriculture and horticulture; tables of rivers and lakes, riverside and lakeside walks/cycle routes and amenity areas; mapping of existing watercourses, potential/existing walkways and cycles routes and a masterplan map of existing and proposed facilities along the River Dodder. Each of these specific items will be investigated during the preparation of the GI Strategy, which will be prepared during the lifetime of the plan and the Biodiversity and Heritage Plans currently underway.</p>

<p>(DRAFTDEVPLAN0026, Gary Tyrrell, Gary Tyrrell)</p> <ol style="list-style-type: none"> 4. Request that a tree nursery be developed at Friarstown. (DRAFTDEVPLAN0026, Gary Tyrrell, Gary Tyrrell) 5. Suggestions made regarding tree planting within the County inter alia greater planting within large parks and open spaces and along road ways to mitigate noise levels and pollutants from cars. (DRAFTDEVPLAN0012, Gary Tyrrell) 6. Proposal to set up apiary colony in waterstown park. (DRAFTDEVPLAN0011, Paul Corcoran) 7. Requests the protection of flora and fauna and the preservation of habitats within the County. (DRAFTDEVPLAN0046, Louise Purcell) 8. Recommendation to investigate trans-boundary connectivity aspects, where relevant, in the preparation and implementation of the proposed Green Infrastructure Strategy. Additionally, where possible, habitat mapping should be undertaken to help inform the preparation of both the Green Infrastructure Strategy and the County Biodiversity Plan. (DRAFTDEVPLAN0052, David Galvin, Environmental Protection Agency) 9. Outlines that Tubber Lane be retained intact as a secondary road route (cycle or otherwise), both the actual route itself and the 'environment' of the route, i.e. the mature trees and hedgerows alongside - an aim given further impetus now by the recent IPI initiative to provide 'pollinator highways along transport routes' as a means of halting the decline in native insect species, a decline directly caused by the 'scorched earth' approach to road 'improvements' all too prevalent throughout Ireland to date. The Tubber Lane represents the last quiet and safe route out of the west county for cyclists and walkers, all other routes have become 	<p>In respect of the provision of connected parks / open space / recreational corridors, Policy G2 sets out that it is the policy of the Council to promote and develop a coherent, integrated and evolving Green Infrastructure network in South Dublin County that can connect to the regional network, secure and enhance biodiversity, provide readily accessible parks, open spaces and recreational facilities. Policy G2 sets out 10 objectives.</p> <p>It is considered that the policies and objectives of the Plan under Objective G2 address concerns arising in relation to the protection flora and fauna and concerns around the impact of path and cycle tracks. These matters are more appropriately addressed as part of the forthcoming County Biodiversity Plan and Green Infrastructure Strategy.</p> <p>With regard to submissions regarding general wording and layout, and merging of Objective, these submissions have been considered. In this regard, it is considered that the wording of Sections within Chapter 8 are adequate for their purpose and the merging of policies and objectives is not necessary.</p> <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Greening of infrastructural projects</u></p> <p>In response to the Department of Arts, Heritage and the Gaeltacht submission it is considered that minor amendments be made to the Draft Plan 2016-2022 to ensure clarity. In particular it is intended to make amendments to clarify that GI is about 'greening' infrastructural projects which will link with and enhance the natural networks which already exist within the County rather than adding infrastructure to green areas. In this regards it is recommended that a new objective be included in G2 to address the 'greening' of existing areas of grey infrastructure.</p>
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<p>heavily trafficked or been subsumed into dual-carriageways or other widened main roads and it is vital that it is retained intact. (DRAFTDEVPLAN0069, Colm O'Brien)</p> <p>10. Improve biodiversity and promote wildflowers for pollinators in Watertown Park and designate as a Pollinator Park on basis of decline of pollinator species, successful increase in wildflower species beside car park, existing biodiversity value of park. Suggested actions relate to park maintenance. (DRAFTDEVPLAN0074, Paul Corcoran)</p> <p>11. Request to include a masterplan map of existing and proposed facilities along the River Dodder, which formed part of a River Dodder Greenway submission, within the Development Plan Written Statement. (DRAFTDEVPLAN0178, Dublin South West Green Party)</p> <p>12. Amend Policy G2 Objective 10(paths and cycle tracks)to ensure that ecosystems and amenities are not diminished and that existing biodiversity is protected and enhanced. (DRAFTDEVPLAN0335, Victorica White, Dodder Action)</p> <p>13. Submission from the DAHG advises that the placing of new infrastructure in green areas can impact negatively on biodiversity and care should be taken to ensure that green infrastructure is not interpreted as adding infrastructure to green areas. (DRAFTDEVPLAN0510, Simon Dolan, Department of Arts, Heritage and the Gaeltacht)</p> <p>14. Submission highlights importance of peri-urban agriculture and horticulture to support local biodiversity and food security. (DRAFTDEVPLAN0405, Mr & Mrs Power)</p> <p>15. Requested that Section 8.1.0 Objective 10 be merged with proposed revised Objective 1 in 8.0 Green Infrastructure.</p>	<p>Recommendation: It is recommended that a new objective be added to G2 of the Draft County Development Plan to include: To incorporate appropriate elements of Green Infrastructure e.g. new tree planting, grass verges, planters <i>etc.</i> into existing areas of hard infrastructure wherever possible, thereby integrating these areas of existing urban environment into the overall Green Infrastructure network.</p>
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(DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)	
8.2.0 Watercourse Network	
<ol style="list-style-type: none"> 1. Recommendation to include a specific objective relating to the control and management of invasive species in South Dublin, as identified along the River Dodder in SEA ER in Section 3.3.8 Biodiversity: Existing Problems. (DRAFTDEVPLAN0052, David Galvin, Environmental Protection Agency) 2. Map existing watercourses, potential/existing walkways and cycle routes along watercourses and associated activities. Require development proposals adjacent to water courses to integrate into the surrounding landscape, be site specific and avoid impact on water quality. (DRAFTDEVPLAN0212, Doireann Ni Cheallaigh, An Taisce) 3. Submission notes need to include reference to invasive species in policies and objectives pertaining to watercourse networks in the County. (DRAFTDEVPLAN0383, Angela O'Donoghue, Glendoher & District Residents Association DRAFTDEVPLAN0384, Angela O'Donoghue, Rathfarnham Area Residents Association) 4. Include objective under G policy 3 to protect, maintain and improve the natural character of watercourses and promote access, routes and recreational uses subject to nature conservation and flood protection. (DRAFTDEVPLAN0335, Victorica White, Dodder Action) 5. Policy G3 Objective 3 (floodplains) seems to conflict with the zoning of lands for development in an areas prone to flooding in Baldonnell. Flood plains should be left undeveloped to allow for protection of these valuable habitats and provide areas for water retention. (DRAFTDEVPLAN0510, Simon Dolan, Department of Arts, Heritage 	<p>Chief Executive's Response and Recommendation</p> <p><u>Invasive Species</u> A number of submissions were received, one from the EPA, which sought the inclusion of an objective to manage and control the spread of invasive species. It is recommended that objectives be inserted into Section 8.1.0 Green Infrastructure Network of the plan.</p> <p>Recommendation It is recommended that additional objectives be added to Policy G2 of the Draft County Development Plan as follows:</p> <ul style="list-style-type: none"> ▪ To seek to control and manage non-native invasive species and to develop strategies with relevant stakeholders to assist in the control of these species throughout the County. ▪ The Council will endeavour to prevent the loss of woodlands, hedgerows, aquatic habitats and wetlands wherever possible including requiring a programme to monitor and restrict the spread of invasive species such as those located along the River Dodder. <p><u>Mapping of watercourses</u> With regard to mapping of watercourses please refer to Green Infrastructure Strategy response under Section 8.1.0 above.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Definition of Green Infrastructure</u> In respect to the definition of Green Infrastructure, it is considered that the wording in Section 8.0 of the Draft Plan 2016-2022 adequately describes its purpose and function.</p>

<p>and the Gaeltacht)</p> <ol style="list-style-type: none"> 6. Submission notes objection to 10 metre biodiversity protection zone on the top bank of all watercourses on the basis that it is excessive and not required to protect plant and wildlife, and would exclude the enjoyment of the watercourses by humans. Submission requests a reduction of protection zone to 4 metres. (DRAFTDEVPLAN0261, Gerard Stockil, Tallaght Community Council) 7. Requested that the 2nd paragraph in Section 8.2 be reworded to include a more detailed explanation of GI and specific European and Irish Documents. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open) 8. Suggested amendment to Section 8.2 Objective 2 as follows: In 1st sentence, insert after County, minimum of 30m from each riverbank outside urban centres on main rivers (named). (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open) 9. Requested that Objective G3-4 be reworded to include additional wording and phrases, which would expand on details covered within the Objective and the Green Infrastructure Chapter in general. In particular, requested that development be prohibited alongside watercourses, that the watercourses remain open and gives guidance on how development should be assessed when proposed alongside a watercourse. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open) 10. Requested that additional objectives be added to Section 8.2.0 to include the improvement of public access (public rights of way, where appropriate) to the County's waterbodies and courses; to provide amenities at these locations; to encourage linkages with adjoining counties and the GDA region; to require management plans for particular areas to address compatibility with the GI network (sets out how this compatibility can be met); the 	<p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Additional text and objectives</u> With regard to requests in relation to additional text and objectives within Chapter 8, it is considered that the text objectives in Section 8.2.0 are adequate for their purpose and no further additions are required.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Buffer Zone along watercourses network</u> Submissions have been received which seek to both increase the extent of the 10 metre buffer zone along the County's watercourses network and also to decrease it. The submission from the Department of Arts, Heritage and the Gaeltacht notes that otter habitat extends to 10m from the river and that this species is protected under the European Habitats Directive and the Wildlife Act; the Department's submission also notes the Inland Fisheries guidelines "Planning for watercourses in the urban environment", which recommends a buffer of 15m from rivers to facilitate flood alleviation and biodiversity protection.</p> <p>It is an objective of the Draft Plan to maintain a biodiversity protection zone of not less than 10 metres from the top of the bank of all watercourses in the County. The direct access to water, referenced in a number of submissions received, would likely result in the need for hard engineered solutions and remove the protection of the many interconnected watercourses throughout the County, which in the past have been culverted or hard landscaped. Conversely, the protection and enhancement of the County's watercourses can produce an array of benefits which would be more suited to the health and well-being of those living and visiting the County.</p>
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consultation with specific stakeholders, including the community; to preserve a strip of 10m wide along the banks of large drainage channels and 5m wide elsewhere; to protect the amenity value of the Grand Canal corridor by managing development along it and that flood protection/alleviation works take place.

([DRAFTDEVPLAN0498](#), [Roger Garland](#), [Keep Ireland Open](#))

11. Requested that additional text be added to Section 8.2.0 Watercourses Network to give more detail on watercourses in general and suggested how the Plan should provide for human access to these and that the Plan should include tables of: the main rivers, the main lake, existing or potential riverside and lakeside walks/cycle routes and main lakeside and riverside amenity areas. Suggests clarity on riparian(river) buffer zones a strips of vegetated land bordering on a river or stream and used to protect watercourses from the impact of development.

([DRAFTDEVPLAN0498](#), [Roger Garland](#), [Keep Ireland Open](#))

The 10m buffer zone has been recommended in the Draft Plan as the minimum setback from the river, most notably to protect the integrity of the river banks, securing them against erosion and wash away whilst accommodating increased water flow and protecting against possible flooding downstream, which in turn may help to limit the need for costly engineered solutions paid for by the Council in the future. Furthermore, the banks of the County's watercourses provide important habitat for wildlife which together form the delicate flora and fauna network which helps to support industries, such as farming, through the encouragement of pollination, and tourism through providing quality environments and species to observe. The 10m minimum buffer zone recommended in the Draft Plan will contribute to the provision of clean air within the County through the absorption of CO2 by trees. The required 10 metre minimum strip, with the flexibility of determining its extent on a case by case basis, is considered sufficient to ensure that humans benefit from the gains offered by the biodiversity protection zone.

A number of submissions requested that increased access be promoted alongside the County's watercourses for walking/cycling routes and other recreational. The Draft Plan makes provision for specific cases of human intervention (most notably within Objective G3-2) but it considered that the opening up of all the County's watercourses for human access would be contrary to the ethos behind Green Infrastructure which is about promoting the 'greening of infrastructure' rather than placing infrastructure within green areas. Furthermore the proposal would be contrary to other objectives included under Policy 3 Watercourses Network.

Recommendation

It is not recommended that the Draft County Development Plan be amended.

Zoning at Baldonnell contrary to Policy G3 Objective 3

The Chief Executive acknowledges and agrees with the submission outlining that flood plains should be left undeveloped to allow for protection of these valuable habitats and provide areas for water retention. Objective

	<p>G3-3 seeks to build resilience to climate change through the protection, improvement or restoration of riverine floodplains and the promotion of strategic measures to accommodate flooding at appropriate locations within the County.</p> <p>The site specific issue at Baldonnell is detailed under the Infrastructure and Environmental Quality (IE) responses in Section 7 of this report.</p>
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Chapter 8 Summary of Recommended Amendments to the Draft Plan

Section	Response Issue	Recommendation
General	General	It is recommended that the wording of the Action under Green Infrastructure Policy 1 be amended to include the phrases 'and implement' and 'in accordance with international best practice and emerging national guidance'.
8.0 Introduction	General	It is recommended that the Draft County Development Plan be amended to include additional text to integrate the objectives of the Green Infrastructure Strategy throughout all relevant Council plans e.g. Local Area Plans, County Biodiversity Plan and other action plans.
8.1.0 Green Infrastructure Network	Greening of infrastructural projects	It is recommended that a new objective be added to include: To incorporate appropriate elements of Green Infrastructure e.g. new tree planting, grass verges, planters <i>etc.</i> into existing areas of hard infrastructure wherever possible, thereby integrating these areas of existing urban environment into the overall Green Infrastructure network.
8.2.0 Watercourses	Invasive Species	It is recommended that additional objectives be added to Policy G2 of the Draft County Development Plan as follows: <ul style="list-style-type: none"> ▪ To seek to control and manage non-native invasive species and to develop strategies with relevant stakeholders to assist in the control of these species throughout the County. ▪ The Council will endeavour to prevent the loss of woodlands, hedgerows, aquatic habitats and wetlands wherever possible including requiring a programme to monitor and restrict the spread of invasive species such as those located along the River Dodder.

CHAPTER 9 - HERITAGE, CONSERVATION & LANDSCAPES

General	
<p>1. Submitted that additional sub sections be included to Chapter 9 as follows:</p> <p>A. ESKERS</p> <ul style="list-style-type: none"> - Recognise the importance of esker landscape and its archaeological and historic value and include a presumption against new quarry development. - Recognises that the exploitation of deposits can have seriously damaging environmental impact on the esker network. - List and map Eskers. - Include objectives to increase cycling and pedestrian access; protect geo-diversity value, ensure adequate assessment of plans and projects with regard to environmental impact, landscape impact and amenity value of eskers; conserve them free from inappropriate development. <p>B WOODLANDS:</p> <p>Include policy to enter into negotiations with the Forest Service to take over the management and/or ownership of Massy Woods.</p> <p>C PEATLANDS:</p> <p>Include objective that:</p> <ul style="list-style-type: none"> - Recognise that boglands are important natural, amenity, heritage, tourism resource, ecological archaeological resources. - Protect the character, appearance and quality of boglands and conserve them free from inappropriate development. - Ensure that peatland areas designated under international and national legislation are conserved and managed. <p>D BOHERNABREENA RESERVOIRS: Investigate the feasibility of protecting the natural and recreational amenities in partnership with Dublin City Council and Irish Water.</p> <p>E WICKLOW MOUNTAINS NATIONAL PARK: Include and objective promoting the extension of the Wicklow Mountains National Park and to cooperate with relevant bodies.</p> <p>(DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p>	<p>Chief Executive's Response and Recommendations</p> <p><u>Eskers</u></p> <p>The Geological Heritage of South Dublin County: An Audit of County Geological Sites in South Dublin 2014 accompanies the Draft Plan 2016-2022, and was used to identify County Geological Sites. The Audit identifies 2 geological sites of interest in the County that comprise Eskers (Greenhills Esker, Lucan Esker and the N4 Lucan Cutting).</p> <p>Both the Greenhills and Lucan Eskers are located across lands that are zoned Objective 'OS' (to preserve and provide for open space and recreational amenities) within public parks thus protecting them from inappropriate development and affording good cyclist and pedestrian access.</p> <p>The Greenhills and Lucan Eskers have also been identified and mapped as County Geological sites under the Draft Plan. It is the policy of the Council under HCL Policy 19 (Geological Sites) to maintain the conservation value and seek the sustainable management of such heritage resource. HCL 19 Objective 1 also provides for the protection of designated Geological Sites from inappropriate development. It is therefore not considered necessary to seek to amend the Draft Plan in relation to this issue.</p> <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Woodlands and Peatlands</u></p> <p>The taking control of privately owned woodlands is beyond the strategic land use and planning remit of a County Development Plan and cannot be achieved or actioned through same.</p>

	<p>The majority of boglands and peatlands within the County are located on lands that are zoned High Amenity (HA-DM) above the 350 metre contour under the Draft Plan 2016-2022 . Most of these lands are also located within the Wicklow Mountains Special Area of Conservation. The zoning and European site designation of the County's boglands will ensure that development in these areas is carefully managed in the interest of protecting their natural heritage and visual amenity. HCL 9 Objective 2 of the Draft Plan seeks to ensure that development above the 350 metre contour in the Dublin Mountains will seek to protect the open natural character of mountain heath, gorselands and mountain bogs.</p> <p>The identification of sites under National or EU habitat designations is a function of by the Department of Arts, Heritage and the Gaeltacht and is beyond the remit of the County Development Plan. It is therefore not considered necessary or appropriate to seek to amend the Draft Plan in relation to this issue.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Wicklow Mountains National Park and Bohernabreena Reservoirs</u> The Bohernabreena Reservoirs and lands within and adjacent to the Wicklow Mountains National Park are zoned High Amenity (HA-DM) under the Draft Plan 2016-2022. This zoning will ensure that development in these areas of the County is carefully managed in the interest of protecting their natural heritage, recreational amenity and visual amenity.</p> <p>Furthermore, H23 Objective 2 and IE2 Objective 7 seeks to generally prohibit development within restricted areas identified on the Bohernabreena/Glenasmole Reservoir Restricted Areas Map contained in Schedule 4 of the Draft Plan. HCL 9 Objective 3 also seeks to ensure that development within the Dublin Mountains will not prejudice the future creation and development of a National Park. It is also noted that the South Dublin Tourism Strategy 2015 makes provision for the development of the</p>
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	<p>Dublin Mountains Park, including Montpelier Hill, as a Flagship Project.</p> <p>These objectives are further supported by Actions contained in the Draft Plan, which seek to:</p> <ul style="list-style-type: none"> ▪ Support and co-operate with the protection of the Wicklow Mountains National Park that adjoins the County at Glenasmole and Kippure and extends into Glendoo (HCL Policy 9). ▪ Co-operate with key stakeholders including Coillte and Irish Water and other appropriate agencies in identifying and promoting the tourism assets of and supporting the development of tourism infrastructure in a sustainable manner in the County (ET Policy 8). <p>It is not, therefore, considered necessary or appropriate to amend the Draft Plan in relation to these issues.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
9.0 Introduction	
<p>1. Submitted that an additional paragraph be inserted under 9.0 that recognises the County's rich and diverse heritage including features and landscapes and the benefits of protecting such. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p>	<p>Chief Executive's Response and Recommendations The introduction to Chapter 9 recognises the County's rich and diverse heritage including features and landscapes. It is accepted that the introduction could be amended to acknowledge the benefits of protecting the heritage and landscapes of the County.</p> <p>Recommendation It is recommended that the text in the introduction Chapter 9 of the Draft County Development Plan be amended to acknowledge the benefits of protecting the heritage and landscapes of the County.</p>
9.1.0 Built Heritage and Architectural Conservation	
<p>1. Make connection with Fingal County and between Phoenix Park and Waterstown Park via Metal Bridge. (DRAFTDEVPLAN0002, Paul CorcoranDRAFTDEVPLAN0003, Paul Corcoran DRAFTDEVPLAN0005, Paul Corcoran, DIT, Paul</p>	<p>Chief Executive's Response and Recommendations The Chief Executive has carefully considered the issues raised in relation to the built heritage and architectural conservation. Responses and recommendations are provided under the following headings</p>

<p>Corcoran DRAFTDEVPLAN0001, Paul Corcoran)</p> <ol style="list-style-type: none"> Submission requests improved connection within Fingal County Council by rebuilding the silver bridge. (DRAFTDEVPLAN0005, Paul Corcoran, DIT, Paul Corcoran) More details in relation to the restoration of the Silver Bridge in Palmerstown should be inserted into the County Development Plan including survey work. The bridge is of significant heritage value and has potential community, tourism, amenity and permeability/movement value. (DRAFTDEVPLAN0077, Paul Corcoran, Rebuild the Silver Bridge) Submission outlines the content of Objective 5'To protect historical burial grounds within South Dublin County and encourage their maintenance in accordance with conservation principles' and requests that it be broadened to include public access to burial grounds where possible. The submission outlines the old St Mary's Cemetery in Lucan Village as an example. (DRAFTDEVPLAN0144, Kevin O'Loughlin) Requests that the Old Schoolmaster's House in Lucan Village be investigated for potential purchase by SDCC for development as a local heritage centre. (DRAFTDEVPLAN0144, Kevin O'Loughlin) Requests that St Finian's Church Esker (burial site of Fr James McCartan murdered on Chapel Hill in 1807) should be specifically listed for preservation/improvement. The so-called 'oldest bridge in Ireland/ King John's Bridge is in poor repair and similarly requires remediation. (DRAFTDEVPLAN0144, Kevin O'Loughlin) Request priority for The Old Church and Graveyard Mill Lane Palmerstown as there is tremendous historical value and could be a major area for tourism. Request priority for the old metal bridge over 	<ul style="list-style-type: none"> Ownership and Restoration of Historic Structures Access to Historic Sites Preservation of Archaeological Heritage Details and Provisions for Archaeological Heritage Silver Bridge/Metal Bridge Esker Church and King John's Bridge Mill Lane ACA and Protected Structures Rathcoole ACA Cottages – Ballymount and Fox and Geese St Patricks Cottages Strategic Environmental Assessment and Appropriate Assessment <p><u>Ownership and Restoration of Historic Structures</u> The identification, funding and carrying out of works to historic structures or acquisition of such structures is beyond the strategic land use, budgetary and planning functions of the County Development Plan including the ceding of sites to the Local Authority.</p> <p>'Whitehall' is listed as a Protected Structure in the Draft Plan 2016-2022 under Reference Number 197. The house is in private ownership and it is beyond the strategic land use function of a County Development Plan to acquire privately owned structures, direct its development as a tourist facility or provide access to the site. A similar request was put forward under Motion No. 307 of the June 2015 County Development Plan Meeting and it was accepted by Council to withdraw the Motion.</p> <p>Investigation into the identification and funding of heritage and tourism centres on prescribed sites cannot be achieved through the County Development Plan and should be directed to the South Dublin Tourism Strategy or Heritage Plan. The identification of a specific building for restoration and use as a heritage centre in the absence of the appropriate survey work and study is also considered to be overly prescriptive and premature.</p> <p>The Planning and Development Act 2000 (as amended) places an onus on owners and occupiers of a Protected Structure to ensure that Protected</p>
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<p>the Liffey to Strawberry Beds which links Palmerstown to Farmleigh which needs to be protected and preserved and requires examination as to what works are needed to make it safe. (DRAFTDEVPLAN0145, Joe Harrington)</p> <p>8. The Development Plan should strive to protect the more than one century old agricultural cottages in the Knockmitten, Fox and Geese and Ballymount area to ensure a sustainable mix of development, build strong communities and contribute to the heritage and character of the area. (DRAFTDEVPLAN0220, Paul Hand)</p> <p>9. Request consideration that the proposed ACA at St Patricks Cottages, Rathfarnham, would not restrict exterior home improvements (including security and energy upgrades) of Tara Hill residential properties which are located adjacent to St Patricks Cottages. (DRAFTDEVPLAN0216, Cllr Paula Donovan)</p> <p>10. Submission on behalf of Roadstone Limited submits that the presumption in favour of in-situ preservation of archaeological heritage is inflexible. It is requested that Section HCL2 Objective 1 and 11.5.1 be amended to state that preservation by record may be acceptable where preservation in-situ is not possible or feasible. (DRAFTDEVPLAN0151, Aoife Byrne, SLR Consulting, Roadstone Limited)</p> <p>11. Insert additional objective that requires development proposals in the vicinity or within built heritage sites to comply with AA and SEA requirements. (DRAFTDEVPLAN0212, Doireann Ni Cheallaigh, An Taisce)</p> <p>12. Submission supports HCL 4 SLO 1 (Palmerstown Lower Mill Complex ACA) and recommends that it be amended to include for the promotion of the restoration of industrial heritage and mill structures such as mill races etc. and to expand the exploration of</p>	<p>Structures are not endangered through harm, decay or damage through neglect or through direct or indirect means. This is supported by HCL 3 Objectives 3 and 4 of the Draft Plan, which seek to address dereliction and encourage the rehabilitation, renovation, appropriate use and re-use of Protected Structures.</p> <p>Under Section 59 of the Planning and Development Act, 2000 (as amended), Planning Authorities can serve notice to require works to be carried out in relation to endangerment of protected structures. The service of such notice is carried out under a process that is separate to the functions of a County Development Plan Review.</p> <p>It is therefore not considered necessary or appropriate to amend the Draft Plan in this regard.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Access to Historic Sites</u> The unilateral creation of access onto and through privately owned lands including those that contain Protected Structures and Recorded Monuments including burial grounds is beyond the function scope of a County Development Plan.</p> <p>Within this context, HCL 16 Objective 4 of the Draft Plan 2016-2022 seeks to promote and improve access, in partnership with the relevant landowners, to all the historic sites in the County and seek to maximise their tourism potential in partnership with the relevant landowners. The partnership approach towards achieving access is considered to be a more realisable objective and it is not considered necessary or appropriate to amend the Draft Plan in this regard.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be</p>
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<p>uses under the SLO to specifically consider tourism/outdoor recreation uses. (DRAFTDEVPLAN0175, Shane Cronin, PD Adventure Sports Limited)</p> <p>13. Submission requests that the village of Rathcoole be maintained and protected, including in relation to the existing village fabric and vernacular buildings, and the impact of new development on same. Submission also requests that Rathcoole be designated as an Architectural Conservation Area on the basis that the village reflects the heritage of the County and a vernacular Irish village that is currently being eroded. (DRAFTDEVPLAN0170, Neville Graver, Rathcoole Community Council Limited)</p> <p>14. Submission also requests extension of Tallaght ACA to include St Mary's school house, the TJ Burns cottages Balrothery to the east, and Goose Park and TJ Burns cottages on the Oldbawn Road to the south. (DRAFTDEVPLAN0261, Gerard Stockil, Tallaght Community Council)</p> <p>15. Requested that Section 9.1.1 (Archaeological Heritage) be amended to refer to protection of archaeological heritage from damage or interference and include additional information in relation to the principles of archaeology; the DoAHG publication 'Framework and Principles for the Protection of Archaeological Heritage'(1999); archaeological heritage comprising known and as yet unidentified sites; categories of monuments under the National Monuments Acts; requirements for written consent from the Minister of AHG and the issuing preservation orders; recognition of the economic importance of archaeology; the existence of areas of high archaeological potential outside the boundaries of recognised monuments; the significance of battlefield sites in terms of archaeological and economic potential; the significance of Burial Grounds; reference that sites in the RMP are generally no longer</p>	<p>amended.</p> <p><u>Preservation of Archaeological Heritage</u> HCL Objective 1 and Section 11.5.1 (Archaeological Heritage) of the Draft Plan 2016-2022 has been framed within the context of the national policy on the protection of archaeological heritage set out under Framework and Principles for the Protection of Archaeological Heritage 1999.</p> <p>The main thrust of national policy is a presumption in favour of avoiding developmental impacts on archaeological heritage and preservation in-situ of archaeological sites and monuments. It is stated that proposals to preserve archaeological sites and monuments (or portions of such) by record as opposed to preservation in-situ shall only permissible where it is robustly demonstrated that the proposed development:</p> <ul style="list-style-type: none"> ▪ cannot be re-located; and ▪ cannot be re-designed to avoid removal of the site or monument (or portions of such); and ▪ is really necessary. <p>This is reflected by HCL Objective 1 and Section 11.5.1, which favours the preservation in-situ of all sites, monuments and features of significant historical or archaeological interest in accordance with the national policy. The Draft Plan does not seek to preclude the removal and recording of archaeological heritage but seeks a more considered and appropriate response to the preservation of sites, monuments and features of significant interest while allowing flexibility in accordance with the aforementioned National Policy.</p> <p>Amending the County Development Plan to indicate a presumption in favour of the removal and recording of archaeological heritage by reason of possibility or feasibility only would be at variance with the National Policy requirement to ascertain whether such removal is really necessary.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be</p>
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<p>active; tables that include details of National Monuments and Places, graveyards, preservation orders, zones of archaeological potential, areas of special archaeological Interest and battlefield sites. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p> <p>16. Requested that HCL Policy 2 Objective 2, 3 and 5 be merged and replaced and augmented with objectives that:</p> <ul style="list-style-type: none"> - Ensure protection of archaeological heritage (in-situ or by record) including the settings of National/Recorded Monuments or newly-discovered archaeological sites and/or sub-surface archaeological remains, known and unknown archaeological areas, sites in the public ownership or guardianship, structures and features that are subject to Preservation Orders. - Ensure that development is sensitively sited and designed appropriately and impose conditions on development to protect sites of archaeological potential. - Ensure that land uses do not give rise to significant losses of archaeological materials and require all planning applications for new development within areas of archaeological potential and within close proximity of recorded monuments to take account of archaeological heritage of the area. - Prohibits developments that would injure or affect the settings and character of sites or would be seriously injurious to their cultural value. - Protect and safeguard historic landscapes and views to and from archaeological monuments. - Require applicants to demonstrate cognisance of heritage resource of the landscape. - Ensure that full consideration is given to the protection of archaeological heritage when authorising development. - Ensure that provision is made for the protection of previously unknown archaeological sites and features. - Provide public access to historic graveyards and burial grounds and promote the maintenance, management and conservation of these graveyards. - Prohibit extensions to archaeologically significant medieval burial 	<p>amended.</p> <p><u>Details and Provisions for Archaeological Heritage</u> Further to the suggested inclusion of further details in relation to archaeological heritage in the Draft Plan it is advised that the Framework and Principles for the Protection of Archaeological Heritage 1999, and the National Monuments Act have already been utilised to inform the policies, objectives and standards of the Draft Plan 2016-2022. This includes HCL Policy 2 Objectives 2, 3 and 5, and it is not considered necessary to amend these objectives particularly in relation to issues that are not relevant to the management of development in the County from strategic land use perspective or would undermine or pre-empt the development management process including consultation and assessment in a manner that would make it inflexible.</p> <p>Section 9.1.1 also indicates that archaeological heritage comprises yet to be discovered structures, features, objects or sites. The acknowledgement and protection of burial grounds is already provided for under HCL 2 Objective 5 of the Draft Plan. Further background data on built heritage within the County is also available in the Pre-Draft Public Consultation Background Issues Papers (SDCC, September 2014). ET Policy 8 and ET 8 Objective 1 already promotes heritage sites as a tourism resource. Section 11.5.1 (Archaeological Heritage) already includes a requirement for Archaeological Impact Assessments, Method Statements and Conservation Plans to support development proposals that have the potential to impact on archaeological features, sites or monuments.</p> <p>In the interest of avoiding repetition and needlessly adding to the volume and complexity of the Draft Plan, which is a strategic land use document, it is not considered appropriate or necessary to repeat the contents of the national policy or legislation, the existing Draft Plan or the Pre-Draft Issues Papers.</p> <p>It is accepted that Section 9.1.1 of the Draft Plan should be amended to acknowledge The Framework and Principles for the Protection of</p>
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<p>grounds where it would risk to archaeological heritage.</p> <ul style="list-style-type: none"> - Protect existing public rights of way to archaeological sites and designate traditional walking routes as public rights of way. - Protect the conservation of Archaeological Landscapes and seek to designate such areas within two years as part of an updated Landscape Character Assessment. - Promote historic and archaeological heritage as a tourism resource. - Require Archaeological Impact Assessment and Method Statement to establish the extent and buffer zone of archaeological material associated with the monument or site and identify the likely impact of development on both upstanding and buried structures and any archaeological significance. - Ensure that the area of the monument and buffer is not be included as part of the open space requirement of a specific development. - Requires a conservation plan for monuments located within open space. - Requires a monument or site incorporated into a development to be ceded to Local Authority. - Requires an archaeological assessment for any proposed new development which may impact on archaeological heritage for sites not yet included in the RMP and for all such assessments to be submitted to the relevant authorities and bodies before commencing work. - Require the consideration of archaeological concerns for proposed public service schemes/infrastructure located in or close to Recorded Monuments and Places, known archaeological monuments and zones of archaeological potential. - Require the preparation of an archaeological field evaluation where it proposed to undertake ground works within an area of archaeological potential. - Require assessment of development against the Archaeological & Development Guidelines for Good practice for Developers and the DoECLG/ICF Archaeological Code of Practice (2009). - Require suspension of works where it is deemed that a 	<p>Archaeological Heritage 1999, as the national policy document on the protection of archaeological heritage. It should also be stated that the boundary defining Zones/Areas of Archaeological Potential for the Recorded Monuments listed and mapped in the County Development Plan does not necessarily define the full extent of the site or monument and that certain monuments on the Record of Monuments and Places (RMP) that have been deemed to be of national importance or are within the ownership of the State are also designated as National Monuments. HCL 2 Objective 4 should also be amended to include for the protection of any of any discovered battlefield sites of significant archaeological potential within the County.</p> <p>The text of Chapter 9 introduction (Section 9.0) should be amended to acknowledge the benefits of protecting the heritage and landscapes of the County including Archaeological Heritage.</p> <p>Section 11.5.1 of the Draft Plan should also be amended to:</p> <ul style="list-style-type: none"> ▪ Require new buildings within an Area/Zone of Archaeological Potential to be designed to have minimal impact on archaeological features; ▪ Have regard to archaeological concerns when considering proposed infrastructure and roadworks located in close proximity to Recorded Monuments and Places; ▪ Require archaeological testing to be carried out as part of an archaeological assessment where it's deemed that a proposed development may have an impact on an archaeological site or monument ▪ Require archaeological monitoring to be carried out during the course of development works where it is considered necessary to identify and protect potential archaeological deposits, features or objects. ▪ Require full archaeological excavation where it is recommended by the National Monuments Service or any superseding body. ▪ Have regard to Emerging Historic Landscape Character Assessments contained within the Landscape Character Assessment of South Dublin County 2015 when assessing
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<p>development would result in ground disturbance that threatens archaeological heritage until direction is given by the DoAHG.</p> <ul style="list-style-type: none"> - Require developers to consult with the Council at the earliest possible stage prior to development works in areas of archaeological interest. - Require pre-development testing in cases where permitted works will impinge on known archaeological sites and monuments. - Require cognisance to be taken of the 'Code of Practice between ESB National Grid and the Minister for the Environment in relation to Archaeological Heritage. - Have regard to Historic Landscape Character Assessments in assessing planning applications. - Encourage and promote management and maintenance of archaeological heritage in accordance with conservation principles and best practice guidelines. - Have regard to the National Monuments(Amendment) Act, 1994 or as may be amended when considering development proposals within areas of Archaeological Potential. - Require applicants to include an assessment of the likely archaeological potential within areas of Special Archaeological interest. - Protect battlefield sites and their settings and refer planning applications to the NMS of the DoAHG. - Recognise the importance of archaeology and National Monuments as part of our heritage. <p>(DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p> <p>17. It is requested that objectives under HCL policy 2 be augmented, amended and replaced to provide for:</p> <ul style="list-style-type: none"> - The protection and management of natural, built and cultural heritage features (existing and proposed European and National sites designated in particular); - Resistance to development that impacts negatively on such features; - Implementation of the aims, objectives and actions contained in the County Heritage Plan; 	<p>applications.</p> <p>Recommendation</p> <p>It is recommended that Draft County Development Plan be amended as follows:</p> <ul style="list-style-type: none"> ▪ Amend Section 9.1.1 of the Draft Plan to acknowledge “The Framework and Principles for the Protection of Archaeological Heritage” (1999) as the national policy document on the protection of archaeological heritage. ▪ Amend the introduction of Chapter 9 of the Draft Plan to acknowledge the benefits of protecting the heritage and landscapes of the County including Archaeological Heritage. ▪ It should also be stated that the boundary defining Zones/Areas of Archaeological Potential for the Recorded Monuments listed and mapped in the County Development Plan does not necessarily define the full extent of the site or monument and that certain monuments on the RMP that have been deemed to be of national importance or are within the ownership of the state are also designated as National Monuments. ▪ Amend HCL 2 Objective 4 of the Draft Plan to include for the protection of any discovered battlefield sites of significant archaeological potential within the County. ▪ Amend Section 11.5.1 of the Draft Plan to: <ul style="list-style-type: none"> ○ Require new buildings within an Area/Zone of Archaeological Potential to be designed to have minimal impact on archaeological features; ○ Have regard to archaeological concerns when considering proposed infrastructure and roadworks located in close proximity to Recorded Monuments and Places; ○ Require archaeological testing to be carried out as part of an archaeological assessment where it's deemed that a proposed development may have an impact on an archaeological site or monument ○ Require archaeological monitoring to be carried out during the course of development works where it is considered necessary to identify and protect potential archaeological
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<ul style="list-style-type: none"> - Recognition of the role played by natural amenities and landscape as part of our heritage and as a major resource including mountains, commonage and other hill land, moorlands, forests, rivers, lakes, valleys, 2000 Natura sites, nature reserves and other natural amenities; - Consideration of appropriate rural recreational and tourism related developments which would facilitate public access to sensitive landscapes; - Consultation with the appropriate statutory authority and Appropriate Assessment in relation to development proposals in the vicinity of designated sites; - Review of the current Heritage Plan prior to expiry; - Continued employment of a Heritage Officer. <p>(DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p> <p>18. Submission requests inclusion of an SLO to provide public access to 'Whitehall, Kathrine Tynans house and farm', as a tourist facility. (DRAFTDEVPLAN0261, Gerard Stockil, Tallaght Community Council)</p>	<p>deposits, features or objects.</p> <ul style="list-style-type: none"> o Require full archaeological excavation where it is recommended by the National Monuments Service or any superseding body. o Have regard to Emerging Historic Landscape Character Assessments contained within the Landscape Character Assessment of South Dublin County 2015 when assessing relevant planning applications. <p><u>Silver Bridge/Metal Bridge</u></p> <p>The Metal Bridge over River Liffey in Palmerstown is listed as a Protected Structure under the Draft Plan 2016-2022 under RPS Ref. 006. This statutory designation under the Planning and Development Act 2000 (as amended) seeks to ensure that the Metal Bridge is not endangered through harm, decay or damage through neglect or through direct or indirect means. This is strengthened by HCL 3 Objective 3 of the Draft Plan, which addresses the issue of dereliction of Protected Structure and encourages their rehabilitation, renovation, appropriate use and re-use.</p> <p>Furthermore, HCL 3 SLO 1 specifically supports the refurbishment of the Metal Bridge. Such refurbishment will provide for improved connection across the Liffey towards Phoenix Park. This is further advocated by HCL 10 Objective 4, which seeks to support the development of the Liffey Valley (Zoning Objective 'HA-LV') as an interconnected greenway and park in collaboration with (inter alia) Fingal County Council to include for pedestrian routes and footbridge locations.</p> <p>In terms of the carrying out of restorative works to the Metal Bridge, the structure is in the ownership of Fingal County Council who have engaged a Conservation Engineer to provide a work programme for the necessary conservation and repair works to the bridge. A full survey of the bridge and a report detailing the essential repairs and works required to allow the re-use of the bridge was provided.</p> <p>The inclusion of details in relation to surveys and proposed works to any of</p>
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	<p>the 426 Protected Structure within the County including the Metal Bridge is beyond the strategic land use and planning function and scope of the County Development Plan. The repetition of such information would also significantly add to the volume and complexity of this strategic countywide document. It is therefore not considered necessary or appropriate to amend the Draft Plan in relation to this issue.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Esker Church and King John's Bridge</u> Esker Church and King John's Bridge in Lucan are both listed as a Protected Structure under the Draft Plan 2016-2022 (RPS Ref. 100 and 103). This statutory designation under the Planning and Development Act 2000 (as amended) seeks to ensure that these structures are not endangered through harm, decay or damage through neglect or through direct or indirect means. This is strengthened by HCL 3 Objective 3 of the Draft Plan, which addresses the issue of dereliction of Protected Structures and encourages their rehabilitation, renovation, appropriate use and re-use. King John's Bridge is within the ownership of South Dublin County Council and has been identified for appraisal in relation to its condition and possible restorative works.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Mill Lane ACA and Protected Structures</u> The Stone Church (Ruin) and Graveyard (Recorded monument) located off Mill lane is listed as a Protected Structure under the Draft Plan 2016-2022 (RPS Ref. 039). This statutory designation under the Planning and Development Act 2000 (as amended) seeks to ensure that the Protected Structure is not endangered through harm, decay or damage through</p>
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	<p>neglect or through direct or indirect means. This is strengthened by HCL 3 Objective 3 of the Draft Plan, which addresses the issue of dereliction of Protected Structure and encourages their rehabilitation, renovation, appropriate use and re-use.</p> <p>The Protected Structure is also designated within the Palmerstown Lower - Mill Complex. HCL 4 Objective 3 seeks to address dereliction and promote appropriate and sensitive reuse and rehabilitation of buildings, building features and sites within Architectural Conservation Areas. HCL 4 SLO 1 specifically seeks to secure the preservation and enhancement of the Palmerstown Lower (Mill Complex) ACA, to actively promote the restoration buildings on Mill Lane and to explore their use for residential and/or commercial purposes.</p> <p>Phase 1 of conservation works on the Church and Graveyard comprising works to stone boundary walls have begun under the Council's budget for protected structures. Phase 2 of the conservation works will involve structural works to the church and will follow the Phase 1 works.</p> <p>No further objectives are actionable in relation to Stone Church (Ruin) and Graveyard (Recorded monument) through the Draft Plan, which comprises a strategic land use document for the County.</p> <p>In line with the submission that supports HCL 4 SLO 1 (Palmerstown Lower Mill Complex ACA), it is recommended that the SLO be amended to include for the promotion of the restoration of industrial heritage and mill structures including mill races and to expand the exploration of uses under the SLO to include tourism/outdoor recreation uses.</p> <p>Recommendation</p> <p>It is recommended that HCL4 SLO1 (Palmerstown Lower Mill Complex ACA) of the Draft County Development Plan be amended to include for the promotion of the restoration of industrial heritage and mill structures including mill races and expand the exploration of uses metioned under the SLO to include tourism/outdoor recreation uses.</p>
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	<p><u>Rathcoole ACA</u> Rathcoole is listed and mapped as a proposed Architectural Conservation Area (ACA) under the Draft Plan 2016-2022, which centres on the Main Street of Rathcoole Village. This designation augments the designation of a number of protected structures within Rathcoole under the Draft Plan's Record of Protected Structures (RPS) particularly around Main Street. This includes the listing of vernacular houses.</p> <p>The Draft Plan includes policy (HCL Policy 4 Architectural Conservation Areas) to preserve and enhance the historic character and visual setting of ACAs such as Rathcoole and to carefully consider any proposals for development that would affect their special value. This is supported by Draft Plan Objectives (HCL 4 Objectives 1 and 5) that seek to avoid the removal of structures and distinctive features that positively contribute to the character of Architectural Conservation Areas and to support public realm improvements.</p> <p>It is considered that ACA and RPS designations together with the Development Plan Policy and objectives are sufficient to ensure the protection of the historic fabric and morphology of Rathcoole Village.</p> <p>It is therefore not considered necessary or appropriate to amend the Draft Plan in relation to this issue.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Cottages – Ballymount and Fox and Geese</u> The early 20th Century cottages located around Ballymount and Fox and Geese are of relatively simple exterior design and are similar to many local authority and farm labourer cottages development circa 1930s, which were fitted with relatively basic interiors.</p>
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	<p>The cottages are not recognised under the National Inventory of Architectural Heritage and are not considered to be of significant enough interest (architectural, historical or otherwise) to merit addition to the Record of Protected Structures.</p> <p>In the context of their simple design and finish and their degraded setting within an industrial estate, the cottages are also not considered to be of sufficient interest (architectural, historical or otherwise) to merit designation within an Architectural Conservation Area.</p> <p>Dwellings located at the north-eastern side of Fox and Geese are located outside of the jurisdiction of South Dublin County Council.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>St Patricks Cottages</u> The proposed removal of Saint Patrick's Cottages (RPS Refs 255, 259, 263) from the Record of Protected Structures (RPS) and designation within an Architectural Conservation Area has been informed by the Appraisal Candidate Architectural Conservation Areas, which was carried out as an independent assessment of groups of structures of special interest within the County as part of the County Development Plan Review.</p> <p>The ACA Appraisal advises that ACA designation will provide a more appropriate level of protection for terraces or groupings of dwellings that were designed and built as distinct entities. It is further advised that where such terraces are designated as protected structures (such as Saint Patrick's Cottages) and their special architectural interest does not relate to their internal appearance or construction, these should be removed from the RPS in recognition of the nature of their special visual interest or value and the appropriate level of protection that will be provided under ACA designation.</p>
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	<p>The area proposed for designated within the ACA boundary for Saint Patrick's cottages includes the single storey cottages, dormer cottages and two storey dwelling houses, which were originally designed by County architect T.J Byrne of the South Dublin Rural Council c.1915 for housing the staff and families of the adjacent Silveracres Flour Mill. These originally had large deep rear gardens, which were infilled with two storey housing of a compatible scale in the 1960s as part of the Tara Hill development. The infill development retained much of the original character of the area including the legibility of the historic layout and form of St. Patrick's Cottages.</p> <p>The ACA designation seeks to afford statutory protection to the special interest of St Patricks Cottages while providing flexibility for residents to carry out internal improvements and renovation without the need to apply for planning permission under RPS designation. The focus of the proposed ACA designation relates to protecting the significant architectural, cultural and social interest of the early twentieth century dwellings within the ACA boundary and ensure that development in the area is sensitively and appropriately designed within this context. The designation does not seek to prevent development such as exterior home improvements (including security and energy upgrades) but ensure that is carried out in a considered and responsive manner.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Strategic Environmental Assessment and Appropriate Assessment</u> Appropriate Assessment (AA) relates to the impact of plans and projects on the Natura 2000 network of protected sites across Europe that are legally protected under the Habitats Directive and the European Communities (Birds and Natural Habitats) Regulations such as Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)</p> <p>Strategic Environmental Assessment relates to the evaluation of the likely environmental effects of implementing a proposed plan in accordance with</p>
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	<p>the requirements of the European SEA Directive and national SEA Regulations.</p> <p>The SEA and AA processes are therefore not applicable or appropriate to assessing the impacts of individual development proposals on built heritage sites. All plans and projects are subject to these requirements, which are separate to the Development Management procedure.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Tallaght Village and Balrothery Cottages</u> As part of the Draft Plan review, South Dublin County Council commissioned the Appraisal of Candidate Architectural Conservation Areas 2015, which was carried out independently by a Conservation Consultant. This included an assessment of candidate Architectural Conservation Areas (ACA) that were considered to exhibit distinct character and qualities based on their built form and layout. A separate independent Review of Protected Structures 2014/15 (2015) was also carried out and helped to inform the Appraisal of Candidate ACAs.</p> <p>Further to submissions on the Draft Plan 2016-2022 in relation to ACAs and Protected Structures, a brief independent assessment has been commissioned as an addendum to the initial Appraisal of Candidate ACAs and Review of Protected Structures. The supplementary assessment includes a review of the suggested extension of the Tallaght ACA to encompass St Mary's school house and the cottages in Balrothery.</p> <p>The supplementary assessment, which was carried out by a Conservation Consultant, advises that St. Mary's School House and Balrothery Cottages are remote and separated from the historic village core of Tallaght and their inclusion within the Tallaght ACA would not be in keeping with sound conservation area designation policy and practice. It is therefore recommended that the boundary of the ACA for Tallaght Village should not</p>
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	<p>be extended and that the Draft Plan be amended to designate Balrothery Cottages within an independent ACA, with Draft Plan Maps and Table 9.1 amended accordingly.</p> <p>It is advised that there is a case to identify Balrothery Cottages as an Architectural Conservation Area on the basis of their discreet and distinct grouping with a high degree of architectural design and detailing. Further to this advice, it is recommended that Balrothery Cottages be designated within an ACA.</p> <p>Recommendation It is recommended that the Draft County Development Plan be amended to designate Balrothery Cottages within an independent ACA, with Draft Plan Maps and Table 9.1 amended accordingly.</p>
9.2.0 Landscapes	
<ol style="list-style-type: none"> Views on the east side of the L7462 scenic Road should be protected. (DRAFTDEVPLAN0057, Paul Cleary) Submission supports HCL 8 SLO 1: To seek to develop the area at the top of Esker Hill as a viewing location for views over Lucan Village and the Liffey Valley (DRAFTDEVPLAN0132, Helen Farrell) Stronger emphasis is required to protect the visual and scenic amenity of the countryside. (DRAFTDEVPLAN0212, Doireann Ni Cheallaigh, An Taisce) Include additional objectives that specify types of development considered acceptable in medium to high sensitivity landscapes and protect, conserve and enhance such areas. Discourage inappropriate development in areas of high visual amenity and ensure that the visual impact of developments on elevated sites are mitigated. Ensure developments do not conflict with LCA. 	<p>Chief Executive's Response and Recommendations The Chief Executive has carefully considered the issues raised in relation to Landscapes. Responses and recommendations are provided under the following headings:</p> <ul style="list-style-type: none"> Views and Prospects Landscape Character Assessment Dublin Mountains Liffey Valley Dodder Valley Grand Canal Non Designated Areas 12th Lock Masterplan <p><u>Views and Prospects</u> Prospects consist of panoramic rural, mountain, hill, coastal and urban landscapes that are widely visible from surrounding areas within the County such as the Dublin and Wicklow Hills and Mountains. Views largely consist of localised views of such landscapes and largely occur along stretches of rural or mountain roads.</p>

<p>(DRAFTDEVPLAN0212, Doireann Ni Cheallaigh, An Taisce)</p> <p>5. Five additional sections of rural road should be designated on Map 11 with views for preservation and protection. Prospects should be identified on a map. (DRAFTDEVPLAN0212, Doireann Ni Cheallaigh, An Taisce)</p> <p>6. Include a table of scenic routes and an additional objectives that developments on sites that could potentially impact on views and prospects to be accompanied by a visual impact and landscape assessment. (DRAFTDEVPLAN0212, Doireann Ni Cheallaigh, An Taisce)</p> <p>7. Include additional objective to develop paths and walkways that promote the Liffey Valley. (DRAFTDEVPLAN0212, Doireann Ni Cheallaigh, An Taisce)</p> <p>8. South Dublin County Council, Dublin City Council and Fingal must co-operate and plan to protect the wider area of the Liffey Valley in a more permanent manner than the SAAO. This should include for the creation of a Liffey Valley Park. (DRAFTDEVPLAN0253, Lorraine Hennessy, The Workers' Party)</p> <p>9. Modify HCL Objective 9 to leverage and support development of the Anna Liffey Mills and include objectives to establish mills, weirs and industrial cottages as an ACA. Instigate and support designation of Liffey Valley as a Natura 2000 site and NHA. Provide for protection of views in SAAO and seek to extension of SAAO without compromising its landscapes and natural heritage value. Secure public ownership of ;lands for a Liffey Valley Park. (DRAFTDEVPLAN0268, Doireann NiCheallaigh, An Taisce)</p> <p>10. It is recommended that the an additional section be inserted into the Draft County Development Plan in relation to the need to protect, preserve and maintain industrial heritage features including weirs, millraces and mills along the River Liffey and Dodder. Specific</p>	<p>Views that are identified for protection and preservation are identified on the Draft Plan Maps. Prospects are also identified on the Draft Plan Maps and are listed in Table 9.2 of the Draft Plan 2016-2022.</p> <p>The views and prospects that are listed and mapped within the Draft Plan have been informed by an independent review of views and prospect that was carried out as part of the Landscape Character Assessment of South Dublin County 2015. A total of 18 prospects are and mapped listed under the Draft Plan and rather than identifying limited points within the County that the prospects are protected from, the Draft Plan provides for their protection from prominent public places. This is considered to represent an upgraded level of protection compared to the current Plan 2010-2016.</p> <p>The Draft Plan 2016-2022 maps a significant networks of views for preservation and protection throughout the County. These include scenic routes along roads and throughout the Countryside including views into the Liffey Valley. This includes rural and mountain roads that have different local names. The provision of tables that lists all the views within the network would be exhaustive. Such repetition would significantly and needlessly add to the volume and complexity of the Draft Plan written statement.</p> <p>Section 9.2.1 of the Draft Plan states that the impact of development on the views and prospects will be assessed and that the Council will also take views and prospects of landscapes in adjoining counties into account when assessing development proposals. This is supported by HCL Policy 8 and the associated objectives, which seek to protect, preserve and improve views and prospects. This is stated to include views and prospects of special amenity, historic or cultural value or interest including rural, river valley, mountain, hill, coastal, upland and urban views and prospects that are visible from prominent public places.</p> <p>Section 11.5.5(ii) of the Draft Plan requires development proposals in high amenity zones and sensitive landscapes to require a Landscape Impact Assessment that demonstrates visual impact and outlines mitigation</p>
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<p>objectives are requested in relation to the survey of structures, drawing up a list of works for prioritisation and liaising with Fingal County Council, the OPW, agencies and landowners in relation to co-ordinating a plan of works and priorities. (DRAFTDEVPLAN0176, Benny Cullen, Canoeing Ireland)</p> <p>11. Amend HCL 10 to include provision for enhancement of access in these areas for persons with mobility problems or physical disability. Particular reference is given to Bohernabreena reservoir access. (DRAFTDEVPLAN0326, Joseph Scully)</p> <p>12. Submission from DAHG advises that there is potential conflict between HCL 11 Objective 1 (biodiversity of Grand Canal) and HCL 11 Objectives 2, 3 and 7 (walking and cycling routes). A route along the full length of the river Dodder has potential for loss of biodiversity. (DRAFTDEVPLAN0510, Simon Dolan, Department of Arts, Heritage and the Gaeltacht)</p> <p>13. Submission requests protection of Lyons Hill, Newcastle, and its hinterlands from development to protect the integrity and relevance of the site. Submission also requests inclusion of same in Table 4.3.1 [Prospects for which is it an Objective to Protect; South Dublin County Development Plan, 2010-2016]. (DRAFTDEVPLAN0170, Neville Graver, Rathcoole Community Council Limited)</p> <p>14. Submission from DAHG advises that the Wicklow Mountains National Park extends into the Dublin Mountains and it is intended to extend the park further into County Dublin and Wicklow. It is advised that HCL Policy 9 Objective 3 (Dublin Mountains) should be amended to refer to the future expansion of the National Park as opposed to its creation. (DRAFTDEVPLAN0510, Simon Dolan, Department of Arts, Heritage and the Gaeltacht)</p>	<p>measures that ensure that existing features are retained. It is also a requirement for proposals on sites with steep or varying topography to be accompanied by a comprehensive site analysis, concept proposal, design statement and sections that demonstrate how proposals incorporate the natural slope of sites. Further to submissions on this issue, it is recommended that Section 11.5.5(ii) be amended to clarify that this includes developments that could potential impact designated on views or prospects.</p> <p>The aforementioned negates the need to:</p> <ul style="list-style-type: none"> ▪ further reiterate the need to protect views and prospects and manage development in an appropriate manner ▪ further reiterate the need to take landscapes in adjoining counties into account ▪ further add to and reiterate the types of views and prospects that should be protected ▪ reiterate the need to demonstrate visual impacts of development on views and prospects ▪ reiterate the need for development to be sited appropriately and to include landscape mitigation measures ▪ reiterate the need for landscape impact assessment ▪ merge and amend policies and objectives on the protection of views and prospects <p>Support for HCL 8 SLO 1 (Esker Hill viewing location for Lucan Village and the Liffey Valley) is noted. It is not considered necessary or appropriate to seek provision of a viewing area around Balrothery in the context of the area's location adjacent to the M50 motorway and N81.</p> <p>Lyons Hill is located within the jurisdiction of Kildare County Council. The nearby Athgoe Hill, which is located within South Dublin County, is listed and mapped as a Prospect under the Draft Plan.</p> <p>Issues in relation to the impact of development on landscapes, appropriate boundary treatments, are adequately dealt with under Section 9.2.0 of the Draft Plan.</p>
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<p>15. Submission seeks to reword HCL 10 Objective 1 with regard to potential future development in the HA-LV zone, specifically with reference to the existing Hermitage Medical Clinic which represents a non-confirming use on lands subject to zoning objective I/proposed zoning objective HA-LV. Submission notes that the wording of HCL 10 Objective 1, as proposed, appears to only permit amenity related development, does not provide concessions for non-conforming uses, and would preclude the future development of Metro West. Submission proposes the following additional text be added to Objective 1: 'Proposals for medical-related development associated with the Hermitage Medical Clinic will be assessed on their own merits'. (DRAFTDEVPLAN0187, Alan Whelan, O'Connor Whelan, Hermitage Medical Clinic)</p> <p>16. Submission seeks clarity in relation to HCL 10 Objective 5, specifically with reference to the existing Hermitage Medical Clinic which represents a non-confirming use on lands subject to zoning objective I/proposed zoning objective HA-LV. HCL 10 Objective 5 states: 'To facilitate the development of Council-owned lands at Cooldrinagh and the Hermitage Clinic as publicly accessible parkland and Green Infrastructure links'. Submission requests more detail in relation to the location of these proposals, including the mapping of said lands and potential access routes to same. Submission indicates that the potential impact of Objective 5 cannot be fully assessed until such detail is provided. (DRAFTDEVPLAN0187, Alan Whelan, O'Connor Whelan, Hermitage Medical Clinic)</p> <p>17. Request for preparation of 12th Lock Masterplan to be reinstated into the Development Plan. (DRAFTDEVPLAN0405, Mr & Mrs Power)</p> <p>18. Submission notes requirement for high quality, formal entrances and boundaries to Dodder Valley Park and Liffey Valley.</p>	<p>With regards to the proposed designation of additional views for protection under the Draft Plan:</p> <ul style="list-style-type: none"> ▪ Views on the eastern side of the L7462 are significantly obscured by existing dense roadside hedgerows and it is not considered necessary or appropriate to extend protected views to this side of the road. ▪ It is accepted that unobstructed scenic views of areas of natural beauty (Dublin Mountains) are afforded along the entire eastern side of Ballinascorney Lane and intermittently along the western side of the lane. These views should be mapped for protection. ▪ It is accepted that unobstructed scenic views of areas of natural beauty and interest (Dublin Mountains, Dublin City and Bay) are afforded along the eastern side of Ballymaice Lane. These views should be mapped for protection. ▪ It is accepted that unobstructed scenic views of areas of natural beauty (Dublin Mountains) are afforded intermittently along Shankhill Road particularly on the western side of the road. These views should be mapped for protection. ▪ The majority of scenic views of areas of naturally beauty along roads between the townland of Saint Anne's in Bohernabreena and Castlekelly Bridge are already identified for protection and preservation of the Draft Plan Maps. ▪ It is not considered that views along the northern side of Tibbradden Road are of sufficient natural beauty or interest to merit designation as protected views. The southern side of the road immediately abuts the administrative boundary with Dun Laoghaire Rathdown County Council. <p>Recommendation It is recommended that Section 11.5.5(ii) of the Draft County Development Plan be amended as follows:</p> <ul style="list-style-type: none"> ▪ To clarify that the requirement to carry out Landscape Impact Assessment includes development that could potential impact on designated on views or prospects. ▪ Identify the following views for protection and preservation on Development Plan Maps: <ul style="list-style-type: none"> ○ Ballinascorney Lane: Views along the entire eastern side of the lane and intermittent views along the western side of the lane.
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<p>Submission also requests inclusion of an SLO under HCL Policy 9 to facilitate a viewing hill and area at Balrothery Hills. (DRAFTDEVPLAN0261, Gerard Stockil, Tallaght Community Council)</p> <p>19. Submitted that additional paragraphs be included in Section 9.2.0 (Landscapes) that provide information in relation to:</p> <ul style="list-style-type: none"> - The importance of Landscapes in relation to the tourist industry, visual amenity, quality of life and wellbeing, sense of identity and sense of place. - The key to a successful landscape policy involving management of change in a way that respects the natural environment and rural areas. - The Council's pro-active approach to the landscape with policies that seek to conserve and enhance landscape character by protecting significant landscape elements. - The LCA process and classification of landscapes under the Heritage Act 1995. – Environmental Impact Statement/Assessment and Historic Landscape Character Areas. <p>It is also Submitted that Policy HCL 7 should be sub divided into 2 sections that relate to (A) All Landscape and (B) Sensitive Landscape.</p> <p>In relation to (A) it is requested that policy sets out to:</p> <ul style="list-style-type: none"> - protect the amenity value of the open countryside and the natural beauty of the landscapes by ensuring that they meet high standards of siting and design and requiring applicants to demonstrate that new development can be as adequately absorbed into its surroundings without significant adverse visual impacts. - Encourages appropriate development that enhance an existing degraded landscape and/or which would enhance and introduce views to or from a Landscape of Greater Sensitivity and resists developments that fails to appropriately integrate into the landscape with regard to visual impact. - Seeks to adopt a regional approach in the protection of the environment, co-operating with neighbouring counties in the 	<ul style="list-style-type: none"> ○ Ballymaice Lane: Views along the entire eastern side of the lane. ○ Shankhill Road: Intermittent views along both sides of the road particularly the western side. <p><u>Landscape Character Assessment</u></p> <p>The introduction to the Landscape's Section under Section 9.2.0 of the Draft Plan 2016-2022 includes a strong policy response (HCL Policy 7) to preserve and enhance the character of the County's landscapes particularly areas that have been deemed to have a medium to high Landscape Value or medium to high Landscape Sensitivity and to ensure that landscape considerations are an important factor in the management of development. This is followed by HCL 7 Objective 1 and 2, which seeks to ensure that development is assessed against Landscape Character, Landscape Value and Landscape Sensitivity as identified in the Landscape Character Assessment for South Dublin County 2015 and that protect and enhance the landscape character of the County in accordance with The Landscape and Landscape Assessment Consultation Draft of Guidelines for Planning Authorities, 2000, and Government guidance on Landscape Character Assessment and the National Landscape Strategy. Issues in relation to Historic Landscape Character Assessment are included in the Landscape Character Assessment (LCA) of the County and were utilised to inform the LCA including the identification of Landscape Character Areas. This included the identification of Historic Landscapes and the production of an Emerging Historic Landscape Character Assessment.</p> <p>HCL Policy 7 recognises that LCA is not limited to landscape that are considered to be of a high landscape value and is supported by Section 11.5.5, which requires proposals in high amenity zones and sensitive landscapes to be accompanied by Landscape Impact Assessment that demonstrates visual impact and outlines mitigation measures that ensure that existing features such as geological features are retained. It is also a requirement for proposals on sites with steep or varying topography to be accompanied by a comprehensive site analysis, concept proposal, design statement and sections that demonstrate how proposals incorporate the natural slope of sites.</p>
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protection of the landscape.

In relation to (B) it is advised that policy be amended to:

- Protect areas of medium to high Landscape Value or Sensitivity and ensure that landscape considerations are an important factor in the management of development and resist development that would interfere with the character of the landscape while ensuring that there is an overriding need to demonstrate that careful consideration is given to site selection, scale, siting, design and assimilated into the landscape in a manner which minimises potential adverse impacts on the landscape.
- Requires proposed developments to include a landscape report detailing impact on the landscape and mitigation measures while ensuring that they do not impinge on the character, integrity and distinctiveness of highly sensitive areas and does not detract from scenic value.
- Enhance and introduce views to or from a Landscape of Greater Sensitivity.
- Prohibit new development that would cause unacceptable visual harm, or introduces incongruous landscape elements.

It is submitted that objectives under Section 9.2.0 be merged, amended and replaced to:

- Ensure the preservation, enhancement and protection of the uniqueness of a landscape character type having regard to the character, value and sensitivity of a landscape and ensuring that the proposal protects the appearance and character of the Landscape and fully complies with the LCA.
- Ensure that development reflects and, where possible, reinforce the distinctiveness and sense of place of the landscape character types by taking into account elements such as geology scenic quality, historic heritage and tranquillity.
- Ensure that proposed developments would not conflict with the policies and objectives set out in the LCA and associated map.
- Ensure the preservation of the uniqueness of a landscape character type having regard to the character, value and sensitivity

The aforementioned negates the need to:

- reiterate the importance of landscape policy in relation to the management of change,
- reiterate protection for areas of medium to high Landscape Value or Sensitivity,
- reiterate the need to protect the character, value and sensitivity of a landscape and to have regard to the LCA
- reiterate consideration of landscape impact in the management of development and need to minimise potential adverse impacts on the landscape
- reiterate the need for visual and landscape impact assessment and the need to retain existing features including topography
- reiterate compliance with government guidance on Landscape Character Assessment and the National Landscape Strategy
- identify further landscape character areas or historic landscapes
- prohibit inappropriate development and development that would have significant adverse impact
- split policy that differentiates between landscapes of different sensitivities
- merge, amend and replace objectives

Issues in relation to views and prospects are adequately dealt with under Section 9.2.1 of the Draft Plan. Issues in relation to Environmental Impact Assessment, the protection of Natura 2000 sites/Appropriate Assessment, public rights of way/permissive access routes, tourism, building heights and common grazing grounds are adequately provided for under other relevant sections of the Draft Plan.

All areas that are identified as having medium to high sensitivity landscapes are subject to zoning objectives that are mapped on the Draft Plan Maps. Each of the zoning objectives are subject to zoning tables that already prescribe uses that are considered appropriate in each area of the County by listing them as permitted in principle or open for consideration subject to assessment against the policies, objectives and standards contained throughout the County Development Plan.

of the landscape.

- Support and implement the National Landscape Strategy and provide for sustainable management of landscapes including archaeological and upland landscapes.
- Recognise the diverse and unique landscape character of the county and designate/zone Landscape Conservation Areas and ensure that development does not adversely impact on visually important/sensitive areas.
- Ensure that a Historic Landscape Characterisation is carried out and taken into account in plan making and development management and ensure that development reflects and reinforces the distinctiveness and sense of place of identified historic landscape types.
- Preserves the amenity value, visual integrity and rural character of open/unfenced landscape of the uplands, areas of rough grazing and commonage, and Natura 2000 sites and secures access thereto.
- Discourages inappropriate development in open countryside and prohibits development that are likely to have significant adverse visual impacts on the character of the uplands.
- Ensure that development will not significantly interfere or detract from scenic uplands and that proposed developments reduce visual impacts and avoid that visually prominent sites.
- Have regard to the potential impacts of development on sensitive upland areas.
- Safeguard and protect skylines and ridgelines from development.
- Ensure that the visual impact of developments on steep or elevated sites are minimised or mitigated.
- Support and implement the provisions of the National Landscape Strategy and provide for sustainable management of landscapes including archaeological and upland landscapes.
- Protect the character of the landscape by ensuring that development does not conflict with the policies and objectives set out in the Draft Landscape and Landscape Assessment Guidelines for Planning Authorities (2000) and any updated versions.
- Take cognisance of the 2005 EUR Report from the European

The designation of zoning objectives across the County has been informed by the Landscape Character Assessment and the majority of lands identified as having medium to high sensitivity landscape sensitivity are zoned as High Amenity (HA-DM/LV/DV) or as Rural (RU) under which uses have been to those that are appropriate to such areas subject to rigorous assessment. This is strengthened by HCL Policy 7 (Landscapes).

Combined with the Draft Plan policy to protect and enhance the visual amenity of High Amenity areas (policies HCL 9, 10 and 11), to restrict the visual impact of development and to carry out Landscape Impact Assessment; these provisions will discourage inappropriate development in areas of high visual amenity and ensure that the visual impact of developments on elevated sites are mitigated. This will in turn ensure that the visual and scenic amenity of the countryside is adequately protected.

A further prescription of development/uses would undermine the zoning objectives and create a conflicting parallel land use designation and assessment process.

It is accepted that the introduction to Chapter 9 should be amended to acknowledge the benefits of protecting the heritage and landscapes of the County. Section 11.5.5(ii) should also be amended to support development that enhances existing degraded landscapes and ensure that development is carefully sited, designed and of an appropriate scale.

Recommendation

It is recommended that the Draft County Development Plan be amended as follows:

- Amend Chapter 9 introduction to acknowledge the benefits of protecting the heritage and landscapes of the County and insert details in relation to the background of the LCA process into 9.2.0.
- Amend Section 11.5.5(ii) to support development that enhances existing degraded landscapes and include a need to ensure that development is carefully sited, designed and of an appropriate scale.

Landscape Character Assessment Initiative.

- Considers appropriate rural recreational and tourism related developments which would facilitate public access to landscapes.
- Provide for recreational use by local communities and for natural resource tourism in High Amenity Areas.
- Liaise and co-operate with adjoining councils to ensure that development plan policies are consistent in the protection and management of landscape and that they support the co-ordinated designation of sensitive landscape.
- Require screening for Appropriate Assessment.
- Consider requirement for sub-threshold EIS.

([DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open](#))

20. Requested that the 3rd paragraph 1st sentence in Section 9.2.1 (assessment of impact of development on views and prospects) be incorporated as an Objective in Policy 8 and that additional information be included in relation to:
- The amenity value of views and prospects and the need to protect and conserve them where they adjoin public roads.
 - The need to manage development so that it does not hinder or obstruct views and prospects and ensure that development is designed and located to minimise its impact.
 - The Council will take into account the views and prospects of adjoining counties in assessing planning applications.
 - A Table of Scenic Routes with accompanying Maps.
- It is submitted that HCL Policy 8 Views and Prospects be merged with Objective 1 and augmented with an objectives that:
- Protect views, focal points and prospects, including those located outside the county, visual linkages between established landmarks and landscape features and designated Scenic Routes, or on views to and from places of natural beauty or interest to recorded monuments, lakes, lakeshores, rivers, unspoilt mountains, uplands, historic sites, views of historic significance, natural beauty, of high or special amenity value
 - Prohibits intrusive and insensitive development that would interfere with the character and visual amenity of the landscape or adversely

Dublin Mountains

It is noted that the Wicklow Mountains National Park adjoins the County at Glenasmole and Kippure and extends into Glendoo. This is reflected by the Action listed under HCL Policy 9 of the Draft Plan 2016-2022. It is accepted that HCL 9 Objective 3 should be amended to refer to the future expansion of the National Park as opposed to its creation.

Recommendation

It is recommended that HCL 9 Objective 3 of the Draft County Development Plan be amended to refer to the future expansion of the Wicklow Mountains National Park within South Dublin.

Liffey Valley

A strategy for the development of a Liffey Valley Park has been produced in partnership between the Office of Public Works, Dublin City Council, Fingal County Council, South Dublin County Council and Kildare County Council. Further to the publication of Towards a Liffey Valley Park, 2007, Waterstown Park Liffey Valley was opened in May 2009 and marked a milestone in the development of an overall Liffey Valley Park.

HCL 10 Objective 2 of the Draft Plan 2016-2022 supports the strategy by seeking to ensure that development within the Liffey Valley will not prejudice the future creation and development of uninterrupted and coherent parklands including local and regional networks of walking and cycling routes.

This is strengthened by HCL 10 Objective 4, which seeks to facilitate and support the development of the Liffey Valley (Zoning Objective 'HA – LV') as an interconnected greenway and park with further collaboration with Dublin City Council, Fingal County Council, Kildare County Council, the OPW, existing landowners and community groups to include for the identification and designation of possible future new pedestrian routes and footbridge locations. It is accepted that HCL 10 Objective 4 should be amended to

affect tourism and enhances them by removing derelict sites and eyesores.

- Requires applicants to specify materials that demonstrates impact on the character of a scenic route and views towards visually vulnerable or sensitive areas.
- Protects scenic amenity routes from insensitive development by integrating them into landscape areas.
- Curtails development along canal and river banks that could cumulatively affect the quality of a designated view. Due regard will be paid in assessing applications to the span and scope of the view/prospect and the location of the development within that view and prospect.
- Requires applicants in the environs of a scenic route and/or an area with important views and prospects to demonstrate that there be no adverse obstruction or degradation of views.
- Encourages appropriate landscape and screen planting for developments along scenic routes.
- Ensures that developments in river valleys will not adversely affect or detract from protected views or distinctive linear sections of river valleys.
- Resists development that would interfere with a prospect and prevents development that would block or interfere with a protected view.
- Seeks the removal or lowering of walls or other obstructions.
- Requires planning applications that have the potential to adversely impact upon Protected Views and Prospects to be accompanied by a visual and landscape assessment that demonstrates how impacts have been anticipated and avoided.

[\(DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open\)](#)

21. Submitted additional paragraph be added to Section 9.2.4:
The Council will take the initiative in inviting Fingal, Dublin City Council and Kildare County Council to work collaboratively and positively for its development and shall bring forward firm proposals.
[\(DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open\)](#)

make reference to Towards a Liffey Valley Park, 2007. It is accepted that this objective should be amended to promote universal accessibility for all.

The existing strategy and objectives contained in the Draft Plan negates the need to include additional objectives for securing the development of a Liffey Valley Park including the development of paths and walkways. Proposals to develop tourism facilities are beyond the strategic land use function of the County should be directed to the County Tourism Strategy.

The Anna Liffey Flour Mills and associated buildings and structures are located within the administrative boundary of Fingal County Council. This includes the majority of the Anna Liffey Weir. It is considered to be beyond the strategic land use and transport planning function of the County Development to specify entrances and boundary treatment to the Liffey Valley.

Liffey Valley is already designated as a pNHA. HCL Policy 13 Objectives 1 and 2 seeks to ensure that development proposals within or adjacent to pNHAs are sited and designed to minimise impact on biodiversity and is restricted to development that is directly related to the area's amenity potential. The designation of Natura 2000 sites is wholly within the remit of the National Parks and Wildlife Services and is beyond the role and function of a County Development Plan and therefore cannot be carried out or actioned through same. Indicating support for the designation of such sites would inappropriately prejudice the process of designation.

The designation of a Special Amenity Area Order (SAAO) comprises a process that is separate and independent to the County Development Plan Review process that statutorily requires public consultation and includes a statutory timeframe thus negating the need to amend policy in the Draft Plan in relation to these aspects of making a Special Amenity Area Order. HCL Policy 14 of the Draft Plan seeks to implement and improve the Liffey Valley Special Amenity Area Order (SAAO). It is also an Action of the Draft Plan to improve and extend the Liffey Valley SAAO and promote its tourism potential and to bring privately owned lands within the Liffey Valley into public ownership. This negates the need for additional objectives in relation

<p>22. Submitted that additional objectives be included under Policy HCL 10 as follows:</p> <p>1 Secure the preservation of the Liffey Valley and its landscapes as a major resource for tourism and develop paths and walkways, where appropriate. Seek to have the lands brought into public ownership during the lifetime of the Plan.</p> <p>2 Promote and develop in line with the policies and objectives of the OPW document 'Towards a Liffey Valley Park' (2008) during the lifetime of the Plan.</p> <p>3 Promote the Liffey Valley as having major tourism potential. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p> <p>23. Submitted that additional objectives be included in Section 9.2.5 as follows:</p> <p>Protect, preserve, maintain, improve and enhance the national heritage, recreational and amenity value (including walking and cycling) of the Grand Canal corridor its towpaths by controlling development and by co-operating with WI and neighbouring local authorities. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p> <p>24. Submission notes that signage in the Liffey Valley is virtually none existent, submission suggests that the Plan should include a commitment for comprehensive signage throughout the Valley in consultation with the other Local Authorities. (DRAFTDEVPLAN0248, Joe Byrne, Liffey Valley Park Alliance)</p>	<p>to the protection, extension or acquisition of the Liffey Valley SAAO.</p> <p>Public service uses such as Metro West are listed under the 'HA-LV' Zoning Objective as being 'Open to Consideration' subject to acceptable landscape impact assessment. It is noted that the Hermitage Medical Clinic operates as a non-confirming use on lands zoned objective 'HA-LV'. Section 11.1.1 of the Draft Plan allows non-conforming to continue to develop where the proposed development would not be detrimental to the amenities of the surrounding area and would accord with the principles of proper planning and sustainable development. Wholesale provision for medical related development under HCL Policy 10 within the Liffey Valley would allow for such development to occur across all lands zoned Objective 'HA-LV'. This would be at variance with the restrictions set out under the Liffey Valley SAAO and would also undermine the zoning objective of these lands and policies and objectives of the County to restrict development within the Liffey Valley and protect its visual, environmental and recreational value. Such an amendment would therefore be inappropriate and unnecessary.</p> <p>The acquisition of privately owned lands for the creation of a Liffey Valley Park is beyond the strategic land use function and budgetary constraints of the County Development Plan and cannot be achieved or actioned through same. A similar proposal was subject to Motion Nos.309, 310 and 311 of the June 2015 County Development Plan meeting and were subsequently withdrawn.</p> <p>It is noted that HCL 10 Objective 5 seeks to develop and provide access to lands at the Hermitage Clinic and the owners of the Hermitage Clinic have made a submission that raises concerns in relation to this objective. It is accepted that objectives such as HCL 10 Objective 5 can create uncertainty and confusion for land owners and businesses, however, this objective was inserted in the context of a commitment to provide through access to the Liffey Valley and river bank and dedicate approx. 3.3 hectares of land as part of the planning permission for the Hermitage Clinic under S01A/0539 – PL 06S.128044. The requirement to provide public through access was also included as a condition of the planning permission (condition no. 2). Given that the through access is yet to be realised HCL 10 Objective 5 is</p>
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	<p>considered to be reasonable, appropriate and necessary.</p> <p>The provision of directional signage in the Liffey Valley is beyond the strategic planning and land use function of the County Development Plan and therefore cannot be achieved or actioned through same. The identification, funding and provision of signage in the Liffey Valley in partnership with the relevant landowners should be directed towards the County Tourism Strategy.</p> <p>Recommendation It is recommended that HCL 10 Objective 4 of the Draft County Development Plan be amended to make reference to Towards a Liffey Valley Park, 2007, and to promote universal accessibility for all, where environmental and built heritage sensitivities are not negatively impacted.</p> <p><u>Dodder Valley</u> The River Dodder Greenway Feasibility Study Report was published in January 2015 for the entire length of the River Dodder in collaboration with Dublin City Council and Dún Laoghaire - Rathdown County Council. Preferred route options and preliminary designs for a high quality amenity and commuter route have either been prepared or are in the process of preparation.</p> <p>It is accepted that HCL 10 Objective 4 of the Draft Plan 2016-2022 should be amended to make reference to promote universal accessibility for all, where environmental and built heritage sensitivities are not negatively impacted.</p> <p>It is considered inappropriate to pre-empt aspects in terms of the outcome entrances and boundary treatment prior to the completion of preliminary designs and application for development. Such details are also beyond the strategic land use and transport planning function of the County Development.</p> <p>Recommendation:</p>
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	<p>It is recommended that HCL 10 Objective 4 of the Draft County Development Plan be amended to promote universal accessibility for all, where environmental and built heritage sensitivities are not negatively impacted.</p> <p><u>Grand Canal</u></p> <p>It is noted that there is potential conflict between HCL 11 Objective 1 (biodiversity of Grand Canal) and HCL 11 Objectives 2, 3 and 7 (walking routes, cycling routes and water based activities) of the Draft Plan 2016-2022 if development were not designed or screened appropriately in accordance with the requirements of Planning and Development Legislation including that which relates to Environmental Impact Assessment and Appropriate Assessment.</p> <p>The Grand Canal has a long established history of usage for walking and cycling and water based activities including fishing and boating. This is reflected by the objectives contained in the current Plan 2010-2016 that seek to (inter alia) enhance the recreational amenity of the Grand Canal including water activities locations and secure walkways along the Grand Canal including the completion of the Grand Canal Way. HCL 11 Objective 7 of the Draft Plan provides for the extension of the Grand Canal Green Route in partnership with Waterways Ireland and Kildare County Council.</p> <p>The range of objectives set out under HCL Policy 11 aims to strike a balance between recreational use and habitat protection. This is strengthened by HCL Policy 13 Objectives 1 and 2, which seek to ensure that development proposals within or adjacent to pNHAs are sited and designed to minimise impact on biodiversity and is restricted to development that is directly related to the area's amenity potential. G3 Objective 2 of the Draft County Plan also seeks to maintain a biodiversity protection zone of not less than 10 metres from the top of the bank of all watercourses in the County, with the full extent of the protection zone to be determined on a case by case basis by the Planning Authority, based on site specific characteristics and sensitivity. G4 Objective 4 also aims to minimise the environmental impact of external lighting at sensitive locations within the Green Infrastructure network in order to protect light-sensitive species such</p>
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	<p>as bats.</p> <p>It is considered that the provisions of Planning and Development Legislation combined with the objectives contained within the Draft Plan are sufficient to ensure for the protection of the Grand Canal pNHA together with the realisation of the extension of the Grand Canal Way Green Route in co-operation with the relevant authorities.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Non Designated Areas</u> HCL Policy 15 recognises the issue of protected habitats and species occurring outside of protected sites and takes cognisance of the Habitats Directive and the Precautionary Principle in its responses. It is not considered necessary or appropriate to quote case law or to provide further interpretations of the Habitats Directive within the County Development Plan given that this would needlessly add to the volume and complexity of this strategic land use and transportation document.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>12th Lock Masterplan</u> HCL 11 Objective 6 of the Draft Plan 2016-2022 specifically seeks to enhance the industrial heritage and the recreational and amenity potential of the 12th Lock and pursue the protection and conservation of the rich natural, built and cultural heritage of the area including natural habitats and ecological resources along the Grand Canal and Griffeen River.</p> <p>A Draft 12th Lock Masterplan was presented to the Lucan Area Committee in January, February and March 2013 and is awaiting finalisation. The context</p>
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	<p>for the Masterplan has been changed under the Draft Plan through the designation of lands on the north-eastern side of the 12th Lock under zoning objectives RES-N, which provides for the preparation of a statutory and a more comprehensive Local Area Plan. In combination with the provisions made under HCL 11 Objective, this negates the need to reinstate a requirement for a 12th Lock Plan.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
9.3.0 Public Rights of Way and Permissive Access Routes	
<ol style="list-style-type: none"> 1. Amend HCL 15 Objective 2 (protected species) to reflect Precautionary Principle, Habitats Directive and ECJ Case 183/05. (DRAFTDEVPLAN0268, Doireann NiCheallaigh, An Taisce) 2. Submitted that the following be inserted after '(SAAO)' in Section 9.3.3 Policy 14: in consultation with all relevant stakeholders and protect and enhance it. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open) 3. Submitted that a timeframe of within two years of the adoption of the Plan be added to Action 1 in Section 9.3.3. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open) 	<p>Chief Executive's Response and Recommendations <u>HCL Policy 15</u> HCL Policy 15 recognises the issue of protected habitats and species occurring outside of protected sites and takes cognisance of the Habitats Directive and the Precautionary Principle in its responses. It is not considered necessary or appropriate to quote case law or to provide further interpretations of the Habitats Directive within the County Development Plan given that this would needlessly add to the volume and complexity of this strategic land use and transportation document.</p> <p><u>SAAO</u> The designation of a Special Amenity Area Order (SAAO) comprises a process that is separate and independent to the County Development Plan Review process that statutorily requires public consultation and includes a statutory timeframe thus negating the need to amend policy, objectives or actions in the Draft County Development plan in relation to these aspects of making an Amenity Area Order. HCL Policy 14 of the Draft County Development Plan seeks to implement and improve the Liffey Valley Special Amenity Area Order (SAAO). It is also an Action of the Draft Plan 2016-2022 to improve and extend the Liffey Valley SAAO and promote its tourism potential and to bring privately owned lands within the Liffey Valley into public ownership. This negates the need for additional actions or objectives in relation to the protection, extension or acquisition of the Liffey Valley</p>

	<p>SAAO.</p> <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p>
9.4.0 Public Rights of Way and Permissive Access Routes	
<ol style="list-style-type: none"> 1. Request that the Dublin Mountains Way be expanded to include Killinarden Park, Kiltipper Park to progress to Ballamallick, Castlekelly and Ballinascorney. (DRAFTDEVPLAN0024, Gary Tyrrell) 2. Negotiations should be undertaken with the Italian Ambassador/Government to at least establish a permissive access route along the River Liffey around Lucan House. (DRAFTDEVPLAN0144, Kevin O'Loughlin) 3. Amend HCL 16 Objective 2 (Permissive Access Routes) to ensure that routes do not compromise environmental sensitivities. (DRAFTDEVPLAN0268, Doireann NiCheallaigh, An Taisce) 4. Submitted that the legal status of Public Rights of Way and Permissive Access Routes are entirely different and that they should be dealt with separately. Accordingly, Permissive Access Routes should be deleted from the Title and these Routes can be included in Walking & Cycling in Section 6.30. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open) 5. Submitted that the 1st sentence of the 1st paragraph in Section 9.4.0 be replaced by: The preservation of public rights of way which give access to seashore, mountain, lakeshore, riverbank or other place of natural beauty or recreational utility, which public rights of way shall be identified both by marking them on at least one of the maps forming part of the development plan and by indicating their location on a list 	<p>Chief Executive's Response and Recommendations</p> <p>The Chief Executive has carefully considered the issues raised in relation to Public Rights of Way and Permissive Access Routes. Responses and recommendations are provided under the following headings:</p> <ul style="list-style-type: none"> ▪ General ▪ Public Rights of Way ▪ Permissive Access Routes ▪ Dublin Mountains Way <p><u>General</u></p> <p>The grouping of objectives on the provision of Permissive Access Routes (see response below) with objectives in relation to Public Rights of Way is considered to be a pragmatic approach to promoting access through a variety of complementary and multi-faceted measures including those that represent proven and viable alternatives to the often complex and lengthy legal proceedings in identifying public rights of way.</p> <p>This multifaceted approach is reflected under HCL Policy 16 of the Draft Plan 2016-2022, which seeks to promote and improve access to high amenity, scenic, and recreational lands throughout the County, including places of natural beauty or utility, for the purposes of outdoor recreation. The type of places to which access should be promoted is adequately summarised under HCL Policy 16 and augmented under its associated objectives, which includes historic sites (such as archaeological sites, National Monuments), waterways, lakeshores, riverbanks and mountains.</p> <p>The review of walking and cycling routes is beyond the strategic land use function and scope the Draft Plan and therefore cannot be achieved or</p>

<p>appended to the development plan. Submission outlines that this is the actual wording from Planning & Development Act and that each new development plan must fulfil the above requirement and no deferment will be permitted.</p> <p>Submitted that the listing of public rights of way is an urgent matter as the lack of certainty on access has not only affected the rights of local people but has been the major cause of the failure of walking tourism to reach its full potential.</p> <p>If an Interim list is included in the Plan the following should be appended to the list or provided in the written statement: The omission of a right of way from this list shall not be taken as an indication that such right of way is not a public right of way.</p> <p>Submitted that the following additional paragraph be included in Section 9.4.0: Public Rights of Way have existed over the centuries and constitute an important recreational amenity for local people and visitors and an economic asset. They enable the enjoyment of high quality landscape and cultural heritage and provide a valuable link to natural assets such as lakes, bogs and forests. A public right of way is a person's right of passage along a road or path, even if the route is not in public ownership. Council recognises the importance of maintaining and protecting Public Rights of Ways. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p> <p>6. Submitted to amend HCL policy 16 objectives to:</p> <ul style="list-style-type: none"> - Include an Interim list of public rights of way. - Relocate reference to geological and geo-morphical features to 9.7.0 (Sites of Geological Interest) - Suspend the promotion and facilitation of Permissive Access Routes. - Relocate Objective 4 (access to historic sites) to 9.1.1 (ARCHAEOLOGICAL SITES) - Encourages and facilitate the creation of additional rights of way and extends existing ones. 	<p>actioned through the County Development Plan.</p> <p>Greenways are already promoted under ET Policy 6 of the Draft Plan. Greenways largely traverse public open spaces and operate akin to public rights of way thus negating the need to list and map them as public rights of way. HCL 16 Objective 4 of the Draft Plan already promotes access to historic sites in partnership with the relevant landowners.</p> <p>It is accepted that HCL Policy 16 should be amended to promote and improve access to high amenity, scenic and recreational areas within adjoining counties as well as within the County.</p> <p>Recommendation</p> <p>It is recommended that HCL Policy 16 of the Draft County Development Plan be amended to promote and improve access to high amenity, scenic and recreational areas within adjoining counties.</p> <p><u>Public Rights of Way</u></p> <p>The statutory requirements in relation to the preservation of public rights of way are summarised appropriately under Section 9.4.0 and it is not considered necessary to repeat the full contents of Planning and Development Legislation or further narrative on this issue that would add to the volume and complexity of the Draft Plan 2016-2022 as a strategic land use document.</p> <p>In accordance with the provisions of Planning and Development Legislation, HCL 16 Objective 1 of the Draft Plan seeks to preserve and map public rights of way as they come to the attention of the Council. When this occurs, notice must be given to the owner or occupier of the lands who has a right of appeal to the Circuit Court. It is advised that the identification of a public right of way requires proof or verification of the right of way normally in the form of statement of permission from the landowner or 'dedication' at some point in time.</p> <p>No public rights of way have heretofore been brought to the attention of the</p>
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<ul style="list-style-type: none"> - Provides for a review of walking and cycling routes and brings forward proposals within two years for the creation of public rights of way particularly in areas of high amenity, uplands, lake shores, river banks, forests, heritage sites, areas of historic or archaeological importance and National Monuments. - Provides for linkages from built up areas to the countryside and public rights of way in adjoining counties. - Provides for signposting and waymarking on rights of way. - Protects and promote Greenways and considers designating them as public rights of way. - Identify and maps public rights of way and incorporates them in the Plan. - Provide access to archaeological sites, National Monuments, seashores, lakeshores, riverbanks, upland areas, water corridors or other places of natural beauty or recreational utility and encourages cycling and walking. - Prohibits development and keeps existing rights of way free from obstruction. - Looks favourably on planning applications which include proposals to improve the condition and appearance of existing rights of way. - Identifies existing Public Rights of Way and established walking routes prior to any new development capable of affecting rights of way. - Prohibits development where a public right of way will be affected unless its character and convenience is maintained by mitigation. <p>(DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p>	<p>Planning Authority for investigation. This includes all submissions received during the County Development Plan review stage at pre-draft and draft stage. This does not affect the validity of any public rights of way that may exist.</p> <p>Issues raised under the submission on public rights of way fail to take cognisance of the fact that identifying a public right of way can encounter complex and lengthy legal proceedings. There is no other basis to establish legal and permanent routes under Planning and Development Legislation and there is no facility for the preparation of an interim list. Similar issues were raised under Motion No. 305 of the June 2015 County Development Plan Meeting, which was withdrawn subsequent to the response and recommendations of the Chief Executive. See also response below in relation to the creation to Permissive Access Routes.</p> <p>The provision of directional signage along public rights of way is beyond the strategic planning and land use function of the County Development Plan and therefore cannot be achieved or actioned through same. The identification, funding and provision of such should be directed towards the County Tourism Strategy.</p> <p>Reference to providing access to geological and geo-morphical features under HCL 16 Objective 1 (public rights of way) was inserted into the Draft Plan through Motion 304 of the June 2015 County Development Plan Meeting. This was considered to be appropriate in the context that HCL 16 Objective 1 relates to the provision of access to heritage features. This reflects a holistic approach to promoting and protecting heritage features throughout the County Development Plan from a variety of perspectives.</p> <p>IE4 Objective 6 of the Draft Plan already requires the identification of adjacent Public Rights of Way and established walking routes by applicants prior to any new telecommunication developments (including associated processes) and to prohibit telecommunications developments that impinge thereon or on recreational amenities, public access to the countryside or the natural environment. This objective was inserted into the Draft Plan subsequent to Motion 271 of the June 2015 County Development Plan</p>
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	<p>Meeting.</p> <p>It is considered that the insertion of an objective into the Draft Plan that seeks to further limit development within the County prior to the resolution of unrelated and complex legal matter in relation to public rights of way would be overly restrictive and would adversely impact on development within the County.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Permissive Access Routes</u> A more successful arrangement for providing access to high amenity areas can involve the creation of 'Permissive Access Routes' such as the Dublin Mountain Way and the Western Greenway in Mayo and such arrangements are relevant to the difficulties with creating public rights of way. These permissive paths are considered to be extremely successful from a tourism, recreation and amenity perspective.</p> <p>Within this context HCL 16 Objective 2 of the Draft Plan 2016-2022 seeks to promote and facilitate the creation of Permissive Access Routes and heritage trails that will provide access to (inter alia) forestry, woodlands, waterways, rural areas, upland/mountain areas and between historic villages in partnership with landowners, semi-state and other public bodies including Coillte and the Forest Service. It is accepted that HCL 16 Objective 2 should be amended to help ensure that Permissive Access Routes do not compromise environmentally sensitive sites.</p> <p>Proposals in relation to the negotiation and provision of specific Permissive Access Routes should be directed towards the County Tourism Strategy and/or the County Heritage Plan.</p> <p>Recommendation It is recommended that HCL 16 Objective 2 of the Draft County</p>
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	<p>Development Plan be amended to seek to ensure that Permissive Access Routes do not compromise environmentally sensitive sites.</p> <p><u>Dublin Mountain Way</u> The Dublin Mountains Partnership, which includes South Dublin County Council, is developing an integrated plan for the Dublin Mountains through linking (in the form of the Dublin Mountain Way) existing and potential outdoor recreation components in forests and other public or state owned lands in partnership with other local authorities and land owners. The designation of the Dublin Mountain Way is therefore the function of the Dublin Mountains Partnership and cannot be achieved or actioned through the County Development Plan.</p> <p>HCL 16 Objective 3 of the Draft County Development Plan seeks to promote and facilitate the continued development of the Dublin Mountains Way in association with the Dublin Mountains Partnership particularly routes that provide access to regional and local networks of walking, running , hiking and mountain bike trails and other recreational facilities.</p> <p>It would be inappropriate and beyond the function of the County Development Plan to unilaterally attempt to identify additional sections of routes for the Dublin Mountain Way without input or agreement with the Dublin Mountains Partnership including landowners and in the absence of appropriate feasibility studies.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
9.5.0 Tree Preservation Orders	
<p>1. Include an objective to identify hedgerows and trees that warrant such protection. (DRAFTDEVPLAN0268, Doireann NiCheallaigh, An Taisce)</p>	<p>Chief Executive's Response and Recommendations G2 Objective 9 of the Draft Plan 2016-2022 seeks to preserve, protect and augment trees, groups of trees, woodlands and hedgerows within the County. This is supported by HCL 17 Objective 2, which seeks to protect</p>

<p>2. Submission queries whether large fir trees in Tymon, 'in Molloy's and the ITT' are protected as they do not appear on the Tree Preservation Orders list. (DRAFTDEVPLAN0261, Gerard Stockil, Tallaght Community Council)</p>	<p>existing trees, hedgerows, and woodlands which are of amenity or biodiversity value and/or contribute to landscape character and ensure that proper provision is made for their protection and management. It is noted that the latter objective should be relocated to Policy 15 (non-designated areas).</p> <p>The Planning and Development Act (2000, as amended) allows Planning Authorities to make provision for the preservation of any tree, trees, group of trees or woodlands by way of a Tree Preservation Order (TPO) where it is carried out in the interest of expediency, amenity or the environment. This is the relevant process for the identification of trees and hedgerows, which is separate to the Development Plan process and it is not considered appropriate or necessary to include an objective in the Draft Plan that seeks to affect this process.</p> <p>There are a total of three TPOs listed in Table 9.5 of the Draft Plan, which are identified on the Development Plan maps. The introductory text in Section 9.5.0 (TPOs) incorrectly refers to a table 9.4 and should be amended accordingly.</p> <p>An additional Proposed Tree Preservation Order is identified under Table 9.6 for Newcastle Road Lucan, which has now been made. It is recommended that the Draft Plan be amended accordingly. Trees not listed under Table 9.5 or 9.6 of the Draft Plan are not subject to a TPO.</p> <p>Recommendation It is recommended the Draft County Development Plan be amended as follows:</p> <ul style="list-style-type: none"> ▪ That the introductory text and tables contained under Section 9.5.0 (Tree Preservation Orders) of the Draft Plan, and the Development Plan Maps, reflect the approval of the TPO for Newcastle Road Lucan and correct reference to Table 9.5. ▪ That HCL 17 Objective 2 (trees, hedgerows and woodlands) of the Draft Plan be relocated to the list of objectives under Policy 15 (non-designated areas) and amend the objective to refer to the need to accord with 'Living with Trees: South Dublin County Council's Tree
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	Management Policy 2015-2020'.
9.6.0 Cultural Heritage	
<p>1. Develop an Irish speaking settlement in Tallaght and include chapter on the Irish Language in the County Development Plan. (DRAFTDEVPLAN0009, Pol O Meadhra, Gaelphobal Thamhlachta, Gaelphobal Thamhlachta)</p>	<p>Chief Executive's Response and Recommendations HCL 18 Objective 2 of the Draft Plan 2016-2022 seeks to promote the Irish Language and favour its use in the promotion of the Villages Initiative. This objective was included in the Draft Plan in response to Motion 319 of the February 2015 County Development Plan meeting, which included a similar proposal to the subject submission and was amended subsequent to the Chief Executive's Response and Recommendation.</p> <p>The designation and establishment of an Irish speaking settlement within the County is beyond the strategic land use function of a Draft Plan and cannot be actioned or achieved through the Draft Plan. Such a proposals could be directed towards the South Dublin Local Economic and Community Plan.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
9.7.0 Sites of Geological Interest	
<p>1. Objection to listing of 6 of 10 geological sites identified under the Geological Heritage Audit by reason of initial screening out of sites under the audit, failure to take on advice of GSI, possibly candidacy of one omitted sites (Belgard Quarry) for NHA status, absence of impact of geological site designation on the operation of quarries, interest in such sites being generated by quarrying activity, the limited impact of designation, absence of presumption in identification of sites that a disused quarry will not recommence operation; geological interest of Belgard Quarry, landmark function of aforementioned quarries; absence of impact on safety of quarries. It is requested that full complement of County Geological Sites be included in the Development Plan. Reference should also be made to the Guidelines on Geological Heritage for the Extraction</p>	<p>Chief Executive's Response and Recommendations In recognition of the importance of geological heritage as an intrinsic component of natural heritage, The Geological Heritage of South Dublin County: An Audit of County Geological Sites in South Dublin County was commissioned under the County Heritage Plan in partnership with the Geological Survey of Ireland and accompanies the Draft Plan 2016-2022. The geological audit identifies 10 sites of county geological interest to be put forward as 'County Geological Sites'. The audit included an initial screening out of other geological sites within the County and it is not considered necessary to investigate further geological sites or features.</p> <p>Four of the 10 identified sites (2 proposed quarries and 2 road cutting) were excluded from the County Geological Sites identified under Draft Plan</p>

<p>Industry. (DRAFTDEVPLAN0137, Matthew Parkes DRAFTDEVPLAN0146, Robert MeehanDRAFTDEVPLAN0196, SARAH GATLEY, Geological Survey of Ireland (Dept.Communications, Energy & Natural Resources))</p> <ol style="list-style-type: none"> 2. Include action that requires the retention of new rock exposures of geological interest that are exposed during the construction of new roads or carriageways. (DRAFTDEVPLAN0196, SARAH GATLEY, Geological Survey of Ireland (Dept.Communications, Energy & Natural Resources)) 3. Objection to listing of 6 of 10 geological sites identified under the Geological Heritage Audit by reason of the significance of the quarries that have been omitted, absence of impact of geological site designation on the operation of quarries, interest in such sites being generated by quarrying activity and the limited impact of designation. It is requested that all four quarries be included as County Geological Sites in the Development Plan. (DRAFTDEVPLAN0211, Vincent Gallagher) 4. Include an objective and associated actions to protect geological features at Cooldrinagh. (DRAFTDEVPLAN0268, Doireann NiCheallaigh, An Taisce) 5. Submitted that an additional paragraph be added to Section 9.7.0 as follows: Council recognises the importance of geological heritage as an intrinsic component of natural heritage. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open) 6. Replace and amend objectives under 9.7.0 to: <ul style="list-style-type: none"> - Identify and protect sites of geological and geomorphological interest and restore the character and conservation value and integrity of these sites including proposed NHA's and sites and areas of geomorphological. - Require proposals to be accompanied by a detailed report setting 	<p>namely the Ballinascorney Quarry, Belgard Quarry, Liffey Valley Centre Road Cuttings and N4 Lucan Cutting.</p> <p>It is accepted from the submissions on the Draft Plan that the identification of quarries and road cuttings as County Geological Sites has minimal impact on the operation of such sites and that their geological interest has been revealed and created by quarrying or road building activities. The status of 'County Geological Site' does not exclude permitted activities either continuing or commencing. It is therefore recommended that all 10 sites be identified as County Geological Sites under Section 9.7 of the Draft Plan and that all 10 sites be mapped on County Development Plan Maps.</p> <p>It is also accepted that the introduction to Section 9.7.0 should be amended to recognise the importance of geological heritage as an intrinsic component of natural heritage and that Section 11.3.8 (Extractive Industries) should also be amended to include reference to the Guidelines on Geological Heritage for the Extraction Industry.</p> <p>HCL Policy 19 of the Draft Plan provides for the maintenance the conservation value and the sustainable management of the County's geological heritage resource. This is strengthened by HCL 19 Objective 1, which seeks to protect designated geological sites from inappropriate development. It is not considered necessary to include additional objectives on the promotion or protection of geological sites or features or to seek to identify other sites other than those that have already been screened or put forward as County Geological sites under the geological audit of the County.</p> <p>HCL Policy 13 Objectives 1 and 2 (Natural Heritage Areas) of the Draft Plan already seeks to ensure that development proposals within or adjacent to pNHAs are sited and designed to minimise impact on biodiversity</p> <p>It is a requirement under Planning and Development Legislation for all developments within the County to be screened for likely significant environmental impacts and to ascertain whether an Environmental Impact Statement is needed. The Planning and Development Regulations 2001 specify mandatory thresholds above which Environmental Impact</p>
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out their potential impact.

- Prohibit development where significant harm is deemed likely.
- Assess all proposed developments that are likely to impact on CGSs.
- Further enhance geodiversity.
- Ensure that any plan or project affecting karst formations or other important geological and geomorphological systems are adequately assessed for their potential geophysical or ecological impacts.
- Support access and public rights of way to geological and geomorphological features and systems of heritage and co-ordinate development of walking routes, trails and other recreational activities in geo parks.
- Encourages and facilitates the development of geo-tourism by conserve and managing geological resources.
- Avoid inappropriate development through consultation with the GSI in advance of proposals which are likely to impact on sites particularly those involving major developments entailing significant ground excavation.

([DRAFTDEVPLAN0498](#), [Roger Garland](#), [Keep Ireland Open](#))

Statements (EIS) are required, setting out the types and scale of development proposals that require EIS. Environmental Impact Statements may also be required for sub threshold developments. The legislative provisions in relation to Environmental Impact Assessment negates the need to insert a parallel requirement for environmental assessment of development on geological heritage under the County Development.

Many of the Geological sites that are currently are located within public parks or are accessible via the Dublin Mountain Way this negating the need to promote access to such sites. The promotion of access including walking trails to working quarries and to roadside cuttings along national roads would be inappropriate and beyond the strategic land use scope of the Draft Plan. Proposals in relation to the development of geo tourism should be directed to the Tourism Strategy.

Rock exposures of geological interest should be retained during the construction of new roads or carriageways where possible and appropriate. Section 2.1.4 of the NRAs Guidance Document ('Guidelines on Procedures for Assessment and Treatment of Geology, Hydrology and Hydrogeology for National Road Schemes') states "*For national road schemes, it is important to ensure that the best and potentially most valuable examples of our geological heritage are preserved and/or recorded, to simultaneously assist us in understanding the Earth's past and predicting its future.*"

Adherence to the NRAs guidance document in relation to this should be carried out.

Recommendation

It is recommended that the Draft County Development Plan be amended as follows:

- Identify all 10 sites of County geological interest, as selected under 'The Geological Heritage of South Dublin County: An Audit of County Geological Sites in South Dublin County', as County Geological Sites under Section 9.7.0 of the Draft Plan and map on Draft Plan Maps accordingly.
- Amend the introduction to Section 9.7.0 to recognise the importance of geological heritage as an intrinsic component of natural heritage.

	<p>Geology is recognised as an intrinsic component of the County's heritage resource, to be protected and promoted for its heritage value and for its potential in educational, scientific, recreational, and geo-tourism initiatives.</p> <ul style="list-style-type: none"> ▪ Amend Section 11.3.8 of the Draft Plan (Extractive Industries) to include reference to the 'Guidelines on Geological Heritage for the Extraction Industry'. ▪ Reference to the NRAs guidance document ('Guidelines on Procedures for Assessment and Treatment of Geology, Hydrology and Hydrogeology for National Road Schemes') in Chapter 11 to be included.
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Chapter 9 Summary of Recommended Amendments to the Draft Plan

Section	Response Issue	Recommendation
9.1.0 Built Heritage and Architectural Conservation	Details and Provisions for Archaeological Heritage	<p>Augment Section 9.1.1 to acknowledge “The Framework and Principles for the Protection of Archaeological Heritage” (1999) as the national policy document on the protection of archaeological heritage.</p> <p>It is recommended that the text in the introduction Chapter 9 of the Draft County Development Plan be amended to acknowledge the benefits of protecting the heritage and landscapes of the County.</p> <p>It is recommended that the following amendments be made:</p> <ul style="list-style-type: none"> ▪ Amend Section 9.1.1 of the Draft Plan to acknowledge “The Framework and Principles for the Protection of Archaeological Heritage” (1999) as the national policy document on the protection of archaeological heritage. ▪ Amend the introduction of Chapter 9 of the Draft Plan to acknowledge the benefits of protecting the heritage and landscapes of the County including Archaeological Heritage. ▪ It should also be stated that the boundary defining Zones/Areas of Archaeological Potential for the Recorded Monuments listed and mapped in the County Development Plan does not necessarily define the full extent of the site or monument and that certain monuments on the RMP that have been deemed to be of national importance or are within the ownership of the state are also designated as National Monuments. ▪ Amend HCL 2 Objective 4 of the Draft Plan to include for the protection of any discovered battlefield sites of significant archaeological potential within the County. ▪ Amend Section 11.5.1 of the Draft Plan to: <ul style="list-style-type: none"> ○ Require new buildings within an Area/Zone of Archaeological Potential to be designed to have minimal impact on archaeological features; ○ Have regard to archaeological concerns when considering proposed infrastructure and roadworks located in close proximity to Recorded Monuments and Places; ○ Require archaeological testing to be carried out as part of an archaeological assessment where it's deemed that a proposed development may have an impact on an archaeological site or monument ○ Require archaeological monitoring to be carried out during the course of development works where it is considered necessary to identify and protect potential archaeological deposits, features or objects. ○ Require full archaeological excavation where it is recommended by the National Monuments Service or any superseding body. ○ Have regard to Emerging Historic Landscape Character Assessments contained within the

		Landscape Character Assessment of South Dublin County 2015 when assessing relevant planning applications.
11.5.1	Built Heritage and Architectural Conservation	<p>Amend Section 11.5.1 to:</p> <ul style="list-style-type: none"> • Require new buildings within an Area/Zone of Archaeological Potential to be designed to have minimal impact on archaeological features; • Have regard to archaeological concerns when considering proposed infrastructure and roadworks located in close proximity to Recorded Monuments and Places; • Require archaeological testing to be carried out as part of an archaeological assessment where it's deemed that a proposed development may have an impact on an archaeological site or monument • Require archaeological monitoring to be carried out during the course of development works where it is considered necessary to identify and protect potential archaeological deposits, features or objects. • Require full archaeological excavation where it is recommended by the National Monuments Service or any superseding body. • Have regard to Emerging Historic Landscape Character Assessments contained within the Landscape Character Assessment of South Dublin County 2015 when assessing relevant planning applications
9.1.0 Built Heritage and Architectural Conservation	Mill Lane ACA and Protected Structures	Amend HCL 4 SLO 1 (Palmerstown Lower Mill Complex ACA) to include for the promotion of the restoration of industrial heritage and mill structures including mill races and expand the exploration of uses mentioned under the SLO to include tourism/outdoor recreation uses.
Table 9.1 & maps	Balrothery Cottages	Amend Plan to designate Balrothery Cottages within an independent ACA. Amend Development Plan Maps and Table 9.1 accordingly.
9.2.0 Landscapes	Views and Prospects	Amend section 11.5.5(ii) of the County Development Plan to clarify that the requirement to carry out Landscape Impact Assessment includes development that could potential impact on designated on views or prospects.
Maps	Views and Prospects	<p>Identify the following views for protection and preservation on Development Plan Maps:</p> <ul style="list-style-type: none"> • Ballinascorney Lane: Views along the entire eastern side of the lane and intermittent views along the western side of the lane. • Ballymaice Lane: Views along the entire eastern side of the lane. • Shankhill Road: Intermittent views along both sides of the road particularly the western side.
9.2.0 Landscapes	Landscape Character	Amend Chapter 9 introduction to acknowledge the benefits of protecting the heritage and landscapes of the County and insert details in relation to the background of the LCA process into 9.2.0.

	Assessment	
9.2.0 Landscapes	Landscape Character Assessment	Amend Section 11.5.5(ii) to support development that enhances existing degraded landscapes and include a need to ensure that development is carefully sited, designed and of an appropriate scale.
9.2.0 Landscapes	Dublin Mountains	Amend HCL 9 Objective 3 to refer to the future expansion of the Wicklow Mountains National Park within South Dublin.
9.2.0 Landscapes	Liffey Valley	Amend HCL 10 Objective 4 to make reference to 'Towards a Liffey Valley Park' (2007) and to promote universal accessibility for all, where environmental and built heritage sensitivities are not negatively impacted.
9.2.0 Landscapes	Dodder Valley	Amend HCL 10 Objective 4 to promote universal accessibility for all, where environmental and built heritage sensitivities are not negatively impacted.
9.4.0 Public Rights of Way and Permissive Access Routes	General	Amend HCL Policy 16 to promote and improve access to high amenity, scenic and recreational areas within adjoining counties.
9.4.0 Public Rights of Way and Permissive Access Routes	Permissive Access Routes	Amend HCL 16 Objective 2 to seek to ensure that Permissive Access Routes do not compromise environmentally sensitive sites.
9.5.0 Tree Preservation Orders	-	Amend introductory text and tables contained under Section 9.5.0 (Tree Preservation Orders) of the Draft County Development Plan together with the Development Plan Maps to reflect the approval of the TPO for Newcastle Road Lucan and correct reference to Table 9.5.
9.3.5	-	Relocate HCL 17 Objective 2 (trees, hedgerows and woodlands) to the list of objectives under Policy 15 (non-designated areas) and amend the objective to refer to the need to accord with 'Living with Trees: South Dublin County Council's Tree Management Policy 2015-2020'.
9.7.0 Sites of Geological Interest		It is recommended that the Draft County Development Plan be amended as follows: <ul style="list-style-type: none"> Identify all 10 sites of County geological interest, as selected under 'The Geological Heritage of South Dublin County: An Audit of County Geological Sites in South Dublin County', as County Geological Sites under

		<p>Section 9.7.0 of the Draft Plan and map on Draft Plan Maps accordingly.</p> <ul style="list-style-type: none"> ▪ Amend the introduction to Section 9.7.0 to recognise the importance of geological heritage as an intrinsic component of natural heritage. Geology is recognised as an intrinsic component of the County's heritage resource, to be protected and promoted for its heritage value and for its potential in educational, scientific, recreational, and geo-tourism initiatives. ▪ Amend Section 11.3.8 of the Draft Plan (Extractive Industries) to include reference to the 'Guidelines on Geological Heritage for the Extraction Industry'. ▪ Reference to the NRAs guidance document ('Guidelines on Procedures for Assessment and Treatment of Geology, Hydrology and Hydrogeology for National Road Schemes') in Chapter 11 to be included.
11.3.8	Sites of Geological Interest	Amend Section 11.3.8 of the Draft County Development Plan (Extractive Industries) to include reference to the 'Guidelines on Geological Heritage for the Extraction Industry'.

CHAPTER - 10 ENERGY

<p>10.1.0</p> <ol style="list-style-type: none"> 1. Draw up and publish Climate Change Adaptation Policy. (DRAFTDEVPLAN0225, Joanna Tuffy, TD - Constituency of Dublin Mid-West) 2. In relation to the 'Energy Performance in new Buildings' section, the submission outlines that the council should seek to ensure that new buildings comply fully with the national building regulations - and with the relevant requirements of EU directives, even where they haven't been correctly transposed into Irish law, as the Department of the Environment accepts to be the case in terms of the energy efficiency requirements for new non-residential buildings. (DRAFTDEVPLAN0266, Jeff Colley, Temple Media Ltd, trading as Passive House Plus (Eco Build & Upgrade)) 	<p>Chief Executive's Response and Recommendation</p> <p>Core Strategy (CS) Policy 8 of the Draft Plan 2016-2022 states: 'It is the policy of the Council to support the implementation of the National Climate Change Strategy and the National Climate Change Adaption Framework Building Resilience to Climate Change 2012 through the County Development Plan and through the preparation of a Climate Change Adaptation Plan in conjunction with all relevant stakeholders.'</p> <p>South Dublin County Council has initiated the compilation of an Adaptation Baseline which will support the preparation of a Countywide Climate Change Adaption Plan, which will be prepared and finalised within the timeframe of the South Dublin County Council Development Plan 2016 – 2022.</p> <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p>
<p>10.2.0 Energy Sources</p> <ol style="list-style-type: none"> 1. Include policy that avoids use and exploration of fossil fuels and places emphasis on reducing energy demand in all buildings. (DRAFTDEVPLAN0212, Doireann Ni Cheallaigh, An Taisce) 2. List of areas for restriction in relation to wind energy should include all of Liffey Valley and should not just restricted to SAAO. (DRAFTDEVPLAN0268, Doireann NiCheallaigh, An Taisce) 3. Given the scale of development envisaged for Grange Castle it is submitted that the 110kV network in the area will require upgrade and the installation of a 220kV substation. It is requested that cognisance of this requirement be included in the Development Plan to support the development of the substation. 	<p>Chief Executive's Response and Recommendation</p> <p><u>Energy Performance in New Buildings</u></p> <p>The energy efficiency and renewable energy requirements for the construction of new residential and non-residential buildings are currently addressed in the Building Regulations Part L (2008 and 2011) and relevant national policy and guidelines. In consideration of the Planning and Development Act 2000 (as amended) and the Planning and Development Amendment Act 2010, it is considered that the function of County Development Plan policies and objectives in this regard, is to support incremental changes to the Building Regulations Part L, national guidelines and other guidance, that may occur by 2020, without duplicating or introducing specific requirements on energy efficiency and renewable energy technologies that may conflict with or impede the implementation of</p>

<p>(DRAFTDEVPLAN0485, David J Byrne, ESB Networks)</p> <p>4. Submission from Eirgrid requests that E Policy 11 (Service Providers) be amended to refer to future network requirements. (DRAFTDEVPLAN0489, Lara Gough, Eirgrid)</p> <p>5. Submission notes that E Policy 12 requires planning applications for Energy and Communication Infrastructure on lands zoned RU, HA-LV, HA-DV and HA-DM to include a 'Visual Assessment' while the zoning matrix requires 'Public Services' on lands zoned HA-LV and HA-DV to be subject to 'landscape impact assessment'. The submission queries whether proposals on lands zoned HA-LV and HA-DV would require visual assessment and landscape impact assessment and also queries what would constitute an acceptable landscape impact assessment. (DRAFTDEVPLAN0489, Lara Gough, Eirgrid)</p> <p>6. Submission from DAHG advises that any proposed hydro electrical projects in the Dodder or any other watercourses will need to take account of protected aquatic species as well as birds and mammals. (DRAFTDEVPLAN0510, Simon Dolan, Department of Arts, Heritage and the Gaeltacht)</p> <p>7. In relation to Section 11.7.2 'Energy Performance in new Buildings', the submission outlines that the scope of the climate change adaptation should be applied to all new buildings. SDCC should specify that all new buildings - including dwellings - should meet the passive house standard or equivalent, where reasonably practicable, excluding categories of buildings exempted from the requirement for BERs by SEAI. Submission proposes the following wording: All new buildings will be required to meet the passive house standard or equivalent, where reasonably practicable. By equivalent we mean approaches supported by robust evidence (such as monitoring studies) to demonstrate their efficacy, with particular regard to indoor air quality, energy performance, comfort,</p>	<p>the Building Regulations on any specific site for development. It is recommended that the Draft Plan 2016-2022 policies and objectives continue to support any future changes to the Building Regulations and national guidance, such as for example, Towards Nearly Zero Energy Buildings in Ireland: Planning for 2020 and Beyond 2012 (DECLG)</p> <p>Having regard to the above, it is considered that the energy performance of existing and new buildings is sufficiently addressed in Energy (E) Policy 3, Energy (E) Policy 4 and Chapter 11 Implementation, of the Draft Plan. Energy (E) Policy 3 promotes high levels of energy conservation, energy efficiency and the use of renewable energy sources in existing buildings. Under Energy (E) Policy 4, the Council aims to ensure that all new development is designed to take account of the impacts of climate change, and that energy efficiency and renewable energy measures are considered in accordance with national building regulations, policy and guidelines. As such it is considered that the Draft Plan adequately addresses the energy performance of existing and new buildings in South Dublin County.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Small Scale Hydro-Electricity Projects</u> The submission from the Department of Arts, Heritage and the Gaeltacht advises that any proposed hydro-electricity projects along the River Dodder or any other watercourses, will need to take account of protected aquatic species as well as birds and mammals. This is considered acceptable. Accordingly, it is recommended that the wording of Energy (E) Policy 8 be amended as follows: 'It is the policy of the Council to encourage the roll-out of small-scale hydroelectric projects on the rivers, watercourses, dams and weirs across the County, where they do not impact negatively on freshwater species (including protected aquatic species), birds and mammals, biodiversity and natural or built heritage features.'</p>
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and the prevention of surface/interstitial condensation. Buildings specifically exempted from BER ratings as defined by SEAI are also exempted from the requirements of this policy.

These requirements are in addition to the statutory requirement to comply fully with Parts A-M of Building Regulations.'

Furthermore, proposed the following supporting text to help define and explain the above proposal:

'Passive House Building Standard In order for a low energy building to be in compliance with the passive house standard it must have:

- a maximum space heating/cooling demand of 15kWh/m2/year and/or a maximum specific heating/cooling load of 10w/m2;
 - an airtightness level of 0.6 air changes per hour measured at 50 Pascals;
 - a maximum primary energy use (including regulated and unregulated energy) of 120 kWh/m2/year;
 - a minimum average operative internal temperature of 20C in the heating season and avoidance of overheating in the summer (not exceeding 25C for 90% of the year);
 - interior surfaces in the habitable space of all external floors, roofs, walls, windows and doors must be designed to remain above 16.5C through the heating season, in order to avoid surface condensation risk;
 - a mechanical ventilation system designed to provide a minimum of 0.3 air changes per hour, to ensure constant fresh air supply.
- Buildings aiming to meet the passive house standard should be designed using Passive House Planning Package (PHPP) software. Design stage PHPP verification page should be submitted with any planning application. Prior to occupation, the final PHPP verification sheet should also be submitted.' ([DRAFTDEVPLAN0266, Jeff Colley, Temple Media Ltd, trading as Passive House Plus \(Eco Build & Upgrade\)](#))

8. Submit that the following additional objectives be added to Section 10.2.7:

1 Identify existing public rights of way and walking routes and prohibit development which would interfere with them and with access to the countryside or recreational amenity.

E8 Objective 1:

To support the roll-out of small-scale hydroelectric projects on the rivers, watercourses, dams and weirs across the County, where projects do not impact negatively on freshwater species (including protected aquatic species), birds and mammals, biodiversity and natural or built heritage features.'

Energy Policy (E) 4 of the Draft Plan 2016-2022 states:

Having regard to the submission from Keeping Ireland Open, these matters are adequately addressed in Chapter 11 Implementation. Section 11.7.4 includes a list of issues which must be addressed in any proposal for a hydro-electricity development in South Dublin County, including 'consider the provisions of the Water Frameworks Directive, Habitats Directive and other environmental, fisheries or built heritage issues'.

Recommendation:

It is recommended that the Draft County Development Plan be amended as follows:

- Amend text of Energy (E) Policy 8 to:
'It is the policy of the Council to encourage the roll-out of small-scale hydroelectric projects on the rivers, watercourses, dams and weirs across the County, where they do not impact negatively on freshwater species (including protected aquatic species) birds and mammals, biodiversity and natural or built heritage features.
- Amend text of E8 Objective 1 to:
To support the roll-out of small-scale hydroelectric projects on the rivers, watercourses, dams and weirs across the County, where projects do not impact negatively on freshwater species (including protected aquatic species) birds and mammals, biodiversity and natural or built heritage features.'

Wind Energy

The areas where wind farm developments will not 'normally be permissible' are shown in Figure 10.4 of the Draft Plan 2016-2022 and are listed in

<p>2 Planning applications shall comply with the DoECLG Guidelines(2006) or any future guidelines. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p> <p>9. In Section 10.2.10, submitted that Objective 1 under Policy 12 be re-positioned in 9.2 Landscape as a proposed additional Objective 3. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p> <p>10. Submitted that Plan include additional sub sections in Energy Chapter: A Hydro Energy Proposed Text: By virtue of their nature proposals for development of hydro- electric schemes are unlikely to be suitable for locations within sites designated for nature conservation. Proposed Objective: Have regard to the impacts of Hydro Energy Schemes on public rights of way and walking routes. Submission outlines that a policy on Hydro Energy be included especially in view of the proposal made in 2009 by the Spirit of Ireland Group about pump storage/hydro schemes. In many schemes the minuscule amount of power produced doesn't compensate for the environmental damage and loss of access rights for recreational users.</p> <p>B Electricity Transmission Text Overhead power lines and ancillary development can frequently detract from visual amenities. Proposed Objectives: -Facilitate the provision of energy networks provided that the undergrounding of lines is considered in the first instance, as part of a detailed consideration and evaluation of all options available in delivering and providing this type of infrastructure. Where development is of a scale that requires approval under the Strategic Infrastructure Act 2006, the applicant shall include as part of the</p>	<p>Section 10.2.7 Wind Energy. Due to significant environmental, heritage, aviation and landscape constraints, wind farm development will not 'normally be permissible' in these areas. The Liffey Valley Special Area Amenity Order area is included in this list of areas.</p> <p>Figure 10.4 of the Draft Plan also shows that the Liffey Valley Special Area Amenity Order area and the remaining area covered by Zoning Objective HA-LV 'to protect and enhance the outstanding character and amenity of the Liffey Valley' comprise an area of non-viable wind speeds and are also located within the 500 metre buffer from residential dwellings. Furthermore, the Wind Energy Sensitivity & Capacity Analysis undertaken as part of the South Dublin Landscape Character Assessment (which accompanies the Draft Plan), concludes that the Liffey Valley Landscape Character Area would be highly sensitive to commercial wind farm development, having regard to a variety of considerations, including key views and vistas, landscape quality and scenic quality. The evidence based wind energy analysis undertaken for the Draft Plan, concludes that there is no realistic or practical potential for economic wind farm developments in South Dublin County, including the Liffey Valley, without having significant and overriding adverse visual and environmental impacts on landscapes. As such it is not considered necessary to extend the list of areas where wind farm developments will not 'normally be permissible' to include the entire HA-LV zoning area.</p> <p>Having regard to the submission from Keeping Ireland Open it is noted that any application for wind energy development in South Dublin County will be assessed having regard to the Wind Energy Development Guidelines for Planning Authorities 2006 (DEHLG) and will have regard to Development Plan policies and objectives with regard to visual amenity, views and prospects, heritage, biodiversity and all related and relevant matters.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
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planning approval/application document, a study by a suitable qualified independent body demonstrating whether the proposal is incorporating the most appropriate technology and method of construction. Seek to locate power lines in non-scenic amenity areas, where possible, having regard to Landscape Sensitivity Rating Assessment. The applicant shall also ensure the planning application involving the siting of power lines and other overhead cables, fully consider the impacts on the landscape, nature conservation, European sites, environmental designations natural environment, National Monuments, archaeology, views of special amenity value and should follow natural features of the environment. Where impacts are inevitable mitigation measures to minimise their obstructiveness must be provided for. In these instances an Appropriate Assessment, a VIA or other ecological assessment will be required. The undergrounding of transmission lines (including existing overhead cables), HV power lines and associated equipment shall be considered firstly as part of a detailed consideration and evaluation of all available options. The development shall be consistent with international best practice that will ensure a safe, secure, reliable, economic, efficient and high quality network. Applications for new transmission lines shall be accompanied by a justification statement of the regional importance of and the need for the proposed development.

-Cognisance will be taken of the Code of Practice between the DoECLG and Eirgrid(2009).

[\(DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open\)](#)

Service Providers and Energy Facilities

It is the spirit of Energy (E) Policy 11 to ensure the adequate provision of energy facilities in association with all relevant stakeholders, including Eirgrid and ESB Networks, providing for both existing and future network requirements, which may include the installation of a 220kV substation to service future development at Grange Castle. It is recommended that the wording of Energy (E) Policy 11 be amended to specifically include the provision of future network requirements, as follows:

'It is the policy of the Council to ensure that the provision of energy facilities is undertaken in association with the appropriate service providers and operators, including ESB Networks, Eirgrid and Gas Networks Ireland. The Council will facilitate the sustainable expansion of existing and future network requirements, in order to ensure satisfactory levels of supply and to minimise constraints for development.'

With regard to the submission from Keeping Ireland Open it is noted that it is the spirit of Energy (E) Policy 11 to facilitate the sustainable expansion of existing and future energy networks, in partnership with a range of relevant stakeholders, including ESB Networks and Eirgrid. Any such development proposals in South Dublin County will also be considered having regard to the Habitats Directive and other environmental and built heritage issues.

With regard to any opportunities for the undergrounding of electricity infrastructure, it is noted IE4 Objective 2 of the Draft Plan states:

'To co-operate with the relevant agencies to facilitate the undergrounding of all electricity, telephone and television cables in urban areas wherever possible, in the interests of visual amenity and public health.'

Where any such developments to be located in South Dublin County are considered under the Strategic Infrastructure Act 2006, the Planning Authority shall make any relevant comments to An Bord Pleanála, as provided for under the Act.

The Code of Practice between the DECLG and Eirgrid 2009 enables Eirgrid to progress with its programme of works within the framework of Government policy, whilst carrying out appropriate archaeological mitigation having regard to a set of principles and actions agreed by both parties, as

	<p>contained in the Code. Any proposal for such development in South Dublin County shall have regard to all relevant legislation, where appropriate, including the National Monuments Acts 1930-2004 and all relevant policies and objectives of the Draft Plan in this regard.</p> <p>Recommendation</p> <p>It is recommended that Energy (E) Policy 11 of the Draft County Development Plan be amended to include:</p> <p>'It is the policy of the Council to ensure that the provision of energy facilities is undertaken in association with the appropriate service providers and operators, including ESB Networks, Eirgrid and Gas Networks Ireland. The Council will facilitate the sustainable expansion of existing and future network requirements, in order to ensure satisfactory levels of supply and to minimise constraints for development.'</p> <p><u>Energy and Communications Infrastructure in Sensitive Landscapes</u></p> <p>The submission from Eirgrid notes that Energy (E) Policy 12 requires planning applications for Energy and Communication Infrastructure on lands zoned RU, HA-LV, HA-DV and HA-DM to include a 'Visual Assessment', whilst the Draft Plan zoning matrix requires that 'Public Services' on lands zoned HA-LV and HA-DV are to be subject to a 'landscape impact assessment'. The submission queries whether proposals on lands zoned HA-LV and HA-DV would require both a visual assessment and landscape impact assessment. For the purposes of clarity and consistency, it is considered that a visual assessment can be contained within a landscape impact assessment and as such the Draft Plan should refer to the requirement of a landscape impact assessment with regard to this policy. As such, it is recommended that the wording of Energy (E) Policy 12 be amended as follows:</p> <p>'It is the policy of the Council that all planning applications for energy and communications infrastructure on lands located in rural, high amenity and mountain areas (Zoning Objectives RU, HA-LV, HA-DV and HA-DM) shall include a Landscape Impact Assessment of the proposed development on the landscape and shall be subject to screening for potential impacts on Natura 2000 sites.'</p>
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	<p>The Eirgrid submission also queries what constitutes an acceptable landscape impact assessment. It is considered that this issue is not relevant to the Development Plan and can be addressed by way of a pre-planning consultation with the Planning Authority (Section 247 of the Planning & Development Act 2000 (as amended) refers), for any relevant proposals for development in South Dublin County.</p> <p>The Code of Practice between the DECLG and Eirgrid 2009 enables Eirgrid to progress with its programme of works within the framework of Government policy, whilst carrying out appropriate archaeological mitigation having regard to a set of principles and actions agreed by both parties, as contained in the Code. Any proposal for such development in South Dublin County shall have regard to all relevant legislation, where appropriate, including the National Monuments Acts 1930-2004 and all relevant policies and objectives of the Draft Plan in this regard.</p> <p>Having regard to the submission from Keeping Ireland Open, it is considered that Energy (E) Policy 12 should not be re-positioned to Section 9.2.0 Landscapes, as this objective specifically addresses the requirements of Energy (E) Policy 12, relating to planning applications for energy developments located in rural, high amenity and mountain areas.</p> <p>Recommendation:</p> <p>It is recommended that Energy (E) Policy 12 of the Draft County Development Plan be amended to:</p> <p>‘It is the policy of the Council that all planning applications for energy and communications infrastructure on lands located in rural, high amenity and mountain areas (Zoning Objectives RU, HA-LV, HA-DV and HA-DM) shall include a Landscape Impact Assessment of the proposed development on the landscape and shall be subject to screening for potential impacts on Natura 2000 sites.’</p>
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Chapter 10 Summary of Recommended Amendments to the Draft Plan

Section	Response Issue	Recommendation
10.2.0	General Small Scale Hydro-Electricity Projects	Amend Energy (E) Policy 8 to It is the policy of the Council to encourage the roll-out of small-scale hydroelectric projects on the rivers, watercourses, dams and weirs across the County, where they do not impact negatively on freshwater species (including protected aquatic species), birds and mammals, biodiversity and natural or built heritage features.
10.2.0	General Small Scale Hydro-Electricity Projects	Amend E8 Objective 1 to To support the roll-out of small-scale hydroelectric projects on the rivers, watercourses, dams and weirs across the County, where projects do not impact negatively on freshwater species (including protected aquatic species), birds and mammals, biodiversity and natural or built heritage features.
10.2.0	Service Providers and Energy Facilities	Amend Energy (E) Policy 11 It is the policy of the Council to ensure that the provision of energy facilities is undertaken in association with the appropriate service providers and operators, including ESB Networks, Eirgrid and Gas Networks Ireland. The Council will facilitate the sustainable expansion of existing and future network requirements, in order to ensure satisfactory levels of supply and to minimise constraints for development.
10.2.0	Energy and Communications Infrastructure in Sensitive Landscapes	Amend Energy (E) Policy 12 to include It is the policy of the Council that all planning applications for energy and communications infrastructure on lands located in rural, high amenity and mountain areas (Zoning Objectives RU, HA-LV, HA-DV and HA-DM) shall include a Landscape Impact Assessment of the proposed development on the landscape and shall be subject to screening for potential impacts on Natura 2000 sites.

CHAPTER 11 - IMPLEMENTATION

11.1.0 Land Use Zoning Objectives	
<ol style="list-style-type: none"> 1. Exclusion of 'Offices greater than 1,000 sq.m' from Permitted in Principle uses under the Enterprise and Employment zoning, and objective to direct people-intensive enterprise and employment uses such as major office developments, ie: less than 1,000sq.m gross floor area (ET1 Objective 6), are too restrictive in Citywest as they do not take existing office campus development in Citywest into account. The lack of flexibility would inhibit the ability to let, assign and sublet space, and to fund and develop new office-style development in Citywest. (DRAFTDEVPLAN0067, Hugh Lynn, Citywest Limited) 2. Submission requests that the Land Use zoning 'RU' - 'To protect and improve rural amenity and to provide for the development of agriculture' be amended to include 'Outdoor Recreation Park' within the 'Open for Consideration' class of uses. (DRAFTDEVPLAN0113, Suzanne McClure, Brock McClure Consultants, Cavvies Ltd) 3. Submission on behalf of Aldi Stores (Ireland) Limited proposes that Shop-Neighbourhood uses should be listed as 'permitted in principle' under the new 'REGEN' zoning objective in order to encourage regeneration on particularly in underutilised areas. It is also noted that Shop-Neighbourhood uses are listed as 'not permitted' under the 'EE' zoning objective of the Draft County Development Plan and that such uses are listed as 'open for consideration' in all employment zones (EP1, 2 and 3) under the current Development Plan. It is requested that such uses be listed as 'open for consideration' or 'permitted in principle' under the 'EE' zoning objective in order to encourage employment in accordance with the zoning objective. (DRAFTDEVPLAN0091, Alan Whelan, O'Connor Whelan, Aldi Stores (Ireland) Limited) 4. Submission on behalf of Roadstone Limited notes that Zoning Objective 	<p>Chief Executive's Response and Recommendation</p> <p>The Chief Executive has carefully considered the issues raised in relation to Land Use Zoning Objectives and provides responses and recommendations under the following subheadings:</p> <ul style="list-style-type: none"> ▪ Offices over 1,000sqm ▪ Enterprise & Employment ▪ High Amenity – Dublin Mountains (HA-DM) ▪ High Amenity – Liffey Valley (HA-LV) ▪ High Amenity – Dodder Valley (HA-DV) ▪ Rural Zoning ▪ Retail ▪ Retail Warehousing ▪ Urban Centres ▪ Non-conforming uses ▪ Schedule 5 – Definition of Land Uses <p><u>Offices over 1000sqm</u></p> <p>A number of submissions received refer to the proposed EE zoning and uses permitted under same, including office uses and floorspace. Table 11.10 in Chapter 11 of the Draft Plan outlines that Offices over 1000sqm are 'open for consideration' in the EE zoning with a caveat that the proposal must be in accordance with Chapter 4 Economic Development & Tourism Policy for Offices over 1,000 sq.m. The primary restriction in Chapter 4 in relation to Offices over 1,000 sqm is outlined in Policy ET1 Objective 6 of the Draft Plan:</p> <p><i>'To direct people intensive enterprise and employment uses such as major office developments (>1,000sq.m gross floor area) into lands zoned 'Town Centre' and 'Regeneration Zones' in Tallaght, lands zoned 'Town Centre' in Clondalkin and also to lands zoned 'District Centre' and 'Enterprise and Employment' subject to their location within 400 metres of a high capacity public transport node (Luas/Rail).'</i></p>

<p>HA-DM (High Amenity - Dublin Mountains) restricts extractive industries above 350m. It is considered that this is overly prescriptive and should be revised so that the restriction does not apply to quarry development that mitigates adverse affects on the landscape and visual amenity. It is also submitted that concrete/asphalt plants in or adjacent to a quarry should be listed as 'open for consideration' under the HA-DM zoning objective.</p> <p>(DRAFTDEVPLAN0151, Aoife Byrne, SLR Consulting, Roadstone Limited)</p> <p>5. Submission on behalf of owner of Fonthill Retail Park notes that the zoning objective for the retail park has been changed in the Draft Plan to 'RW' (Retail Warehousing). The following suggestions are submitted:</p> <ul style="list-style-type: none"> - Consider adding to the uses that are permitted in principle or open for consideration under the 'RW' Zoning Objective to allow social club, sports club, shop-local, shop - major sales outlet and shop neighbourhood uses. - Consider a Specific Local Objectives that will allow flexibility in retail types and formats at Fonthill Retail Park in recognition of its established mixed retail offer. - Amend policy on retail warehousing and the definition of Retail Warehousing to take account of changes to Retail Warehousing formats, markets, scale and types of merchandise including limits to bulky goods. <p>(DRAFTDEVPLAN0195, Brian Maher, Bilfinger GVA, P.K.B. Partnership)</p> <p>6. Submission outlines that Liffey Valley Park Alliance has consistently opposed new or large scale residential development in the Liffey Valley and in accordance with this policy proposes the following amendments to the Draft Plan:</p> <p>Table 11.13 : Zoning 'HA - LV' use 4 classes related to zoning objective.</p> <ol style="list-style-type: none"> 1. Open for consideration: Garden Centre (a); Nursing Home (f, g); Sports Club/Facility (f, g, h); Recreational Facility (f, h) 2. Not Permitted: Boarding Kennels; Traveller Accommodation <p>Submission suggests the creation of an additional condition: h - in</p>	<p>A number of submissions relating to the restrictive nature of ET1 Objective 6 were responded to in Section 4 of this report and the response in Section 4 recommended that people intensive enterprise and employment uses, such as major office developments, be directed to the following area/zones:</p> <ol style="list-style-type: none"> a) Town Centre (TC) and Regeneration (REGEN) zones in Tallaght b) Town Centre (TC) zone in Clondalkin c) lands zoned District Centre (DC), Enterprise and Employment (EE), and Regeneration Zones (REGEN), within <ul style="list-style-type: none"> ▪ 400 metres of a high frequency bus service and/or ▪ within 800 metres walking distance of a Train or Luas station, (requiring demonstration of walking distance) <p>Overall, it is the policy of the Council to direct people intensive enterprise and employment uses such as major office developments to the main urban centres (i.e Tallaght & Clondalkin) to strengthen existing employment centres and to support people intensive enterprise and employment uses in close proximity to quality public transport.</p> <p>The provision of people intensive enterprise and employment uses such as major office developments sporadically to areas not adequately served by public transport within the EE zoning (and other zonings) would undermine the vitality of Tallaght and Clondalkin, encourage unsustainable travel patterns and be contrary to the Regional Planning Guidelines (RPGs).</p> <p>It is considered that the land use zoning tables in the Draft Plan are representative of policies and objectives in the Draft Plan pertaining to specific land use zoning objectives. No amendment to the land use tables in relation to Offices over 1,000sqm is recommended.</p> <p>Recommendation</p> <p>As per Section 4 - Economic Development and Tourism - of this report, it is recommended that the wording of ET1 Objective 6 in Chapter 4 of the Draft Plan be amended.</p>
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<p>accordance with the Council's flora, fauna and ecological policies. This condition should apply to Agriculture in the list of classes 'Open for Consideration'. (DRAFTDEVPLAN0248, Joe Byrne, Liffey Valley Park Alliance)</p> <p>7. Amend land use zoning objective 'EE' (enterprise and employment) to be more specific in terms of the scale and type of uses that are favourable. (DRAFTDEVPLAN0212, Doireann Ni Cheallaigh, An Taisce)</p> <p>8. Submission recommends the retention of the 'EP2' zoning and associated use classes due to its more flexible range of use classes permitted in principle in comparison to the EE zoning (DRAFTDEVPLAN0114, Mr. Jamie Rohan (c/o Stephen M. Purcell, Future Analytics Consulting Ltd.) Rohan Holdings Ltd. (c/o Future Analytics Consulting Ltd.), Rohan Holdings Ltd. (c/o Future Analytics Consulting Ltd.), Rohan Holdings Ltd)</p> <p>9. Extend the requirement to carry out landscape impact assessment and apply 30 metres restriction from river bank to Agriculture, Allotments, Boarding Kennels, Car Park, Cemetery and Traveller Accommodation uses listed under Zoning Objective 'HA - LV'. (DRAFTDEVPLAN0268, Doireann NiCheallaigh, An Taisce)</p> <p>10. Submission relates specifically to the 'Use Classes related to Zoning Objective' and recommends that the Use Class of Sports Club / Facility, Recreational Facility and Camp Site be included in the Open for Consideration category within Zoning Objective 'HA - LV', having regard to their inclusion in tourism-related sections of the Plan referring to high amenity areas. (DRAFTDEVPLAN0175, Shane Cronin, PD Adventure Sports Limited)</p> <p>11. HCL 10 Objective 7 and Section 3.13.0 contradict with the Land Use Zoning Class Tables for HA- LV & HA-DV. The listing of the 'Recreational facility' and 'Sports Club/Facility' as Not Permitted in these zones is contradictory. Submission outlines that while the importance of</p>	<p><u>Enterprise & Employment</u></p> <p>A number of submissions received refer to the proposed EE zoning and uses permitted under same, including office uses and floorspace. The Chief Executive has responded to the Offices over 1,000sqm above. It is the policy of the Council to strengthen existing employment centres and facilitate economic growth by consolidating existing commercial areas. Whilst a range of employment uses are permitted in principle or open for consideration across a range of land-use zonings, the County Development Plan seeks to guide enterprise and employment development to appropriate locations by identifying economic clusters and setting out policies and objectives for the future development of these areas.</p> <p>The land use zoning matrices in the Draft Plan 2016-2022 are representative of policies and objectives in the Draft Plan pertaining to specific land use zoning objectives. The aim of lands subject to zoning objective EE is to provide employment and enterprise related uses and to foster an environment to support same. As such, proposals for the inclusion of uses such as community centres, education uses, and others referenced in submissions received are considered to be inconsistent with the principle of EE zoned lands, and with policies and objectives relating to the proper planning and sustainable development of such lands. Such uses and services would be more appropriately accommodated in consolidation areas and adjacent to exiting residential development, as reflected in land use zoning objectives located within the catchment of residential areas such as Town Centre, District Centre, and Local Centre, under which such uses are generally permitted in principle and open for consideration.</p> <p>With regard to reference to the need to accommodate medium and high density enterprise and employment development on lands well served</p>
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<p>the Liffey Valley and Dodder Valley is appreciated, the prohibition of the development of Sports Club / Facility and Recreational Facility development is considered over-restrictive. It is recommended that the Use Class of 'Sports Club / Facility' and 'Recreational Facility' be included in the Open for Consideration category within Zoning Objective 'HA - LV' and 'HA DV'. (DRAFTDEVPLAN0176, Benny Cullen, Canoeing Ireland)</p> <p>12. To modify the proposed 'RW: To provide for and consolidate retail warehousing' zoning to provide for 'Shop-Neighbourhood' use as open for consideration. (DRAFTDEVPLAN0190, Fintan Morrin, The Planning Partnership, Lidl Ireland GmbH)</p> <p>13. To confirm that non-intensive proposals for 'non conforming uses' be 'permitted in principle' in Section 11.1.1 of the Draft Plan (DRAFTDEVPLAN0190, Fintan Morrin, The Planning Partnership, Lidl Ireland GmbH)</p> <p>14. To confirm that 'ancillary use' would be assessed on the basis of the principal use in terms of land use zoning and the zoning matrix, etc., under Schedule 5: Definition of Use Classes & Zoning Matrix Table of the Draft Plan (DRAFTDEVPLAN0190, Fintan Morrin, The Planning Partnership, Lidl Ireland GmbH)</p> <p>15. This submission relates to lands at the Carmelite Convent, Firhouse Road within the ownership of the Carmelite Sisters. The submission seeks the provision of Housing for Older People on the subject lands and requests that the HA-DV zoning matrix is amended to provide that 'nursing home', 'retirement home', 'housing for older people' and 'residential institution' uses are open for consideration under the 'HA-DV' zoning objective. In the alternative, a specific local objective (SLO) on the subject lands to support the provision of housing for older people on these lands is suggested. (DRAFTDEVPLAN0189, John Tierney, John Spain Associates, Carmelite Sisters)</p>	<p>by public transport, and restrictive nature of objectives under ET Policy 3, it is noted that objectives under ET Policy 3 refer to “low to medium intensity”, with no specific reference to density included. With regard to specific references to the quantum of office floorspace permitted, the proposed amendments to objectives pertaining to ET Policy 1, detailed in Section 4.3.0 above, are noted. The zoning matrix pertaining to enterprise and employment uses under the EE zoning objective, and definition of use classes relating to same detailed under Schedule 5 of the Draft Plan 2016-2022, are considered adequate and appropriate.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>High Amenity – Dublin Mountains (HA-DM)</u> Submissions were received with regard to use classes permitted under the HA-DM zoning objective of the Draft Plan 2016-2022, specifically extractive industries, nursing and retirement homes, and tourism/recreational uses.</p> <p>With regard to extractive industries above the 350 contour, it is noted that the Landscape Character Assessment of South Dublin County (2015) highlights the high value and sensitivity of the Mountain Area. The protection of this landscape and its environment is a priority of this Plan. HCL Policy 9 of the Draft Plan 2016-2022 states that it is the policy of the Council to protect and enhance the visual, recreational, environmental, ecological, geological, archaeological and amenity value of the Dublin Mountains as a key element of the County’s Green Infrastructure network. In addition, ET10 Objective 2 refers to limiting the operation of extractive industry and ancillary uses at environmentally sensitive locations and within areas designated within Zoning Objective ‘HA-DM’, ‘HA-LV’, and ‘HA-DV’ where extraction would prejudice the</p>
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<p>16. Submission seeks the amendment to the classes of use that will provide that nursing homes are 'Open for Consideration' rather than 'Not Permitted' in the HA-DM zone. (DRAFTDEVPLAN0207, Joe Bonner, Joe Bonner Planning, Glen and Sarah Walker)</p> <p>17. Submissions seeks to amendment the matrix of land uses as they apply to lands zoned 'HA (DM)' High Amenity in the Draft Development Plan 2010-2016 in relation to Hotel/Hostel, Restaurant/ Café, Housing for Older People and Retirement Home to accommodate proposed Recreation and Tourism facility including a Boutique Hotel and Angling Venue and a Retirement Village at Brittas. (DRAFTDEVPLAN0250, Joe Bonner, Joe Bonner Planning, Annod Ltd DRAFTDEVPLAN0251, Joe Bonner, Joe Bonner Planning, Annod Ltd DRAFTDEVPLAN0252, Joe Bonner, Joe Bonner Planning, Annod Ltd)</p> <p>18. Submission requests that sporting facilities be considered 'Open for consideration' in the High Amenity Dodder Valley to retain flexibility to allow for sports facilities that do not adversely impact on the Dodder habitat. (DRAFTDEVPLAN0203, Eoin O Cofaigh, McHugh O Cofaigh Architects, David Kennedy)</p> <p>19. Submission refers to an established steel business at Old Lucan Road, Palmerstown. The submission outlines that the provision of the new 'VC' zoning in place of 'LC' on the site and the listing of 'Industry Light' as 'open for consideration' raises concerns that the proposed zoning is not suitable for the established use on the site and may detrimentally impact on the value of the site and the expansion of the business. (DRAFTDEVPLAN0205, Paul O'Connell M.R.I.A.I., Paul O'Connell & Associates, Daniel Kennedy)</p> <p>20. Submission from co-owners of lands at Citywest requests that offices 100 - 1000sqm and offices over 1000 sqm be permitted in principle on</p>	<p>protection of the County's natural and built heritage. In this regard, it is considered that lands above the 350 metre contour are not appropriate for extractive industry, including ancillary structures, by virtue of visual impact, the High Amenity (HA-DM) zoning objective of the Dublin Mountains, and policies and objectives relating to the protection of same detailed in Chapter 9 of the Draft Plan. The zoning matrix pertaining to the HA-DM zoning objective is also considered adequate and appropriate.</p> <p>With regard to nursing and retirement home development, it is noted that H Policy 3 states that it is the policy of the Council to support the provision of accommodation for Older People in established residential and mixed use areas that offer a choice and mix of accommodation types to older people (independent and semi-independent living) within their communities and at locations that are proximate to services and amenities, including pedestrian paths, local shops, parks and public transport. It is considered that the provision of nursing or retirement home uses in the HA-DM zoning would therefore be at variance with policy regarding the location of housing for older people, and policies and objectives relating to the protection of the Dublin Mountains detailed in Chapter 9 of the Draft Plan.</p> <p>With regard to other class uses referred to in submissions received it is noted, and identified in Table 11.12 of the Draft Plan, that Guest House, Hotel/Hostel, Restaurant/Café, and tourism related facilities such as Recreational Facility and Sports Club/Facility are all open for consideration under the HA-DM zoning objective of the Draft Plan, subject to listed restrictions/caveats to ensure the protection of the Dublin Mountain area. Proposals relating to open for consideration uses in the HA-DM zone will be subject to assessment on their merits and compliance with policies and objectives pertaining to the protection of the Dublin Mountain area.</p>
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<p>EE zoned lands to preserve the existing office environment that has been established at Citywest and is currently being developed at Waterside. (DRAFTDEVPLAN0354, Tracy Armstrong, Fenton Associates, Di Waterside Co-ownership)</p> <p>21. Submission from landowner of lands at Newlands Cross (south of N7 and east of Belgard road) outlining that the 'RU' is more restrictive than the former Green Belt zoning. Requests the reinstatement of Open for Consideration of Hospital and Nursing Home in RU zoning and the retention of 'permitted in principle' status of lawn cemeteries. (DRAFTDEVPLAN0388, Tom Walshe, Muir Associates, Therese Properties)</p> <p>22. Submission relates to a 4.9 Ha site to the south of the N7, forming part of a c.5.71 Ha overall landholding at Newlands Cross, facing the Naas Road N7 and to the west of the main M50 Interchange, known as the 'Gateway Site' (former SDS lands), currently accommodating an industrial/logistics facility with ancillary detached warehouse buildings.</p> <p>Submission requests modifications to proposed zoning objective EE, to which the lands are subject, specifically the broadening of uses permissible under proposed zoning objective EE as follows:</p> <ul style="list-style-type: none"> - to allow for medium to high density enterprise and employment development where lands are well served by public transport; not restricted to low to medium density only as under ET3 Objective 1. - to remove restriction on the quantum of floorspace for offices 'permitted in principle' under EE zoning. - to provide greater range of uses 'open for consideration' under EE, such as community centre, conference centre, cultural use, education, education, health centre, hospital, primary health care centre, shop-major sales outlet and shop-neighbourhood, which could provide ancillary elements to employment areas and also provide employment opportunities. on the basis that the EE zoning objective, as currently proposed, does not reflect the potential of the subject lands to facilitate high quality mixed use development at a strategically located site. 	<p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p> <p><u>High Amenity – Liffey Valley (HA-LV)</u></p> <p>A number of submissions were received with regard to use classes permitted under the HA-LV zoning objective of the Draft Plan 2016-2022, including tourism/recreational uses, agriculture, allotments, Traveller accommodation, and car parks.</p> <p>The Liffey Valley is a proposed Natural Heritage Area (pNHA); HCL Policy 13 and associated objectives relates to the protection of same. The Liffey Valley is also subject to a Special Amenity Area Order (SAAO). HCL Policy 10 of the Draft Plan 2016-2022 states that it is the policy of the Council to protect and enhance the visual, recreational, environmental, ecological, geological and amenity value of the Liffey Valley and Dodder Valley, as key elements of the County's Green Infrastructure network. In addition, HCL Policy 14 of the Draft Plan states that it is the policy of the Council to implement the Liffey Valley Special Amenity Area Order (SAAO) and to seek to improve and extend the Liffey Valley Special Amenity Area and to promote its tourism potential. It is noted that the SAAO includes an objective to preserve and enhance the character or special features of the area and objectives to limit development within the SAAO. Section 11.5.5 of the Draft Plan, relating to Implementation, also addresses ecological protection and the assessment of development proposals in high amenity areas and sensitive landscapes.</p> <p>Having regard to the contents of submissions received and provisions of the Draft Plan regarding tourism, including the policies and objectives for Tourism and Leisure under Section 4.5.0, it is considered that 'Recreational Facility' and 'Sports Club/Facility' uses should be included</p>
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<p>(DRAFTDEVPLAN0201, Robert Keran, John Spain Associates, Hibernia REIT Plc DRAFTDEVPLAN0345, John Spain Associates, John Spain Associates, Hibernia REIT Plc)</p>	<p>as 'open for consideration' under the HA-LV zoning objective of the Draft Plan, subject to restriction/caveats regarding their location/premises, scale, assessment of their landscape impact, and set back from the bank of the River Liffey.</p> <p>With regard to other class uses referred to in submissions received it is noted, and identified in Table 11.13 of the Draft Plan, that Agriculture, Allotments and Car Park uses are all open for consideration under the HA-LV zoning objective of the Draft Plan, subject to listed restrictions/caveats to ensure the protection of the Liffey Valley area. Proposals for re-categorising other uses within the HA-LV zoning objective such as Traveller Accommodation, Boarding Kennels and/or changes to the restriction notes of same have been considered and noted. In this regard, it is considered that the zoning matrix pertaining to the HA-LV zoning objective is adequate and appropriate. It is noted that proposals relating to uses in the HA-LV zone will be subject to assessment on their merits and compliance with policies and objectives pertaining to the pNHA, SAAO and protection of the Liffey Valley area.</p> <p>Recommendation</p> <p>It is recommended that Table 11.13 of the Draft County Development Plan relating to the High Amenity Liffey Valley (HA-LV) zoning objective matrix be amended to include 'Recreational Facility' and 'Sports Club/Facility' uses as Open for Consideration, subject to restriction/caveats regarding their location/premises, scale, assessment of their landscape impact, and set back from the bank of the River Liffey.</p> <p><u>High Amenity – Dodder Valley (HA-DV)</u></p> <p>A number of submissions received related to use classes permitted under the HA-DV zoning objective of the Draft Plan 2016-2022, including housing for older people and tourism/recreational uses.</p> <p>The Dodder Valley is a proposed Natural Heritage Area (pNHA); HCL</p>
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	<p>Policy 13 and associated objectives relates to the protection of same. HCL Policy 10 of the Draft Plan 2016-2022 states that it is the policy of the Council to protect and enhance the visual, recreational, environmental, ecological, geological and amenity value of the Liffey Valley and Dodder Valley, as key elements of the County's Green Infrastructure network. Policy HCL10 Objective 6 refers specifically to the key role of the Dodder Valley and the need to support the continued development of the Dodder Valley as a linear park, greenway and an area of special amenity, to include for the completion of the Dodder Green Route along the full length of the Dodder River.</p> <p>With regard to housing for older people, it is noted that H Policy 3 states that it is the policy of the Council to support the provision of accommodation for Older People in established residential and mixed use areas that offer a choice and mix of accommodation types to older people (independent and semi-independent living) within their communities and at locations that are proximate to services and amenities, including pedestrian paths, local shops, parks and public transport. Notwithstanding the context of a particular property or site identified, it is considered that the provision of nursing or retirement home uses in the HA-DV zoning would be at variance with overarching policies regarding the location of housing for older people, and policies and objectives relating to the protection of the Dodder Valley detailed in Chapter 9 of the Draft Plan. The provision of an SLO, as referenced in a submission received, would essentially bypass policy and criteria contained in County Development Plan that sets out to ensure that residential development is assessed from first principles and occurs in appropriate areas of the County.</p> <p>Having regard to the contents of submissions received and provisions of the Draft Plan regarding tourism, including the policies and objectives for Tourism and Leisure under Section 4.5.0, it is considered that 'Recreational Facility' and 'Sports Club/Facility' uses should be included</p>
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	<p>as 'open for consideration' under the HA-DV zoning objective of the Draft Plan, subject to restriction/caveats regarding their location/premises, scale, assessment of their landscape impact, and set back from the bank of the River Dodder.</p> <p>Recommendation</p> <p>It is recommended that Table 11.14 of the Draft County Development Plan relating to the High Amenity Dodder Valley (HA-DV) zoning objective matrix be amended to include 'Recreational Facility' and 'Sports Club/Facility' uses as Open for Consideration, subject to restriction/caveats regarding their location/premises, scale, assessment of their landscape impact, and set back from the bank of the River Dodder.</p> <p><u>Rural Zoning</u></p> <p>The land use zoning objective RU seeks to protect and improve rural amenity, and provide for the development of agriculture.</p> <p>With regard to general open space and recreational uses, it is noted that 'Open Space' is permitted in principle under the RU zoning objective of the Draft Plan 2016-2022, as indicated in Table 11.16 of the Draft Plan. Open Space is defined under Schedule 5 of the Draft Plan 2016-2022 as spaces that are predominantly free from development and have an element of public value or potential public value, which may include water bodies such as rivers, canals, lakes and reservoirs, provide opportunities for sports and recreation, can act as a visual amenity, and comprise passive and active amenity spaces. The zoning matrix pertaining to open space under the RU zoning objective is considered adequate and appropriate.</p> <p>The contents of the submission with regard to Hospital and Nursing Home uses in RU zoned lands is noted. In this regard, it is noted that such developments are ideally located in areas which are accessible by</p>
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	<p>transport links and on sites that can avail of public services, and support the settlements of existing built up/consolidation areas if not located therein, in accordance with Policy H3. Furthermore, the provision of hospitals at rural locations would be in conflict with the Draft Plan, namely the following objectives:</p> <p>C11 Objective 4: To direct healthcare facilities into town, village, district and local centres and to locations that are accessible by public transport, walking and cycling, in the first instance.</p> <p>The zoning matrix pertaining to the RU zoning objective is considered adequate and appropriate in this regard.</p> <p>With regard to cemeteries, it is noted that 'Cemetery' use is permitted in principle under the RU zoning objective of the Draft Plan 2016-2022.</p> <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Retail</u></p> <p>The land use zoning matrices in the Draft Plan 2016-2022 are representative of policies and objectives in the Draft Plan pertaining to specific land use zoning objectives. The Regeneration or 'REGEN' zoning objective has been introduced to support and facilitate the regeneration of underutilised industrial lands that are proximate to town centres and/or public transport nodes for more intensive enterprise and residential led regeneration. The aim of lands subject to zoning objective EE is to provide employment and enterprise related uses and to foster an environment to support same. The aim of lands subject to the retail warehousing or RW zoning objective is to accommodate the consolidation of existing retail warehousing in the County and new retail warehousing floor space in addition to Major Retail Centre (MRC) zoned</p>
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	<p>lands.</p> <p>'Shop-Local' is defined under Schedule 5 of the Draft Plan as a local shop of not more than 100sq.m. that primarily serves a 'walk-in' population and does not generally attract business from outside the local area. 'Shop-Local' use is permitted in principle under zoning objectives EE and REGEN, and open for consideration under RW zoned lands. It is considered that this use class would adequately serve employees in employment, enterprise and retail developments on EE and RW zoned lands.</p> <p>'Shop-Neighbourhood', as defined under Schedule 5 of the Draft Plan 2016-2022, relates to shops larger than a shop local and includes a small supermarket (not exceeding 2,500 sq.m) giving localised service, designed to cater for normal neighbourhood requirements. It is noted that the inclusion of 'Shop-Neighbourhood' as a permissive use on EE zoned lands would therefore be inconsistent with the objective of EE and RW zoned lands. A 'Shop-Neighbourhood' use would be more appropriately accommodated adjacent to existing or new residential development and within the Urban Centres of the County, as reflected in the land use zoning objectives and tables where the use is generally permitted in principle or open for consideration in 'RES', 'RES-N', 'REGEN', 'TC', 'DC', 'VC', 'MRC' and 'LC' zones.</p> <p>In this context, it is noted that 'Shop-Neighbourhood' use is open for consideration under the REGEN zoning objective, with proposals relating to same subject to assessment on their merits and compliance with policies and objectives pertaining to the REGEN zoning objective.</p> <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p>
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	<p><u>Retail Warehousing</u></p> <p>The Retail Planning Guidelines outline that because the number of retail parks has grown substantially over the past decade, reaching saturation point in some areas, leading to vacancy in some cases, and also because of the blurring of the definition of the goods permitted to be sold in these parks, it is appropriate to reassess the impact of such developments. Due to the fact that the range of goods being sold from retail warehouse parks often includes non-bulky durables, there is potential for a detrimental impact on city/town centres as indicated by the increasing numbers of vacant units in urban centres where retail parks exist on the periphery. It also needs to be recognised that many bulky goods stores such as furniture retailers can and are accommodated in city and town centres. For these reasons, in general, a presumption against further development of out-of-town retail parks is recommended; however, the development plan and any relevant retail strategies should identify whether or not there is a need for the provision of additional retail warehouses.</p> <p>The Guidelines outline that if a need for additional bulky format retailing is identified by the development plan, the size and potential location of the additional units should also be specified. Retail Policy 9, the associated objectives and the provision of a 'RW' zoning provides a policy context to accommodate a demand for retail warehousing in the County and cluster such uses to minimise traffic generation in accordance with the Retail Planning Guidelines 2012. Fonthill Retail Park is identified as an established cluster and the 'RW' zoning is intended to consolidate the cluster. It is the view of the Chief Executive that any additional retail warehousing must be carefully assessed in view of the significant levels of recent provision and potential impacts on vitality and viability of centres in the County. The provision of a RW zoning to enable a consolidation of existing facilities provides a framework for carefully assessing the provision elsewhere in the County.</p> <p>The land use zoning table for Retail Warehousing (RW) in the Draft Plan 2016-2022 is representative of the policies and objectives in the Draft</p>
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	<p>Plan which align with the recommendations of the Retail Planning Guidelines. The aim of lands subject to the retail warehousing 'RW' zoning objective is to accommodate the consolidation of existing retail warehousing in the County and new retail warehousing floor space. The submission outlines that the land use classes social club, sports club, shop-local, shop - major sales and shop neighbourhood uses should be considered as permitted in principle.</p> <p>The Chief Executive recommends no amendment based on the following rationale for each:</p> <p>'Shop-Local' is defined under Schedule 5 of the Draft Plan as a local shop of not more than 100sq.m. that primarily serves a 'walk-in' population and does not generally attract business from outside the local area. 'Shop-Local' use is open for consideration under RW zoned lands. It is considered that this use class would adequately serve employees in employment, enterprise and retail developments RW zoned lands.</p> <p>'Shop-Neighbourhood', as defined under Schedule 5 of the Draft Plan 2016-2022, relates to shops larger than a shop local and includes a small supermarket (not exceeding 2,500 sq.m.) giving localised service, designed to cater for normal neighbourhood requirements. It is noted that the inclusion of 'Shop-Neighbourhood' as a permissive use on RW zoned lands would therefore be inconsistent with the objective of RW zoned lands. A 'Shop-Neighbourhood' use would be more appropriately accommodated adjacent to existing or new residential development and within the Urban Centres of the County, as reflected in the land use zoning objectives and tables where the use is generally permitted in principle or open for consideration in 'RES', 'RES-N', 'REGEN', 'TC', 'DC', 'VC', 'MRC' and 'LC' zones.</p> <p>'Shop-Major Sales Outlet', as defined under Schedule 5 of the Draft Plan 2016-2022, relates to superstores in excess of 2,500 sq.m. of net retail area but not greater than 5,000 sq.m net retail area which are larger in scale than neighbourhood shops, or are very specialised and</p>
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	<p>therefore serve a wider area including district centres and town centres. The inclusion of 'Shop-Major Sales Outlet' as a permissive use on RW zoned lands would therefore be inconsistent with the objective of RW zoned lands. This use would be more appropriately accommodated within the Urban Centres of the County, as reflected in the land use zoning objectives and tables.</p> <p>The submission also includes that social club and sports club land uses be reassessed in the Land Use Table for RW (Table 11.11). The Chief Executive considers that these social facilities would be more appropriately accommodated within existing communities and the Urban Centres of the County, as reflected in the land use zoning objectives and tables.</p> <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Urban Centres</u></p> <p>The Village Centre or VC zoning objective of the Draft Plan 2016-2022 was introduced in recognition of the unique historic character of the County's nine traditional villages, with its primary aim to protect and conserve the special character of same, and to provide for enhanced retail and retail services, tourism, residential, commercial, cultural and other uses appropriate to the village context. The submission makes reference to the potential conflict of VC zoning and the 'Industry Light' use class currently operated on a specific site. It is noted that the application of a zoning objective on a site/s does not preclude the existing use of a particular site or property. In addition, the 'Industry-Light' use is open for consideration under the VC zoning objective and any new proposals relating to same will be assessed on their merits.</p>
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	<p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Non-conforming uses</u> The wording of Section 11.1.1(vi) of the Draft Plan 2016-2022 with regard to non-conforming uses, and the intensification of same, is considered adequate and appropriate.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Schedule 5 – Definition of Land Uses</u> 'Ancillary Use' is defined under Schedule 5 of the Draft Plan 2016-2022 as a use which is incidental to the principle use of the premises. Proposals relating to ancillary uses will be assessed as such and on their merits in accordance with relevant policies and objectives of the Draft Plan pertaining to the proposed use/s.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>11.2.0 Place Making and Urban Design</p>	
<p>1. Objection to higher buildings in Tallaght. (DRAFTDEVPLAN0018, Noeleen Fulham)</p> <p>2. Housing and dwelling units should be designed to promote quality. Such as habitable space, ventilation and the use of lasting materials. (DRAFTDEVPLAN0043, Lorraine Hennessey, Balgaddy Working Together Group)</p>	<p>Chief Executive's Response and Recommendation The Chief Executive has carefully considered the issues raised in relation to Place Making and Urban Design and provides responses and recommendations under the following subheadings:</p> <ul style="list-style-type: none"> ▪ Building Heights ▪ Advertising Signs ▪ Views

<ol style="list-style-type: none"> 3. Housing should be designed so that it does not obscure the view of the Dublin Mountains for residents and tourists alike. (DRAFTDEVPLAN0046, Louise Purcell) 4. Requests that there are no more high rise apartments built within the County such as the one at Hunterswood. (DRAFTDEVPLAN0046, Louise Purcell) 5. Request to ensure that developments are built to a high standard and include energy saving solutions. (DRAFTDEVPLAN0062, Patricia Houston) 6. Submission on behalf of digital signage manufacturer supports inclusion of policies on digital signage in the County Development Plan and the inclusion of references that promotes such signage under Section 11.2.8 and Table 11.9. (DRAFTDEVPLAN0089, Matthew McRedmond, Brock McClure Consultants) 7. Submission requests an advertising policy which support the sensitive placement of modern advertising formats with the streetscape and facilitates the placement of premium quality digital displays in appropriate locations. (DRAFTDEVPLAN0116, Julie Mulleady, JCDecaux Ireland Ltd) 8. High density development should not detract from the character of designated areas and should be located in close proximity to existing public transport. Groupings of trees should be excluded from high density development. (DRAFTDEVPLAN0212, Doireann Ni Cheallaigh, An Taisce) 9. Insert objectives that require landmark buildings of 8 storeys or more to be assessed by a panel of 3 architects. Ensure that EIAs are carried out for all high buildings and have regard to climatic effects, shadowing and visual impact. Ensure that energy balance per occupant and increase in 	<ul style="list-style-type: none"> ▪ Housing Standards ▪ Car Parking <p><u>Building Heights</u></p> <p>Development within South Dublin County is generally low rise, and it is recognised in the Draft Plan 2016-2022 that higher or tall buildings are only suited to particular locations and must be sensitively designed.</p> <p>Section 11.2.7 of the Draft Plan 2016-2022 generally seeks to restrict 'Tall Buildings' (those which exceed five storeys) to areas of strategic planning importance such as key nodes, along the main street network and principal open spaces in Town Centres, Regeneration zones and Strategic Development Zones. The location of taller buildings are also required to be identified within an approved Local Area Plans or Planning Scheme.</p> <p>More generally, any proposed building that is greater in height than the prevailing height of the surrounding area will need to be supported by a strong urban design rationale and include a series of transitional measures. Within residential areas all buildings over three storeys are required be accompanied by a site analysis and statement that addresses the impact of the development. The issues that will need to be addressed are included in the Draft Plan are as follows:</p> <ul style="list-style-type: none"> ▪ The prevailing building height in the surrounding area. ▪ The proximity of existing housing - new residential development that adjoins existing one and/or two storey housing (backs or sides onto or faces) shall be no more than two storeys in height, unless a separation distance of 35 metres or greater is achieved. ▪ The formation of a cohesive streetscape pattern – including height and scale of the proposed development in relation to width of the street, or area of open space. ▪ The proximity of any Protected Structures, Architectural Conservation Areas and/or other sensitive development. <p>This provides a comprehensive framework for the assessment of the</p>
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<p>per capita energy height from building height increases are assessed. (DRAFTDEVPLAN0212, Doireann Ni Cheallaigh, An Taisce)</p> <p>10. Requested that the Development Plan include less prescriptive policies on retail signage and that proposals be assessed on a case by case basis. (DRAFTDEVPLAN0188, Robert McLoughlin, Bilfinger GVA, Hines Real Estate Ireland Ltd)</p> <p>11. Submission on behalf of an advertisement media company recommends the inclusion of an advertisement display strategy that supports the placement of advertising within streetscapes and facilities digital displays. It is submitted that this will encourage the consolidation of commercial displays, provide a format for Council messages to be displayed and allow for the placement of advertisements in public areas. (DRAFTDEVPLAN0334, Julie Mulleady, JCDecaux)</p> <p>12. The inability to provide appropriate and sufficient signage due to onerous criteria such as those contained in the Draft Plan would negatively impact the viability of fast food outlets/takeaways, which could result in South Dublin being an unattractive location for commercial operators. In order to ensure that the operational requirements of fast food outlets/takeaways are understood and considered in context, the restrictions contained in Section 11.2.8 and Table 11.19 of the Draft CDP should be omitted in favour of a case by case assessment. (DRAFTDEVPLAN0191, Paul O'Neill, Bilfinger GVA, Yum Restaurants International Ltd.)</p> <p>13. Building heights should be lower at the periphery of developments. (DRAFTDEVPLAN0496, Patrick Leonard, An Taisce)</p> <p>14. Amend the Development Management standards to allow for flexibility in relation to signage and car parking, both of which are important operational requirements of modern retailers. (DRAFTDEVPLAN0206,</p>	<p>proposed height of any development. See also Section 5.1.0 of this report.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p>Advertising Signs Section 11.2.8 of the Draft Plan 2016-2022, 11.2.8 Signage – Advertising, Corporate and Public Information, provides a compressive set of design criteria to ensure a co-ordinated approach is taken to the provision of signage as follows:</p> <ul style="list-style-type: none"> ▪ In general, signs on a building should only advertise goods or services that are associated with the premises and no more than 2 advertising signs should be erected on any elevation. ▪ Signs should generally be limited to the ground floor of a building unless located directly over the entrance to a major commercial or retail building. ▪ Signs should be simple in design and integrate with the architectural language of the building and not obscure any architectural features. ▪ Signs should be proportionate to the scale of the building to which they are attached and sensitive to the surrounding environment. ▪ Signs attached to Protected Structures and in Architectural Conservation Areas should be in keeping with the character of the building and adhere to best practice conservation principles (see Section 11.5.3 Architectural Conservation Areas). ▪ Any sign or associated structure should not create an obstruction to pedestrian or cyclist movement or create a traffic hazard. ▪ Careful consideration should be given to the materials used in the construction of a sign and the methods used to light it. ▪ All signage within the traditional historical villages of the County must be respectful and enhance the historical context of the
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<p>Muirenn Duffy, Bilfinger GVA, Tesco Ireland Ltd.)</p> <p>15. Submission queries whether same density, design and height building guidelines will be implemented equally across Tallaght, Clondalkin and Lucan having regard to their grouping in the same metropolitan category in settlement strategy. (DRAFTDEVPLAN0261, Gerard Stockil, Tallaght Community Council)</p>	<p>Architectural environment of these villages.</p> <p>Table 11.19 provides further guidance in relation to the type of signage which are appropriate within the County and the restrictions which should apply.</p> <p>The Draft Plan recognises that signage, in terms of its form, size, quality and quantity needs to be carefully managed. Failure to do so will result in the proliferation of signs, giving rise to unsightly visual clutter which will detract from the quality of the built environment (particularly in commercial areas).</p> <p>It is agreed that digital signs (such as LCD, LED, plasma or other electronic display area) because of their multi-media and interactive qualities, have the potential to consolidate information and contribute to the vibrancy of the public domain; however restrictions are required in relation to such signs to ensure they do not create disturbance (noise and light projection) or unwanted distraction (road safety).</p> <p>Recommendation</p> <p>It is recommended that Section 11.2.8 of the Draft County Development Plan be amended to include additional standards for Digital and Electronic Signage. Such signage should be limited to town centres and/or large retail precincts. Such signs should make a positive contribution to the public domain, omit no sound, have a minimum dwell period of 30 seconds (with a crossfade), not to result in obtrusive light that will create unacceptable glare (adjusting to environmental conditions), have limited hours of operation (esp. at night), not contain dynamic content (i.e. video) and not constitute a traffic hazard</p> <p><u>Views</u></p> <p>The placement of extensive restrictions on the development of housing on the basis that it would restrict views of the Dublin Mountains would be prohibitive, could potentially inhibit development throughout much of the County and conflicts with the Draft Plan 2016-2022 Core Strategy.</p>
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	<p>The Council through the Development Management process can seek to protect views by restricting heights or framing the layout of development around view corridors. Such views can be identified as part of a Site Analysis process (as required throughout various sections of the Draft Plan), and may be afforded more formal protection within a Local Area Plan or Planning Scheme.</p> <p>Section 9.2.1 of the Draft Plan identifies views that are identified for protection and preservation. Prospects are also identified. These relate to prominent landscapes on areas of special amenity, value or special interest that are widely visible from surrounding areas.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Housing Standards</u> HOUSING (H) Policy 11 Residential Design and Layout states: 'It is the policy of the Council to promote a high quality of design and layout in new residential development and to ensure a high quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development'</p> <p>This is further detailed within the Objective of this Policy, namely: H11 Objective 1: To promote a high quality of design and layout in new residential development and to ensure a high quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development in accordance with the standards set out in Chapter 11 Implementation.</p> <p>H11 Objective 2: To promote new residential developments that take account of energy efficiency and renewable energy opportunities, including solar energy.</p>
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	<p>Chapter 11 of the Draft Plan provides further details as to how these objectives can be met in terms of Energy Efficiency (Section 11.7.2) and Dwelling Standards (Section 11.3.1 (iv)). These standards ensure that all individual dwellings will provide a sufficient minimum level of energy efficiency and personal amenity.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Car Parking</u> With regard to car parking, see Section 11.4.0 below.</p>
<p>11.3.0 Land Use</p>	
<ol style="list-style-type: none"> 1. The requirement for all dwellings to be dual aspects is potentially problematic, inconsistent with other Dublin Authorities and should be removed from the Development Plan. (DRAFTDEVPLAN0122, John Murphy, BMA Planning, Burris Property Company (In Receivership)) 2. Include reference under 11.3.8 (Extractive Industries) to GSI - ICF Guidelines and require consultation with the Geological Survey of Ireland regarding restoration plans for quarries. (DRAFTDEVPLAN0196, SARAH GATLEY, Geological Survey of Ireland (Dept.Communications, Energy & Natural Resources)) 3. Provide for flexibility in meeting development management standards for infill sites and include additional statement within Section 11.3.2 recognising that it may be impractical to meet all development management standards with respect to infill development and that flexibility will be provided for in respect of this provided that existing residential amenity is protected. (DRAFTDEVPLAN0221, Ciara Slattery, New Generation Homes) 	<p>Chief Executives Response and Recommendation The Chief Executive has carefully considered the issues raised in relation to Land Use and provides responses and recommendations under the following subheadings:</p> <ul style="list-style-type: none"> ▪ Infill ▪ Dual Aspect ▪ Balconies ▪ Dwelling Mix ▪ Public Open Space ▪ Residential Standards ▪ Building Heights ▪ Extractive Industry <p><u>Infill</u> Section 11.3.2 – Residential Consolidation of the Draft Plan 2016-2022 provides flexibility in regard to infill development, as follows: ‘Subject to appropriate safeguards to protect residential amenity, reduced open space and car parking standards may be considered for infill development, dwelling sub-division, or where the development is intended for a specific group such as</p>

<p>4. Remove overly prescriptive development standards where they may impact on the deliverability of residential accommodation including:</p> <ul style="list-style-type: none"> - Remove requirement for a 35 metre opposing distance where new residential development adjoins one / two storey existing housing. - Remove requirement to demonstrate need for one bedroom dwellings in favour of a more flexible policy which supports the provision of an appropriate mix of dwelling types within new residential developments. - Allow for single aspect units where a high quality living environment is demonstrated and with regard to specific site characteristics which may not facilitate the provision of dual aspect units. <p>(DRAFTDEVPLAN0221, Ciara Slattery, New Generation Homes)</p> <p>5. Request that the public open space standards for residential development be amended to be based on number of persons/ bedspaces while allowing a default position with regard to the percentages of the development site area as now provided for in the Draft Development Plan. In relation to institutional lands, suggested that a minimum requirement of 25% or a population based criterion as advised above, whichever is greater Request that a flexibility be included to allow for a higher percentage of public open space where there is a deficit in the existing level of provision.</p> <p>(DRAFTDEVPLAN0360, Jim Brogan, Jim Brogan, Dublin GAA County Board)</p> <p>6. Submission notes that apartment balconies should be of adequate size to provide adequate storage and outdoor space, and should ensure privacy through materials of same.</p> <p>(DRAFTDEVPLAN0261, Gerard Stockil, Tallaght Community Council)</p>	<p>older people or students. Public open space provision will be examined in the context of the quality and quantum of private open space and the proximity of a public park. Car parking will be examined in the context of public transport provision and the proximity of services and facilities, such as shops'</p> <p>Section 11.3.1 – Residential also states in relation to privacy: 'Reduced distances will be considered in respect of higher density schemes or compact infill sites where innovative design solutions are used to maintain a high standard of privacy'</p> <p>These provisions were included in recognition that on particular sites it may not be possible to meet the full range of standards contained elsewhere in the Draft Plan due to site specific or more localised constraints.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Dual Aspect</u> Section 11.3.1(vi) Dual Aspect of the Draft Plan 2016-2022 states: 'All dwellings should have dual aspect. Single aspect dwellings will only be considered in exceptional circumstances, where there is significant planning gain elsewhere in the proposal in relation to layout, private amenity space, unit size and orientation to prevent a substandard level of residential amenity for the future occupants'</p> <p>This allows for flexibility where it can be demonstrated that specific site conditions inhibit the creation of dual aspect apartments and/or a high level of amenity is achieved for occupants.</p> <p><u>Balconies</u> Section 11.3.1 (iv) Dwelling Standards, Table 11.21 Minimum Space</p>
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	<p>Standards for Apartments outlines the minimum area of Private Open Space required individual apartments. This will predominantly be provided in the form of balconies. The minimum standard ensures that adequate storage and outdoor space is provided.</p> <p>With regard to privacy H15 Objective 4 states: ‘To ensure that opposing balconies and windows at above ground floor level have an adequate separation distance, design or positioning to safeguard privacy without compromising internal residential amenity’</p> <p>Section 11.3.1 (v) Privacy also states: ‘A separation distance of 22 metres should generally be provided between directly opposing above ground floor windows to maintain privacy’</p> <p>This ensures that adequate separation distances between opposing buildings is achieved and that a range of design measure are undertaken to reduce overlooking, where required.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Dwelling Mix</u> Section 11.3.1(i) of the Draft Plan 2016-2022 in relation to Mix of Dwellings states that a ‘balanced range of dwelling types and sizes’ are provided within any given development. Where one bedroom dwellings are proposed, ‘with ‘the exception of student accommodation’, these will be limited 10% of the proposed dwellings unless it can demonstrated that there is a ‘need for such accommodation, based on local demand and the demographic profile of the area’. This approach is consistent with the Sustainable Urban Housing: Design Standards for New Apartments (DoEHLG, 2007), which state: ‘it is recommended that the development plan or local area plan</p>
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	<p>should place an upper limit on the proportion of one-bedroom units to be included in apartment schemes (save in exceptional cases, such as student accommodation), because of their incapacity to cater for families'</p> <p>This approach will ensure that an appropriate mix of dwellings are provided which can accommodate a range of needs for the population of SDCC. Where it is shown that a higher proportion of one bedroom dwellings are required, the Draft Plan offers a sufficient degree of flexibility to accommodate this need.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Public Open Space</u> The Draft Plan requires public open space to be provided at the rate of: 14% of the total site area for Zoning Objective RES-N Or 10% of the total site area in all other zones for new residential development. Or 20% on institutional lands to maintain an open setting.</p> <p>This approach has been consistently applied through successive County Development Plans. This is the preferred approach as it provides for a degree of equity between landholdings. There is a concern that should open space requirements be based on the quantum of development, it could discourage the development of medium to higher densities, due to the increases open space requirements. This approach may require an increase in building heights in order to meet minimum density requirements.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be</p>
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	<p>amended.</p> <p><u>Residential Standards</u> It is considered that the standards set out in Section 11.3.1 of the Draft Plan 2016-2022 which address (i) Mix of Dwelling Types, (ii) Residential Density, (iii) Public Open Space / Children's Play, (iv) Dwelling Standards, (v) Privacy, (vi) Dual Aspect, (vii) Access Cores and Communal Areas and (viii) Clothes Drying Facilities provides sufficient flexibility to ensure the deliverability of residential accommodation. Standards in Section 11.3.2 of the Draft Plan with regards (i) Infill Sites, (ii) Corner/Side Garden Sites, (iii) Backland Development and (iv) Dwelling Sub-Division And Upper Floors are also set out.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Building Heights</u> With regard to building height, see Section 11.2.0 above.</p> <p><u>Extractive Industry</u> It is noted that the a submission requests the inclusion of a reference under 11.3.8 (Extractive Industries) to GSI - ICF Guidelines and require consultation with the Geological Survey of Ireland regarding restoration plans for quarries. The Chief Executive agrees.</p> <p>Recommendation It is recommended that Section 11.3.8 of the Draft Plan be amended to include reference to relevant national guidance on quarries and ancillary activities.</p>
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11.4.0 Transport and Mobility	
<ol style="list-style-type: none"> 1. Reduction in allowable car parking for offices near a Luas line would restrict the competitiveness of the Citywest campus/business park for office development. Recommendation that car parking requirements be increased to 1 space per 25sq.m or, at a minimum, car parking allowances for office development be maintained as under the current Plan. (DRAFTDEVPLAN0067, Hugh Lynn, Citywest Limited) 2. The Draft Development Plan applies an 800 metre radius from the Luas in determining areas for reduced car parking. A survey of employees in Citywest indicates that 15.7% of staff live within a catchment area of the Luas and 9.6% take the Luas leaving 85% of employees that drive and have no viable alternative. The imposition of a 33% reduction for car parking for future buildings and tenants will make it difficult to develop and market Citywest. (DRAFTDEVPLAN0119, Hugh Lynn, Citywest Limited) 3. In order to meet the targets of the Governments Electric Transport Programme, ESB advises that support for the roll out of EV infrastructure should be strengthened through parking standards that require the provision of at least one EV charging point with associated signage for developments that include public and private parking. (DRAFTDEVPLAN0150, Colm Cummins, Electricity Supply Board (ESB)) 4. NTA recommends that an objective be inserted that requires all new schools and extended schools to monitor and implement school travel plans by way of condition. (DRAFTDEVPLAN0209, Tadhg MacNamara, National Transport Authority) 5. NTA recommends to remove distinction between long terms and short stay cycle parking for schools and that policy be inserted that requires applications of a certain scale to demonstrate the rationale for the 	<p>Chief Executives Response and Recommendation</p> <p>The Chief Executive has carefully considered the issues raised in relation to Transport and Mobility and provides responses and recommendations under the following subheadings:</p> <ul style="list-style-type: none"> ▪ Car Parking Rates ▪ Retail Parking ▪ Travel Plans ▪ Surface Parking ▪ Bus Parking ▪ Bicycle Parking ▪ Parking for Electric Cars <p><u>Car Parking Rates</u></p> <p>There is a long established link between the availability of parking (in particular free parking), car ownership and car use. This raises concerns that the application of more generous parking rates will result in increased traffic congestion throughout the network. The implications for the sustainable development of the County are noted in Section 6.1.0 of the Draft Plan 2016-2022 as follows:</p> <p>‘if current trends continue, congestion will increase, transport emissions will grow, economic competitiveness will suffer and quality of life will decline’</p> <p>The implications of increase growth in car use for the broader metropolitan area are also addressed in the Draft Transport Strategy for the Greater Dublin Area:</p> <p>‘With renewed economic growth and increased disposable income in the medium to long-term, the level of car ownership in the GDA is expected to experience a further increase, toward saturation ownership levels, particularly in the more car-dependent outer counties’</p> <p>The Draft Transport Strategy also notes that the ‘availability of car parking at trip origins and destinations’ has been a key contributor to the</p>

<p>application of maximum parking standards particularly for those in Zone 2 given that these standards should not be viewed as a target. (DRAFTDEVPLAN0209, Tadhg MacNamara, National Transport Authority)</p> <p>6. NTA recommends that areas to which Zone 2 parking requirement apply be mapped. (DRAFTDEVPLAN0209, Tadhg MacNamara, National Transport Authority)</p> <p>7. Reduction in allowable car parking for offices near a QBC or Luas line, particularly in Zone 2 areas as proposed under the Plan, would restrict the competitiveness of the Citywest campus/business park for office development. Recommendation that car parking requirements be increased to 1 space per 25sq.m or, at a minimum, car parking allowances for office development be maintained as under the current Plan. (DRAFTDEVPLAN0277, Hugh Lynn, Davy Hickey Properties, Citywest)</p> <p>8. Requested that the Development Plan confirm that the car parking standards for all land uses within the retail and retail service category of Table 11.23 are based on gross floor areas. Requested that the Development include less prescriptive policies on car parking design and management and that commercial developments be assessed on a case by case basis. (DRAFTDEVPLAN0188, Robert McLoughlin, Bilfinger GVA, Hines Real Estate Ireland Ltd)</p> <p>9. Bicycle parking standards under 11.4.1 should requires the provision of secure 'sheffield type' stands that prevent theft and are provided with adequate spacing for parking. (DRAFTDEVPLAN0336, Mairead Forsythe, Dublin Cycling Campaign DRAFTDEVPLAN0222, Mairead Forsythe, Dublin Cycling Campaign)</p> <p>10. A specific car parking standard of 1:15 should be considered for 'Retail - Convenience' in all locations, including Zone 2 and the essential nature</p>	<p>recent increases in car use'.</p> <p>The approach taken within the Draft Plan seeks to provide a balanced approach that takes into account the need to promote greater use of sustainable modes whilst making provision for the number of spaces that are reasonably needed to service a development. TM Policy 7 Car Parking states:</p> <p style="padding-left: 40px;">'It is the policy of Council to take a balanced approach to the provision of car parking with the aim of meeting the needs of businesses and communities whilst promoting a transition towards more sustainable forms of transportation'</p> <p>This policy is implemented via a two-tier approach to parking standards.</p> <ul style="list-style-type: none"> ▪ Zone 1: General rate applicable throughout the County. ▪ Zone 2 (Non Residential): More restrictive rates for applications within town and village centres, within 800 metres of a Train or Luas station and within 400 metres of a high quality bus service (including proposed services that have proceeded to construction). ▪ Zone 2 (Residential): More restrictive rates for applications within town and village centres, within 400 metres of a high quality public transport service 5 (includes a train station, Luas station or bus stop with a high quality service)'. <p>It should be noted that Zone 2 has not been mapped as the zone is likely to continuously evolve as new services come on-line.</p> <p>The rates applied to each land use where devised with regard to the current Plan 2010-2016, NTA Guidelines and the rates applied within adjacent metropolitan local authorities (Dun Laoghaire Co. Co., Fingal Co. Co. and Dublin City Council). With regard to the later, this was also to ensure that the proposed rates were not anti-competitive.</p> <p>All rates are applied as a maximum, however as noted within the Draft Plan, the maximum provision should not be viewed as a target and a lower rate of parking may be warranted subject to the range of services</p>
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<p>of convenience led retail should be recognised in relation to proposals for payment systems in car parks. Retail developments located in the urban centres identified in the Draft CDP should not be subject to payment systems. Request that the term 'parking courts' is clarified and that the restrictions on surface parking, both in terms of scale and location, are omitted from the CDP in favour of a case by case assessment of car parking provision based on site characteristics. (DRAFTDEVPLAN0206, Muirenn Duffy, Bilfinger GVA, Tesco Ireland Ltd.)</p> <p>11. Submission requests retention of the car parking standards for hospitals outlined in the current Development Plan, i.e. car parking for hospitals to be determined by the planning authority, on the basis that the proposed maximum standards introduced in the Draft Plan are too low and will lead to greater levels of unauthorised car parking, congestion and traffic hazard. (DRAFTDEVPLAN0187, Alan Whelan, O'Connor Whelan, Hermitage Medical Clinic)</p> <p>12. Submission from co-owners of lands at Citywest requests that maximum car parking standards for office use be at a rate of 1 per 25sqm GFA in Zone 1 and 1 per 4-sqm GFA in Zone 2 to preserve the existing office environment that has been established at Citywest and is currently being developed at Waterside. (DRAFTDEVPLAN0354, Tracy Armstrong, Fenton Associates, Di Waterside Co-ownership)</p> <p>13. Requests provision in the Plan for the offsetting of car parking spaces for pitches and clubhouses as the spaces would have a dual function. (DRAFTDEVPLAN0360, Jim Brogan, Jim Brogan, Dublin GAA County Board)</p> <p>14. Requests bus parking provision for new playing pitches. (DRAFTDEVPLAN0360, Jim Brogan, Jim Brogan, Dublin GAA County Board)</p> <p>15. Submission requests that the car parking standards for playing pitches be seen as a minimum standard and that provision should be made for</p>	<p>(and housing) available in the nearby area.</p> <p>It should be noted that where parking standards within the current Plan 2010-2016 are also applied as a maximum rate in areas that are well served by public transport or alternative means of access. As such the approach proposed within the Draft Plan is not likely to differ significantly in practice from that of the current development plan.</p> <p>For example the current Plan 2010-2016, 'Office' use are required to provide a minimum of 1 space per 40 sq.m, however Policy T34 states: 'It is the policy of the Council that in areas well served by public transport or alternative means of access the car parking standards provided in the Development Plan shall be taken to be the maximum provision required. In other areas less well served they shall be taken to be a minimum provision required'</p> <p>For Office within the Draft Plan the proposed a maximum of spaces are</p> <ul style="list-style-type: none"> ▪ 1 per 50 sq.m. (Zone 2) ▪ 1 per 75 sq.m. (Zone 1) <p>The minimum rate of 1 per 25sqm proposed in submissions received represents a 60% increase from the current Plan 2010-2016. This would conflict with TM Policy 7 Car Parking (as noted above) and would also conflict with:</p> <p>(TM) Policy 1 Overarching: It is the policy of the Council to promote the sustainable development of the County through the creation of an integrated transport network that services the needs of communities and businesses.</p> <p>(TM) Policy 2 Public Transport: It is the policy of the Council to promote the sustainable development of the County by supporting and guiding national agencies in delivering major improvements to the public transport network and to ensure existing and planned public transport services provide an</p>
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<p>overspill parking to minimise the incidence of overspill car parking arising in nearby residential areas. (DRAFTDEVPLAN0360, Jim Brogan, Jim Brogan, Dublin GAA County Board)</p> <p>16. Submission relates to A 4.9 Ha site to the south of the N7, forming part of a c.5.71 Ha overall landholding at Newlands Cross, facing the Naas Road N7 and to the west of the main M50 Interchange, known as the 'Gateway Site' (former SDS lands), currently accommodating an industrial/logistics facility with ancillary detached warehouse buildings.</p> <p>Submission requests modifications to car parking space requirements for office developments on the basis that appropriate flexibility should be afforded to car parking provision on EE zoned lands to reflect the varying nature of development that may occur on such lands, and to ensure that specific potential occupiers/end users who may generally require higher quantum of car parking are not deterred from locating in the County. Submission notes that such flexibility will assist with delivering appropriate future development on the strategically located subject lands and the wider Newlands Cross and Naas Road corridor lands. (DRAFTDEVPLAN0201, Robert Keran, John Spain Associates, Hibernia REIT Plc DRAFTDEVPLAN0345, John Spain Associates, John Spain Associates, Hibernia REIT Plc)</p>	<p>attractive and convenient alternative to the car.</p> <p>(TM) Policy 5 Traffic and Transport Management: It is the policy of Council to effectively manage and minimise the impacts of traffic within the County</p> <p>(TM) Policy 7 Car Parking: It is the policy of Council to take a balanced approach to the provision of car parking with the aim of meeting the needs of businesses and communities whilst promoting a transition towards more sustainable forms of transportation.</p> <p>With regard to Citywest it is noted that the area is served by the Luas red line and the 77a (which provides a frequent bus service). It is also noted the analysis of Census 2011 showed that the origin of trips to work in the Tallaght-Fettercairn ED (i.e. Citywest) were greatest from within the ED and the ED to the immediate south (Tallaght-Jobstown). As such a substantial proportion of the working population is able to commute via foot, bicycle and/or frequent public transport services.</p> <p>The provisions for car parking for hospital use as set out in Table 11.23 of the Draft Plan are considered acceptable and consistent with normal practise. Table 11.23 shows maximum parking rates (non-residential) gross floor area (gfa).</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p>Retail Parking Car parking rates for convenience retailing is contained within Table 11.23 (Maximum Parking Rates) at the rate of 1 space per 15 sq.m. (zone 1) and 1 space per 25 sq.m. (zone 2).</p> <p>As noted above, in relation to Car Parking Standards, the availability of</p>
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	<p>car parking at trip origins and destinations has been a key contributor to the recent increases in car use. In order to effectively manage level of traffic throughout the County and ensure that public transport is a complete option, it is necessary to ensure that payment systems are put in place around areas of major retail activity. Furthermore, Section 6.4.1(l) Management of Public Parking notes that:</p> <p>‘Pay and Display Parking currently operates within the town/village centres of Clondalkin, Lucan, Palmerstown, Rathcoole, Rathfarnham, Templeogue and Tallaght’.</p> <p>And</p> <p>‘Payment systems will be required in car parks associated with major shopping centres and other large commercial developments where new facilities or major extensions to existing facilities are proposed. This will ensure the efficient turnover of parking in such developments, and allow urban centres and public transport to compete with ‘out of town’ centres on a more equitable basis’</p> <p>These policies ensure that parking is provided for retail development in a sustainable and equitable manner.</p> <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Travel Plans</u></p> <p>One of the Actions listed under (TM) Policy 5 Traffic and Transport Management of the Draft Plan is to:</p> <p>‘Require all major traffic generating development to submit a Mobility Management Plan/Workforce Plan and/or Traffic and Transport Assessment’</p> <p>The requirements for these plans are outlined further in Section 11.4.6 of the Draft Plan. Table 11.25 of the Draft Plan outlines the thresholds</p>
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	<p>for the submission of a Workplace Plan. It is agreed that all new schools (and major extensions to schools) should be required to submit a travel plan. The NTA has also produced a Toolkit for School Travel for further information on School Travel Plans.</p> <p>Recommendation It is recommended that an additional requirements be added to Section 11.4.6 of the Draft County Development Plan for the submission of a school travel plans for all new schools (and major extensions).</p> <p><u>Surface Parking</u> Large areas of surface parking dominate the urban landscape and are a major obstacle to successful place making. They may also inhibit access to development for more vulnerable users. Where large amounts of car parking are required, Section 11.4.4 - Car Parking Design and Layout seeks to ensure this is placed either in well-designed Parking Courts, Multi-Storey Car Parks or within Basements.</p> <p>With regard to Parking Courts Section 11.4.4 of the Draft Plan states: ‘To ensure surface parking does not dominate the urban landscape parking courts, that are highly visible from the public domain, should be restricted in size (with no more than 40 spaces per court) and well landscaped. Where larger areas of surface parking are proposed they should be located behind buildings, and/or in the centre of blocks, so that they are obscured from view’</p> <p>Further details in regard to the design of all parking areas can also be found in the Design Manual for urban Roads and Streets (2013) and Urban Design Manual (2009).</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
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	<p><u>Bus Parking</u></p> <p>The current Plan 2010-2016 does not include specific requirements for bus parking at playing fields (pitches) throughout the County. The closest comparable land use is 'stadium'. The requirement to provide coach parking is only considered where there is seating for 500 spectators (see Table 11.23: Maximum Parking Rates). It is accepted that bus parking is desirable at many of these locations to reduce the number of car borne trips; this should be applied at a rate of one per pitch (i.e. to cater for away teams). The maximum parking rate should also be reduced where bus parking is provided.</p> <p>Recommendation</p> <p>It is recommended that Table 11.23 of the Draft County Development Plan be amended to require bus parking for pitches at the rate of 1 per pitch, with a subsequent reduction in car parking.</p> <p><u>Bicycle Parking</u></p> <p>Table 11.22: Minimum Bicycle Parking Rates of the Draft Plan 2016-2022 requires the following for schools</p> <ul style="list-style-type: none"> ▪ Primary Schools, 1 per 5 staff (long term) and 1 per 5 students (short term) ▪ Post Primary Schools, 1 per 5 staff (long term) and 1 per 2 students (short term) <p>It is agreed that all parking for students should also be classified as long term so that it is provided within a secure facility.</p> <p>Section 11.4.1 bicycle Parking Standards, also states that bicycle parking spaces shall be designed in accordance with the requirements of the National Cycle Manual, NTA (2011). This includes a range of secure parking solutions, including Sheffield Stands.</p> <p>Recommendation</p> <p>It is recommended that the Draft County Development be amended to</p>
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	<p>specify that all bicycle parking requirements for schools be classified as long term.</p> <p><u>Parking for Electric Cars</u> Section 11.4.3 of the Draft Plan 2016-2022 requires that non-residential developments provide facilities for the charging of battery operated cars at a rate of up to 10% of the total car parking spaces. Furthermore the remainder of the parking spaces should be constructed to be capable of accommodating future charging points, as required.</p> <p>With regard to residential developments, it is recommended developments should provide dedicated facilities for the charging of battery operated cars at a rate of up to 10% of the total car parking spaces. It is recommended that the Draft Plan be amended in this regard.</p> <p>Recommendation It is recommended that Section 11.4.3 of the Draft County Development Plan be amended to include reference to the provision of dedicated facilities for the charging of battery operated cars at a rate of up to 10% of the total car parking spaces in residential developments.</p>
11.5.0 Heritage & Landscape	
<p>1. Submitted that Section 11.5.1 be replaced with a requirement for the following:</p> <ul style="list-style-type: none"> - An Archaeological Impact Assessment and Method Statement to be carried out prior to the commencement of any activity in respect of development that may have a significant effect in areas in or adjacent to a Recorded Monument or other archaeological heritage or within a zone of archaeological potential . - A qualified archaeologist to carry out the necessary archaeological work as a condition on development with consideration of the preservation of all or part of the archaeological remains. - Archaeological assessments to establish the extent of archaeological 	<p>Chief Executive's Response and Recommendations The Chief Executive has carefully considered the issues raised in relation to Heritage & Landscape and provides responses and recommendations under the following subheadings:</p> <ul style="list-style-type: none"> ▪ Archaeological Heritage ▪ High Amenity and Sensitive Landscapes ▪ Fencing ▪ Rights of Way ▪ Noise Generating Sports <p><u>Archaeological Heritage</u></p>

<p>material associated with the monument or site and ensure that development is designed to avoid or minimise any potential effects on archaeological heritage.</p> <ul style="list-style-type: none"> - Ceding of monuments or site incorporated into a development to Local Authority Ownership. - Development within or adjacent to features of historic and archaeological interest to respect the character of the site and its settings. - Permission for development to only be considered where development is acceptable and prevents adverse impact on the monument and/or its settings. - The strict control of development proposals on unzoned lands which may detract from an area, site, structure or monument. - Assessment of developments which may impact on a national or recorded monument, the designated zone of archaeological importance surrounding any monument or other site of archaeological significance. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open) <p>2. Submitted that Section 11.5.5 (ii- High Amenity Areas) be replaced with a requirement for:</p> <ul style="list-style-type: none"> - Considerable care in relation to the location, design and siting of development in areas of medium to exceptional landscape values and in uplands and river valleys; - A requirement to prepare a visual impact and landscape assessments from appropriate viewing points and to include an evaluation of the visibility and prominence of the proposal where proposed development may have a significant and adverse effect on landscape character or scenic views to include details of alternative sites that were considered - Proposals to demonstrate that the landscape impacts have been anticipated and avoided to a level consistent with its sensitivity. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open) <p>3. Submitted that Section 11.5.5 (iii - Fencing) should be amended to include a presumption against wire fencing particularly barbed wire fencing and that all fencing should not impinge on access for hill walkers. It is also indicated that there should be a presumption against fencing that is not essential to the viability of a farm.</p>	<p>Further to the suggested inclusion of further details in relation to archaeological heritage in the Draft Plan 2016-2022 it is advised that the “Framework and Principles for the Protection of Archaeological Heritage” (1999) and the National Monuments Act have been utilised to inform the policies, objectives and standards of the Draft Plan 2016-2022.</p> <p>Section 11.5.1 (Archaeological Heritage) of the Draft Plan states that archaeological sites shall accord with aforementioned guidelines and shall be designed to have minimal impact on archaeological features. It is also a requirement for Archaeological Impact Assessments, Method Statements, visual impact assessment and Conservation Plans to support development proposals that have the potential to impact on archaeological features, sites or monuments.</p> <p>Further to responses to submission under Chapter 9 (Heritage Conservation and Landscapes) it is accepted that Section 9.1.1 (Built Heritage and Architectural Conservation) of the Draft Plan should be augmented to state that the defined boundary of Zones/Areas of Archaeological Potential for the Recorded Monuments listed and mapped in the County Development Plan do not necessarily define the full extent of the site or monument.</p> <p>Section 11.5.1 of the Draft Plan should also be amended in respect of Archaeological Heritage as set out in the Recommendation below.</p> <p>The ceding of sites to the Local Authority is beyond the strategic land use, budgetary and planning functions of the County Development Plan.</p> <p>Recommendation</p> <p>It is recommended that the Draft County Development Plan be amended as follows:</p> <ul style="list-style-type: none"> ▪ Amend the introduction of Chapter 9 to state the boundary defining Zones/Areas of Archaeological Potential for the for the Recorded Monuments listed and mapped in the County Development Plan does not necessarily define the full extent of
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<p>(DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p> <p>4. Submitted that additional sub sections be added to Chapter 11: A Golf Courses Ensure that golf course development does not impinge on existing public rights of way or walking routes by identifying them prior to development.</p> <p>B Motor Bikes and Quads Development proposals for Noise Generating Sports will not normally be permitted unless there is no conflict with the enjoyment of areas used for informal recreation. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p>	<p>the site or monument.</p> <ul style="list-style-type: none"> ▪ Amend Section 11.5.1 to: <ul style="list-style-type: none"> ○ Require new buildings within an Area/Zone of Archaeological Potential to be designed to have minimal impact on archaeological features; ○ Have regard to archaeological concerns when considering proposed infrastructure and roadworks located in close proximity to Recorded Monuments and Places; ○ Require archaeological testing to be carried out as part of an archaeological assessment where it's deemed that a proposed development may have an impact on an archaeological site or monument ○ Require archaeological monitoring to be carried out during the course of development works where it is considered necessary to identify and protect potential archaeological deposits, features or objects. ○ Require full archaeological excavation where it is recommended by the National Monuments Service or any superseding body. ○ Have regard to Emerging Historic Landscape Character Assessments contained within the "Landscape Character Assessment of South Dublin County" (2015) when assessing relevant planning applications. <p>(Replicated from Section 9 above)</p> <p><u>High Amenity and Sensitive Landscapes</u> The introduction to the Landscape's Section under Section 9.2.0 includes a strong policy response (HCL Policy 7) to preserve and enhance the character of the County's landscapes particularly areas that have been deemed to have a medium to high Landscape Value or medium to high Landscape Sensitivity and to ensure that landscape considerations are an important factor in the management of development. This is followed by HCL 7 Objective 1 and 2, which seeks to ensure that development is assessed against Landscape Character, Landscape Value and Landscape Sensitivity and protect and enhance</p>
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	<p>the landscape character of the County.</p> <p>Section 11.5.5 of the Draft Plan already requires proposals in high amenity zones and sensitive landscapes to be accompanied by Landscape Impact Assessment that demonstrates visual impact and outlines mitigation measures to reduce the impact of development. It is also a requirement for proposals on sites with steep or varying topography to be accompanied by a comprehensive site analysis, concept proposal, design statement and sections that demonstrate how proposals incorporate the natural slope of sites.</p> <p>The designation of zoning objectives across the County has been informed by the Landscape Character Assessment and the majority of lands identified as having medium to high sensitivity landscape sensitivity are zoned as High Amenity (HA-DM/LV/DV) or as Rural (RU) under which uses have been deemed appropriate to such areas subject to rigorous assessment. This is strengthened by HCL Policy 7 (Landscapes).</p> <p>Combined with the Draft Plan policy to protect and enhance the visual amenity of High Amenity areas (policies HCL 9, 10 and 11), to restrict the visual impact of development and to carry out Landscape Impact Assessment; these provisions will discourage inappropriate development in areas of high visual amenity and ensure that the visual impact of developments on elevated sites are mitigated. This will in turn ensure that the visual and scenic amenity of the countryside is adequately protected.</p> <p>The holistic approach of the Draft Plan negates the need to reiterate considerations of landscape impact in relation to the management of development and need to minimise potential adverse impacts on the landscape or reiterate the need for visual and landscape impact assessment.</p> <p>Further to responses to submission under Chapter 9 (Heritage Conservation and Landscapes) it is accepted that Section 11.5.5(ii)</p>
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	<p>should be amended to support development that enhances existing degraded landscapes and ensure that development is carefully sited, designed and of an appropriate scale.</p> <p>Recommendation: It is recommended that Section 11.5.5(ii) of the Draft County Development Plan be amended to support development that enhances existing degraded landscapes and include a need to ensure that development is carefully sited, designed and of an appropriate scale.</p> <p><u>Fencing</u> It is accepted that Section 11.5.5 (iii–fencing) should be amended to prohibit barbed wire fencing. It is already stated that stiles or gates may be required at appropriate places and this should be sufficient to ensure that permissive access routes and public rights of way are not obstructed.</p> <p>The prohibition of standard wire fencing would place an onerous financial burden on farmers and land owners and, in the context of the limited visual impact of such boundary treatment compared to timber and concrete block, such a requirement would be unreasonable.</p> <p>Recommendation It is recommended that Section 11.5.5 (iii – fencing) of the Draft County Development Plan be amended to prohibit barbed wire fencing.</p> <p><u>Rights of Way</u> Further to responses to submission under Chapter 9 (Heritage Conservation and Landscapes), HCL 16 Objective 1 of the Draft Plan 2016-2022 seeks to preserve and map public rights of way as they come to the attention of the Council.</p> <p>It is accepted that a requirement should be inserted into Section 11.5.5 that seeks the identification of Public Rights of Way and established</p>
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	<p>walking routes as part of any planning applications for new golf courses within the County.</p> <p>Recommendation It is recommended that Section 11.5.5 of the Draft County Development Plan be amended to include a requirement for the identification of Public Rights of Way and established walking routes as part of any planning applications for new golf courses within the County.</p> <p><u>Noise Generating Sports</u> Policy 7 (Environmental Quality) of the Draft Plan 2016-2022 states that the Council will have regard to European Union, National and Regional policy relating to (inter alia) noise pollution and to seek to take appropriate steps to reduce the effects of (inter alia) noise and light pollution on environmental quality and residential amenity.</p> <p>Noise generating activities are often more suited to areas of the County where there is less potential to impact on residential amenity and this is reflected by the above policy.</p> <p>Furthermore, Section 11.6.3 of the Draft Plan states that proposals with the potential to give rise to significant noise impacts may require a Noise Impact Assessment and mitigation plan to minimise noise disturbances and protect the amenities of the area.</p> <p>Such proposals should therefore be assessed on a case by case basis and it is considered appropriate to include a standard that seeks to limit sporting facilities without allowing full and proper assessment at Development Management stage.</p> <p>The suggested restriction on noise generating activities could either prejudice the provision of needed sporting facilities or could also result in noise generating activities being directed to established residential areas of the County.</p>
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	<p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p>
11.6.0 Infrastructure and Environmental Quality	
<p>1. Request to amend wording of 11.6.1 (v) Rain Water Harvesting from 'should' to 'shall' in relation to liaison with relevant stakeholders in the context of development proposals. (DRAFTDEVPLAN0178, Dublin South West Green Party)</p> <p>2. Submitted that in Section 11.6.2, ICT the 2nd paragraph should be replaced by Submit a reasoned justification as to the need for the development at the proposed location including a map covering an area within a minimum radius of 10km showing all antennae operated by the applicant and its existing coverage and details of antennae operated by all other providers and the reason why coverage cannot be provided by existing antennae and why it is not feasible to share existing facilities having regard to the Code of Practice on Sharing of Radio Sites issued by the \Commission for Communications Regulations,(20030. Prohibit telecommunication masts, masts, antennae and ancillary equipment in primary and secondary amenity areas (local examples) or at locations detrimental to designated protected views, within views or setting of national monuments or in close proximity to public amenity and conservation areas. On obtrusive sites, areas of designated European and National sites, recorded Monuments and Areas of Archaeological importance the need to locate at a specific location must be outlined, possible alternative sites must be cited and the visual impact must be mitigated by careful siting, design and landscaping. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p>	<p>Chief Executive's Response and Recommendations</p> <p>The Chief Executive has carefully considered the issues raised in relation to Infrastructure and Environmental Quality and provides responses and recommendations under the following subheadings:</p> <ul style="list-style-type: none"> ▪ Rain Water Harvesting ▪ Information and Communications Technology <p><u>Rain Water Harvesting</u></p> <p>The Chief Executive notes the request to strengthen the wording from 'should' to 'shall' in relation to the applicants consulting with the relevant stakeholders when proposing rain water harvesting.</p> <p>The existing text reads</p> <p>(v) Rain Water Harvesting</p> <p>Development proposal including rain water harvesting should liaise with the relevant stakeholders, to ensure the implementation of BS8515-2009 (Rain & grey water harvesting), subject to class of use (SI 600 2001) and the economic viability for the end user.</p> <p>Overall, the Draft Plan promotes the incorporation of water conservation in proposed development. Section 11.6.1 of the Draft Plan seeks to ensure that proposed water conservation measures are developed in consultation with relevant stakeholders to ensure an adequate standard of provision and the economic viability for the end user. The Chief Executive does not recommend the word 'shall' in this context as it may be viewed by developers as an additional mandatory requirement and deter the provision of water conservation best practices in developments.</p> <p>Recommendation</p>

	<p>It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Information and Communications Technology</u></p> <p>The Chief Executive notes the request to replace sections of 11.6.2 with specific text. The specific text relates to the siting, impact, justification and co-location of the telecommunications antennae and support structures.</p> <p>The primary difference in content is the requirement for applicants to provide a map of 10km in radius showing all antennae. It is considered that this requirement would be excessive. The Draft Plan requirement for a map showing 2km is considered adequate.</p> <p>It is considered that the text in Section 11.6.2 addresses the issues raised in relation to siting, impact, justification and co-location of the telecommunications antennae and support structures.</p> <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p>
<p>11.7.0 Energy</p>	
<p>1. Submission indicates that the recycling of waste heat should be encouraged under planning permissions for future development to address climate change and that Grange Castle is in a unique position to provide for this. (DRAFTDEVPLAN0405, Mr & Mrs Power)</p>	<p>Chief Executive's Response and Recommendation</p> <p>Having regard to waste heat provision, it is noted that Energy (E) Policy 5 Waste Heat Recovery & Utilisation states:</p> <p>'It is the policy of the Council to promote the development of waste heat technologies and the utilisation and sharing of waste heat in new or extended industrial and commercial developments, where the processes associated with the primary operation onsite generates waste heat.</p> <p>This policy was included in the Draft Plan as the Council recognises the significant contribution that waste heat capturing and sharing can make in addressing local energy needs and reducing costs, particular in the commercial sector. This has been highlighted in the evidenced based</p>

	<p>South Dublin Spatial Energy Demand Analysis which was undertaken by the Council, in partnership with CODEMA, in 2015. The wording of Energy (E) Policy 5 and the implementation criteria set out in Section 11.7.6 adequately address the potential for waste heat development in South Dublin County, which could occur at Grange Castle Business Park and at a range of other locations across the County.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
11.8.0 Environmental Assessment	
<ol style="list-style-type: none"> 1. Recommendation to include specific objective/s, where relevant and appropriate, in the Plan to ensure that any planned/future development projects referred to (including industrial regeneration, new roads, community facilities, schools, cycle paths, etc.), take into account the requirements of the EIA, Habitats, Birds, Water Framework and Floods Directives respectively as appropriate. (DRAFTDEVPLAN0052, David Galvin, Environmental Protection Agency) 2. Recommendation that a commitment be given that any proposals for significant development on contaminated brownfield sites should consider establishing environmental management plans to ensure these sites are appropriately remediated prior to the commencement of development. (DRAFTDEVPLAN0052, David Galvin, Environmental Protection Agency) 3. Recommendation to include a commitment to reviewing, as part of the monitoring programme, the effectiveness of environmental monitoring/mitigation measures during the lifetime of the Plan. The Monitoring Programme should be flexible to take account of specific environmental issues which may arise during implementation of the Plan. In this context, there is merit in linking the SEA and Plan related monitoring. This monitoring programme should also be able to take 	<p>Chief Executive's Response and Recommendation <u>Planned/Future Development</u> Section 9.3.1 of the Draft Plan details the requirements of the Habitats Directive with Policy HCL12 stating the Councils policy to support the conservation and improvement of Natura 2000 sites and to protect the network from any plans/projects that are likely to have significant effects. Policy IE2 refers to the Councils policy to meet the requirements of the WFD. Furthermore, the preparation and implementation of the Green Infrastructure Strategy (Policy G1 Objective 2) will assist in meeting statutory obligations under the EU Directives. Chapter 11 of the Draft Plan relates to Implementation. Section 11.8.0 (Environmental Assessment) details specific requirements under the various EU Directives. Furthermore, Section 11.9.0 Development Management Thresholds will provide a list of thresholds for studies and assessments that arise out of Chapter 11 and the statutory requirements from the EU Directives for plans and projects will be detailed here for ease of reference.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended</p>

<p>account of, and identify, potential cumulative effects. (DRAFTDEVPLAN0052, David Galvin, Environmental Protection Agency)</p> <p>4. Recommendation for Plan to provide appropriate measures to minimise the potential for significant environmental effects where uncertain/negative effects are identified. (DRAFTDEVPLAN0052, David Galvin, Environmental Protection Agency)</p>	<p><u>Brownfield Sites</u> Policy IE2 Objective 10 “<i>To require adequate and appropriate investigations to be carried out into the nature and extent of any soil and groundwater contamination and the risks associated with site development work, in particular for brownfield development</i>” deals with this issue.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended</p> <p><u>Monitoring Programme</u> A specific form of GIS based monitoring is being undertaken in tandem with the assessment of planning applications and is used in order to provide up to the minute data regarding the implementation of the Strategic Environmental Objectives in the current Plan 2010-2016. This will allow for faster reaction to the cumulative impact of the development proposals. A preliminary monitoring report was carried out at the Mid Term Review of the current Plan regarding the effects of implementing the CDP. The results illustrated that no thresholds had been exceeded. Section 9.5 of the SEA Environmental Report details the proposals to continue this system of monitoring and develop it to include for cumulative impacts.</p> <p>Recommendation It is recommended that Section 9.6 (Responsibility) of the SEA Environmental Report be amended to include addition of text as follows: “South Dublin County Council are responsible for the implementation of the SEA Monitoring Programme including</p> <ul style="list-style-type: none"> • Linking SEA monitoring output with the mid-term review of the Development Plan; • Monitoring specific indicators and identifying any significant effects, including cumulative effects; • Reviewing the effectiveness of monitoring/mitigation measures
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	<p>during the lifetime of the Plan; and</p> <ul style="list-style-type: none"> • Identifying any cumulative effects” <p><u>Uncertain/Negative Effects</u> Section 8 of the SEA Environmental Report details the location of each of the mitigation measures within the Draft Plan to minimise the potential for significant environmental effects.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended</p>
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Chapter 11 Summary of Recommended Amendments to the Draft Plan

Section	Response Issue	Recommendation
11.1.0	Office over 1,000sqm	As per Section 4 of this report, recommended that the wording of ET1 Objective 6 in Chapter 4 of the Draft Plan be amended.
11.1.0	High Amenity – Liffey Valley (Table 11.13)	Amend Table 11.13 of the Draft County Development Plan relating to the High Amenity Liffey Valley (HA-LV) zoning objective matrix to include ‘Recreational Facility’ and ‘Sports Club/Facility’ uses as Open for Consideration, subject to restriction/caveats regarding their location/premises, scale, assessment of their landscape impact, and set back from the bank of the River Liffey.
11.1.0	High Amenity – Dodder Valley (Table 11.14)	Amend Table 11.14 of the Draft County Development Plan relating to the High Amenity Dodder Valley (HA-DV) zoning objective matrix to include ‘Recreational Facility’ and ‘Sports Club/Facility’ uses as Open for Consideration, subject to restriction/caveats regarding their location/premises, scale, assessment of their landscape impact, and set back from the bank of the River Dodder.
11.2.8	Advertising Signs	Amend Section 11.2.8 of the Draft Plan to include additional standards for Digital and Electronic Signage. Such signage should be limited to town centres and/or large retail precincts. Such signs should make a positive contribution to the public domain, omit no sound, have a minimum dwell period of 30 seconds (with a crossfade), not to result in obtrusive light that will create unacceptable glare (adjusting to environmental conditions), have limited hours of operation (esp. at night), not contain dynamic content (i.e. video) and not constitute a traffic hazard
11.3.8	Extractive Industry	Amend Section 11.3.8 of the Draft Plan to include reference to relevant national guidance on quarries and ancillary activities.
11.4.6	Travel Plans	Amend Section 11.4.6 to add requirement for the submission of a school travel plans for all new schools (and major extensions).
Table 11.23	Bus Parking	Amend Table 11.23 to include bus parking for pitches at the rate of 1 per pitch, with a subsequent reduction in car

		parking.
11.4.3	Electric Car Parking	Amend Section 11.4.3 of the Draft County Development Plan to include reference to the provision of dedicated facilities for the charging of battery operated cars at a rate of up to 10% of the total car parking spaces in residential developments.
11.5	Archaeological Heritage	<p>Amend the Chapter 9 introduction to state that the boundary defining Zones/Areas of Archaeological Potential for the Recorded Monuments listed and mapped in the County Development Plan does not necessarily define the full extent of the site or monument.</p> <p>Amend Section 11.5.1 to:</p> <ul style="list-style-type: none"> • Require new buildings within an Area/Zone of Archaeological Potential to be designed to have minimal impact on archaeological features; • Have regard to archaeological concerns when considering proposed infrastructure and roadworks located in close proximity to Recorded Monuments and Places; • Require archaeological testing to be carried out as part of an archaeological assessment where it's deemed that a proposed development may have an impact on an archaeological site or monument • Require archaeological monitoring to be carried out during the course of development works where it is considered necessary to identify and protect potential archaeological deposits, features or objects. • Require full archaeological excavation where it is recommended by the National Monuments Service or any superseding body. <p>• Have regard to Emerging Historic Landscape Character Assessments contained within the "Landscape Character Assessment of South Dublin County" (2015) when assessing relevant planning applications.</p>
11.5.5	High Amenity and Sensitive Landscapes	Amend Section 11.5.5(ii) to support development that enhances existing degraded landscapes and include a need to ensure that development is carefully sited, designed and of an appropriate scale.
11.5.5	Fencing	Amend Section 11.5.5 (iii – fencing) to prohibit barbed wire fencing.

11.5.5	Public Rights of Way	Amend Section 11.5.5 of the Draft Plan to insert a requirement that seeks the identification of Public Rights of Way and established walking routes as part of any planning applications for new golf courses within the County.
SEA Environmental Report	Environmental Assessment	<p>Amend Section 9.6 (Responsibility) of the SEA Environmental Report to include addition of text as follows:</p> <p>South Dublin County Council are responsible for the implementation of the SEA Monitoring Programme including</p> <ul style="list-style-type: none"> • Linking SEA monitoring output with the mid-term review of the Development Plan; • Monitoring specific indicators and identifying any significant effects, including cumulative effects; • Reviewing the effectiveness of monitoring/mitigation measures during the lifetime of the Plan; and • Identifying any cumulative effects

ZONING PROPOSALS

Zoning - General

Submission	Map No.	Site Area /Zoning	Response/Recommendation
<p>1. Proposal to rezone land from agriculture (Objective RU) to commercial at Baldonnell, Dublin 22.</p> <p>(DRAFTDEVPLAN0016, James Harper, James HarperDRAFTDEVPLAN0017, James Harper, James Harper DRAFTDEVPLAN0019, James Harper, James Harper DRAFTDEVPLAN0020, James Harper, James HarperDRAFTDEVPLAN0021, James Harper, James Harper DRAFTDEVPLAN0022, James Harper, James Harper)</p>	4	<p>1ha</p> <p>RU - ??</p>	<p>Chief Executive's Response and Recommendation</p> <p>The subject issue is the proposal to zone a small plot of land (circa 1.2 ha) at Baldonnell from Rural (RU) to commercial. It is considered that the intention of the submission is to seek an Enterprise and Employment (EE) zoning.</p> <p><u>Flood risk</u></p> <p>As part of the County Development Plan and SEA process 2016-2022, a Strategic Flood Risk Assessment (SFRA) was carried out for the County. Additionally, the Eastern CFRAM study draft mapping is available and also identifies areas in the County as having a potential risk. The foregoing data set provides an evidence base on flood risk in the County. The studies identify a significant portion of the subject lands as being in flood risk zone A.</p> <p>The Guidelines for Planning Authorities on Flood Risk Management were published by the OPW and DECLG in 2009. The Flood Risk Management Guidelines advise in relation to Flood Zones that the planning implications for each of the flood zones are:</p> <p><i>Zone A - High probability of flooding. Most types of development would be considered inappropriate in this zone. Development in this zone should be avoided and/or only considered in exceptional circumstances, such as in city and town centres, or in the case of essential infrastructure that cannot be located elsewhere, and where the Justification Test has been applied. Only water-compatible development, such as docks and marinas, dockside activities that require a waterside location, amenity open space, outdoor sports and recreation, would be considered appropriate in this zone.</i></p> <p>In this context, the proposal to rezone these lands as EE is not recommended as there are adequate lands and sites zoned EE available in the immediate vicinity of the site. In addition, it is recommended that the subject lands at Baldonnell are</p>

			<p>zoned for Rural 'RU', in line with the 'precautionary approach' regarding flood risk.</p> <p><u>Casement Aerodrome, Baldonnell</u> It is noted that the overall lands are located to the immediate southeast of Casement Aerodrome, Baldonnell, with the lands subject to the proposed rezoning partially located within the Inner Approach Area for the main runway at Casement and within the Security Zone of the aerodrome.</p> <p>Casement Aerodrome, the only secure military aerodrome in the State, does not fall under the control of the Irish Aviation Authority but the ICAO Standards and Recommended Practices are applied as policy by the Department of Defence at Casement Aerodrome. Additionally, the Department of Defence applies two further restricted areas of its own, a circular "Inner Zone" of 2km radius, and a 'Security Zone' more closely aligned with the flight strips, which are the areas around the runways.</p> <p>IE Policy 8 of the Draft Plan 2016-2022 states that it is the policy of the Council to safeguard the current and future operational, safety and technical requirements of Casement Aerodrome and to facilitate its ongoing development for military and ancillary uses within a sustainable development framework. Objectives under IE Policy 8 include restricting development in the environs of Casement Aerodrome to ensure same. Section 11.6.6 of the Draft Plan 2016-2022, regarding Implementation: Aerodromes, details restrictions pertaining to the Inner Approach Area of the aerodrome. Section also outlines a number of restrictions pertaining to development within the Security Zone adjacent to the Aerodrome, including in relation to a sterile zone relative to the Aerodrome boundary fence and building restrictions.</p> <p>The subject lands are partially within the Department of Defence Inner Approach Area and within the Security Zone of Casement Aerodrome; in this context it is not recommended to zone lands for development within this zone.</p> <p><u>Quantum of enterprise and employment lands</u> With regard to the proposed to rezone the subject lands EE, it is noted that the Economic Strategy for South Dublin County seeks to ensure that there is a</p>
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			<p>sufficient supply of zoned and serviced lands at suitable locations to accommodate future demand for enterprise and employment investment across a diverse range of sectors. The strategy also seeks to strengthen the alignment between employment, population and transport services.</p> <p>It is considered that the quantum of lands zoned for enterprise and employment uses are reasonable and appropriate to meet the job projections for the County during the lifetime of the Draft Plan 2016-2022. It is also noted that vacancy in established industrial areas and estates may accommodate EE-related uses. The zoning of additional EE lands at this location is not, therefore, warranted at this time.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>2. Request to rezone lands to north of proposed ring road and Stoney Lane Hill, Rathcoole, for development in lieu of further development along Main Street, to alleviate traffic issues in the village. (DRAFTDEVPLAN0153, Shay Conway, Shay Conway DRAFTDEVPLAN0154, Shay Conway, Shay ConwayDRAFTDEVPLAN0401, Shaw Conway, Shay Conway DRAFTDEVPLAN0152, Shay Conway, Shay Conway DRAFTDEVPLAN0160, Shay Conway, Shay Conway)</p>	8	N/A	<p>Chief Executive's Response and Recommendation The Chief Executive acknowledges the content of the submission and it is noted that it is a general statement and does not include accompanying maps.</p> <p>The lands, as described, are located within the Rural Metropolitan Area of the County beyond the edge of the settlements defined under the Chapter 1 Core Strategy and settlement hierarchy.</p> <p>It is a requirement under the Planning and Development Act 2000 (as amended) for the County Development Plan, including its Core Strategy, to be consistent with the Regional Planning Guidelines for the Greater Dublin Area 2010-2022. The Core Strategy including its settlement strategy has been prepared in accordance with the Regional Planning Guidelines and ensures that there are sufficient zoned lands in the County to provide for housing need and that such lands are located appropriately within a defined settlement hierarchy.</p> <p>As indicated in Tables 1.8, 1.9 and 1.10 of the Draft Plan, provision has been made for 1,188 Hectares of lands that are zoned for residential development within the County. These are sufficient to provide for the housing needs of the County up to circa 2025 (40,273 dwellings). The zoning of the subject lands</p>

			<p>would therefore be surplus to the housing needs of the County and are also not appropriate to housing development by reason of their location beyond the edge of a defined settlement.</p> <p>The Core Strategy and Regional Planning Guidelines seek to ensure that zoned lands are located to gain maximum benefit from existing assets through consolidation and increasing densities within the existing built footprint of the City, suburbs and growth towns within an identified settlement hierarchy. The lands as described are zoned to prevent a sprawl of development beyond the boundaries of the identified settlements and into rural and high amenity areas of the County.</p> <p>Zoning of sites such as the subject lands would allow for piecemeal development and shift the emphasis of consolidation away from the Metropolitan Consolidation Areas of the County (Palmerstown, Terenure, Templeogue, and Rathfarnham etc.), the Metropolitan Consolidation Towns of Tallaght, Lucan and Clondalkin, the Moderate Sustainable Growth Town of Saggart-Citywest and the Small Towns of Newcastle and Rathcoole. This would undermine the consolidation of such settlements including their existing social and physical infrastructure, services and facilities and would promote lower density development and agglomerations across greenfield sites that are more difficult to serve by such infrastructure, services and facilities.</p> <p>The zoning of lands as described would therefore be at variance with the Core Strategy and would undermine its settlement hierarchy including its consistency with the Regional Planning Guidelines for the Greater Dublin Area.</p> <p><u>Rathcoole's Housing Capacity</u></p> <p>Further to the above, the subject lands are zoned to prevent a sprawl of development beyond the core boundary of Rathcoole and into rural areas of the County. Rathcoole has been designated as a Small Town under the Draft Plan's Core Strategy in accordance with the requirements of the 'Regional Planning Guidelines for the Greater Dublin Area 2010-2022'.</p> <p>It is stated under the Regional Planning Guidelines that levels of growth in all small towns shall be managed in line with the ability of local services to cater for any growth, responding to local demand. The guidelines on 'Sustainable</p>
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<p>3. Proposed zoning of lands adjacent to eastern side of Green Isle Hotel, Boot Road, Dublin 22 from Zoning Objective F (open space and recreational amenities) to objective A (residential) or EP2 (manufacturing, R&D, light industry , employment and enterprise) on basis of:</p> <ul style="list-style-type: none"> - Absence of open space or recreation amenity value and proximity to Corkagh Demesne and associated amenities; - Policy of the Regional Planning Guidelines to direct population and economic growth to designated growth centres; - Access to public services and infrastructure and potential to improve pedestrian and cycle facilities; - The current zoning of surrounding lands. <p>(DRAFTDEVPLAN0073, William Donoghue,</p>	5	<p>0.75 ha</p> <p>OS – EE or RES</p>	<p>Chief Executive's Response and Recommendation The submission requests the zoning of the lands from Open Space (OS) to residential or employment. The site is 0.75ha in area.</p> <p>The subject lands comprises a narrow strip of land sandwiched between Boot Road and the N7, and immediately adjoining the existing Green Isle Hotel premises. The site is not functional as an amenity area. It is noted that the subject site could be served by road access from Boot Road and the adjoining Green Isle Hotel site has an EE zoning. Having regard to the context and character of the subject lands, existing zoning objectives adjoining and the limited scale of the subject lands, it is considered that the lands would be appropriate for an EE zoning to facilitate an infill style employment extension at this location and in this instance.</p> <p>Recommendation It is recommended that the subject lands be rezoned from Open Space (OS) to Enterprise and Employment (EE) 'To provide for enterprise and employment related uses'.</p>

William Donoghue & Associates, Kilmore Ventures Ltd.)			
<p>4. Submission on behalf of owner of approx. 0.29 ha. of lands in Oldbawn Tallaght adjacent to Oldbawn Shopping Centre proposes that the subject lands be rezoned from Objective HA-DV (High Amenity - Dodder Valley) to Objective RES (residential) or Objective REGEN (Regeneration) for reason of the following:</p> <ul style="list-style-type: none"> - The Draft Development Plan states a shortfall of 5,844 housing units for the duration of the plan; - The rezoning would make efficient use of finite resources and will promote sustainable residential development; - The subject lands have frontage and access onto the Firhouse Road, access to public utilities and access to public transport and cycle routes; - The rezoning would represent a natural, logical and appropriate extension of the adjoining Local Centre, would help to consolidate the area and would not conflict with land uses; - The principle of residential development has already been established on the subject lands. <p>(DRAFTDEVPLAN0092, Robert Nowlan , Ryan Nowlan Consuting , Bagnall Family c/o Bagnall Doyle McMahon)</p>	9	<p>0.29ha</p> <p>HA-DV – REGEN or RES</p>	<p>Chief Executive’s Response and Recommendation</p> <p>The subject lands is a 0.29ha site adjacent to Oldbawn Shopping Centre. The site accommodates an existing dwelling fronting onto the Firhouse Road. The site is located within the Dodder Valley.</p> <p>The Dodder Valley is a proposed Natural Heritage Area (pNHA); HCL Policy 13 and associated objectives relates to the protection of same. HCL Policy 10 of the Draft Plan 2016-2022 states that it is the policy of the Council to protect and enhance the visual, recreational, environmental, ecological, geological and amenity value of the Liffey Valley and Dodder Valley, as key elements of the County’s Green Infrastructure network. Policy HCL10 Objective 6 refers specifically to the key role of the Dodder Valley and the need to support the continued development of the Dodder Valley as a linear park, greenway and an area of special amenity, to include for the completion of the Dodder Green Route along the full length of the Dodder River.</p> <p>It is considered that the provision of additional residential zoning within the Dodder Valley would be at variance with the overarching policies and objectives relating to the protection of the Dodder Valley detailed in Chapter 9 of the Draft Plan. The Core Strategy including its settlement strategy has been prepared in accordance with the Regional Planning Guidelines and ensures that there are sufficient zoned lands in the County to provide for housing need. The zoning of additional lands within the Dodder Valley is not required to achieve the RPGs targets.</p> <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p>
<p>5. Submission made on behalf of IRFU in relation to lands within its ownership at Newlands Cross/ Belgard Road advises that</p>	5	<p>38 ha</p> <p>RU</p>	<p>Chief Executive’s Response and Recommendation</p> <p>The submission outlines that the Rural (RU) zoning is inappropriate and should be reconsidered.</p>

<p>the proposed RU (Rural Amenity) zoning of the lands are inappropriate and should be reconsidered or, alternatively, be dealt with by SLO/ objective to carry out a study on the development potential of the lands.</p> <p>The RU zoning is inappropriate for a site that is urban in nature, is of strategic importance and adjoins long established residential development and a park particularly in relation to restrictions on residential development. Appropriate uses for the subject lands such as a medical campus, a retirement home or a retail development are incompatible with the RU zoning as hospital and nursing home uses in the zone are not permitted.</p> <p>Furthermore, a transport mobility objective to facilitate proposed Metro West Park and Ride facility is requested as the RU zoning restricts the consideration of car parking. Submission outlines that this is inappropriate in relation to the Draft's support for Metro West and the RPA/TII proposal to situate a Park and Ride facility on the lands;</p> <p>(DRAFTDEVPLAN0120, John Sheehan, Tom Phillip + Associates, The Irish Rugby Football Union (IRFU))</p>		<p><u>Land Use Zoning</u></p> <p>The subject area is zoned 'Green Belt' in the 2010 – 2016 Development Plan and is outlined as Rural (RU) in the Draft Plan. The Chief Executive notes the content of the submission including the identification of the strategic potential of the lands adjacent to Tallaght, Newlands Cross and the Metro West route; however, it is noted that the Metro West proposal has not been included within the Draft NTA Transport Strategy. The zoning of the subject lands as objective Rural (RU) maintains the established visual and environmental buffer between the Tallaght and Clondalkin and restrict the development of the area for inappropriate land uses.</p> <p>The Core Strategy in Chapter 1 of the Draft Plan identifies a growth in population of over 26,300 people and a need for over 32,000 dwellings during the lifetimes of the County Development Plan. As indicated in Tables 1.8, 1.9 and 1.10 of the Draft Plan, this includes for 152 hectares or the potential for 5,300 additional dwellings in the Metropolitan Consolidation Town of Tallaght. The zoning of the subject lands would therefore be surplus to the housing needs of Tallaght for the lifetime of the Draft Plan and beyond 2025. In the context of the Core Strategy and the uncertainty in relation to the Long Term High Capacity Public Transport route outlined on the Draft maps, it is considered that any significant development of the entire lands is premature at this time and the Rural zoning is appropriate. This zoning reflects the existing agricultural use of the lands. The provision of a study to assess the development potential of the lands is not considered necessary until such time as additional demand for development has been identified in the County. Furthermore, the zoning and potential of the landholding can be reconsidered in the review and preparation process for future County Development Plans.</p> <p><u>Proposed Land Uses</u></p> <p>The submission contends that uses such as a medical campus, a retirement home, a retail development, hospital and nursing home uses are appropriate uses for the site and are incompatible with the RU zoning.</p> <p>The Draft Plan provides settlement, retail and urban hierarchies and the provision of the specified uses at the current site would be in conflict with the Draft Plan,</p>
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			<p>namely the following objectives:</p> <p>UC1 Objective 1: To direct retail, commercial, leisure, entertainment, civic, community and cultural uses into town, village, district and local centres and to achieve a critical mass of development and a mix of uses that is appropriate to each level in the urban hierarchy.</p> <p>C11 Objective 4: To direct healthcare facilities into town, village, district and local centres and to locations that are accessible by public transport, walking and cycling, in the first instance.</p> <p>UC2 Objective 1: To promote Tallaght Town Centre as the primary urban centre in the County by directing higher order retail, retail services, residential, cultural, leisure, financial, public administration, restaurants/bars, entertainment and civic uses into and adjoining the Core Retail Area of this centre.</p> <p>The Rural (RU) zoning provides for uses such as Hotel/ Hostel, Recreational – Facility, Sports Club/ Facility, Veterinary Surgery, Community Centre, Service Garage, Bed & Breakfast, Health Centre and Petrol Station as open for consideration.</p> <p><u>Park and Ride location</u></p> <p>In relation to the provision of the park and ride facility on the site to serve Metro West, it is noted that the Metro West proposal has not been included within the Draft NTA Transport Strategy. A Core Orbital Corridor commencing in Tallaght connecting to the Blanchardstown that generally follows the alignment of the former Metro-West corridor is included in the Draft Strategy. A detailed route selection and design process will determine how the reservation is utilised. In this context, it is considered that the designation of a park and ride is premature. Additionally, Section 6.2.1 of the Draft Plan outlines that park and ride facilities provide for car parking in close proximity to a major public transport route, allowing commuters to park their car and undertake the remainder of their journey by public transport. A number of major park and ride facilities are located in the County and further sites have been identified (see Table 6.3).</p> <p>Recommendation</p>
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			It is not recommended that the Draft County Development Plan be amended.
6. Submission requests that following on from the construction of the North Clondalkin Library, the remaining land be zoned to Open Space. (DRAFTDEVPLAN0174, Cllr Jonathan Graham, Cllr Jonathan Graham)	5	OS	<p>Chief Executive's Response and Recommendation</p> <p>The Chief Executive notes the submission and outlines that the lands immediately adjacent to the Library are zoned Open Space (OS) in the Draft Plan. No map of the area for zoning accompanied the submission.</p> <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p>
7. Submission outlines that following on from the infill development in St Mark's Green, the remaining land, be zoned to Open Space. (DRAFTDEVPLAN0174, Cllr Jonathan Graham, Cllr Jonathan Graham)	5	OS	<p>Chief Executive's Response and Recommendation</p> <p>The Chief Executive notes the submission and outlines that the lands at St Marks's Green are zoned Open Space (OS) in the Draft Plan. No map of the area for zoning accompanied the submission.</p> <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p>
8. Submission on behalf of owner of lands at Hazelhatch requests that the area is designated as a new settlement centred on Hazelhatch Station to accommodate residential, employment and associated social and community services and facilities by reason of the following: - The ability of the lands to deliver a residential settlement within an area of high employment potential at a key transport location and corridor of regional and national importance where significant investment has been made in rail infrastructure; - The substantial need for additional housing in the Dublin Region up to 2030 and beyond and the ability of the lands at Hazelhatch to meet housing targets;	3	61 ha	<p>Chief Executive's Response and Recommendation</p> <p>The subject submission refers to 61.7 ha of land at Hazelhatch and requests designation as a new settlement.</p> <p><u>Undermining of Core Strategy</u></p> <p>The Core Strategy including its settlement strategy has been prepared in accordance with the Regional Planning Guidelines and ensures that there are sufficient zoned lands in the County to provide for housing need and ensures that such lands are located appropriately within a defined settlement hierarchy.</p> <p>As indicated in Tables 1.8, 1.9 and 1.10 of the Draft Plan, provision has been made for 1,188 Hectares of lands that are zoned for residential development within the County. These are sufficient to provide for the housing needs of the County up to circa 2025 (40,273 dwellings).</p> <p>The Core Strategy and Regional Planning Guidelines seek to ensure that zoned lands are located to gain maximum benefit from existing assets through</p>

<ul style="list-style-type: none"> - Location of Hazelhatch within the Metropolitan Boundary of the RPGs and policy to gain maximum benefits from existing assets in this area; - Support from policy contained in the Draft Development Plan (TM2 Objective 3) that's sets out to generate additional demand from public transport and to investigate the provision of a rail corridor between Saggart and Hazelhatch; - Capacity of Hazelhatch to sit within a network of existing towns and villages within the County providing a preferable solution to the incremental westward expansion of built up areas that do not have access to existing or planned public transport corridors; - The opportunity to develop a distinct settlement in the open countryside. <p>(DRAFTDEVPLAN0179, Pauline Byrne, Brady Shipman Martin, Tudor Homes)</p>		<p>consolidation and increasing densities within the existing built footprint of defined settlements.</p> <p>The subject lands are located within the Rural Metropolitan Area of the County, beyond the edge of the settlements defined under the Chapter 1 Core Strategy and its settlement hierarchy. Zoning of the lands would shift the emphasis of consolidation away from the Metropolitan Consolidation Area and Metropolitan Consolidation Towns (particularly Lucan and Clondalkin and including SDZ planning schemes). This would undermine the consolidation of such settlements including their existing social and physical infrastructure, services and facilities and would promote development and agglomerations across greenfield sites that are more difficult to serve by such infrastructure, services and facilities.</p> <p>The zoning of the subject lands would therefore be at variance with the Core Strategy and would undermine its settlement hierarchy including its consistency with the Regional Planning Guidelines for the Greater Dublin Area</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>9. Submission on behalf of sports and social club requests that approx. 30 acres of lands that accommodates sports facilities (pitch and putt course, soccer pitches and a club house etc.) off the Coldcut Road, Clondalkin, Dublin 22 be rezoned from Objective 'OS' (Open space and recreational amenities) to Objective 'RES' (residential) or Objective 'REGEN' (regeneration) for reason of the following:</p> <ul style="list-style-type: none"> - Location near the planned Lucan/Adamstown LRT/BRT Corridor and Metro West LRT/BRT Corridor; - The 'edge of centre' location of the site in relation to Liffey Valley Town Centre, which 		<p>Chief Executive's Response and Recommendation</p> <p>The submission requests the rezoning of the 10.73 ha site to REGEN or RES. The site is zoned as OS in the Draft Plan and currently used as a sports and social club for current and former employees of Dublin Bus. The Chief Executive acknowledges the content of the submission in relation to the strategic location of the site.</p> <p>REGEN Zoning The Regeneration (REGEN) zoning objective has been introduced to support and facilitate the regeneration of underutilised industrial lands that are proximate to town centres and/or public transport nodes for more intensive enterprise and residential-led regeneration. Having regard to the greenfield nature of the subject site, the distance of the site from other REGEN zonings and urban centres, it is considered that the Regeneration zoning is not appropriate at this location.</p>

<p>is sequentially preferable for zoning;</p> <ul style="list-style-type: none"> - Support from national and regional planning policy to consolidate the GDA Metropolitan Area through the development of underutilised lands and the integration of land use and transport planning that promotes intensification along public transport corridors; - Potential to improve pedestrian linkages with Liffey Valley Town Centre; - Proposal for an SLO that will require the production of a masterplan and 30% of lands to be retained for public open space for recreational and community facilities that benefit the local community. <p>(DRAFTDEVPLAN0208, John Tierney, John Spain Associates, Dublin City Services Sports & Social ClubDRAFTDEVPLAN0348, John Spain Associates, John Spain Associates, Dublin City Services and Sports and Social Club)</p>			<p>Residential (RES)</p> <p>The potential of the site for residential zoning and proposal to include a SLO to require 30% of lands to be retained for public open space is noted by the Chief Executive.</p> <p>The Core Strategy including its settlement strategy has been prepared in accordance with the Regional Planning Guidelines and ensures that there are sufficient zoned lands in the County to provide for housing need and ensures that such lands are located appropriately within a defined settlement hierarchy. As indicated in Tables 1.8, 1.9 and 1.10 of the Draft Plan, provision has been made for 1,188 Hectares of lands that are zoned for residential development within the County. These are sufficient to provide for the housing needs of the County up to circa 2025 (40,273 dwellings).</p> <p>The subject lands are located within the Metropolitan Consolidation Town of Clondalkin. The Draft Plan already provides for approx. 18,100 dwellings in the Metropolitan Towns of Lucan and Clondalkin (including 8,900 dwellings in Adamstown SDZ and 8,000 dwellings under Clonburris SDZs). The zoning of the subject lands would therefore be additional to the estimated housing needs of the County for the lifetime of the Draft Plan and beyond 2025.</p> <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p>
<p>10. Ensure that lands at Clonburris are zoned for zoned residential, educational, recreational, leisure, commercial, transport and medical uses and includes for the provision of a hospital and IT.</p> <p>(DRAFTDEVPLAN0253, Lorraine Hennessy, The Workers' Party)</p>	4	c156 ha	<p>Chief Executive's Response and Recommendation</p> <p>Clonburris is a designated Strategic Development Zone. The Planning and Development Act, 2000 (as amended) introduced Strategic Development Zones (SDZs). A Planning Scheme must be prepared for the SDZ to indicate the extent and type of development that will take place and proposals relating to supporting infrastructure and facilities. Development within a SDZ must be consistent with the relevant Planning Scheme.</p> <p>The Government designated 180 hectares of land at Clonburris as a Strategic Development Zone in 2006. The future development of these areas will be</p>

			<p>subject to an approved Planning Scheme and is dependent on a sustainable delivery model.</p> <p>As such, the County Development Plan provides a SDZ zoning with an objective to provide for strategic development in accordance with approved planning schemes. The assignment of land uses is an issue for the SDZ planning scheme.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>11. Submission on behalf of owner of 3 acres of lands off the N81 requests that the lands be zoned from 'Agriculture' to either 'Residential' or 'Light Industry' by reason that a factory has been operating on the site since the 1970s; frontage onto the N81 and the opportunity for reduced traffic from the planned realigned N81 to the south; the existence of residential, community and petrol filling station uses in the areas; the existence of water mains and services in the area and; logical extension of existing development. (DRAFTDEVPLAN0492, Michael Mc Guirk, Michael J.McGuirk & Co., Michael Mc Guirk.)</p>	8	<p>1.96 ha</p> <p>RU - RES or EE</p>	<p>Chief Executive's Response and Recommendation The submission proposes the rezoning of a section of land to the south of the N81 at Kiltalown, Tallaght. The site is adjacent to an existing Topaz service station and accommodates a vacant factory unit and hardstanding. Noted that the submission makes reference to Residential and Light Industry (assumed to be EE) as possible new zoning for the site.</p> <p><u>Residential</u> The subject lands are located within the Rural Metropolitan Area of the County beyond the edge of the settlements defined under the Chapter 1 Core Strategy and settlement hierarchy.</p> <p>It is a requirement under the Planning and Development Act 2000 (as amended) for the County Development Plan, including its Core Strategy, to be consistent with the Regional Planning Guidelines for the Greater Dublin Area 2010-2022. The Core Strategy including its settlement strategy has been prepared in accordance with the Regional Planning Guidelines and ensures that there are sufficient zoned lands in the County to provide for housing need and that such lands are located appropriately within a defined settlement hierarchy.</p> <p>As indicated in Tables 1.8, 1.9 and 1.10 of the Draft Plan, provision has been made for 1,188 Hectares of lands that are zoned for residential development within the County. These are sufficient to provide for the housing needs of the County up to circa 2025 (40,273 dwellings). The zoning of the subject lands would therefore be surplus to the housing needs of the County and are also not</p>

			<p>appropriate to housing development by reason of their location beyond the edge of a defined settlement.</p> <p>The Core Strategy and Regional Planning Guidelines seek to ensure that zoned lands are located to gain maximum benefit from existing assets through consolidation and increasing densities within the existing built footprint of the City, suburbs and growth towns within an identified settlement hierarchy. The subject lands are zoned to prevent a sprawl of development beyond the boundaries of the identified settlements and into rural and high amenity areas of the County.</p> <p>Zoning of sites such as the subject lands would allow for piecemeal development and shift the emphasis of consolidation away from the Metropolitan Consolidation Areas of the County (Palmerstown, Terenure, Templeogue, and Rathfarnham etc.), the Metropolitan Consolidation Towns of Tallaght, Lucan and Clondalkin, the Moderate Sustainable Growth Town of Saggart-Citywest and the Small Towns of Newcastle and Rathcoole. This would undermine the consolidation of such settlements including their existing social and physical infrastructure, services and facilities and would promote lower density development and agglomerations across greenfield sites that are more difficult to serve by such infrastructure, services and facilities.</p> <p>The zoning of the subject lands would therefore be at variance with the Core Strategy and would undermine its settlement hierarchy including its consistency with the Regional Planning Guidelines for the Greater Dublin Area.</p> <p><u>Employment and Enterprise (EE)</u></p> <p>It is noted that the subject site was formerly used as an industrial premises. The Chief Executive considers that the provision of a zoning objective on a site/s does not preclude the existing use of a particular site or property continuing operation. Additionally, Section 11.1.1 includes provision for the consideration of development proposals of existing land uses that are non-conforming with the zoning objective. Land use zoning is strategic in nature and incremental retrofitting of zoning objectives to match the existing use on small plots of land is not recommended as it undermines the Core Strategy of the Plan.</p> <p>With regard to the proposed to rezone the subject lands EE, it is noted that the</p>
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			<p>Economic Strategy for South Dublin County seeks to ensure that there is a sufficient supply of zoned and serviced lands at suitable locations to accommodate future demand for enterprise and employment investment across a diverse range of sectors. The strategy also seeks to strengthen the alignment between employment, population and transport services. Whilst a range of employment uses are permitted in principle or open for consideration across a range of land-use zonings, the County Development Plan seeks to guide enterprise and employment development to appropriate locations by identifying economic clusters and setting out policies and objectives for the future development of these areas. The zoning of a small piecemeal site for EE lands at this location is considered to be at variance with the Core Strategy</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>12. It is submitted that the land use zoning designation at Weston Airport, and immediately adjacent lands should be reconsidered and realign the land use zoning such that it more accurately reflects the long established and permanent use on the site (i.e. as a functional airport facility). (DRAFTDEVPLAN0234, Weston Aviation Academy Ltd. c/o Stephen M. Purcell, Future Analytics Consulting Ltd., Weston Aviation Academy Ltd (c/o Future Analytics Consulting Ltd.), Weston Aviation Academy Ltd)</p>	1	<p>17.1 ha RU - ??</p>	<p>Chief Executive's Response and Recommendation The subject lands at Weston Aerodrome are zoned as RU in the Draft Plan. Table 11.16 of the Draft Plan details that Aerodrome/Airfield is Permitted in Principle in the RU zone. Schedule 5 defines Aerodrome/ Airfield as an area of land or water, including any buildings, installations or equipment, intended to be used either wholly or in part for the arrival, departure or surface movement of aircraft.</p> <p>It is considered that the Rural (RU) land use zoning for Weston adequately facilitates the Aerodrome. Furthermore, the policies and objectives of Section 7.8 provide a policy framework for Aerodromes in the County.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>

<p>13. Submission seeks to alter the zoning of the Hermitage Medical Clinic to reflect its current use as an important medical facility. Subject lands are subject to existing zoning objective I, and proposed zoning objective HA-LV under which primary health care centre/hospital/other medical uses are 'not permitted'. The existing hospital represents a non-conforming use, as defined in the Plan.</p> <p>Submission requests provision of a new zoning objective to reflect the sites current use and to cater specifically for medical/hospital uses. In this regard, submission notes that Dun Laoghaire Draft County Development Plan contained such a zoning objective - Objective MH: to improve, encourage and facilitate the provision and expansion of medical/hospital uses and services.</p> <p>Failing a rezoning of the subject lands, the submission requests the inclusion of an SLO recognising the existing hospital and allowing sensitive expansion of same. (DRAFTDEVPLAN0187, Alan Whelan, O'Connor Whelan, Hermitage Medical Clinic)</p>	2	<p>9.4 ha</p> <p>HA-LV - ??</p>	<p>Chief Executive's Response and Recommendation</p> <p>The submission requests a change of the land use zoning for the Hermitage Medical Clinic to reflect the sites current use and to cater specifically for medical/hospital uses.</p> <p>It is noteworthy that the subject lands are located within the HA-LV zone with an objective 'to protect and enhance the outstanding character and amenity of the Liffey Valley'.</p> <p>Section 11.1.0 of the Draft Plan 2016-2022 details the land use zoning objectives of the Draft Plan, with a definition of use classes included in Schedule 5 of the Draft Plan.</p> <p>The land use classes of primary health care centre and hospital uses are 'not permitted' in the HA-LV zone and as such, the existing hospital represents a non-conforming use, as defined in the Plan.</p> <p>Section 11.1.1(vi) of the Draft Plan notes that there are instances throughout the County where land uses do not conform with the zoning objective of a site, which include instances where such uses</p> <ol style="list-style-type: none"> 1. were in existence on 1st October 1964 (i.e. prior to planning legislation) or 2. have valid permission or 3. have no permission and may or may not be the subject of enforcement proceedings. <p>Section 11.1.1(vi) of the Draft Plan notes that development proposals that relate to uses referred to under categories 1 and 2, particularly those that would intensify non-conforming uses, will be permitted only where the proposed development would not be detrimental to the amenities of the surrounding area and would accord with the principles of proper planning and sustainable development. This includes the integration of land use and transport planning.</p> <p>The function of the Hermitage Clinic facility within the County, and its position within the hierarchy of community healthcare infrastructure is recognised. Notwithstanding, having regard to the established, non-conforming use of the subject site which has been in healthcare use prior to 1963, and parameters of</p>
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			<p>development potential on the site under the provisions of Section 11.1.1(vi) of the Draft Plan, it is considered that an SLO or rezoning of the site is not required in order to facilitate the consolidation of the Hermitage Clinic facility.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>14. Submission from landowner of lands at Newlands Cross (south of N7 and east of Belgard road) outlining that the proposed 'RU' zoning for the site is inappropriate. Submitted that the lands are surrounded by development and benefit from significant public investment in adjacent infrastructure. Submission outlines that altering the zoning would have significant logistical implications and requests a SLO be adopted on the subject lands 'to provide for the development of a strategic Campus Hospital project with ancillary facilities'. (DRAFTDEVPLAN0388, Tom Walshe, Muir Associates, Therese Properties)</p>	5	12.76 ha RU	<p>Chief Executive's Response and Recommendation The submission outlines that the Rural (RU) zoning is inappropriate and should be reconsidered.</p> <p><u>SLO & Land Use Zoning</u> The subject area is zoned 'Green Belt' in the 2010 – 2016 Development Plan and is outlined as Rural (RU) in the Draft Plan. The Chief Executive notes the content of the submission including that the lands is adjoined by development and the lands benefit from significant public investment in adjacent infrastructure. The zoning of the subject lands as objective Rural (RU) maintains the established visual and environmental buffer between the Tallaght and Clondalkin. The zoning reflects the existing greenfield nature of the lands.</p> <p>The submission requests a SLO for a medical campus. The Draft Plan provides settlement, retail and urban hierarchies and the provision of the specified use at the current site would be in conflict with the Draft Plan, namely the following objectives:</p> <p>UC1 Objective 1: To direct retail, commercial, leisure, entertainment, civic, community and cultural uses into town, village, district and local centres and to achieve a critical mass of development and a mix of uses that is appropriate to</p>

			<p>each level in the urban hierarchy.</p> <p>C11 Objective 4: To direct healthcare facilities into town, village, district and local centres and to locations that are accessible by public transport, walking and cycling, in the first instance.</p> <p>UC2 Objective 1: To promote Tallaght Town Centre as the primary urban centre in the County by directing higher order retail, retail services, residential, cultural, leisure, financial, public administration, restaurants/bars, entertainment and civic uses into and adjoining the Core Retail Area of this centre.</p> <p>The Rural (RU) zoning provides for uses such as Hotel/ Hostel, Recreational – Facility, Sports Club/ Facility, Veterinary Surgery, Community Centre, Service Garage, Bed & Breakfast, Health Centre and Petrol Station as open for consideration.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>15. Submission from Tallaght Community Council includes request to use Woodies site, Belgard Road, as a park or school premises, rezoned to accommodate same if required. (DRAFTDEVPLAN0261, Gerard Stockil, Tallaght Community Council)</p>	9	<p>0.9 ha</p> <p>TC – ??</p>	<p>Chief Executive's Response and Recommendation The subject lands at the former Woodies site, Belgard Road is zoned Town Centre in the Draft Plan. The land use classes of Education and Open Space are permitted in principle within this zone.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>

Zoning - Residential (RES & RES-N)

Submission	Map No.	Site Area/Zoning	Response/Recommendation
1. Proposal to zone lands in Cookstown Industrial Estate in Tallaght for Housing. (DRAFTDEVPLAN0028, Josie Flanagan, St. Marks Silver Surfers Active Retirement Group DRAFTDEVPLAN0488, Josie Flanagan, St.Marks Silver Surfers ARA)	Map 5/9	74.2 Ha. REGEN to RES/RES-N	<p>Chief Executive's Response and Recommendation Lands within Cookstown Industrial Estate are already zoned Objective REGEN (to facilitate enterprise and/or residential-led development) under which residential uses are listed as permitted in principle.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
2. Opposed to A1 zoning of lands located to the south of Killinarden Heights and proposes that lands zoned at Whitechurch would accommodate the required housing to meet the County's needs. (DRAFTDEVPLAN0026, Gary Tyrrell, Gary Tyrrell)	Map 8/9	115.9 Ha. RES-N to no zoning	<p>Chief Executive's Response and Recommendations It is a requirement under the Planning and Development Act 2000 (as amended) for the County Development Plan, including its Core Strategy, to be consistent with the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 and to ensure that sufficient and suitable lands are zoned to meet the population and housing requirements for the County. The Core Strategy in Chapter 1 of the Draft Plan identifies a growth in population of over 26,300 people and a need for over 32,000 dwellings during the lifetimes of the County Development Plan and it is a requirement to ensure that enough lands are zoned for such need and in appropriate places.</p> <p>The lands to the south of Killinardin Heights have a long established zoning for residential development since the 1998 County Development Plan. An Action Area Plan was prepared for the area in 2000 and planning permission for significant residential development has subsequently been granted, which has commenced construction.</p> <p>The subject lands are designated within the Metropolitan Consolidation Town of Tallaght. The Settlement Strategy contained within the Regional Planning Guidelines (RPGs) identifies Metropolitan</p>

			<p>Consolidation Towns as settlement where population and housing growth should be directed, particularly to areas where there is access to high quality public transport. It is envisaged that these towns will continue to be developed as part of the consolidation of the Metropolitan Area, will continue to support key public transport corridors and will be important locations for services, retail and economic activity.</p> <p>This is reflected in the Core Strategy contained in the Draft County Development Plan, which seeks to ensure that zoned lands are located to gain maximum benefit from existing assets through consolidation and increasing densities within the existing built footprint of the Metropolitan Consolidation Towns.</p> <p>The removal of the proposed RES-N zoning objective from the lands would reduce the Draft Plan's Housing Land Capacity to a point that it would no longer be meet the housing needs of the County in accordance with the statutory requirements of the Regional Planning Guidelines and Planning and Development Legislation.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>3. Proposed re-zoning of existing serviced lands at Blessington Road, Corbally, from agricultural to residential use. (DRAFTDEVPLAN0049, Jong Kim, Masterplan Associates, Ada Murphy)</p>	Map 9	0.7 Ha. RU to RES/RES-N	<p>Chief Executive's Response and Recommendations The subject lands are located within the Rural Metropolitan Area of the County beyond the edge of the settlements defined under the Chapter 1 Core Strategy and settlement hierarchy.</p> <p>It is a requirement under the Planning and Development Act 2000 (as amended) for the County Development Plan, including its Core Strategy, to be consistent with the Regional Planning Guidelines for the Greater Dublin Area 2010-2022. The Core Strategy including its settlement strategy has been prepared in accordance with the Regional Planning Guidelines and ensures that there are sufficient zoned lands in the County to provide for housing need and that such lands are</p>

			<p>located appropriately within a defined settlement hierarchy.</p> <p>As indicated in Tables 1.8, 1.9 and 1.10 of the Draft Plan, provision has been made for 1,188 Hectares of lands that are zoned for residential development within the County. These are sufficient to provide for the housing needs of the County up to circa 2025 (40,273 dwellings). The zoning of the subject lands would therefore be surplus to the housing needs of the County during the lifetime of the Draft Plan and beyond are also not appropriate to housing development by reason of their location beyond the edge of a defined settlement.</p> <p>The Core Strategy and Regional Planning Guidelines seek to ensure that zoned lands are located to gain maximum benefit from existing assets through consolidation and increasing densities within the existing built footprint of the City, suburbs and growth towns within an identified settlement hierarchy. The subject lands are zoned to prevent a sprawl of development beyond the boundaries of the identified settlements and into rural and high amenity areas of the County.</p> <p>Zoning of sites such as the subject lands would allow for piecemeal development and shift the emphasis of consolidation away from the Metropolitan Consolidation Areas of the County (Palmerstown, Terenure, Templeogue, and Rathfarnham etc.), the Metropolitan Consolidation Towns of Tallaght, Lucan and Clondalkin, the Moderate Sustainable Growth Town of Saggart-Citywest and the Small Towns of Newcastle and Rathcoole. This would undermine the consolidation of such settlements including their existing social and physical infrastructure, services and facilities and would promote lower density development and agglomerations across greenfield sites that are more difficult to serve by such infrastructure, services and facilities.</p> <p>The zoning of the subject lands would therefore be at variance with the Core Strategy and would undermine its settlement hierarchy including its consistency with the Regional Planning Guidelines for the Greater Dublin Area.</p>
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			Recommendation: It is not recommended that the Draft County Development Plan be amended.
4. Support for proposed rezoning of lands on western side of Lock Road from zoning objective F - To preserve and provide for Open Space and Recreational Amenities in the current Plan to RES Zoning - To protect and/or improve residential amenity in the Draft Development Plan 2016-2022. (DRAFTDEVPLAN0065, Terry Gahan)	Map 1	0.1 Ha. RU to RES-N	Chief Executive's Response and Recommendations Noted. Recommendation It is not recommended that the Draft County Development Plan be amended.
5. Request rezoning of 2.5 Ha site on northern side of Kingswood Avenue adjacent to Kingswood Village from proposed objective EE - To provide for enterprise and employment related uses (Note: zoned EP2 in current Plan), to objective RES - To protect and/or improve residential amenity, or objective RES-N - To provide for new residential communities in accordance with approved area plans, to allow for residential development on these lands. (DRAFTDEVPLAN0067, Hugh Lynn, Citywest Limited)	Map 8	2.7 Ha. EE to RES/RES-N	Chief Executive's Response and Recommendations The subject lands are designated under the Draft Plan for employment uses within the Metropolitan Consolidation Town of Saggart-Citywest. The Economic Strategy contained in the Draft Plan seeks to ensure that there is a sufficient supply of zoned and serviced lands at suitable locations to accommodate future demand for enterprise and employment investment including projected employment growth across a diverse range of sectors within the County. The strategy also seeks to strengthen the alignment between employment, population and transport services. The retention of employment lands is essential to the designation of Saggart-Citywest as a Moderate Sustainable Growth Town. The Draft Plan's Core Strategy and 'Regional Planning Guidelines for the Greater Dublin Area 2010 – 2022' identify that it is critical for such growth towns to develop in a self-sufficient manner with housing growth linked to economic expansion and key sites identified for economic investment opportunities. The rezoning of the subject lands for residential development would undermine the Moderate Sustainable Growth Town Designation.

			<p>As indicated in Tables 1.8, 1.9 and 1.10 of the Draft Plan, provision has been made for 1,188 Hectares of lands that are zoned for residential development across the County. These are sufficient to provide for the housing needs of the County up to circa 2025 (40,273 dwellings). This includes capacity for 138 hectares or 4,196 additional dwellings at Saggart-Citywest. The zoning of the subject lands would therefore be surplus to the housing needs of the Saggart-Citywest area.</p> <p>Furthermore, a significant proportion of the subject lands have been identified as being at risk of flooding (approx. 0.65 Ha.). Residential development is identified as a highly vulnerable class of development under 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (2009) while employment development is identified as being less vulnerable. The zoning of the subject lands for residential development would therefore also be contrary to the recommendations of 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (2009).</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>6. Request to rezone portion of lands at Riversdale Bungalow, Lucan Road, Palmerstown from proposed zoning objective HA To protect and enhance the outstanding natural character and amenity of the Liffey Valley, Dodder Valley and Dublin Mountains areas (existing zoning Objective I) to proposed zoning objective RES - To protect and/or improve residential amenity (existing zoning objective A). (DRAFTDEVPLAN0109, Niall Melvin, Core Retail Holdings Limited)</p>	Map 2	0.5 Ha. HA-LV to RES	<p>Chief Executive's Response and Recommendations <u>Undermining of Core Strategy</u> See response to Item 3 above.</p> <p><u>Impact on Liffey Valley</u> Further to the response under Item 3 above, the subject lands are zoned HA-LV (to Protect and enhance the outstanding natural character and amenity of the Liffey Valley) and are located adjacent to the Liffey Valley Special Area Amenity Order.</p> <p>The Liffey Valley river landscapes is a key element of the County's Green Infrastructure network and hosts a rich variety of plant and animal species including protected species and numerous mature tree</p>

			<p>species. Sections of the Liffey Valley have been designated as a proposed Natural Heritage Area.</p> <p>The protection and enhancement of these landscapes and associated natural and built heritage features is a priority of the Development Plan. This is reflected under HCL Policy 10 of the Draft Plan and its associated objectives, which provide for the protection and enhancement of the Liffey Valley</p> <p>The proposed zoning would be detrimental to the Liffey Valley Landscape and undermine the policies and objectives of the County Development Plan to restrict development within the Liffey Valley and protect its visual, recreational, environmental, ecological and geological amenity value.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>7. Request rezoning of 1.9 acre site on the Killeel Road in Rathcoole, currently zoned 'B' to 'A1'. Cover letter rationale letter outlines the site is within the speed limits approach to the village, adjoins zoned lands and is inside the outer orbit Rathcoole road. (DRAFTDEVPLAN0053, Ms Noeleen Slattery)</p>	Map 8	0.8 Ha. RU to RES-N	<p>Chief Executive's Response and Recommendations Having regard to existing housing capacity in Rathcoole which is more than sufficient to meet the needs of the Rathcoole area, it is not recommended that these lands be re-zoned. See response to Item no's 3, 16, 22 and 39.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>8. Request rezoning of a small sector of land in the side garden of an end of row dwelling at Rushbrook Crescent, Dublin 6W, from GB to existing residential 'A'. (DRAFTDEVPLAN0056, Kathy & Tom McCarthy)</p>	Map 5	0.01 Ha. OS to RES	<p>Chief Executive's Response and Recommendations Residential development is listed as open for consideration under the OS zoning objective designated for the subject site under the Draft Plan.</p> <p>The proposed RES zoning objective would establish the principle of</p>

			<p>residential development and could allow such development to encroach on an area of Tymon Park adjacent to an existing footpath. It is considered that this would be prejudicial to the protection of the park and its network of walking routes</p> <p>The OS zoning objective is considered to be appropriate in this instance given that it would allow for a full assessment of any residential proposal against its impact on Tymon Park.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>9. Objection to zoning of lands opposite Lucan-Sarsfield for residential development and proposal to zone for commercial purposes or leisure centre/swimming pool on basis of capacity issues on Newcastle Road during peak travel times and previous zoning of residential lands in Lucan. (DRAFTDEVPLAN0062, Patricia Houston)</p>	Map 11	16.9 Ha RES-N to Commercial	<p>Chief Executive's Response and Recommendations <u>Core Strategy Requirements</u> It is a requirement under the Planning and Development Act 2000 (as amended) for the County Development Plan, including its Core Strategy, to be consistent with the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 and to ensure that sufficient and suitable lands are zoned to meet the population and housing requirements for the County. The Core Strategy in Chapter 1 of the Draft Plan identifies a growth in population of over 26,300 people and a need for over 32,000 dwellings during the lifetimes of the County Development Plan and it is a requirement to ensure that enough lands are zoned for such need and in appropriate places.</p> <p>The subject lands are designated within the Metropolitan Consolidation Town of Clondalkin. The lands are also located adjacent to the Dublin – Kildare rail line. The Settlement Strategy contained within the Regional Planning Guidelines (RPGs) identifies Metropolitan Consolidation Towns as settlements where population and housing growth should be directed, particularly to areas where there is access to high quality public transport. It is envisaged that these towns will continue to be developed as part of the consolidation of the Metropolitan Area, will continue to support key public transport corridors such as the Dublin –</p>

			<p>Kildare rail line and will be important locations for services, retail and economic activity.</p> <p>This is reflected in the Core Strategy contained in the Draft County Development Plan, which seeks to ensure that zoned lands are located to gain maximum benefit from existing assets through consolidation and increasing densities within the existing built footprint of the Metropolitan Consolidation Towns. It is noted that a small proportion of the lands have been identified as being at flood risk and this issue is dealt with in the responses to submissions in relation to submissions on Chapter 7 (Infrastructure and Environmental Quality).</p> <p>The subject lands are ideally positioned to help meet the population and housing needs of the County and prevent a sprawl of development beyond the boundaries of the identified settlements and into rural and high amenity areas of the County that are not served by public transport. The use of these lands purely for commercial and recreational/leisure purposes would represent an inefficient use of zoned lands located adjacent to a high capacity public transport corridor. This issue was addressed under Motion 13 of the June 2015 County Development Plan Meeting.</p> <p>The removal of the proposed RES-N zoning objective from the lands would also reduce the Draft Plan's Housing Land Capacity to a point that it would no longer meet the housing needs of the County in accordance with the statutory requirements of the Regional Planning Guidelines and Planning and Development Legislation.</p> <p><u>Permitted Uses</u> Enterprise centre, Sports Club/Facility, Health Centre, Light Industry, Recreational Facility and Shop-Local and Shop - Neighbourhood uses are all listed as permitted in principle under the proposed RES-N zoning objective of the subject lands. General Industry and Offices 100 sq.m to 1,000 sq.m.</p> <p>The proposed RES-N zoning objective therefore already allows for a</p>
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			<p>multitude of commercial and leisure/recreational uses on the subject lands. Furthermore, C7 Objective 7 of the Draft Plan seeks to provide a swimming pool on a new sports and leisure centre campus at Griffeen.</p> <p><u>Adamstown/Newcastle Road</u> A road improvement scheme for the Newcastle/Adamstown Road (R120) was approved by South Dublin County Council in November 2012. This will involve the realignment and widening of approx. 1.2 kilometres of the R120 and the 12th Lock Bridge. The CPO process for the acquisition of lands is currently ongoing.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
10. Request rezoning of a parcel of land at Old Lucan Road, Palmerstown, Dublin 22 from 'I' zone in existing County Development Plan 2010-2016 to an existing residential zoning. (DRAFTDEVPLAN0068, William Donoghue, William Donoghue & Associates Ltd, Tom Corcoran)	Map 2	0.3 Ha. HA-LV to RES	<p>Chief Executive's Response and Recommendations See responses to Items 3 and 6 above.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
11. Objects to the zoning of land at Newcastle Road (opposite Lucan Sarsfield/ Goodwins) for residential development by reason of the area being isolated from Clonburris with no easy access and the Newcastle road is gridlocked with traffic and Adamstown isn't fully finished yet. (DRAFTDEVPLAN0070, Jim Copeland, Jim Copeland)	Map 11	16.9 Ha RES-N to RU	<p>Chief Executive's Response and Recommendations See responses to Items 9 above with regard to Core Strategy Requirements and Adamstown/Newcastle Road.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
12. Objection to lands owned by Lucan Pitch & Putt club being designated as part of the extended Clonburris SDZ. Pitch and Putt club is concerned	Map 11	11.6 Ha RES-N to RU	<p>Chief Executive's Response and Recommendations See responses to Items 9 above with regard to Core Strategy Requirements and Adamstown/Newcastle Road.</p>

<p>that they could potentially be surrounded by housing developments and in those circumstances have grave concerns for the security and safety of our members and facilities. (DRAFTDEVPLAN0084, Peter Keogh, Lucan Pitch & Putt Club)</p>			<p>SDZ The Minister is currently considering a proposal for the extension of the Clonburris SDZ boundary to the R120. The lands owned by Lucan Pitch and Putt would be affected by any such extension. In the event that the extension is granted, any development within any future SDZ lands would be subject to appropriate set-backs and height restrictions relative to existing uses such as the Pitch and Putt site. Any issues relating to security and safety of members apply whatever the future uses of the land. Any future SDZ Scheme can be accommodated without impinging on the operation of the existing Pitch and Putt club.</p> <p>Impact on Pitch and Putt Club Sports Club/Facility uses are all listed as permitted in principle under the proposed RES-N zoning objective of the subject lands.</p> <p>The proposed RES-N zoning objective will not impinge upon the continued operation or development of the existing pitch and putt club and would allow it to remain as a local amenity. The proposed zoning objective would increase the range of land uses that could be realised on the subject site including residential development.</p> <p>Issues on safety and security that may arise as a result of any residential proposal adjacent to the pitch and putt club could be addressed at Development Management/planning application assessment stage.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>13. Request to rezone Round Garden Apartment Development lands at Citywest (0.3663 Ha in area) from proposed zoning objective OS (existing zoning objective F) to residential use by</p>	<p>Map 8</p>	<p>0.3 Ha OS to RES</p>	<p>Chief Executive's Response and Recommendations See response to Item 3 above.</p> <p><u>Residential Use of Golf Apartments</u></p>

<p>reason of the context of the subject lands relative to the Fortunestown LAP and development strategy for the area under the LAP and proposed Plan, the viability of property as golf apartments, the existing amenities for residents, tenancy issues, and that said rezoning would maintain the existing pattern of development in the area and that proposed under the LAP. The submission also notes that the proposed rezoning would not result in loss of public open space at this location.</p> <p>(DRAFTDEVPLAN0262, Cormac Dooley, Dooley Architects, Search 4 alpha CVBA)</p>			<p>Further to the response to Item 3 above, residential development is listed as Open for Consideration under the proposed OS zoning objective of the site in the Draft Plan and therefore provides scope for small scale residential development on the subject site.</p> <p>It should be noted that zoning relates to the principle of development uses and will not address issues of compliance with and assessment against residential development standards and the suitability of golf apartments for use as residential dwellings in terms of meeting the required dwelling sizes, room sizes, private open space provision, public open space provision and parking etc.</p> <p>This is particularly pertinent in the context of the reason for refusal of permission for development that sought to change the use of golf apartments to residential use on the subject lands (SD04A-0209 – PL06S.244266).</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>14. Submission on behalf of owner of approx. 100 ha. of lands to the south of Adamstown and Kildare Railway line proposes that the subject lands be rezoned from Objective RU (rural amenity) to Objective RES-N (new residential communities) for reason of the following:</p> <ul style="list-style-type: none"> - The continued development of Lucan and Adamstown forms part of the strategic vision for the GDA and Metropolitan Area; - The subject lands are located within the designated Metropolitan Consolidation Town of Lucan and have capacity to provide for up to 24,779 units; - Table 1.8 of the Draft Development Plan states 	Map 1/3	99.1 Ha. RU to RES-N	<p>Chief Executive's Response and Recommendations <u>Undermining of Core Strategy</u></p> <p>It is a requirement under the Planning and Development Act 2000 (as amended) for the County Development Plan, including its Core Strategy, to be consistent with the Regional Planning Guidelines for the Greater Dublin Area 2010-2022. The Core Strategy including its settlement strategy has been prepared in accordance with the Regional Planning Guidelines and ensures that there are sufficient zoned lands in the County to provide for housing need and ensures that such lands are located appropriately within a defined settlement hierarchy.</p> <p>As indicated in Tables 1.8, 1.9 and 1.10 of the Draft Plan, provision has been made for 1,188 Hectares of lands that are zoned for residential development within the County. These are sufficient to provide for the</p>

<p>a shortfall of housing output, which is contrary to Development Plan Guidelines (DEHLG, 2007) to ensure that enough land is zoned to meet residential needs for the next nine years (2016 - 2025);</p> <ul style="list-style-type: none"> - The rezoning would ensure for the consolidation of the Adamstown SDZ in a manner that is consistent with county, regional and national policies; - By reason of the proximity to the multi modal transport node at Adamstown and frontage onto the Dublin to Cork Railway Line, the rezoning would make efficient use of finite resources and will promote sustainable residential development; - The proposed zoning is supported by policy contained in the Core Strategy Chapter of Draft Plan in relation to SDZs and Metropolitan Consolidation Towns; - The proposed 'RU' zoning objective fails to acknowledge the proximity of the lands to Adamstown and public transport links and does not provide for the opportunity to maximise the potential of the subject lands. <p>(DRAFTDEVPLAN0090, Robert Nowlan , Ryan Nowlan Consuting , Bagnall Doyle McMahon Chartered Surveyors)</p>			<p>housing needs of the County up to circa 2025 (40,273 dwellings).</p> <p>The Core Strategy and Regional Planning Guidelines seek to ensure that zoned lands are located to gain maximum benefit from existing assets through consolidation and increasing densities within the existing built footprint of defined settlements.</p> <p>The subject lands are located within the Rural Metropolitan Area of the County beyond the edge of the settlements defined under the Chapter 1 Core Strategy and its settlement hierarchy. Zoning of the lands would shift the emphasis of consolidation away from the Metropolitan Consolidation Area (particularly the area of Palmerstown) and Metropolitan Consolidation Towns (particularly Lucan and Clondalkin and including SDZ planning schemes). This would undermine the consolidation of such settlements including their existing social and physical infrastructure, services and facilities and would promote lower density development and agglomerations across greenfield sites that are more difficult to serve by such infrastructure, services and facilities.</p> <p>The zoning of the subject lands would therefore be at variance with the Core Strategy and would undermine its settlement hierarchy including its consistency with the Regional Planning Guidelines for the Greater Dublin Area</p> <p><u>Extent of Proposed Lands</u></p> <p>Further to the above response, The subject lands are zoned to prevent a sprawl of development beyond the boundaries of the identified settlements including Lucan and Clondalkin and into rural areas of the County.</p> <p>The proposed RES-N zoning of the subject lands would increase the overall housing land capacity in the County by approx. 8% from 1,188 hectares to 1,288 hectares increasing housing capacity for 40,273 additional dwellings to approx. 43,600 additional dwellings. The Draft Plan already provides for approx. 18,100 dwellings in the adjacent Metropolitan Town of Lucan and Clondalkin (including 8,900 dwellings</p>
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			<p>in Adamstown SDZ and 8,000 dwellings under Clonburris SDZs).</p> <p>The zoning of the subject lands would therefore be completely surplus to the housing needs of the County for the lifetime of the Draft Plan and beyond 2025 and are also not appropriate to housing development by reason of their location beyond the edge of a defined settlement and in an area not served by existing or planned social and physical infrastructure, services and facilities.</p> <p>The zoning of the subject lands would therefore be completely inconsistent with the Regional Planning Guidelines for the Greater Dublin Area and the Core Strategy for the County and would undermine both strategies. This would be at variance with Planning and Development Legislation.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>15. Objection to residential zoning of lands opposite Lucan Sarsfields on basis of requirement for more employment in Lucan and opportunity to provide for shorter trips to work for the community. (DRAFTDEVPLAN0135, Helen Farrell)</p>	Map 4	16.8 Ha. RES-N to EE	<p>Chief Executive's Response and Recommendations See responses to Items 9 above with regard to Core Strategy Requirements and Permitted Uses.</p> <p><u>Sufficient Quantum of Employment Lands within County</u> The Economic Strategy contained in the Draft County Plan seeks to ensure that there is a sufficient supply of zoned and serviced lands at suitable locations to accommodate future demand for enterprise and employment investment across a diverse range of sectors. The strategy also seeks to strengthen the alignment between employment, population and transport services. Whilst a range of employment uses are permitted in principle or open for consideration across a range of land-use zonings, the County Development Plan seeks to guide enterprise and employment development to appropriate locations by identifying economic clusters and setting out policies and objectives for the future development of these areas.</p>

			<p>The 'Core Strategy Guidance Notes' DECLG (2010) state that County Development Plans should incorporate an appropriate level of analysis to ensure that sufficient lands are identified for employment purposes at suitable locations.</p> <p>Within this context, there are 1,300 hectares of land zoned for enterprise and employment related uses in the County. Of this 324 hectares remain undeveloped including lands in the nearby Grange Castle Business Park offering potential for future economic development in the area. There are also 250 hectares of brownfield land zoned for more intensive enterprise and/or residential led development within the County.</p> <p>The South Dublin Spatial Energy Demand Analysis (SEDA) has analysed the employment profile and sector breakdown of South Dublin County. Having regard to the job projections detailed in the South Dublin SEDA, it is considered that the quantum of lands zoned for enterprise and employment uses within the County is appropriate and sufficient to serve the economic and employment needs of the County.</p> <p>The zoning of the subject lands solely for employment uses would exceed the economic and employment needs of the County and would be surplus to requirement. This would undermine the development of other enterprise and employment including the Grange Castle Business Park and would be at variance with the Economic Strategy for the County and the recommendations of the 'Core Strategy Guidance Notes' (2010).</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
16. Submission requests that lands off Stoney Lane, Rathcoole be rezoned from objective 'B' (rural	Map 8	RU to RES-N 10.2 Ha.	<p>Chief Executive's Response and Recommendations See responses to Items 3 and 7 above.</p>

<p>amenity and agriculture) to objective 'A1' (residential) by reason of its location adjacent to existing residential zoned lands; its unsustainable use for agriculture; location within village speed limit; location within road proposal to orbit Rathcoole; and potential to consolidate a sustainable residential area within the village in conjunction with adjoining lands. Submission also indicates request to zone lands to the south of Rathcoole along proposed Western Dublin Orbital Route (south).</p> <p>(DRAFTDEVPLAN0166, John M Morris, John Martin Morris B Arch MRIAI, Joe & Patricia Boyle)</p>			<p><u>Rathcoole's Housing Capacity</u></p> <p>Further to the response to Item 3 above, the subject lands are zoned to prevent a sprawl of development beyond the core boundary of Rathcoole and into rural areas of the County. Rathcoole has been designated as a Small Town under the Draft Plan's Core Strategy in accordance with the requirements of the 'Regional Planning Guidelines for the Greater Dublin Area 2010-2022'.</p> <p>It is stated under the Regional Planning Guidelines that levels of growth in all small towns shall be managed in line with the ability of local services to cater for any growth, responding to local demand. The guidelines on 'Sustainable Residential Development in Urban Areas' (2009) also advise that Small Towns should be developed as compact towns and should prioritise the development of brownfield and backland sites and expansion should be based on a number of well integrated sites.</p> <p>The Draft Plan already provides for a housing land capacity of 45 hectares or approx. 1,000 additional houses for Rathcoole, which will cater for its housing needs up to 2025.</p> <p><u>Addition to Housing Capacity</u></p> <p>The proposed RES-N zoning of both sites that are the subject of the submission would increase land capacity in Rathcoole by approx. 23% to 55 hectares increasing housing capacity in Rathcoole to approx. 1,200 additional dwellings.</p> <p>The zoning of the sites would therefore be completely surplus to the housing needs of Rathcoole during the lifetime of the Draft Plan and beyond 2025. The subject lands are also not appropriate to housing development by reason of their location beyond the edge of a defined settlement and in an area not served by existing or planned social and physical infrastructure, services and facilities.</p> <p>The zoning of the subject lands would therefore be completely</p>
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			<p>inconsistent with the Regional Planning Guidelines for the Greater Dublin Area and the Core Strategy for the County and would undermine both strategies. This would undermine the sustainable development of Rathcoole and would be at variance with Planning and Development Legislation.</p> <p><u>Impact on Alignment Western Dublin Orbital Route & Flooding</u> The lands that are proposed for zoning along the proposed Western Dublin Orbital Route (south) run along the route of the proposed indicative road alignment for a distance of approximately 0.6 kilometres. The zoning of the subject lands for residential development would significantly prejudice the finalisation of a more exact road alignment for the Orbital Route.</p> <p>Areas of the subject site have also been identified as being at risk of flooding and the zoning of such areas of land for residential development would be contrary the recommendations of 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (2009).</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
17. Decision to zone lands to south of Dublin-Cork Railway Line on eastern side of R120 is welcomed by land owner. It is indicated that a requirement under the proposed 'RES-N' zoning objective to prepare a further plan for a small area would not be appropriate and that the preparation of a design statement would suffice. It is proposed that the lands be rezoned to Objective 'RES', which would remove the requirement for a further plan and facilitate the provision of housing within a shorter timescale.	Map 4	16.8 Ha RES-N to RES.	<p>Chief Executive's Response and Recommendations Area Plans are necessary for areas where new development areas require a co-ordinated approach particularly areas that are likely to experience large scale development or are in need of regeneration. This is pertinent for lands that are zoned RES-N and it is within this context that the RES-N zoning objective seeks to provide for new residential communities in accordance with approved area plans.</p> <p>This is consistent with the emergence of a plan-led approach to planning, as identified under the 'Planning Policy Statement' (DOE, 2015), particularly in relation to areas that are designated for significant</p>

<p>(DRAFTDEVPLAN0197, Stephen Little, Stephen Little & Associates, Castlethorn Construction)</p>			<p>development. Section 19 of the Planning and Development Act 2000 (as amended) also makes it a mandatory requirement to make local area plans for certain areas.</p> <p>The Local Area Plans Guidelines for Planning Authorities (DECLG, 2013) advise that "... statutory local area plans provide for proper consultation with the public and statutory consultees, and are subject to approval by elected members and together with the Development Plan, establish a key element of the policy context for making decisions on planning and appeals." This reflects the opportunities afforded under the Local Area Plan process for third parties including community groups to engage with the plan making process, which can also be applied to non-statutory plans.</p> <p>Design statements relate to more detailed aspects of an individual site and development such as building materials and are generally used to demonstrate compliance with the requirements of a Local Area Plan, non-statutory plan or County Development Plan and therefore complement the plan-led approach. Within this context, the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (DECLG, 2009) advise that design statements "...should address all relevant development plan or local area plan design policies and objectives, and relate them to the site."</p> <p>Design statements are not subject to statutory public consultation procedures and are not sufficiently strategic in nature to replicate the benefits of Local Area Plans in terms of ensuring for a co-ordinated approach between adjoining developments and involving local communities, which can also be applied to non-statutory plans.</p> <p>The suggested use of design statements to obviate the need for Local Area Plans or non-statutory plans would therefore be contrary to statutory requirements prescribed under Planning Legislation and ministerial guidelines with regards to Local Area Plans and the plan led approach to significant development areas.</p>
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			Recommendation It is not recommended that the Draft County Development Plan be amended.
18. Request for rezoning of lands between Newcastle Manor and Greenoge business park from proposed zoning objective RU to proposed zoning objective RES-N, in line with CS4 Objective 2, and to encourage new residential and retail development in the village to act as a catalyst for the reenergising of Newcastle. (DRAFTDEVPLAN0352, Johny Janssens)	Map 3/7	16.2 Ha. RU to RES-N	Chief Executive's Response and Recommendations See responses to Item 3 above. <u>Newcastle's Role as a Small Town</u> Further to the response to Item 3 above, the subject lands are zoned to prevent a sprawl of development beyond the core boundary of Newcastle and into rural areas of the County. The lands also create a visual and environmental buffer between the Village of Newcastle and Greenoge Industrial Estate. Newcastle has been designated as a Small Town under the Draft Plan's Core Strategy in accordance with the requirements of the 'Regional Planning Guidelines for the Greater Dublin Area 2010-2022'. It is stated under the Regional Planning Guidelines that levels of growth in all small towns shall be managed in line with the ability of local services to cater for any growth, responding to local demand. The guidelines on 'Sustainable Residential Development in Urban Areas' (2009) also advise that Small Towns should be developed as compact towns and should prioritise the development of brownfield and backland sites and expansion should be based on a number of well integrated sites. <u>Addition to Newcastle's Housing Capacity</u> The Draft Plan already provides for a housing land capacity of 28 hectares or approx. 700 houses for Newcastle, which will cater for its housing needs up to 2025. A comprehensive Local Area Plan has been prepared for these lands to ensure that are developed in an appropriate and phased manner that is linked to the provision of social and physical infrastructure, services and facilities. The proposed RES-N zoning of the subject lands would increase land capacity in Newcastle by approx. 60% to 44 hectares increasing

			<p>housing capacity in Newcastle to approx. 1,100 additional dwellings.</p> <p>The zoning of the subject lands would therefore be completely surplus to the housing needs of Newcastle within the lifetime of the Draft Plan and beyond 2025 and are also not appropriate to housing development by reason of their location beyond the edge of a defined settlement and in an area not served by existing or planned social and physical infrastructure, services and facilities.</p> <p>The zoning of the subject lands would therefore be completely inconsistent with the Regional Planning Guidelines for the Greater Dublin Area and the Core Strategy for the County and would undermine both strategies. This would undermine the sustainable development of Newcastle, the realisation of its Local Area Plan and would be at variance with Planning and Development Legislation.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>19. Objection to rezoning of lands at Lucan Pitch and Putt Club for residential development by reason of loss of amenity. (Joanna Tuffy DRAFTDEVPLAN0239, Joanna Tuffy TD DRAFTDEVPLAN0240, Joanna Tuffy TD DRAFTDEVPLAN0241, Joanna Tuffy TDDRAFTDEVPLAN0257, Sandra Keogh)</p>	Map 4	1.89 Ha. RES-N to RU	<p>Chief Executive's Response and Recommendations See responses to Items 9 above with regard to Core Strategy Requirements and Item 12 above with regard to Impact on Pitch and Putt Club.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>20. Objection to 'residential rezoning' of Edmondstown Park from its current zoning as agricultural land. (DRAFTDEVPLAN0383, Angela O'Donoghue, Glendoher & District Residents Association DRAFTDEVPLAN0384, Angela)</p>	Map 10	13.22 Ha. RES-N to RU	<p>Chief Executive's Response and Recommendations <u>Core Strategy Requirements</u> It is a requirement under the Planning and Development Act 2000 (as amended) for the County Development Plan, including its Core Strategy, to be consistent with the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 and to ensure that sufficient and</p>

<p><u>O'Donoghue, Rathfarnham Area Residents Association</u>)</p>			<p>suitable lands are zoned to meet the population and housing requirements for the County. The Core Strategy in Chapter 1 of the Draft Plan identifies a growth in population of over 26,300 people and a need for over 32,000 dwellings during the lifetimes of the County Development Plan and it is a requirement to ensure that enough lands are zoned for such need and in appropriate places.</p> <p>The subject lands are designated within the Metropolitan Consolidation Area of the Dublin Gateway as identified under the Regional Planning Guidelines. It is policy of the Regional Planning Guidelines (RPGs) to gain maximum benefit from existing assets in the Metropolitan Consolidation Area, including public transport and social infrastructure, through consolidation within the exiting built footprint of the City and the Inner Suburbs. This is seen as particularly important as falling occupancy levels and aging populations are placing the viability existing services and facilities such as schools across the Metropolitan Area at risk.</p> <p>The RPGs seek to direct a significant portion of anticipated population and economic growth for the Greater Dublin Area into the Metropolitan Consolidation Area of the Dublin Gateway. This is reflected in the Core Strategy contained in the Draft County Development Plan, which seeks to ensure that there are sufficient zoned lands located within the Metropolitan Consolidation Area in the interest of the proper planning and sustainable development of the County and the Dublin Gateway particularly areas of the County that are capable of being served by high quality social and physical infrastructure, services and facilities.</p> <p>The subject lands are ideally positioned to help meet the population and housing needs of the County in a manner that strengthens and consolidates the inner suburban area of the Dublin Gateway and prevents a sprawl of development beyond the boundaries of the identified settlements and into rural and high amenity areas of the County.</p> <p>The removal of the proposed RES zoning objective from the lands</p>
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			<p>would also reduce the Draft Plan's Housing Land Capacity, particularly in the Metropolitan Consolidation Area, to a point that it would no longer meet the housing needs of the County in sustainable locations in accordance with the statutory requirements of the Regional Planning Guidelines and Planning and Development Legislation.</p> <p><u>Impact on Agricultural Lands</u> Agriculture uses are all listed as open for consideration under the proposed RES zoning objective of the subject lands and the proposed zoning does not affect the exemptions for agricultural development that are prescribed under the Planning and Development Regulations, 2001.</p> <p>The proposed RES zoning objective will not significantly impinge upon the continued operation or development of the existing agricultural lands. The proposed zoning objective increases the range of land uses that could be realised on the subject site including residential development.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>21. Request for rezoning of lands at Finnstown, Lucan to west of Lock Road and adjoining Adamstown SDZ, from proposed zoning objective OS (zoning objective F in current Plan) to proposed zoning objective RES-N on basis that the subject lands are:</p> <ul style="list-style-type: none"> - inaccessible to the public for use as recreational open space, - surrounded by land either developed to date or identified for future development, - fully serviced and accessible via the R120 Newcastle/Lock Road and Tandy's Lane, - best placed to cater for low density residential 	Map 1	15.8 Ha. OS to RES-N	<p>Chief Executive's Response and Recommendations The Core Strategy including its settlement strategy has been prepared in accordance with the Regional Planning Guidelines and ensures that there are sufficient zoned lands in the County to provide for housing need.</p> <p>The Core Strategy contained in the Draft County Development Plan, seeks to ensure that zoned lands are located to gain maximum benefit from existing assets through consolidation and increasing densities within the existing built footprint of the Metropolitan Consolidation Towns.</p> <p>As indicated in Tables 1.8, 1.9 and 1.10 of the Draft Plan, provision has</p>

<p>development within the southern Lucan area, having regard to the existing and proposed pattern of development on adjacent lands including Adamstown,</p> <ul style="list-style-type: none"> - have been zoned for open space and recreational use for years but are not used as such, and - if rezoned will increase permeability and connectivity of the area, provide for large scale recreational amenity abutting the subject lands, and potentially provide for some type of community/recreational use. <p>(DRAFTDEVPLAN0353, Tracy Armstrong, Fenton Associates, Maplewood Residential)</p>			<p>been made for 1,188 Hectares of lands that are zoned for residential development within the County. These are sufficient to provide for the housing needs of the County up to circa 2025 (40,273 dwellings). This includes for 217 Ha. of lands within Lucan (including Adamstown), which will provide an additional 8,300 dwellings.</p> <p>It is noted that the subject lands are located within the boundary of the Metropolitan Consolidation Town of Lucan but are considered to be surplus to requirement during the lifetime of the Draft Plan. The zoning of the lands for low density residential development would shift the emphasis away from the consolidation of Lucan in accordance with the requirements of the Regional Planning Guidelines and the Core Strategy and would also undermine the realisation and completion of the Adamstown SDZ planning scheme.</p> <p>The zoning of the subject lands would therefore be surplus to housing need and would undermine the consolidation of the Metropolitan Consolidation Town of Lucan</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>22. Submission on behalf of landowner requests that 3.04 hectares of land off Kilteel Road, Rathcoole be zoned from Objective 'B' (rural amenity and agriculture) to Objective 'A1' (new residential communities) by reason of location near water mains and transport and in order to facilitate road proposals in the area.</p> <p>(DRAFTDEVPLAN0337, Paul Doyle, J.P. & M. Doyle, Mr Jim Brown)</p>	Map 7/8	3 Ha RU to RES-N	<p>Chief Executive's Response and Recommendations See responses to Item's 3, 7 and 16 above in Relation to Rathcoole's Housing Capacity.</p> <p><u>Additional Housing Capacity</u> Further to the response to Items 3 and 16 above, the Draft Plan already provides for a housing land capacity of 45 hectares or approx. 1,000 additional houses for Rathcoole, which will cater for its housing needs up to 2025.</p> <p>The proposed RES-N zoning of the subject lands would increase land capacity in Rathcoole by an additional 60 dwellings. The zoning of the</p>

			<p>subject lands would therefore be surplus to the housing needs of Rathcoole for the lifetime of the Draft Plan and beyond 2025. The subject lands are also not appropriate to housing development by reason of their location beyond the edge of a defined settlement and in an area not served by existing or planned social and physical infrastructure, services and facilities.</p> <p>The zoning of the subject lands would therefore be completely inconsistent with the Regional Planning Guidelines for the Greater Dublin Area and the Core Strategy for the County and would undermine both strategies. This would undermine the sustainable development of Rathcoole and would be at variance with Planning and Development Legislation.</p> <p><u>Impact on Alignment Western Dublin Orbital Route</u> The subject to the zoning proposals are traversed by the indicative road alignment for the Western Dublin Orbital Route. The zoning of the subject lands for residential development would prejudice the finalisation of a more exact road alignment for the Orbital Route.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
23. This submission relates to lands at the Carmelite Convent, Firhouse Road within the ownership of the Carmelite Sisters. The submission seeks the retention of the residential zoning from the 2010 Plan of surplus lands at Carmelite Monastery lands, Firhouse Road, Firhouse for residential purposes. The submission outlines that the lands are appropriate for residential zoning and are serviced by infrastructure and public transport and have no notable constraints.	Map 9	2.34 Ha. HA-DV to RES	<p>Chief Executive's Response and Recommendations <u>Emphasis on Protecting Dodder Valley</u> The Dodder Valley river landscapes is a key element of the County's Green Infrastructure network and hosts a rich variety of plant and animal species including protected species and numerous mature tree species. Sections of the Dodder Valley have been designated as a proposed Natural Heritage Area.</p> <p>The subject lands have been zoned objective HA-DV (to Protect and enhance the outstanding natural character and amenity of the Dodder Valley) under the Draft Plan by reason of their location within the</p>

<p>- The submission also seeks the retention of a specific local objective in the South Dublin County Development Plan 2016 - 2022 to provide for residential development on approximately 2 hectares of land in the vicinity of the Carmelite Convent, Firhouse in conjunction with the bringing into public ownership of part of the Dodder Valley lands as public open space. The SLO provides a unique opportunity for the local community.</p> <p>(DRAFTDEVPLAN0189, John Tierney, John Spain Associates, Carmelite Sisters)</p>			<p>Dodder Valley and proximity to the Dodder Valley pNHA.</p> <p>The Dodder Valley is now recognised under the 'Landscape Character Assessment Of South Dublin County' (2015) as having a High Landscape Value and High Landscape Sensitivity. The Draft Plan includes a renewed emphasis on strengthening the amenity value of the Dodder Valley and the protection of its landscapes and natural and built heritage features. This is considered to be particularly pertinent in relation to preventing a spread of further residential development into the river valley landscape.</p> <p>The protection and enhancement of the Dodder Valley landscape and its associated natural and built heritage features is reflected under HCL Policy 10 of the Draft Plan and its associated objectives, which provide for the protection and enhancement of the Dodder Valley. Policy HCL10 Objective 6 refers specifically to the key role of the Dodder Valley and the need to support the continued development of the Dodder Valley as an area of special amenity.</p> <p>The rezoning of the subject lands as Objective RES would allow for further residential development within the Dodder Valley Landscape that would undermine the policies and objectives of the Draft Plan to protect its visual, environmental and ecological amenity value.</p> <p><u>Provisions of Core Strategy</u></p> <p>The Core Strategy including its settlement strategy has been prepared in accordance with the Regional Planning Guidelines and ensures that there are sufficient zoned lands in the County to provide for housing need including housing for older people.</p> <p>As indicated in Tables 1.8, 1.9 and 1.10 of the Draft Plan, provision has been made for 1,188 Hectares of lands that are zoned for residential development within appropriate areas the County. These are sufficient to provide for the housing needs of the County up to circa 2025 (40,273 dwellings). This includes for 313 Ha. of lands within the Metropolitan Consolidation Area of the County, which will provide an additional 9,500</p>
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			<p>dwellings.</p> <p>The subject lands are considered to be surplus to requirement of the Metropolitan Consolidation Area particularly In the context of their location within a high amenity area.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>24. It is requested that the lands at Boherboy which are currently zoned 'GB' Green Belt in the South Dublin Development Plan 2010 - 2016 and are proposed to be zoned 'RU in the Draft Development Plan 2016-2022 be zoned 'RES-N' in the adopted Development Plan and that an Action Area Plan be prepared for the subject lands and adjoining lands on Boherboy that are proposed to be zoned 'RU'. Proposal outlines that the land is located a similar distance from the village centre of Saggart as other RES-N lands and is residential rather rural or agricultural in nature. (DRAFTDEVPLAN0249, Joe Bonner, Joe Bonner Planning, Annod Ltd.)</p>	Map 8	2.66 Ha. RU to RES-N	<p>Chief Executive's Response and Recommendations See response to Item 3 above.</p> <p><u>Additional Housing Capacity</u> Further to the response to Items 3, provision has been made under the Draft Plan for 138 hectares or 4,196 additional dwellings at Saggart-Citywest.</p> <p>The proposed RES-N zoning of the subject lands would increase land capacity adjacent to Saggart-Citywest by an additional 53 dwellings. The zoning of the subject lands would therefore be surplus to the housing needs of Saggart-Citywest for the lifetime of the Draft Plan and beyond 2025. The subject lands are also not appropriate to housing development by reason of their location outside the edge of a defined settlement and in an area not served by existing or planned social and physical infrastructure, services and facilities.</p> <p>The zoning of the subject lands would therefore be inconsistent with the Regional Planning Guidelines for the Greater Dublin Area and the Core Strategy for the County and would undermine both strategies. This would undermine the sustainable development of Saggart -Citywest and would be at variance with Planning and Development Legislation.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be</p>

			amended.
<p>25. Request to rezone lands (2.75 Ha in area) at Green Lane, Rathcoole from proposed zoning objective OS to proposed zoning objective RES-N on basis that the lands:</p> <ul style="list-style-type: none"> - were zoned AI under the South Dublin County Development Plan 2004-2010 and the current Plan, which is equivalent to the proposed RES-N zoning objective under the draft 2010-2016 Plan, - are adjacent to previously approved residential development, and was annotated for 'possible future development' under same, - appear to be included in the Core Strategy land capacity figures of the Plan, - are ideally located for residential development and unconstrained by factors such as flooding, existing visual amenity, etc. <p>(DRAFTDEVPLAN0499, James McNerney, Brian Prendergast)</p>	Map 8	2.88 Ha. OS to RES-N	<p>Chief Executive's Response and Recommendations</p> <p>It is accepted that the subject lands are zoned RES-N under the current County Development Plan (2010 – 2016), are served by existing residential roads, located within the designated boundary of the Small Town of Rathcoole close to existing services and facilities and would provide for a logical infilling with adjoining residential development without significant planning constraints. Residential development on the subject lands would promote consolidation within a designated urban settlement in accordance with the objectives of the Core Strategy.</p> <p>The subject lands were also included in the calculation of the Core Strategy's Housing Land Capacity for the County and the Small Town of Rathcoole under Tables 1.8, 1.9 and 1.10 of the Draft Plan. This is clearly illustrated on Map 1.3 of the Draft Plan.</p> <p>Recommendation</p> <p>Amend the zoning of the subject lands from Objective Open Space (OS) to Objective RES –N 'To provide for new residential communities in accordance with approved area plans'.</p>
<p>26. Submission on behalf of landowner requests that a substantial area of lands at Aderrig to the west of Adamstown be designated for residential development by reason of the following:</p> <ul style="list-style-type: none"> - Need for additional residential zoned land in the County to cater for future population growth within the Dublin region and meet RPG targets. - The lands are located on the Dublin - Kildare Rail Line and would accord with the principle of integrating land use and transport planning; - The lands form a natural and logical extension of the Adamstown SDZ and can utilise existing physical, social and community infrastructure 	Map 1	140 Ha. RU & OS to	<p>Chief Executive's Response and Recommendations</p> <p>See response to Item 14 above in relation to Undermining of Core Strategy.</p> <p><u>Extent of Proposed Lands</u></p> <p>Further to the response under Item 14 above, the subject lands are zoned to prevent a sprawl of development beyond the boundaries of the identified settlements including Lucan and Clondalkin and into rural areas of the County.</p> <p>The proposed RES-N zoning of the subject lands would increase the overall housing land capacity in the County by approx. 12% from 1,188 hectares to 1,328 hectares increasing housing capacity for 40,273</p>

<p>including the Kildare Rail Project and Adamstown Train Station;</p> <ul style="list-style-type: none"> - The lands offer a strategic land bank for medium to long terms delivery of housing in the County and Region; - Proposed upgrades along the Dublin - Kildare Line will further improve frequencies and capacity of train services for the area; - Development of the lands would help deliver the section of the Western Dublin Orbital Route (north) that traverses the lands; - The lands are not subject to development constraints; <p>(DRAFTDEVPLAN0343, John Spain Associates, John Spain Associates, Tierra Ltd DRAFTDEVPLAN0185, John Spain Associates, John Spain Associates, Tierra Ltd.)</p>			<p>additional dwellings to approx. 45,000 additional dwellings. The Draft Plan already provides for approx. 18,100 dwellings in the adjacent Metropolitan Town of Lucan and Clondalkin (including 8,900 dwellings in Adamstown SDZ and 8,000 dwellings under Clonburris SDZs).</p> <p>The zoning of the subject lands would therefore be completely surplus to the housing needs of the County for the lifetime of the Draft Plan and beyond 2025 and are also not appropriate to housing development by reason of their location beyond the edge of a defined settlement and in an area not served by existing or planned social and physical infrastructure, services and facilities.</p> <p>The zoning of the subject lands would therefore be completely inconsistent with the Regional Planning Guidelines for the Greater Dublin Area and the Core Strategy for the County and would undermine both strategies. This would be at variance with Planning and Development Legislation.</p> <p>Areas of the subject lands have also been identified as being at risk of flooding and the zoning of such areas of land for residential development would be contrary the recommendations of 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (2009).</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>27. Request to rezone lands at the Eastern Golf Course, Citywest, Saggart from proposed zoning objective OS to proposed zoning objective RES-N on the basis that the subject lands:</p> <ul style="list-style-type: none"> - have not been used as a hotel for a number of years and therefore underutilised, - are proximate to existing services, facilities, 	<p>Map 8</p>	<p>14.23 Ha. OS to RES-N</p>	<p>Chief Executive's Response and Recommendations See response to Item 3 above.</p> <p><u>Additional Housing Capacity</u> Further to the response to Items 3, provision has been made under the Draft Plan for 138 hectares or 4,196 additional dwellings at Saggart-Citywest.</p>

<p>public transport infrastructure and the N7 Naas Road,</p> <ul style="list-style-type: none"> - are within the immediate vicinity of Saggart Village and thus provide an appropriate extension to Saggart Village to meet the housing requirements of the RPGs, and - are more suitable for residential development than some 'capacity sites' identified in the Plan. <p>((DRAFTDEVPLAN0350, Gavin Lawlor, Tom Phillips & Associates, Cape Wrath Hotel Limited)</p>			<p>The proposed RES-N zoning of the subject lands would increase land capacity adjacent to Saggart-Citywest by 10% and would provide for an additional 230 dwellings. The zoning of the subject lands would therefore be surplus to the housing needs of Saggart-Citywest for the lifetime of the Draft Plan and beyond 2025. The subject lands are also not appropriate to housing development by reason of their location outside the edge of a defined settlement and in an area not served by existing or planned social and physical infrastructure, services and facilities.</p> <p>The zoning of the subject lands would therefore be inconsistent with the Regional Planning Guidelines for the Greater Dublin Area and the Core Strategy for the County and would undermine both strategies. This would undermine the sustainable development of Saggart -Citywest and would be at variance with Planning and Development Legislation.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>28. Objection from landowner to zoning of Edmondstown Park from zoning objective 'B' to zoning objective 'RES' (residential) by reason of the current use of lands for agriculture; existence of trees of significant amenity value and development plan policy to protect such trees; and the location of the lands within the curtilage of a protected structure (Edmondstown Park House - Ref 343). (DRAFTDEVPLAN0490, Patrick & Andrea Leonard)</p>	Map 10	13.2 Ha. RES to RU	<p>Chief Executive's Response and Recommendations See response to Item 20 above in relation to Core Strategy Requirements and Impact on Agricultural Lands.</p> <p><u>Impact on Trees and Protected Structure</u> G2 Objective 9 of the Draft Plan seeks to preserve, protect and augment trees, groups of trees, woodlands and hedgerows within the County by incorporating them within design proposals. This is supported by HCL 17 Objective 2, which seeks to protect existing trees, hedgerows, and woodlands that are of amenity value and ensure that proper provision is made for their protection and management.</p> <p>HCL Policy 3 of the Draft Plan and its associated objectives also ensures for the conservation and protection of Protected Structures and</p>

			<p>Careful consideration of any proposals for development that would affect the special character or appearance of a Protected Structure including its historic curtilage.</p> <p>Further to the concerns in relation to the potential of the zoning to impact on existing trees and the Protected Structure at Edmondstown, the provisions of the Draft Plan would ensure that existing trees of high amenity value are incorporated into any future residential development proposals on the subject lands and that any such development is designed and sited appropriately to respond to and respect the setting and curtilage of Edmondstown Park House.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
29. Objection from landowner to zoning of lands from Agriculture to Residential Amenity by reason of the use of lands for agriculture, unrealistic expectations in terms of future use of lands, protected structure status, use of lands for school visits, existence of specimen trees and Development Plan policy to protect such trees. (DRAFTDEVPLAN0491, John A Leonard)	Map 10	13.2 Ha. RES to RU	<p>Chief Executive's Response and Recommendations See response to Items 20 and 28 above.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
30. Submission requests rezoning of lands at Saggart (to southwest of Millrace and Crosforge developments) from proposed zoning objective RU to proposed zoning objective RES on the basis that the subject site would be particularly suited to accommodate a nursing home. (DRAFTDEVPLAN0502, Ailís Strang, Fewer Harrington & Partners , Briarsgate Developments)	Map 8	2.72 Ha RU to RES	<p>Chief Executive's Response and Recommendations See response to Item 3 above.</p> <p><u>Additional Housing Capacity & Flooding</u> Further to the response to Items 3, provision has been made under the Draft Plan for 138 hectares or 4,196 additional dwellings at Saggart-Citywest.</p> <p>The zoning of the subject lands would therefore be surplus to the housing needs of Saggart-Citywest for the lifetime of the Draft Plan and</p>

			<p>beyond 2025. The subject lands are also not appropriate to housing development by reason of their location outside the edge of a defined settlement and within a flood zone. The majority of the lands are identified as being at risk of flooding.</p> <p>The zoning of the subject lands would therefore be inconsistent with the Regional Planning Guidelines for the Greater Dublin Area and the Core Strategy for the County and would be contrary to the recommendations of 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (2009). The proposed zoning is therefore at variance with Planning and Development Legislation.</p> <p><u>Policy for Social Inclusion and Integration of Housing for Older People</u> Further to the suggested use of the subject lands for a nursing home development, the Draft Plan seeks to provide for the housing needs of older people and to provide a range of accommodation choices within their own communities. The need to provide accommodation for older people has also been factored into the extent of lands that have been zoned for residential development within the County and the zoning of the subject lands would be surplus to requirement.</p> <p>Housing Policy 3 (Housing for Older People) and H3 Objective 1 of the Draft County Development Plan supports the provision of accommodation (independent, semi-independent or nursing home accommodation) for older people in established residential and mixed use areas that offer a choice and mix of accommodation types at locations that are proximate to services and amenities including pedestrian paths, local shops, parks and public transport.</p> <p>Further to the issue of flooding, the subject lands are also not appropriate to housing development particularly housing for older people by reason of their location outside the edge of a defined settlement and in an area not served by existing or planned social and physical infrastructure, services or facilities.</p> <p>Recommendation:</p>
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			It is not recommended that the Draft County Development Plan be amended.
31. Supports the RES zoning in the Draft Plan for the lands at Ardeevin in Lucan. Outlines that the site is adjoining existing residential development, represents infill development, accords with the sequential approach and is located close to necessary services, public transport and schools. (DRAFTDEVPLAN0356, Brendan Gallagher, Landowner)	Map 1	1.05 Ha. OS to RES	<p>Chief Executive's Response and Recommendations Submission noted.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
32. Request to rezone lands at eastern extent of Fairgreen, Saggart, (0.09 Ha in area) from zoning objective GB [note: lands are subject to proposed zoning objective OS in Draft Plan] to zoning objective A, on the basis that the current zoning is inappropriate due to size and location relative to the adjacent Green Belt area. (DRAFTDEVPLAN0494, Colm McGrath, Essential Services Ltd., Denis & Sinead Casey)	Map 8	0.08 Ha. OS to RES	<p>Chief Executive's Response and Recommendations The subject site is sandwiched between two residential developments at the end of a residential cul-de-sac. The site is considered to be within the designated boundary of the Moderate Sustainable Growth Town of Saggart-Citywest close to existing services and facilities and would provide for a logical infilling of surrounding residential development without significant planning constraints. Residential development on the subject lands would allow for consolidation of residential development within a designated growth settlement in accordance with the objectives of the Core Strategy.</p> <p>Recommendation Zone the subject site from Objective OS to Objective RES-N under the Draft County Development Plan.</p>
33. Proposal to zone 3.5ha for Residential in the proposed HA-LV zone at Palmerstown. The submission outlines that the site is a suitable infill development site for residential development by virtue of infrastructure, site development services, amenity and local community facilities. The report details that the site is outside the SAAO and adjoins residential development.	Map 2	3.5 Ha. HA-LV to RES	<p>Chief Executive's Response and Recommendations <u>Undermining of Core Strategy</u> See response to Item 3 above.</p> <p><u>Impact on Liffey Valley</u> Further to the response under Item 3 above, the subject lands are zoned HA-LV (to Protect and enhance the outstanding natural character and amenity of the Liffey Valley) and are located adjacent to the Liffey</p>

<p>(DRAFTDEVPLAN0505, Denis Creedon, Denis Creedon & Co Ltd, Jean, Juliet, Maria & Donal McCarthy & Eleanor Burns)</p>			<p>Valley Special Area Amenity Order.</p> <p>The Liffey Valley river landscapes is a key element of the County's Green Infrastructure network and hosts a rich variety of plant and animal species including protected species and numerous mature tree species. Sections of the Liffey Valley have been designated as a proposed Natural Heritage Area.</p> <p>The protection and enhancement of these landscapes and associated natural and built heritage features is a priority of the Development Plan. This is reflected under HCL Policy 10 of the Draft Plan and its associated objectives, which provide for the protection and enhancement of the Liffey Valley</p> <p>The proposed zoning would significantly denude the Liffey Valley Landscape with a site capacity for approximately 100 dwellings and would undermine the policies and objectives of the County to restrict development within the Liffey Valley and protect its visual, recreational, environmental, ecological and geological amenity value.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>34. Proposal for the zoning of a 2.5ha plot of land on the periphery of Citywest Business Campus and Kingswood Village from Employment and Enterprise (EE) to Residential. Submission details that the site would provide a link between adjacent office and Kingswood Village. The lands have all key infrastructure in place and well served in terms of amenities, schools, public transport and road access. (DRAFTDEVPLAN0278, Hugh Lynn, Davy Hickey Properties, Citywest Ltd)</p>	<p>Map 8</p>	<p>2.7 Ha. EE to RES</p>	<p>Chief Executive's Response and Recommendations See response to Item 5 above.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>

35. Submission relates to site on Kiltipper Road, c.2 Ha in area, comprising an irregularly shaped site with existing residential dwelling and two small out-buildings. Submission notes that the majority of the site is subject to existing zoning objective B, with a small portion of the lands at the northern end of the site subject to current zoning objective A1. Submission requests rezoning of subject site and adjacent lands along Kiltipper Road from RU to RES-N on basis that: - the current zoning of the subject site and adjoining lands for agricultural use is anomalous and neither reflective of the existing use nor any potential use; - the lands are now characterised by their proximity to new residential development and are effectively part of Suburban Dublin; - the lands represent a logical inclusion, from a planning perspective, of lands identified for future residential development; and - there are no practical constraints to their suitability for residential development and their rezoning would be consistent with the proper planning and sustainable development of the area. (DRAFTDEVPLAN0111, John Gannon, Tom Phillips + Associates, Fergal O'Gara)	Map 9	0.3 Ha. RU to RES-N	Chief Executive's Response and Recommendations See response to Item 3 above. Recommendation It is not recommended that the Draft County Development Plan be amended.
36. Request to maintain zoning objective RES on lands to the north of Watery Lane and south of New Nangor Road (c 3 Ha in area), as proposed under the Draft Plan. (DRAFTDEVPLAN0125, John Murphy, BMA)	Map 5	3.2 Ha. RES	Chief Executive's Response and Recommendations The submission on the subject site is noted. Further to a review of the Stage 1 Stage Flood Risk Assessment it is noted that the majority (c70%) of the subject lands have been identified as being at risk of flooding (Flood Zone A). In accordance with the sequential approach, it

Planning, T. Boylan)			<p>is recommended that the zoning of the subject lands should provide for water-compatible uses and avoid the provision of vulnerable and less vulnerable uses. (refer to Section 7.3 Flood Risk Management of this report for more detail).</p> <p>This would be in accordance with recommendations of 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (2009), in particular section 4.26, which advises that "... flood risk assessments required to support the development plan process may highlight existing, undeveloped areas which, on their own merits, were zoned for development in previous development plans but which new information indicates may now, or in the future, be at risk of flooding".</p> <p>Given the extent and location of Flood Risk Zone A on the lands in question, it is considered that removal of the existing residential zoning where the lands remain undeveloped is the most appropriate course of action, in line with the 'precautionary approach' of the Flood Risk Management Guidelines, which requires planning authorities to consider possible future changes in flood risk including the effects of climate change, "so that future occupants are not subject to unacceptable risks". In effect this means not giving the benefit of the doubt where risk has been identified.</p> <p>Recommendation Amend the zoning of the subject lands from Objective RES – 'To protect and/or improve residential amenity' in the Draft Plan to Objective OS 'to preserve and provide for open space and recreational amenities'.</p>
<p>37. Submission requests rezoning of lands at Andy Moore Park, Kiltipper Road, Oldbawn from OS to RES to make provision for a nursing home and care centre development on said lands. Submission notes that subject site comprises 0.8</p>	<p>Map 9</p>	<p>1.1 Ha. OS to RES</p>	<p>Chief Executive's Response and Recommendations As indicated in Tables 1.8, 1.9 and 1.10 of the Draft Plan, provision has been made for 1,188 Hectares of lands that are zoned for residential development within the County. These are sufficient to provide for the housing needs of the County up to circa 2025 (40,273 dwellings). This</p>

<p>Ha of the overall Dublin Postal Sports and Social Club (DPSSC) site, has frontage onto Kiltipper Road to the south, and is currently in use as a pitch & putt facility.</p> <p>Submission states that to maintain and improve existing facilities of DPSSC, it is proposed to sell part of the site which could be developed for a compatible land use. Submission states that the proposed facility would provide similar services as the nearby Kiltipper Wood Care Centre.</p> <p>Submission states that amendment sought would</p> <ul style="list-style-type: none"> - secure the future of the DPSSC as an amenity facility, - be compatible with established land uses in the area, - meet a demand for nursing home and care facility requirements in an area of aging population, - provide local employment, - provide a site proximate to existing local retail, non-retail and hospital services, - provide a site with access to existing services/infrastructure. <p>(DRAFTDEVPLAN0184, Vivienne Boylan, BMA Planning and Development Consultants, Dublin Postal Sports and Social Club)</p>			<p>includes for 152 hectares or 5,300 additional dwellings in the Metropolitan Consolidation Town of Tallaght. The zoning of the subject lands would therefore be surplus to the housing needs of Tallaght for the lifetime of the Draft Plan and beyond 2025.</p> <p>Further to the suggested use of the subject lands for a nursing home development, the Draft Plan seeks to provide for the housing needs of older people and to provide a range of accommodation choices within their own communities. The need to provide accommodation for older people has also been factored into the extent of lands that have been zoned for residential development within the County and the zoning of the subject lands would be surplus to requirement.</p> <p>The subject lands are located along a section of the Kiltipper Road that does not offer access to the necessary services, amenities and community facilities that are required for the integration of older people.</p> <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p>
<p>38. Submission seeks the zoning of 17.5 acres at Cornerpark to the north of Newcastle Village to RES –N and a further 3.5 acres to be zoned for a public park and playground.</p> <p>The submission outlines that the lands are partially zoned for residential development at present, are located in the centre of Newcastle</p>	<p>Map 3</p>	<p>1 Ha. RES-N & 7.2 Ha RU to RES-N</p>	<p>Chief Executive's Response and Recommendations</p> <p>See responses to Item 3 above and also Item 18 in relation to Newcastle's Role as a Small Town.</p> <p><u>Addition to Newcastle's Housing Capacity</u></p> <p>The Draft Plan already provides for a housing land capacity of 28 hectares or approx. 700 houses for Newcastle, which will cater for its housing needs up to 2025. A comprehensive Local Area Plan has been</p>

<p>village, zoning would comply with sequential approach and the lands are fully serviced. The development of the site would result in a modest expansion of Newcastle, would strengthen the central core, would incorporate new local park, provide a choice of location and house type for house holders, provide opportunities for retail and would not be affected by aircraft noise. (DRAFTDEVPLAN0357, Douglas Hyde)</p>			<p>prepared for these lands to ensure that are developed in an appropriate and phased manner that is linked to the provision of social and physical infrastructure, services and facilities.</p> <p>The proposed RES-N zoning of the subject lands would increase land capacity in Newcastle by approx. 26% to 35 hectares increasing housing capacity in Newcastle to approx. 875 additional dwellings.</p> <p>The zoning of the subject lands would therefore be completely surplus to the housing needs of Newcastle within the lifetime of the Draft Plan and beyond 2025 and are also not appropriate to housing development by reason of their location beyond the edge of a defined settlement and in an area not served by existing or planned social and physical infrastructure, services and facilities.</p> <p>The zoning of the subject lands would therefore be completely inconsistent with the Regional Planning Guidelines for the Greater Dublin Area and the Core Strategy for the County and would undermine both strategies. This would undermine the sustainable development of Newcastle, the realisation of its Local Area Plan and would be at variance with Planning and Development Legislation.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>39. Submission from landowner of lands adjacent to the Peyton housing estate in Rathcoole. The submission outlines that the lands are a superb location for residential development and requests consideration for zoning. The Stoney lane road is upgraded, the sewerage and water pipes are present and the site is no longer viable as farming land due to the constant trespassing of animals and people from the adjoining residential</p>	<p>Map 8</p>	<p>2.2 Ha. RU to RES</p>	<p>Chief Executive's Response and Recommendations See responses to Item 3,7,16 and 22 above in relation to Rathcoole's Housing Capacity.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>

development. (DRAFTDEVPLAN0385, Brendan, Seamus, Dermot & John Reilly)			
40. Submission requests the extension of the existing RES-N zoning of Kelland Homes lands at Kiltipper/ Killinarden southwards to join Kiltipper Road. Submission details that the zoning is logical extension and there are adequate services and amenities in the area to serve future housing on these lands. Submitted that the development could contribute to the upgrade of the Kiltipper Road. (DRAFTDEVPLAN0355, Tracy Armstrong, Fenton Associates, Kelland Homes Limited)	Map 9	7.6 Ha. RU to RES	<p>Chief Executive's Response and Recommendations See response to Item 3 above.</p> <p><u>Additional Housing Capacity and Elevated Location</u> The subject lands are located within the Rural Metropolitan Area of the County in an elevated area near the Dublin Mountain Zone and within the path of views that are designated on the Draft Plan 2016-2022 maps for preservation and protection.</p> <p>The subject lands are zoned to prevent a sprawl of development beyond the boundaries of the identified settlements defined under the Core Strategy and into rural and towards high amenity areas of the County.</p> <p>Further to the response to Items 3, provision has been made under the Draft Plan for 152 hectares or 5,300 additional dwellings in the Metropolitan Consolidation Town of Tallaght.</p> <p>The proposed RES-N zoning of the subject lands would increase land capacity adjacent to Tallaght would provide for an additional 200 additional dwellings. The zoning of the subject lands would therefore be surplus to the housing needs of Tallaght for the lifetime of the Draft Plan and beyond 2025. The subject lands are also not appropriate to housing development by reason of their location outside the edge of a defined settlement and in an area not served by existing or planned social and physical infrastructure, services and facilities.</p> <p>The zoning of the subject lands would therefore be inconsistent with the Regional Planning Guidelines for the Greater Dublin Area and the Core Strategy for the County and would undermine both strategies. This would undermine the sustainable development of Saggart -Citywest</p>

			<p>and would be at variance with Planning and Development Legislation.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>41. Request to rezone lands at Finnstown, between the Grand Canal and Dublin-Cork Railway Line (forming part of an overall landholding which includes lands to the south of the Canal), from RU to RES-N on the basis that the lands, if rezoned, could provide for development as under the Adamstown development strategy in respect of maximising use of commuter rail networks, and establishing retail and educational infrastructure. (DRAFTDEVPLAN0276, John F. O'Connor, JFOC Design & Planning, Henry & Ted Crowley)</p>	<p>Maps 1,3 & 4</p>	<p>114 Ha. RU to RES-N</p>	<p><u>Extent of Proposed Lands</u> Further to the response under Item 14 above, the subject lands are zoned to prevent a sprawl of development beyond the boundaries of the identified settlements including Lucan and Clondalkin and into rural areas of the County.</p> <p>The proposed RES-N zoning of the subject lands would increase the overall housing land capacity in the County by approx. 10% from 1,188 hectares to 1,300 hectares increasing housing capacity for 40,273 additional dwellings to approx. 44,000 additional dwellings. The Draft Plan already provides for approx. 18,100 dwellings in the adjacent Metropolitan Town of Lucan and Clondalkin (including 8,900 dwellings in Adamstown SDZ and 8,000 dwellings under Clonburris SDZs).</p> <p>The zoning of the subject lands would therefore be completely surplus to the housing needs of the County for the lifetime of the Draft Plan and beyond 2025 and are also not appropriate to housing development by reason of their location beyond the edge of a defined settlement and in an area not served by existing or planned social and physical infrastructure, services and facilities.</p> <p>The zoning of the subject lands would therefore be completely inconsistent with the Regional Planning Guidelines for the Greater Dublin Area and the Core Strategy for the County and would undermine both strategies. This would be at variance with Planning and Development Legislation.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be</p>

			amended.
<p>42. Submission requesting the zoning of a group of residential properties at Cooldrinagh Lane, Lucan to existing RES. Submitted that the residential use is established and having regard to the concentrated pattern of development, the realisation of the proposed 'RU' zoning objective is impossible.</p> <p>(DRAFTDEVPLAN0358, Jim Brogan, Jim Brogan, Mr Hugh Courtney)</p>	Map 1	2.8 Ha. RU to RES	<p>Chief Executive's Response and Recommendations</p> <p>The subject residential properties are located within the Rural Metropolitan Area of the County beyond the edge of the settlements defined under the Chapter 1 Core Strategy and settlement hierarchy.</p> <p>The subject lands are zoned to prevent an intensification of development beyond the boundaries of the identified settlements in rural areas of the County that are not served by existing or planned infrastructure, services and facilities.</p> <p>Residential development is listed as open for consideration under the RU zoning objective designated for the subject lands and the residential properties at Cooldrinagh Lane have been long established as low density residential developments. The zoning of the subject lands will continue to allow for appropriate extension of these residential properties in line with recent planning permissions for such development.</p> <p>The application of a RES zoning objective to the subject lands would establish the principle of the additional dwellings in this rural area. This would shift the emphasis of consolidation away from the identified growth settlements in the County including the Metropolitan Consolidation Towns of Lucan and Clondalkin. This would undermine the consolidation of such settlements including their existing social and physical infrastructure, services and facilities and would promote agglomerations in rural lands that are more difficult to serve by such infrastructure, services and facilities.</p> <p>The zoning of the subject lands would therefore be at variance with the Core Strategy and would undermine its settlement hierarchy including its consistency with the Regional Planning Guidelines for the Greater Dublin Area.</p>

			Recommendation It is not recommended that the Draft County Development Plan be amended.
43. Submission outlined objection to the zoning of a number of green areas adjacent to Tullyhall/Griffeen/Kishogue as suitable for housing. (DRAFTDEVPLAN0010, Jeanine Nolan)	Map 1,2, 4	26. 5 HA. Res, 37.2 Ha. RES-N 2.2 Ha. SDZ, 0.6 Ha. LC All to OS	Chief Executive's Response and Recommendations The undeveloped RES-N and SDZ zoned lands around Tullyhall/Griffeen/Kishogue have a long established zoning for residential development since the 1998 County Development Plan. An SDZ Planning Scheme and Local Area Plan was prepared for the area in 2008 and it is planned to review to scheme. The development of these lands will be required to provide amenity space and parks in accordance with the standards of the Plan and as delineated in the approved LAP/SDZ for the area. The subject lands are designated within the Metropolitan Consolidation Town of Clondalkin. The Settlement Strategy contained within the Regional Planning Guidelines (RPGs) identifies Metropolitan Consolidation Towns as settlement where population and housing growth should be directed, particularly to areas where there is access to high quality public transport. It is envisaged that these towns will continue to be developed as part of the consolidation of the Metropolitan Area, will continue to support key public transport corridors and will be important locations for services, retail and economic activity. This is reflected in the Core Strategy contained in the Draft County Development Plan, which seeks to ensure that zoned lands are located to gain maximum benefit from existing assets through consolidation and increasing densities within the existing built footprint of the Metropolitan Consolidation Towns. The removal of the proposed RES-N zoning objective from the lands would reduce the Draft Plan's Housing Land Capacity to a point that it would no longer be meet the housing needs of the County in accordance with the statutory requirements of the Regional Planning Guidelines and Planning and Development Legislation.

			Recommendation It is not recommended that the Draft County Development Plan be amended.
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Zoning - Regeneration (REGEN)

Submission	Map No.	Site Area/Zoning	Response/Recommendation
Regeneration (REGEN)			
<p>1. Request rezoning of the Fruitfield site adjacent to the Tallaght Arena development from partially 'REGEN' and partially 'EE' to entirely 'REGEN'. It is submitted that the Fruitfield site provides a significant opportunity for the regeneration of an area sequentially close the established town centre area, for a mix of uses which could facilitate inter alia enterprise, employment and residential development. The Development Plan provides an opportunity to harness these attributes by recognising the potential role of the subject lands to provide for regeneration of these land to further consolidate and reinforce the function of Tallaght</p> <p>(DRAFTDEVPLAN0083, Declan Brassil, Declan Brassil & Co., The Blenders, Newmarket Square)</p>	Map 9	<p>4.49 Ha.</p> <p>EE & REGEN to REGEN</p>	<p>Chief Executive's Response and Recommendation</p> <p>The subject issue is the proposal to zone lands at the junction of the N81 and Whitestown Way from Enterprise and Employment (EE) and Regeneration (REGEN) to full Regeneration (REGEN) zoning.</p> <p><u>REGEN zoning</u></p> <p>A Regeneration (REGEN) Zoning Objective has been introduced in the Draft Plan 2016-2022 and applied principally to lands adjoining Tallaght Town Centre and Walkinstown. The aim of this zoning objective is to support and facilitate the regeneration of underutilised industrial lands that are proximate to town centres and transport nodes to provide for a more intensive mix of enterprise and/or residential led development. These areas are predominantly characterised by high levels of vacancy, poor environmental quality and fragmented land ownerships, but are serviced and offer significant potential by reason of location for more intensive forms of enterprise and/or residential led development.</p> <p>It is a requirement under the Planning and Development Act 2000 (as amended) for the County Development Plan, including its Core Strategy, to be consistent with the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 and to ensure that sufficient and suitable lands are zoned to meet the population and housing requirements for the County. The Core Strategy in Chapter 1 of the Draft Plan identifies a growth in population of over 26,300 people and a need for over 32,000 dwellings during the lifetimes of the County Development Plan and it is a requirement to ensure that enough lands are zoned for such need and in appropriate places. The REGEN zone has the flexibility to accommodate residential led development, subject to compliance with the Draft Plan standards.</p>

			<p>The Economic Strategy of the Draft Plan seeks to ensure that there is a sufficient supply of zoned and serviced lands at suitable locations to accommodate future demand for enterprise and employment investment across a diverse range of sectors. The strategy also seeks to strengthen the alignment between employment, population and transport services. Whilst a range of employment uses are permitted in principle or open for consideration across a range of land-use zonings, the County Development Plan seeks to guide enterprise and employment development to appropriate locations by identifying economic clusters, appropriately zoned lands, and setting out policies and objectives for the future development of these areas.</p> <p>It is noted that the subject site is subject to both EE and REGEN zoning, and is adjoined by the 'Tallaght Arena' development to the east which is subject to REGEN zoning. The subject site is also located proximity to the Luas and Tallaght Town Centre/TC zoned lands, and is served by adequate road access. As such, the subject site would be appropriate for enterprise and/or residential led development. The modification to ET Policy 1 Objective 6 with regard to people intensive enterprise and employment uses, and the walking distances to same (detailed in Section 4 of this report) is also noted in this regard.</p> <p>Having regard to the context and characteristics of the subject lands, existing zoning objectives, and limited scale of the subject lands, it is considered that the lands would be compatible with the primary objective of REGEN zoning 'to facilitate enterprise and/or residential led regeneration'. The zoning of the subject lands for REGEN to support enterprise and/or employment led regeneration development is therefore considered appropriate in this instance.</p> <p>Recommendation</p> <p>Amend the zoning of the subject lands from Objective EE in the Draft Plan to Objective REGEN 'to facilitate enterprise and/or residential led regeneration'.</p>
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<p>2. Submission requesting the land marked Adamstown South of the railway line and north of the Grand Canal adjacent to the Newcastle / Lock Road would be most beneficial with a 'REGEN' zoning category, for light industry. The submission outlines the need to create local jobs, to address shortage of offices for small to medium enterprises in Lucan, to reduce the traffic impact, to maximise the proximity of Grange Castle and that a landscaped 'REGEN' area would complement Griffeen Park and increases the use of the cycle network. (DRAFTDEVPLAN0128, Denis Twohig, Westbury Court Residents Association)</p>	<p>Map 1/4</p>	<p>16.7 Ha. RES-N to REGEN</p>	<p>Chief Executive's Response and Recommendations The subject issue is the proposal to zone lands to the north of the Grand Canal and adjacent to the Newcastle/Lock Road from Residential new (RES-N) to Regeneration (REGEN).</p> <p><u>Core Strategy Requirements</u> It is a requirement under the Planning and Development Act 2000 (as amended) for the County Development Plan, including its Core Strategy, to be consistent with the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 and to ensure that sufficient and suitable lands are zoned to meet the population and housing requirements for the County. The Core Strategy in Chapter 1 of the Draft Plan identifies a growth in population of over 26,300 people and a need for over 32,000 dwellings during the lifetimes of the County Development Plan and it is a requirement to ensure that enough lands are zoned for such need and in appropriate places.</p> <p>The subject lands, zoned RES-N, are designated within the Metropolitan Consolidation Town of Clondalkin. The Settlement Strategy contained within the Regional Planning Guidelines (RPGs) identifies Metropolitan Consolidation Towns as settlement where population and housing growth should be directed, particularly to areas where there is access to high quality public transport. It is envisaged that these towns will continue to be developed as part of the consolidation of the Metropolitan Area, will continue to support key public transport corridors and will be important locations for services, retail and economic activity.</p> <p>This is reflected in the Core Strategy contained in the Draft County Development Plan, which seeks to ensure that zoned lands are located to gain maximum benefit from existing assets through consolidation and increasing densities within the existing built footprint of the Metropolitan Consolidation Towns. The removal of the proposed RES-N zoning objective from the lands would reduce the Draft Plan's Housing Land Capacity to a point that it would no longer be meet the housing needs of</p>
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			<p>the County in accordance with the statutory requirements of the Regional Planning Guidelines and Planning and Development Legislation.</p> <p><u>REGEN zoning</u> With regard to the principle objective of the REGEN zone, the response to Item 1 above is noted. In addition, having regard to the context and characteristics of the subject lands, comprising a greenfield site, it is considered that the lands would be incompatible with the primary objective of the Regeneration zoning. In this regard, rezoning of the subject lands from RES-N to REGEN would not be suitable or appropriate in this instance.</p> <p><u>Permitted Uses</u> With regard to the uses referred to in the submission received, it is noted that the proposed RES-N zoning objective allows for a multitude of commercial and enterprise uses on the subject lands, including Industry-Light, and Offices less than 100sq.m as permitted in principle uses, and Industry-General, Live-Work Units, Office-Based Industry, Offices 100sq.m-1,000sq.m, and Science and Technology Based Enterprise as open for consideration uses. In addition, Open Space and recreational/community uses are also permitted in principle under the RES-N zoning objective.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
3. Requests the rezoning of a 2.14 ha area of land located on the northern side of the Naas Road from 'EE' in the Draft Plan to 'REGEN'. The site currently comprises several warehouses and is bounded by Joels Restaurant. The submission outlines that the 'EE' zoning objective conflicts with the Naas Road Framework Plan and the	Map 5	2.17 Ha. EE to REGEN	<p>Chief Executive's Response and Recommendations The subject issue is the proposal to zone lands on the Naas Road from Enterprise and Employment (EE) to Regeneration (REGEN).</p> <p><u>REGEN zoning</u> With regard to the principle objective of the REGEN zone, the response to Item 1 above is noted.</p>

<p>REGEN would be more suitable for the following reasons:</p> <ul style="list-style-type: none"> -Inappropriate to allow the current policy conflict to be maintained in the new Development Plan; -Underutilised brownfield land proximate to public transport and local amenities; -Opportunity for comprehensive mixed use redevelopment; -Enterprise and Employment Uses would be an inefficient use of land at this location for which there is no market demand; and -Facilitate development in line with the Planning Authority's vision for the area as outlined in Naas Road Development Framework 2009. <p>(DRAFTDEVPLAN0117, Suzanne McClure, Brock McClure Consultants, Arcourt Ltd.)</p>		<p>In addition, it is noted that whilst a range of employment uses are permitted in principle or open for consideration across a range of land-use zonings, the County Development Plan seeks to guide enterprise and employment development to appropriate locations by identifying economic clusters, specific EE zoned lands and setting out policies and objectives for the future development of these areas.</p> <p>The subject site is located within an established industrial setting and it is considered that the existing EE zoned site forms part of the Economic Strategy of the Draft Plan. As such, having regard to the context and characteristics of the subject lands, it is considered that the lands would be incompatible with the primary objective of REGEN zoning 'to facilitate enterprise and/or residential-led regeneration'. It is also noted that the REGEN land use zoning is strategic in nature, and the application of the REGEN zoning in an incremental piecemeal fashion is not recommended as it undermines the Core Strategy of the Draft Plan and intention of the REGEN zoning. The zoning of the subject lands for EE to support enterprise and employment is therefore considered appropriate in this instance.</p> <p><u>Naas Road Development Framework Plan</u></p> <p>The contents of the submission with regard to the Naas Road Development Framework Plan is noted. The lands along and adjacent to the Naas Road (inside the M50) are subject to proposed zoning objectives EE and REGEN, and a proposed LAP under CS6 SLO1 of the Draft Plan 2016-2022. The lands that are covered under CS6 SLO 1 and the proposed LAP extension lands are included the area of the Naas Road Development Framework Plan (2010). The proposed zoning objectives along and around the Naas Road allow for adequate flexibility for development in line with the provisions of the proposed LAP under CS6 SLO1. The preparation of this LAP (subject to any proposed amendments, as detailed in Section 1.9.0 of Chapter 1 above) will have regard to the Naas Road Development Framework Plan and may incorporate the movement framework principles of same. Section 1.9.0 of this report is also noted in this regard.</p>
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			Recommendation It is not recommended that the Draft County Development Plan be amended.
4. Submission requests the rezoning of a c1ha section of land at Coldcut Road, Dublin 22. The site is opposite the entrance to Liffey Valley Shopping centre, is currently zoned 'OS' and accommodates a 3 storey leisure centre and surface car parking. The submission requests rezoning to 'REGEN', having regard to the following: - Underutilised brownfield land proximate to Liffey Valley Town Centre. - Opportunity for commercial and employment generating uses not related to retail. - Promote compact urban development proximate to QBC - Complementary uses would not undermine retail core - Provide broad range of employment opportunities in area of socioeconomic disadvantage - Not an environmentally sensitive area (DRAFTDEVPLAN0115, Suzanne McClure, Brock McClure Consultants, Vinjac Ltd.)	Map 2	0.44 Ha. OS to REGEN	Chief Executive's Response and Recommendations The subject issue is the proposal to zone lands on the Naas Road from Enterprise and Employment (EE) to Regeneration (REGEN). <u>REGEN zoning</u> With regard to the principle objective of the REGEN zone, the response to Item 1 above is noted. In addition, it is noted that the subject lands form part of an established area of open space lands and are not part of or proximate to underutilised industrial lands suitable for regeneration. As such, having regard to the context and characteristics of the subject lands, it is considered that the lands would be incompatible with the primary objective of REGEN zoning 'to facilitate enterprise and/or residential-led regeneration'. It is also noted that the REGEN land use zoning is strategic in nature, and the application of the REGEN zoning in an incremental piecemeal fashion is not recommended as it undermines the Core Strategy of the Draft Plan and intention of the REGEN zoning. In this regard, rezoning of the subject lands from OS to REGEN would not be suitable or appropriate in this instance. <u>Permitted Uses</u> It is noted that the existing leisure centre use is compatible with the OS zoning objective of the subject lands, under which 'Community Centre', 'Recreational Facility', and 'Sports Club/Facility' are permitted in principle in addition to 'Allotments' and 'Open Space' uses. Recommendation It is not recommended that the Draft County Development Plan be

			amended.
<p>5. Request to rezone approx 325 hectares of lands (Naas Road Development Framework Lands) to the east of the M50 and south of the Grand Canal from Zoning Objective 'EE' (enterprise and employment) to Zoning Objective 'REGEN' (Regeneration) by reason of:</p> <ul style="list-style-type: none"> - The opportunity to realise the redevelopment of strategic brownfield lands and facilitate high density mixed use development on lands proximate to public transport and local amenities; - the inappropriateness of the proposed 'EE' zoning objective, which excludes retail and residential uses and conflicts with and fails to realise the Naas Road Development Framework Plan (NRDFP); - the need for a Development Plan mechanism to reflect the objectives of the NRDFP including proposals to facilitate a gradual change from light industry to mixed uses; - the need for a more progressive zoning that will address the recent location of businesses to places outside the area; - the need to address the undersupply of houses in appropriate locations in Dublin and modest population growth in South Dublin; - The effect of CS6 SLO 1, which would redirect regeneration away from the area of NRDFP and supersede the plan. <p>(DRAFTDEVPLAN0163, Suzanne McClure, Brock McClure Consultants, Ben Partnership)</p>	Map 5	<p>291 Ha.</p> <p>EE to REGEN</p>	<p>Chief Executive's Response and Recommendations</p> <p>The subject issue is the proposal to zone lands on the Naas Road from Enterprise and Employment (EE) to Regeneration (REGEN). It is noted that the submission refers to all lands subject to EE zoning to the east of the M50, as identified on Draft Plan 2016-2022 Map 5.</p> <p><u>REGEN zoning</u></p> <p>With regard to the principle objective of the REGEN zone, the response to Item 1 above is noted.</p> <p>In addition, it is noted that whilst a range of employment uses are permitted in principle or open for consideration across a range of land-use zonings, the County Development Plan seeks to guide enterprise and employment development to appropriate locations by identifying economic clusters, specific EE zoned lands and setting out policies and objectives for the future development of these areas.</p> <p>The REGEN zoning has the flexibility to accommodate residential led development subject to compliance with the Draft Plan standards. In this regard, it is noted that the areas includes 3 Seveso sites. These sites and their surrounding lands are subject to restrictions in terms of the scope of acceptable land uses and density of development, as detailed in Section 11.6.4 of the Draft Plan. IE Policy 6 states that is the policy of the Council to have regard to the provisions of the Major Accidents Directive (European Council Directive 2012/18/EU) and the technical advice of the Health and Safety Authority (HSA) in relation to identified SEVESO sites in the County, and includes an Action stating that in preparing spatial plans and assessing development proposals, the Planning Authority will consult with and have regard to the technical advice of the Health and Safety Authority (HSA) in relation to proposed land uses in proximity to SEVESO sites, and will assess land use compatibility using the Individual Risk Matrix and the Inner, Middle and</p>

		<p>Outer Land Use Planning Zones around SEVESO sites as prescribed by the HSA.</p> <p>The development potential of the subject lands for residential use is tempered by the parameters of the Seveso Zones across the subject lands. As such, rezoning of the subject lands from EE to REGEN would not be suitable or appropriate in this instance.</p> <p>Furthermore, the flood risk mapping identifies section of the subject lands as being in flood risk zone A and flood risk zone B. Residential development is identified as a highly vulnerable class of development under 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (2009) while employment development is identified as being less vulnerable. The zoning of the subject lands for REGEN which has the flexibility to accommodate residential led development subject to compliance with the Draft Plan standards, as noted above, would therefore also be contrary to the recommendations of 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (2009) (see Section 7.3. of this report for further detail on Flood Risk).</p> <p>The subject site is located within an established industrial setting and it is considered that the existing EE zoned site forms part of the Economic Strategy of the Draft Plan. As such, having regard to the context, flood risk and characteristics of the subject lands, it is considered that the lands would be incompatible with a comprehensive redevelopment and the primary objective of REGEN zoning 'to facilitate enterprise and/or residential-led regeneration'. It is also noted that the REGEN land use zoning is strategic in nature, and the application of the REGEN zoning in a haphazard incremental fashion is not recommended as it undermines the Core Strategy of the Draft Plan and intention of the REGEN zoning. The zoning of the subject lands for EE to support enterprise and employment is therefore considered appropriate in this instance.</p>
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<p>6. Requests rezoning of lands zoned EP2 at Killeen Road, Dublin 12 to REGEN. The submission lands (c.9ha) lie within an established industrial area that has potential for a greater intensity of employment led mixed use development, having regard to:</p> <ul style="list-style-type: none"> - The location of the lands within 10km of Dublin City Centre, and proximate to other urban centres within the South Dublin County administrative area. - The availability of public services (water, drainage, etc.) - Excellent access to the national road network and public transport (rail, luas & bus). - The wide range of established employment uses, including business park and retail 	Map 5	<p>9.05 Ha.</p> <p>EE to REGEN</p>	<p>Chief Executive's Response and Recommendations The subject issue is the proposal to zone lands on Killeen Road from Enterprise and Employment (EE) to Regeneration (REGEN).</p> <p><u>REGEN zoning</u> With regard to the principle objective of the REGEN zone, the response to Item 1 above is noted.</p> <p>In addition, it is noted that whilst a range of employment uses are permitted in principle or open for consideration across a range of land-use zonings, the County Development Plan seeks to guide enterprise and employment development to appropriate locations by identifying economic clusters, specific EE zoned lands and setting out policies and objectives for the future development of these areas.</p> <p>The subject site is located within an established industrial setting and it</p>

<p>warehousing, at this location.</p> <p>- Opportunities for co-ordinated redevelopment of large neighbouring plots, where necessary as part of a Local Area Plan (see Draft Plan Core Strategy Objective CS6 Objective 1 and CS6 SLO1).</p> <p>(DRAFTDEVPLAN0161, Eleanor Mac Partlin, Stephen Little & Associates, Killeen Motor Group)</p>			<p>is considered that the existing EE zoned site forms part of the Economic Strategy of the Draft Plan. As such, having regard to the context and characteristics of the subject lands, it is considered that the lands would be incompatible with the primary objective of REGEN zoning 'to facilitate enterprise and/or residential-led regeneration'. It is also noted that the REGEN land use zoning is strategic in nature, and the application of the REGEN zoning in an incremental piecemeal fashion is not recommended as it undermines the Core Strategy of the Draft Plan and intention of the REGEN zoning. The zoning of the subject lands for EE to support enterprise and employment is therefore considered appropriate in this instance.</p> <p><u>Flood risk</u></p> <p>The SDCC SFRA and Eastern CFRAM study draft mapping identify a portion of the subject lands as being in flood risk zone A and zone B. The response to Item 5 above is noted in this regard.</p> <p><u>Local Area Plans (LAPs)</u></p> <p>CS Policy 6 provides specifically for the preparation of Local Area Plans (LAPs), as appropriate, and to prioritise areas likely to experience large scale residential or commercial development or regeneration. The contents of the submission regarding CS6 Objective 1 and CS6 SLO1 are noted. The response in Section 1.9.0 of this report regarding the Walkinstown-Greenhills LAP under CS6 SLO1 is also noted in this regard.</p> <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p>
<p>7. Submission requests the rezoning of a c15 acre site on the southern site of the Long Mile road from 'EE' to 'REGEN'. The submission outlines that the wide range of uses that were either 'Permitted in Principle' or 'Open for consideration'</p>	<p>Map 5</p>	<p>6.3 Ha.</p> <p>EE to REGEN</p>	<p>Chief Executive's Response and Recommendations</p> <p>The subject issue is the proposal to zone lands on the southern side of the Long Mile Road from Enterprise and Employment (EE) to Regeneration (REGEN).</p>

<p>in 'EP1' zoned lands showed that South Dublin County Council had a vision for the area, and while it may have been a long term vision, it provided a road map that local landowners could follow if they intended to redevelop their lands in the future. When compared to the current 'EP1' use class a number of significant changes are proposed for the new 'EE' zone and as a result will significantly and negatively impact upon and restrict the development potential of the lands (DRAFTDEVPLAN0264, Joe Bonner, Joe Bonner Planning, J. Harris Assemblers)</p>			<p><u>REGEN zoning</u> With regard to the principle objective of the REGEN zone, the response to Item 1 above is noted.</p> <p>In addition, it is noted that whilst a range of employment uses are permitted in principle or open for consideration across a range of land-use zonings, the County Development Plan seeks to guide enterprise and employment development to appropriate locations by identifying economic clusters, specific EE zoned lands and setting out policies and objectives for the future development of these areas. The subject site is located within an established industrial setting and it is considered that the existing EE zoned site forms part of the Economic Strategy of the Draft Plan. As such, having regard to the context and characteristics of the subject lands, it is considered that the zoning of the subject lands for EE to support enterprise and employment is therefore considered appropriate in this instance.</p> <p>Furthermore, while it is noted that the subject lands abut REGEN zoned lands to the southeast, these REGEN lands are located adjacent to existing established residential areas, and represent a logical extension/infill development to the inner suburban area of Walkinstown, located with the Metropolitan Consolidation Areas. The REGEN land use zoning is strategic in nature, and the application of the REGEN zoning in an incremental piecemeal fashion is not recommended as it undermines the Core Strategy of the Draft Plan and intention of the REGEN zoning. The zoning of the subject lands for EE to support enterprise and employment is therefore considered appropriate in this instance.</p> <p><u>Permitted Uses</u> The submission received refers to the potentially restricting nature of the EE zoning objective of the subject lands under the Draft Plan relative to the EP1 zoning under the current Plan. In this regard, it is noted that uses considered 'permitted in principle' under EP1 are 'permitted in principle' or 'open for consideration' under the EE zoning</p>
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			<p>objective, save for Health Centre and Residential use in accordance with a Local Area Plan.</p> <p>While a number of uses 'open for consideration' under EP1 are 'not permitted' under EE zoning, it is noted that these uses (including Community Centre, Cultural Use, Doctor/Dentist, Place of Worship, Recreational Facility, Primary Health Care Centre) and Health Centre use comprise community facilities and services which should be located/directed into both established and developing residential areas to serve the population of same.</p> <p>With regard to retail, it is noted that while 'Shop-Neighbourhood' was 'open for consideration' under EP1 zoning, it is 'not permitted under EE zoning; however, 'Shop-Local' is 'permitted in principle under EE as under EP1. In this regard, it is noted that 'Shop-Local' is defined under Schedule 5 of the Draft Plan as a local shop of not more than 100sq.m. that primarily serves a 'walk-in' population and does not generally attract business from outside the local area. It is considered that this use class would adequately serve employees in employment and enterprise developments on EE zoned lands.</p> <p>It is also noted that the application of a zoning objective on a site/s does not preclude the existing use of a particular site or property. The wording of Section 11.1.1 of the Draft Plan with regard to Other Uses and Non Conforming Uses is also noted in this regard.</p> <p>The land use matrix regarding zoning objective EE is considered adequate and appropriate with regard to enterprise and employment lands.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
8. Submission relates to five sites located at and	Map 5	21 Ha.	Chief Executive's Response and Recommendations

<p>adjacent to the Naas Road and Long Mile Road junction. Submission requests that the subject lands be rezoned from proposed objective EE to proposed zoning objective REGEN on the basis that it would provide the optimum zoning of such lands with regard to accessibility level to public transport, suitable and sustainable development opportunities (including mixed-use development), the provision of a logical extension to proposed REGEN lands adjacent to the subject sites, and potential to deliver regionally important and Core Strategy objectives.</p> <p>(DRAFTDEVPLAN0081, Declan Brassil, Declan Brassil & Co., Harris Group of Naas Road)</p>		<p>EE to REGEN</p>	<p>The subject issue is the proposal to zone lands adjacent to the junction of the Naas Road and Long Mile Road from Enterprise and Employment (EE) to Regeneration (REGEN). It is noted that the subject lands comprise five physically separate sites, collectively comprising c.21 Ha.</p> <p><u>REGEN zoning</u></p> <p>With regard to the principle objective of the REGEN zone, the response to Item 1 above is noted.</p> <p>In addition, it is noted that whilst a range of employment uses are permitted in principle or open for consideration across a range of land-use zonings, the County Development Plan seeks to guide enterprise and employment development to appropriate locations by identifying economic clusters, specific EE zoned lands and setting out policies and objectives for the future development of these areas.</p> <p>The subject site is located within an established industrial setting and it is considered that the existing EE zoned site forms part of the Economic Strategy of the Draft Plan. Notwithstanding the context of the site, including direct road access, it is considered that the lands would be incompatible with the primary objective of REGEN zoning 'to facilitate enterprise and/or residential-led regeneration' in this instance. It is also noted that the REGEN land use zoning is strategic in nature, and the application of the REGEN zoning in an incremental piecemeal fashion is not recommended as it undermines the Core Strategy of the Draft Plan and intention of the REGEN zoning. The zoning of the subject lands for EE to support enterprise and employment is therefore considered appropriate in this instance.</p> <p>Furthermore, the REGEN has the flexibility to accommodate residential led development subject to compliance with the Draft Plan standards. In this regard, it is noted that part of the subject lands, comprising a site to the immediate north of the Naas Road/Long Mile Road junction falls within a Seveso Zone. The response to Item 5 above is noted in this</p>
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			<p>regard. Having regard to same, the development potential of the subject lands for residential use is tempered by the parameters of the Seveso Zones across the subject lands, and as such, rezoning of the subject lands from EE to REGEN would not be suitable or appropriate in this instance.</p> <p><u>Flood risk</u> The SDCC SFRA and Eastern CFRAM study draft mapping identify a portion of the subject lands as being in flood risk zone A and zone B. The response to Item 5 above is noted in this regard.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>9. Submission requests rezoning of eastern portion of lands at Tara Co-op site from proposed zoning objective HA-LV [zoned I under existing Plan] to proposed zoning objective REGEN, with the remaining lands remaining as proposed zoning objective HA-LV.</p> <p>Submission notes that the eastern section of the subject lands currently comprise of warehouse units with an established use for commercial business since pre-1963, and that said buildings are in need of modernisation due to their original association with use as an Agricultural Co-Op. Submission also notes that the subject lands are subject to a Specific Local Objective under the current Plan: 'LZO1. Cooldrinagh - Redevelopment of Former CoOp Site Facilitate the redevelopment of the portion of lands occupied by the former Tara Co-Op buildings with a replacement development of</p>	Map 1	<p>2.5 Ha</p> <p>HA-LV to REGEN</p>	<p>Chief Executive's Response and Recommendations The subject issue is the proposal to zone a portion of overall lands to the immediate south of the Leixlip Road from High Amenity Liffey Valley (HA-LV) to Regeneration (REGEN).</p> <p><u>REGEN zoning</u> With regard to the principle objective of the REGEN zone, the response to Item 1 above is noted.</p> <p>In addition, it is noted that the subject lands form part of an established area of open space lands and are not part of or proximate to underutilised industrial lands suitable for regeneration. As such, notwithstanding an existing warehouse use on site, having regard to the context and characteristics of the subject lands, it is considered that the lands would be incompatible with the primary objective of REGEN zoning 'to facilitate enterprise and/or residential-led regeneration'. It is also noted that the REGEN land use zoning is strategic in nature, and the application of the REGEN zoning in an incremental piecemeal fashion, including to match the established use on small plots of land, is</p>

<p>a scale, design and layout appropriate to its prominent location in a Green Belt Zone and in proximity to the Liffey Valley High Amenity Area, the M4 and the Lucan/ Leixlip urban areas. Any such development should not compromise the important geomorphic and archaeological heritage of the site, and adjacent sites. Additionally it should not compromise the vistas or landscape amenity or biodiversity of the Valley'.</p> <p>This LZO is not included in the Draft Plan.</p> <p>Submission states that the eastern section of the subject lands presents a suitable site for enterprise-led regeneration, particularly having regard to the provisions of LZO1 under the current Plan.</p> <p>(DRAFTDEVPLAN0495, Peter Cafferkey, Owners of the former Tara Co - op lands)</p>			<p>not recommended as it undermines the Core Strategy of the Draft Plan and intention of the REGEN zoning. In this regard, rezoning of the subject lands from HA-LV to REGEN would not be suitable or appropriate in this instance.</p> <p><u>Permitted uses</u></p> <p>It is noted that the application of a zoning objective on a site/s does not preclude the existing use of a particular site or property. A number of uses are also open for consideration under the HA-LV, including Agriculture, Allotments, and Education; Bed & Breakfast, Childcare Facilities, Community Centre, Doctor/ Dentist, Guest House, Home Based Economic Activities, Hotel/ Hostel, Public House, Restaurant/Café, Rural Industry-Food, and Shop-Local in existing premises; Boarding Kennels, Cemetery, Cultural Use, Place of Worship, and Traveller Accommodation providing for a 30m setback from the river bank; a Car Park for small-scale amenity/recreational purposes only and providing for a 30m setback from the river bank; Public Services subject to acceptable landscape impact assessment; and Residential in existing premises and in accordance with Council policy for residential development in rural areas.</p> <p>The wording of Section 11.1.1 of the Draft Plan with regard to Other Uses and Non Conforming Uses is also noted in this regard.</p> <p><u>Local Zoning Objectives</u></p> <p>The contents of the submission in relation to the LZO pertaining to the subject site under the current Plan are noted.</p> <p><u>Impact on Liffey Valley</u></p> <p>The subject lands are zoned HA-LV - to Protect and enhance the outstanding natural character and amenity of the Liffey Valley. The protection and enhancement of these landscapes and associated natural and built heritage features is a priority of the Development Plan. This is reflected under HCL Policy 10 of the Draft Plan and its associated objectives, which provide for the protection and</p>
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			<p>enhancement of the Liffey Valley. The proposed REGEN zoning would be incompatible with the policies and objectives of the County to restrict development within the Liffey Valley and protect its visual, recreational, environmental, ecological and geological amenity value.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>10. Objection to proposed rezoning of lands on Greenhills Road, Walkinstown (subject site comprising c.1.9 Ha in area, former BWG lands) from existing zoning objective EP1 to proposed zoning objective REGEN, also subject to future LAP proposed under CS6 SLO1.</p> <p>Submission notes objection on the basis that:</p> <ul style="list-style-type: none"> - having regard to the enterprise and industrial nature of the area, the Greenhills Road lands are not a suitable location for possible residential-led development, and such development could have a negative and detrimental impact on existing and future employment levels and opportunities in South Dublin. - while the Greenhills area is in need of regeneration, this should be more commercially orientated rather than residential focused; residential based uses should be 'open for 'consideration' rather than 'permitted in principle' under the 'Regen' zoning objective. - the requirement for the Council to prepare a masterplan or Local Area Plan for the entire Greenhills area, and to also potentially place a restrictive phasing program for the lands, will effectively sterilise the future development of the 	Map 5	<p>2.04 Ha.</p> <p>EP1 to REGEN</p>	<p>Chief Executive's Response and Recommendations The subject issue is an objection to rezone of lands on the Greenhills Road from EP1 under the current Plan to Regeneration (REGEN).</p> <p><u>REGEN zoning</u> With regard to the principle objective of the REGEN zone, the response to Item 1 above is noted.</p> <p>In addition, it is noted that the subject lands form part of overall lands subject to REGEN zoning located adjacent to existing established residential areas, and represent a logical extension/infill development to the inner suburban area of Walkinstown, located with the Metropolitan Consolidation Areas. Having regard to the context and characteristics of the subject lands, it is considered that the lands would be compatible with the primary objective of REGEN zoning 'to facilitate enterprise and/or residential led regeneration'. The zoning of the subject lands for REGEN to support enterprise and/or employment led regeneration development is therefore considered appropriate in this instance.</p> <p>Furthermore, as detailed in Section 4 of this report, it is considered that there are significant lands subject to EE zoning to cater for enterprise and employment uses. The zoning of additional EE lands is not, therefore, warranted at this time. It is also noted that land use zoning is strategic in nature and incremental retrofitting of zoning objectives to match the established/intended use on small plots of land is not recommended as it undermines the core strategy of the Plan.</p>

<p>subject lands until such a time that the LAP has been adopted, which is envisaged to be in 2018.</p> <p>Submission requests that in the absence of amendments to the zoning of the subject lands and/or provisions of CS6 SLO1, as requested, that a specific local objective be applied to the subject lands to enable the appropriate development of same and enable the commencement of the Greenhills Road upgrade as identified in Table 6.5 of the Draft Plan. (DRAFTDEVPLAN0258, Donal Duffy, Downey Planning, Drumargh Ltd)</p>			<p><u>Local Area Plans (LAPs)</u> The contents of the submission regarding CS6 Objective 1 and CS6 SLO1 are noted. The response in Section 1.9.0 of this report regarding the Walkinstown-Greenhills LAP under CS6 SLO1 is also noted in this regard.</p> <p><u>Specific Local Objective (SLO)</u> The provision of an additional/alternative SLO with regard to the subject lands in the absence of a change to the zoning objective of the subject lands, as referenced in a submission received, would essentially bypass policy and criteria contained in County Development Plan that sets out to ensure that development is assessed from first principles and occurs in appropriate areas of the County. The provision of an SLO for the subject lands is not, therefore, recommended.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
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Zoning - Employment (EE)

Submission	Map No.	Site Area/Zoning	Response/Recommendation
Employment (EE)			
<p>1. Proposes that the zoning of land marked Adamstown south of the railway line and north of the Grand Canal adjacent to the Newcastle/Lock Road be for Enterprise and Employment (EE) instead of residential development by reason of the need to create local jobs, address shortage of offices for small to medium enterprises in Lucan, reduced traffic impact, proximity of Grange Castle, EE landscaped area complements Griffeen Park and increases the use of the cycle network.</p> <p>Failing the above, the submission proposes that the land be used to build these badly needed amenity services for the Lucan area such as a swimming pool, scouts dens, basketball courts, boxing arenas, new pitches and/or other similar amenities.</p> <p>(DRAFTDEVPLAN0070, Jim Copeland, Jim CopelandDRAFTDEVPLAN0204, John McGivney, Finnstown Abbey / Priory / Cloisters Residents Associations DRAFTDEVPLAN0235, Sandra Lee, Canonbrook Residents Association)</p>	Map 1/4	16.78 Ha. RES-N to EE	<p>Chief Executive's Response and Recommendation</p> <p>The subject issue is the proposal to zone lands to the north of the Grand Canal and adjacent to the Newcastle/Lock Road from Rural (RU) to Enterprise and Employment (EE).</p> <p><u>Core Strategy Requirements</u></p> <p>It is a requirement under the Planning and Development Act 2000 (as amended) for the County Development Plan, including its Core Strategy, to be consistent with the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 and to ensure that sufficient and suitable lands are zoned to meet the population and housing requirements for the County. The Core Strategy in Chapter 1 of the Draft Plan identifies a growth in population of over 26,300 people and a need for over 32,000 dwellings during the lifetimes of the County Development Plan and it is a requirement to ensure that enough lands are zoned for such need and in appropriate places.</p> <p>The subject lands, zoned RES-N, are designated within the Metropolitan Consolidation Town of Clondalkin. The Settlement Strategy contained within the Regional Planning Guidelines (RPGs) identifies Metropolitan Consolidation Towns as settlement where population and housing growth should be directed, particularly to areas where there is access to high quality public transport. It is envisaged that these towns will continue to be developed as part of the consolidation of the Metropolitan Area, will continue to support key public transport corridors and will be important locations for services, retail and economic activity.</p>

			<p>This is reflected in the Core Strategy contained in the Draft County Development Plan, which seeks to ensure that zoned lands are located to gain maximum benefit from existing assets through consolidation and increasing densities within the existing built footprint of the Metropolitan Consolidation Towns. The removal of the proposed RES-N zoning objective from the lands would reduce the Draft Plan's Housing Land Capacity to a point that it would no longer be meet the housing needs of the County in accordance with the statutory requirements of the Regional Planning Guidelines and Planning and Development Legislation.</p> <p><u>Quantum of enterprise and employment lands</u></p> <p>With regard to the proposed to rezone the subject lands EE, it is noted that the Economic Strategy for South Dublin County seeks to ensure that there is a sufficient supply of zoned and serviced lands at suitable locations to accommodate future demand for enterprise and employment investment across a diverse range of sectors. The strategy also seeks to strengthen the alignment between employment, population and transport services. Whilst a range of employment uses are permitted in principle or open for consideration across a range of land-use zonings, the County Development Plan seeks to guide enterprise and employment development to appropriate locations by identifying economic clusters and setting out policies and objectives for the future development of these areas.</p> <p>Having regard to the employment profile and sectoral breakdown of the County relative to EE and REGEN zoned lands, detailed in Section 4.3.0 of this report, it is considered that the quantum of lands zoned for enterprise and employment uses are reasonable and appropriate to meet the employment needs for the County at this time. It is also noted that vacancy in established industrial areas and estates may accommodate EE-related uses. In this regard, it is considered that Grangecastle, Clonburris and</p>
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			<p>Adamstown have the scope to accommodate adequate enterprise and employment uses in proximity to the subject lands. The zoning of additional EE lands is not, therefore, warranted at this time.</p> <p><u>Permitted Uses</u> With regard to permitted uses, it is noted that the proposed RES-N zoning objective allows for a multitude of commercial and leisure/recreational uses on the subject lands including the provision of a swimming pool.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>2. Submission requests change of zoning from 'RURAL' zone to 'EE' to match existing zoning of Greenogue Business Park. The subject lands are located north of the existing industrial estate adjacent to Baldonell Aerodrome. Submission outlines:</p> <ul style="list-style-type: none"> -Site is perfectly located to allow for the continued expansion of the business park. -It is not impacted by the OPW predictive flooding models. (report included) -Part of the lands are already largely in Industrial use and has been for years and a rezoning would allow for the regularization of this area. -Development of this block of land would allow a proposal to be developed that would further protect the existing estate from potential overland flooding from the Camac river. This flooding has gotten worse in recent years due possibly to development in Rathcoole without properly addressing the problem of capacity in the Camac. <p>(DRAFTDEVPLAN0099, Con McCarthy, Sandymark)</p>	Map 4	<p>23.47 Ha.</p> <p>RU to EE</p>	<p>Chief Executive's Response and Recommendations The subject issue is the proposal to zone lands to the north of Greenogue Industrial Estate from Rural (RU) to Enterprise and Employment (EE).</p> <p><u>Quantum of enterprise and employment lands</u> With regard to the existing quantum of enterprise and employment lands to serve the County, response to Item 1 above is noted In addition, it is considered that there are significant lands subject to enterprise and employment zoning within the vicinity of the subject lands, within the Greenogue Industrial Estate and on undeveloped lands to south of the Newcastle Road, to cater for such uses. The zoning of additional EE lands is not, therefore, warranted at this time.</p> <p><u>Casement Aerodrome, Baldonnell</u> With regard to the location of the subject site, it is noted that the lands are located to the south of and immediately adjacent to Casement Aerodrome, Baldonnell.</p>

Investments Plc, Sandymark Investments Plc)			<p>Casement Aerodrome, the only secure military aerodrome in the State, does not fall under the control of the Irish Aviation Authority but the ICAO Standards and Recommended Practices are applied as policy by the Department of Defence at Casement Aerodrome. Additionally, the Department of Defence applies two further restricted areas of its own, a circular “Inner Zone” of 2km radius, and a ‘Security Zone’ more closely aligned with the flight strips, which are the areas around the runways.</p> <p>IE Policy 8 of the Draft Plan 2016-2022 states that it is the policy of the Council to safeguard the current and future operational, safety and technical requirements of Casement Aerodrome and to facilitate its ongoing development for military and ancillary uses within a sustainable development framework. Objectives under IE Policy 8 include restricting development in the environs of Casement Aerodrome to ensure same. Section 11.6.6 of the Draft Plan 2016-2022, regarding Implementation: Aerodromes, outlines a number of restrictions pertaining to development within the Security Zone adjacent to the Aerodrome, including in relation to a sterile zone relative to the Aerodrome boundary fence and building restrictions.</p> <p>The subject lands are located predominantly within the Department of Defence Zone of Casement Aerodrome; in this context it is not recommended to zone lands for development within the security zone.</p> <p><u>Flood risk</u> As part of the County Development Plan and SEA process 2016-2022, a Strategic Flood Risk Assessment (SFRA) was carried out for the County. Additionally, the Eastern CFRAM study draft mapping is available and also identifies areas in the County as having a potential risk. The foregoing data set provides an evidence base on flood risk in the County.</p> <p>The studies identify a small portion of the subject lands as being</p>
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		<p>in flood risk zone A and a more significant portion within food risk zone B.</p> <p>The Guidelines for Planning Authorities on Flood Risk Management were published by the OPW and DECLG in 2009. The Flood Risk Management Guidelines advise in relation to Flood Zones that the planning implications for each of the flood zones are:</p> <p><i>Zone A - High probability of flooding. Most types of development would be considered inappropriate in this zone. Development in this zone should be avoided and/or only considered in exceptional circumstances, such as in city and town centres, or in the case of essential infrastructure that cannot be located elsewhere, and where the Justification Test has been applied. Only water-compatible development, such as docks and marinas, dockside activities that require a waterside location, amenity open space, outdoor sports and recreation, would be considered appropriate in this zone.</i></p> <p><i>Zone B - Moderate probability of flooding. Highly vulnerable development, such as hospitals, residential care homes, Garda, fire and ambulance stations, dwelling houses and primary strategic transport and utilities infrastructure, would generally be considered inappropriate in this zone, unless the requirements of the Justification Test can be met. Less vulnerable development, such as retail, commercial and industrial uses, sites used for short-let for caravans and camping and secondary strategic transport and utilities infrastructure, and water-compatible development might be considered appropriate in this zone. <u>In general however, less vulnerable development should only be considered in this zone if adequate lands or sites are not available in Zone C*</u> and subject to a flood risk assessment to the appropriate level of detail to demonstrate that flood risk to and from the development can or will adequately be managed.</i></p> <p><i>*Zone C lands are those with a low probability of flooding, with</i></p>
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			<p><i>development in this zone generally acceptable from a flood risk perspective, subject to compliance with relevant policies and objectives of the land use and zoning objective, and subject to assessment of flood hazard from sources other than rivers/coastlines.</i></p> <p>In this context, the proposal to rezone these lands as EE is not recommended as there are adequate lands and sites zoned EE available in the immediate vicinity of the site. In addition, it is recommended that the subject lands at Baldonnell are zoned for Rural 'RU', in line with the 'precautionary approach' regarding flood risk.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>3. Request to rezone lands at Keatingspark, Rathcoole, currently in use as a truck and machinery hire depot, storage yard and bus depot, from proposed zoning objective RU (zoned B under current Plan) to zoning objective EE which would permit exiting operations on site to continue and modernise, as well as facilitate associated enterprise and employment-related uses compliant with use classes permitted under EE zoning. Submission indicates that proposed rezoning would be consistent with a number of Enterprise and Employment Objectives in the Plan, and that any future development on the lands lying in the direct flight path from Baldonnell Airport would strictly adhere to IAA and Military requirements. (DRAFTDEVPLAN0246, Joe Bonner, Joe Bonner Planning, Lee Cullen & Richard Mockler in receivership)</p>	Map 7	10.59 Ha. RU to EE	<p>Chief Executive's Response and Recommendations The subject issue is the proposal to zone at Keatingspark, Rathcoole, from Rural (RU) to Enterprise and Employment (EE).</p> <p><u>Extent of Proposed Lands within Small Town</u> Further to the response to Item 1 above regarding Core Strategy requirements, it is noted that the subject lands are zoned to prevent a sprawl of development beyond the core boundary of Rathcoole and into rural areas of the County. Rathcoole has been designated as a Small Town under the Draft Plan's Core Strategy in accordance with the requirements of the Regional Planning Guidelines for the Greater Dublin Area 2010-2022.</p> <p>It is stated under the Regional Planning Guidelines that levels of growth in all small towns shall be managed in line with the ability of local services to cater for any growth, responding to local demand. The guidelines on Sustainable Residential Development in Urban Areas 2009, also advise that Small Towns should be</p>

			<p>developed as compact towns and should prioritise the development of brownfield and backland sites and expansion should be based on a number of well integrated sites. The proposal to rezone lands beyond the edge of a defined settlement it not, therefore, considered appropriate in this instance.</p> <p><u>Quantum of enterprise and employment lands</u> With regard to the existing quantum of enterprise and employment lands to serve the County, response to Item 1 above is noted. In addition, it is considered that there are significant lands subject to enterprise and employment zoning within the vicinity of the subject lands, within the Greenogue Industrial Estate and on undeveloped lands to south of the Newcastle Road, to cater for such uses. The zoning of additional EE lands is not, therefore, warranted at this time. It is also noted that land use zoning is strategic in nature and incremental retrofitting of zoning objectives to match the established use on small plots of land is not recommended as it undermines the core strategy of the Plan.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>4. Submission on behalf of landowner requests that 3.4 ha. of lands located in Corkagh Dublin 22 be zoned from Objective 'OS' (open space and recreational amenities) to Objective 'EE' (enterprise and employment) by reason of:</p> <ul style="list-style-type: none"> - The established employment, warehousing, distribution and auction uses on the site; - Location of the lands within the urban fringe with access from the Green Isle Road, which links with the N7 and Boot/Fonthill Road; 	Map 4	<p>3.4 Ha.</p> <p>OS to EE</p>	<p>Chief Executive's Response and Recommendations The subject issue is the proposal to zone lands to the immediate north of the Kingswood Interchange from Open Space (OS) to Enterprise and Employment (EE).</p> <p><u>Quantum of enterprise and employment lands</u> With regard to the existing quantum of enterprise and employment lands to serve the County, response to Item 1 above is noted. In addition, it is considered that there are significant lands subject to enterprise and employment zoning within the</p>

<p>- Access to public utilities. (DRAFTDEVPLAN0181, John Murphy, BMA Planning, Wilsons Auctions DRAFTDEVPLAN0330, BMA Planning, BMA Planning, Wilsons Auctions)</p>			<p>vicinity of the subject lands, including the Greenogue and Aerodrome Business Parks, to cater for such uses. The zoning of additional EE lands is not, therefore, warranted at this time. It is also noted that land use zoning is strategic in nature and incremental retrofitting of zoning objectives to match the established use on small plots of land is not recommended as it undermines the core strategy of the Plan.</p> <p><u>Existing/permitted uses</u> The submission makes reference to the potential conflict of OS zoning and the existing commercial uses currently operated on site. It is noted that the application of a zoning objective on a site/s does not preclude the existing use of a particular site or property. The wording of Section 11.1.1 of the Draft Plan with regard to Other Uses and Non Conforming Uses is also noted in this regard.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>5. Submission outlines that as part of the 2016-2022 County Draft Development Plan, the Clonburris Strategic Development Zone has been extended westward to now include a parcel of land bordered by Newcastle Road to the west, the future Griffeen Park to the railway line to the north and the canal to the south. Should this land be zoned Residential, the only access point will be onto the already contentious and congested Newcastle Road. For a sustainable living and working future for Lucan we need to bring jobs to Lucan. Submitted that given its location and suitability, the Council should strongly consider zoning this land for Small and Medium Enterprise.</p>	<p>Map 1/4</p>	<p>16.78 Ha. RES-N to EE</p>	<p>Chief Executive's Response and Recommendations The subject issue is the proposal to zone lands to the north of the Grand Canal and adjacent to the Newcastle/Lock Road from Rural (RU) to Enterprise and Employment (EE).</p> <p><u>Core Strategy Requirements</u> The response to Item 1 above is noted with regard to the proposal to change the zoning of the subject lands from RES-N to EE.</p> <p><u>Permitted Uses</u> With regard to permitted uses, it is noted that the proposed RES-N zoning objective allows for a multitude of commercial and enterprise uses on the subject lands, including Industry-Light,</p>

<p>(DRAFTDEVPLAN0130, Peter Corby, Griffeen Glen Residents Association)</p>			<p>and Offices less than 100sq.m as permitted in principle uses, and Industry-General, Live-Work Units, Office-Based Industry, Offices 100sq.m-1,000sq.m, and Science and Technology Based Enterprise as open for consideration uses.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>6. Request for rezoning of lands to EE at Collegelands, Rathcoole. The lands are located between Greenogue, Aerodrome Business Park and Casement Aerodrome. Proposal would be in accordance with variation 2 of the 2010 - 2016 CDP which allows Planning Authority to consider development within the Aerodrome Security zone. Submission outlines the land is free draining and is not liable to flooding. It is contended that the lands are 'infill' and are located adjacent to the Rathcoole interchange. (DRAFTDEVPLAN0280, Johnny Janssens, Johnny Janssens)</p>	<p>Map 4/8</p>	<p>117.47 Ha. RU to EE</p>	<p>Chief Executive's Response and Recommendations The subject issue is the proposal to zone lands to the north of Greenogue Industrial Estate from Rural (RU) to Enterprise and Employment (EE). It is noted that while the submission refers to a submitted map, no evidence of same was found.</p> <p><u>Quantum of enterprise and employment lands</u> The response in relation to Item 1 above it noted with regard to the quantum of existing lands zoned for enterprise and employment uses.</p> <p><u>Casement Aerodrome, Baldonnell</u> Notwithstanding lack of clarity regarding the exact parameters of the subject lands, the response in relation to Item 2 above is noted with regard to Casement Aerodrome, including its Security Zone.</p> <p><u>Flood risk</u> Notwithstanding lack of clarity regarding the exact parameters of the subject lands, the response in relation to Item 2 above is noted with regard to flood risk.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>

<p>7. Submission requests retention of existing 'employment' zoning objective on subject lands at Baldonnell. (DRAFTDEVPLAN0168, John Fingleton, Fingleton White, Fingleton White DRAFTDEVPLAN0376, Hugh O'Daly, H K O'Daly & Associates , Mr Cyril Downling and Mr Louis Fitzgerald)</p>	<p>Map 4</p>	<p>24.69 Ha. RU to EE</p>	<p>Chief Executive's Response and Recommendations The subject issue is the proposal to zone lands at Moneenalion Commons Lower. Baldonnell, from Rural (RU) to Enterprise and Employment (EE).</p> <p><u>Flood risk</u> As part of the County Development Plan and SEA process 2016-2022, a Strategic Flood Risk Assessment (SFRA) was carried out for the County, with a further report on Flood Risk Assessment also carried out subsequently due to the lands located at Moneenalion Commons being identified in the County study as having a potential risk. Additionally, the Eastern CFRAM study mapping identifies the area as having a potential risk. The foregoing provides an evidence base on flood risk in the County. The studies identify a significant portion of the site in question as being in flood risk zone A, with 'a high probability of flooding'. The Guidelines for Planning Authorities on Flood Risk Management were published by the OPW and DECLG in 2009.</p> <p>In accordance with Section 4 of the Guidelines, which specifically refers to "existing, undeveloped, zoned areas at risk of flooding", and Sections 4.26 and 4.27 which states that "future flood risk assessments required to support the development plan process may highlight existing, undeveloped areas which, on their own merits, were zoned for development in previous development plans but which new information indicates may now, or in the future, be at risk of flooding", the process of preparing the Draft Plan reconsidered the zoning of these lands and the Draft Plan provides for a Rural (RU) zoning.</p> <p>The submission seeks to provide for an 'EE' zoning. With regard to Flood Zone A, the Flood Risk Management Guidelines advise that "most types of development would be considered inappropriate in this zone", and that "development in this zone should be avoided and/or considered only in exceptional circumstances". These 'exceptional circumstances' require all</p>
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		<p>parts of a Development Plan justification test to be met “on a solid evidence basis”. It is considered that on the basis of the information currently available to the Planning Authority, this cannot be met in respect of the subject lands i.e. this is because the Planning Authority is not satisfied that “it can be demonstrated on a solid evidence base that the zoning or designation for development will satisfy the justification test”.</p> <p>The DECLG Planning Policy Statement 2015, reiterates the Key Principles that should be used as a strategic guide to implementing proper planning and sustainable development of urban and rural areas, and states that planning must be plan-led and evidence based. This follows on from the 2010 Planning Act, which requires an evidence based ‘core strategy’ as the basis for all County Development Plans.</p> <p>The Chief Executive recommends that the subject lands at Baldonnell be zoned for Rural ‘RU’. This recommendation is based on evidence and information detailed in specifically commissioned reports prepared by independent consultants for the County Development Plan and the OPW produced Eastern CFRAM, as stated above. Given the extent and location of flood risk zone A on the lands in question, it is considered the retention of a Rural (RU) zoning where the lands remain undeveloped is the most appropriate course of action, in line with the ‘precautionary approach’, which requires planning authorities to consider possible future changes in flood risk including the effects of climate change “so that future occupants are not subject to unacceptable risks”. In effect this equates to conservative zoning where risk has been identified. The RU zoning of the subject lands is therefore considered appropriate in this instance.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
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<p>8. Request to rezone lands at existing filling station at Tootenhill, Rathcoole, to proposed zoning objective REGEN or EE on the basis that the current rural zoning of the subject lands is inappropriate and does not reflect the commercial nature of the exiting development on site.</p> <p>The submission states that the REGEN or EE zoning objectives 'would be contiguous to existing zoned lands and therefore would accord with the principle of zoning in a sequential manner from the town centre out'.</p> <p>Submission notes that it is the intention of the applicant to redevelop the overall site as a HGV/coach parking area.</p> <p>Submission requests that in the absence of rezoning the subject lands, as requested, that a specific local objective to improve safety at the existing online location be provided through the provision of improved online HGV facilities and additional circulation and parking for all vehicles.</p> <p>(DRAFTDEVPLAN0198, David Mulcahy, David Mulcahy Planning Consultants Ltd, Petrogas Group PLC)</p>	<p>Map 7</p>	<p>01.42 Ha.</p> <p>RU to EE or REGEN</p>	<p>Chief Executive's Response and Recommendations</p> <p>The subject issue is the proposal to zone lands at the western extent of Rathcoole, accessed from the N7, from Rural (RU) to Enterprise and Employment (EE).</p> <p><u>Extent of Proposed Lands within Small Town</u></p> <p>By reason of the access and orientation of the subject lands, specifically its relationship with the N7, the response to Item 3 above is noted with regard to the location and context of the subject site relative to Rathcoole.</p> <p><u>Quantum of enterprise and employment lands</u></p> <p>With regard to the existing quantum of enterprise and employment lands to serve the County, response to Item 1 above is noted. It is also noted that land use zoning is strategic in nature and incremental retrofitting of zoning objectives to match the established use on small plots of land is not recommended as it undermines the core strategy of the Plan.</p> <p><u>Flood risk</u></p> <p>The SDCC SFRA and Eastern CFRAM study draft mapping identify a portion of the subject lands as being in flood risk zone A and a more significant portion within food risk zone B. The response to Item 2 is noted in this regard.</p> <p><u>Existing/permitted uses</u></p> <p>The submission makes reference to the existing filling station use of the site, and future development of same. It is noted that the application of a zoning objective on a site/s does not preclude the existing use of a particular site or property. Furthermore, it is noted that under the RU zoning matrix, Heavy Vehicle Park use is open for consideration. Any proposals relating to same will be assessed on its merits having regard to compliance with relevant policies and objectives of the Draft Plan.</p>
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			<p><u>Specific Local Objective (SLO)</u> The provision of an SLO in the absence of a change to the zoning objective of the subject lands, as referenced in a submission received, would essentially bypass policy and criteria contained in County Development Plan that sets out to ensure that development is assessed from first principles and occurs in appropriate resodareas of the County. The provision of an SLO for the subject lands is not, therefore, recommended.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>9. Submission from landowner of 32 ha in 3 parcels (A, B & C) to the north of the M7 at Baldonnell. Parcel C represents the established car distribution facility and the submission requests the following for parcel A & B:</p> <ul style="list-style-type: none"> - Parcel A (c5ha) be zoned EE from RU to allow for future expansion of existing distribution centre. Submission details the importance of the lands to the expansion of the National Vehicle Distribution's long term viability and the location within the Inner Approach Area of Casement should not affect its zoning. - Parcel B (c6ha) be zoned EE from RU to reflect the permitted and developed car storage facility. Permitted development is a non-conforming use and the zoning will rectify and be in accordance with the Employment policies of the Draft plan. <p>In addition, the submission details that the 'Transport Depot' is listed as 'Not Permitted' use on RU lands (previously 'Open for Consideration' in 'B' zone of 2010 - 2016 Plan). This change has implications for NVD and</p>	Map 4/8	33.05 Ha. RU to EE	<p>Chief Executive's Response and Recommendations The subject issue is the proposal to zone two portions of an overall landholding at Baldonnell from Rural (RU) to Enterprise and Employment (EE).</p> <p><u>Casement Aerodrome, Baldonnell</u> It is noted that the overall lands are located to the immediate southeast of Casement Aerodrome, Baldonnell, with the lands subject to the proposed rezoning located within the Inner Approach Area of Casement, and abutting the Security Zone of the aerodrome.</p> <p>Casement Aerodrome, the only secure military aerodrome in the State, does not fall under the control of the Irish Aviation Authority but the ICAO Standards and Recommended Practices are applied as policy by the Department of Defence at Casement Aerodrome. Additionally, the Department of Defence applies two further restricted areas of its own, a circular "Inner Zone" of 2km radius, and a 'Security Zone' more closely aligned with the flight strips, which are the areas around the runways.</p>

<p>prevents business expansion without a change in zoning. (DRAFTDEVPLAN0295, Tom Phillips, Tom Phillips & Associates, National Vehicle Distribution)</p>		<p>IE Policy 8 of the Draft Plan 2016-2022 states that it is the policy of the Council to safeguard the current and future operational, safety and technical requirements of Casement Aerodrome and to facilitate its ongoing development for military and ancillary uses within a sustainable development framework. Objectives under IE Policy 8 include restricting development in the environs of Casement Aerodrome to ensure same. Section 11.6.6 of the Draft Plan 2016-2022, regarding Implementation: Aerodromes, details restrictions pertaining to the Inner Approach Area of the aerodrome. Section also outlines a number of restrictions pertaining to development within the Security Zone adjacent to the Aerodrome, including in relation to a sterile zone relative to the Aerodrome boundary fence and building restrictions.</p> <p>The subject lands are within the Department of Defence Inner Approach Area and abutting the Security Zone of Casement Aerodrome; in this context it is not recommended to zone lands for development within this zone.</p> <p><u>Flood risk</u> The SDCC SFRA and Eastern CFRAM study draft mapping identify a portion of the subject lands as being in flood risk zone A and a more significant portion within food risk zone B. The response to Item 2 is noted in this regard.</p> <p><u>Quantum of enterprise and employment lands</u> The response in relation to Item 1 above it noted with regard to the quantum of existing lands zoned for enterprise and employment uses.</p> <p><u>Existing/permitted uses</u> The submission makes reference to the potential conflict of the RU zoning and the existing commercial uses currently operated on site. It is noted that the application of a zoning objective on a site/s does not preclude the existing use of a particular site or</p>
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			<p>property. The wording of Section 11.1.1 of the Draft Plan with regard to Other Uses and Non Conforming Uses is also noted in this regard.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>10. Request to rezone lands at Finnstown, to the south of the Grand Canal and currently farmed (forming part of an overall landholding which includes lands to the north of the Canal), from RU to EE on the basis that the sustainability of the existing farm is undermined by an unsupervised interface between the subject lands and Grand Canal, and public access to same; and that the lands, if rezoned, would provide sites needed for future growth potential. (DRAFTDEVPLAN0275, John F. O'Connor, JFOC Design & Planning, Henry & Ted Crowley)</p>	Map 3/4	<p>40.28 Ha</p> <p>RU to EE</p>	<p>Chief Executive's Response and Recommendations The subject issue is the proposal to zone lands to the south of the Grand Canal from Rural (RU) to Enterprise and Employment (EE).</p> <p><u>Quantum of enterprise and employment lands</u> With regard to the existing quantum of enterprise and employment lands to serve the County, response to Item 1 above is noted. In addition, it is considered that there are significant lands subject to enterprise and employment zoning within the vicinity of the subject lands at Grange Castle to cater for such uses at present. It is also considered that the rezoning of the subject lands from RU to EE may be premature pending the build out of Grange Castle and development of road infrastructure in the area. The zoning of additional EE lands is not, therefore, warranted at this time.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>11. Request for rezoning of surplus lands at Peamount, located to the south of the overall Peamount lands (south of the R120) for enterprise and employment purposes (proposed zoning objective EE) on the basis that: - the lands, if rezoned, would provide an appropriate</p>	Map 3/4	<p>62.71 Ha</p> <p>RU to EE</p>	<p>Chief Executive's Response and Recommendations The subject issue is the proposal to zone greenfield lands to the south of Peamount Hospital from Rural (RU) to Enterprise and Employment (EE).</p> <p>It is noted that the subject lands are located within an extensive</p>

<p>extension of existing EE zoned lands in the vicinity (ie: Grange Castle Industrial Estate to the east and Greenogue Industrial Estate to the south), consolidating and existing pattern of industrial development in the County,</p> <ul style="list-style-type: none"> - rezoning of the subject lands would enable further development of the Peamount campus, to become an international leader in delivering and promoting rehabilitation and continuing care services, - the subject lands are strategically located; proximate to public transport, developing centres of population, and road infrastructure, and proximate to services available to serve the lands, - the lands, if rezoned, would contribute to the supply of industrial and warehousing lands in the County, which is currently low, - there is insufficient land zoned for enterprise and employment purposes in the Draft Plan; the lands, if rezoned, would provide for employment opportunities in the County, - the development of the subject lands and surrounding area would harness the potential of new road infrastructure to be provided under SLOs of the current and draft Plans, ensure the effective utilisation of these roads, and provide additional funding to secure their delivery through development contributions. - any future employment development would not negatively detrimental impact upon the character or setting of protected structures located on/in the vicinity of the subject lands. <p>(DRAFTDEVPLAN0200, Robert Keran, John Spain Associates, Peamount Healthcare DRAFTDEVPLAN0344, John Spain Associates, John Spain Associates, Peamount Healthcare)</p>			<p>overall landholding at Peamount, and are referred to in the submission as “surplus lands at Peamount (i.e. those not required for existing and future provision of rehabilitation and continuing care facilities)”.</p> <p><u>Quantum of enterprise and employment lands</u></p> <p>With regard to the existing quantum of enterprise and employment lands to serve the County, response to Item 1 above is noted. In addition, it is considered that there are significant lands subject to enterprise and employment zoning within the vicinity of the subject lands at Grange Castle to cater for such uses at present. It is also considered that the rezoning of the subject lands from RU to EE may be premature pending the build out of Grange Castle and development of road infrastructure in the area.</p> <p>The zoning of additional EE lands is not, therefore, warranted at this time.</p> <p><u>Casement Aerodrome, Baldonnell</u></p> <p>It is noted that the subject lands are located to the immediate northeast of Casement Aerodrome, Baldonnell, with the lands subject to the proposed rezoning overlapping with the Inner Approach Area of Casement. The response to Item 9 above is noted in this regard.</p> <p><u>Specific Local Objective (SLO)</u></p> <p>It is noted that the proposal to include an SLO for Peamount under the Draft Plan is addressed under Section 3.12.0 of this report regarding Healthcare Facilities.</p> <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p>
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Zoning – Urban Centre & Retail

Submission	Map No.	Site Area /Zoning	Response/Recommendation
Urban Centres			
<p>1. Submission on behalf of Newlands Garden Centre, New Road Clondalkin requests that the zoning of the garden centre be changed from Objective 'A' (residential) to Objective 'LC' Local Centre for reason of the following:</p> <ul style="list-style-type: none"> - The rezoning would reflect the existing and longstanding commercial/retail use of the site; - The subject site is located in an urban area with extensive areas of residential and commercial land use; - The site is strategically located to accommodate local centre development having regard to road infrastructure around Newlands Cross and the existing and planned public transport infrastructure including Metro West, which will allow for a more efficient and sustainable pattern of development; - The proposed zoning would provide for a range of lower order local centre facilities. This would consolidate the existing Local Centre opposite the subject site and serve the needs of the local community and catchment area; - The rezoning would still provide the opportunity for a Local Centre to be complemented by a residential component. <p>(DRAFTDEVPLAN0193, John Tierney, John</p>	5	<p>0.83 Ha.</p> <p>RES - LC</p>	<p>Chief Executive's Response and Recommendation</p> <p>The subject site currently accommodates Newlands Garden Centre at New Road Clondalkin. The site is zoned 'A' Residential in the current 2010 – 2016 County Development Plan and the equivalent 'RES' in the Draft Plan. The site is approximately 0.83 ha and accommodates a single business.</p> <p>The submission states that a 'LC' zoning will support the existing retail/commercial use. The Chief Executive considers that the provision of a zoning objective on a site/s does not preclude the existing use of a particular site or property continuing operation and it is not an indication of not supporting the enterprise. Furthermore, in this context, a 'Garden Centre' use is open for consideration under the 'RES' zoning objective in Table 11.2. Land use zoning is strategic in nature and incremental retrofitting of zoning objectives to match the established use on small plots of land is not recommended as it undermines the Core Strategy of the Plan.</p> <p>The subject site is located in close proximity to Clondalkin and there are two existing parades of units (St Brigid's Road & Newlands Retail Centre) zoned as Local Centre within 200m of the Garden Centre. Section 5.1.4 of the Draft Plan details that it is the policy of the Council to encourage the provision of an appropriate mix, range and type of uses in Local Centres, including retail, community, recreational, medical and childcare uses, at a scale that caters predominantly for a local level catchment, subject to the protection of the residential amenities of the surrounding area.</p> <p>Additionally, it is an objective of the Draft Plan to ensure that the scale and type of retail offer in Local Centres is sufficient to serve a local catchment, without adversely impacting on or drawing trade from higher order retail centres.</p> <p>Having regard to the location of the subject site in proximity to Clondalkin and the</p>

Spain Associates , M J Devitt DRAFTDEVPLAN0347, John Spain Associates, John Spain Associates, M J Devitt)			<p>provision of two local centres immediately adjacent to the site, it is recommended that a 'LC' zoning is inappropriate. The 'RES' zoning does not preclude the continuing operation of the Garden Centre and is considered appropriate.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>2. Objection to zoning of 'Foxhunter Site' located off N4 under Zoning Objective RW (Retail Warehousing) by reason of proximity to neighbouring housing, adequate provision of retail warehousing in the locality, relatively small size of the site and difficulty in accessing the site and the potential to add to existing traffic congestion and negatively impact on road safety. An alternative zoning objectives with a diverse range of potential uses such as "REGEN" is suggested. (DRAFTDEVPLAN0242, Paul O'Connell, Paul O'Connell & Associates)</p>	<p>Map 2</p>	<p>1.17 Ha. RW to REGEN</p>	<p>Chief Executive's Response and Recommendation The Foxhunters pub site is zoned 'RW' in the Draft Plan. The submission recommends that a REGEN zoning be adopted for the site. The zoning objective for REGEN is 'to facilitate enterprise and/or residential-led regeneration' The land use zoning matrices in the Draft Plan 2016-2022 are representative of policies and objectives in the Draft Plan pertaining to specific land use zoning objectives. The Regeneration (REGEN) zoning objective has been introduced to support and facilitate the regeneration of underutilised industrial lands that are proximate to town centres and/or public transport nodes for more intensive enterprise and residential-led regeneration. Having regard to the scale of the Foxhunter site, the distance of the site from similar sites, town centres and high quality public transport, it is considered that the Regeneration zoning is not appropriate at this location.</p> <p>Permission was granted for a residential development under SD05A/0409 and an Exempt Development Declaration was issued in 2014 to Avoca Handweavers Ltd for the change of use of the premises to a local amenity 'Artisan Food and Craft Shop' and maintenance of the existing restaurant and ancillary facilities in their existing use. Avoca Handweavers Ltd has not implemented this exempted change of use to date.</p> <p>The content of the submission is noted and the Chief Executive notes that a RW zoning was implemented at the formulation of the Draft Plan. In the event of reconsidering the zoning from RW, it is considered that a residential zoning may be appropriate to achieve the flexibility requested and would put an emphasis on the protection of residential amenity. Furthermore, the 'RES' zoning would be consistent with most public houses outside a designated centre in the County.</p>

			Recommendation It is not recommended that the Draft County Development Plan be amended.
3. Objection to proposed rezoning of lands at Kingswood Village from existing zoning objective LC to proposed zoning objective RES, on the basis that it would prevent further commercial development of said lands thus restricting employment opportunities, and prevent the opportunity for mixed-use development which would contribute to the development of Kingswood as a village. (DRAFTDEVPLAN0377, Hugh O'Daly, H K O'Daly & Associates , Mr William James)	Map 8		Chief Executive's Response and Recommendation The review of the Development Plan and the preparation of the Draft Plan rationalised the zoning provision at Kingswood. The review reduced the amount of Local Centre zoning at this location to cluster and concentrate commercial and centre uses and provide a centre proportionate to the overall size of the area. In the context of the policy framework outlined in Chapter 5 of the Draft Plan and the strategic role of Kingswood, it is considered that the quantum of LC zoned lands is adequate. The provision of commercial uses are generally open for consideration on RES lands and can be assessed on their merits at planning application stage. Recommendation It is not recommended that the Draft County Development Plan be amended.
4. To zone the existing Lidl Store at Ballyfermot Road to 'local centre'. (DRAFTDEVPLAN0190, Fintan Morrin , The Planning Partnership, Lidl Ireland GmbH)	Map 2	1.3 Ha. EE to LC	The subject site accommodates an existing Lidl store and is accessed from the Ballyfermot Road. The site is part of Cherry Orchard Industrial Estate and is zoned 'EE' in the Draft Plan with an objective to provide for enterprise and employment related uses. The submission states that a 'LC' zoning would be appropriate due to the established retail use on the site and that such a zoning could also encourage the consolidation of local services at this location and would not result in any significant intensification of convenience retailing. The Chief Executive considers that the provision of a zoning objective on a site/s does not preclude the existing use of a particular site or property continuing operation. Additionally, Section 11.1.1 includes provision for the consideration of development proposals of existing land uses that are non-conforming with the zoning objective. Land use zoning is strategic in nature and incremental retrofitting of zoning objectives to match the existing use on small plots of land is not recommended as it undermines the core strategy of the Plan.

			<p>The subject site is located in close proximity to Ballyfermot and the Dublin City Council Development Plan 2011 – 2017 reflects same through Zone Z3 ‘to provide for and improve neighbourhood facilities’ and Zone Z4 ‘to provide for and improve mixed services facilities’ designations.</p> <p>Section 5.1.4 of the Draft Plan details that it is the policy of the Council to encourage the provision of an appropriate mix, range and type of uses in Local Centres, including retail, community, recreational, medical and childcare uses, at a scale that caters predominantly for a local level catchment, subject to the protection of the residential amenities of the surrounding area.</p> <p>Having regard to the location of the subject site in proximity to Ballyfermot and the provision of centres adjacent to the site, it is recommended that a ‘LC’ zoning is inappropriate and the appropriate mix, range and type of uses promoted in Local Centres, including retail, community, recreational, medical and childcare uses, should be directed to the established centres in the area.</p> <p>The ‘EE’ zoning does not preclude the continuing operation of the Lidl store and is considered appropriate.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>5. To zone the existing Lidl Store and surrounding mixed use complex at Whitestown Way to ‘town centre’. (DRAFTDEVPLAN0190, Fintan Morrin , The Planning Partnership, Lidl Ireland GmbH)</p>	Map X	Ha. REGEN to TC	<p>Chief Executive’s Response and Recommendation The subject issue is the proposal to zone lands at the junction of the N81 and Whitestown Way from Regeneration (REGEN) zoning to Town Centre (TC).</p> <p>A Regeneration (REGEN) Zoning Objective has been introduced in the Draft Plan 2016-2022 and applied principally to lands adjoining Tallaght Town Centre and Walkinstown. The REGEN zone has the flexibility to accommodate residential led development, subject to compliance with the Draft Plan standards. It is considered that the subject lands, in tandem with the adjacent ‘Fruitfield site’, is a suitable location for REGEN zoning in terms of proximity to transport infrastructure and Tallaght Town Centre.</p>

			Recommendation It is not recommended that the Draft County Development Plan be amended.
6. To zone the existing Lidl Store at Greenhills Road to 'local centre' (DRAFTDEVPLAN0190, Fintan Morrin , The Planning Partnership, Lidl Ireland GmbH)	Map 5	Ha. REGEN to LC	Chief Executive's Response and Recommendation The subject site accommodates an existing Lidl store and is accessed from the Greenhills Road. The site adjacent to Greenhills Industrial Estate and the residential area at St James Road and is zoned 'REGEN' in the Draft Plan with an objective to facilitate enterprise and/or residential led regeneration. The submission submits that the site, and perhaps an area to the rear of same, adjoining St. Bridget's Drive / St. Killian's Avenue, should be zoned as a 'local centre' to reflect the established use of the site. The Chief Executive considers that the provision of a zoning objective on a site/s does not preclude the existing use of a particular site or property continuing operation. Land use zoning is strategic in nature and incremental retrofitting of zoning objectives to match the existing use on small plots of land is not recommended as it undermines the core strategy of the Plan. The Regeneration (REGEN) zoning objective has been introduced to support and facilitate the regeneration of underutilised industrial lands that are proximate to town centres and/or public transport nodes for more intensive enterprise and residential-led regeneration. The subject site is located in close proximity to the underutilised former McHugh's Shopping Arcade site on St. James' Road, Greenhills. The Draft Plan includes a specific local objective for this site: UC5 SLO 1: To promote and facilitate appropriate development at the former McHugh's Shopping Arcade site on St. James' Road, Greenhills to provide for both community and commercial services for local residents. Section 5.1.4 of the Draft Plan details that it is the policy of the Council to encourage the provision of an appropriate mix, range and type of uses in Local Centres, including retail, community, recreational, medical and childcare uses, at a scale that caters predominantly for a local level catchment, subject to the

			<p>protection of the residential amenities of the surrounding area.</p> <p>Having regard to the location of the subject site in proximity to Walkinstown and the provision of lands at St James' Road adjacent to the site for local centre, it is recommended that a 'LC' zoning is inappropriate and the appropriate mix, range and type of uses promoted in Local Centres, including retail, community, recreational, medical and childcare uses, should be directed to the established centres in the area.</p> <p>The 'REGEN' zoning does not preclude the continuing operation of the Lidl store and is considered appropriate.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>7. To expand the 'village centre' land use zoning in Newcastle to lands to the south, to provide 'deeper' plots for potential village centre uses including convenience retail. (DRAFTDEVPLAN0190, Fintan Morrin , The Planning Partnership, Lidl Ireland GmbH)</p>	Map 3	<p>1.81 Ha.</p> <p>RES-N to LC</p>	<p>Chief Executive's Response and Recommendation</p> <p>The submission from Lidl details submits that the proposed village centre zone could be extended somewhat to lands to the south, to provide 'deeper' plots for potential village centre uses including convenience retail. This would give a better prospect of the village providing retail and commercial development necessary to service the local population, in keeping with the role of the village, where the population of same is projected to increase to some 4,235 persons by 2022. The Draft Plan provides a compact 'VC' zoning and Core Retail Area for Newcastle to consolidate and enhance the existing commercial activity in the village and to complement the Newcastle Local Area Plan 2012. The VC zoning provides a policy framework to strengthen the traditional villages by improving the public realm, sustainable transport linkages, commercial viability and promoting tourism and heritage value. The Draft Plan aims to provide a policy balance in relation to the provision of modern retail and the consolidation of the Village Centre footprint. The following objectives of the Draft Plan are noted:</p> <p>UC3 Objective 5: To encourage and facilitate the preservation and enhancement of the retail and retail services role of the County's traditional villages.</p> <p>UC3 Objective 6: To encourage and facilitate the re-use and regeneration of</p>

			<p>derelict land and buildings for appropriate centre uses and encourage the full use of buildings and in particular, the use of upper floors and backlands, with due cognisance to the retail sequential approach, quality of urban design, integration and linkages.</p> <p>UC3 Objective 7: To reinforce village centres as a priority location for new mixed use development and to promote and support new development that consolidates the existing urban character with quality of design, integration and linkage as important considerations.</p> <p>R7 Objective 1: To support and facilitate the development of moderate retail, retail services and niche retailing in the traditional village centres.</p> <p>In relation to the provision of retail, it is also an objective of the Draft Plan to consolidate the existing retail centres in the County and promote town, village and district centre vitality and viability through the application of a sequential approach to retail development (R2 Objective 1).</p> <p>The Core Retail Area for Newcastle is defined by the Village Centre (VC) land use zoning boundary and is the defined centre for the purposes of implementing the sequential approach to retail development. It is considered that the 3.3 ha zoned for Village Centre combined with the objectives outlined above provides a prioritised area and policy flexibility to retail operators. The land use class 'Shop – Neighbourhood' is permitted in principle in the RES-N zone and the assessment of applications for retail in this zone will be required to satisfy the sequential approach i.e. demonstrate that more suitable sites are not available within the centre.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
8. To expand the 'village centre' land use zoning in Rathcoole to the north of the main street to provide redevelopment potential for a mix of uses, part of which should include	Map 8	2.94 Ha. RES to VC	<p>Chief Executive's Response and Recommendation The submission from Lidl details that an appropriate extension of the town core in to the north of Rathcoole Main Street would provide substantial redevelopment potential for a mix of uses, part of which should include retail and town centre</p>

<p>retail and town centres uses. (DRAFTDEVPLAN0190, Fintan Morrin , The Planning Partnership, Lidl Ireland GmbH)</p>		<p>uses, to consolidate the town core and facilitate the provision of supermarket type development by providing less constrained sites, as plot sizes, etc. along Main Street may not be conducive to the requirements of modern convenience retailing development, and associated car parking, etc.</p> <p>The Draft Plan provides a compact 'VC' zoning and Core Retail Area for Rathcoole to consolidate and enhance the existing commercial activity in the village and to provide a policy framework to strengthen the traditional villages by improving the public realm, sustainable transport linkages, commercial viability and promoting tourism and heritage value. The Draft Plan aims to provide a policy balance in relation to the provision of modern retail and the consolidation of the Village Centre footprint. The following objectives of the Draft Plan are noted:</p> <p>UC3 Objective 5: To encourage and facilitate the preservation and enhancement of the retail and retail services role of the County's traditional villages.</p> <p>UC3 Objective 6: To encourage and facilitate the re-use and regeneration of derelict land and buildings for appropriate centre uses and encourage the full use of buildings and in particular, the use of upper floors and backlands, with due cognisance to the retail sequential approach, quality of urban design, integration and linkages.</p> <p>UC3 Objective 7: To reinforce village centres as a priority location for new mixed use development and to promote and support new development that consolidates the existing urban character with quality of design, integration and linkage as important considerations.</p> <p>R7 Objective 1: To support and facilitate the development of moderate retail, retail services and niche retailing in the traditional village centres.</p> <p>In relation to the provision of retail, it is also an objective of the Draft Plan to consolidate the existing retail centres in the County and promote town, village and district centre vitality and viability through the application of a sequential approach to retail development (R2 Objective 1).</p> <p>The Core Retail Area for Rathcoole is defined by the Village Centre (VC) land</p>
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			<p>use zoning boundary and is the defined centre for the purposes of implementing the sequential approach to retail development. It is considered that the 3.8 ha zoned for Village Centre combined with the objectives outlined above provides a prioritised area and policy flexibility to retail operators. The land use class 'Shop – Neighbourhood' is open for consideration in the RES zone and the assessment of applications for retail in this zone will be required to satisfy the sequential approach i.e. demonstrate that more suitable sites are not available within the centre.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>9. Request that the Hillcrest Shopping Centre is rezoned DC under which the existing Tesco store is Open for Consideration. This would allow for the flexibility required to facilitate future redevelopment of the Centre and ensure that it can adapt to consumer demand and changing trends in retailing. (DRAFTDEVPLAN0206, Muirenn Duffy, Bilfinger GVA, Tesco Ireland Ltd.)</p>	Map 1	1.51 Ha LC to DC	<p>Chief Executive's Response and Recommendation The subject site predominantly accommodates an existing Tesco store. The site is adjacent to the N4 and residential areas. The site is zoned Local Centre (LC) in the current 2010- 2016 Development Plan and the Draft Plan. The submission requests the provision of a District Centre (DC) zoning to allow for the flexibility required to facilitate future redevelopment of the Centre and ensure that it can adapt to consumer demand and changing trends in retailing.</p> <p>The District Centre (DC) zoning in the Draft Plan has two distinct policy frameworks; namely the urban centre aspect as detailed in Section 5.1.3 and the retail aspect as detailed in Section 5.6.4.</p> <p>In an urban context, it has consistently been Council policy to develop the County's District Centres as multi-faceted, mixed-use, higher density urban centres including residential, commercial, recreational, community and retail uses. As such, the application of a District Centre zoning is more than just about retail provision. The District Centre zonings in the Draft Plan are predominantly located in a suburban environment, geographically located between village and town centres with substantial catchment within walking distance. The subject site at Hillcrest is located in close proximity to Lucan Shopping Centre and Lucan Village. It is considered that the catchment is adequately served at a district level with this provision.</p>

			<p>In terms of the retail aspect, Level 3 centres in the Retail Hierarchy for the Greater Dublin Area that are shopping centres are generally referred to as District Centres. To date in South Dublin, the Level 3 centres are identified by the Retail Strategy for the Greater Dublin Area 2008 – 2016 which includes a Level 3 centre at (inter alia) Lucan and Adamstown SDZ. The Draft Plan sought to provide additional District Centre zonings at Palmerstown, Firhouse and Knocklyon. The submission from the Department of the Environment, Community and Local Government (DECLG) and response by the Chief Executive on this issue are noteworthy (See Section 5 of this report). It is considered that the provision of a Level 3 District Centre at this site is not warranted as the range of activity, catchment and the provision do not satisfy the Retail Strategy for the GDA and the Retail Planning Guidelines (2012) as follows:</p> <p>In Part 6 of the Retail Strategy for the GDA, what constitutes a District Centre is outlined as:</p> <p>District centres vary both in terms of the scale of provision and the size of catchment, due to proximity to a major town centre. Where the centre is close to existing major centres, the scale of retail and mixed provision is lower, with the centre range of shops meeting more basic day to day needs and only small scale range of comparison units trading. Such centres would generally cater for a population of 10,000- 40,000.</p> <p>The Retail Planning Guidelines (2012) define a District Centre as follows: 'Provides a range of retail and non-retail service functions (e.g. banks, post office, local offices, restaurants, public houses, community and cultural facilities) for the community at a level consistent with the function of that centre in the core strategy. They can be purpose built as in new or expanding suburbs or traditional district centres in large cities or town'</p> <p>The subject site is located in close proximity to the identified Level 3 retail centre and District Centre zoned site at Lucan Shopping Centre, Lucan Village Centre and the proposed Level 3 centre at Adamstown. It is considered that the surrounding catchment of Hillcrest is adequately served at Level 3 with this provision.</p> <p>Recommendation</p>
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			It is not recommended that the Draft County Development Plan be amended.
10. Submission requests that the town centre zoning on the Dominican lands in Tallaght be re-instated to replace the Village Centre (VC) zoning. Submission details that the change represents a down zoning, is contrary to the Regional Planning Guidelines settlement hierarchy and reduces the flexibility for the Dominican's in terms of potential future uses and development. (DRAFTDEVPLAN0324, Raymond O'Malley, Kieran O'Malley & Co.Ltd, Dominican Community at St. Mary's Priory, Tallaght)	Map 9	6.7 Ha. VC to TC	<p>Chief Executive's Response and Recommendation</p> <p>The submission requests that the Town Centre (TC) of the current 2010- 2016 Development Plan be re-instated in place of the new Village Centre (VC) zoning at the Dominican Lands in Tallaght.</p> <p>The Draft Plan introduced the VC zoning for the nine traditional village centres of Clondalkin, Lucan, Newcastle, Palmerstown, Rathcoole, Rathfarnham, Saggart, Tallaght and Templeogue. In recognition of the unique historic character of each village and the opportunities offered, particularly in relation to local and niche retailing, tourism and as a focal point for community events and festivals a Village Centre zoning objective is applied to provide a unique policy framework for these areas.</p> <p>It is considered that the subject site of the Dominican lands at Tallaght is a central element in the historic village of Tallaght, is within the Architectural Conservation Area (ACA) and accommodates three protected structures. The Village Centre zoning supports the protection and conservation of the special character of the site and provides for enhanced tourism, residential, commercial, cultural and other uses that are appropriate to the village context.</p> <p>The 'VC' zoning activates Section 5.1.2 of the Draft Plan as applicable to the site and the following objectives are noted:</p> <p>UC3 Objective 1: To protect and conserve the special character of the historic core of the traditional villages and ensure that a full understanding of the archaeological, architectural, urban design and landscape heritage of the villages informs the design approach to new development and renewal, in particular in Architectural Conservation Areas (ACAs).</p> <p>UC3 Objective 2: To promote design standards and densities in traditional village centres, that are informed by the surrounding village and historic context and enhance the specific characteristics of each town or village in terms of design, scale and external finishes.</p>

			<p>UC3 Objective 6: To encourage and facilitate the re-use and regeneration of derelict land and buildings for appropriate centre uses and encourage the full use of buildings and in particular, the use of upper floors and backlands, with due cognisance to the retail sequential approach, quality of urban design, integration and linkages.</p> <p>UC3 Objective 7: To reinforce village centres as a priority location for new mixed use development and to promote and support new development that consolidates the existing urban character with quality of design, integration and linkage as important considerations.</p> <p>The submission contends that the VC zoning will reduce the flexibility of the site for future non-Dominican users and or uses of their buildings. The submission references office development. It is noteworthy that medium sized office (100 sqm – 1,000 sqm), small scale office (less than 100 sqm), Community centre, Residential Institution, Recreational Facility, Restaurant/Café, Cultural Use, Education, Health Centre, Place of Worship and Residential are listed as open for consideration or permitted in principle in the VC Land Use zoning table (see table 11.7 of the Draft Plan). The Chief Executive is of the view that the VC zoning offers significant land use options for the existing buildings and future development.</p> <p>The submission outlines that the provision of a village centre zoning is contrary to its designation as a Metropolitan Consolidation Town in the Regional Planning Guidelines (RPGs). The Draft Plan reinforces the status of Tallaght as the County Town and a Metropolitan Consolidation Town in the Core Strategy and the application of a VC zoning to the historic core will not undermine same. Alternatively, the provision of the zoning presents an opportunity to focus growth around diverse dynamic urban quarters and for opportunities for employment and services in accordance with the RPGs.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>	
11.	Submission from the owners of the	Map	0.13 Ha	Chief Executive's Response and Recommendation

<p>licensed premises known as 'The Gondola' in Newcastle requesting the rezoning of lands from RES-N to VC to allow for the integrated development of the site, facilitating the provision of car parking to service a full frontage development along Main street and on the corner with the new road serving the school.</p> <p>(DRAFTDEVPLAN0359, Jim Brogan, Jim Brogan, Steelworks Tavens Limited c/o Celbridge Manor Hotel)</p>	3	RES-N to VC	<p>The submission requests the zoning of a small plot of land adjacent to an existing public house from RES-N to VC. The Draft Plan provides a compact 'VC' zoning for Newcastle to consolidate and enhance the existing commercial activity in the village and to complement the Newcastle Local Area Plan 2012.</p> <p>The Draft Plan provides a RES-N on the subject plot of land. The RES-N zoning objective 'to provide for new residential communities in accordance with approved plans' provides a variety of land use classes that are permitted in principle including Public House, Community Centre, Shop – Neighbourhood, Education, Industry – Light, Restaurant/ Café.</p> <p>It is considered that the overall policy context, including the land use tables in Section 11.1.1 outline that the RES-N zoning facilitates the integrated development of the site and satisfies the concerns of the submission.</p> <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p>
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Zoning – Rural/Amenity

Submission	Map No.	Site Area/Zoning	Response/Recommendation
Rural			
<p>1. Submission requests the amendment of the proposed zoning of a 44 acre site at Calliaghstown, Rathcoole from 'HA' to 'RU' to enable the opportunity to develop these lands to facilitate an equestrian centre, with a residential cluster as well as outdoor sporting facilities for disabled children.</p> <p>(DRAFTDEVPLAN0192, Olan Crowley, Architects Workshop Limited, Declan Brennan)</p>	11A	17.9 Ha. HA-DM to RU	<p>Chief Executive's Response and Recommendation</p> <p>The subject lands have long been established within the Dublin Mountain Zone since the zoning objective was created under the 1998 County Development Plan. This reflects the upland location of the subject lands above 300 metres Over Datum along the south-western slope of Slievethoul in an area of high visual amenity that includes significant protected views and prospects.</p> <p>The Draft Plan recognises that the diverse topography and landcover of the Dublin Mountains includes areas of natural beauty and ecological importance, which are a key resource. The Landscape Character Assessment of South Dublin County (2015) highlights the high value and sensitivity of the Mountain Area. The protection of this landscape and its environment is therefore a priority of the Draft Plan.</p> <p>Akin to RU zoning objective under the Draft Plan, the HA-DM zoning objective lists recreational facilities and residential development as Open for Consideration. This provides scope for an equestrian centre subject to it being linked to the heritage and amenity value of the Dublin Mountains and assessment against the principles of proper planning and sustainable development and the relevant policies and objectives of the Draft Plan. Both zoning objectives also require residential development to comply with policy in relation to rural areas. This largely negates the need to change the zoning objectives of the lands.</p> <p>It is noted that the housing needs criteria under in the HA-DM zone are more comprehensive and this reflects the policy of the Draft Plan to ensure that new development is directly related to the area's amenity potential or to its use for agriculture, mountain or hill farming.</p>

			<p>Changing the zoning objective of such a large site (18 Ha.) to RU in an area of significant visual amenity would also have significant implications in relation to increasing the scope of uses that would be permitted in principle on the lands including Concrete/Asphalt Plants and extractive industry uses.</p> <p>The zoning proposal would therefore be at variance with Policy 9 of the Draft Plan, which seeks to protect and enhance the (inter alia) visual, environmental, ecological and geological amenity value of the Dublin Mountains.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>2. Objection to rezoning of lands at Edmondstown Park, located at the northern boundary of Edmondstown Golf Club on the basis that development on these lands could force the closure of the existing golf course, that Edmondstown Park is currently operating as a viable agricultural holding, and that the rezoning would be inconsistent with the proper planning and development of the area under this Plan. (DRAFTDEVPLAN0497, Mark Lynch, Edmondstown Golf Club)</p>	10	13.2 Ha. RES to OS	<p>Chief Executive's Response and Recommendation</p> <p><u>Compliance with Core Strategy</u> It is a requirement under the Planning and Development Act 2000 (as amended) for the County Development Plan, including its Core Strategy, to be consistent with the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 and to ensure that sufficient and suitable lands are zoned to meet the population and housing requirements for the County. The Core Strategy in Chapter 1 of the Draft Plan identifies a growth in population of over 26,300 people and a need for over 32,000 dwellings during the lifetimes of the County Development Plan and it is a requirement to ensure that enough lands are zoned for such need and in appropriate places.</p> <p>The subject lands are designated within the Metropolitan Consolidation Area of the Dublin Gateway as identified under the Regional Planning Guidelines. It is policy of the Regional Planning Guidelines (RPGs) to gain maximum benefit from existing assets in the Metropolitan Consolidation Area, including public transport and social infrastructure, through consolidation within the exiting built footprint of the City and the</p>

			<p>Inner Suburbs. This is seen as particularly important as falling occupancy levels and aging populations are placing the viability existing services and facilities such as schools across the Metropolitan Area at risk.</p> <p>The RPGs seek to direct a significant portion of anticipated population and economic growth for the Greater Dublin Area into the Metropolitan Consolidation Area of the Dublin Gateway. This is reflected in the Core Strategy contained in the Draft County Development Plan, which seeks to ensure that there are sufficient zoned lands located within the Metropolitan Consolidation Area in the interest of the proper planning and sustainable development of the County and the Dublin Gateway particularly areas of the County that are capable of being served by high quality social and physical infrastructure, services and facilities.</p> <p>The subject lands are ideally positioned to help meet the population and housing needs of the County in a manner that strengthens and consolidates the inner suburban area of the Dublin Gateway and prevents a sprawl of development beyond the boundaries of the identified settlements and into rural and high amenity areas of the County.</p> <p>The removal of the proposed RES zoning objective from the lands would also reduce the Draft Plan's Housing Land Capacity, particularly in the Metropolitan Consolidation Area, to a point that it would no longer meet the housing needs of the County in sustainable locations in accordance with the statutory requirements of the Regional Planning Guidelines and Planning and Development Legislation.</p> <p><u>Impact on Agricultural Lands and Golf Club</u> Agriculture uses are all listed as open for consideration under the proposed RES zoning objective of the subject lands and the proposed zoning does not affect the exemptions provided for agricultural development as prescribed under the Planning and Development Regulations, 2001.</p>
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<p>3. Submission requests extension of proposed zoning objective HA - DM to encompass Windmill Hill/Windmill Stump on the basis of its historic merit and historic amenity. Submission also requests inclusion of same in Table 4.3.1 [Prospects for which is it an Objective to Protect; South Dublin County Development Plan, 2010-2016]. (DRAFTDEVPLAN0170, Neville Graver, Rathcoole Community Council Limited)</p>	Map 7	50 Ha. RU to HA-DM	<p>Chief Executive's Response and Recommendation Windmill Hill is located within a relatively low lying area of the County on rural lands located approximately 2 kilometres from the Dublin Mountain Zone.</p> <p>The subject lands have long been established within the Rural zone since the zoning objective was created under the 1998 County Development Plan. This reflects the rural location of Windmill Hill in an area separated from the Dublin Mountains by low lying lands. The inappropriate designation of this area within the Dublin Mountain Zone would inappropriately reduce the scope for agriculture, allotments and rural industry development in the area.</p> <p>In recognition of the visual amenity created by Windmill Hill, this site is also already identified as a Prospect under Table 9.2 of the Draft Plan. HCL Policy 8 and its associated objectives seek to improve and preserve such prospects.</p> <p>In recognition of the Architectural Heritage of Windmill Hill, Windmill House is listed a Protected Structure (RPS Ref. 358) under the Draft</p>

			<p>Plan. Where a structure is listed as a protected structure the protection includes land within its curtilage and other structures within that curtilage. This is supported by HCL 3 Objective 1 of the Draft Plan. Furthermore, HCL 3 SLO 3 of the Draft Plan specifically seeks to secure the preservation of Windmill Hill.</p> <p>It is therefore considered not appropriate or necessary to include Windmill Hill within the Dublin Mountain Zone.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>4. Submission proposes the expansion of the 'F' zoned lands at Kiltipper, Tallaght to act as a gateway for Tallaght and Dublin City to the Mountains. Submission from landowner at Ballymana envisages that the expansion of the land and the landowner working in conjunction with SDCC could create considerable employment through eco and agri tourism. (DRAFTDEVPLAN0363, Michael G Clarke, Michael G Clarke, Kennedy and Clarke Families)</p>	<p>Maps 9 & 11</p>	<p>70 Ha. RU & OS to RU</p>	<p>Chief Executive's Response and Recommendation The subject lands have been zoned as either opens space (OS) or as rural (RU) lands under the Draft Plan. This will help ensure for an appropriate transition between the Dublin Mountains, rural lands and open space lands akin to that sought under the subject submission. The RU and OS zoning objectives also provide scope for eco and agri-tourism uses including agriculture, allotments and rural industry</p> <p>It is therefore not necessary to amend the zoning objective of the subject lands.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>

COUNTY DEVELOPMENT PLAN MAP(S)

Housing	
<p>1. Request to remove Traveller Accommodation [TA] mapping objective from lands at Busty Hill, Naas Road by reason of site context and location suitability, and inconsistencies of TA objective on subject site with policies of the current or Draft Development Plans, national policy and planning and sustainable development principles for the location of residential development. (DRAFTDEVPLAN0082, Declan Brassil, Declan Brassil & Co., Harris Group)</p> <p>2. Submission outlines that the Tallaght Echo shows a green space in Springfield as being a potential infill housing site and the County Development Plans Maps do not correspond. Submission seeks clarification. (DRAFTDEVPLAN0035, Andrew O'Meara)</p>	<p>Chief Executive's Response and Recommendation With regard to Traveller Accommodation, the Draft Plan 2016-2022 mapping is reflective of the Traveller Accommodation Programme for the period 2014-2018. The selection of specific individual sites is carried out through the Traveller Accommodation Programme. Section 2.1.4 of the Draft Plan includes for policies and objectives in relation to Traveller Accommodation.</p> <p>With regard to the submission regarding infill housing sites, it is noted that the Draft Plan does not identify infill housing sites at any location in the Council. The provision of sites for social housing is a reserved function of the Council and is generally carried out through the Part 8 process.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
Roads and Public Transport	
<p>1. Request to map transport corridor between Saggart and Hazelhatch in support of TM Policy 2 and TM2 Objective 2. (DRAFTDEVPLAN0178, Dublin South West Green Party)</p>	<p>Chief Executive's Response and Recommendation <u>Mapping of Saggart - Hazelhatch</u> In relation to the mapping of the <i>Saggart – Hazelhatch corridor</i>, (TM) Policy 2 Public Transport includes an Action stating that the Council will:</p> <p>'Investigate a future public rail transport corridor between Saggart and Hazelhatch, linking the greater Tallaght area to the west via Saggart/Citywest, Greenogue/Baldonnell & Newcastle, facilitating future sustainable development'.</p> <p>This route has not been included within the Draft Transport Strategy and as such, the inclusion of the route in the written text is questionable.</p>

	<p>This issue is outlined in detail in Section 6 of this report.</p> <p>Notwithstanding the inclusion of the route in the text, concerns are held in regard to the identification of this route and any mapping of the route would also increase pressure to zone land for development in an area that has not been identified for growth within the core strategy and raise expectation.</p> <p>In this context, it is considered that the mapping of a corridor is premature pending the completion of the Action in Section 6 of the Draft Plan.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
Community and Retail Facilities	
<p>1. Request amendments to Map 2 to clarify location of existing Bush Centre and the Balgaddy Community Centre as Community Facilities. (DRAFTDEVPLAN0274, Lorraine Hennessy, Balgaddy Working Together Group)</p> <p>2. Request amendments to Map 2 to clarify status and extent of existing Rosscourt Local Retail Centre. (DRAFTDEVPLAN0274, Lorraine Hennessy, Balgaddy Working Together Group)</p>	<p>Chief Executive's Response and Recommendation <u>Balgaddy Community Centre</u> The content of the submission in relation to the location of the C1 SLO1 symbol is noted.</p> <p>Recommendation It is recommended that the Draft County Development Plan be amended with regard to the location of the C1 SLO symbol on the map.</p> <p><u>Rossecourt Centre</u> As detailed in Section 3 and Section 5 in this Chief Executive report, the centre at Rosscourt Balgaddy will be zoned Local Centre.</p> <p>Recommendation Amend map at Balgaddy in accordance with recommendations in Section 3 and 5 of this report. (Introduce LC zoning)</p>

Heritage	
<ol style="list-style-type: none"> 1. The removal of tree symbols in the current Draft Development Plan Maps seems at variance with the statement in section 9.5.0, that the Maps identify wooded areas or groups of trees which are of high amenity value and are worthy of protection through the planning process. (DRAFTDEVPLAN0057, Paul Cleary) 2. Reinstate symbol indicating protection and preservation of trees and woodlands. (DRAFTDEVPLAN0212, Doireann Ni Cheallaigh, An Taisce) 3. Submission notes that extent of Edmondstown Golf Club are incorrectly indicated on Development Plan 2016-2022 (and 2010-2016) maps; correct boundary lines are indicated on map included with submission. (DRAFTDEVPLAN0497, Mark Lynch, Edmondstown Golf Club) 4. Submission from DAHG advises that the Local Authority should ensure that it has the most up to date map boundaries for designated sites, which can be seen on www.npws.ie (DRAFTDEVPLAN0510, Simon Dolan, Department of Arts, Heritage and the Gaeltacht) 	<p>Chief Executive Response and Recommendations</p> <p><u>Tree and Woodlands</u></p> <p>The Chief Executive notes the submissions in relation to the removal of the tree symbols on the Draft Plan map. The mapping of the trees and woodland in the current 2010-2016 Plan is considered to be an outdated data set and inaccurate. The provision of inaccurate symbols of trees and woodland on the mapping would be misleading and could be detrimental to the preservation of the trees and woodlands in the County.</p> <p>The Draft Plan provides for the protection of the trees and woodlands through the written text and development proposals and measures will be assessed on their individual merits.</p> <p>The following objectives are noted:</p> <p>HCL 17 Objective 2: To protect existing trees, hedgerows, and woodlands which are of amenity or biodiversity value and/ or contribute to landscape character and ensure that proper provision is made for their protection and management.</p> <p>G2 Objective 9: To preserve, protect and augment trees, groups of trees, woodlands and hedgerows within the County by increasing tree canopy coverage using locally native species and by incorporating them within design proposals and supporting their integration into the Green Infrastructure network.</p> <p>G6 Objective 1: To protect and enhance existing ecological features including tree stands, woodlands, hedgerows and watercourses in all new developments as an essential part of the design process.</p> <p>HCL 10 Objective 3: To ensure that development proposals within the Liffey Valley and Dodder Valley, including local and regional networks of walking and cycling routes, maximise the opportunities for enhancement of existing ecological features and protects and incorporates high value natural heritage features including watercourses, wetlands, grasslands,</p>

	<p>woodlands, mature trees, hedgerows and ditches, as part of the County's Green Infrastructure network</p> <p>HCL 11 Objective 5: To ensure that development along and adjacent to the Grand Canal protects and incorporates high value natural heritage features including watercourses, wetlands, grasslands, woodlands, mature trees, hedgerows and ditches and includes for an appropriate set-back distance or buffer area from the pNHA boundary to facilitate protected species, biodiversity, and a fully functioning Green Infrastructure network.</p> <p>The Chief Executive supports the concept of delineating accurate data for the protection of trees and woodlands on the County Development Plan maps. In the event that an accurate dataset is unavailable in time for the Plan adoption, it is recommended that an Action be inputted into the Plan to complete the desktop survey.</p> <p>Recommendation Amend the map to provide for symbols to reflect existing trees and woodlands to protect same (subject to accurate mapping data of same being available). In the event that the dataset is unavailable in time for the Plan adoption, it is recommended that an Action be inputted into the Plan to complete the desktop survey.</p> <p><u>Designated Sites</u> The Draft Plan mapping utilises the www.npms.ie for the boundaries of the designated sites in the County.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Edmondstown Golf Club Boundary</u></p>
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	<p>Submission notes that extent of Edmondstown Gold Club are incorrectly indicated on Development Plan 2016-2022 (and 2010-2016) maps. The boundary of Golf Clubs are not specifically mapped on the Draft Plan mapping and as such, no change is required to reflect the current ownership boundary in this instance. The zoning provision of the Golf Club does not impact on the day to day functioning of the Club.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
Education Facilities	
<p>1. Request to remove Primary School [PS] mapping objective from lands at Ballycullen. Submission states that Department of Education and Skills has indicated that an alternative site has been identified for educational purposes and they would not be proceeding with the purchase of the subject lands for same. (DRAFTDEVPLAN0108, Tony Manahan, Manahan Planners)</p> <p>2. Request to remove Primary School [PS] mapping objectives from existing open space to north of Killinniny Road, Firhouse. Submission identifies existing sites in the area which are reserved for educational purposes, capacity of existing reserved sites to accommodate more than one school, capacity of existing schools operating in the area, loss of amenity of existing open space, and traffic and transport implications. (DRAFTDEVPLAN0140, Des Cathcart DRAFTDEVPLAN0142, Triona Cathcart DRAFTDEVPLAN0272, Tina & Mark Walsh)</p> <p>3. Submission made on behalf of 'Concerned Residents of Firhouse' objects to proposal to provide two primary school sites in the area of zoned open space between Ballycullen Drive and Killinniny Road on the basis of the following: - The proposed location is not in proximity to the housing that the primary</p>	<p>Chief Executive Response and Recommendations The Chief Executive notes the content of the submissions in relation to the mapping of education facilities in the County.</p> <p>As noted under Section 3.11.0 of the Draft Plan 2016-2022, the Department of Education and Skills is responsible for the delivery of educational facilities and services. South Dublin County Council has worked with the Department of Education and Skills since 2012 under a nationally agreed Memorandum of Understanding (MoU), to proactively identify and acquire sites for new primary and post-primary schools, and to support the Department's Schools Building Programme. The Department of Education and Skills reviews demographic data on an ongoing basis, with requirements for additional schools accommodation identified through same. It is noted that the list of schools detailed in Section 3.14.0 of the Draft Plan was provided by the Department of Education and Skills, arising from their latest projections on the need for school places and provision of new schools in the County.</p> <p>The Department of Education and Skills will commence a new phase of school building during the period 2016-2022, with the location of 'proposed' school sites identified on Draft Development Plan maps based on the assessment process outlined above. The Chief Executive considers that the symbols for schools should be retained. Planning</p>

<p>schools would serve and is also separated from it by a busy regional road.</p> <ul style="list-style-type: none"> - The proposed two primary schools are in addition to the three school sites identified under the Ballycullen-Oldcourt LAP. It is considered excessive to construct five new primary schools in the area. - Contrary to guidelines in the code of practice for planning authorities no justification has been provided in the written statement of the draft county development plan for the provision of five primary school sites in the area. - To include a specific objective for two primary schools on lands that are zoned public open space is contrary to proper planning and sustainable development. - To include a specific objective for two primary schools where such a use is only 'open for consideration' under the zoning objective when adequate provision is made for the same use in a zone where the use is a 'permitted use', is contrary to proper planning and sustainable development. <p>(DRAFTDEVPLAN0148, Hendrik van der Kamp, Hendrik W van der Kamp, Town Planner, Concerned Residents of Firhouse, c/o Paul Crossan DRAFTDEVPLAN0247, Hendrik van der Kamp, Hendrik W van der Kamp, Town Planner, Concerned Residents in Firhouse area)</p> <p>4. Objection to primary school icons/symbols on Map 9 off Ballycullen Drive by reason of potential affect on historic hedgerows and tree, the loss of a football pitch, the need to encourage physical activity amongst children, capacity of schools to provide for a catchment outside of Firhouse/Ballycullen area and the existence of four designated primary school sites in the area. (DRAFTDEVPLAN0255, Yvonne Glavey)</p> <p>5. Objection to two icons representing primary schools on the green at Ballycullen Drive on Map 9 by reason of the existence of sites for 3 new schools in the area. (DRAFTDEVPLAN0256, Mairead Flanagan)</p> <p>6. Submission requests that the two primary schools on the Carrigwood Green be removed as they conflict with C9 Objective 3 'To reserve sites ... in developing area...' and C12 Objective 8 'To retain lands with established recreational uses as open spaces ..' as Firhouse Community Centre Park is</p>	<p>applications for new or extended school facilities in the County will be assessed on a case by case basis and on their merits with regard to issues including identified proposed school sites, compliance with relevant policies, objectives and standards contained within the Plan, compatibility of proposed land use with the zoning objective of subject site, and capacity of existing school facilities.</p> <p>The statutory planning application process facilitates public consultation and appeals of Planning Authority decisions to An Bord Pleanala.</p> <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p>
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<p>included in the list of local parks. (DRAFTDEVPLAN00387, Tom Gurrie)</p>	
<p>NTA Cycle Network</p>	
<ol style="list-style-type: none"> 1. Objection to route of NTA GDA cycle network through Templeroan Estate. (DRAFTDEVPLAN00013, Malachy Magorrian DRAFTDEVPLAN00014, Malachy Magorrian) 2. Objection to route of NTA GDA cycle network through Sally Park. (DRAFTDEVPLAN00042, maureen ferry DRAFTDEVPLAN00088, Ian WhyteDRAFTDEVPLAN0342, Ian Whyte DRAFTDEVPLAN0394, Robert Porter DRAFTDEVPLAN0395, Karl & Mary Kelly DRAFTDEVPLAN0397, Tracy Hollingsworth DRAFTDEVPLAN0398, The Griffin Family DRAFTDEVPLAN0400, Tom & Jean Cantwell) 3. Objection to changes to Kiltipper Drive to accommodate a new cycle path, due to existing parking issues and safety concerns. Suggested use of current walk way/cycle path through Kiltipper Woods care home, which many people already access without issue. (DRAFTDEVPLAN00080, leo maher) 4. Objection to proposed cycle way through existing cul-de-sac at Ellensborough Drive to an adjacent park area due to safety concerns and increased pedestrian traffic. (DRAFTDEVPLAN00093, Sarah Doolan) 5. Objection to proposed cycle way through existing cul-de-sac at Ellensborough Drive to an adjacent park area due to safety concerns and increased pedestrian traffic. (DRAFTDEVPLAN00096, Paul Flynn) 6. Objection to proposed cycle way through existing cul-de-sac at Ellensborough Drive to an adjacent park area due to safety concerns, issues regarding anti-social behaviour, and restriction of parking for 	<p>Chief Executive's Response and Recommendation</p> <p>The Chief Executive notes the content of the submissions received in relation to the mapping of the National Transport Authority (NTA) Cycle Network.</p> <p>The mapped cycle routes were transposed from the National Transport Authority Greater Dublin Cycle Network Plan into the Draft Plan Maps and are indicated in the map legend as 'NTA Greater Dublin Cycle Network Plan'. The NTA Cycle Plan is a network plan and is shown at a wide scale. All routes and projects from the Network Plan will go through a preliminary and detailed design phase prior to any construction.</p> <p>Notwithstanding the above, a number of the submissions raised concerns in relation to specific locations:</p> <p><u>Sally Park</u> The National Transport Authority (NTA) Greater Dublin Cycle Network Plan outlines a strategic cycle route from Tallaght to Ballyboden. The design for the Tallaght to Ballyboden scheme has commenced and went through a Part 8 process in 2012. During this preliminary design stage, the alignment of the route for the Part 8 permission was amended and is different from the NTA Greater Dublin Cycle Network Plan. The Part 8 approved scheme shows that the route does not go through Sally Park. Any construction work on the Tallaght to Ballyboden scheme is intended to be actioned in accordance with the approved Part 8 design.</p> <p>In this instance, the mapping of the network will be amended to show the Part 8 alignment.</p> <p>Recommendation Amend the mapped NTA Greater Dublin Cycle Network Plan to reflect</p>

<p>existing residents of the cul-de-sac. (DRAFTDEVPLAN0095, Marina Reynolds)</p> <p>7. Objection to proposed NTA cycle way through existing cul-de-sac at Ellensborough Drive due to safety concerns, parking issues and increased pedestrian traffic. Also query need for said cycle/walk way due to existing cycle/walk way located within 100m of Ellensborough Drive. (DRAFTDEVPLAN0123, Paul & Geraldine Ferrick)</p> <p>8. Objection to proposed cycle way through existing cul-de-sac at Ellensborough Drive to an adjacent park area due to loss of green areas and existing trees in the cul-de-sac, devaluation of existing Ellensborough Drive properties, safety concerns, and additional footfall/cycle traffic generation. Submission also notes existing access through adjacent Kiltipper Woods nursing home. (DRAFTDEVPLAN0127, Damien Byrne)</p> <p>9. Objection to proposed cycle way through existing cul-de-sac at Ellensborough Drive to an adjacent park area due to existing 'closed' layout of cul-de-sac, security concerns, additional traffic generation, and parking issues. (DRAFTDEVPLAN0141, David Fitzgerald)</p> <p>10. Objection to proposed cycle way through existing cul-de-sac at Ellensborough Drive. (DRAFTDEVPLAN0228, Joanne Gilson DRAFTDEVPLAN0229, Joanne Gilson DRAFTDEVPLAN0230, Joanne Gilson DRAFTDEVPLAN0231, Joanne Gilson DRAFTDEVPLAN0232, Joanne Gilson)</p> <p>11. The NTA Greater Dublin Cycle Network Plan is indicated on Map 9 as running through the Estate of Ellensborough. There is an existing route along the road up to Kiltipper Wood Centre. It would be appropriate to keep the Walk and Cycle Path on the same route.</p>	<p>the alignment of the Part 8 for the Tallaght to Ballyboden route.</p> <p><u>Ellenborough/ Kiltipper Drive & Templeroan</u> These mapped cycle route are transposed from the National Transport Authority Greater Dublin Cycle Network Plan into the Draft County Development Plan Maps and are indicated in the map legend as 'NTA Greater Dublin Cycle Network Plan'. The NTA Cycle Plan is a network plan and is shown at a wide scale. All routes and projects actioned from the Network Plan will go through a preliminary design (Part 8) and a detailed design phase prior to any construction. The design for the schemes will go through a preliminary design (Part 8) process to ascertain routing and the suggestions outlined in the submissions can be considered at that stage.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
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<p>Submission noted concerns that the provision of a cycle route to this existing estate road will encourage additional traffic on the road and any increase in traffic, either pedestrian, cycle or motor is not welcomed with children at play. (DRAFTDEVPLAN0085, Thomas O'Neill DRAFTDEVPLAN0327, Martin Skerritt)</p> <p>12. Submission requests explanation of the impact and work involved in the proposed cycle path through Ellensborough Drive. (DRAFTDEVPLAN0087, Angela Wall)</p> <p>13. Objects to the cul de sac at the top of Ellensborough drive been opened as an entrance into the Field / park it borders. Opening the cul de sac was a priority in the purchase of our house and the opening of the cul de sac will presents problems of theft, intimidation and an increase in traffic volume and parking. (DRAFTDEVPLAN0143, Elaine Fitzgerald)</p> <p>14. Concern in relation to the location/alignment of the Tallaght to Ballyboden cycle track in relation to its position relative to exiting private property in Templeroan and along Firhouse Road, including through the Monalea estate. (DRAFTDEVPLAN0273, Anne-Marie Dermody, Councillor/Solicitor)</p> <p>15. Objection to mapping of NTA Greater Dublin Cycle Network Plan through the Ellensborough and Kiltipper area. (DRAFTDEVPLAN0133, Fiona Farrell DRAFTDEVPLAN0136, Emmet Hegarty DRAFTDEVPLAN0226, Joanne Gilson)</p> <p>16. Submission is against the bicycle lanes at Ellensborough Drive (DRAFTDEVPLAN0233, Joanne Gilson)</p> <p>17. Concern in relation to the location/alignment of the Tallaght-Ballyboden cycle route in relation to its position relative to exiting private properties. Submission notes that the route indicated in teh Plan includes the</p>	
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provision of a new entrance through the boundary wall of Sally Park and along a cul-de-sac to cross Monalea Park in lieu of a route previously accepted by residents. Submission requests correction to Map 9 in this regard.

([DRAFTDEVPLAN0213, Éamonn Maloney TD](#))

18. Objection to proposed cycle way through existing cul-de-sac at Ellensborough Drive due to safety concerns and as an existing pathway is located adjacent to proposed route.

([DRAFTDEVPLAN0349, Sheila Farrell](#))

19. Request that cycle lanes be mapped along Killinenny Road on Map 9.

([DRAFTDEVPLAN0256, Mairead Flanagan](#))

20. Amend map legend to state that the NTA Greater Dublin Cycle Network is a proposed network plan.

([DRAFTDEVPLAN0335, Victorica White, Dodder Action](#))

21. Objection to the opening of Sally Park cul de sac to provide a cycle track. The submission outlines that the proposal opens the road to intruders, duplicates existing cycle tracks and questions the engineering adjustments necessary due to road levels.

([DRAFTDEVPLAN0391, Thomas Lyons](#)[DRAFTDEVPLAN0331, Orla Coakley](#) [DRAFTDEVPLAN0393, Tracy Foster](#) [DRAFTDEVPLAN0390, George Leigh](#) [DRAFTDEVPLAN0392, Tony Confrey](#)[DRAFTDEVPLAN0333, Gerry McKenna](#))

22. Submission requests that the NTA cycle route be moved generally to the southernmost boundary of the subject lands between Kiltipper Road and the Dodder River.

([DRAFTDEVPLAN0203, Eoin O Cofaigh, McHugh O Cofaigh Architects, David Kennedy](#))

SCHEDULES

SCHEDULE 1 – RECORD OF MONUMENTS & PLACES

Changes to Record of Monuments & Places	Chief Executive's Response and Recommendations
<ol style="list-style-type: none"> 1. Request to remove the Recorded Monument DU021-021 Collegeland Ringfort (Rath/Cashel) 'Site Of' from the Draft County Development Plan 2016-2022. Submission indicated that a search of the Department of the Arts, Heritage and the Gaeltacht's (DAHG) online archaeology resource (www.archaeology.ie) indicates that regard to the recorded monument (ref. DU021-021), that this feature has been classed as a 'redundant record'. (DRAFTDEVPLAN0098, Erika Casey, John Spain Associates, MLEU Dublin Limited and Mr. Charles Verschoyle Greene DRAFTDEVPLAN0346, John Spain Associates, John Spain Associates, MLEU Dublin Limited) 2. Submission on behalf of Roadstone Limited notes that there are a number of monuments in Belgard Quarry. It is submitted that there is no trace or visible sign of the tower house (DU021-02401) and that the monument and associated sites should be removed from the Record of Monuments and Places and that this should be reflected in the Development Plan. (DRAFTDEVPLAN0151, Aoife Byrne, SLR Consulting, Roadstone Limited) 3. Submission requests inclusion of The Three Ring Hill Fort (indicating a royal site) in the Record of Monuments and Places. (DRAFTDEVPLAN0170, Neville Graver, Rathcoole Community Council Limited) 	<p>Designation of Recorded Monuments</p> <p>The Record of Monuments and Places (RMP) is compiled and maintained by the National Monuments Services of the Department of Arts, Heritage and Gaeltacht (DOAHG). The DOAHG is therefore responsible for identifying and designating structures, features, objects or sites.</p> <p>It is not possible for the Planning Authority to add or remove structures to or from the RMP. The RMP for South Dublin County is listed in Schedule 1 of the Plan and identified on the Development Plan Maps for information purposes and to aid in the assessment of the potential archaeological impacts of development.</p> <p>Recommendation</p> <p>It is not recommended that the Draft County Development Plan be amended.</p>

SCHEDULE 2 – RECORD OF PROTECTED STRUCTURES (RPS)

Submission	Map No.	RPS Ref.	Response/Recommendation
Additions to RPS			
1. Welcomes the addition of further buildings to the Record of Protected Structures, and in particular, the inclusion of 196 Butterfield Avenue (Liscarney House). (DRAFTDEVPLAN0057, Paul Cleary)	Map 6	RPS 412	<p>Chief Executive's Response and Recommendation Submission noted.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
2. Property owner requests that Rathfarnham Post Office, 13 Main Street, Rathfarnham, Dublin 14 be removed from the Record of Protected Structures. The submission outlines that the property is within an existing ACA and the approach to designate as a RPS is contrary to the approach adopted in other areas of the County to exclude properties from the RPS and provide new ACAs. Submission does not consider that the inclusion is based on any adequate assessment of the property and has not been justified other than the fact that the front elevation is of aesthetic concern. (DRAFTDEVPLAN0072, Nora Bermingham)	Map 6	RPS 415-1	<p>Chief Executive's Response and Recommendation <u>Identification of Protected Structures</u> Part IV of the Planning and Development Act 2000 (as amended) and the Architectural Heritage Protection Guidelines for Planning Authorities 2004 requires every development plan to include a record of protected structures, and include in that record every structure which is, in the opinion of the planning authority, of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest. The criteria for determining the special interest of a structure are set out under the Architectural Heritage Protection Guidelines for Planning Authorities 2004.</p> <p>It is stated under the legislation that the planning authority may add a structure to its record of protected structures where the authority considers that the addition is necessary or desirable in order to protect a structure, or part of a structure, of special interest.</p> <p>As part of the review of the Draft Plan, South Dublin County Council commissioned an independent review of its Record of Protected Structures, with a view to identifying structures that merit addition or deletion including those within existing and proposed Architectural Conservation Areas. The review (entitled 'Review of Record of Protected Structures 2014/15', 2015) was carried out by a Conservation</p>

		<p>Consultant and a total of 180 structures were inspected for the purpose of this review. As part of the appraisal the special interest of each structure proposed for inclusion on the Record of Protected Structure was provided.</p> <p>A separate 'Appraisal of Candidate of Architectural Conservation Areas' (2015) was also carried out and helped to inform the Review of Protected Structures.</p> <p>Further to submissions on the Draft County Development Plan in relation to ACAs and Protected Structures, a supplementary independent assessment has been commissioned as an addendum to the initial 'Review of Record of Protected Structures 2014/15' (2015) and 'Appraisal of Candidate of Architectural Conservation Areas' (2015). The supplementary assessment will accompany any proposed material amendment(s) that go on public display following consideration of the Draft Plan and this Chief Executive's Report.</p> <p><u>Post Office, 13 Main Street, Rathfarnham</u></p> <p>The 'Review of Record of Protected Structures 2014/15' (2015) included for the assessment of a number of structures within the Rathfarnham Architectural Conservation Area (ACA) for possible inclusion in the Record of Protected Structures (RPS). This is in line with the recommendations of the Architectural Heritage Protection Guidelines for Planning Authorities 2004, which advises that individual structures within a proposed ACA that are of special importance should be considered for inclusion in the RPS, in addition to being included within a designated ACA.</p> <p>The concerns raised in the submission are noted. Based on a visual inspection, No. 13 Main Street was recommended under the independent review as being worthy of inclusion in the Record of Protected Structures in addition to its inclusion in the Rathfarnham ACA by reason of its special interest particularly in relation to its rare 1930s stained glass shop front, which has a distinctive Art Deco influence. The Council's Architectural Conservation Officer concurs with</p>
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			<p>the recommendation.</p> <p>Although 13 Main Street has not been identified under the National Inventory of Architectural Heritage, the building is considered to be of special architectural, technical and cultural interest and its identification for inclusion under the RPS is further in line with the Architectural Heritage Protection Guidelines (Section 2.5.3), which advise that it is the responsibility of planning authorities to make their own assessment of the most appropriate way to protect structures that have not been inspected by the NIAH and that, in light of the authority's own assessment of the special interest of a structure, it may be appropriate to protect the structure by inclusion in the RPS.</p> <p>It is therefore recommended that 13 Main Street be added to the Record of Protected Structures in line with the Draft Plan in order to provide for an enhanced level of protected under Planning and Development Legislation in addition to its designation within an ACA.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>3. Representation on behalf of religious society objects to the addition of the Quaker meeting housing, 62 Crannagh Road, Rathfarnham (Map Ref. 417) to the RPS on the basis that the building is not considered to be of any particular merit that would warrant protection; the construction of the building at a time when energy use was less of an issue; the likely need to carry out extensive works to the building and the potential of protected structure status and associated restrictions to hamper upgrading and future use of the premises. (DRAFTDEVPLAN0167, Rob Goodbody, Historic</p>	Map 6	RPS 417	<p>Chief Executive's Response and Recommendation See response to Item 2 above in relation to the Identify Protected Structures.</p> <p><u>62 Crannagh Road</u> Further to the response to Item 2 above, The Quaker Meeting House, No. 62 Crannagh Road, Rathfarnham was included in the independent 'Review of Record of Protected Structures 2014/15' (2015), which was carried out by a Conservation Consultant</p> <p>No. 62 Crannagh Road is identified under the National Inventory of Architectural Heritage (NIAH) under Reg. No. 11211002 and has been given a Regional Rating with its special interest categorised as being of</p>

Building Consultants, Rathfarnham Meeting of the Religious Society of Friends in Ireland)			<p>Architectural, Social and Technical interest.</p> <p>The NIAH appraisal and recommendation states that the structure is “a fine example of mid twentieth-century functional design and planning, retaining the original materials which give the group visual unity and charm” as well as forming “an important element of the local social fabric”. This equates to a recommendation for inclusion in the Record of Protected Structures by the Minister for the Arts, Heritage and the Gaeltacht.</p> <p>Based on a visual inspection and the information contained within the NIAH, the Review of Protected Structures has also recommended that the building is worthy of inclusion in the Record of Protected Structures by reason of its Architectural, Social and Technical interest.</p> <p>The Councils Architectural Conservation Officer concurs with both assessments of the structure with regard to its architectural merit and special interests. The concerns raised in the submission are fully appreciated, however, allowing the Quaker Meeting Hall to become a Protected Structure will not seriously hamper any efforts to carry out energy upgrading works, which can be accommodated within the building without directly impacting on the architectural integrity of the structure.</p> <p>The Planning and Development Act 2000 (as amended) includes requirements to respect the liturgical requirements associated with a Protected Structure that is used as a place of public worship when dealing with declarations and planning applications. The Architectural Heritage Protection for Places of Public Worship Guidelines for Local Authorities 2003 were published as a practical guide to the provisions of Part IV of the Planning and Development Act 2000 (as amended) in relation to protected structures that are regularly used as places of public worship. These provisions help to ensure that designation of the 62 Crannagh Road as a Protected Structure will not impose serious implications for the future of the building or its use as a place of public worship.</p>
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<p>4. Proposal to add Carthy's Castle, Mountpelier to the RPS by reason of its status as a significance feature in landscape, association with other historic structures and inclusion on RMP. (DRAFTDEVPLAN0210, Pádraig MacOitir, South Dublin Conservation Society)</p>	Map 9	N/A	<p>Chief Executive's Response and Recommendation</p> <p>See response to Item 2 above in relation to the Identification of Protected Structures.</p> <p><u>Carthy's Castle/Montpelier House</u> Further to the response to Item 2 above, the subject structure was included in the independent 'Review of Record of Protected Structures 2014/15' (2015).</p> <p>From an analysis of historic mapping it appears that 'Carthy's Castle' comprises the ruins of the corner section of a former house (Montpelier House) that has long been demolished.</p> <p>The remaining structure is not recorded in the National Inventory of Architectural Heritage (Department of Arts, Heritage and the Gaeltacht) and is also not listed as a Recorded Monument under the Record of Monuments and Places, which is maintained by the National Monuments Service and largely relates to archaeological sites dating to before 1700.</p> <p>Under the Planning development Act 2000 (as amended), a structure can only be designated as a protected structure where it is, in the</p>

			<p>opinion of the planning authority, of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest. The Architectural Heritage Protection Guidelines for Planning Authorities 2004 also advise that it is only considered appropriate to give protection through the RPS to structures that may be subject to re-use. The criteria for determining the special interest of a structure are also set out under the guidelines.</p> <p>It is considered that the remaining ruinous section of the former Mountpelier House is extremely unlikely to be re-used and is not of sufficient interest to merit designation as a Protected Structure when assessed against the requirements of the Planning and Development Act 2000 (as amended) and the recommendations of the Architectural Heritage Protection Guidelines.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>5. Proposal to add Woodtown Cottage - Mount Venus Road to RPS by reason of its uniqueness. (DRAFTDEVPLAN0210, Pádraig MacOitir, South Dublin Conservation Society)</p>	Map 10	N/A	<p>Chief Executive's Response and Recommendation See response to Item 2 above in relation to the Identification of Protected Structures.</p> <p><u>Woodtown Cottages</u> Further to submissions on the Draft County Development Plan in relation to ACAs and Protected Structures, a supplementary independent assessment has been commissioned as an addendum to the initial 'Review of Record of Protected Structures 2014/15' (2015) and 'Appraisal of Candidate of Architectural Conservation Areas' (2015). The supplementary assessment includes a review of the suggested addition of Woodtown Cottages to the Record of Protected Structures (RPS). The cottages comprise pairs of early twentieth century semi-detached cottages.</p> <p>The supplementary assessment, which was carried out by a</p>

			<p>Conservation Consultant advises that Woodtown Cottages do not present a strong/coherent architectural elevation or expression and there is little or no innovation design or material utilised in the construction of the buildings. Furthermore, the cottages have modernised and extended to varying degrees and are not recorded in the National Inventory of Architectural Heritage (Department of Arts, Heritage and the Gaeltacht).</p> <p>It is therefore considered that Woodtown Cottages are not of sufficient interest to merit designation as a Protected Structure or within an Architectural Conservation Area when assessed against the requirements of the Planning and Development Legislation and the recommendations of the Architectural Heritage Protection Guidelines.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>6. Request addition of Boden Village Cottages, located on Taylor's Lane, to RPS. (DRAFTDEVPLAN0383, Angela O'Donoghue, Glendoher & District Residents Association DRAFTDEVPLAN0384, Angela O'Donoghue, Rathfarnham Area Residents Association)</p>	MAP 10	N/A	<p>Chief Executive's Response and Recommendation</p> <p>See response to Item 2 above in relation to the Identification of Protected Structures.</p> <p><u>Boden Village Cottages</u> Further to the submissions on the Draft County Development Plan in relation to ACAs and Protected Structures, a supplementary independent assessment has been commissioned as an addendum to the 'Review of Record of Record of Protected Structures 2014/15' (2015) and 'Appraisal of Candidate of Architectural Conservation Areas' (2015). The supplementary assessment includes a review of the suggested addition of Boden Village Cottages to the Record of Protected Structures (RPS). The cottages comprise a terrace of mid twentieth century single story houses.</p> <p>The supplementary assessment, which was carried out by a</p>

			<p>Conservation Consultant, advises that the terrace is very carefully planned and orchestrated within one continuous plane of front roof pitch even though individual houses are staggered. The assessment notes that individual buildings are relatively plain and modest yet have quality and charm. It is advised that the significance of the terrace is derived from the whole rather than the individual units and merits designations within an Architectural Conservation Area that would aim to protect the terrace's character, external form, roof materials and relationship to the street.</p> <p>ACA designation will afford statutory protection to the special interest of Boden Village Cottages under Planning and Development Legislation, namely the external appearance and coherent visual setting created by these structures and negates the need for inclusion in the RPS. ACA designation will provide flexibility for residents to carry out internal improvements and renovation without the need to apply for planning permission. This is considered to be appropriate in the context that their special interest relates to their external coherent appearance.</p> <p>This approach is in line with the recommendations of the Architectural Heritage Protection Guidelines for Planning Authorities 2004, which recommends that ACA designation should be used to protect the setting and exterior appearance of structures that are of special interest where their interiors do not merit protection;</p> <p>It is therefore considered that the designation of Boden Village Cottages as Protected Structures would be inappropriate and that designation within an ACA would provides for a more appropriate level of protection.</p> <p>Recommendation It is recommended that the Draft County Development Plan be amended to designate Boden Village Cottages within an ACA, and amend Draft Plan Maps and Table 9.1 accordingly.</p>
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<p>7. Proposal to add St James, Knocklyon Road to the RPS. (DRAFTDEVPLAN0383, Angela O'Donoghue, Glendoher & District Residents Association)</p>	<p>10</p>	<p>N/A</p>	<p>Chief Executive's Response and Recommendation See response to Item 2 above in relation to the Identify Protected Structures.</p> <p><u>Saint James'</u> Further to submissions on the Draft County Development Plan in relation to ACAs and Protected Structures, a supplementary independent assessment has been commissioned as an addendum to the initial 'Review of Record of Protected Structures 2014/15' (2015) and 'Appraisal of Candidate of Architectural Conservation Areas' (2015).</p> <p>Saint James Cottage is not listed under the NIAH. The supplementary assessment, which was carried out by a Conservation Consultant, includes a review of St. James' and advises that the house is not considered to be of special architectural heritage value and does not display any degree of architectural sophistication.</p> <p>When assessed against the requirements of the Planning and Development Act 2000 (as amended) and the recommendations of the Architectural Heritage Protection Guidelines, it is therefore not considered necessary or appropriate to add Saint James' to the Record of Protected Structures.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>8. Submission challenges the proposal to include No 196, Butterfield Avenue, Rathfarnham, Dublin 14, on the Record of Protected Structures. The submission outlines that John Cronin and associates did not inspect the interior and outlines that the house has little value or significance architecturally or historically.</p>	<p>10</p>	<p>RPS 412</p>	<p>Chief Executive's Response and Recommendation See response to Item 2 above in relation to the Identification of Protected Structures.</p> <p><u>No 196, Butterfield Avenue</u> Further to the response to Item 2 above, No. 196 Butterfield Avenue was included in the independent 'Review of Record of Protected</p>

<p>(DRAFTDEVPLAN0173, David Slattery, David Slattery Conservation Architects Limited, Ursula & Natasha Kenny)</p>		<p>Structures 2014/15' (2015). It is stated under the appraisal that the simple classical proportions of the house are interesting but it is not a building of special or outstanding architectural or historic significance. It is considered by the Councils Architectural Conservation Officer, however, that the building is a critical focal point and contributes to the general character of the area.</p> <p>It is also considered that the existing building sets the street line for the adjacent later structures illustrating that cognisance was given to the house during the design and construction of residential development along Butterfield Avenue. It is therefore considered that 196 Butterfield Avenue is of local architectural interest and adds to the architectural rich building stock of Butterfield Avenue and the variation along the streetscape.</p> <p>The designation of No. 196 Butterfield Avenue as a Protected Structure is therefore in keeping with the recommendations of Section 2.5.7 (Architectural Interest) of the Architectural Heritage Protection Guidelines, which states that "the characteristics of architectural interest may be attributed to a structure or part of a structure with such qualities as the following: ... (d) a structure which makes a positive contribution to its setting, such as a streetscape or a group of structures in an urban area, or the landscape in a rural area."</p> <p>No 196, Butterfield Avenue is therefore considered to be of significant architectural interest and merits designation as a Protected Structure in accordance with the requirements of the Planning and Development Act 2000 (as amended) and the recommendations of the Architectural Heritage Protection Guidelines.</p> <p>It is therefore considered that the decision to recommend No 196 Butterfield Avenue as a proposed Protected Structure under the Draft County Development Plan has been justified for the reasons provided above and should therefore be included in the RPS as proposed under the Draft Plan to provide for an appropriate level of protection for the building.</p>
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			Recommendation It is not recommended that the Draft County Development Plan be amended.
9. Request to remove The Farmhouse, Saggart [Ref 331] from the RPS. (DRAFTDEVPLAN0199, John O'Malley, Kiaran O'Malley & Co. Ltd., John & Phil Kelly)	Map 8	RPS 331	Chief Executive's Response and Recommendation See response to Item 2 above in relation to the Identification of Protected Structures. <u>The Farmhouse, Saggart</u> Further to the response to Item 2 above, the existing Farmhouse, which is located along Castle Road in Saggart Village, has been long established as Protected Structure and was included as a Listed Building under the South Dublin County Council Development Plan, 1998. The Farmhouse (also known as Tri Ceidi House) is included in the National Inventory of Architectural Heritage (NIAH, 2002) under Reg. No. 11213035 and has been given a Regional Rating with its special interest categorised as being of Architectural and Technical Interest. The building is described under the NIAH as a "fine example of Victorian architecture" that makes a "valuable part of the village due to its strong contribution to the streetscape" with "skilful use of materials". Under the Architectural Heritage Protection Guidelines for Planning Authorities 2004, deletion of a structure from the Record of Protected Structures will only take place where a planning authority considers that the protection of a structure, or part of a structure, is no longer warranted or has lost its special interest value. It is considered that the existing Farmhouse continues to warrant protection and although is currently vacant the structure still retains its special Architectural and Technical Interest, therefore necessitating its continued inclusion on the Record of Protected Structures. Recommendation

			It is not recommended that the Draft County Development Plan be amended.
10. Submission on behalf of owner of 291 Templeogue Road objects to the inclusion of the building in the RPS by reason of the building being of local importance and modest architectural value, the lack of original joinery, decorative features or windows and the prohibitive costs associated with inclusion in the RPS particularly in relation to required roofing repairs. (DRAFTDEVPLAN0339, Michael O'Shea, JJM Holdings Limited)	8	RPS 418	<p>Chief Executive's Response and Recommendation</p> <p>See response to Item 2 above in relation to the Identification of Protected Structures.</p> <p><u>291 Templeogue Road</u></p> <p>Further to the response to Item 2 above, No. 291 Templeogue Road was assessed by a Conservation Consultant under the independent 'Review of Record of Protected Structures 2014/15' (2015). In the appraisal provided it is stated that the building is worthy of inclusion in the Record of Protected Structures (RPS) as it is the only surviving 19th Century buildings in Templeogue Village and is of Architectural Significance.</p> <p>The Council's Architectural Conservation Officer would consider this structure to be of modest architectural significance but would consider the building to be of local interest and significance due to it being the last surviving 19th Century structure along the main street of the village. The structure is also considered to contribute to the existing streetscape providing a level of architectural interest and historic character.</p> <p>Under Section 2.5.7 (Architectural Interest) of the Architectural Heritage Protection Guidelines for Planning Authorities 2004, it is stated that "the characteristics of architectural interest may be attributed to a structure or part of a structure with such qualities as the following: ... (d) a structure which makes a positive contribution to its setting, such as a streetscape or a group of structures in an urban area, or the landscape in a rural area."</p> <p>In the submission provided by Paul Arnold Architect it states that "as the building is of modest architectural value, it would seem that the proposal for its inclusion on the RPS arises from the age of the building</p>

			<p>and its rarity within the village as an old building fronting onto Templeogue Road, all other buildings of comparable date having been demolished. The building would be rated of Local Importance or record only under the NIAH grading”.</p> <p>The considerations provided by Paul Arnold Architects are correct, however, it should be noted that the Architectural Heritage Protection Guidelines (Section 2.5.3) state that it is the responsibility of the Planning Authority to make their own assessment of the most appropriate way to protect structures that have not been inspected by the NIAH or those given a rating of local importance.</p> <p>It is therefore considered that the decision to recommend No. 291 Templeogue Road as a proposed Protected Structure under the Draft County Development Plan has been justified for the reasons provided above and should therefore be included in the RPS as proposed under the Draft Plan.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>11. Request to remove The Merry Ploughboy, Edmondstown Road, Dublin 16 [Ref 426] from the RPS on the basis that the original building have been altered, extended and refurbished over time, with extensive internal remodelling works also carried out to date. (DRAFTDEVPLAN0171, Rob Goodbody, Historic Building Consultants, Owners of the Merry Ploughboy, Edmondstown Road)</p>	Map 10	RPS 426	<p>Chief Executive’s Response and Recommendation See response to Item 2 above in relation to the Identification of Protected Structures.</p> <p><u>The Merry Ploughboy/Doherty’s Public House</u> Further to the response to Item 2 above, The Merry Ploughboy/Doherty’s Public House, Edmondstown Road, Dublin 16 was included in the independent ‘Review of Record of Protected Structures 2014/15’ (2015), which was carried out by a Conservation Consultant.</p> <p>Doherty’s Public House is identified under the National Inventory of Architectural Heritage (NIAH) under Reg. No. 11221022 and has been given a Regional Rating with its special interest categorised as being of</p>

			<p>Architectural and Social Interest.</p> <p>The NIAH appraisal and recommendation states that the structure is a “modest two-storey public house, retaining some original fabric, the simple proportions of which subtly enhance this busy country road.” This equates to a recommendation for inclusion in the Record of Protected Structures by the Minister for the Arts, Heritage and the Gaeltacht.</p> <p>Based on a visual inspection and the information contained within the NIAH, the Review of Protected Structures has also recommended that the building is worthy of inclusion in the Record of Protected Structures as the structure provides an important element of the local social fabric and represents a local landmark.</p> <p>The Councils Architectural Conservation Officer concurs with both assessments of the structure adding that the structures location, setting and external appearance of the principal façade along the road is of local importance and should therefore be an addition to the Record of Protected Structures. It should be noted that in assessing any proposals for development the owner may request a Section 57 Declaration to ascertain what works would or would not require planning permission. The original built fabric and the significant alterations to the rear and the interior of the structure would be identified during any assessment for proposed works/development to the structure and site.</p> <p>It is therefore considered that the decision to recommend The Merry Ploughboy/Doherty’s Public House as a proposed Protected Structure under the Draft County Development Plan has been justified for the reasons provided above and should therefore be included in the RPS as proposed under the Draft Plan in order to provide for an appropriate level of protection for the building.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be</p>
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			amended.
<p>12. Submission requests inclusion of the following, located in Rathcoole, in the RPS:</p> <ul style="list-style-type: none"> - cottages opposite Rathcoole House; - Rathcoole House; - The Glebe (now fire damaged); - the 3 bay 2 storey terrace beside Scoil Chronain; - the cottages beside Scoil Chronain; and - the 2 storey house opposite the Garda station. <p>(DRAFTDEVPLAN0170, Neville Graver, Rathcoole Community Council Limited)</p>	Map 8	RPS 305, 312, 313, 329	<p>Chief Executive's Response and Recommendation</p> <p>See response to Item 2 above in relation to the Identify Protected Structures.</p> <p><u>Current RPS</u> The following houses along Main Street Rathcoole are already listed for protection under the Council's Record of Protected Structures (RPS):</p> <ul style="list-style-type: none"> - Rathcoole House (RPS REF 305) - Semi Detached Three Bay Single Storey House – beside Scoil Chronain (RPS REF 312) - Rectory/Glebe House (RPS REF 313) - Semi Detached Three Bay Single Storey House - beside Scoil Chronain (RPS REF 329) <p><u>RPS Review and Other Structures</u> Further to the response to Item 2 above South Dublin County Council commissioned an independent review of its Record of Protected Structures, with a view to identifying structures that merit addition or deletion.</p> <p>The review (entitled 'Review of Record of Protected Structures 2014/15', 2015) was carried out by a Conservation Consultant and a total of 180 structures were inspected. This included the assessment of 5 structures for possible additional designation along Main Street Rathcoole and the following three structures were included:</p> <ul style="list-style-type: none"> - End of terrace, two bay two storey house – beside Scoil Chronain (NIAH Ref 11213019) - Mid terrace, two bay two storey house – beside Scoil Chronain (NIAH Ref 11213020) - End of terrace, two bay two storey house – beside Scoil Chronain (NIAH Ref 11213020)

			<p>The independent review considered that the above 3 structures are not of sufficient interest to merit designation as Protected Structures and that designation within an Architectural Conservation Area would be more appropriate. The Council's Conservation Officer concurs with these findings.</p> <p>The two storey semi-detached and detached houses located opposite Rathcoole House and the two storey house opposite the Garda Station are not listed in the NIAH and are also not considered to be of sufficient interest to merit designation as protected structures.</p> <p>The semi-detached three Bay Single Storey House that adjoins that listed under RPS REF 329 beside Scoil Chronain has been inspected by the Council's Conservation Officer. It is considered to have been modified substantially to a point that it is no longer considered to be of sufficient interest to merit designation under the RPS.</p> <p>The structures listed in the submission have therefore either :</p> <ul style="list-style-type: none"> - already been designated as Protected Structures; or - have been assessed independently or previously for designation as proposed Protected Structures; or - are not listed under the NIAH and not considered of sufficient interest to merit designation when assessed against the requirements of the Planning and Development Legislation and the recommendations of the Architectural Heritage Protection Guidelines. <p><u>ACA Designation</u> Rathcoole is listed and mapped as a proposed Architectural Conservation Area (ACA) under the Draft County Development Plan, which centres on the Main Street of Rathcoole Village. This designation augments the designation of the Protected Structures within Rathcoole.</p> <p>This designation has been informed by the "Appraisal Candidate Architectural Conservation Areas" (2015), which was carried out as an independent assessment of groups of structures of special interest</p>
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			<p>within the County as part of the County Development Plan Review and informed the 'Review of Record of Protected Structures 2014/15'.</p> <p>The ACA Appraisal advises that ACA designation will provide a more appropriate level of protection for terraces or groupings of dwellings that were designed and built as distinct entities such as those within Rathcoole Village. This reflects the recommendations of the Architectural Heritage Protection Guidelines.</p> <p>The Draft Plan includes policy (HCL Policy 4 Architectural Conservation Areas) to preserve and enhance the historic character and visual setting of ACAs such as Rathcoole and to carefully consider any proposals for development that would affect their special value. This is supported by Draft Plan Objectives (HCL 4 Objectives 1 and 5) that seek to avoid the removal of structures and distinctive features that positively contribute to the character of Architectural Conservation Areas and to support public realm improvements.</p> <p>It is considered that the ACA and RPS designations together with the Development Plan Policy and objectives are sufficient to ensure the protection of the historic fabric and morphology of Rathcoole Village.</p> <p>It is therefore considered designation of Rathcoole within an ACA provides for a more appropriate level of protection compared to the designation of additional protected structure that are not considered to be of sufficient interest.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
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Submission	Map No.	RPS Ref.	Response/Recommendation
Removal from RPS			
1. Agrees with removal of groups of cottages such as St. Patrick's Cottages at Rathfarnham and Whitechurch Cottages from the Record of Protected Structures, and to designate them as Architectural Conservation Areas. (DRAFTDEVPLAN0057, Paul Cleary)	Map 10	RPS 255, 259, 263	<p>Chief Executive's Response and Recommendation Submission noted.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
2. Submission on behalf of Weirview Residents Association objects to the proposed removal of Weirview Cottages from the RPS on the basis of their historic and cultural importance and previous enforcement issues. (DRAFTDEVPLAN0182, John Mooney William Stapleton, Linda Harte, Paul Lynam, Weirview Residents Association, Weirview Residents Association)	Map 1	RPS 020	<p>Chief Executive's Response and Recommendation The proposed removal of Weirview Cottages from the Record of Protected Structures (RPS) and inclusion within an extended Architectural Conservation Area (ACA) for Lucan was addressed under Motion No. 306 of the June 2015 County Development Plan Meeting.</p> <p>The proposed ACA designation and RPS removal has been informed by the 'Appraisal of Candidate Architectural Conservation Areas' (2015), which was carried out as an independent assessment of groups of structures of special interest within the County as part of the County Development Plan Review. This informed the 'Review of Record of Protected Structures 2014/15' (2015).</p> <p>The ACA Appraisal advises that ACA designation will provide a more appropriate level of protection for terraces or groupings of dwellings that were designed and built as distinct entities. It is further advised that where such terraces are designated as protected structures (such as Weirview Cottages), these should be removed from the RPS in recognition of the nature of their special visual interest or value and the appropriate level of protection that will be provided under ACA designation.</p> <p>This approach is in line with the recommendations of the Architectural Heritage Protection Guidelines for Planning Authorities 2004, which recommends that ACA designation should be used to protect the</p>

			<p>setting and exterior appearance of structures that are of special interest where their interiors do not merit protection and that deletions from an RPS will take place where it has been decided that a more appropriate method of protection is through inclusion within an ACA.</p> <p>ACA designation will continue to afford statutory protection to the special interest of Weirview Cottages under Planning and Development Legislation, namely the external appearance and coherent visual setting created by these structures and negates the need for inclusion in the RPS.</p> <p>Removal from the RPS will provide flexibility for residents to carry out internal improvements and renovation without the need to apply for planning permission. This is considered to be appropriate in the context that Weirview Cottages consists of vernacular workers cottages where their special interest lies in their external appearance and not to their interiors.</p> <p>The retention of Weirview Cottages within the RPS would also be inconsistent with the proposed removal of Millbank Cottages from the RPS, which are located in the same proposed ACA extension area.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>3. Objection to:</p> <ul style="list-style-type: none"> - Removal of RPS Ref 336 (Forest Hills Font) by reason of its RMP designation. - Removal of RPS Ref 401 (Glassavullaun Cottage) by reason of the importance, rarity, vernacular design and likely age of the cottage. - Removal of RPS Ref 337 (Mill Pond and Aqueducts, Saggart) by reason of inclusion of structures in the same complex in the RPS and 	Maps 8 & 11	RPS 336, 336. 337 and 401	<p>Chief Executive's Response and Recommendation <u>RPS Review</u> Part IV of the Planning and Development Act 2000 (as amended) and the Architectural Heritage Protection Guidelines for Planning Authorities 2004 requires every development plan to include a record of protected structures, and include in that record every structure which is, in the opinion of the planning authority, of special interest.</p> <p>As part of the review of the Draft Plan, South Dublin County Council</p>

<p>detraction from historic setting. ((DRAFTDEVPLAN0210, Pádraig MacOitir, South Dublin Conservation Society)</p>		<p>commissioned an independent review of its Record of Protected Structures (RPS), with a view to identifying structures that merit addition or deletion including those within existing and proposed Architectural Conservation Areas. The review (entitled 'Review of Record of Protected Structures 2014/15', 2015) was carried out by a Conservation Consultant and a total of 180 structures were inspected for the purpose of this review and a number of deletions from the RPS have been subsequently been proposed under the Draft Plan.</p> <p><u>Structures/Objects Inspected</u> The structures/objects inspected under the RPS Review included the Forest Hills Font, Glassavullaun Cottage and the Saggart Mill Pond and Aqueducts. The justification for the removal of these three structures/groups of structures from the Record of Protected Structures (RPS) are in line with the Architectural Heritage Protection Guidelines for Planning Authorities 2004, which recommends that deletions will take place where the planning authority considers that the protection is no longer warranted and that this will generally take place when a structure has lost its special interest value.</p> <p><u>Forest Hills Font – RPS Ref 336</u> The Forest Hills Font is listed and identified under the Record of Monuments and Places (RMP) under Reference DU021-031 with an associated Area of Archaeological Potential. The RMP is compiled by the National Monuments Services of the Department of Arts, Heritage and Gaeltacht and affords protection to the object under National Monuments Legislation. This is supported by HCL2 Objective 3 of the Draft Plan, which seeks to protect and enhance sites listed in the RMP and ensure that development is managed and designed appropriately.</p> <p>It is noted that certain structures may be designated as both a Protected Structure and a Recorded Monument. Further to the 'Review of Record of Protected Structures 2014/15' (2015), it is considered that the Forest Hills Font is of some archaeological significant and, given that the font has been moved from its original location and is located within a modern housing estate, the context for the font has radically</p>
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		<p>changed and it is not considered appropriate to retain its designation as a Protected Structure. The structure has not been listed under the National Inventory of Architectural Heritage.</p> <p>Designation of the Font solely under the RMP is therefore considered to be the appropriate and sufficient mechanism of protecting the object's remaining archaeological interest. It is therefore considered that the decision to recommend the removal of the object from the RPS under the Draft Plan is justified.</p> <p><u>Glassavullaun Cottage - RPS Ref 401</u> Further to the 'Review of Record of Protected Structures 2014/15' (2015), Glassavullaun Cottage is considered to be of some social/historic interest but not of special architectural interest and is unoccupied. It is also noted that there other similar structures in the vicinity of the cottage are not listed under the RPS.</p> <p><u>Mill Pond and Aqueducts, Saggart</u> It is noted that the Mill Pond and Aqueducts were identified under the NIAH under Reg. No. 11213039 and were given a Regional Rating with its special interest categorised as being of Historical and Technical interest.</p> <p>Further to the 'Review of Record of Protected Structures 2014/15' (2015), it is advised that the Mill Pond and Aqueducts are in ruinous condition, have become heavily overgrown and are in a poor fragmentary state. Furthermore, the industrial complex that the mill pond supplied has been demolished.</p> <p>It is therefore considered that the Mill Pond and Aqueducts have lost their special interest value and that protection under the RPS is no longer warranted. It is therefore considered that the decision to recommend the removal of the structures from the RPS under the Draft Plan is justified and appropriate.</p> <p>Recommendation</p>
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			It is not recommended that the Draft County Development Plan be amended.
<p>4. Objection to removal of Whitechurch Cottages from RPS. (DRAFTDEVPLAN0383, Angela O'Donoghue, Glendoher & District Residents Association DRAFTDEVPLAN0384, Angela O'Donoghue, Rathfarnham Area Residents Association)</p> <p>5. Objection to removal of St Patricks Cottages from RPS. (DRAFTDEVPLAN0384, Angela O'Donoghue, Rathfarnham Area Residents Association)</p>	Map10	RPS 259 & 306	<p>Chief Executive's Response and Recommendation</p> <p>The proposed removal of Whitechurch Cottages and Saint Patrick's Cottages from the Record of Protected Structures (RPS) and inclusion within an Architectural Conservation Area (ACA) has been informed by the 'Appraisal of Candidate Architectural Conservation Areas' (2015), which was carried out as an independent assessment of groups of structures of special interest within the County as part of the County Development Plan Review. This informed the 'Review of Record of Protected Structures 2014/15' (2015).</p> <p>The ACA Appraisal advises that ACA designation will provide a more appropriate level of protection for terraces or groupings of dwellings that were designed and built as distinct entities. It is further advised that where such terraces are designated as protected structures (such as Whitechurch Cottages and Saint Patrick's Cottages), these should be removed from the RPS in recognition of the nature of their special visual interest or value and the appropriate level of protection that will be provided under ACA designation.</p> <p>This approach is in line with the recommendations of the Architectural Heritage Protection Guidelines for Planning Authorities 2004, which recommends that ACA designation should be used to protect the setting and exterior appearance of structures that are of special interest where their interiors do not merit protection and that deletions from an RPS will take place where it has been decided that a more appropriate method of protection is through inclusion within an ACA.</p> <p>ACA designation will continue to afford statutory protection to the special interest of Whitechurch Cottages and Saint Patricks Cottages under Planning and Development Legislation, namely the external appearance and coherent visual setting created by these structures and negates the need for inclusion in the RPS.</p>

			<p>Removal from the RPS will provide flexibility for residents to carry out internal improvements and renovation without the need to apply for planning permission. This is considered to be appropriate in the context that Whitechurch Cottages and Saint Patrick's Cottages comprise early twentieth century local authority and workers cottages where their special interest lies in their external appearance and not to their interiors.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>6. Objection to removal of Icehouse (Ref 090) from RPS by reason that it still exists, forms part of the Lucan Demesne Estate and is of high architectural and conservation interest. (DRAFTDEVPLAN0402, John Power DRAFTDEVPLAN0403, Beverley Power DRAFTDEVPLAN0155, Beverley Power, Old Orchard Management Company DRAFTDEVPLAN0404, Mr & Mrs Power, Members of The Board of Old Orchard Management Company)</p>	Map 1	RPS 090	<p>Chief Executive's Response and Recommendation See Item 2 above in relation to RPS Review.</p> <p><u>Icehouse</u> Further to Item 2 above, the initial RPS Review carried out with the Draft Plan included investigation into the Orchard House Ice House. The review noted that the location marked on County Development Plan maps related to an apartment complex and that no discernible trace of the Ice House could be found within the grounds. Furthermore, no reference to the presence of an icehouse could be found on historic mapping or on the NIAH. It was therefore proposed to remove the item from the RPS under the Draft Plan.</p> <p>Further to submissions on the Draft County Development Plan in relation to ACAs and Protected Structures, a supplementary independent assessment has been commissioned as an addendum to the initial 'Review of Record of Protected Structures 2014/15' (2015). The supplementary assessment includes a review of the Icehouse and further to the subject submission the structure has been located fully intact within the grounds of the Orchard Complex and the exact co-ordinates have been ascertained.</p>

			<p>It is therefore recommended that The Orchard House Icehouse should be retained in the Record of Protected Structures in order to provide for the appropriate protection under Planning and Development Legislation.</p> <p>Recommendation It is recommended that the Draft County Development Plan be amended to retain the Orchard House, Galway Road, Lucan - Icehouse (RPS Ref 90) under the Record of Protected Structures and Draft Plan Map correctly using revised co-ordinates.</p>
7. Objection to removal of Newlands Villa from RPS. (DRAFTDEVPLAN0261 , Gerard Stockil, Tallaght Community Council)	Map	RPS 174	<p>Chief Executive's Response and Recommendation See Item 2 above in relation to RPS Review.</p> <p><u>Newlands Villa</u> It is noted that Newlands Villa (RPS 174) was identified under the NIAH under Reg. No. 11209071 and was given a Regional Rating with its special interest categorised as being of Architectural interest. The building was vacant at the time of the NIAH survey</p> <p>Further to Item 2 above, the initial RPS Review carried out with the Draft Plan included investigation into Newlands Villa. The review advises that the structure has progressively deteriorated since the NIAH survey and is no longer standing and therefor merits removal from the Record of Protected Structures (RPS).</p> <p>The justification for the removal of what is left of the building from the RPS is in line with the Architectural Heritage Protection Guidelines for Planning Authorities 2004, which recommends that deletions will take place where the planning authority considers that the protection is no longer warranted and that this will generally take place when a structure has lost its special interest value.</p> <p>It is therefore considered that the decision to recommend the removal of the structure from the RPS under the Draft Plan is justified and</p>

			<p>appropriate.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
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SCHEDULE 3 – INTERIM HOUSING STRATEGY 2016-2022

8.0 Policies & Objectives under Housing Strategy	
<p>1. Provide an indication as to how the Part V percentage reduction for housing for older people will be calculated/quantified. (DRAFTDEVPLAN0076, Richard Butler, Cunnane Stratton Reynolds, Edward and Joan Fox)</p>	<p>Chief Executive's Response and Recommendations</p> <p>There is no prescribed reduction under Ministerial Guidelines or any relevant guidance documents in relation to offsetting the provision of housing for older people against the requirements under Part V of the Planning and Development Act 2000 (as amended).</p> <p>It is noted that Section 8.6 of the Housing Strategy states that where it is proposed to develop a site or portion of a site for housing for older people, that portion will generate a reduced percentage requirement in respect of social housing. It is therefore intended that the reduction in the Part V housing obligation will be calculated on a case by case basis and any reduction will be determined by the proportion of lands proposed for housing for older people.</p> <p>Further to the publication of the Urban Regeneration and Housing Act 2015, it is recommended that Section 2.1.0, Housing Policy 1, H1 Objective 2 and the Housing Strategy contained in Schedule 3 of the Draft County Development Plan should be amended to reflect the legislative changes which largely took effect on the 1st of September 2015. This includes changes to the percentage of lands that must be provided for social and affordable housing and the prescribed mechanism to fulfil the Part V obligations.</p> <p>The stated intention to carry out a review of the Interim Housing Strategy in the Draft County Development Plan is no longer necessary and should be removed from the Draft County Development Plan and a finalised Housing Strategy.</p> <p>Recommendation</p> <p>It is recommended that Section 2.1.0, Housing Policy 1, H1 Objective 2 and the Housing Strategy contained in Schedule 3 of the Draft County Development Plan be amended to reflect the recent amendments to Part V</p>

	<p>of the Planning and Development Act (as amended) including changes to the percentage of lands that must be provided for social and affordable housing and the prescribed mechanism to fulfil the Part V obligations. The Interim Housing Strategy should also be amended to a finalised Housing Strategy that reflects the changes to Part V. The stated intention to carry out a review of the Interim Housing Strategy should also be removed from the Draft County Development Plan and the finalised Housing Strategy.</p>
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ACCOMPANYING DOCUMENTS
ACCOMPANYING DOCUMENT – ENVIRONMENTAL REPORT

2.6 Strategic Environmental Objectives	
<p>1. Amend SEO, indicators and targets for biodiversity flora and fauna to clarify the word 'relevant'. SEOs should also be expanded to ensure they cover protected species.</p> <p>(DRAFTDEVPLAN0510, Simon Dolan, Department of Arts, Heritage and the Gaeltacht)</p>	<p>Chief Executives Response and Recommendation The contents of the submission are acknowledged and noted.</p> <p>Recommendation It is recommended that the Strategic Environmental Objectives, indicators and targets for Strategic Environmental Objective (SEO) B1 in the Environmental Report be amended to omit “relevant” to avoid any confusion in relation to same.</p>
3.3 Biodiversity	
<p>1. Sea could have been more robust in its assessment of the impact on biodiversity.</p> <p>(DRAFTDEVPLAN0510, Simon Dolan, Department of Arts, Heritage and the Gaeltacht)</p>	<p>Chief Executives Response and Recommendation It is acknowledged in Section 3.3.8 of the Environmental Report that a lack of Biodiversity or Habitat Plan for the County constrains assessment at local level. The Biodiversity Plan is a requirement of the Draft Plan (HCL Policy 1 Objective 2). The Biodiversity Plan is also an action of the Draft County Heritage Plan and it is intended to complete the Biodiversity plan in 2016. A Level 2 Habitat Survey was completed in 2010 with the production of a Habitat Map for the County. A number of areas within the County have Level 3 Habitat Surveys completed (carried out as part of projects/studies); however a number of gaps exist across the County which has been recognised in the ER and will be addressed as part of the Biodiversity Plan and GI Strategy.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
3.4 Landscapes/Soil	
<p>1. Amend 3.4.6 and Table 3.5 (Sites of Geological Interest) to include the full 10 CGS and change both headings to 'County Geological</p>	<p>Chief Executives Response and Recommendation The contents of the submission are acknowledged and noted.</p>

<p>Sites'.</p> <p>(DRAFTDEVPLAN0196, SARAH GATLEY, Geological Survey of Ireland (Dept.Communications, Energy & Natural Resources))</p>	<p>Recommendation</p> <p>It is recommended that Section 3.4.6 and Table 3.5 of the Environmental Report be amended to include the full list of Geological Sites and to change the heading to County GS.</p>
<p>Appendix 1 Detailed Assessment of Draft Plan Policies</p> <p>1. Assessment in Appendix 1 indicates that there may be impact on habitat connectivity, biodiversity and landscape from pedestrian and cycleways but that 'these will likely be mitigated'. It is not clear if these proposed mitigation measures have been put in the draft plan or have yet to be put in the Draft Plan. This needs to be clarified. (DRAFTDEVPLAN0510, Simon Dolan, Department of Arts, Heritage and the Gaeltacht)</p>	<p>Chief Executives Response and Recommendation</p> <p>The contents of the submission are acknowledged and noted. Section 8 of the SEA Environmental Report details the mitigation measures provided for within the Draft Plan in relation to Biodiversity, Flora and Fauna and Landscape. Further to the concerns with regards to the provision of a cycle network noted above, it is considered that an additional objective (associated with Policy TM3) should be provided in the Draft Plan.</p> <p>Recommendation</p> <p>It is recommended that an additional Objective be added to Policy TM3 of the Draft County Development Plan as follows: To ensure that all walking and cycling routes have regard to pertaining environmental conditions and sensitivities and incorporate appropriate avoidance and mitigation measures as part of any environmental assessments.</p>
<p>Appendix 2 Non Technical Summary</p> <p>Recommendation to include relevant environmental summary maps and tables, as appropriate, in the Non-Technical Summary (NTS) of the SEA Environmental Report to highlight the key environmental sensitivities / vulnerabilities in the Plan area, including a summary of the Strategic Flood Risk Assessment findings. Overview information in relation to the key Mitigation and Monitoring Measures would also be beneficial. (DRAFTDEVPLAN0052, David Galvin, Environmental Protection Agency)</p>	<p>Chief Executives Response and Recommendation</p> <p>The contents of the submission are acknowledged and noted.</p> <p>Recommendation</p> <p>It is recommended to amend the following:</p> <ul style="list-style-type: none"> ▪ Include Figure 3.18 (Environment Sensitivity Map) of the SEA Environmental Report in the Non Technical Summary of the Environmental Report. ▪ Expand Section 3.7.8.2 of the SEA Environmental Report to provide a more detailed summary of the Strategic Flood Risk Assessment (SFRA).

ACCOMPANYING DOCUMENT – SCREENING FOR APPROPRIATE ASSESSMENT

<p>4.0 Screening of Potential Impact</p> <p>1. A discussion of the proposed water abstraction from the River Shannon is recommended in relation to extra resources required for the extra population envisaged in terms of potable water etc. (DRAFTDEVPLAN0510, Simon Dolan, Department of Arts, Heritage and the Gaeltacht)</p>	<p>Chief Executives Response and Recommendation</p> <p>The Eastern and Midlands Regional Water Supply Project recently identified abstraction from the lower Shannon as the emerging preferred option. All stages of the process have been subject to environmental studies to date and the final option will adhere to the legislative requirements of the SEA, AA and EIA Directives.</p> <p>Recommendation</p> <p>Amend the Screening Report for Appropriate Assessment to include reference to the Eastern and Midlands Regional Water Supply Project and the implications of same.</p>
<p>5.0 Avoidance of Impacts</p> <p>1. Section 5.2.vi implies that appropriate assessment screening should assess impacts on the integrity of a Natura 2000 site, which was done at appropriate assessment stage thus creating confusion between appropriate assessment screening and appropriate assessment. It is also stated that the proposed bridge between Bohernabreena Road and Kiltipper Road is unlikely to have an impact on the SAC because the bridge would be downstream, however, this implies that groundwater does not play any role including springs. This needs to be clarified and, if necessary, a NIS may need to be produced.</p> <p>(DRAFTDEVPLAN0510, Simon Dolan, Department of Arts, Heritage and the Gaeltacht)</p>	<p>Chief Executives Response and Recommendation</p> <p>The contents of the submission are acknowledged and noted. The proposed bridge between Bohernabreena Road and Kiltipper is illustrated on the Draft Development Plan Maps as an indicative route only. The exact location of the proposed bridge will be determined following environmental assessment and detailed route selection and consultation. While the concerns of the impact of the proposed bridge have been noted in the report, undergoing detailed environmental assessment at project level (in accordance with the Habitats Directive) will further determine the impacts on the receiving environment. Provisions for Alternative Solutions or avoidance by abandoning the proposed project if the appropriate assessment is negative remain feasible options if the proposed bridge is included in the Draft County Development Plan.</p> <p>Recommendation</p> <p>Amend the Screening for Appropriate Assessment Report to reflect the indicative route for the proposed bridge and to clarify the impacts on groundwater and further environmental assessments.</p>

Appendix 2 Summary of Screening Process	
<p>1. Table 2.iv quotes generic conservation objectives for North and South Dublin Bay SACs. There are more detailed conservation objectives available for these sites and the AA screening should be amended. Details of designated sites and species and up to date conservation objectives can be found on www.npws.ie. (DRAFTDEVPLAN0510, Simon Dolan, Department of Arts, Heritage and the Gaeltacht)</p>	<p>Chief Executives Response and Recommendation The contents of the submission are acknowledged and noted</p> <p>Recommendation Amend Section 3.2 of the Screening for Appropriate Assessment document to include the up to date generic conservation objectives as detailed on www.npws.ie</p>

ACCOMPANYING DOCUMENT – LANDSCAPE CHARACTER ASSESSMENT OF SOUTH DUBLIN COUNTY

2 Evolution of South Dublin's Landscape	
<p>1. Submission requests the amendment of Section 2.3 of the Landscape Character Assessment to include an appropriate reference to the history of the Dominican Order in Tallaght. (DRAFTDEVPLAN0324, Raymond O'Malley, Kieran O'Malley & Co.Ltd, Dominican Community at St. Mary's Priory, Tallaght)</p>	<p>Chief Executives Response and Recommendation The contents of the submission are acknowledged and noted.</p> <p>Recommendation It is recommended to amend Section 2.3 of the Landscape Character Assessment to incorporate reference to the Dominican Order.</p>

OTHER ISSUES

Consultation	
<ol style="list-style-type: none"> 1. TII request participation and consultation in relation to the preparation of Local Area Plans and other plans, studies and projects that relate to transport and mobility. (DRAFTDEVPLAN0060, Tara Spain, Transport Infrastructure Ireland (TII) DRAFTDEVPLAN0506, Tara Spain, Bonneagar Iompair Éireann) 2. Request that the SDCC Development Plan makes meaningful provision for the Support of the community of the Balgaddy Working Together Group and residents to influence decisions that matter in our area. (DRAFTDEVPLAN0274, Lorraine Hennessy, Balgaddy Working Together Group) 3. Request from Committee of South Dublin County Sports Partnership to be included as a working group stakeholder in the development of plans regarding tourism and the development of a Green Infrastructure Network. (DRAFTDEVPLAN0169, Thomas Mc Dermott, South Dublin Co. Sports Partnership) 4. Request for Development Plan to include a commitment to enter into dialogue and partnership with community groups. (DRAFTDEVPLAN0399, John Keogh, Citywise Education) 5. Submission requests that Iarnród Éireann be notified of any changes or additions to the RPS. (DRAFTDEVPLAN0501, Brian Wylie, Iarnród Éireann) 6. Requests that the consultation with stakeholders be carried out for plans that include the development of parks at a pre Draft stage to inform the recreational needs of the communities. (DRAFTDEVPLAN0360, Jim Brogan, Jim Brogan, Dublin GAA County Board) 	<p>Chief Executive's Response and Recommendation</p> <p>The Chief Executive has carefully considered the issues raised in relation to Consultation and provides responses and recommendations under the following subheadings:</p> <ul style="list-style-type: none"> ▪ County Development Plans ▪ Local Area Plans ▪ Part 8 Developments ▪ Requests for named agencies/bodies ▪ Other Issues <p><u>County Development Plans</u></p> <p>It is noted that statutory consultees are notified of the preparation of a County Development Plan, with submissions from same, in addition to submissions from local residents, public sector agencies, non-governmental agencies, local community groups and other relevant bodies, considered as part of the preparation of the Plan.</p> <p>One submission received referred to notification of amendments to the Record of Protected Structures. In this regard, it is noted that Section 55 of the Planning and Development Act 2000 (as amended) provides for the notification of a person who is the owner or occupier of a structure proposed as an addition or deletion to the RPS, and the publication of same in at least one newspaper circulating in its functional area, in the making of a County Development Plan under Part II of the Act.</p> <p>In respect of specific requests for the County Development Plan to provide support to individual community groups or projects, it is noted that the County Development Plan is a strategic land use</p>

<p>7. Request the inclusion of provision in the Plan for the engagement of local stakeholders at the formulation and commencement stage of pitch rehabilitation programmes to ensure the needs of the end user are accommodated. (DRAFTDEVPLAN0360, Jim Brogan, Jim Brogan, Dublin GAA County Board)</p> <p>8. Submission from Dublin GAA County Board requests that the Action in Section 3.9.0 in relation to a comprehensive study of existing facilities be amended to include a reference that the study will be conducted with the engagement of the relevant stakeholders. (DRAFTDEVPLAN0360, Jim Brogan, Jim Brogan, Dublin GAA County Board)</p> <p>9. Submitted that following additional objective be added: Co-operate with various stakeholders in promoting and developing recreational potential. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p> <p>10. Request to amend text of C12 Objective 2 and Objective 12 to include reference to engagement with relevant stakeholders (DRAFTDEVPLAN0360, Jim Brogan, Jim Brogan, Dublin GAA County Board)</p> <p>11. Submission requests liaising with exiting sports clubs regarding design of new multi-purpose sports halls and playgrounds. (DRAFTDEVPLAN0259, Olag Sivanantham, Adamstown Cricket Club)</p>	<p>document and the delivery of specific elements are outside of its remit.</p> <p>Notwithstanding the above, the Chief Executive advises that the County Development Plan is subject to a public consultation process and it is in the interest of all interested bodies to participate in same.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Local Area Plans</u> With regard to Local Area Plans it is noted that Part II Chapter II of the Planning and Development Act 2000 (as amended) sets out the legislative requirements in relation to Local Area Plans, including notification of the public and statutory bodies, and consultation with statutory bodies with regard to same. Section 20 of the Act specifically notes that a planning authority shall take whatever steps it deems necessary to consult the Minister and the public prior to preparing, amending or revoking an LAP, including consultation with any local residents, public sector agencies, non-governmental agencies, local community groups and commercial and business interests in the area.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Part 8 Developments</u> Most developments carried out by a local authority itself are</p>
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	<p>subject to a public consultation process, as set out in the Planning & Development Regulations 2001 (as amended). Part 8 of the Planning and Development Regulations 2001 (as amended) makes provision for public notice of such developments (public press, site notice/s, etc.); notice to relevant bodies relating to the type of development proposed such as the Minister, the Heritage Council, An Taisce, Failte Ireland, another regional authority, Regional Fisheries Board, Waterways Ireland, IAA, TII, EPA, HSE, RPA, and Irish Water; and the availability for the inspection of documents, particulars and plans relating to the development on which observations can be made. If any submissions or observations are received, a report on same is presented to the members of the Council; this report contains a list of objector's names, a summary of their submission and the response of the Local Authority's response to same. Arising from consideration of the representations, the report sets out whether or not it is proposed to proceed as originally planned or to proceed with a modified proposal.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Requests for named agencies/bodies</u> A number of submissions received request that specific agencies/bodies be named within the body of the Draft Plan 2016-2022. In this regard, it is noted that the lists of agencies/bodies referred to under various sections of the Draft Plan are not exhaustive and do not preclude consultation with relevant stakeholders where appropriate.</p> <p>Recommendation</p>
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	<p>It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Other Issues</u> Any study of existing facilities will be carried out through the Council's Community Dept. using its knowledge of and contacts within the local community.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>Current and Proposed Plans, Projects and Designations</p>	
<ol style="list-style-type: none"> 1. Suggestions made regarding the Proposed Dodder Greenway such as inter alia the provision of pedestrian pathways and cycle tracks, facilitation of fishing, the creation of natural viewing points and water features, wild flower meadows and to include items that would encourage people to access the river for example street lighting and benches. (DRAFTDEVPLAN0027, Gary Tyrrell) 2. Provide for accessibility to proposed swimming pool in Lucan (C7 Objective 7), specifically pool access and configurations, including locating disabled car park spaces directly outside the entrance of the facility and providing dropped kerbs at all walk ways & tactile warnings to indicate crossing points. (DRAFTDEVPLAN0063, Nathalie Dowling, Lucan Autism Network DRAFTDEVPLAN0066, Nathalie Dowling, Lucan Autism Network) 3. Objection to existing zoning and development proposals under Ballycullen/Oldcourt LAP. (DRAFTDEVPLAN0140, Des Cathcart DRAFTDEVPLAN0142, Triona Cathcart DRAFTDEVPLAN0272, Tina & Mark Walsh) 	<p>Chief Executive's Response and Recommendation The Chief Executive has carefully considered the issues raised in relation to Current and Proposed Plans, Projects and Designations and provides responses and recommendations under the following subheadings:</p> <ul style="list-style-type: none"> ▪ Dodder Greenway ▪ LAPs and Other Plans ▪ Ballyboden Village Plan ▪ Strategic Development Zones (SDZs) ▪ Lucan Pool ▪ SAAO ▪ County Heritage Plan ▪ Tallaght Swiftway ▪ 12th Lock ▪ Balgaddy ▪ Other issues <p><u>Dodder Greenway</u> A number of submissions were made in relation to the Dodder Greenway, and particulars of same. In this regard, it is noted that the 'River Dodder Greenway Feasibility Study Report was</p>

<p>4. Submission from NAMA states that the key priority for the Development Plan should be to support early and consistent delivery of housing and that major residential land banks are made 'planning ready' as soon as possible through the swift production of agile and usable LAPs, which will help 'corral' external inputs. Statements contained in the Development Plan that set out to prepare Local Area Plans and an SDZ Panning Scheme for Clonburris are welcomed. (DRAFTDEVPLAN0118, Christopher McGarry, National Asset Management Agency)</p> <p>5. The requirement to provide children's play in semi-private or public spaces for development of 50 units or over is welcomed compared to the Adamstown Planning Scheme, which sets a threshold of '1 YCAP per 50 units'. It is requested that the Development Plan standard be amended to state that it will be applied to the Adamstown Planning Scheme. (DRAFTDEVPLAN0197, Stephen Little, Stephen Little & Associates, Castlethorn Construction)</p> <p>6. It is recommended by NTA that further policy be inserted that requires LAPs or Masterplans for 'REGEN' zoned lands to include for road network reviews to reflect changing nature of uses from industrial to residential. (DRAFTDEVPLAN0209, Tadhg MacNamara, National Transport Authority)</p> <p>7. Submission requests review and redress of Ballyboden Village Plan, including review of the 'Gilmore site'. (DRAFTDEVPLAN0186, Anne MoloneyDRAFTDEVPLAN0379, Anne Moloney DRAFTDEVPLAN0380, John Wills DRAFTDEVPLAN0381, Ciaran Dempsey)</p> <p>8. This submission focuses specifically on lands located at Cheeverstown, adjacent to Citywest Business Park and highlights the key opportunities that the development of these lands can bring to unlocking the economic potential of South County Dublin. The submission outlines that a review of the Fortunestown LAP is required as the landscape and biodiversity objectives in</p>	<p>published in January 2015 for the entire length of the River Dodder in collaboration with Dublin City Council and Dún Laoghaire - Rathdown County Council. Preferred route options and preliminary designs for a high quality amenity and commuter route have either been prepared or are in the process of preparation, with a public consultation process to follow accordingly.</p> <p>In addition, it is noted that the County Development Plan is a strategic land use document and the delivery of specific elements are outside of its remit.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>LAPs and Other Plans</u> A number of submissions were received with regard to existing LAPs and review of or amendments to same. Section 1.9.0 of the Draft Plan 2016-2022 specifically addresses the preparation of Local Areas Plans, Approved Plans and Studies, with LAPs also referenced in policies and objectives under a number of relevant sections in the Draft Plan. It beyond the scope of the County Development Plan, however, to amend an existing LAP. It is also noted that it is not appropriate for the County Development Plan to redefine an LAP or Masterplan for an area prior to appropriate scoping for same. The Council will continue its programme of preparing Local Area Plans and other plans and studies as appropriate, giving priority to areas that are likely to experience significant growth or regeneration, as stated under CS Policy 6 of the Draft Plan.</p> <p>A submission received also referenced the adoption of a "less rigid approach" for Local Area Plans. As noted above, Part II</p>
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<p>the LAP have implications for the viability of the development of the Cheeverstown lands and are no longer valid due to the culverting of the stream. The inclusion of objectives such as CN 4 in particular present a barrier to development and undermine the potential of the land. Request that the Development Plan review and re-prioritise these provisions contained in the LAP, considering that they are now proven to be without basis and justification. (DRAFTDEVPLAN0114, Mr. Jamie Rohan (c/o Stephen M. Purcell, Future Analytics Consulting Ltd.) Rohan Holdings Ltd. (c/o Future Analytics Consulting Ltd.), Rohan Holdings Ltd. (c/o Future Analytics Consulting Ltd.), Rohan Holdings Ltd)</p> <p>9. Prepare LAP for Balgaddy that ties future development to the enhancement of the area in terms of facilities, landscaping and amenities. (DRAFTDEVPLAN0238, Joanna Tuffy DRAFTDEVPLAN0239, Joanna Tuffy TD DRAFTDEVPLAN0240, Joanna Tuffy TD DRAFTDEVPLAN0241, Joanna Tuffy TD)</p> <p>10. Request for SLO to review Ballyboden Village Area Masterplan be included in the Plan, and that any development of same include provision of sports and recreational facilities for the community. (DRAFTDEVPLAN0383, Angela O'Donoghue, Glendoher & District Residents Association DRAFTDEVPLAN0384, Angela O'Donoghue, Rathfarnham Area Residents Association)</p> <p>11. Submission on completion of development of Adamstown SDZ lands. (DRAFTDEVPLAN0257, Sandra Keogh)</p> <p>12. Concern raised in relation to prescribed density, phasing of development and dwelling mix in the Fortunestown LAP. (DRAFTDEVPLAN0341, Eamonn Prenter, Cunnane Stratton Reynolds, Mr Alan Hanly)</p> <p>13. Review the Ballyboden Village plan and a comprehensive review of the</p>	<p>Chapter II of the Planning and Development Act 2000 (as amended) sets out the legislative requirements in relation to Local Area Plans. The Local Area Plans Guidelines for Planning Authorities 2013, issued by the Department of the Environment, Community and Local Government, are also noted. The preparation of LAPs will in accordance with said guidelines and in accordance with the statutory process prescribed in the Act.</p> <p>Regarding the submission which states that the Development Plan should be to support the early delivery of housing through Local Area Plans, it is noted that the Core Strategy has been prepared in accordance with National Guidelines and the Draft Plan sets out the delivery of a Housing Strategy supported by Local Area Plans, consistent with the Core Strategy.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Ballyboden Village Plan</u> The contents of the submission regarding the Ballyboden Village Plan are noted. In this regard it is noted that the Ballyboden Village Plan was finalised in July 2006 following comprehensive analysis of local issues and the completion of a public consultation programme. The extent and composition of lands zoned for development within the boundaries of the village plan have remained the same. The planning and development context for the Ballyboden Village Plan therefore remains unchanged, and the Plan is still considered to be relevant to the proper planning and sustainable development of the area. The review of the village plan would not, therefore, be required at this time.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
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<p>'Gilmore site' where a swimming pool was once pledged to be located. (DRAFTDEVPLAN0361, Louise Wills DRAFTDEVPLAN0329, Eoin Ryan)</p> <p>14. Review the Ballyboden Village plan and supports the need to improve community infrastructure in the area and empower residents to improve their health and wellbeing. A comprehensive review of the Gilmore site is also required as the site lies in the heart of Ballyboden and Ballyroan and would be an enormous loss to the areas as a future location for a recreational facility. (DRAFTDEVPLAN0362, Maire McGreal)</p> <p>15. Requested that SDCC provide a less rigid approach for Local Area Plans and implement a less prescriptive approach in terms of layout and phasing and take cognisance of issues which will impact on viability and deliverability. (DRAFTDEVPLAN0221, Ciara Slattery, New Generation Homes)</p> <p>16. Submission raises concerns in relation to conflict of the Draft Development Plan with the Draft 12th Lock Masterplan in terms of zoning and responses to submissions on the Draft 12th Lock Masterplan. (DRAFTDEVPLAN0405, Mr & Mrs Power)</p> <p>17. Submission from Tallaght Community Council includes requests relating to modifications and additions to the proposed River Dodder Greenway plan. (DRAFTDEVPLAN0261, Gerard Stockil, Tallaght Community Council)</p> <p>18. Submitted that a new section in the Plan be added called 'PROSPECTIVE SAAOs' with Objective to Actively propose the designation of areas within the Dublin Mountains including the Bohernabreena Reservoirs and High Amenity Area and the Liffey Valley Zones with a view to making SAAOs and seek an Order to that effect and undertake a feasibility study to report on other areas considered worthy of designation. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p>	<p><u>Strategic Development Zones (SDZs)</u> Part IX of the Planning and Development Act 2000 (as amended) sets out the legislative requirements in relation to Strategic Development Zones, with CS Policy 7 of the Draft Plan 2016-2022 stating that it is the policy of the Council to continue to implement the approved Planning Schemes for Adamstown SDZ and to secure the implementation of an approved Planning Scheme for Clonburris SDZ.</p> <p>With regard to Adamstown SDZ, the contents of the submission with regard to children's play facilities/spaces is noted. In this regard, it is noted that a decision on the Adamstown SDZ Planning Scheme was issued by An Bord Pleanála in December 2014. Table 2.15 of the Adamstown SDZ Scheme 2014, relates to guidelines for the provision of public open space by development and amenity area. It is noted that applications relating to residential developments in Adamstown will be assessed on their own merits and with regard to the phasing and infrastructural requirements of the SDZ Scheme.</p> <p><u>Lucan Pool</u> As noted in Section 3.9.0 above, the provision of a sports and leisure facility/centre for Lucan, including a swimming pool, is specifically referenced under Section 3.2.0 Table 3.1 of the Draft Plan 2016-2022 relating to Existing and Planned Community Facility Provision, and under C7 Objective 7. In addition, as noted above, the exact specifications or configuration of same is not, however, a matter for the Draft County Development Plan. Car parking standards, including those for Community uses, are detailed in Section 11.4.2 of the Draft Plan.</p> <p>Recommendation It is not recommended that the Draft County Development Plan</p>
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<p>19. Submission requests addition of text requiring the review of the County Heritage Plan and consultation with the public regarding same. (DRAFTDEVPLAN0261, Gerard Stockil, Tallaght Community Council)</p> <p>20. Promote, at national level, the adoption of a Land Use Strategy. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p> <p>21. The BWTG request that the CEO provides a copy of the report compiled by SDCC on the Balgaddy Working Together Group (April 2014) and respective correspondences, to all Elected Representatives for review and provide a detailed and adequate response to BWTG concerns relating to its contents and purpose. (DRAFTDEVPLAN0274, Lorraine Hennessy, Balgaddy Working Together Group)</p>	<p>be amended.</p> <p><u>SAAO</u> The contents of the submission with regard to prospective SAAOs is noted. In this regard it is noted that Local Authorities initially propose the site for designation, which the Minister of the Environment, Community and Local Government then approves. The proposal of certain areas, as specified in the text of the submission, is subject to a separate process and would not be appropriate to include in the Draft Plan.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>County Heritage Plan</u> The preparation and review of the County Heritage Plan comprises a separate process and is not a matter for the County Development Plan. It is noted, however, HCL Policy 1 specifically provides support the objectives and actions of the County Heritage Plan, with HCL1 Objective 2 also providing for the preparation of a County Biodiversity Plan.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Tallaght Swiftway</u> The Tallaght Swiftway project will be subject to a separate public consultation process.</p> <p>Recommendation It is not recommended that the Draft County Development Plan</p>
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	<p>be amended.</p> <p><u>12th Lock</u> HCL 11 Objective 6 of the Draft Plan 2016-2022 specifically seeks to enhance the industrial heritage and the recreational and amenity potential of the 12th Lock and pursue the protection and conservation of the rich natural, built and cultural heritage of the area including natural habitats and ecological resources along the Grand Canal and Griffeen River.</p> <p>A Draft 12th Lock Masterplan was presented to the Lucan Area Committee in January, February and March 2013 and is awaiting finalisation. The context for the Masterplan has been changed under the Draft Plan through the designation of lands on the north-eastern side of the 12th Lock under zoning objectives RES-N, which provides for the preparation of a statutory and a more comprehensive Local Area Plan. In combination with the provisions made under HCL 11 Objective, this negates the need to reinstate a requirement for a 12th Lock Plan.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Balgaddy</u> Lands in Balgaddy are already substantially developed and large scale future development is not anticipated during the lifetime of the Draft Plan 2016-2022. Within the context of the aforementioned recommendation of the Local Area Plans Guidelines for Planning Authorities 2013 (DECLG), the preparation of a Local Area Plan for Balgaddy is not considered to be warranted.</p> <p>Work on a new Clonburris Strategic Development Zone Plan for</p>
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	<p>undeveloped zoned lands to the south of Balgaddy is planned and resources will be focused in the preparation of such an SDZ in the context of major alterations to the built environment that are anticipated for that area.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Other issues</u> A number of submissions made references to other issues or reports that do not come within the scope of the County Development Plan, and are therefore not a matter for same.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>Development Contributions and Funding of Projects</p>	
<ol style="list-style-type: none"> 1. Policy should be inserted into the Development Plan that reflects the requirement under the Development Contributions Guidelines for Planning Authorities to ensure that schemes promote development of areas prioritised in core strategies. (DRAFTDEVPLAN0122, John Murphy, BMA Planning, Burris Property Company (In Receivership)) 2. Submission on behalf of landowner identifies a number of projects in and around Adamstown that are considered to have a wider regional role and function. It is requested that these be part funded by Section 48 Development Contributions. (DRAFTDEVPLAN0197, Stephen Little, Stephen Little & Associates, Castlethorn Construction) 	<p><u>Chief Executive's Response and Recommendation</u> Submission received related to Development Contributions Schemes, the inclusion of text and policies pertaining to such Schemes and the guidelines relating to same, and the funding of particular projects under Section 48 Development Contributions.</p> <p><u>Development Contributions Schemes & Funding</u> It is noted that the Ministerial Guidelines on Development Contributions relate to the preparation of Development Contribution Schemes, which is a separate function that is beyond the scope of the strategic land use and transportation functions of the County Development Plan.</p> <p>The ongoing review of the South Dublin County (Section 48) Development Contribution Scheme will assess the future</p>

<ol style="list-style-type: none"> 3. Submission by passive house supplier details costs associated with passive housing. (DRAFTDEVPLAN0269, Jeff Colley, Temple Media Ltd, trading as Passive House Plus (Eco Build & Upgrade)) 4. Submitted that the Action on page 74 be amended to add after Leader the following text 'and the imposition of a development levy to extend greenways, walking/cycling trails and loops including off-road trails, inter-county waymarked walking and cycle routes.' (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open) 5. Plan should include a Strategic Framework Section that includes reference to strive to secure the financial resources to implement the plan. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open) 	<p>infrastructure needs of the County and seek to prioritise the delivery of road and transport infrastructure; surface water drainage infrastructure; community facilities; and parks and open spaces in key growth areas in tandem with the delivery of new communities. While Section 48 Schemes will be informed by the Core Strategy of a County Development Plan, the review or identification of specific projects is not a matter for same.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>General</u> A number of submissions were received in relation to the additional text and policies regarding Development Contributions Schemes and funding, all of which were reviewed and considered; no amendments are proposed in this regard.</p> <p>A submission received regarding the construction cost of passive housing construction was also noted and considered; no amendments are proposed in this regard.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>Housing Maintenance & Allocation</p>	
<ol style="list-style-type: none"> 1. Request for objectives relating to housing allocation and maintenance issues. (DRAFTDEVPLAN0274, Lorraine Hennessy, Balgaddy Working Together Group) 2. Request for audit of accommodation needs for Owendoher Haven residents. (DRAFTDEVPLAN0383, Angela O'Donoghue, Glendoher & District Residents) 	<p>Chief Executive's Response and Recommendation A number of submissions were received in relation to housing allocation, audits and maintenance; these issue comprise operational matters and are not a matter for the County Development Plan.</p>

<p>Association)</p> <p>3. Submission from Tallaght Community Council includes request for objectives relating to apartment maintenance issues, including external finishes. (DRAFTDEVPLAN0261, Gerard Stockil, Tallaght Community Council)</p>	<p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>ITT merger</p>	
<p>1. Request to include objective under Policy C10 requiring retention of 'Tallaght' in the institutions title following the amalgamation of ITT with other institutions in the Dublin area. Submission also requests inclusion of terms 'Education City' or 'Education and Innovation City' under Policy C10, as used under TDL10 in the current Plan, and trademarking of the title 'Tallaght Education City' to promote Tallaght as a world class education environment. (DRAFTDEVPLAN0261, Gerard Stockil, Tallaght Community Council)</p>	<p>Chief Executive's Response and Recommendation The submission with regard to ITT and Policy C10 of the Draft Plan 2016-2022 is noted. The wording of the Policies and Objectives, including those detailed above, and associated text of Section 3.11.2 of the Draft Plan regarding Third Level Educational Facilities are considered adequate and appropriate with regard to same.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>Misc.</p>	
<p>1. Incomplete submission. (DRAFTDEVPLAN0041, maureen ferry)</p> <p>2. Include monitoring and implementation schedule and designate implementation officer. (DRAFTDEVPLAN0212, Doireann Ni Cheallaigh, An Taisce)</p> <p>3. Letter from school principal confirms use of Edmonstown Park and farm for school visits and highlights the amenity value that the farm offers for local schools. (DRAFTDEVPLAN0493, Gilda Sisk, Notre Dame School)</p> <p>4. Incomplete submission - addressed in DRAFTDEVPLAN 0262</p>	<p>Chief Executive's Response and Recommendation <u>Monitoring & Implementation</u> A submission received referred to the monitoring and implementation of the County Development Plan. In this regard it is noted that Section 15(2) of the Planning and Development Act 2000 (as amended) requires the Chief Executive to give a report to the Elected Members not more than two years after the making of a Development Plan, on the progress achieved in securing the objectives of the Development Plan. In addition, under Section 95(3)(a) of the Act, the Chief Executive is also required to include in his Report a review of the progress achieved in implementing the Housing Strategy.</p>

<p>(DRAFTDEVPLAN0265, Cormac Dooley, Dooley Architects)</p> <p>5. Submission raises issues in relation to CPO on Adamstown Road (R120) Improvement Scheme. (DRAFTDEVPLAN0405, Mr & Mrs Power)</p> <p>6. Submission from landowners advise that they are currently in discussions with EirGrid, whose future proposals would have a significant impact on the subject lands and their future development potential; as such, the Plan should include provision that EirGrid be required to provide a service that would follow, where possible, 'emerging' road patterns to the south and west of the subject lands as indicated in the Draft Plan to ensure maximum sustainable development can be achieved. (DRAFTDEVPLAN0275, John F. O'Connor, JFOC Design & Planning, Henry & Ted Crowley)</p> <p>7. Request that the terms of reference for 'Management Plans' for the development of playing pitches be precise in terms of drainage and goalmouth design to achieve the optimum use of the pitches and ensure the quality and high level maintenance of existing and new pitches. (DRAFTDEVPLAN0360, Jim Brogan, Jim Brogan, Dublin GAA County Board)</p> <p>8. Submission from Tallaght Community Council 'conditionally welcomes the merger of IT Tallaght, with DIT and IT Blanchardstown', subject to specified conditions. (DRAFTDEVPLAN0261, Gerard Stockil, Tallaght Community Council)</p> <p>9. Adopt Bye-laws banning the use of motor bikes and quads (except for bona fide agricultural purposes) in privately- owned areas of rough grazing (including commonage) and motorised paragliders. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p>	<p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p>Other Issues Submissions received referred to a range of other issues, including specific CPOs, specific projects of national service provider and its impact relative to a specific landholding, playing pitch design, use of parks, future ITT merger, and bye-laws. The contents of all submission were noted and considered; these issues are not a matter for the County Development Plan, and accordingly, no amendments are recommended in this regard.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
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Park & Public Realm Maintenance	Chief Executive's Response and Recommendation
<ol style="list-style-type: none"> 1. Complaint in relation to dog litter in Dodder Valley Linear Park and Old Bawn Park. (DRAFTDEVPLAN0059, Patrick Farrell) 2. Submission outlines that the trees overhanging the Lucan Road between Lucan Heights and Brookvale are on an unstable slope and at risk of toppling onto the footpath beneath. This needs detailed investigation and remediation. (DRAFTDEVPLAN0144, Kevin O'Loughlin) 3. Submission from Knocklyon Network raises concerns in relation to the control and management of litter, dog fouling and graffiti in Knocklyon. (DRAFTDEVPLAN0180, Eugene Barrett, Knocklyon Network Ltd.) 4. Include objective to co-operate with adjoining local authorities in the preparation of an Environmental Management Plan for the River Dodder and Environs. (DRAFTDEVPLAN0335, Victorica White, Dodder Action) 5. Submission requesting the improvement in the visual amenity, removal of disused containers and the expansion of a triangular area of land adjacent to Adamstown Way and stretching southwards towards a crossroads with Adamstown Avenue. (DRAFTDEVPLAN0504, Brian Mercer) 6. Request waste bins in the Glenlyon/ Glenvara environs to alleviate illegal dumping. (DRAFTDEVPLAN0263, Graham Owens, Glenlyon Residents Association) 7. Request that litter warden write to home owners in regard to dog fouling (DRAFTDEVPLAN0263, Graham Owens, Glenlyon Residents Association) 8. Request for pruning of trees and hedging in the Glenlyon area 	<p>Chief Executive's Response and Recommendation A number of submissions were received in relation to litter and parks maintenance issues.</p> <p>Section 10 of the Litter Pollution Act 1997 (as amended) requires the Council to make and implement a Litter Management Plan and provides for the prevention and control of litter pollution. In accordance with the provisions of Section 10 of the Litter Pollution Act, 1997 as amended, South Dublin County Council proposes to replace the Litter Management Plan 2011-2014; accordingly a new Draft Litter Management Plan to cover the period 2015-2019 has been prepared. The SDCC Litter Management Plan is the relevant mechanism for the implementation and management of litter issues in the County, including those references in submissions received.</p> <p>With regard to parks maintenance and management, the management and ongoing maintenance of hedgerows, trees and footpaths is part of the day-to-day operations of the South Dublin County Council. The County Development Plan is a strategic document and the delivery of specific elements such as the day to day management of Parks is outside of its remit.</p> <p>The provision of SLO/s with regard to road upgrades and parking enforcement are not a matter for the County Development Plan and is not, therefore, recommended. In addition, the specification of utility boxes is not a matter for the County Development Plan; therefore no amendments are recommended in this regard.</p> <p>The contents of the submission with regard to Adamstown Way is noted and considered; this is not a matter for the County Development Plan and may be addressed under the Planning Enforcement process.</p>

<p>(DRAFTDEVPLAN0263, Graham Owens, Glenlyon Residents Association)</p> <p>9. Concerns expressed in relation to damage to perimeter wall in Glenlyon estate. (DRAFTDEVPLAN0263, Graham Owens, Glenlyon Residents Association)</p> <p>10. Submission outlines objection to specifics works proposed for the village centre of Rathfarnham including removal of grassed area and planting and the provision of a plaza. (DRAFTDEVPLAN0328, Hester Scott)</p> <p>11. Submission from Tallaght Community Council includes requests to maintain clear views of protected structures and natural features, and the quality of watercourses in the County, through the pruning of trees, etc. Submission includes request for SLO in relation to materials to be used in upgrade of boundary treatment works along N81. Submission includes request for SLO to restrict parking on public pathways/green verges on all main roads around the County. Submission requests leveraging funds from national projects to complete a formal, stone boundary from Seskin View to Bolbrook Bridge over the lifetime of the Plan. Submission requests specifications for location of utility boxes in public areas. Submission requests mowed margin of 10 metres on each side of all main roadways around the County to be maintained. (DRAFTDEVPLAN0261, Gerard Stockil, Tallaght Community Council)</p> <p>12. Submission from Tallaght Community Council includes requests to provide facilities for dog owners to clean up after their pets. (DRAFTDEVPLAN0261, Gerard Stockil, Tallaght Community Council)</p>	<p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Other Issues</u> In relation to a range of matters raised including heritage, village plans, maintenance and management of parks, tree maintenance, private and public walks, litter and dog litter, it is noted that the County Development Plan is a strategic land use document. These detailed issues are outside the remit of the County Development Plan.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
<p>Part 8 Housing</p>	
<p>1. Objection to Part 8 Housing Proposal. (DRAFTDEVPLAN0028, Josie Flanagan, St. Marks Silver Surfers Active Retirement Group) DRAFTDEVPLAN0254, Mary</p>	<p>Chief Executive's Response and Recommendation The provision of sites for social housing is a reserved function of the Council and is generally carried out through the Part 8</p>

<p>Gaffney DRAFTDEVPLAN0488, Josie Flanagan, St.Marks Silver Surfers ARA)</p> <ol style="list-style-type: none"> 2. Objection to proposals to provide social housing on existing areas of green space, noting that such development would be contradictory to Development Plan policy regarding social housing provision and infill housing, would impact on existing services, and would negatively impact on recreational amenities and the aesthetics of an area. (DRAFTDEVPLAN0260, Maura gaffney) 3. Request for Plan to ensure development of social housing in Griffeen/Clonburris area on lands acquired from NAMA which sufficient infrastructure. (DRAFTDEVPLAN0274, Lorraine Hennessy, Balgaddy Working Together Group) 4. Request that the Plan refrain from allocating open green spaces,(ie Letts Field, Balgaddy and St Marks) in existing estates for the development of social housing. (DRAFTDEVPLAN0274, Lorraine Hennessy, Balgaddy Working Together Group) 5. Objection to the use of existing green spaces in Springfield and Tallaght for infill housing. (DRAFTDEVPLAN0288, Olive Skelly DRAFTDEVPLAN0289, Madeline & Patrick Kelly DRAFTDEVPLAN0290, Thomas Herbert DRAFTDEVPLAN0291, Etta Herbert DRAFTDEVPLAN0292, Christina Leonard DRAFTDEVPLAN0294, Evelyn Doherty DRAFTDEVPLAN0293, Mary Gaffney DRAFTDEVPLAN0282, A. Stakem DRAFTDEVPLAN0281, L. Stakem DRAFTDEVPLAN0283, Eugene DohertyDRAFTDEVPLAN0284, Margaret McNevin DRAFTDEVPLAN0285, John Leonard DRAFTDEVPLAN0286, Olive Mary Mullen DRAFTDEVPLAN0287, Patricia Skelly) 	<p>process. These Part 8 developments are subject to a separate public consultation process. The response to Part 8 submission under Consultation above is also noted in this regard.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
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6. Objection to use of exiting green spaces in Springfield Estate for infill housing by reason of
- Impact on exiting services, including sewerage and drainage,
 - Traffic congestion and parking issues,
 - Loss of open space, and resultant impact on health and wellbeing of existing residents.

- Existing mix of social and private housing in the area.

[\(DRAFTDEVPLAN0409, Gabriel Brophy DRAFTDEVPLAN0406, Andrew Lyle DRAFTDEVPLAN0407, Sandra Brophy DRAFTDEVPLAN0408, Lauren Brophy DRAFTDEVPLAN0411, Joan Fagan DRAFTDEVPLAN0412, Noel Mc Peake DRAFTDEVPLAN0413, Carmel Mc PeakeDRAFTDEVPLAN0410, Martin Costello DRAFTDEVPLAN0473, Joe Sherry DRAFTDEVPLAN0472, Michael Kavanagh DRAFTDEVPLAN0434, Paddy & Kathleen RyanDRAFTDEVPLAN0435, Grace Bracken DRAFTDEVPLAN0436, Mary Holden DRAFTDEVPLAN0437, Denise Colgan DRAFTDEVPLAN0438, Paul TarraghDRAFTDEVPLAN0439, Patrick Warren DRAFTDEVPLAN0440, Edward Kennedy DRAFTDEVPLAN0441, John Farrell DRAFTDEVPLAN0442, Anthony & Mary WillsDRAFTDEVPLAN0443, Ann Martin DRAFTDEVPLAN0464, Robert McGovern DRAFTDEVPLAN0465, Lynette McGovern DRAFTDEVPLAN0466, John WalshDRAFTDEVPLAN0467, Seamus Furney DRAFTDEVPLAN0468, John Cleaver DRAFTDEVPLAN0469, John Owens DRAFTDEVPLAN0470, Lisa McDonaldDRAFTDEVPLAN0471, Liz Moynihan DRAFTDEVPLAN0483, John P.Fagon DRAFTDEVPLAN0482, Anne Tanered Deegan DRAFTDEVPLAN0481, Raymond DeeganDRAFTDEVPLAN0480, Teresa Clancy DRAFTDEVPLAN0479, Donna Kiernan DRAFTDEVPLAN0478, Philip Molloy DRAFTDEVPLAN0477, Maureen O'LearyDRAFTDEVPLAN0476, Patricia Dolan DRAFTDEVPLAN0475, Peter Raju DRAFTDEVPLAN0474, Peter Marshall DRAFTDEVPLAN0453, Tony & Tiny NolanDRAFTDEVPLAN0452, Sean Fitzsimons DRAFTDEVPLAN0451, David Nicholson DRAFTDEVPLAN0450, Angela Smith DRAFTDEVPLAN0447, Russell McSorleyDRAFTDEVPLAN0446, Catherine Manning DRAFTDEVPLAN0419, Ed Marshall DRAFTDEVPLAN0420, Fiona](#)

<p> Coyle Saunderson DRAFTDEVPLAN0418, Shane RyanDRAFTDEVPLAN0421, Áine Coyle DRAFTDEVPLAN0422, Teresa Byrne DRAFTDEVPLAN0423, Kevin Byrne DRAFTDEVPLAN0444, Michael CreaghDRAFTDEVPLAN0448, Amanda Roche DRAFTDEVPLAN0445, Brendan O'Leary DRAFTDEVPLAN0417, Bernie Naughton DRAFTDEVPLAN0415, Geraldine CumminsDRAFTDEVPLAN0416, Karl Cummins DRAFTDEVPLAN0414, Deirdre Colgan DRAFTDEVPLAN0449, Margaret Cronin DRAFTDEVPLAN0424, Lydia SegraveDRAFTDEVPLAN0425, Patrick Segrave DRAFTDEVPLAN0426, Kevin Segrave DRAFTDEVPLAN0427, Pat Leonard DRAFTDEVPLAN0428, Janette FreemanDRAFTDEVPLAN0429, Niall Murphy DRAFTDEVPLAN0430, Anne Connolly DRAFTDEVPLAN0431, Michael Doolin DRAFTDEVPLAN0432, Noreen GillespieDRAFTDEVPLAN0433, Ann Moran DRAFTDEVPLAN0454, Edward Murphy DRAFTDEVPLAN0455, Noeleen Murphy DRAFTDEVPLAN0456, John RabbittDRAFTDEVPLAN0457, Brid Rabbitt DRAFTDEVPLAN0458, Audrey Rabbitt DRAFTDEVPLAN0459, Olive Kennedy DRAFTDEVPLAN0460, Paul KennedyDRAFTDEVPLAN0461, Frank Mulholland DRAFTDEVPLAN0462, Patricia O'Rourke DRAFTDEVPLAN0463, Anne Leonard) </p> <p>7. Submission requests inclusion of additional objectives in relation to identifying proposed locations for social housing, traveller accommodation and accommodation for refugees using Pobal maps. (DRAFTDEVPLAN0261, Gerard Stockil, Tallaght Community Council)</p>	
<p>Planning Applications, Enforcement and Site Development</p>	
<p>1. Requests a policy statement in relation to the enforcement of planning conditions (DRAFTDEVPLAN0057, Paul Cleary)</p> <p>2. Request to include specific reference to Enforcement [as under Section 0.4 General Guidance - Development Management in current Plan], and to include</p>	<p>Chief Executive's Response and Recommendation <u>Enforcement</u> A number of submissions received referred to enforcement proceedings and extensive reference to same to be included in the Draft Plan 2016-2022. In this regard, it is noted that Part VIII of the Planning and Development Act 2000 (as amended) sets out the legislative requirements for Enforcement. The issue of</p>

<p>the following additional text: 'Will be proactive with regard to enforcement and will not rely on complaints that may be received from third parties'. (DRAFTDEVPLAN0496, Patrick Leonard, An Taisce)</p> <p>3. Submission relates to five sites located at and adjacent to the Naas Road and Long Mile Road junction. Submission requests that the Plan include an objective for the Council to proactively engage in its Active Land Management role to facilitate the early development of key sites, and regeneration areas in a manner consistent with proper planning and sustainable development principles. (DRAFTDEVPLAN0081, Declan Brassil, Declan Brassil & Co., Harris Group of Naas Road)</p> <p>4. Submission includes report prepared by Stephen Reid Consulting on behalf of the Prospect Manor Residents Association in relation to development permitted on Scholarstown Road and Stocking Lane under SD15A/0017 / PL06S.244732. (DRAFTDEVPLAN0245, Mark Byrne, Prospect Manor Residents Association)</p> <p>5. Submission from landowner of lands adjacent to the Peyton housing estate in Rathcoole. The submission outlines that the builders of Peyton have left the site without completing construction and left a massive pile of subsoil adjoin the farm. Additionally, the builder has failed to build a wall as agreed and this is impacting the farm. (DRAFTDEVPLAN0385, Brendan, Seamus, Dermot & John Reilly)</p> <p>6. Include subsection in draft plan as follows: The council has extensive powers under the Planning and Development Act 2000 to take enforcement action where unauthorised development has occurred, is occurring or, where permitted, development has not, or is not being carried out, in compliance with the planning permission granted or any conditions. Planning legislation will be enforced to ensure that the environment is not jeopardised by inappropriate</p>	<p>enforcement is not addressed in Part II of the Act, which relates to the making of a County Development Plan; the inclusion of text in relation to same is not, therefore, recommended.</p> <p>A separate submission received referred to an issue concerning construction waste at a particular site; this is not a matter for the County Development Plan and may be addressed under the Planning Enforcement process.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Active Land Management</u> Active land management, to be progressed under Construction 2020 falls outside the remit of the County Development Plan, and is therefore not a matter for same. No amendments are recommended in this regard.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p> <p><u>Extant Planning Permission & Construction Works</u> A submission received included reference to a specific planning application; this is not a matter for the County Development Plan.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
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and environmentally damaging development and ensure that the policies and objectives of the Plan are implemented and adhered to. Ensure that the integrity of the Planning System is maintained and that it operates for the benefit of the whole community and that the environment is not jeopardised by inappropriate and environmentally damaging development and ensure that the policies and objectives of the Plan are implemented and adhered to. Take enforcement action in cases of unauthorised development, where it is appropriate to do so, consistent with the provisions of Part VIII of the Planning and Development Act, 2000. Under planning legislation any development which requires permission and does not have that permission is unauthorised development, as is development which has been or is being carried out in breach of conditions specified in a planning permission. In carrying out its enforcement functions, the Council will :

- 1 Issue Warning Letters, in relation to any non-minor unauthorised development of which it becomes aware, within 6 weeks;
 - 2 Carry out an investigation into alleged unauthorized development, after the issuing of a Warning Letter;
 - 3 Make a decision, as expeditiously as possible, as to whether or not to issue an Enforcement Notice. This decision to be made within 12 weeks of the issue of a Warning Letter;
 - 4 Enter any decision to issue an Enforcement Notice, including the reasons for it, in the Planning Register;
 - 5 Notify complainant(s) regarding the decision to issue an Enforcement Notice. Where the decision is not to issue an Enforcement Notice the developer and the complainant will be informed of the reason for this decision.
 - 6 May carry out periodic site visits in order to ascertain compliance
- Proceedings for non-compliance with and Enforcement Notice will be taken in the District Court in most cases. However, where appropriate, injunctions will be sought in the Circuit Court or High Court.
- In all cases involving legal proceedings the Council will seek to recover its costs, in addition to any fines imposed by the courts.

[\(DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open\)](#)

Spelling Error & Title Issue	
<ol style="list-style-type: none"> 1. Request to include specific reference to Ballyboden in the Action relating to investigating the provision of a swimming pool in the Knocklyon/Firhouse area. (DRAFTDEVPLAN0383, Angela O'Donoghue, Glendoher & District Residents Association DRAFTDEVPLAN0384, Angela O'Donoghue, Rathfarnham Area Residents Association) 2. Submission notes that Edmondstown Road is incorrectly spelled under RPS Ref 426. Submission also notes that the subject premises, while listed as Doherty's Public House, has been named The Merry Ploughboy since 2006. (DRAFTDEVPLAN0171, Rob Goodbody, Historic Building Consultants, Owners of the Merry Ploughboy, Edmondstown Road) 3. Submission received from the Department of Environment, Community and Local Government. Submission notes Table 11.21 (pg.194) details Minimum Space Standards for Apartment developments and reflects the Sustainable Urban Housing: Design Standards for New Apartments Guidelines (2007) includes a typographical error in column 2 of the table which is titled 'House' in lieu of 'Apartment'. (DRAFTDEVPLAN0183, Minister for Environment, Community & Local Government, Department of the Environment, Community & Local Government) 4. Submission requests the following in relation to visual appearance and layout: <ul style="list-style-type: none"> -Contents - Final version of the Plan to have a detailed Contents sec as in the 2010 Plan. -Index - Final version of the Plan to include an Index as in the 2010 Plan. -Suggests that the Implementation should be included at the end of each chapter or at least the policy Chapters and Chapter 11 should be cross-referenced. -Submitted that the Draft can be improved by the sub-numbering or sub-lettering lists of points and paragraphs. The present layout creates difficulties 	<p>Chief Executive's Response and Recommendation <u>RPS</u></p> <p>The contents of the submission received in relation to the spelling of Edmondstown Road under the Draft Plan 2016-2022 RPS reference 426, Doherty's Public House, was noted; amendment to the Draft Plan to correct same is recommended. The naming of this property in the RPS, also referred to in the submission received, reflects that stated in the National Inventory of Architectural Heritage (NIAH) under reference 11221022. No change is therefore recommended.</p> <p>A number of submission also made reference to the naming of sites/structures identified in the RPS of the Draft Plan. In this regard, it is noted that the description in the RPS reflects those in the National Inventory of Architectural Heritage (NIAH) and historic placenames/sites identified on historic maps. Amendments to same is not, therefore, recommended.</p> <p>Recommendation</p> <p>It is recommended that the Draft County Development Plan be amended to reflect the correct spelling of 'Edmondstown Road' under RPS Ref 426.</p> <p><u>Minimum Space Standards for Apartment</u></p> <p>The contents of the submission from the Department of Environment, Community and Local Government with regard to Table 11.21 of the Draft Plan regarding Minimum Space Standards for Apartments was noted; amendment to the Draft Plan to correct same is recommended.</p> <p>Recommendation</p> <p>It is recommended that Table 11.21 of the Draft County Development Plan regarding Minimum Space Standards for</p>

<p>when referring to particular points. -Submitted that the numbering shouldn't start again after each new Policy. See 8.1.0 for an example. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p> <p>5. Submitted that Recreation should be added to title of Section 4.5 Tourism and Leisure (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p> <p>6. Submission requests addition of 'Tallaght to the address of Whitehall' on p239 of the Plan (RPS). Submission queries whether name 'City Weir' can be used in two references, specifically noting that RPS Ref 339 is referenced as City Weir but is 'Old Bawn bridge and weir'. Submission also requests 'Page 246 - Amend 'City Watercourse' to include 'Firhouse/Balrothery Weir' also. Address townland is Tymon South'. [note: may refer to Ref 246 or RPS as opposed to p246 of the Plan]. (DRAFTDEVPLAN0261, Gerard Stockil, Tallaght Community Council)</p> <p>7. Title - Submitted that Archaeology be included in the title to more accurate reflect its Contents. (DRAFTDEVPLAN0498, Roger Garland, Keep Ireland Open)</p>	<p>Apartments be amended to state 'Apartments' in lieu of 'Houses' in the second column of the table.</p> <p><u>General</u> A number of submissions were also received in relation to the text, naming, numbering, title issues, layout and referencing of the Draft Plan, all of which have been noted and considered; no amendments are proposed in this regard.</p> <p>Recommendation It is not recommended that the Draft County Development Plan be amended.</p>
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SUMMARY OF RECOMMENDED AMENDMENTS

Chapter 1 Summary of Recommended Amendments to the Draft Plan

Section	Response Issue	Recommended Amendments
1.6.0 Housing Land Capacity	Edmondstown	Amend CS1 Objective 3 to promote pre-application consultation in accordance with Section 247 of the Planning and Development Act 2000 (as amended).
1.9.0 Local Area Plans, Approved Plan & Studies	Walkinstown - Greenhills LAP	Amend CS6 SLO 1 to ensure that the Naas Road Framework Plan (2010) is taken into consideration during the preparation of the LAP.
1.10.0 Strategic Development Zones	General	Amend Section 1.10.0 to acknowledge the planned review of the Clonburris SDZ Planning Scheme.

Chapter 2 Summary of Recommended Amendments to the Draft Plan

Section	Response Issue	Recommended Amendments
2.1.0 Housing Strategy	Edmondstown SLO	Amend H3 SLO1 (Edmondstown – former Kilmashogue House) to facilitate low density residential development at Edmondstown at a net density of not more than 12 dwellings per hectare and to promote housing for older people (nursing home, independent and semi-independent) as a fully integrated part of such development with an increased density of not more than 20 dwellings per hectare to apply to independent and semi-independent housing for older people. The SLO should state that all residential development including housing for older people shall be integrated within a sustainable residential neighbourhood that is served by shared public open space, community and local facilities. It should also be stated that permissible densities may be increased in accordance with the relevant ministerial guidelines where issues of accessibility have been fully resolved in an appropriate manner.
2.1.0 Housing Strategy	Housing Need and Part V	Amend Section 2.1.0, Housing Policy 1, H1 Objective 2 and the Housing Strategy contained in Schedule 3 of the Draft County Development Plan to reflect the recent amendments to Part V of the Planning and Development Act (as amended) including changes requiring that not more than 10% of housing should be social/affordable, and the prescribed mechanism to fulfil the Part V obligations. The Interim Housing Strategy should also be amended to a finalised Housing Strategy that reflects the changes to Part V. The stated intention to carry out a review of the

		Interim Housing Strategy should also be removed from the Draft County Development Plan.
2.3.0 Quality of Residential Development	General	Amend Policy H11 Objective 2 to promote new residential development taking account of energy efficiency and / or renewable energy opportunities including solar energy where appropriate in accordance with Part L of the building regulations.

Chapter 3 Summary of Recommended Amendments to the Draft Plan

Section	Response Issue	Recommended Amendments
3.9.0 Sports Facilities and Centres	Stadia	It is recommended that the Draft County Development Plan be amended to include the addition of 'Stadium' in the Definition of Use Classes in Schedule 5 of the Draft Plan, and the Land Use Zoning tables amended to include same where appropriate and in accordance with relevant policies and objectives of the Draft Plan.
3.11.0 Educational Facilities	Department of Education and Skills submission	It is recommended that Section 3.11.0 of the Draft County Development Plan be amended to include additional text in the narrative of Section 3.11.0.
3.12.0 Healthcare Facilities	Rosse Court Centre	Amend the County Development Plan Maps to include a Local Centre (LC) zoning at Rosse Court (see also Section 5.6.0 Retail Centres).

Chapter 4 Summary of Recommended Amendments to the Draft Plan

Section	Response Issue	Recommended Amendments
4.3.0 Employment Location Categories	ET Policy 1 Objective 6	It is recommended that ET Policy 1, Objective 6 of the Draft County Development Plan be amended to accommodate people intensive enterprise and employment uses, such as major office developments, to lands zoned 'District Centre', 'Enterprise and Employment', and 'Regeneration Zones' within 400 metres of a high frequency bus service (in accordance with NTA Draft Transport Strategy for the GDA 2016-2035) and/or within 800 metres walking distance of a Train or Luas station, the latter requiring demonstration of required walking distance or provision of a

		permeability project (in accordance with the Permeability Best Practice Guide 2013), to achieve same.
4.3.0 Tourism and Leisure	Geological Heritage	It is recommended that Section 4.5.0, ET8 Objective 2 of the Draft County Development Plan be amended to include reference to the County's geological heritage, and that the GSI be included in the list of key stakeholders in the Action relating to ET Policy 8.
4.3.0 Tourism and Leisure	ET Policy 6 – Greenways, Trails and Loops	It is recommended that Section 4.5.0, ET Policy 6 of the Draft County Development Plan be amended to include reference to blueways/water trails, to include the NTA in the list of funding agencies in the Action relating to ET Policy 6, and to include cross reference to Section 9.4.0 of the Draft Plan with regard to Rights of Way and Permissive Access Routes.
4.3.0 Tourism and Leisure	ET Policy 7 – Leisure Activities	It is recommended that Section 4.5.0, ET Policy 7 of the Draft County Development Plan be amended to include reference to canoeing/kayaking infrastructure and facilities.
4.7.0 Mineral Extraction	Mineral Extraction	<p>It is recommended that</p> <ul style="list-style-type: none"> ▪ Section 4.5.0, ET10 Objective 2 of the Draft County Development Plan be amended to include reference to resultant significant adverse effects of extraction, ▪ ET10 Objective 2 of the Draft Plan be amended to include reference to the re-use of quarries, ▪ Section 11.3.8 of the Draft Plan be amended to reflect same, and ▪ Section 11.3.8 of the Draft Plan be amended to include reference to relevant national guidance on quarries and ancillary activities.

Chapter 5 Summary of Recommended Amendments to the Draft Plan

Section	Response Issue	Recommended Amendments
5.1.0 Urban Centres	Ballycullen/ Firhouse and Balgaddy	It is recommended that the Draft County Development Plan be amended to include a Local Centre (LC) zoning at Rosse Court.

5.2.0 Retailing, 5.3.0 Additional Retail Floor Space & 5.6 Retail Centres	Firhouse, Palmerstown & Knocklyon – Level 3 Centres	It is recommended that the Retail status of Firhouse, Palmerstown and Knocklyon be reverted to Level 4 in Section 5.2.2 of the Draft County Development Plan. Retain the District Centre zoning for these centres and amend Section 5.6.2 and the land use zoning matrix accordingly to differentiate between Level 3 and Level 4 District centres.
5.2.0 Retailing, 5.3.0 Additional Retail Floor Space & 5.6 Retail Centres	Retail Terminology	Add definitions for 'Hypermarkets', 'Shop – Comparison' and 'Shop – Major Comparison' to Schedule 5 and integrate the Land Use Classes into the Zoning Tables in Chapter 11
5.2.0 Retailing, 5.3.0 Additional Retail Floor Space & 5.6 Retail Centres	Additional Retail	Minor amendment to the wording in Section 5.3 to replace the wording 'permitted' with 'capacity'.
5.2.0 Retailing, 5.3.0 Additional Retail Floor Space & 5.6 Retail Centres	Convenience Shops in Residential Areas	It is recommended that the wording in Policy R1 Objective 9 of the Draft County Development Plan be amended to the following; R1 Objective 9: To encourage and facilitate the provision of local convenience shops (Shop –Local) in existing residential areas where there is a deficiency of retail provision in the catchment, subject to protecting residential amenity.
5.2.0 Retailing, 5.3.0 Additional Retail Floor Space & 5.6 Retail Centres	Strategic Development Zones (SDZ)	Amend the wording in R6 Objective 3 to omit the terms 'high density' and 'including department stores and shopping stores'.
5.2.0 Retailing, 5.3.0 Additional Retail Floor Space & 5.6	Retail Floor Area Terminology	It is recommended that the Draft County Development Plan be amended with regard to 'net retail floorspace' in lieu of 'net retail area' in the definition of Shop-Major Sales Outlet, in the interest of consistency with the Retail Planning Guidelines.

Retail Centres		
5.2.0 Retailing, 5.3.0 Additional Retail Floor Space & 5.6 Retail Centres	Balgaddy	Amend the County Development Plan Maps to include a Local Centre (LC) zoning at Rosse Court.
5.2.0 Retailing, 5.3.0 Additional Retail Floor Space & 5.6 Retail Centres	Sequential Approach	Amend the County Development Plan to include reference to Local Centres in retail Policy 2 Objective 1.
5.7.0 Retail Warehousing & Retail Parks	Retail Warehousing	It is recommended that the following be added to Section 11.3.6(v) Retail Warehousing – Within core retail areas, the Planning Authority will apply a level of flexibility in allowing types of stores where a mix of bulky and non-bulky goods are sold.
Section 11.3.6	Off Licence	It is recommended that Section 11.3.6 of the Draft County Development Plan be amended to clarify that the provision of a small section of convenience retail for an ancillary off licences uses is generally acceptable.

Chapter 6 Summary of Recommended Amendments to the Draft Plan

Section	Response Issue	Recommended Amendments
6.1.0 Overarching Policies & Objectives	Overarching Policies & Objectives	<ul style="list-style-type: none"> That Section 6.1.0 <i>Overarching</i> of the Draft Plan be modified to clarify that sustainable modes include public transport, cycling and walking. That Section 6.1.2 <i>Integrated Transport Studies</i> of the Draft Plan be modified to make reference to some of the specific works required to improve pedestrian and cyclist mobility.
6.2.0	NTA Role	Amend section 6.2.0 <i>Public Transport</i> of the Draft County Development Plan to acknowledge the NTAs role in the provision of public transport services.
6.2.0 Public	New/Enhanced	It is recommended that Actions under (TM) Policy 2 be modified to:

Transport	Services	<ul style="list-style-type: none"> ▪ Make reference to the Core Bus Networks ▪ Omit the reference to the extension of the BRT from Tallaght to Dundrum / Sandyford. ▪ Omit the Action referring to a future public rail transport corridor between Saggart and Hazelhatch. ▪ That the word 'former' be inserted prior to any references to Metro-west.
6.3.0 Walking and Cycling	Accessibility and Links	That an action be added to (TM) Policy 3 Walking and Cycling stating that the Council will undertake a series of studies in association with the NTA and TII that seeks to address accessibility and permeability issues in the vicinity of existing and proposed major public transport services.
6.3.0 Walking and Cycling	Design of Facilities	That the Actions listed under (TM) Policy 6 Road and Street Design be amended to make reference to the National Cycle Manual.
6.3.0 Walking and Cycling	Health Benefits of Walking and Cycling	That Section 6.3.0 of the Draft County Development Plan be amended to make reference to Healthy Ireland.
6.3.0 Walking and Cycling	Walking in Rural Areas	Amend Plan by cross-referencing (TM) Policy 3 Walking and Cycling with (HCL) Policy 16 Public Rights of Way and Permissive Access Routes.
6.4.0 Road and Street Network	Strategic Road Network.	<p>Amend Table 6.5 Six Year Road Programme and Table 6.6: Medium to Long Term Road Objectives to remove the proposals for the following junctions:</p> <ul style="list-style-type: none"> • Fonthill Road/N4 • Esker Lane/N4 • Tandy's Lane/N4 • Tay Lane/N7 Junction • Junction 8 (M50) <p>and</p> <p>That the Actions of (TM) Policy 5 Traffic and Transport Management be amended to make reference to the requirements of the Trans-European Transport Networks (TEN-T) Regulations and the recommendations of other policy documents such as the NRA M50 Demand Management Report 2014, DECLG Spatial Planning and National Roads: Guidelines for Planning Authorities 2012, and the N4 and N7 Corridor Study.</p>

Chapter 7 Summary of Recommended Amendments to the Draft Plan

Section	Response Issue	Recommended Amendments
7.1.0 Water Supply & Wastewater	Water Supply & Wastewater	<p>Amend the wording of IE1 Objective 2 to as follows:</p> <p>To work in conjunction with Irish Water to facilitate the timely delivery of ongoing upgrades and the expansion of water supply and wastewater services to meet the future needs of the County and the Region</p>
	Water Supply & Wastewater	<p>Insert new objectives in Section 7.1.0:</p> <p>To support the provision of integrated and sustainable water services through effective consultation with Irish Water on the layout and design of water services in relation to the selection and planning of development areas and the preparation of Masterplans/LAPs/ SDZ Planning Schemes.</p>
	Water Supply & Wastewater	<p>Insert new objectives in Section 7.1.0:</p> <p>To support the provision of additional strategic covered storage areas for treated drinking water in the County to provide resilience and flexibility in the drinking water supply in the Greater Dublin Area</p>
	Water Supply & Wastewater	<p>Insert a new subsection into Section 11.6.1: Water Management titled:</p> <p>(vi) Water Services</p> <p>Applicants should consult with Irish Water regarding requirements regarding way leaves and buffer zones around public water utilities and any capacity issues prior to applying for planning permission – where practicable. Additionally, to facilitate the provision of integrated and sustainable water services, applicants should consult with Irish Water in relation to the layout and design of water services.</p> <p>The provision of private waste water treatment facilities, other than single house systems, will be strongly discouraged and all new developments will be required to utilise and connect to the public wastewater infrastructure, where practicable.</p>
	Water Supply & Wastewater	<p>Amend the text of Action on page 121 of the Draft Plan to refer to Water Safety Plans.</p>

SFRA	Flood Risk Assessment	It is recommended that the initial SFRA be amended to inform the preparation of the Draft Plan in conjunction with the consultants to produce a finalised Strategic Flood Risk Assessment (SFRA).
SFRA	Development Plan Preparation	It is recommended that the initial SFRA be amended to inform the preparation of the Draft Plan in conjunction with the consultants to produce a finalised Strategic Flood Risk Assessment (SFRA).
SFRA	Greenogue Industrial Estate	It is recommended that the updated SFRA, carried out in conjunction with the consultants, remove reference to investigating flood zones for undefended scenario at Greenogue Industrial Estate.
7.3.0 Flood Risk Management	Moneenalion Commons, Baldonnell	It is recommended that the Draft County Development Plan maps be amended to rezone the lands at Moneenalion Commons from EE in the Draft Plan to Rural (RU) and that IE3 SLO1 be removed from the written statement.
7.8.0 Aerodromes & Airports	Public Safety Zones at Casement	Insert the following into IE Objective 8 (a) In general, no development shall be permitted within the Public Safety Zones.
11.6.6	Public Safety Zones at Casement	Insert the following paragraph into Section 11.6.6 Aerodromes under (iii) Development Restrictions at Aerodromes Public Safety Zones Public Safety Zones are areas of land at the end of runways established to control the number of people on the ground at risk in the unlikely event of an aircraft accident on take-off or landing. These areas are delineated as a triangular shape on the Development Plan maps and in general, no development shall be permitted within these zones.
7.8.0 Aerodromes & Airports	Department of Defence Inner Zone	Amend the wording of IE8 Objective 5 and Section 11.6.6 Aerodromes in the Draft Plan to include: Within the Department of Defence Inner Zone (delineated on Map), in addition to the Obstacle Limitation Surfaces for the Aerodrome, no buildings or structures exceeding 20m in height above ground level should be permitted except where specifically agreed in writing following consultation with the Department of Defence that the proposed development will not affect the safety, efficiency or regularity of operations at the aerodrome.
7.8.0	Weston	Amend the text of IE9 Objective 6

Aerodromes & Airports	Aerodrome	To facilitate the development of ancillary uses at the aerodrome within its existing setting and consolidate the aviation operations given its proximity to Casement Aerodrome, Dublin Airport and neighbouring suburban residential areas
	General	It is recommended that the Draft Plan be amended to include the following objective: To support the provision of strategic piped infrastructure.
	General	It is recommended that the Draft County Development Plan be amended to include reference to the emerging European Resilience Management Guidelines being prepared by the Regional Assembly.

Chapter 8 Summary of Recommended Amendments to the Draft Plan

Section	Response Issue	Recommended Amendments
General	General	It is recommended that the wording of the Action under Green Infrastructure Policy 1 be amended to include the phrases 'and implement' and 'in accordance with international best practice and emerging national guidance'.
8.0 Introduction	General	It is recommended that the Draft County Development Plan be amended to include additional text to integrate the objectives of the Green Infrastructure Strategy throughout all relevant Council plans e.g. Local Area Plans, County Biodiversity Plan and other action plans.
8.1.0 Green Infrastructure Network	Greening of infrastructural projects	It is recommended that a new objective be added to include: To incorporate appropriate elements of Green Infrastructure <i>e.g.</i> new tree planting, grass verges, planters <i>etc.</i> into existing areas of hard infrastructure wherever possible, thereby integrating these areas of existing urban environment into the overall Green Infrastructure network.
8.2.0 Watercourses	Invasive Species	It is recommended that additional objectives be added to Policy G2 of the Draft County Development Plan as follows: <ul style="list-style-type: none"> To seek to control and manage non-native invasive species and to develop strategies with relevant stakeholders to assist in the control of these species throughout the County. The Council will endeavour to prevent the loss of woodlands, hedgerows, aquatic habitats and wetlands wherever possible including requiring a programme to monitor and restrict the spread of invasive species

		such as those located along the River Dodder.
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Chapter 9 Summary of Recommended Amendments to the Draft Plan

Section	Response Issue	Recommended Amendments
9.1.0 Built Heritage and Architectural Conservation	Details and Provisions for Archaeological Heritage	<p>Augment Section 9.1.1 to acknowledge “The Framework and Principles for the Protection of Archaeological Heritage” (1999) as the national policy document on the protection of archaeological heritage.</p> <p>It is recommended that the text in the introduction Chapter 9 of the Draft County Development Plan be amended to acknowledge the benefits of protecting the heritage and landscapes of the County.</p> <p>It is recommended that the following amendments be made:</p> <ul style="list-style-type: none"> ▪ Amend Section 9.1.1 of the Draft Plan to acknowledge “The Framework and Principles for the Protection of Archaeological Heritage” (1999) as the national policy document on the protection of archaeological heritage. ▪ Amend the introduction of Chapter 9 of the Draft Plan to acknowledge the benefits of protecting the heritage and landscapes of the County including Archaeological Heritage. ▪ It should also be stated that the boundary defining Zones/Areas of Archaeological Potential for the Recorded Monuments listed and mapped in the County Development Plan does not necessarily define the full extent of the site or monument and that certain monuments on the RMP that have been deemed to be of national importance or are within the ownership of the state are also designated as National Monuments. ▪ Amend HCL 2 Objective 4 of the Draft Plan to include for the protection of any discovered battlefield sites of significant archaeological potential within the County. ▪ Amend Section 11.5.1 of the Draft Plan to: <ul style="list-style-type: none"> ○ Require new buildings within an Area/Zone of Archaeological Potential to be designed to have minimal impact on archaeological features; ○ Have regard to archaeological concerns when considering proposed infrastructure and roadworks located in close proximity to Recorded Monuments and Places; ○ Require archaeological testing to be carried out as part of an archaeological assessment where it's deemed that a proposed development may have an impact on an archaeological site or monument ○ Require archaeological monitoring to be carried out during the course of development works where it is considered necessary to identify and protect potential archaeological deposits, features or

		<p>objects.</p> <ul style="list-style-type: none"> ○ Require full archaeological excavation where it is recommended by the National Monuments Service or any superseding body. ○ Have regard to Emerging Historic Landscape Character Assessments contained within the Landscape Character Assessment of South Dublin County 2015 when assessing relevant planning applications.
11.5.1	Built Heritage and Architectural Conservation	<p>Amend Section 11.5.1 to:</p> <ul style="list-style-type: none"> • Require new buildings within an Area/Zone of Archaeological Potential to be designed to have minimal impact on archaeological features; • Have regard to archaeological concerns when considering proposed infrastructure and roadworks located in close proximity to Recorded Monuments and Places; • Require archaeological testing to be carried out as part of an archaeological assessment where it's deemed that a proposed development may have an impact on an archaeological site or monument • Require archaeological monitoring to be carried out during the course of development works where it is considered necessary to identify and protect potential archaeological deposits, features or objects. • Require full archaeological excavation where it is recommended by the National Monuments Service or any superseding body. • Have regard to Emerging Historic Landscape Character Assessments contained within the Landscape Character Assessment of South Dublin County 2015 when assessing relevant planning applications
9.1.0 Built Heritage and Architectural Conservation	Mill Lane ACA and Protected Structures	Amend HCL 4 SLO 1 (Palmerstown Lower Mill Complex ACA) to include for the promotion of the restoration of industrial heritage and mill structures including mill races and expand the exploration of uses mentioned under the SLO to include tourism/outdoor recreation uses.
Table 9.1 & maps	Balrothery Cottages	Amend Plan to designate Balrothery Cottages within an independent ACA. Amend Development Plan Maps and Table 9.1 accordingly.
9.2.0 Landscapes	Views and Prospects	Amend section 11.5.5(ii) of the County Development Plan to clarify that the requirement to carry out Landscape Impact Assessment includes development that could potential impact on designated on views or prospects.
Maps	Views and Prospects	<p>Identify the following views for protection and preservation on Development Plan Maps:</p> <ul style="list-style-type: none"> • Ballinascorney Lane: Views along the entire eastern side of the lane and intermittent views along the western side of the lane. • Ballymaice Lane: Views along the entire eastern side of the lane.

		<ul style="list-style-type: none"> Shankhill Road: Intermittent views along both sides of the road particularly the western side.
9.2.0 Landscapes	Landscape Character Assessment	Amend Chapter 9 introduction to acknowledge the benefits of protecting the heritage and landscapes of the County and insert details in relation to the background of the LCA process into 9.2.0.
9.2.0 Landscapes	Landscape Character Assessment	Amend Section 11.5.5(ii) to support development that enhances existing degraded landscapes and include a need to ensure that development is carefully sited, designed and of an appropriate scale.
9.2.0 Landscapes	Dublin Mountains	Amend HCL 9 Objective 3 to refer to the future expansion of the Wicklow Mountains National Park within South Dublin.
9.2.0 Landscapes	Liffey Valley	Amend HCL 10 Objective 4 to make reference to 'Towards a Liffey Valley Park' (2007) and to promote universal accessibility for all, where environmental and built heritage sensitivities are not negatively impacted.
9.2.0 Landscapes	Dodder Valley	Amend HCL 10 Objective 4 to promote universal accessibility for all, where environmental and built heritage sensitivities are not negatively impacted.
9.4.0 Public Rights of Way and Permissive Access Routes	General	Amend HCL Policy 16 to promote and improve access to high amenity, scenic and recreational areas within adjoining counties.
9.4.0 Public Rights of Way and Permissive Access Routes	Permissive Access Routes	Amend HCL 16 Objective 2 to seek to ensure that Permissive Access Routes do not compromise environmentally sensitive sites.
9.5.0 Tree Preservation Orders	-	Amend introductory text and tables contained under Section 9.5.0 (Tree Preservation Orders) of the Draft County Development Plan together with the Development Plan Maps to reflect the approval of the TPO for Newcastle Road Lucan and correct reference to Table 9.5.
9.3.5	-	Relocate HCL 17 Objective 2 (trees, hedgerows and woodlands) to the list of objectives under Policy 15 (non-designated areas) and amend the objective to refer to the need to accord with 'Living with Trees: South Dublin County Council's Tree Management Policy 2015-2020'.

9.7.0 Sites of Geological Interest	-	<p>It is recommended that the Draft County Development Plan be amended as follows:</p> <ul style="list-style-type: none"> Identify all 10 sites of County geological interest, as selected under 'The Geological Heritage of South Dublin County: An Audit of County Geological Sites in South Dublin County', as County Geological Sites under Section 9.7.0 of the Draft Plan and map on Draft Plan Maps accordingly. Amend the introduction to Section 9.7.0 to recognise the importance of geological heritage as an intrinsic component of natural heritage. Geology is recognised as an intrinsic component of the County's heritage resource, to be protected and promoted for its heritage value and for its potential in educational, scientific, recreational, and geo-tourism initiatives. Amend Section 11.3.8 of the Draft Plan (Extractive Industries) to include reference to the 'Guidelines on Geological Heritage for the Extraction Industry'. Reference to the NRAs guidance document ('Guidelines on Procedures for Assessment and Treatment of Geology, Hydrology and Hydrogeology for National Road Schemes') in Chapter 11 to be included.
11.3.8	Sites of Geological Interest	Amend Section 11.3.8 of the Draft County Development Plan (Extractive Industries) to include reference to the 'Guidelines on Geological Heritage for the Extraction Industry'.

Chapter 10 Summary of Recommended Amendments to the Draft Plan

Section	Response Issue	Recommended Amendments
10.2.0	General Small Scale Hydro-Electricity Projects	Amend Energy (E) Policy 8 to It is the policy of the Council to encourage the roll-out of small-scale hydroelectric projects on the rivers, watercourses, dams and weirs across the County, where they do not impact negatively on freshwater species (including protected aquatic species), birds and mammals, biodiversity and natural or built heritage features.
10.2.0	General Small Scale Hydro-Electricity Projects	Amend E8 Objective 1 to To support the roll-out of small-scale hydroelectric projects on the rivers, watercourses, dams and weirs across the County, where projects do not impact negatively on freshwater species (including protected aquatic species), birds and mammals, biodiversity and natural or built heritage features.
10.2.0	Service Providers and	Amend Energy (E) Policy 11

	Energy Facilities	It is the policy of the Council to ensure that the provision of energy facilities is undertaken in association with the appropriate service providers and operators, including ESB Networks, Eirgrid and Gas Networks Ireland. The Council will facilitate the sustainable expansion of existing and future network requirements, in order to ensure satisfactory levels of supply and to minimise constraints for development.
10.2.0	Energy and Communications Infrastructure in Sensitive Landscapes	Amend Energy (E) Policy 12 to include It is the policy of the Council that all planning applications for energy and communications infrastructure on lands located in rural, high amenity and mountain areas (Zoning Objectives RU, HA-LV, HA-DV and HA-DM) shall include a Landscape Impact Assessment of the proposed development on the landscape and shall be subject to screening for potential impacts on Natura 2000 sites.

Chapter 11 and Maps - Summary of Recommended Amendments to the Draft Plan

Section	Response Issue	Recommended Amendments
11.1.0	Office over 1,000sqm	As per Section 4 of this report, recommended that the wording of ET1 Objective 6 in Chapter 4 of the Draft Plan be amended.
11.1.0	High Amenity – Liffey Valley (Table 11.13)	Amend Table 11.13 of the Draft County Development Plan relating to the High Amenity Liffey Valley (HA-LV) zoning objective matrix to include ‘Recreational Facility’ and ‘Sports Club/Facility’ uses as Open for Consideration, subject to restriction/caveats regarding their location/premises, scale, assessment of their landscape impact, and set back from the bank of the River Liffey.
11.1.0	High Amenity – Dodder Valley (Table 11.14)	Amend Table 11.14 of the Draft County Development Plan relating to the High Amenity Dodder Valley (HA-DV) zoning objective matrix to include ‘Recreational Facility’ and ‘Sports Club/Facility’ uses as Open for Consideration, subject to restriction/caveats regarding their location/premises, scale, assessment of their landscape impact, and set back from the bank of the River Dodder.
11.2.8	Advertising Signs	Amend Section 11.2.8 of the Draft Plan to include additional standards for Digital and Electronic Signage. Such signage should be limited to town centres and/or large retail precincts. Such signs should make a positive contribution to the public domain, omit no sound, have a minimum dwell period of 30 seconds (with a crossfade), not

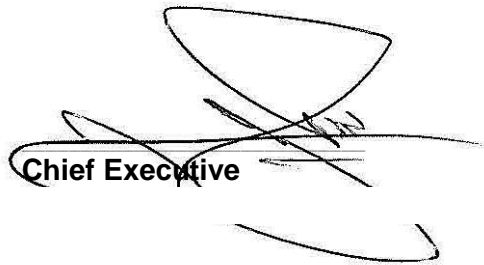
		to result in obtrusive light that will create unacceptable glare (adjusting to environmental conditions), have limited hours of operation (esp. at night), not contain dynamic content (i.e. video) and not constitute a traffic hazard
11.3.8	Extractive Industry	Amend Section 11.3.8 of the Draft Plan to include reference to relevant national guidance on quarries and ancillary activities.
11.4.6	Travel Plans	Amend Section 11.4.6 to add requirement for the submission of a school travel plans for all new schools (and major extensions).
Table 11.23	Bus Parking	Amend Table 11.23 to include bus parking for pitches at the rate of 1 per pitch, with a subsequent reduction in car parking.
11.4.3	Electric Car Parking	Amend Section 11.4.3 of the Draft County Development Plan to include reference to the provision of dedicated facilities for the charging of battery operated cars at a rate of up to 10% of the total car parking spaces in residential developments.

11.5	Archaeological Heritage	<p>Amend the Chapter 9 introduction to state that the boundary defining Zones/Areas of Archaeological Potential for the Recorded Monuments listed and mapped in the County Development Plan does not necessarily define the full extent of the site or monument.</p> <p>Amend Section 11.5.1 to:</p> <ul style="list-style-type: none"> • Require new buildings within an Area/Zone of Archaeological Potential to be designed to have minimal impact on archaeological features; • Have regard to archaeological concerns when considering proposed infrastructure and roadworks located in close proximity to Recorded Monuments and Places; • Require archaeological testing to be carried out as part of an archaeological assessment where it's deemed that a proposed development may have an impact on an archaeological site or monument • Require archaeological monitoring to be carried out during the course of development works where it is considered necessary to identify and protect potential archaeological deposits, features or objects. • Require full archaeological excavation where it is recommended by the National Monuments Service or any superseding body. <p>• Have regard to Emerging Historic Landscape Character Assessments contained within the "Landscape Character Assessment of South Dublin County" (2015) when assessing relevant planning applications.</p>
11.5.5	High Amenity and Sensitive Landscapes	Amend Section 11.5.5(ii) to support development that enhances existing degraded landscapes and include a need to ensure that development is carefully sited, designed and of an appropriate scale.
11.5.5	Fencing	Amend Section 11.5.5 (iii – fencing) to prohibit barbed wire fencing.
11.5.5	Public Rights of Way	Amend Section 11.5.5 of the Draft Plan to insert a requirement that seeks the identification of Public Rights of Way and established walking routes as part of any planning applications for new golf courses within the County.
SEA Environmental Report	Environmental Assessment	<p>Amend Section 9.6 (Responsibility) of the SEA Environmental Report to include addition of text as follows:</p> <p>South Dublin County Council are responsible for the implementation of the SEA Monitoring Programme including</p> <ul style="list-style-type: none"> • Linking SEA monitoring output with the mid-term review of the Development Plan; • Monitoring specific indicators and identifying any significant effects, including cumulative effects;

		<ul style="list-style-type: none"> • Reviewing the effectiveness of monitoring/mitigation measures during the lifetime of the Plan; and • Identifying any cumulative effects
Maps	Bush Centre	Amend the location of the C1 SLO symbol on the map.
Maps	Balgaddy	Amend map at Balgaddy in accordance with recommendations in Section 3 and 5 of this report. (Introduce LC zoning)
Maps	Trees & Woodlands	Amend the map to provide for symbols to reflect existing trees and woodlands to protect same (subject to accurate mapping data of same being available). In the event that the dataset is unavailable in time for the Plan adoption, it is recommended that an Action be inputted into the Plan to complete the desktop survey.
Maps	NTA GDA Cycle Network	Amend the mapped NTA Greater Dublin Cycle Network Plan to reflect the alignment of the Part 8 for the Tallaght to Ballyboden route
Maps	ACA	Designate Boden Village Cottages within an ACA. Amend Development Plan Maps and Table 9.1 accordingly.
RPS	RPS	Amend the Draft Plan to retain the Orchard House, Galway Road, Lucan - Icehouse (RPS Ref 90) under the Record of Protected Structures and map correctly using revised co-ordinates.
Housing Strategy		It is recommended that Section 2.1.0, Housing Policy 1, H1 Objective 2 and the Housing Strategy contained in Schedule 3 of the Draft County Development Plan be amended to reflect the recent amendments to Part V of the Planning and Development Act (as amended) including changes to the percentage of lands that must be provided for social and affordable housing and the prescribed mechanism to fulfil the Part V obligations. The Interim Housing Strategy should also be amended to a finalised Housing Strategy that reflects the changes to Part V. The stated intention to carry out a review of the Interim Housing Strategy should also be removed from the Draft County Development Plan and the finalised Housing Strategy.
RPS	Edmondstown Road	Amend Draft Plan to reflect the correct spelling of 'Edmondstown Road' under RPS Ref 426.
Table 11.21	Apartment Standards	Amend Table 11.21 of the Draft Plan regarding Minimum Space Standards for Apartments to state 'Apartments' in lieu of 'Houses' in the second column of the table.

CONCLUSION

Taking account of the proper planning and sustainable development of the County, it is recommended that the proposed amendments to the Draft South Dublin County Council Development Plan 2016 – 2022 be made in accordance with the recommendations of this report.



Chief Executive

11th December 2015

Date

APPENDICES

Appendix A

ENVIRONMENTAL REPORT

Response to the Environmental Issues arising from

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

following the 1st public display of the Draft South Dublin County Council Development Plan 2016-2022 and Environmental Report

December 2015
Land Use Planning and Transportation Department,

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Introduction

The purpose of this Report is:

- To detail the written submissions received from the Environmental Authorities and the Non Statutory Submissions following the public display period of the Draft County Development Plan 2016-2022 and accompanying Environmental Report and Appropriate Assessment screening.
- To set out the Chief Executives response to the issues raised in the submissions and;
- To make recommendations on the amendment to the Draft County Development Plan as appropriate.

Legislative Background

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

Section 13(C) of the Planning and Development Act (Strategic Environmental Assessment) Regulations 2004-2011 requires that, inter alia, any reference to a draft development plan in Section 12 (2) of the Act is to be construed as also referring to the environmental report. Therefore submissions or observations made under Section 12 (2) in relation to both the Draft County Development plan and the Environmental Report must be considered under Section 12(4) of the Act through the Chief Executive's Report.

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

Key Stages in the Strategic Environmental Assessment (SEA) of the draft South Dublin County Development Plan 2016-2022 to date.

Table 1. Key SEA stages to date.

Date	Stage
5 th September 2014	<p>The Council gave notice on the 5th September 2014 of the intention to review the County Development Plan 2010-2016 and prepare a new County Development Plan for the South Dublin County Council area.</p> <p>It was also stated that the Planning Authority would carry out a Strategic Environmental Assessment [SEA] as part of the review process. As a part of this process, the Planning Authority would prepare an Environmental Report on the likely significant effects on the environment of implementing the proposed plan.</p> <p>Written submissions or observations regarding the review of the existing County Development Plan and the preparation of the proposed Plan were invited from members of the public and other interested parties.</p>
11 February 2015	<p>The Scoping Issues Paper was sent to the Environmental Authorities i.e. the Environmental Protection Agency (EPA), the Department of the Environment, Community and Local Government (DECLG) and the Department of Communications, Energy and Natural Resources (DCENR). Submissions or observations were invited in relation to the scope and level of detail of the Environmental Report.</p>
10 th March 2015	All submissions received from the Environmental Authorities.
April 2015	Responses to the Environmental Authorities Submissions on the issues paper were included within the Scoping Report and recommendations from the Environmental Authorities incorporated into the ongoing Environmental Report.
11 th May 2015	Pre-Draft County Development Plan, Environmental Report and Appropriate Assessment Screening delivered to Elected Representatives for review and to allow for motions of amendment.
18 th , 25 th , 29 th June 2015	Assessment and mitigation of environmental affects of implementing elected members motions outlined in Managers Report. Adoption of motions of direction regarding Draft Development Plan.
July 13 th - September 24 th 2015	Public consultation period for Draft Development Plan, Environmental Report and Appropriate Assessment Screening

Submissions from Environmental Authorities, July-September 2015

The table below sets out the submissions from the Environmental Authorities and the environmental non-statutory submissions in relation to the Draft Development Plan 2016-2022, accompanying Environmental Report and Appropriate Assessment Screening. The table also contains a response by the Chief Executive pertaining to the item.

Submission Summary	Comment
<p>Submission No.1: (DRAFTDEVPLAN0510) <i>Department of Arts, Heritage and the Gaeltacht</i></p> <p>Nature Conservation</p> <p>It is recommended that the boundaries of SAC and pNHA are checked with the National Parks and Wildlife Service of this Department prior to finalising the Plan, as boundaries can change from time to time. Also checking any changes to legislation e.g. the Flora (Protection) Order of 2009 has been replaced by the Flora (Protection) Order of 2015, SI 356 of 2015</p> <p>The Department welcomes the strong protection given to the natural heritage in the draft Plan, particularly that it recognises the importance of maintaining biodiversity and a network of interconnected corridors.</p> <p>Greenways and Cycle Network The Department advises that ET Policy 6 (greenways, trails and loops) has the potential to result in substantial loss of biodiversity and care will need to be taken to ensure that this does not happen. Alternative routes may need to be found as mitigation. Where such routes are proposed along waterways it should be noted that other habitats should be taken as a 10 metre area on either side of a waterway.</p>	<p>The submission is noted and acknowledged</p> <p>The submission is noted and acknowledged</p> <p>The submission is noted and acknowledged. Policy G3 Objective 2 seeks to maintain a biodiversity protection zone of not less than 10 metres from the top of the bank of all watercourses in the County, with the full extent of the protection zone to be determined on a case by case basis by the Planning Authority, based on site specific characteristics and sensitivity. Policy HCL13 protects the pNHAs against any development proposals that may negatively impact on them. Also Policy HCL 12 and HCL15 protects impacts of development on Natura 2000 and non-designated areas respectively. Policy IE7 Objective 5 ensures external lighting schemes do not adversely impact on biodiversity.</p>

<p>Green Infrastructure</p> <p>Advises that the placing of new infrastructure in green areas can impact negatively on biodiversity and care should be taken to ensure that green infrastructure is not interpreted as adding infrastructure to green areas.</p> <p>When preparing the County green infrastructure strategy it is important to take note of the EU green infrastructure strategy</p> <p>The Department advises that there is potential conflict between HCL 11 Objective 1 (biodiversity of Grand Canal) and HCL 11 Objectives 2, 3 and 7 (walking and cycling routes). A route along the full length of the river Dodder has potential for loss of biodiversity including rare plants and disturbance to otters and kingfishers.</p> <p>Any proposed hydroelectricity projects in the Dodder or any other watercourses will need to take into account protected aquatics species as well as birds and mammals</p> <p>Flooding</p> <p>Policy G3 Objective 3, to protect, improve or restore floodplains, seems to conflict with a zoning for development of areas prone to flooding in Baldonnell. Flood plains should be left undeveloped to allow for the protection of these valuable habitats and provide areas for flood water retention.</p>	<p>The submission is noted and acknowledged. It is considered that additional text can be included to define the importance of greening existing 'grey' infrastructure and to promote its appropriate use across the County.</p> <p>Recommendation</p> <p>Inclusion of objective to Policy G2 regarding GI in existing hard infrastructure</p> <p>Acknowledged. The European Commission's Communication, '<i>Green Infrastructure (GI) — Enhancing Europe's Natural Capital, 2013</i>', underpins the important role of GI and describes the future EU strategy. It sets out key areas for strategy development and promotes the delivery of GI across urban and rural areas in all Member States. The Green Infrastructure strategy for the County will be prepared within a hierarchy of strategy, policy and plans, including guidance at an EU, National and Regional level.</p> <p>Acknowledged. Policy HCL13 protects the pNHAs against any development proposals that may negatively impact. Furthermore Policy G3 Objective 2 details the maintenance of a biodiversity protection zone from the top of the bank of all watercourses with the full extent of the protection zone determined on a case by case basis</p> <p>Acknowledged. All projects are subject to the legislative requirements of Appropriate Assessment Screening and, if required, Environmental Impact Assessment. These statutory obligations must be fulfilled and any impacts on the environment will be assessed. These requirements are noted in Chapter 11, Section 1.8.0 of the Draft Plan. Furthermore Policy E8 states that hydroelectric projects will be supported where they do not have negative impacts on the receiving environment</p> <p>Acknowledged. As detailed in Section 3.7.8.2 and in Appendix 1 of the ER, the proposal to retain the Employment zoning at Baldonnell was contrary to the CE's recommendation during the preparation of the Draft Plan. The retention of this zoning (as Employment Lands) would undermine the development strategy of the Development Plan as assessed by the Environmental Report. This would have direct negative consequences for</p>
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<p>Roads, Bridges and Other Routes</p> <p>The Department notes that a number of proposals are likely to impact on NHAs, pNHAs and on biodiversity. The proposed new bridge over the Dodder from Bohernabreena to Kiltipper Road has the potential to remove habitats listed on the Habitats Directive but which are outside of a Natura 2000 site. The Local Authority should consider the implications of this in view of the submission of a report to the European Commission by each Member State every 6 years reporting loss to the natural resource of annexed habitats and species. The proposed crossing of the Dodder upstream of the city weir at Firhouse will impact on the Dodder pNHA. Long terms road proposals that would go through agricultural lands to the west of the County and disturb such lands through loss of connectivity of ecological corridors,</p>	<p>Biodiversity (river and hedge systems), Transport (no high quality public transport nearby), Heritage (impacts on RMP021- 021 & 021-020/Landscape (Visual Sprawl in a rural area)/Rivers (Camac)/Flooding (Camac) in the zoned area, as well as indirectly having negative effects on the sustainable reuse of brownfield sites, biodiversity, landscape, and increased car usage. The Draft Plan has proposed locations for Employment zoned lands, based on need and suitable location.</p> <p>The retention of zoning of large additional areas of agricultural land for industrial purposes would undermine the development strategy outlined in the Environmental Report, and would facilitate the sprawl of industrial development in numerous locations in the county, rather than in certain appropriate areas. While some conflicts would be likely to be mitigated by measures which have been integrated into the draft Plan, including those which have arisen from the SEA process, there are likely to be significant residual negative impacts.</p> <p>As part of the County Development Plan and SEA process for the Draft Development Plan 2016-2022, a SFRA was carried out for the County, with a Detailed FRA carried out for these lands, resulting in evidence based data being reported on flood risk.</p> <p><u>Recommendation</u> Revert to an agricultural zoning ('RU') for the lands at Moneenalion Commons Upper. Amend Map 8 of the Draft Plan accordingly.</p> <p>Acknowledged. Section 8 of the ER details the mitigation measures provided for within the draft Plan in relation to Biodiversity, Flora and Fauna and Landscape. All proposals are subject to undergoing environmental assessment at project level in accordance with the AA and EIA Directives. However, further to the concerns with regards to the provision of a road infrastructure, it is considered that an additional objective (associated with Policy TM4 in Chapter 6) should be provided in the Draft Plan.</p> <p><u>Recommendation</u> Policy TM4 Objective 4 To ensure that all road and street networks proposals have regard to pertaining environmental conditions and</p>
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loss of habitat and facilitation of future development. Roads and public transport proposals may also impact on the Grand Canal at Gollierstown and the Liffey Valley pNHA at two locations.

Wicklow National Park

The Wicklow Mountains National Park extends into the Dublin Mountains and it is intended to extend the park further into County Dublin and Wicklow. It is advised that HCL Policy 9 Objective 3 (Dublin Mountains) should be amended to refer to the future expansion of the National Park as opposed to its creation. Rather than the wording “to ensure that development within the Dublin Mountains will not prejudice the future creation and development of a National Park...”, an alternative wording may be “To ensure that development within the Dublin Mountains will not prejudice the future expansion and development of the Wicklow Mountains National Park.... “

Strategic Environmental Assessment

The SEA could have been more robust in its assessment of the impacts on biodiversity

Cumulative Impacts

There needs to be more of a focus on potential cumulative impacts. For example while the Dodder CFRAMS has been mentioned in the SEA under Section 5.5 entitled “interactions with relevant planning policy”, the actual flood protection projects along the Dodder do not appear to have been assessed for cumulative impacts on biodiversity.

sensitivities and incorporate appropriate avoidance and mitigation measures as part of any environmental assessments

Acknowledged. In the interests of clarity, HCL 9 Objective 3 should be amended to facilitate the expansion of Wicklow Mountains Park as opposed to its creation

Recommendation

Amend HCL 9 Objective 3 to include reference to supporting the NPWS objective to expand the Wicklow Mountains National Park in the future

It is acknowledged in Section 3.3.8 of the Environmental Report that a lack of Biodiversity or Habitat Plan for the County constrains assessment at local level. The Biodiversity Plan is a requirement of the Draft Plan (HCL Policy 1 Objective 2). The Biodiversity Plan is also an action of the Draft County Heritage Plan and it is intended to complete the Biodiversity plan in 2016.

A Level 2 Habitat Survey was completed in 2010 with the production of a Habitat Map for the County. A number of areas within the County have Level 3 Habitat Surveys completed (carried out as part of projects/studies); however a number of gaps exist across the County which has been recognised in the ER and will be addressed as part of the Biodiversity Plan and GI Strategy.

Acknowledged. Section 3 of the Environmental Report notes the cumulative impacts of development on the environmental baseline. Section 7 also looks at the cumulative impact of the alternative plan scenarios. It is noted that while there are no proposed flood protection projects within the South Dublin area, there are works within adjoining Local Authority areas and these works should be noted.

<p>It should also be noted in Section 3.3.4 that the Dodder supports Brook Lamprey which are listed on Annex II of the Habitats Directive, as well as supporting rare flora along its length.</p> <p>SEOs, indicators and targets Amend SEO, indicators and targets for biodiversity flora and fauna to clarify the word 'relevant'. SEOs should also be expanded to ensure they cover protected species.</p> <p>Mitigation The tabular assessment of the draft Plan policies in Appendix 1 indicates that there may be an impact on habitat connectivity, biodiversity and landscape from pedestrian and cycleway but that “these will likely be mitigated”. It is not clear if these proposed mitigations have been put in the draft Plan or have yet to be put into the draft Plan. In some cases where a cycle network is proposed mitigation by avoidance may be necessary to prevent significant loss of biodiversity.</p> <p>Appropriate Assessment Screening Some of the main issues for AA screening are the extra resources required for the extra population envisaged by way of potable water and wastewater treatment as well as extra people pressure on Natura 2000 sites used for recreational purposes. The assessment should include a discussion of the proposed water abstraction from the River Shannon.</p>	<p>It is recommended that additional text can be included to collate and further expand on the potential cumulative impacts</p> <p><u>Recommendation</u> Update Section 7 of the Environmental Report regarding Cumulative Impacts Update Section 3.7.8 (Flooding) in relation to the cumulative impact of the flood protection projects on the Dodder</p> <p>Acknowledged <u>Recommendation</u> Amend Section 3.3.4 of the ER to include reference to Brook Lamprey and rare flora along the Dodder.</p> <p>Acknowledged. <u>Recommendation</u> Amend SEO, indicators and targets for SEO B1 in the Environmental Report to omit “relevant” to avoid any confusion over same.</p> <p>Acknowledged. Section 8 of the ER details the mitigation measures provided for within the draft Plan in relation to Biodiversity, Flora and Fauna and Landscape. Further to the concerns with regards to the provision of a cycle network noted above, it is considered that an additional objective (associated with Policy TM3) should be provided in the Draft Plan.</p> <p><u>Recommendation</u> Policy TM3 Objective 5 To ensure that all walking and cycling routes have regard to pertaining environmental conditions and sensitivities and incorporate appropriate avoidance and mitigation measures as part of any environmental assessments.</p> <p>Acknowledged. The Eastern and Midlands Regional Water Supply Project recently identified abstraction from the lower Shannon as the emerging preferred option. All stages of the process have been subject to environmental studies to date and the final option will adhere to the legislative requirements of the SEA, AA and EIA Directives.</p> <p><u>Recommendation</u> Amend the Screening Report for Appropriate Assessment to include reference to the Eastern and Midlands</p>
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<p>AA screening/AA The Department believes there is some confusion between AA screening and AA. Section 5.2.vi implies that appropriate assessment screening should assess impacts on the integrity of a Natura 2000 site, which was done at appropriate assessment stage thus creating confusion between appropriate assessment screening and appropriate assessment.</p> <p>It is also stated that the proposed bridge between Bohernabreena Road and Kiltipper Road is unlikely to have an impact on the SAC because the bridge would be downstream, however, this implies that groundwater does not play any role including springs. This needs to be clarified and, if necessary, a NIS may need to be produced.</p> <p>Conservation Objectives Table 2.iv quotes generic conservation objectives for North and South Dublin Bay SACs. There are more detailed conservation objectives available for these sites and the AA screening should be amended. Details of designated sites and species and up to date conservation objectives can be found on www.npws.ie.</p>	<p>Regional Water Supply Project and the implications of same.</p> <p>Acknowledged. In the interests of the clarity, Section 2 & 5 of the Screening for Appropriate Assessment report will be amended to address any confusion that may exist.</p> <p><u>Recommendation</u> Amend Section 2 & 5 of the Screening for AA report to clarify the purpose and intention of the report</p> <p>Acknowledged. The proposed bridge between Bohernabreena Road and Kiltipper is illustrated on the Draft Development Plan Maps as an indicative route only. The exact location of the proposed bridge will be determined following environmental assessment and detailed route selection and consultation. While the concerns of the impact of the proposed bridge have been noted in the report, undergoing detailed environmental assessment at project level (in accordance with the Habitats Directive) will further determine the impacts on the receiving environment. Provisions for Alternative Solutions or avoidance by abandoning the proposed project if the appropriate assessment is negative remain feasible options if the proposed bridge is included in the Draft County Development Plan.</p> <p><u>Recommendation</u> Amend the Screening for Appropriate Assessment Report to reflect the indicative route for the proposed bridge and to clarify the impacts on groundwater and further environmental assessments.</p> <p>Acknowledged.</p> <p><u>Recommendation</u> Amend Section 3.2 of the Screening for Appropriate Assessment document to include the up to date generic conservation objectives as detailed on www.npws.ie</p>
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<p>Submission No. 2</p> <p>Environmental Protection Agency (DRAFTDEVPLAN0052)</p> <p>Specific Comments on Draft Plan</p> <p>Recommendation that any proposed additional zoning / development of lands and associated population growth should be consistent with the Greater Dublin Area Regional Planning Guidelines in particular. The ability of such lands to provide adequate and appropriate critical service infrastructure, and take into account the requirements of the SEA, Habitats, Floods and Water Framework Directives respectively, should also be taken into account.</p> <p>Recommendation to include specific objective/s, where relevant and appropriate, in the Plan to ensure that any planned/future development projects referred to (including industrial regeneration, new roads, community facilities, schools, cycle paths, etc.), take into account the requirements of the EIA, Habitats, Birds, Water Framework and Floods Directives respectively as appropriate.</p> <p>Recommendation to summarise the recommendations of the SFRA (referred to in Section 2 SEA Methodology of the 2.3 Strategic Flood Risk Assessment) under Chapter 7 Infrastructure and Environmental Quality.</p>	<p>Acknowledged. Section 1.4.0 of the Draft Plan details the statutory requirements for the Plan which have been followed.</p> <p>Acknowledged. Section 9.3.1 of the Draft Plan details the requirements of the Habitats Directive with Policy HCL12 stating the Councils policy to support the conservation and improvement of Natura 2000 sites and to protect the network from any plans/projects that are likely to have significant effects. Policy IE2 refers to the Councils policy to meet the requirements of the WFD. Furthermore, the preparation and implementation of the Green Infrastructure Strategy (Policy G1 Objective 2) will assist in meeting statutory obligations under the EU Directives. Chapter 11 of the Draft Plan relates to Implementation. Section 11.8.0 (Environmental Assessment) details specific requirements under the various EU Directives. Furthermore, Section 11.9.0 Development Management Thresholds will provide a list of thresholds for studies and assessments that arise out of Chapter 11 and the statutory requirements from the EU Directives for plans and projects will be detailed here for ease of reference.</p> <p>Acknowledged. The SFRA and SEA for the Draft Plan are companion documents and are required to be read in their entirety in parallel with the Draft Plan (as detailed in Section 1.1.0 and 7.3.0. of the Plan). A summary of the findings of the SFRA in the Draft Plan is not considered necessary as the documents must be read in their entirety.</p>
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<p>Recommendation that a commitment be given that any proposals for significant development on contaminated brownfield sites should consider establishing environmental management plans to ensure these sites are appropriately remediated prior to the commencement of development</p>	<p>Acknowledged. Policy IE2 Objective 10 “<i>To require adequate and appropriate investigations to be carried out into the nature and extent of any soil and groundwater contamination and the risks associated with site development work, in particular for brownfield development</i>” deals with this issue.</p>
<p>Recommendation to include a specific objective relating to the control and management of invasive species in South Dublin, as identified along the River Dodder in SEA ER in Section 3.3.8 Biodiversity: Existing Problems.</p>	<p>Acknowledged. <u>Recommendation:</u> Insert objectives in Ch.8 Green Infrastructure stating that:</p> <p>The Council will endeavour to prevent the loss of woodlands, hedgerows, aquatic habitats and wetlands wherever possible including requiring a programme to monitor and restrict the spread of invasive species such as those located along the River Dodder</p> <p>and also</p> <p>To seek to control and manage non-native invasive species on Council properties and to develop strategies with other stakeholders to assist in the control of these species throughout the County.</p>
<p>Recommendation to investigate trans-boundary connectivity aspects, where relevant, in the preparation and implementation of the proposed Green Infrastructure Strategy. Additionally, where possible, habitat mapping should be undertaken to help inform the preparation of both the Green Infrastructure Strategy and the County Biodiversity Plan.</p>	<p>Acknowledged. Policy HCL1 Objective 2 supports the objectives and actions of the County Heritage Plan (2010), including the preparation of a County Biodiversity Plan. A Level 2 Habitat Survey was completed in 2010 with the production of a Habitat Map for the County. A number of areas within the County have Level 3 Habitat Surveys completed (carried out as part of projects/studies); however a number of gaps exist across the County which has been recognised in the ER and will be addressed as part of the Biodiversity Plan and GI Strategy.</p> <p>Furthermore, it is an Action of Policy G1 to develop the GI Strategy in consultation with key stakeholders and the public. It is considered that this will include adjoining Local Authorities where transboundary connectivity aspects can be explored.</p>
<p>Recommendation to integrate the County Biodiversity Plan and Green Infrastructure Strategy, upon their adoption, in lower level plans to guide future zoning and development and protect areas of significant green infrastructure, ecological corridors and</p>	<p>Acknowledged. Policy HCL1 Objective 2 and Policy G1 Objective 2 support the preparation and implementation of a County Biodiversity Plan and GI Strategy. It is recommended that additional wording be added to the Action associated with Policy G1.</p>

<p>associated biodiversity.</p> <p>Specific Comments on the SEA Environmental Report</p> <p>Recommendation to include relevant environmental summary maps and tables, as appropriate, in the Non-Technical Summary (NTS) of the SEA Environmental Report to highlight the key environmental sensitivities / vulnerabilities in the Plan area, including a summary of the Strategic Flood Risk Assessment findings. Overview information in relation to the key Mitigation and Monitoring Measures would also be beneficial.</p> <p>Recommendation to include a commitment to reviewing, as part of the monitoring programme, the effectiveness of environmental monitoring/mitigation measures during the lifetime of the Plan. The Monitoring Programme should be flexible to take account of specific environmental issues which may arise during implementation of the Plan. In this context, there is merit in linking the SEA and Plan related monitoring. This monitoring programme should also be able to take account of, and identify, potential cumulative effects.</p>	<p>Recommendation: It is recommended that the following wording be added to the Action associated with Policy G1..... <i>The objectives of the Green Infrastructure Strategy will be integrated throughout all relevant Council plans e.g. Local Area Plans, County Biodiversity Plan and other action plans'.</i></p> <p>Acknowledged.</p> <p>Recommendation: Include Figure 3.18 (Environment Sensitivity Map) of the ER in the NTS of the ER</p> <p>Expand Section 3.7.8.2 of the ER to provide a more detailed summary of the SFRA</p> <p>Acknowledged. A specific form of GIS based monitoring is being undertaken in tandem with the assessment of planning applications and is used in order to provide up to the minute data regarding the implementation of the Strategic Environmental Objectives in the current Plan 2010-2016. This will allow for faster reaction to the cumulative impact of the development proposals. A preliminary monitoring report was carried out at the Mid Term Review of the current Plan regarding the effects of implementing the County Development Plan. The results illustrated that no thresholds had been exceeded. Section 9.5 of the Environmental Report details the proposals to continue this system of monitoring and develop it to include for cumulative impacts.</p> <p>Recommendation Addition of text to Section 9.6 (Responsibility) of the Environmental Report : "South Dublin County Council are responsible for the implementation of the SEA Monitoring Programme including</p> <ul style="list-style-type: none"> • Linking SEA monitoring output with the mid-term review of the Development Plan; • Monitoring specific indicators and identifying any significant effects, including cumulative effects; • Reviewing the effectiveness of
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<p>Recommendation for Plan to provide appropriate measures to minimise the potential for significant environmental effects where uncertain/negative effects are identified</p> <p>Future Amendments to the Draft Plan Where amendments to the Plan are proposed, these should be screened for likely significant effects in accordance with the criteria as set out in Schedule 2A of the SEA Regulations and should be subject to the same method of assessment applied in the “environmental assessment” of the Draft Plan.</p>	<p>monitoring/mitigation measures during the lifetime of the Plan; and</p> <ul style="list-style-type: none"> • Identifying any cumulative effects” <p>Noted. Section 8 of the ER details the location of each of the mitigation measures within the Draft Plan to minimise the potential for significant environmental effects.</p> <p>Acknowledged. Requirements of the SEA Directive and transposing Regulations will continue to be complied with.</p>
<p>Submission no 3</p> <p>Department of Communications , Energy and Natural Resources (Geological Survey of Ireland) (DRAFTDEVPLAN0196)</p> <p>Objection to listing of 6 of 10 geological sites identified under the Geological Heritage Audit by reason of initial screening out of sites under the audit, failure to take on advice of GSI, possibly candidacy of one omitted sites (Belgard Quarry) for NHA status, absence of impact of geological site designation on the operation of quarries, interest in such sites being generated by quarrying activity, the limited impact of designation, absence of presumption in identification of sites that a disused quarry will not recommence operation; geological interest of Belgard Quarry, landmark function of aforementioned quarries; absence of impact on safety of quarries. It is requested that full complement of County Geological Sites be included in the Development Plan. Reference should also be made to the Guidelines on Geological Heritage for the Extraction Industry.</p> <p>Amend ET8 Objective 2 or insert new policy to provide for the protection and promotion of the County's geological heritage and</p>	<p>Acknowledged. It is considered that full complement of sites of geological interest should be detailed in the Draft Plan and Environmental Report, as identified in the report “<i>The Geological Heritage of South Dublin County-An Audit of County Geological Sites in South Dublin County</i>”.</p> <p>It is also considered that reference to the Guidelines by the GSI should be detailed in the plan.</p> <p><u>Recommendation</u> Update Table 9.7 of the Draft Plan to include all 10 geological sites. Update text at the start of Section 9.7.0 to commence with “<i>Geology is recognised as an intrinsic component of the County’s heritage resource, to be protected and promoted for its heritage value and for its potential in educational, scientific, recreational, and geo-tourism initiatives</i>”</p> <p>Acknowledged. <u>Recommendation</u> Amend Section 4.5.0, ET8 Objective 2 of</p>

<p>include GSI as an agency to work with in the associated actions.</p> <p>Amend ET10 Objective 3 to seek the production of re-use plans for quarries reaching the end of their productive life. Such plans to provide for retention and promotion of features of geological, biodiversity and industrial heritage value</p> <p>Include reference under 11.3.8 (Extractive Industries) to GSI – ICF Guidelines and require consultation with the Geological Survey of Ireland regarding restoration plans for quarries.</p> <p>Amend 3.4.6 and Table 3.5 (Sites of Geological Interest) of the Environmental Report to include the full 10 CGS and change both headings to 'County Geological Sites'</p> <p>Include action that requires the retention of new rock exposures of geological interest that are exposed during the construction of new roads or carriageways.</p>	<p>the Draft Plan to include reference to the County's geological heritage, and GSI be included in the list of key stakeholders in the Action relating to ET Policy 8.</p> <p>Acknowledged. <u>Recommendation</u> Amend ET10 Objective 3 of the Draft Plan be amended to include reference to the re-use of quarries</p> <p>Acknowledged. <u>Recommendation</u> Amend Section 11.3.8 of Chapter 11 of the Draft Plan to include reference to the GSI Guidelines</p> <p>Acknowledged. <u>Recommendation</u> Amend Section 3.4.6 and Table 3.5 of the Environmental Report to include the full list of Geological Sites and to change the heading to County GS.</p> <p>Acknowledged. Rock exposures of geological interest should be retained during the construction of new roads or carriageways where possible and appropriate.</p> <p>Section 2.1.4 of the NRAs Guidance Document ('Guidelines on Procedures for Assessment and Treatment of Geology, Hydrology and Hydrogeology for National Road Schemes') states <i>"For national road schemes, it is important to ensure that the best and potentially most valuable examples of our geological heritage are preserved and/or recorded, to simultaneously assist us in understanding the Earth's past and predicting its future."</i></p> <p>Adherence to the NRAs guidance document in relation to this should be carried out.</p> <p><u>Recommendation</u> Reference to the NRAs guidance document ('Guidelines on Procedures for</p>
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	Assessment and Treatment of Geology, Hydrology and Hydrogeology for National Road Schemes') in Chapter 11 to be included.
<p>Submission No. 4 Department of the Environment, Community and Local Government (DRAFTDEVPLAN0183)</p> <p>Core Strategy Submission notes that the Draft Plan includes Saggart/Citywest in the SDCC Settlement Strategy as a 'Moderate Sustainable Growth Town' (s.1.7.3), representing an addition to the GDA Settlement Strategy, proposed independently. Submission notes that preparation of the RSES will be undertaken by the Regional Assembly in conjunction with the constituent local authorities, and that any potential change to the Settlement Strategy at a regional level can appropriately be considered in this future statutory process for the RSES. Submission notes that in the interim, it is premature for South Dublin County Council to propose this designation as it is uncertain what its meaning is. Submission advises omission of the proposed designation of Saggart/Citywest as a 'Moderate Sustainable Growth Town' from the Draft South Dublin County Development Plan as it is not consistent with the Settlement Strategy (section 4.5) of the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 as required by the Planning & Development Act 2010.</p> <p>Flood Risk Management Submission notes that the Draft Plan is accompanied by a Strategic Flood Risk Assessment (SFRA) which is identified as a Stage 1 (Flood Risk Identification Report), and that in section 5.3.14 of this report, several specific areas of the county are recommended for a Stage 2 Flood Risk Assessment as greater detail is required in relation to flood risk – Clonburris, Hazelhatch, Fortunestown, Jobstown, Aungierstown & Ballybane, Baldonnel, Ballycullen & Oldcourt, Brittas, Greenogue, Lucan Village and New Nangor Road. Submission states that in accordance line with "The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)" it is considered that this Stage 2 Flood Risk Assessment is required to inform the proposed zoning of lands for</p>	<p>See main body of the Chief Executives Report for Response (Section 1.4.0 Core Strategy)</p> <p>See main body of the Chief Executives Report for Response (Section 7.3.0 Flood Risk Management)</p>

development in the Draft Plan. The submission states that this should include the provision of maps clearly overlaying proposed zoned lands with lands indicated as in Flood Zones A, B & C as per the Guidelines; the sequential approach in flood risk management (see Figure 3.1 of the Planning Guidelines), and where applicable the justification test, need to be applied to the zoning of lands for development.

Retailing

Submission notes that the Draft Plan proposes Firhouse, Knocklyon and Palmerstown as additional Level 3 District Centres for retailing. Submission notes the relevant Retail Strategy for the GDA 2008-16 does not designate the locations of Firhouse, Knocklyon and Palmerstown as Level 3 Centres (Town and/or district centre & sub-county town centres); therefore the Draft Plan is not consistent with the Retail Hierarchy of Table E1 of the Retail Strategy for the GDA 2008-16. In addition, submission notes that the retail function of these additional locations above would be out of line with the 3 existing Level 3 centres and their inclusion would adversely affect the promotion of retail development in the county in a strategic and structured manner. Submission therefore recommends removal of the proposed designations of Firhouse, Knocklyon and Palmerstown as Level 3 Retail Centres in the Retail Hierarchy (Section 5.2 and associated Table 5.2) from the Draft Plan as these designations are not consistent with the Retail Hierarchy (Table E1) of the Retail Strategy for the GDA 2008-16 as required by the Planning & Development Act 2010.

Submission notes that the Urban Hierarchy of the County Development Plan (Figure 5.2) differs from the Retail Hierarchy (Figure 5.3) in that Liffey Valley Shopping Centre is a designated Level 2 Centre in the Retail hierarchy but is not featured in the Urban Hierarchy. Submission notes that, in addition, Clondalkin is one of a number of Level 3 district retail centres (including Rathfarnham, Crumlin, etc) in the County Retail Strategy but is specified with its core retail area in Figure 5.5 (as for Tallaght and Liffey Valley, Level 2 Centres). Submission requests SDCC to provide a clearer rationale for the omission of Liffey Valley from the Urban Hierarchy and confirmation

See main body of the Chief Executives Report for Response (Section 5.2.0 Retailing)

See main body of the Chief Executives Report for Response (Section 5.2.0 Retailing)

that Clondalkin is a Level 3 Retail Centre albeit in the context of one of the County's two Town Centres.

Road and Street Network

Submission notes that Table 6.5 of the Plan lists the proposed road construction/works programme over the 6 year period of the Plan including proposals to provide access to the N4 (Esker Lane, Tandys Lane), N7 (Tay Lane) and M50 (Junction 8). The submission notes that the N4, N7 and M50 are designated national primary routes and proposals for design changes and/or access arrangements are a matter for the National Roads Authority (NRA), and that Section 2.6 of the Spatial Planning and National Roads Guidelines (2012) provides for the creation of new accesses onto national roads only in the context of a development plan preparation process subject to the specified approach detailing 'exceptional circumstances' in sections 2.6(1) & (2). Submission states that the Plan has not, as required by section 2.6 of the Spatial Planning and National Roads Guidelines, detailed the rationale for new access arrangements at the proposed locations in accordance with the requirements of the Guidelines, and the relevant access objectives have the potential to generate traffic impacting adversely on the operation of this National Road Infrastructure. Accordingly, the submission requires SDCC to remove the proposals regarding new accesses to National primary routes from Table 6.6 (pg.111) and any supporting text in the Draft Plan as it is not consistent with section 2.2 of the Spatial Planning and National Roads Guidelines and would be premature pending consultation and agreement with the National Roads Authority, and would thus send conflicting signals to the wider community and developers.

See main body of the Chief Executives Report for Response (Section 6.4.0 Road and Street Network)

SEA Specific Issues Raised in Non-Statutory Submissions

<p>Submission No. DRAFTDEVPLAN0212 AA and SEA Insert additional objective that requires development proposals in the vicinity or within built heritage sites to comply with AA and SEA requirements.</p>	<p>Noted. Section 11.8.0 (Environmental Assessment) details the specific requirements under the various Habitats and SEA Directives. Section 11.9.0 Development Management Thresholds will provide a list of thresholds for studies and assessments that arise out of Chapter 11 and the statutory requirements from the EU Directives for plans and projects will be detailed here for ease of reference.</p>
<p>Submission No. DRAFTDEVPLAN0225 Climate Change Adaptation Policy Draw up and publish Climate Change Adaptation Policy.</p>	<p>Acknowledged. Policy CS8 supports the implementation of the National Climate Change Strategy and the preparation of a Climate Change Adaptation Plan. The Climate Change Adaptation Plan is currently underway and is anticipated to be completed by 2016.</p>
<p>Submission No. DRAFTDEVPLAN0268 Protected species Amend HCL 15 Objective 2 (protected species) to reflect Precautionary Principle, Habitats Directive and ECJ Case 183/05.</p>	<p>Acknowledged. It is considered however that HCL15 Objective 2 already addresses the precautionary principle with reference to the principle of avoidance.</p>
<p>Submission No. DRAFTDEVPLAN0335 Include objective to co-operate with adjoining local authorities in the preparation of an Environmental Management Plan for the River Dodder and Environs.</p>	<p>Acknowledged. <u>Recommendation</u> Inclusion of an Action under Policy 2 (Chapter 7 Section 7.2.0) as follows:</p> <p><i>South Dublin County Council will co-operate with Dublin City Council and Dun Laoghaire Rathdown County Council in the preparation of an Environmental Management Plan for the River Dodder and its environs.</i></p>

Recommendation Summary

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

No	Chapter	Proposed Amendment
1	Chapter 4 Economic Development and Tourism	Amend Section 4.5.0, ET8 Objective 2 of the Draft County Development Plan to include reference to the County's geological heritage, and GSI be included in the list of key stakeholders in the Action relating to ET Policy 8.
2	Chapter 4 Economic Development and Tourism	Amend ET10 Objective 3 of the Draft Plan be amended to include reference to the re-use of quarries
3	Chapter 6 Traffic and Mobility	Inclusion of the following objectives: <i>Policy TM4 Objective 4</i> To ensure that all road and street networks proposals have regard to pertaining environmental conditions and sensitivities and incorporate appropriate avoidance and mitigation measures as part of any environmental assessments <i>Policy TM3 Objective 5</i> To ensure that all walking and cycling routes have regard to pertaining environmental conditions and sensitivities and incorporate appropriate avoidance and mitigation measures as part of any environmental assessments.
4	Chapter 7 Infrastructure and Water Quality	Inclusion of an Action under Policy 2 (Chapter 7 Section 7.2.0) as follows: <i>South Dublin County Council will co-operate with Dublin City Council and Dun Laoghaire Rathdown County Council in the preparation of an Environmental Management Plan for the River Dodder and its environs.</i>
5	Chapter 8 Green Infrastructure	Inclusion of objective to Policy G2 regarding placement of Green Infrastructure in existing hard infrastructure
6	Chapter 8 Green Infrastructure	Insert objectives relating to Invasive Species: <i>The Council will endeavour to prevent the loss of woodlands, hedgerows, aquatic habitats and wetlands wherever possible including requiring a programme to monitor and restrict the spread of invasive species such as those located along the River Dodder.</i> And <i>To seek to control and manage non-native invasive species on Council properties and to develop strategies with other stakeholders to assist in the control of these species throughout the County.</i>
7	Chapter 8 Green Infrastructure	Additional wording be added to the Action associated with Policy G1: <i>The objectives of the Green Infrastructure Strategy will be integrated throughout all relevant Council plans e.g. Local Area Plans, County Biodiversity Plan and other action plans'.</i>
8	Chapter 9 Heritage,	Amend HCL 9 Objective 3 to include reference to supporting the

	Conservation and Landscape	NPWS objective to expand the Wicklow Mountains National Park in the future
9	Chapter 9 Heritage, Conservation and Landscape	Update Table 9.7 of the Draft County Development Plan to include all 10 geological sites
10	Chapter 9 Heritage, Conservation and Landscape	Update text at the start of Section 9.7.0 to commence with <i>“Geology is recognised as an intrinsic component of the County’s heritage resource, to be protected and promoted for its heritage value and for its potential in educational, scientific, recreational, and geo-tourism initiatives”</i>
11	Chapter 11 Implementation	Amend Section 11.3.8 of Chapter 11 of the Draft Plan to include reference to the GSI Guidelines
12	Chapter 11 Implementation	Reference to the NRAs guidance document (‘Guidelines on Procedures for Assessment and Treatment of Geology, Hydrology and Hydrogeology for National Road Schemes’) in Chapter 11 to be included.
13	Environmental Report	Amend Section 3.3.4 of the ER to include reference to Brook Lamprey and rare flora along the Dodder.
14	Environmental Report	Amend SEO, indicators and targets for SEO B1 in the Environmental Report to omit “relevant” to avoid any confusion over same.
15	Environmental Report	Include Figure 3.18 (Environment Sensitivity Map) of the Environmental Report in the Non-Technical Summary of the Environmental Report
16	Environmental Report	Expand Section 3.7.8.2 of the Environmental Report to provide a more detailed summary of the initial Strategic Flood Risk Assessment
17	Environmental Report	Addition of text to Section 9.6 (Responsibility) of the Environmental Report: <i>“South Dublin County Council are responsible for the implementation of the SEA Monitoring Programme including</i> <ul style="list-style-type: none"> <i>○ Linking SEA monitoring output with the mid-term review of the Development Plan;</i> <i>○ Monitoring specific indicators and identifying any significant effects, including cumulative effects;</i> <i>○ Reviewing the effectiveness of monitoring/mitigation measures during the lifetime of the Plan; and</i> <i>○ Identifying any cumulative effects”</i>
18	Environmental Report	Update Section 7 of the Environmental Report regarding Cumulative Impacts
19	Environmental Report	Update Section 3.7.8 (Flooding) in relation to the cumulative impact of the flood protection projects on the Dodder
20	Screening for Appropriate Assessment Report	Amend the Screening Report for Appropriate Assessment to include reference to the Eastern and Midlands Regional Water Supply Project and the implications of same.

21	Screening for Appropriate Assessment Report	Amend Section 2 & 5 of the Screening for Appropriate Assessment Report to clarify the purpose and intention of the report
22	Screening for Appropriate Assessment Report	Amend the Screening for Appropriate Assessment Report to reflect the indicative route for the proposed bridge and to clarify the impacts on groundwater and further environmental assessments.
23	Screening for Appropriate Assessment Report	Amend Section 3.2 of the Screening for Appropriate Assessment document to include the up to date generic conservation objectives as detailed on www.npws.ie
24	Screening for Appropriate Assessment Report	Amend Section 3.4.6 and Table 3.5 of the Environmental Report to include the full list of Geological Sites and to change the heading to County Geological Sites
25	Mapping	Revert to an agricultural zoning ('RU') for the lands at Moneenalion Commons Upper. Amend Map 8 of the Draft Plan accordingly.

Next Stage in the SEA Process

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

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

APPENDIX B: NEWSPAPER NOTICE



NOTICE OF THE PREPARATION OF THE DRAFT SOUTH DUBLIN COUNTY COUNCIL DEVELOPMENT PLAN 2016-2022

Notice is hereby given, that South Dublin County Council, being the Planning Authority for the County has, pursuant to Section 12 of the Planning and Development Act, 2000 (as amended) prepared a Draft County Development Plan for the period 2016 to 2022.

The Draft Plan is accompanied by an Environmental Report, prepared in accordance with the Planning and Development [Strategic Environmental Assessment] Regulations 2004 and an Appropriate Assessment Screening, pursuant to Article 6 of the Habitats Directive 92/43/EEC.

The Draft Plan, (including the Environmental Report, Appropriate Assessment Screening, maps and accompanying documents) may be inspected and is available to purchase during normal opening hours at the following locations from 13 July 2015 to 24th September 2015 inclusive, Monday to Friday, excluding Bank Holidays:

- County Hall, Tallaght
- Civic Offices, Clondalkin

The documents may also be inspected at all branches of South Dublin County Libraries.

The Draft Plan, Environmental Report, Appropriate Assessment Screening and maps are available to view or download from the Council's website, www.southdublindevplan.ie from 13th July 2015.

Public Information Days:

Public information days when staff are available to answer questions and assist in making a submission are on the dates and at the locations listed below:

Venue	Date	Time	Date	Time
Tallaght Library	Tues 28 July	10-1.00pm	Wed 2 Sep	5-8.00pm
Ballyroan Library, Rathfarnham	Wed 29 July	5-8.00pm	Thur 3 Sep	10-1.00pm
Lucan Library	Thur 30 July	10-1.00pm	Tues 8 Sep	5-8.00pm
Rathcoole Community Centre	Tues 11 Aug	5-8.00pm		
Palmerstown Community Centre	Wed 12 Aug	10-1.00pm		
Clondalkin Civic Offices	Thurs 13 Aug	10-1.00pm		
St Finian's Community Centre, Newcastle	Tues 1 Sep	5-8.00pm		
Perrystown Community Centre	Wed 9 Sep	10-1.00pm		
Clondalkin Library	Thurs 10 Sep	5-8.00pm		

Planning staff are available to answer questions every Wednesday afternoon between 2.00pm-4.00pm in South Dublin County Council Offices, Tallaght, throughout the public consultation.

Submissions/observations may be made on or before 5.00pm 24 September 2015 (12.00 midnight if made online) as follows:-

- Online at www.southdublindevplan.ie
- In writing to Senior Executive Officer, Land Use Planning & Transport Department, County Hall, Tallaght

NOTE: Please make your submission by one medium only. As an online facility has been provided for your convenience, e-mail submissions will not be accepted. All submissions should include your name and a contact address, a map (where appropriate) and, where relevant, details of any organisation, community group or company etc., which you represent.

Submissions and observations will be taken into consideration before the making of the Plan.

PLEASE NOTE:

YOU ARE STRONGLY ADVISED TO MAKE YOUR SUBMISSION AS EARLY AS POSSIBLE.

CLOSING DATE FOR SUBMISSIONS: 24 September 2015.

LATE SUBMISSIONS WILL NOT BE ACCEPTED.

Eddie Taaffe, Director of Services

Web: www.sdcc.ie



APPENDIX C: PUBLIC CONSULTATION SESSIONS

