



## **SOUTH DUBLIN COUNTY COUNCIL DRAFT DEVELOPMENT PLAN 2016-2022**

### **CHIEF EXECUTIVE'S REPORT: PUBLIC CONSULTATION ON PROPOSED MATERIAL ALTERATIONS & ENVIRONMENTAL REPORT (ADDENDUM 2)**

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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 proposed Material Alterations to the South Dublin County Council Draft Development Plan 2016-2022 was given on Thursday 25<sup>th</sup> February 2016. Submissions or observations with regard to the proposed Material Alterations and/or the Environmental Report (Addendum 2) only were invited for a period of just over 4 weeks from Thursday 25<sup>th</sup> February 2016 to Tuesday 29<sup>th</sup> March 2016 inclusive. Details of the public consultation programme are set out in Section 0.2 of this Report.

Pursuant to Section 12(8)(b) of the Planning and Development Act 2000 (as amended), this Chief Executive's Report provides details of submissions and observations received in relation to the proposed Material Alterations as follows:

- Lists the persons or bodies who made submissions or observations during the prescribed public consultation period;
- Summarises the issues raised by the persons or bodies under the submissions or observations received during the prescribed public consultation period;
- Gives the response of the Chief Executive to the issues raised, taking account of:
  - 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
  - any relevant policies or objectives of the Government or of any Minister of the Government.

This Chief Executive's Report on submissions or observations received in relation to the proposed Material Alterations to the Draft Development Plan is hereby submitted to the members of the Planning Authority for consideration. Details in relation to the next steps in the plan making process are provided in Section 0.4 of this report.

## **0.1.1 Strategic Environmental Assessment (SEA) & Appropriate Assessment**

In accordance with Section 12(7)(aa) of the Planning and Development Act 2000 (as amended), the Chief Executive made a determination prior to going out on public display that a Strategic Environmental Assessment and Appropriate Assessment were not required to be carried out for the Proposed Material Alterations.

### *Strategic Environmental Assessment*

An Environmental Report (Addendum II), which contained a detailed analysis of the Proposed Material Alterations and how their implementation would impact on its receiving environment, accompanied the Proposed Material Alterations to the Draft County Development Plan.

A report has been prepared on the environmental implications of the public submissions on the proposed Material Alterations to the Draft South Dublin County Development Plan 2016-2022. This environmental assessment deals with issues contained within public submissions which relate to the environmental concerns raised within the Environmental Report (Addendum II).

### *Appropriate Assessment (AA)*

In accordance with requirements under EU Habitats Directive (92/43/EEC) and Section 177 (Part XAB) of the Planning and Development Act 2000 (as amended), modifications proposed to Material Alterations under 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 proposed modifications, alone and in combination with other plans and projects including the Draft County Development Plan, would not have any significant effect on any Natura 2000 sites.'

The public submissions were also assessed for possible impact on the outcome of the screening process of the proposed Material Alterations for Appropriate Assessment under the requirements of the Habitats Directive. It was deemed that the public submissions, if adopted, would not have a negative impact on protected Natura 2000 sites both within and downstream of the County.

## 0.2.0 OVERVIEW OF CONSULTATION

Having carried out Pre-Draft Public Consultation between September and October 2014 and Draft Plan Consultation between July and September 2015, consultation on the proposed Material Alterations to the Draft Development Plan marked Stage 3 in the review of the County Development Plan. The key actions in the review process including those carried out under each stage (shown in faded grey text) are summarised in Figure 1 below.

**Figure 1: Summary of County Development Plan Review Process to Date**

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

## 0.2.1 Consultation on proposed Material Alterations

Consultation on the proposed Material Alterations to the South Dublin County Council Draft Development Plan 2016-2022 and the Environmental Report (Addendum 2) was carried out for a period of just over 4 weeks from Thursday 25<sup>th</sup> February 2016 to Tuesday 29<sup>th</sup> March 2016 inclusive. The key elements of the consultation programme are set out below:

- Notices of the proposed Material Alterations to the Draft County Development plan were published in the *Irish Times* and *Tallaght Echo* on Thursday 25<sup>th</sup> February 2016 (see Appendix A). The notices included information on how to make a submission on the proposed Material Alterations and Environmental Report (Addendum 2) together with information on their display. A press release was also issued via the Council's Website.
- Notices of the proposed Material Alterations together with information on public consultation were posted to prescribed bodies and to all those persons and bodies that made submissions during the previous pre-draft and draft plan consultation stages of the County Development Plan review.
- Public displays were placed at County Hall Tallaght, Civic Offices Clondalkin and at all Council libraries. Display material included the proposed Material Alterations (written statement and maps), the Environmental Report (Addendum 2) and the AA Screening Report together with accompanying documents on flood risk, protected structures and architectural conservation areas.
- The dedicated website created to host information on the County Development Plan Review [www.southdublindevplan.ie](http://www.southdublindevplan.ie) included details of the consultation on the proposed Material Alterations including information on how to make a submission by post or via an online submission system. All display material on the proposed Material Alterations was uploaded to the website together with a promotional video that encouraged persons and bodies to make submissions.
- Council staff were made available every Wednesday afternoon to answer queries from members of the public at County Hall, Tallaght. Additional queries were taken at the planning counter in County Hall, by e-mail and by phone.
- Notice of the proposed Material Alterations were placed on the South Dublin County Council main webpage [www.sdcc.ie](http://www.sdcc.ie) and updates were also issued via South Dublin County Council's social media accounts.

### 0.3.0 CONSULTATION OUTCOME

A total of 96 submissions and observations were received during the prescribed public consultation period. An additional 2 submissions and observations were received after the prescribed deadline and are excluded from the remainder of this report.

A list of all the persons/bodies that made submissions or observations 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.

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	Rebuild the Silver Bridge		<a href="#">PMADRAFTDEVPLAN0001</a>
Fiona Farrell			<a href="#">PMADRAFTDEVPLAN0002</a>
Shane O'Brien			<a href="#">PMADRAFTDEVPLAN0003</a>
Connie Larkin			<a href="#">PMADRAFTDEVPLAN0004</a>
Anthony Wall			<a href="#">PMADRAFTDEVPLAN0005</a>
Fintan Moore	Green Park Pharmacy		<a href="#">PMADRAFTDEVPLAN0006</a>
Margaret McPartlan			<a href="#">PMADRAFTDEVPLAN0007</a>
Michele Uí Bhuachalla			<a href="#">PMADRAFTDEVPLAN0008</a>
Yvonne Stobie			<a href="#">PMADRAFTDEVPLAN0009</a>
Brian Gilmore	Cement Manufacturers Ireland		<a href="#">PMADRAFTDEVPLAN0010</a>
Lara Gough	EirGrid		<a href="#">PMADRAFTDEVPLAN0011</a>
Shane O'Keeffe			<a href="#">PMADRAFTDEVPLAN0012</a>
Richard Butler	Cunnane Stratton Reynolds	Edward and Joan Fox	<a href="#">PMADRAFTDEVPLAN0013</a>
Iris Murray			<a href="#">PMADRAFTDEVPLAN0014</a>
Declan Hanley			<a href="#">PMADRAFTDEVPLAN0015</a>
Thomas Rossiter			<a href="#">PMADRAFTDEVPLAN0016</a>
Sean Boylan			<a href="#">PMADRAFTDEVPLAN0017</a>
Ronan Dunne			<a href="#">PMADRAFTDEVPLAN0018</a>
Sean Treanor			<a href="#">PMADRAFTDEVPLAN0019</a>
Graham Horgan			<a href="#">PMADRAFTDEVPLAN0020</a>
Nathalie Dowling	Lucan Autism Network		<a href="#">PMADRAFTDEVPLAN0021</a>
Nicola Dunne			<a href="#">PMADRAFTDEVPLAN0022</a>
Caragh Coote			<a href="#">PMADRAFTDEVPLAN0023</a>
Jean Redmond			<a href="#">PMADRAFTDEVPLAN0024</a>
Nathalie Dowling	Lucan Autism Network		<a href="#">PMADRAFTDEVPLAN0025</a>
Brendan Lynch			<a href="#">PMADRAFTDEVPLAN0026</a>
David Galvin	Environmental Protection Agency		<a href="#">PMADRAFTDEVPLAN0027</a>
Hugh Lynn	Davy Hickey Properties		<a href="#">PMADRAFTDEVPLAN0028</a>
Frances Fitzgerald TD, Minister	Minister Frances Fitzgerald TD		<a href="#">PMADRAFTDEVPLAN0029</a>
Tara Spain	Transport Infrastructure Ireland		<a href="#">PMADRAFTDEVPLAN0030</a>
Olwyn James	Irish Water		<a href="#">PMADRAFTDEVPLAN0031</a>
Ian McGrandles	IMG Planning Limited	Vanmer Limited	<a href="#">PMADRAFTDEVPLAN0032</a>
Tara Cowley	DAA		<a href="#">PMADRAFTDEVPLAN0033</a>
Frank O'Connor			<a href="#">PMADRAFTDEVPLAN0034</a>
Pat Nolan			<a href="#">PMADRAFTDEVPLAN0035</a>
Donal and Margaret Bergin			<a href="#">PMADRAFTDEVPLAN0036</a>

Person	Company (if applicable)	Body/Person(s) Represented (if applicable)	Ref
Padraig McGarrigle	Ardeevin Residents Association		<a href="#">PMADRAFTDEVPLAN0037</a>
Catherine Handley			<a href="#">PMADRAFTDEVPLAN0038</a>
Martin Cunningham			<a href="#">PMADRAFTDEVPLAN0039</a>
Mark Feeney			<a href="#">PMADRAFTDEVPLAN0040</a>
Mary Costello			<a href="#">PMADRAFTDEVPLAN0041</a>
Elaine Horgan			<a href="#">PMADRAFTDEVPLAN0042</a>
Pat O'Boyle			<a href="#">PMADRAFTDEVPLAN0043</a>
Matthew McRedmond	Brock McClure Planning & Development Consultants	Outdoor Works	<a href="#">PMADRAFTDEVPLAN0044</a>
David Cruise	David Cruise & Co.		<a href="#">PMADRAFTDEVPLAN0045</a>
Sinead Curran			<a href="#">PMADRAFTDEVPLAN0046</a>
John Coleman	Finnstown Priory / Cloisters Residents Association		<a href="#">PMADRAFTDEVPLAN0047</a>
Debbie Brennan	PCI College		<a href="#">PMADRAFTDEVPLAN0048</a>
Jim Egan	Hughes Planning and Development Consultants	Health Service Executive	<a href="#">PMADRAFTDEVPLAN0049</a>
Aoife Byrne	SLR Consulting Ireland Limited		<a href="#">PMADRAFTDEVPLAN0050</a>
Anthony Marston	Marston Planning Consultancy	Sruteen Community Development Association	<a href="#">PMADRAFTDEVPLAN0051</a>
Jeff Colley	Temple Media Ltd (trading as Passive House Plus)		<a href="#">PMADRAFTDEVPLAN0052</a>
Frederick Kinahan			<a href="#">PMADRAFTDEVPLAN0053</a>
Mairead Forsythe	Dublin Cycling Campaign		<a href="#">PMADRAFTDEVPLAN0054</a>
Robert McLoughlin	Bilfinger GVA	Hines Real Estate Ireland Limited	<a href="#">PMADRAFTDEVPLAN0055</a>
Jamie Moore	Planning Linkage Group - South Dublin County Public Participation Network		<a href="#">PMADRAFTDEVPLAN0056</a>
Noel Smyth	Fitzwilliam Real Estate Capital Ltd		<a href="#">PMADRAFTDEVPLAN0057</a>
Robert McLoughlin	Bilfinger GVA	Tesco Ireland Limited	<a href="#">PMADRAFTDEVPLAN0058</a>
Niamh O'Reilly			<a href="#">PMADRAFTDEVPLAN0059</a>
Robert Keran	John Spain Associates	Peamount Healthcare	<a href="#">PMADRAFTDEVPLAN0060</a>
Noel Smyth	Fitzwilliam Real Estate Capital Ltd	Trustees & Sisters of the Carmelite Monastery	<a href="#">PMADRAFTDEVPLAN0061</a>
Arthur O'Donnell			<a href="#">PMADRAFTDEVPLAN0062</a>
Shane Colclough	Passive House Association of Ireland		<a href="#">PMADRAFTDEVPLAN0063</a>
Niall O Byrne	New Generation Homes		<a href="#">PMADRAFTDEVPLAN0064</a>
Tomás O'Leary	Passive House Academy		<a href="#">PMADRAFTDEVPLAN0065</a>
Noeleen Buggy			<a href="#">PMADRAFTDEVPLAN0066</a>
John Agar			<a href="#">PMADRAFTDEVPLAN0067</a>
Veronica Edward Toolis			<a href="#">PMADRAFTDEVPLAN0068</a>
Martin Ryan			<a href="#">PMADRAFTDEVPLAN0069</a>
Tom Newton	Lucan Planning Council		<a href="#">PMADRAFTDEVPLAN0070</a>
Eoin O'Cofaigh	McHugh O'Cofaigh	Thomas Davis GAA Club	<a href="#">PMADRAFTDEVPLAN0071</a>
John Spain & Associates	John Spain & Associates	Peamount Healthcare	<a href="#">PMADRAFTDEVPLAN0072</a>
John Spain & Associates	John Spain & Associates	MLEU Dublin Ltd	<a href="#">PMADRAFTDEVPLAN0073</a>
Bridget Ryan		Sruteen Community Dev. Assoc.	<a href="#">PMADRAFTDEVPLAN0074</a>
Paul Byrne			<a href="#">PMADRAFTDEVPLAN0075</a>
BMA Planning	BMA Planning	Wilson Auctioneers	<a href="#">PMADRAFTDEVPLAN0076</a>
Mary Connor			<a href="#">PMADRAFTDEVPLAN0077</a>
Edmondstown Golf Club	Edmondstown Golf Club		<a href="#">PMADRAFTDEVPLAN0078</a>
Richie Geoghegan			<a href="#">PMADRAFTDEVPLAN0079</a>
Fiona Farrell			<a href="#">PMADRAFTDEVPLAN0080</a>

Person	Company (if applicable)	Body/Person(s) Represented (if applicable)	Ref
Melissa McGuire			<a href="#">PMADRAFTDEVPLAN0081</a>
Michael Murphy	Dept. of Arts, Heritage and the Gaeltacht		<a href="#">PMADRAFTDEVPLAN0082</a>
Stephen M. Purcell	Future Analytics	Weston Aviation Aerodrome	<a href="#">PMADRAFTDEVPLAN0083</a>
Kay Ryan			<a href="#">PMADRAFTDEVPLAN0084</a>
Tara Spain	Transport Infrastructure Irl		<a href="#">PMADRAFTDEVPLAN0085</a>
Julie Kilroy		Knocklyon Network	<a href="#">PMADRAFTDEVPLAN0086</a>
Martin Maher		Serdigo (Clondalkin) Ltd.	<a href="#">PMADRAFTDEVPLAN0087</a>
Roger Garland		Keep Ireland Open	<a href="#">PMADRAFTDEVPLAN0088</a>
Anne Flynn	Department of Education & Skills		<a href="#">PMADRAFTDEVPLAN0089</a>
Ciara Gilgunn	Department of Environment, Community and Local Government		<a href="#">PMADRAFTDEVPLAN0090</a>
Geraldine O'Reilly			<a href="#">PMADRAFTDEVPLAN0092</a>
Stephen O'Reilly			<a href="#">PMADRAFTDEVPLAN0093</a>
Hugh Lynn			<a href="#">PMADRAFTDEVPLAN0094</a>
Martin Ryan			<a href="#">PMADRAFTDEVPLAN0095</a>
Tom Newton		Lucan Planning Council	<a href="#">PMADRAFTDEVPLAN0096</a>
Eoin Dunphy	McHugh O'Cofaigh	Thomas Davis GAA Club	<a href="#">PMADRAFTDEVPLAN0097</a>

#### **0.4.0 NEXT STEPS**

##### **0.4.1 Timeframe**

The Elected Members have up to 6 weeks to consider this Chief Executive's Report in combination with the proposed Material Alterations to South Dublin County Council Draft Development Plan 2016 – 2022.

Special Development Plan Meetings of South Dublin County Council will be held on 16<sup>th</sup> and 17<sup>th</sup> May 2016 and, if required, on the 19<sup>th</sup> May 2016. Pursuant to Section 12(17) of the Planning and Development Act 2000 (as amended), a development plan made under this section shall have effect 4 weeks from the day that it is made.

##### **0.4.2 Consideration of Chief Executive's Report & Draft Plan**

Pursuant to Sections 12(9) and 12(10) of the Planning and Development Act 2000 (as amended), following consideration of the proposed Material Alterations to the Draft Development Plan and the Chief Executive's Report, the Members shall, by resolution, make the Development Plan with or without the proposed Material Alterations except where it is decided to make a modification to a proposed Material Alteration where it is considered appropriate.

A further modification to a proposed Material Alteration may be made where;

- it is minor in nature, and
- therefore not likely to have significant effects on the environment or adversely affect the integrity of a European site

A further modification to a proposed Material Alteration shall not be made where it relates to:

- an increase in the area of land zoned for any purpose, or
- an addition to or deletion from the Record of Protected Structures

##### **0.4.3 Making of Development Plan**

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.

Within the context of the above, it is advised that Sections 28(1) of the Planning and Development Act 2000 (as amended), states that a planning authority shall consider the policies and objectives of the Minister contained in guidelines issued under Section 28, which may include specific planning requirements, when making a development plan. It is also a requirement to append a statement to the Development Plan in relation to (inter alia) how the planning authority has implemented the policies and objectives contained in such guidelines.

Section 34(2) of the Planning and Development Act 2000 (as amended), which relates to the making a decision on a planning application by a planning authority, also states that where any requirements of Ministerial Guidelines differ from the provisions of a development plan, then the provisions of the Ministerial Guidelines, to the extent that they so differ, shall apply.



## 0.5.0 SUBMISSIONS & RECOMMENDATIONS ON PROPOSED MATERIAL ALTERATIONS

Of the 96 submissions and observations received during the prescribed public consultation period, a total of 144 issues were identified in relation to 63 of the proposed Material Alterations and 7 issues were identified in relation to the Environmental Report (Addendum 2) and the Appropriate Assessment Screening Report.

A further 32 issues were identified in relation to matters not relevant to the proposed Material Alterations and, pursuant to Sections 12(9) and 12(10) of the Planning and Development Act 2000 (as amended), cannot be considered at this stage of the plan making process.

Table 2 below sets out the number of times that issues were raised in submissions in relation to each of the proposed Material Alterations etc. Full summaries, responses and recommendations in relation to the issues raised are also set out in Section 0.5.4 of this report. Recommendations made in relation to 2 of the 63 proposed Material Alterations raised in submissions also affect 3 additional proposed Material Alterations to the Draft County Development Plan Maps that were not directly subject to submissions.

In summary, this report recommends that the Development Plan:

- be made with 47 of the proposed Material Alterations as displayed;
- be made with 15 of the proposed Material Alterations as displayed subject to modification;
- be made without 4 of the proposed Material Alterations as displayed.

### 0.5.1 Recommended Modifications to Proposed Material Alterations

Proposed Material Alterations are repeated in Section 0.5.4 of this report in cases where there is a recommendation to modify a proposed Material Alteration. Proposed Material Alterations to the Draft Plan, as originally displayed in February 2016, are identified through the use of **green print** for **additional text**, **deletions** to text are shown in ~~red print with strikethrough~~, and any text **relocated** within the Draft Plan is identified through the use of **blue print**.

In terms of modifications to proposed Material Alterations, as recommended under this report, the omission of any text from a proposed Material Alterations is shown in its original colour text as displayed with strikethrough, with any modifications in the form of additional text to the proposed Material Alterations shown in **bold green print**, for example:

**E2 Objective 6:**

**To ensure promote, where feasibly practical and viable, the provision of green roofs and/or solar panels or a mix of the two for all new public buildings (school buildings, hospitals, community centres, sports facilities, libraries and Garda stations etc.),**  
~~include green roofs and/or solar panels or a mix of the two for flood alleviation, insulation and the supply of low carbon renewable energy and/or heating alternatives, and to actively promote these measures where appropriate in new commercial and industrial buildings.~~

### 0.5.2 Proposed Material Alterations Not Subject to Submissions or Observations

As indicated above, a total of 63 proposed Material Alterations were the subject of submissions. Recommendations in relation to each of these proposed Material Alterations are contained in this report together with recommendations in relation to 3 further associated Material Alterations that are affected.

This leaves a large number of proposed Material Alterations that were not subject to submissions/observations and are not affected by recommendations. Such proposed Material Alterations will each be adopted as displayed unless, by resolution, the Members make the Development Plan without such proposed Material Alterations or modify such proposed Material Alterations.

Tables that identify proposed Material Alterations that are subject to recommendations contained in this report and proposed Material Alterations that were not subject to any submissions or observations, including those affected by associated recommendations, are set out in Appendix B of this report.

**Table 2: Breakdown of Issues Raised in Submissions/Observations According to Issue**

<b>Proposed Material Alteration</b>	<b>No. of Times Issue Raised in Submissions</b>	<b>% of Total</b>
<b>Chapter 1 Introduction &amp; Core Strategy</b>		
Material Alteration Ref. Chapter 1 - No.3	1	0.54%
Material Alteration Ref. Chapter 1 - No.7	1	0.54%
Material Alteration Ref. Chapter 1 - No.8	1	0.54%
Material Alteration Ref. Chapter 1 - No.9	1	0.54%
<b>Chapter 2 Housing</b>		
Material Alteration Ref. Chapter 2 - No.1	1	0.54%
Material Alteration Ref. Chapter 2 - No.3	5	2.72%
Material Alteration Ref. Chapter 2 - No.4	3	1.63%
Material Alteration Ref. Chapter 2 - No.5	3	1.63%
<b>Chapter 3 Community Infrastructure</b>		
Material Alteration Ref. Chapter 3 - No.3	1	0.54%
Material Alteration Ref. Chapter 3 - No.4	1	0.54%
<b>Chapter 4 Economic Development &amp; Tourism</b>		
Material Alteration Ref. Chapter 4 - No.3	3	1.63%
Material Alteration Ref. Chapter 4 - No.4	3	1.63%
Material Alteration Ref. Chapter 4 - No.5	2	1.09%
Material Alteration Ref. Chapter 4 - No.6	2	1.09%
Material Alteration Ref. Chapter 4 - No.7	1	0.54%
Material Alteration Ref. Chapter 4 - No.9	1	0.54%
<b>Chapter 5 Urban Centres and Retailing</b>		
Material Alteration Ref. Chapter 5 - No.1	1	0.54%
Material Alteration Ref. Chapter 5 - No.3	1	0.54%
Material Alteration Ref. Chapter 5 - No.8	2	1.09%
<b>Chapter 6 Transport &amp; Mobility</b>		
Material Alteration Ref. Chapter 6 - No.1	1	0.54%
Material Alteration Ref. Chapter 6 - No.2	2	1.09%
Material Alteration Ref. Chapter 6 - No.3	3	1.63%
Material Alteration Ref. Chapter 6 - No.4	7	3.8%
Material Alteration Ref. Chapter 6 - No.5	2	1.09%
Material Alteration Ref. Chapter 6 - No.6	1	0.54%
Material Alteration Ref. Chapter 6 - No.7	6	3.26%
Material Alteration Ref. Chapter 6 - No.8	1	0.54%
Material Alteration Ref. Chapter 6 - No.9	1	0.54%
<b>Chapter 7 Infrastructure &amp; Environmental Quality</b>		
Material Alteration Ref. Chapter 7 - No.4	1	0.54%
Material Alteration Ref. Chapter 7 - No.5	1	0.54%
Material Alteration Ref. Chapter 7 - No.8	2	1.09%
Material Alteration Ref. Chapter 7 - No.12	1	0.54%
Material Alteration Ref. Chapter 7 - No.13	1	0.54%
<b>Chapter 8 Green Infrastructure</b>		
Material Alteration Ref. Chapter 8 - No.2	1	0.54%

<b>Proposed Material Alteration</b>	<b>No. of Times Issue Raised in Submissions</b>	<b>% of Total</b>
Material Alteration Ref. Chapter 8 - No.4	2	1.09%
<b>Chapter 9 Heritage, Conservation &amp; Landscapes</b>		
Material Alteration Ref. Chapter 9 - No.1	1	0.54%
Material Alteration Ref. Chapter 9 - No.2	1	0.54%
Material Alteration Ref. Chapter 9 - No.5	1	0.54%
Material Alteration Ref. Chapter 9 - No.6	1	0.54%
Material Alteration Ref. Chapter 9 - No.8	3	1.63%
Material Alteration Ref. Chapter 9 - No.10	1	0.54%
Material Alteration Ref. Chapter 9 - No.11	1	0.54%
Material Alteration Ref. Chapter 9 - No.12	3	1.63%
<b>Chapter 10 Energy</b>		
Material Alteration Ref. Chapter 10 - No.2	1	0.54%
Material Alteration Ref. Chapter 10 - No.3	4	2.17%
Material Alteration Ref. Chapter 10 - No.4	1	0.54%
Material Alteration Ref. Chapter 10 - No.8	3	1.63%
<b>Chapter 11 Implementation</b>		
Material Alteration Ref Chapter 11 - Zoning Tables - No. 1	2	1.09%
Material Alteration Ref. Chapter 11 - No.1	2	1.09%
Material Alteration Ref. Chapter 11 - No.2	2	1.09%
Material Alteration Ref. Chapter 11 - No.6	2	1.09%
Material Alteration Ref. Chapter 11 - No.7	2	1.09%
Material Alteration Ref. Chapter 11 - No.9	2	1.09%
Material Alteration Ref. Chapter 11 - No.11	2	1.09%
Material Alteration Ref. Chapter 11 - No.12	1	0.54%
Material Alteration Ref. Chapter 11 - No.18	1	0.54%
<b>Schedule 3 Interim Housing Strategy</b>		
Material Alteration Ref. Schedule 3 - No. 1	1	0.54%
<b>Schedule 5 Land Use Definitions &amp; Zoning Matrix</b>		
Material Alteration Ref. Schedule 5 - No. 2	1	0.54%
<b>County Development Plan Maps</b>		
MA.M10	1	0.54%
MA.M12	31	16.85%
MA.M13	2	1.09%
MA.C6-07.c	3	1.63%
MA.C7-08	1	0.54%
<b>Accompanying Document -</b>		
Environmental Report (Addendum 2)	6	3.26%
<b>Accompanying Documents -</b>		
Appropriate Assessment Screening Report	1	0.54%
<b>Other</b>		
Issue(s)Not Related to Material Alterations	32	17.39%

### 0.5.3 Submission from the Minister for the Environment, Community and Local Government ([PMADRAFTDEVPLAN0090](#))

In view of its strategic nature and in the interest of consistency with previous Chief Executives Reports that were prepared during the plan making process, the submission of the Minister for the Environment, Community and Local Government is summarised separately below together with the response and recommendations of the Chief Executive.

The summaries, responses and recommendations are also incorporated with all other summarise, responses and recommendations under the relevant headings in Section 0.5.2 of this report.

#### **Submission Summary: Material Alteration Ref. Chapter 1 - No.3**

The submission of the Department of the Environment, Community and Local Government notes that the proposed Material Alterations do not include the deletion of the designation of Saggart/Citywest as a 'Moderate Sustainable Growth Town' as advised in their submission on the 24th September 2015. It is advised that Moderate Sustainable Growth Towns within the Metropolitan Areas are typically located within an edge of urban context and are served by heavy rail corridors.

Saggart/Citywest is located in close proximity to the Metropolitan Consolidation Towns of Tallaght, Clondalkin and Lucan and its designation as a Moderate Sustainable Growth Town does not align well with the intended role of a Moderate Sustainable Growth Town. This runs the risk of undermining the Metropolitan Consolidation Towns.

The designation of Saggart/Citywest is not in compliance with the Settlement Strategy of the Regional Planning Guidelines and should be removed to ensure that the Plan is in accordance with statutory requirements.

The Core Strategy could, however, still reflect the role of Saggart/Citywest as an urban area within the Metropolitan Area.

#### Chief Executive's Response and Recommendation

The subject proposed Material Alteration relates to the calculation of residential capacity in the County under table 1.8 of the Draft Plan according to an identified settlement hierarchy.

It is accepted that the designation of Saggart-Citywest as a "Moderate Sustainable Growth Town" could be considered to be premature pending the review of the Regional Planning Guidelines for the Greater Dublin Area 2010-2022.

Given that 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 and that its population exceeds that of a "Small Town", it is recommended that the proposed Material Alteration be modified with an interim designation for Saggart-Citywest that is akin to a Moderate Sustainable Growth Town. It is considered that this would be consistent with the settlement typologies identified under the Regional Planning Guidelines for the Greater Dublin Area 2010-2022.

Such an interim designation would also acknowledge 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 an "Emerging Moderate Sustainable Growth Town" designation would appropriately reflect the settlement's

capacity to provide for further sustainable housing growth that is linked to economic expansion, retail offer and public transport accessibility.

It is therefore recommended that County Development Plan be made with the proposed material alteration subject to modification.

Recommendation: It is recommended that the County Development Plan be made with the proposed Material Alteration as displayed subject to the following modification: Modify the “Moderate Sustainable Growth Town” Designation of Saggart – Citywest by removing the Moderate Sustainable Growth Town heading/designation and replacing it with an “**Emerging Moderate Sustainable Growth Town**” designation in the left hand column of Table 1.8 and in all other Cores Strategy tables, maps and associated text.

#### **Submission Summary: Material Alteration Ref. Chapter 11 - No.2**

The submission of the Department of the Environment, Community and Local Government notes the proposed changes to Tables 11.2.0 and 11.21 (minimum space standards for houses and apartments), which result in an increase of 15 sq.m in all cases for houses and apartments in the absence of evidence based qualitative or quantitative assessment. It is strongly advised that the proposed changes, which deviate from national standards, are removed and should not be adopted.

The Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2015) specify minimum apartment standards. The proposed Material Alterations to Table 11.21 (min. apartment sizes) are substantially in excess of the minimum standards specified under the Section 28 Ministerial guidelines.

Planning and Development Legislation requires planning authorities to consider Section 28 guidelines in the consideration of planning applications and, where such guidelines differ from the provisions of a development plan, the guidelines shall prevail and take precedence making the proposed materials alterations in relation to apartment sizes redundant.

The proposed material alterations to Table 11.20 (min. house sizes) also substantially exceed the minimum standards detailed in Quality Housing for Sustainable communities (2007). Within this context, housing construction activity in Dublin is less than half that required to meet demand thus increasing pressure on social housing. Additional requirements over and above the prescribed minimum standards should therefore not be adopted in the absence of evidence based impact analysis.

One of the most significant factors impeding additional housing supply is the low marginal returns from new housing construction, which are influenced by the cost of construction. Unless viability of construction improves it will be likely that demand normally met by the private housing market will be placed on the private rental and social housing sectors. Planning authorities must therefore ensure that new construction is of good quality and is affordable.

#### Chief Executive's Response and Recommendation

##### *Housing standards*

The minimum standards contained within Table 11.20 of the Draft Plan for houses are based on the *Quality Housing for Sustainable Communities Guidelines, Department of Community Heritage and Local Government, 2007*. The minimum standards contained within the Draft Plan match or exceed the ‘target gross floor area’ for two storey houses contained within the Guidelines. These standards were determined via a process that examined the size of individual living spaces in terms of:

- the normal range, and typical arrangement of, furniture for each room;
- a reasonable degree of freedom of circulation, appropriate to the likely activities;
- the movement of larger items of furniture into and between rooms; space for family gatherings, including occasional visitors; working area and storage facilities appropriate to the likely activities; door swings which do not interfere with other doors, furniture or circulation routes; and

- the location of heating radiators and other service fittings in a way that does not limit the arrangement of furniture within a room.

Increasing the minimum floor area for houses raises a number of concerns in relation to:

- **Cost:** The increase in construction costs will inevitably be passed onto buyers. This is a particularly poignant concern given the current 'housing crisis' which is, in part, linked to construction costs and limitations on consumer borrowing.
- **Delivery of Social Housing:** The increase in housing size (and associated costs) will impact on the ability of South Dublin Council to deliver its Social Housing program. As noted above this is a poignant concern in the current socio-economic climate.
- **Delivery of Specialist Housing:** There are a number of housing tenures for which the increase in dwelling size is inappropriate. For example the occupants of elderly housing would not have the need for, or the ability to maintain, larger houses. Similar concerns would be raised in relation to student housing, sheltered housing and other forms of housing designed to cater for a short to medium term tenure.
- **Sustainability and Competitiveness:** The additional cost associated with building homes would make the county less competitive in the housing market. Developers (and subsequently buyers) could be attracted to adjoining counties outside metropolitan Dublin, contributing to less sustainable travel patterns as commuters face longer journey times into the city centre from less accessible locations.
- **Variety:** The range of house sizes available within any scheme will narrow (i.e. from smallest to largest) resulting in less variety and a more standardised approach to housing provision.
- **Evidence Base:** The proposed 15 sq.m increase is not based on a quantitative or qualitative assessment and directly contradicts well researched national guidelines. As a result the proposed standards are highly susceptible to challenge (and unlikely to withstand the rigour of an appeal to An Bord Pleanála).
- **Balance and Efficiency:** The proposed 15 sq.m increase is disproportionately applied to all house types, notwithstanding the number of bedrooms. This would exceed basic amenity requirements in smaller house types (i.e. one and two bedroom) and could be better allocated toward an additional bedroom.

Notwithstanding the above, concerns would be raised where all or a high proportion of houses were proposed at the minimum standard. The Draft Plan addresses this via Section 11.3.1 as follows:

*'The overall dwelling mix in residential schemes should provide for a balanced range of dwelling types and sizes to support a variety of household types'.*

and

*'All houses must be required to accord with or exceed the minimum floor area standards set out in Table 11.20. Dwellings should also be designed to provide adequate room sizes that create good quality and adaptable living spaces'.*

This will ensure that a balanced approach is taken in order to promote greater choice and a diverse range of tenures within a tenuous housing market.

#### *Apartment standards*

Minimum apartment sizes throughout the country will be determined by the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities*, issued by Department of the Environment, Community and Local Government in December 2015. The Guidelines were issued under Section 28 of the Planning and Development Act 2000 (as amended). All planning authorities (including An Bord Pleanála) are required to have regard to the Guidelines, and to apply any specific planning policy requirements of the Guidelines, in carrying out their functions.

With regard to any variations to minimum apartment sizes Section 2.10 of the Guidelines states:

*It is a specific planning policy requirement of these guidelines that statutory development plans do not set target minimum average floor areas or requirements for additional communal facilities (e.g. common rooms or gyms) or any other aspect of apartment design that do not accord with the requirements set out in these guidelines.*

The proposed variation to increase the minimum standards for apartments by 15 sq.m. per apartment directly conflicts with the mandatory standards contained within the Guidelines and cannot therefore be applied. The inclusion of such a requirement will serve to confuse and reduce the credibility of the County Development Plan. In addition, should the Planning Authority refuse an application for development on the basis that it did not meet the minimum apartments sizes, the Council would be exposed to a claim for compensation.

It is recommended the County Development Plan be made without the increase in Minimum Space Standards for Apartments.

Noting that the Material Alteration as displayed also contains amendments in relation to studio apartments and dual aspect, the Chief Executive recommends a modification to the Material Alteration.

Recommendation It is recommended that County Development Plan be made with the proposed Material Alteration subject to modification as follows:

- Omission of the section of the proposed Material Alteration increasing the Minimum Space Standards for all Houses in Table 11.20
- Omission of the section of the proposed Material Alteration increasing the Minimum Space Standards for One Bedroom, Two Bedroom and Three Bedroom Apartments in Table 11.21.

#### **OTHER – Issue(s) Not Related to Material Alterations**

Issues raised in the submission of the Department of the Environment, Community and Local Government relate to Table 6.6 (Medium to Long Term Road Objectives) of the Draft County Development Plan, which is not subject to any of the proposed Material Alterations or the Environmental Report (Addendum 2).

#### Chief Executive's Response and Recommendation

Submissions in relation to Table 6.6 relate to access to the National Road Network (i.e. N4, N7 and M50). These are not the subject of Material Alteration and cannot be modified at this stage of the process.

Recommendation: It is recommended the submission/s in relation to the above issue cannot be considered at this stage of the plan making process.

#### 0.5.4 Summaries of All Submissions & Observations by Category

Full summaries, responses and recommendations in relation to each of the issues raised under the 96 submissions and observations received during the prescribed public consultation period on the proposed Material Alterations and Environmental Report (Addendum 2) are set out below under the relevant headings in terms of proposed Material Alteration etc.

### CHAPTER 1 - INTRODUCTION & CORE STRATEGY

Material Alteration Ref. Chapter 1 - No.3	
<p>1. The submission of the Department of the Environment, Community and Local Government notes that the Proposed Material Alterations do not include the deletion of the designation of Saggart/Citywest as a 'Moderate Sustainable Growth Town' as advised in their submission on the 24th September 2015. It is advised that Moderate Sustainable Growth Towns within the Metropolitan Areas are typically located within an edge of urban context and are served by heavy rail corridors.</p> <p>Saggart/Citywest is located in close proximity to the Metropolitan Consolidation Towns of Tallaght, Clondalkin and Lucan and its designation as a Moderate Sustainable Growth Town does not align well with the intended role of a Moderate Sustainable Growth Town. This runs the risk of undermining the Metropolitan Consolidation Towns.</p> <p>The designation of Saggart/Citywest is not in compliance with the Settlement Strategy of the Regional Planning Guidelines and should be removed to ensure that the Plan is in accordance with statutory requirements.</p> <p>The Core Strategy could, however, still reflect the role of Saggart/Citywest as an urban area within the Metropolitan Area. (<a href="#">PMADRAFTDEVPLAN0090, Ciara Gilgunn, Department of Environment, Community and Local Government</a>)</p>	<p><b>Chief Executive's Response and Recommendation</b></p> <p>The subject proposed Material Alteration relates to the calculation of residential capacity in the County under table 1.8 of the Draft Plan according to an identified settlement hierarchy.</p> <p>It is accepted that the designation of Saggart-Citywest as a "Moderate Sustainable Growth Town" could be considered to be premature pending the review of the Regional Planning Guidelines for the Greater Dublin Area 2010-2022.</p> <p>Given that 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 and that its population exceeds that of a "Small Town", it is recommended that the proposed Material Alteration be modified with an interim designation for Saggart-Citywest that is akin to a Moderate Sustainable Growth Town. It is considered that this would be consistent with the settlement typologies identified under the Regional Planning Guidelines for the Greater Dublin Area 2010-2022.</p> <p>Such an interim designation would also acknowledge 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</p>



	<p>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 an “Emerging Moderate Sustainable Growth Town” designation would appropriately reflect 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>It is therefore recommended that County Development Plan be made with the proposed Material Alteration subject to modification.</p> <p><b>Recommendation</b> It is recommended that County Development Plan be made with the proposed Material Alteration as displayed subject to the following modification:</p> <p>Modify the “Moderate Sustainable Growth Town” Designation of Saggart – Citywest by removing the Moderate Sustainable Growth Town heading/designation and replacing it with an “<b>Emerging Moderate Sustainable Growth Town</b>” designation in the left hand column of Table 1.8 and in all other Cores Strategy tables, maps and associated text.</p>
<b>Material Alteration Ref. Chapter 1 - No.7</b>	
<p>1. Submission notes support for proposed Material Alteration Ref. Chapter 1-No.7, specifically the amendment to Policy CS1 Objective 3. (<a href="#">PMADRAFTDEVPLAN0013, Richard Butler, Cunnane Stratton Reynolds (on behalf of Edward and Joan Fox)</a>)</p>	<p><b>Chief Executive’s Response and Recommendation</b> The contents of the submission in relation to the proposed Material Alteration to Policy CS1 Objective 3 of the Draft Plan, which relates to the promotion of pre-application consultation for undeveloped lands, are noted.</p> <p><b>Recommendation</b> It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>
<b>Material Alteration Ref. Chapter 1 - No.8</b>	
<p>1. Submission from the EPA notes that the Ballymount and Kingswood (Naas Road) LAPs should be prepared in accordance with the requirements of the SEA, Floods, Water Framework and Habitats Directives, and be consistent with the County Development Plan and Regional Planning Guidelines. (<a href="#">PMADRAFTDEVPLAN0027, David Galvin, Environmental</a>)</p>	<p><b>Chief Executive’s Response and Recommendation</b> The subject proposed Material Alteration relates to (inter alia) the insertion of considerations in relation to the Ballymount LAP and a timeframe for the preparation of an LAP for Kingswood under CS6 SLO1 and CS6 SLO2.</p> <p>The preparation of plans in accordance with EU Directives is a mandatory</p>

<p><a href="#">Protection Agency)</a></p>	<p>requirement and is assessed under the parallel SEA and AA processes. It is not considered necessary to repeat this requirement and add to the volume and complexity of the Introduction and Core Strategy Chapter. It is already stated under Section 1.9.0 of the Draft Plan that LAPs must be consistent with the County Development Plan, which is in itself drawn up to be consistent with the Regional Planning Guidelines and this is stated under Section 1.4.3 (Material Alteration Ref Chapter 1 – No. 2) of the Draft County Development Plan.</p> <p><b>Recommendation</b> It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>
<p><b>Material Alteration Ref. Chapter 1 - No.9</b></p> <p>1. Submission from the EPA notes that the requirements of the SEA, Water Framework and Habitats Directives should be taken into account in the preparation of the revised Clonburris planning scheme. (<a href="#">PMADRAFTDEVPLAN0027, David Galvin, Environmental Protection Agency)</a></p>	<p><b>Chief Executive's Response and Recommendation</b> The subject proposed Material Alteration relates to the establishment of a boundary for the Clonburris SDZ.</p> <p>The preparation of plans including SDZs in accordance with EU Directives is a mandatory requirement and is assessed under the parallel SEA and AA processes. It is not considered necessary to repeat this requirement and add to the volume and complexity of the Introduction and Core Strategy Chapter.</p> <p><b>Recommendation</b> It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>

## Chapter 1 Summary of Recommendations

Material Alteration	Issue	Recommendation
Material Alteration Ref. Chapter 1 - No.3	Designation of Saggart-Citywest	It is recommended that County Development Plan be made with the proposed Material Alteration as displayed subject to the following modification: Modify the “Moderate Sustainable Growth Town” Designation of Saggart – Citywest by removing the associated Moderate Sustainable Growth Town heading/designation and replacing it with an “ <b>Emerging Moderate Sustainable Growth Town</b> ” designation in the left hand column of Table 1.8 and in all other Cores Strategy tables, maps and associated text.
Material Alteration Ref. Chapter 1 - No.7	Promotion of pre-application consultation for undeveloped lands	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 1 - No.8	Ballymount and Kingswood LAPs	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 1 - No.9	Clonburris SDZ	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.

## CHAPTER 2 - HOUSING

<p><b>Material Alteration Ref. Chapter 2 - No.1</b></p> <p>1. Notes the change of social housing requirement lowering from 15% to 10% in line with the Urban Regeneration and Housing Act, 2015 and acknowledges this is beyond the LA's remit but cannot support the material alteration due to the ongoing housing challenges. (<a href="#">PMADRAFTDEVPLAN0056, Jamie Moore, Planning Linkage Group - South Dublin County Public Participation Network</a>)</p>	<p><b>Chief Executive's Response and Recommendation</b></p> <p>The subject proposed Material Alteration to amend Section 2.1.0 text on the Councils' Housing Strategy and reduce the social housing requirement are proposed on foot of changes to Part V (social and affordable housing) of the Planning and Development Act, 2000 under the recent Urban Regeneration and Housing Act, 2015.</p> <p>As noted in the submission, the social housing requirement to be applied to planning permissions for housing on the relevant zoned lands has been amended and it is beyond the scope of the County Development Plan to increase the maximum permissible social housing requirement beyond 10%.</p> <p><b>Recommendation</b></p> <p>It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>
<p><b>Material Alteration Ref. Chapter 2 - No.3</b></p> <p>1. Submission notes support for proposed Material Alteration Ref. Chapter 2-No.3, specifically the amendment to H3 SLO1. (<a href="#">PMADRAFTDEVPLAN0013, Richard Butler, Cunnane Stratton Reynolds (on behalf of Edward and Joan Fox)</a>)</p> <p>2. Submission strongly supports this material alteration - specifically in relation to H3 SLO1. (<a href="#">PMADRAFTDEVPLAN0056, Jamie Moore, Planning Linkage Group - South Dublin County Public Participation Network</a>)</p> <p>3. Submission from land owner requests that the Proposed Amendment to H3 SLO 1 (Edmondstown - former Kilmashogue House) be modified to increase permissible densities to not less than 20 dwellings per hectare. The submission objects to the currently Proposed Amended SLO on the basis of:</p> <ul style="list-style-type: none"> <li>- Lack of potential return to develop the lands;</li> <li>- Discouragement of development by limiting the density required for 'standard' houses;</li> </ul>	<p><b>Chief Executive's Response and Recommendation</b></p> <p>The subject proposed Material Alteration relates to (inter alia) amendments to H3 SLO1 in relation to the prescription of densities for residential development and housing for older people at Edmondstown/former Kilmashogue House with scope to increase densities in accordance with ministerial guidelines where issues of accessibility are resolved.</p> <p><u>Support for Material Alteration</u></p> <p>Submissions that support the proposed amendments to H3 SLO1 are noted.</p> <p><u>Land Owners Requests to Modify Material Alteration</u></p> <p>Further to the submissions of the landowners requesting that the proposed Material Alterations be modified to increase permissible densities or to remove the prescribed maximum net residential densities, it is noted that the lands 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</p>

<ul style="list-style-type: none"> <li>- Placement of the economic viability of developing the lands at risk in an era of acute housing shortage;</li> <li>- The development potential of one of the last areas of land within the M50;</li> <li>- The need to find solutions to potential traffic and accessibility issues rather than present such as an obstacle to development. (<a href="#">PMADRAFTDEVPLAN0039, Martin Cunningham</a>)</li> </ul> <p>4. Submission raises concerns in relation to the proposed amended H3 SLO 1 (Edmondstown - former Kilmashogue House) on the basis of:</p> <ul style="list-style-type: none"> <li>- Failure to provide for the efficient use of available urban land;</li> <li>- Inconsistency with the Guidelines on Sustainable Residential Development in Urban Areas, which seek net densities in the range of 35 to 50 dwellings per hectare on outer suburban/greenfield sites;</li> <li>- The imprecise wording of the amended SLO in relation to resolving accessibility issues ;</li> <li>- Absence of assessment of the capacity of the road network and the absence of road proposals;</li> </ul> <p>It is requested that H3 SLO 1 be amended to remove the prescribed maximum net residential densities and allow for the development of a residential neighbourhood that incorporates housing for older people and provides for the development of the lands in tandem with the completion of required infrastructure including improvements and upgrades to the local road network. (<a href="#">PMADRAFTDEVPLAN0032, Ian McGrandles, IMG Planning Limited</a>)</p> <p>5. Submission from Edmondstown Golf Club relates to H3 SLO 1 (Edmondstown - Former Kilmashogue House) and raises concerns about the impact of the lands on the southern boundary of the Golf Course being developed. It is requested that the SLO be amended to ensure that development has regard to the boundaries of the Golf Course and regard to the protection of its existing amenity and function. It is submitted that such an amendment would be consistent with SLO 91 contained in the 2010 County Development Plan and SLO 113 contained in the 2004 County Development Plan. (<a href="#">PMADRAFTDEVPLAN0078, Edmondstown Golf Club,</a></p>	<p>M50 and Edmondstown Golf Club.</p> <p>In terms of the densities prescribed under the proposed Material Alterations to the SLO (12 DPH - for residential development increased to 20 DPH for housing for older people), 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. Furthermore, 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>The intention of prescribing slightly increased densities for housing for older people is to incentivise and integrate housing for older people within a residential neighbourhood in the Metropolitan Consolidation Area of the County in line with the objectives of the Draft County Development Plan.</p> <p>In recognition of the possible resolution of the issues of accessibility, it is already stated under the proposed Material Alteration that densities may be increased in accordance with the relevant ministerial guidelines where issues of accessibility have been resolved making the proposed modification to the material alterations unnecessary.</p> <p>The resolution of issues of accessibility can be assessed at Development Management stage in line with the assessment of all applications for residential development and it would be inappropriate and beyond the strategic scope of the County Development Plan to attempt to resolve accessibility issues at a level that would prejudice the separate Development Management function.</p> <p><b>Recommendation</b></p> <p>It is therefore recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p> <p><u>Golf Club Request to Modify Material Alteration</u></p> <p>In the context of the location of the lands at Edmondstown within the Metropolitan Consolidation Area of the County, it is considered that HS SLO 1 will not significantly impinge upon the operation or development of the Edmondstown Golf Club.</p>
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<p><a href="#">Edmondstown Golf Club</a>)</p>	<p>Notwithstanding the wording of SLOs under the current and previous County Development Plan, issues on protecting the amenity and function of the Golf Club can be assessed at Development Management stage and it is considered inappropriate and beyond the strategic scope of the County Development Plan to prescribe and pre-empt the assessment of boundary issues at a level that would prejudice the separate Development Management function.</p> <p>It is therefore recommended the County Development Plan be made with the proposed material alteration.</p> <p><b>Recommendation</b> It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>
<p><b>Material Alteration Ref. Chapter 2 - No.4</b></p>	
<ol style="list-style-type: none"> <li>1. Submission notes support for proposed Material Alteration Ref. Chapter 2-No.4, specifically the addition of Policy H8 Objective 7. (<a href="#">PMADRAFTDEVPLAN0013, Richard Butler, Cunnane Stratton Reynolds (on behalf of Edward and Joan Fox)</a>)</li> <li>2. With regard to Policy H8 Objective 6 and Policy H8 SLO3, the EPA acknowledge the screening assessment findings in relation to same, and supports the prioritisation of brownfield land over greenfield sites and the retention of existing densities in residential areas. (<a href="#">PMADRAFTDEVPLAN0027, David Galvin, Environmental Protection Agency</a>)</li> <li>3. Submission objects to H8 SLO 3 (lands between Monastery Road &amp; N7) and the associated proposed mapping amendment MA.C2-04.b by reason of the following: <ul style="list-style-type: none"> <li>- Within the context of shortages of residential accommodation, the brownfield lands are suitable for high residential densities and a compact urban form given their location within a Metropolitan Consolidation Town and their unique position between a high capacity Luas Stop and Town Centre with linkages to the Naas Road QBC;</li> </ul> </li> </ol>	<p><b>Chief Executive's Response and Recommendation</b> The subject proposed Material Alteration relates to (inter alia):</p> <ul style="list-style-type: none"> <li>• The prescription of a residential density of 35-50 dwellings per hectare for greenfield sites outside the M50 that are not subject to an LAP or SDZ under H8 Objective 6;</li> <li>• The facilitation of four and five bedroom houses in areas appropriate to low density residential development under H8 Objective 7;</li> <li>• A reduction of permissible residential densities on lands between Monastery Road and the N7 with focus on family homes under H8 SLO3.</li> </ul> <p><u>H8 Objective 6: Application of 35 – 50 dwellings per Ha. to Greenfield Sites</u> The wording of proposed objective relates to "... green field sites outside the M50". The proposed objective therefore suggests a blanket application of a density range of 35 – 50 dwellings per hectare to all greenfield lands to the west of the M50 that are not subject to an SDZ or LAP. This could include all such greenfield lands not zoned for residential development including lands zoned Objective HA (High Amenity - Dublin Mountains, Dodder Valley and Liffey Valley), RU (rural) and OS (Open Space) and therefore creates conflict with various policies and objectives contained in the Draft County Development Plan, including Zoning Objectives.</p>

<ul style="list-style-type: none"> <li>- The SLO would reduce permissible residential densities on the subject lands to existing low residential densities in the area and would be at variance with the Draft Plan's Core Strategy, the Draft Plan's policies and objectives on residential development, national guidelines on sustainable residential development, the National Spatial Strategy, the Regional Planning Guidelines, other aspects of the Draft County Development Plan 2016 - 2022 and Smarter Travel;</li> <li>- Low density residential development is not practical or viable for the rehabilitation and redevelopment of the subject brownfield lands, which is a disused quarry 5 - 9 metres deep, and the proposed SLO could result in the lands not being developed;</li> <li>- The subject lands have a long established residential zoning and the two previous County Development Plan made provision for their sustainable development;</li> <li>- Significant investment has been made into the proposed planning and development of the subject lands since before the adoption of the 2004 County Development Plan and permitted development on the site could be undermined by the SLO;</li> <li>- The Chief Executives Responses to the February 2016 motion for the proposed SLO, which is quoted in the submission, recommended that the SLO should not be adopted and this position is supported;</li> <li>- The western area of the lands have been developed with 4 and 5 storey office blocks with permission for an additional floor and the most proximate residential development is four storeys in height. (<a href="#">PMADRAFTDEVPLAN0087, Martin Maher, Serdigo (Clondalkin) Ltd.</a>)</li> </ul>	<p>Within this context, it is advised that Section 37(2) of the Planning and Development Act 2000 (as amended) states that where a planning authority has decided to refuse permission on the grounds that a proposed development materially contravenes the development plan, the Board may grant permission on appeal where there are conflicting objectives in the development plan. The proposed objectives could therefore have significant consequences particularly in relation to the protection of the natural amenities and landscapes within the county.</p> <p>It is advised that the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (2009) 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>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). Guidelines that contain specific planning policy requirements must also be applied by planning authorities and the Board in the performance of their functions.</p> <p>In accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (2009), the residential density standard of 35 – 50 dwellings per hectare is not applicable or appropriate to Town Centre and public transport corridors (rail and Luas) located within the County including those located to the west of the M50 and are not subject to an SDZ or LAP, where densities above 50 dwellings per hectare are recommended.</p> <p>Conversely, the proposed objective also suggests a density range that exceeds that permissible for edge of centre sites in Small Towns/villages within the County as prescribed under the Sustainable Residential Development Guidelines and would suggest the overdevelopment of inappropriate sites in locations not subject to an existing Local Area Plan such as Rathcoole.</p> <p>It is recommended that the County Development Plan be made with the proposed Material Alteration subject to a modification that amends the wording of H8 Objective 6 to apply the prescribed density of 35 – 50</p>
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	<p> dwellings per Ha. to open lands that are zoned for residential development or a mix of uses that includes residential development and are located on the periphery of the Metropolitan Consolidation Area or designated Towns within the County whose development will require the provision of new infrastructure and facilities etc.</p> <p><u>H8 Objective 7: Four and Five Bed Homes in Limited Locations</u>  The submission in relation to Policy H8 Objective 7, which seeks to facilitate four and five bedroom detached homes in locations appropriate to low density residential development, is noted.</p> <p><u>H8 SLO 3: Reduction of Density on Lands between Monastery Rd &amp; N7</u>  The area described under the proposed SLO (reduce densities to level in keeping with adjacent residential focusing on family homes) extends well beyond the former quarry site on Monastery Road and includes lands located beyond Knockmeenagh Lane up to and including the N7 and the Red Cow Luas Station. The wording of the proposed SLO is therefore prejudicial to the development of an extensive area of lands within the County and could affect the development potential of multiple sites.</p> <p>It is advised that the site primarily affected by H8 SLO 3 has a long established planning history that is subject to a 10 year planning permission for mixed use development with residential densities that exceed that of the surrounding area. The extant permission does not expire until November 2022 (SD10A/0064 - PL06S.237700) and the proposed SLO adds to uncertainty and could inhibit any proposals to modify the dwelling mix and density of the extant permission.</p> <p>The subject lands are designated within the Metropolitan Consolidation Town of Clondalkin in an area where, according to the Regional Planning Guidelines for the Greater Dublin Area 2010-2022, population and housing growth should be directed particularly in the context of their location close to the Red Cow Luas stop and Clondalkin Town Centre and Village. The subject lands are therefore ideally positioned to help meet the population and housing needs of the County.</p> <p>It is advised that the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (2009) sets out a range of appropriate residential densities for different contexts based on site factors</p>
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	<p>and the level of access to existing and planned infrastructure and services, including public transport, physical and social infrastructure. The Guidelines promote higher residential densities close to public transport corridors and this is supported by policy contained in the Draft Plan.</p> <p>Within this context, Section 34(2) of the Planning and Development Act 2000 (as amended), which relates to the making a decision on a planning application by a planning authority, states that where any requirements of Ministerial Guidelines differ from the provisions of a development plan, then the provisions of the Ministerial Guidelines, to the extent that they so differ, shall apply.</p> <p>The density restriction prescribed under the proposed SLO would represent an inefficient use of zoned lands located close to a high capacity public transport corridor and town centre particularly in the context of their long established planning history.</p> <p>Furthermore, 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 within sustainable communities in accordance with the provisions of the Housing Strategy.</p> <p>The proposed SLO therefore conflicts with the policies and objectives in the Draft Plan, including its Core Strategy, and the Regional Planning Guidelines, 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>It is recommended that the County Development Plan be made with the proposed Material Alteration as displayed subject to a modification that omits H8 SLO 3 (Reduction of Density on Lands between Monastery Rd &amp; N7).</p> <p><b>Recommendation</b></p> <p>It is recommended that County Development Plan be made with the proposed Material Alteration as displayed subject to the following modification:</p>
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	<p>H8 Objective 6: To require that the provisions contained in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (DECLG 2009) relating to Outer Suburban locations <b>(35-50 units per hectare)</b> should apply to <del>green field sites outside the M50</del> <b>open lands that are zoned for residential development or a mix of uses that includes residential development</b>, which are not subject to an LAP or SDZ, <del>therefore requiring residential densities of 35-50 units per hectare.</del> <b>and are located on the periphery of the Metropolitan Consolidation Area or designated Towns within the County whose development will require the provision of new infrastructure, roads, sewers, schools, shops, employment and community facilities.</b></p> <p>H8 Objective 7: To facilitate, in limited locations, four and five bed detached homes on lands that are appropriate to low density residential development.</p> <p>H8 SLO 3: <del>To reduce the permissible residential densities on the land between the Monastery Road and the N7 from the Red Cow Luas Station to St Bridget's Cottages and Round Towers GAA club to a level in keeping with the residential character of the adjacent community along Monastery Road and Woodford Hill, focusing on family homes, appropriate green space &amp; amenity, manageable traffic volumes and safeguarding the village character of the immediate area as the primary gateway into Clondalkin Village.</del></p> <p><b>Recommendation</b> It is also recommended that County Development Plan be made <u>without</u> the associated Map Ref MA.C2-04.b.</p>
<b>Material Alteration Ref. Chapter 2 - No.5</b>	
<p>1. Submission from Building Surveyor and Planner advises that the policies on housing quality should be harmonised between neighbouring counties in accordance with the Planning and Development Legislation. It is also advised that, rather than using descriptive terms like 'passive housing', measurable targets should be set out for air quality, condensation risk and fire safety etc.</p>	<p><b>Chief Executive's Response and Recommendation</b> The subject proposed Material Alteration relates to the prioritisation of passive house construction standards under H11 Objective 2.</p> <p>The Passive House standard (PHS) is a recognised voluntary private sector standard. PHS is different to the Near Zero Energy Buildings (nZEB) which</p>

<p>Adoption of the Irish Green Building Council's Housing Quality Indicator should also be considered. (<a href="#">PMADRAFTDEVPLAN0062, Arthur O'Donnell</a>)</p> <p>2. Supports the amendment which proposes the use of the Passive House standard for new residential development. Strongly suggest that the Council adds the following text to the amendment, however, to ensure that people who plan to build Passive Houses do so using the best available planning and verification tools. Insert "Passive House projects shall be designed and verified using the Passive House Planning Package (or PHPP)". (<a href="#">PMADRAFTDEVPLAN0065, Tomás O'Leary, Passive House Academy</a>)</p> <p>3. Submission welcomes H11 Objective 2 (passive house construction) but proposes that South Dublin County Council should follow the example of DLRCOCO and adopt the wording in their Development Plan, which goes further and sets a mandatory requirement for all new buildings to meet the passive house standards or an equivalent that is supported by robust evidence with regard to efficiency etc. in addition to the requirements of the Building Regulations. Adoption of such policy and wording would avoid confusion in the industry and the setting of different standards in different areas.</p> <p>Legal opinion has highlighted that the energy performance requirements of Part L are in breach of EU law. The passive house standard is recognised by the Intergovernmental Panel on Climate Change as one of the key climate change mitigation options. Evidence has been provided to demonstrate that requiring passive house standard would not increase the cost of building new homes and this includes 'real built examples'. Irish manufacturers stand to benefit from policy on passive housing due to the export potential. Growing concern in relation to ventilation of homes and low energy buildings can be addressed by properly designed, installed and mechanical ventilation systems. Such systems should be mandatory for all new homes.</p> <p>(<a href="#">PMADRAFTDEVPLAN0052, Jeff Colley, Temple Media Ltd (trading as Passive House Plus)</a>)</p>	<p>is the standard which will be required by the Building Regulations in the near future (during the lifetime of the County Development Plan 2016-22), the nZEB will then become the norm across the State. To introduce a mandatory PH requirement in the Development Plan would result in South Dublin County Council operating to a different standard to the rest of the country.</p> <p>To build to PHS requires meeting a number of precise technical criteria (air tightness, U values, thermal bridging, mechanical heat recovery ventilation, cooling demand etc.), and also requires specific on-site care and training. Passive house designers also use the passive housie planning package (PHPP) to ensure that the building design meets PHS. Furthermore, a set of specific on-site tests are required to ensure PH certification. It is likely that, nationally, considerable up-skilling of the design and construction sectors will be required in this regard. It is also considered that to require a mandatory PH requirement for all new build in the South Dublin County could prove ultimately anti-competitive.</p> <p>Applying a more onerous building standard for all new buildings in the County, that would not be in accordance with national State requirements, could significantly diminish and negatively impact the amount of construction activity in South Dublin County, for the coming years or until such time as the nZEB standards are enshrined in the National Building Regulations Standards.</p> <p>The insertion of the phrase "where reasonably practicable" could create ambiguity and would not provide the certainty and clarity that are required from County Development Plan policies and objectives , as it would allow each applicant put forward their own arguments as to why they should, or should not, accord with the PH standard. As such, the implementation and enforcement of planning permissions could not be carried out in a manner as required by the Planning and Development Act 2000 (as amended) and the Planning Regulations. Furthermore, lack of clarity and transparency on the implementation of the PHS, may result in a significant number of appeals to An Bord Pleanála, which could serve to delay the planning application process for a variety of development proposals in South Dublin County.</p> <p>It is considered that the wording of Energy (E) Policy 4 Objective 2 states</p>
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	<p>'To support the passive house standard or equivalent for all new build in the County', is satisfactory and supports the incremental changes to the national building regulations that may occur over the lifetime of the County Development Plan.</p> <p>To proceed with the mandatory requirement for PH standard at this stage would be overly onerous on both the consumer and the construction sector and could delay the delivery of new homes and other proposals being built in the County at a time when Government policy actively promotes the supply of new residential dwellings across the Country – particularly in the Dublin Region.</p> <p><u>Irish Green Building Council's Housing Quality Indicator and other matters</u>  Having regard to Development Plan policies on housing quality, this submission encourages that measurable targets should be set for air quality, condensation risk, fire safety and the use of quality indicators. It is considered that these issues are subject to a different set of legislation, design codes and building regulations and as such are outside the remit of the County Development Plan, in accordance with the Planning and Development Act (2000) as amended.</p> <p>Having regard to the above, it is considered that the energy performance of new buildings is sufficiently addressed in Energy (E) Policy 4 and Chapter 11 Implementation, of the Draft Plan. 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 new buildings in South Dublin County.</p> <p><b>Recommendation</b>  It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>
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## Chapter 2 Summary of Recommendations

Material Alteration	Issue	Recommendation
Material Alteration Ref. Chapter 2 - No.1	Change to social housing requirement	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 2 - No.3	Prescribed densities for residential development and housing for older people at Edmondstown/former Kilmashogue House	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 2 - No.4	<p>Application of 35 – 50 dwellings per Ha. to greenfield sites</p> <p>Four and five bed homes in limited locations</p> <p>Reduction of density on lands between Monastery Rd &amp; N7</p>	<p>It is recommended that County Development Plan be made with the proposed Material Alteration as displayed subject to the following modification:</p> <p><b>H8 Objective 6:</b>  To require that the provisions contained in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (DECLG 2009) relating to Outer Suburban locations <b>(35-50 units per hectare)</b> should apply to <b>green field sites outside the M50 open lands that are zoned for residential development or a mix of uses that includes residential development</b>, which are not subject to an LAP or SDZ, <del>therefore requiring residential densities of 35-50 units per hectare and are located on the periphery of the Metropolitan Consolidation Area or designated Towns within the County whose development will require the provision of new infrastructure, roads, sewers, schools, shops, employment and community facilities.</del></p> <p><b>H8 Objective 7:</b>  To facilitate, in limited locations, four and five bed detached homes on lands that are appropriate to low density residential development.</p> <p><b>H8 SLO 3:</b>  <del>To reduce the permissible residential densities on the land between the Monastery Road and the N7 from the Red Cow Luas Station to St Bridget's Cottages and Round Towers GAA club to a level in keeping with the residential character of the adjacent community along Monastery Road and Woodford Hill, focusing on family homes, appropriate green space &amp; amenity, manageable traffic volumes and safeguarding the village character of the immediate area as the primary gateway into Clondalkin Village.</del></p> <p>It is recommended that County Development Plan be made <u>without</u> the associated Map Ref MA.C2-04.b.</p>

Material Alteration Ref. Chapter 2 - No.5	Prioritisation of passive house construction	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
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## CHAPTER 3 - COMMUNITY INFRASTRUCTURE

<p><b>Material Alteration Ref. Chapter 3 - No.3</b></p> <p>1. Submission notes that the last line of Policy C7 SLO1 should include reference to ensuring that sufficient capacity is built in to provide storage space for special needs and sports equipment from local clubs. (<a href="#">PMADRAFTDEVPLAN0025, nathalie dowing, Lucan Autism Network</a>)</p>	<p><b>Chief Executive's Response and Recommendation</b></p> <p>Policy C7 SLO1 was subject to relocation under Policy C7 to correct a formatting error, namely the erroneous inversion of the wording of C7 Policy 7 and Policy C7 SLO1 (p56 of Draft Plan). No change was proposed to the text of C7 SLO1, which states the following:</p> <p><i>To provide a swimming pool for Lucan on a new sports and leisure centre campus at Griffeen; alternative locations to be sought as part of an extensive public consultation process but with Griffeen identified as the default site. The new sports facility will ensure that sufficient capacity is built in to provide storage space for sports equipment from local clubs'.</i></p> <p>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, in addition to C7 Objective 7 and C7 SLO1 detailed above. The exact specifications or configuration of same is not, however, a matter for the Draft County Development Plan.</p> <p>It is also noted that C7 SLO1 refers specifically to the provision of sufficient capacity for the storage for sports equipment for local clubs. In addition, 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.</p> <p>The wording the existing Policies, Objectives and SLOs of the Draft Plan detailed above are therefore considered adequate and appropriate in this regard.</p> <p><b>Recommendation</b></p> <p>It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>
<p><b>Material Alteration Ref. Chapter 3 - No.4</b></p> <p>1. Submission from the Department of Education and Skills notes that two new post primary schools, one in Lucan to open in 2017 and one in</p>	<p><b>Chief Executive's Response and Recommendation</b></p> <p>The contents of the submission from the Department of Education and</p>

<p>Firhouse to open in 2018 (in addition to 11 other schools due to open nationwide in 2017/2018), were announced by the Minister for Education and Skills in November 2015 following completion of the latest nationwide demographic exercises by the Department regarding additional school accommodation requirements.</p> <p>As such, the Department requests that the last two sentences in the third paragraph under Section 3.11.0 of the Draft Plan be omitted and replaced with reference to two new post primary schools in Lucan and in Firhouse, with Policy C9 Objective 2 amended accordingly.</p> <p>With regard to the fourth paragraph under Section 3.11.0 of the Draft Plan, the Department note that this text may be replaced with text detailing that the Department use GIS (with data from the CSO, OSI and Department of Social Protection in addition to Department of Education and Skills databases) to identify where pressure for additional primary and post-primary school places will arise. Submission notes that demographic changes in South Dublin will continue to be monitored on an ongoing basis and is it possible that further educational requirements may arise over the lifetime of the Development Plan. Submission also noted new programme of capital investment in schools, which lists school projects planned to go to construction in the 2016-2022 period, which was published in November 2015.</p> <p>Submission includes information used to calculate educational infrastructural requirements (Appendix 1), Site Suitability specifications (Appendix 2), and Department's 2016-2021 construction programme projects.</p> <p><a href="#">(PMADRAFTDEVPLAN0089, Anne Flynn, Department of Education &amp; Skills)</a></p>	<p>Skills in relation to the proposed Material Alteration of Section 3.11.0 of the Draft Plan 2016-2022, specifically regarding additional text added to Section 3.11.0 of the Draft Plan regarding Educational Facilities on the basis of a previous request from the Department, is noted. The submission from the Department regarding Material Alteration Ref. Chapter 3 – No.4 relates to further amendments to the narrative text of Section 3.11.0, predominantly comprising newly available details on school provision and identification of school needs.</p> <p>Having regard to the submission from the Department, it is considered that Paragraph 3 of Section 3.11.0 should be amended to include reference to the two new post primary schools in Lucan and in Firhouse, due for delivery in 2017 and 2018 respectively, as detailed in the Department's submission.</p> <p>With regard to the associated request to amend Policy C9 Objective 2, which currently states:</p> <p>‘To support and facilitate the provision of additional post primary schools in Kingswood (Tallaght); Lucan; Saggart/Citywest; Newcastle/Rathcoole; and Ballycullen/Firhouse/Knocklyon areas’.</p> <p>it is considered that wording of the existing policy addresses the intention of the submission with regard to the forthcoming schools in Lucan and Firhouse noted above, and is adequate and appropriate in this regard.</p> <p>Furthermore, having regard to the contents of the submission from the Department and in the interest of clarity, it is considered that Paragraph 4 of Section 3.11.0 should be amended to include the method by which the Department identify future school needs, and that the demographic changes in South Dublin will be monitored on an ongoing basis to meet future school needs.</p> <p><b>Recommendation</b></p> <p>It is recommended that County Development Plan be made with the proposed Material Alteration subject to modification as follows:</p> <p>3.11.0 Educational Facilities</p> <p>Educational facilities have an important role to play in developing sustainable and balanced communities in the County. The Department</p>
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	<p>of Education and Skills is responsible for the delivery of educational facilities and services.</p> <p>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 support the Department's Schools Building Programme. <b>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.</b></p> <p>The Department of Education and Skills will commence a new phase of school building during the period 2016-2022. The Department has identified a need for additional post primary schools in South Dublin County up to 2026. Schools in Lucan (Kishoge Community College), Tallaght (Kingswood) and Rathcoole (Holy Family Community School) are under construction or at design stage. <del>Demand for further provision is also identified in the Lucan; Saggart/Citywest; Newcastle/Rathcoole; Knocklyon/Firhouse/Ballycullen areas.</del> <b>The Department identifies a possible requirement for further provision in the Lucan and Dublin 24 areas particularly, although other areas may also require some level of additional provision. Two new post primary schools, one in Lucan to open in 2017 and one in Firhouse to open in 2018 (in addition to 11 other schools due to open nationwide in 2017/2018), were announced by the Minister for Education and Skills in November 2015 following completion of the latest nationwide demographic exercises by the Department regarding additional school accommodation requirements.</b></p> <p>With regard to primary school requirements, the Department of Education and Skills <b>uses a Geographical Information System (with data from the CSO, OSI and Department of Social Protection in addition to Department of Education and Skills own databases) to identify where pressure for additional primary and post-primary school places will arise</b> <del>reviews demographic data on an ongoing basis, with any requirements for additional accommodation at primary level up to 2026 in the Development Plan area, and cater for same</del> either via new schools or expansion of existing schools, <del>identified</del></p>
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	<p>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. <b>Demographic changes in South Dublin will continue to be monitored by the Department of Education and Skills on an ongoing basis and it is possible that further educational requirements may arise over the lifetime of this Plan.</b></p> <p>The Provision of Schools and the Planning System, a Code of Practice for Planning Authorities, published jointly by the Department of Education and Skills and the Department of Environment Heritage and Local Government, sets out the best practice approach to facilitate the timely and cost effective roll out of school facilities.</p> <p>South Dublin County Council will continue to support and facilitate the provision of primary and post primary school facilities to serve all cultural and religious needs of the County, and support the colocation of schools or 'stand alone' institutions where appropriate.</p>
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## Chapter 3 Summary of Recommendations

Material Alteration	Issue	Recommendation
Material Alteration Ref. Chapter 3 - No.3	Policy C7 SLO1	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 3 - No.4	Additional text to narrative of Section 3.11.0 comprising newly available details on school provision and identification of school needs.	<p>It is recommended that County Development Plan be made with the proposed Material Alteration subject to the following modification:</p> <p><b>3.11.0 Educational Facilities</b></p> <p>Educational facilities have an important role to play in developing sustainable and balanced communities in the County. The Department of Education and Skills is responsible for the delivery of educational facilities and services.</p> <p>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 support the Department's Schools Building Programme. <i>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.</i></p> <p>The Department of Education and Skills will commence a new phase of school building during the period 2016-2022. The Department has identified a need for additional post primary schools in South Dublin County up to 2026. Schools in Lucan (Kishoge Community College), Tallaght (Kingswood) and Rathcoole (Holy Family Community School) are under construction or at design stage. <del>Demand for further provision is also identified in the Lucan; Saggart/Citywest; Newcastle/Rathcoole; Knocklyon/Firhouse/Ballycullen areas. The Department identifies a possible requirement for further provision in the Lucan and Dublin 24 areas particularly, although other areas may also require some level of additional provision.</del> <i>Two new post primary schools, one in Lucan to open in 2017 and one in Firhouse to open in 2018 (in addition to 11 other schools due to open nationwide in 2017/2018), were announced by the Minister for Education and Skills in November 2015 following completion of the latest nationwide demographic exercises by the Department regarding additional school accommodation requirements.</i></p> <p><del>With regard to primary school requirements, the Department of Education and Skills uses a Geographical Information System (with data from the CSO, OSI and Department of Social Protection in addition to Department of Education and Skills own databases) to identify where pressure for additional primary and post-primary school places will arise reviews demographic data on an ongoing basis, with any requirements for</del></p>

		<p><del>additional accommodation at primary level up to 2026 in the Development Plan area, and cater for same</del> either via new schools or expansion of existing schools, 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. <b>Demographic changes in South Dublin will continue to be monitored by the Department of Education and Skills on an ongoing basis and is it possible that further educational requirements may arise over the lifetime of this Plan.</b></p> <p>The Provision of Schools and the Planning System, a Code of Practice for Planning Authorities, published jointly by the Department of Education and Skills and the Department of Environment Heritage and Local Government, sets out the best practice approach to facilitate the timely and cost effective roll out of school facilities.</p> <p>South Dublin County Council will continue to support and facilitate the provision of primary and post primary school facilities to serve all cultural and religious needs of the County, and support the colocation of schools or 'stand alone' institutions where appropriate.</p>
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## CHAPTER 4 - ECONOMIC DEVELOPMENT & TOURISM

Material Alteration Ref. Chapter 4 - No.3	
<p>1. With regard to ET3 SLO1, the EPA note the assessment findings that '...the development type in the business park is not compatible with town centres or brownfield sites, due to the demand for land...' and in particular, note the issues relating to poor public transport provision and the potential for significant negative effects on biodiversity features such as treelines, hedgerows, ecological corridors and landscape character. In preparing a long-term plan for the expansion of the Grange Castle Economic and Enterprise Zone, the requirements of the SEA, Habitats, Floods and Water Framework Directives should be integrated, as appropriate. The Plan should provide for the protection and incorporation of existing green infrastructure in seeking to further develop this area. (<a href="#">PMADRAFTDEVPLAN0027, David Galvin, Environmental Protection Agency</a>)</p> <p>2. Submission notes that ET3 SLO 1 is welcomed in principle but requests that the scope of the SLO should be extended to include part of the Peamount lands, i.e. those lands to the south of the R120, which can form an extension of the existing employment and enterprise zoned lands to the east. The proposed inclusion of this land as part of the ET3 SLO1 is considered to be in accordance with the proper planning and sustainable development of the area. The submission sets out a justification for this under the following headings: 1. Vision for Peamount, 2. Policy context, 3. Strategic Location of Peamount Lands and 4. Proposed Specific Local Objective (ET3 SLO 1). (<a href="#">PMADRAFTDEVPLAN0060, Robert Keran, John Spain Associates</a> <a href="#">PMADRAFTDEVPLAN0072, John Spain &amp; Associates, John Spain &amp; Associates, Peamount Healthcare</a>)</p> <p>3. The submission of the Department of Arts, Heritage and the Gaeltacht welcomes the inclusion of ET3 SLO 1 (review of lands south of Grand Canal), which includes for a natural heritage area at Gollierstown. (<a href="#">PMADRAFTDEVPLAN0082, Michael Murphy, Dev. Applications Unit</a>)</p>	<p><b>Chief Executive's Response and Recommendation</b> A number of submissions were received with regard to proposed ET3 SLO1 which states: 'To conduct a review of the zoning of lands south of the Grand Canal and west and north of the R120, including lands adjoining Peamount Healthcare, with a view to preparing a long-term plan for the expansion of the Grange Castle Economic and Enterprise Zone to this area, to accommodate strategic investment in the future, while also seeking to provide public open space along the Canal, including a natural heritage area in the vicinity of the historic canal quarries at Gollierstown'.</p> <p>These are addressed under the following headings for clarity:</p> <ul style="list-style-type: none"> <li>▪ EPA submission</li> <li>▪ Extension of SLO to include further lands at Peamount</li> <li>▪ Department of Arts, Heritage and the Gaeltacht submission</li> </ul> <p><u>EPA submission</u> With regard to the EPA's submission, it is noted that the review and any long-term plan regarding the lands subject to the SLO will take account of and integrate the requirements of the SEA, Habitats, Floods and Water Framework Directives, as appropriate, with this plan subject to Appropriate Assessment. In addition, it is noted that any such long-term plan would provide for the protection and incorporation of existing green infrastructure in any further development of this area, in compliance with the provisions of the Draft Plan and forthcoming Green Infrastructure Strategy for the County, provided for under Green Infrastructure G Policy 1 of the Plan.</p> <p><u>Extension of SLO to include further lands at Peamount</u> With regard to the area of lands encompassed by ET3 SLO1, it is considered that the SLO as detailed above is consistent with the Economic Strategy for South Dublin County and Section 1.12.0 of the Draft Plan regarding Employment Lands. In the absence of a review of the zoning of the lands, as provided for under ET3 SLO1, and resultant evidence based requirement, it is not considered appropriate to extend</p>

	<p>the extent of lands subject to the SLO at Peamount at this time.</p> <p><u>Department of Arts, Heritage and the Gaeltacht submission</u> The contents of the submission from the Department of Arts, Heritage and the Gaeltacht, welcoming the inclusion of ET3 SLO1, is noted.</p> <p><b>Recommendation</b> It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>
<b>Material Alteration Ref. Chapter 4 - No.4</b>	
<p>1. Submission objects to proposed ET3 SLO2 regarding the Former Interbloem Premises, Corkagh (subject to proposed Material Alteration Ref. Chapter 4-No.4 and proposed mapping amendment Ref.MA.C4-04) on the basis of the availability of enterprise and employment lands in the vicinity of the site, current operations on site, planning and enforcement history of the subject premises, and detrimental impact on the local heritage and wildlife of Corkagh Park. (<a href="#">PMADRAFTDEVPLAN0017, Sean Boylan</a>)</p> <p>2. Inclusion of ET3 SLO 2 (Former Interbloem Premises) as a Proposed Material Alteration is noted. It is advised that any development proposed at this location should ensure that the operating capacity and safety of the national road network is maintained in accordance with national guidelines. (<a href="#">PMADRAFTDEVPLAN0030, Tara Spain, Transport Infrastructure Ireland</a> <a href="#">PMADRAFTDEVPLAN0085, Transport Infrastructure Irl</a>)</p> <p>3. Submission welcomes the Proposed Material Alteration in relation to ET3 SLO2 and Material Alteration Map Ref MA.C4-04, which seeks to facilitate warehousing and ancillary auction uses at the Former Interbloem Premises. It is submitted that the proposed Material Alterations will assist the operation of the business at this location. It is therefore requested that the South Dublin County Council Development Plan 2016 - 2022 be made with the Material Alteration. (<a href="#">PMADRAFTDEVPLAN0076, BMA Planning, BMA Planning, Wilson</a>)</p>	<p><b>Chief Executive's Response and Recommendation</b> A number of submissions were received with regard to proposed ET3 SLO2 which states: 'To facilitate warehousing and ancillary auction uses at the Former Interbloem Premises, Corkagh off the Green Isle Road subject to proper planning and sustainable development including protection of the operating capacity and safety of the N7 and its interchange with the Green Isle Road and Grange Castle Road, safeguarding the setting of Corkagh Park and its protected structures, and consideration of any potential impacts on the operation and safety of Casement Aerodrome'.</p> <p>These are addressed under the following headings for clarity:</p> <ul style="list-style-type: none"> <li>▪ Principle of the SLO</li> <li>▪ Operations on site of SLO</li> </ul> <p><u>Principle of the SLO</u> The contents of the submission objecting to the inclusion of ET3 SLO2 is noted. In this regard it is noted that the wording of the SLO as detailed above provides for the facilitation of warehousing and ancillary auction uses at the subject site, subject to planning and sustainable development including safeguarding the setting of Corkagh Park and its protected structures. Having regard to the established use and context of the subject site, ET3 SLO2 is considered appropriate in this instance.</p> <p>The contents of the submission from BMA Planning welcoming the inclusion of ET3 SLO2, is noted.</p>

<p><a href="#">Auctioneers</a>)</p>	<p><b>Operations on site of SLO</b> The contents of the submissions which references the operations on the subject site, including current operations on site and the impact of any development on site on the operating capacity and safety of the national road network, are noted.</p> <p>It is noted that the wording of the SLO as detailed above provides for the facilitation of warehousing and ancillary auction uses at the subject site, subject to proper planning and sustainable development including protection of the operating capacity and safety of the N7 and its interchange with the Green Isle Road and Grange Castle Road. The exact specification of any existing or proposed operations at the subject site is not, however, a matter for the County Development Plan and would be addressed at Development Management/planning application stage.</p> <p>It is also noted that any issues of planning enforcement is not a matter for the County Development Plan which is a strategic land use document, and may be addressed under the Planning Enforcement process.</p> <p><b>Recommendation</b> It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>
<p><b>Material Alteration Ref. Chapter 4 - No.5</b></p>	
<p>1. Submission supports this material alteration. (<a href="#">PMADRAFTDEVPLAN0056, Jamie Moore, Planning Linkage Group - South Dublin County Public Participation Network</a> )</p>	<p><b>Chief Executive's Response and Recommendation</b> The contents of the submission in relation to the proposed Material Alteration of ET Policy 6 regarding Greenways, Trails &amp; Loops, specifically the inclusion of cross reference with Chapter 9 in ET Policy 6, reference to blueways/water trails in ET6 Objective 1, and inclusion of the National Transport Authority in the list of funding agencies in the Action under ET Policy 6, are noted.</p> <p><b>Recommendation</b> It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>

<p><b>Material Alteration Ref. Chapter 4 - No.6</b></p> <ol style="list-style-type: none"> <li>1. Submission supports this material alteration. (<a href="#">PMADRAFTDEVPLAN0056, Jamie Moore, Planning Linkage Group - South Dublin County Public Participation Network</a> )</li> <li>2. Submission supports proposed material alterations to ET7 Objective 3 (canoeing/kayaking infrastructure). (<a href="#">PMADRAFTDEVPLAN0088, Roger Garland, Keep Ireland Open</a>)</li> </ol>	<p><b>Chief Executive's Response and Recommendation</b> The contents of the submission in relation to the proposed Material Alteration of ET Policy 7 regarding Leisure Activities, specifically the inclusion of reference to canoeing/kayaking infrastructure in ET7 Objective 3, are noted.</p> <p><b>Recommendation</b> It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>
<p><b>Material Alteration Ref. Chapter 4 - No.7</b></p> <ol style="list-style-type: none"> <li>1. Submission supports proposed material alterations to ET8 Objective 2 (geological heritage) and its associated Action. (<a href="#">PMADRAFTDEVPLAN0088, Roger Garland, Keep Ireland Open</a>)</li> </ol>	<p><b>Chief Executive's Response and Recommendation</b> The contents of the submission in relation to the proposed Material Alteration of ET Policy 8 regarding Heritage, Culture &amp; Events Tourism, specifically the inclusion of reference to the County's geological heritage in ET Policy 8 and inclusion of the Geological Survey of Ireland the list of key stakeholders in the Action under ET Policy 8, are noted.</p> <p><b>Recommendation</b> It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>
<p><b>Material Alteration Ref. Chapter 4 - No.9</b></p> <ol style="list-style-type: none"> <li>1. Submission supports proposed material alterations to ET10 Objectives 2 &amp; 3 (mineral extraction). (<a href="#">PMADRAFTDEVPLAN0088, Roger Garland, Keep Ireland Open</a>)</li> </ol>	<p><b>Chief Executive's Response and Recommendation</b> The contents of the submission in relation to the proposed Material Alteration of ET Policy 10 regarding Mineral Extraction, specifically the inclusion of reference to significant adverse effects in high amenity areas in ET10 Objective 2 and reference to reinstatement and/or reuse of quarries and extraction facilities in ET Objective 3, are noted.</p> <p><b>Recommendation</b> It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>



## Chapter 4 Summary of Recommendations

Material Alteration	Issue	Recommendation
Material Alteration Ref. Chapter 4 - No.3	ET3 SLO1 EPA submission & Extension of SLO to include further lands at Peamount & Department of Arts, Heritage and the Gaeltacht submission	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 4 - No.4	ET3 SLO2 Principle of the SLO & Operations on site of SLO	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 4 - No.5	ET Policy 6	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 4 - No.6	ET Policy 7 & ET7 Objective 3	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 4 - No.7	ET Policy 8	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.

Material Alteration Ref. Chapter 4 - No.9	ET Policy 10	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
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## CHAPTER 5 - URBAN CENTRES & RETAILING

<b>Material Alteration Ref. Chapter 5 - No.1</b>	
<p>1. Submission supports this material alteration - as long as it does not affect the community facility development of the region in which the centres noted are based. (<a href="#">PMADRAFTDEVPLAN0056, Jamie Moore, Planning Linkage Group - South Dublin County Public Participation Network</a>)</p>	<p><b>Chief Executive's Response and Recommendation</b> The relevant section of the proposed Material Alteration is the proposal to move Knocklyon Shopping Centre, Firhouse Shopping Centre and Palmerstown Shopping Centre from Level 3 to Level 4 in Table 5.1 of the Draft Plan. Table 5.1 is titled South Dublin County Retail Hierarchy.</p> <p>Submission supporting the proposed Material Alteration is noted by the Chief Executive. The centres remain zoned as District Centres (DC) and community development in DC zoning is encouraged under a range of policies and objectives in Chapter 5, in particular Section 5.1.3 District Centres.</p> <p><b>Recommendation</b> It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>
<b>Material Alteration Ref. Chapter 5 - No.3</b>	
<p>1. It is considered that the amended text aligns more closely with the overarching retail policies and objectives contained in the Draft Plan and provides a greater degree of clarity for Liffey Valley and its role and potential to develop as a Major Retail Centre and compete with other Level 2 centres within the Greater Dublin Area. (<a href="#">PMADRAFTDEVPLAN0055, Robert McLoughlin, Bilfinger GVA</a>)</p>	<p><b>Chief Executive's Response and Recommendation</b> Proposed Material Alteration Ref Chapter 5 – No.3 provides for minor changes to text in Section 5.3 Additional Retail Floorspace.</p> <p>Submission supporting the proposed Material Alteration is noted by the Chief Executive.</p> <p><b>Recommendation</b> It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>
<b>Material Alteration Ref. Chapter 5 - No.8</b>	
<p>1. Submission objects to the removal of the words 'high density' from R6 Objective 3 on the basis that the removal of these words goes against all that was planned and agreed in the SDZ development plan for Adamstown. Submission notes that the omission would be detrimental not only for Adamstown but for the whole country. (<a href="#">PMADRAFTDEVPLAN0008, Michele Uí Bhuachalla</a>)</p>	<p>Submission raises issues in relation to the proposed Material Alteration Ref Chapter 5- No.8.</p> <p>This Material Alteration relates to changes to Objective 6 in the Retail (R) Policy 6 District Centres. The proposed Material Alteration is as follows: (red text indicates proposed deletion from Draft Plan)</p>

2. Submission requests the addition of the word 'cycling' in R6 Objective 3 as follows: "To support and facilitate the development of new District Centres of an appropriate high density urban scale at Adamstown.....facilitates walking, ["cycling"] and use of public transport....  
([PMADRAFTDEVPLAN0008, Michele Uí Bhuachalla](#))

**R6 Objective 3:**

To support and facilitate the development of new District Centres of an appropriate ~~high density~~ urban scale at Adamstown and Clonburris in accordance with approved Planning Schemes which should provide a sustainable retail mix ~~including department stores and shopping centres~~ that facilitates walking and use of public transport and reduces car journeys outside the SDZ for many retail needs.

The development of Adamstown and Clonburris will be guided by detailed SDZ Planning Schemes approved by An Bord Pleanála. The SDZ process and Planning Scheme stand-alone from the County Development Plan process. As such, 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. In this context, the proposed material alteration is recommended.

The Chief Executive notes the proposal to include 'cycling' in the wording of the objective and agrees with same.

**Recommendation**

It is recommended that County Development Plan be made with the proposed Material Alteration subject to modification:

To support and facilitate the development of new District Centres of an appropriate ~~high density~~ urban scale at Adamstown and Clonburris in accordance with approved Planning Schemes which should provide a sustainable retail mix ~~including department stores and shopping centres~~ that facilitates walking, **cycling** and use of public transport and reduces car journeys outside the SDZ for many retail needs.

## Chapter 5 Summary of Recommendations

Material Alteration	Issue	Recommendation
Material Alteration Ref. Chapter 5 - No.1	Retail Hierarchy	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 5 - No.3	Minor Wording in Additional Retail Floorspace (Section 5.3.0)	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 4 - No.8	Retail Policy 6 District Centres – Objective 3	It is recommended that County Development Plan be made with the proposed Material Alteration subject to modification: To support and facilitate the development of new District Centres of an appropriate <del>high density</del> urban scale at Adamstown and Clonburris in accordance with approved Planning Schemes which should provide a sustainable retail mix <del>including department stores and shopping centres</del> that facilitates walking, <b>cycling</b> and use of public transport and reduces car journeys outside the SDZ for many retail needs.

## CHAPTER 6 - TRANSPORT AND MOBILITY

<p><b>Material Alteration Ref. Chapter 6 - No.1</b></p> <p>1. Submission notes approval of inclusion of walking and cycling in the overarching objectives in Section 6.1.0. (<a href="#">PMADRAFTDEVPLAN0054, Mairead Forsythe, Dublin Cycling Campaign</a>)</p>	<p><b>Chief Executive's Response and Recommendation</b> Section 6.1.0 contains the overarching Policies and Objectives of the Draft Plan in relation to transport and mobility. Details of the submissions are acknowledged.</p> <p><b>Recommendation</b> It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>
<p><b>Material Alteration Ref. Chapter 6 - No.2</b></p> <p>1. Submission positively notes that 'Improved facilities for pedestrians and cyclists, such as increased footpath/cyclepath widths and safer crossings;' has been added to 6.1.2 . (<a href="#">PMADRAFTDEVPLAN0054, Mairead Forsythe, Dublin Cycling Campaign</a>)</p> <p>2. Submission notes that there is still no mention of the provision of secure bicycle parking at transport hubs in 6.1.2, in 6.2.1, or in the schedule of Park and Ride Facilities in Table 6.3, nor are there any proposals for measures to encourage intermodal transport in 6.2. Submission notes that these measures would encourage greater use of public transport. (<a href="#">PMADRAFTDEVPLAN0054, Mairead Forsythe, Dublin Cycling Campaign</a>)</p>	<p><b>Chief Executive's Response and Recommendation</b> Section 6.1.2 of the Draft Plan refers to Integrated Transport Studies. Section 6.2.1 of the Draft Plan refers to Parks and Ride Facilities. Requirements for bicycle parking are contained within Section 11.4.1 - Bicycle Parking Standards of the Draft Plan and state that in addition to the standard bicycle parking requirements contained within Table 11.22 the Council will seek to: <i>'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'.</i></p> <p><b>Recommendation</b> It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>
<p><b>Material Alteration Ref. Chapter 6 - No.3</b></p> <p>1. Submission supports the addition of additional text under Policy TM2 Actions relating to investigate plans for the development of future public transport links between Hazelhatch and Saggart, and Newcastle and Rathcoole, noting that with increased population in the area and the growth of industrial estates and campuses, there is a need for greater public transport links between these villages. (<a href="#">PMADRAFTDEVPLAN0029, Frances Fitzgerald TD, Minister, Minister Frances Fitzgerald TD</a>)</p>	<p><b>Chief Executive's Response and Recommendation</b> Submissions relate to Section 6.2.0 of the Draft Plan which contains Policies and Objectives in relation to public transport. Details of the submissions are acknowledged.</p> <p><b>Recommendation</b> It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>

<ol style="list-style-type: none"> <li>2. Supports the enhancement of transport infrastructure in the County including the Lucan Luas line and the Core Orbital Bus Network. (<a href="#">PMADRAFTDEVPLAN0055, Robert McLoughlin, Bilfinger GVA</a>)</li> <li>3. Submission supports this material alteration (<a href="#">PMADRAFTDEVPLAN0056, Jamie Moore, Planning Linkage Group - South Dublin County Public Participation Network</a> )</li> </ol>	
<b>Material Alteration Ref. Chapter 6 - No.4</b>	
<ol style="list-style-type: none"> <li>1. Submission supports the addition of TM3 Objective 5 in the Draft Plan. (<a href="#">PMADRAFTDEVPLAN0029, Frances Fitzgerald TD, Minister, Minister Frances Fitzgerald TD</a>)</li> <li>2. Submission welcomes addition of Objective 5 under Policy TM3. (<a href="#">PMADRAFTDEVPLAN0054, Mairead Forsythe, Dublin Cycling Campaign</a>)</li> <li>3. Submission welcomes addition of new action under Policy TM3. (<a href="#">PMADRAFTDEVPLAN0054, Mairead Forsythe, Dublin Cycling Campaign</a>)</li> <li>4. Submission supports this material alteration - in particular TM3 Objective 5. (<a href="#">PMADRAFTDEVPLAN0056, Jamie Moore, Planning Linkage Group - South Dublin County Public Participation Network</a> )</li> <li>5. The Department of Arts, Heritage and the Gaeltacht welcomes the inclusion of TM3 Objective 6, which seeks to ensure that walking and cycling routes have regard to environmental conditions and sensitivities and incorporate appropriate avoidance and mitigation measures. (<a href="#">PMADRAFTDEVPLAN0082, Michael Murphy, Dev. Applications Unit</a>)</li> <li>6. Submission supports proposed material alterations to Section 6.3.0 (walking and cycling). (<a href="#">PMADRAFTDEVPLAN0088, Roger Garland,</a></li> </ol>	<p><b>Chief Executive's Response and Recommendation</b>  Submissions relate to Section 6.3.0 of the Draft Plan which contains Policies and Objectives in relation to walking and cycling. Details of the submissions are acknowledged.</p> <p><b>Recommendation</b>  It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>

<a href="#">Keep Ireland Open</a>	
<b>Material Alteration Ref. Chapter 6 - No.5</b>	
<ol style="list-style-type: none"> <li>1. Submission supports this material alteration. (<a href="#">PMADRAFTDEVPLAN0056, Jamie Moore, Planning Linkage Group - South Dublin County Public Participation Network</a> )</li> <li>2. Submission supports proposed material alterations to Table 6.4 (Six Year Cycle Network Programme). (<a href="#">PMADRAFTDEVPLAN0088, Roger Garland, Keep Ireland Open</a>)</li> </ol>	<p><b>Chief Executive's Response and Recommendation</b>  Submissions relate to Section 6.3.1 of the Draft Plan which contains Policies and Objectives in relation to the strategic cycle network. Details of the submissions are acknowledged.</p> <p><b>Recommendation</b>  It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>
<b>Material Alteration Ref. Chapter 6 - No.6</b>	
<ol style="list-style-type: none"> <li>1. Submission notes with regard to Section 6.4 that apart from proposed new developments, attention should be given to existing traffic, particularly the road that bisects Palmerstown. (<a href="#">PMADRAFTDEVPLAN0019, Sean Treanor</a>)</li> </ol>	<p><b>Chief Executive's Response and Recommendation</b>  Section 6.4 of the Draft Plan contains Policies and Objectives in relation to the County road and street network. TM Policy 5 Traffic and Transport states:  <i>'It is the policy of Council to effectively manage and minimise the impacts of traffic within the County'.</i></p> <p>TM5 Objective 1 also states:  <i>'To effectively manage the flow of through traffic along the strategic road network and maximise the efficient use of existing road resources'.</i></p> <p>The implementation of this Policy and Policy Objective is further detailed in the Actions contained thereunder.</p> <p>It should also be noted that Table 6.6 Medium to Long Term Road Objectives includes a proposal to upgrade of the existing junction between Kennelsfort Road and the R148 (former N4) with a grade separated junction to enhance the efficiency of the junction.</p> <p><b>Recommendation</b>  It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>



Material Alteration Ref. Chapter 6 - No.7	
<ol style="list-style-type: none"> <li>1. Agree with the CEO's original report NOT to remove the Firhouse - N81 and Oldcourt - Oldbawn bridges. It would be non-sensical for these bridges to be removed and would result in future under-development of public transport initiatives. (<a href="#">PMADRAFTDEVPLAN0056, Jamie Moore, Planning Linkage Group - South Dublin County Public Participation Network</a>)</li> <li>2. Concerns raised by Thomas Davis GAA Club regarding the uncertainty over the policy context of the Bohernabreena to Kiltipper medium to long term bridge. Club are concerned that despite the removal of the bridge by SDCC, the inclusion of the bridge by the National Transport Authority as a priority may constrain the future development of their lands or bisect, in the future, any new playing pitches provided. (<a href="#">PMADRAFTDEVPLAN0071, Eoin O'Cofaigh, McHugh O'Cofaigh, Thomas Davis GAA Club</a> <a href="#">PMADRAFTDEVPLAN0097, Eoin Dunphy, McHugh O'Cofaigh, Thomas Davis GAA Club</a>)</li> <li>3. Submission from the Thomas Davis GAA Club requesting an SLO on their lands in the final Plan to address the uncertainty over the proposed link bridge from Kiltipper to Bohernabreena and its possible impact on their development plans. The SLO proposed is intended to enable redevelopment of the GAA owned lands adjacent to the Dodder to allow for 2no. GAA pitches, ancillary recreational facilities, accommodate the Dodder Linear park &amp; the NTA cycle network and to enable residential development to the same standard and density as Ellensborough. (<a href="#">PMADRAFTDEVPLAN0071, Eoin O'Cofaigh, McHugh O'Cofaigh, Thomas Davis GAA Club</a> <a href="#">PMADRAFTDEVPLAN0097, Eoin Dunphy, McHugh O'Cofaigh, Thomas Davis GAA Club</a>)</li> <li>4. The Department of Arts, Heritage and the Gaeltacht welcomes the removal of two new bridges across the River Dodder. (<a href="#">PMADRAFTDEVPLAN0082, Michael Murphy, Dev. Applications Unit</a>)</li> <li>5. Submission agrees with the CEO's original report not to remove the</li> </ol>	<p><b>Chief Executive's Response and Recommendation</b></p> <p>The position of the Executive in relation to the proposed Firhouse - N81 and Oldcourt - Oldbawn bridges has been outlined previous reports to Council. In summary these bridges were sought to:</p> <ul style="list-style-type: none"> <li>• Relieve local traffic congestion in order to enhance public transport services throughout areas to the south of Tallaght.</li> <li>• Relieve the additional pressures that will be placed on the local road network through the development of lands within the Ballycullen-Oldcourt Local Area Plan.</li> </ul> <p>The removal of these bridges from the Plan will inhibit the ability of Council and other service providers (such as the National Transport Authority, whom have included both bridges within the Draft Transport Strategy for the Greater Dublin Area 2016-2035) to manage traffic congestion in the area and provide viable alternatives to private vehicle usage.</p> <p>The request for an SLO to facilitate the redevelopment of the Thomas Davis GAA Club does not relate directly to the proposed Material Alteration to remove the bridges from the Plan and cannot be considered at this stage of the process.</p> <p>It should be noted that the public transports route shown within the Draft Transport Strategy for the Greater Dublin 2016-2035 are indicative only. Any final proposals would be subject to a detailed route section and public consultation process.</p> <p><b>Recommendation</b></p> <p>It is recommended the County Development Plan be made with the proposed Material Alteration as displayed subject to modification to reinsert details of the Firhouse-N81 Bridge and the Oldcourt-Oldbawn Bridge (including proposal, description and route) into Table 6.6 Medium to Long Term Road Objectives.</p> <p><b>Recommendation</b></p> <p>It is recommended that the County Development Plan be made <u>without</u> the associated development plan mapping proposed Material Alteration MA.C6-07.a and MA.C6-07.b.</p>

<p>Firhouse-N81 and Oldcourt-Oldbawn bridges and expresses deep concerns regarding same on the basis that the omission of these bridges would have the following local and regional effects:</p> <ul style="list-style-type: none"> <li>- downgrading of public transport priorities stated in the Draft Plan,</li> <li>- isolation of areas south of the River Dodder from facilities in Tallaght,</li> <li>- increased traffic volumes, traffic congestion and pollution,</li> <li>- increased energy consumption,</li> <li>- cost implications of alternatives,</li> <li>- impact on existing retail and facilities in Tallaght Town Centre due to downgrading of public transport,</li> <li>- loss of amenity of houses fronting Oldbawn Road,</li> <li>- potential impact of the emerging running track proposal on the long-term Firhouse Road/N81 route, and</li> <li>- resultant under-development of future public transport initiatives.</li> </ul> <p>(<a href="#">PMADRAFTDEVPLAN0086, Julie Kilroy, Knocklyon Network</a>)</p>	
<p><b>Material Alteration Ref. Chapter 6 - No.8</b></p>	
<p>1. Amendments to Section 6.4.2 (Traffic and Transport Management) are welcomed with regards to reference to the Trans-European Transport Networks (TEN-T) Regulations and other TII documents. (<a href="#">PMADRAFTDEVPLAN0030, Tara Spain, Transport Infrastructure Ireland</a> <a href="#">PMADRAFTDEVPLAN0085, Transport Infrastructure Irl</a>)</p>	<p><b>Chief Executive's Response and Recommendation</b></p> <p>Submission relates to Section 6.4.2 of the Draft Plan which outlines requirements for Traffic and Transport Assessments and Workforce Travel Plans. Details of the submission are acknowledged.</p> <p><b>Recommendation</b></p> <p>It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>
<p><b>Material Alteration Ref. Chapter 6 - No.9</b></p>	
<p>1. Submission notes that the National Cycle Manual is now referred to in 6.4.3 but there is still no reference to the National Cycle Policy Framework (NCPF) despite its inclusion in the current Development Plan. Submission recommends that a continued commitment to support the implementation of the NCPF should be included in Par. 6.3.0 (<a href="#">PMADRAFTDEVPLAN0054, Mairead Forsythe, Dublin Cycling Campaign</a>)</p>	<p><b>Chief Executive's Response and Recommendation</b></p> <p>Submission relates to Section 6.4.3 of the Draft Plan which refers to Road and Street Design. This section of the Draft Plan focuses on guidelines which contain standards relating to the design of roads and streets.</p> <p><b>Recommendation</b></p> <p>It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>

## Chapter 6 Summary of Recommendations

Material Alteration	Issue	Recommendation
Material Alteration Ref. Chapter 6 - No.1	Wording in Section 6.1.0	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 6 - No.2	Additional wording in Section 6.1.2 Integrated Transport Studies	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 6 – No.3	Section 6.2.0 Public Transport	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 6 - No.4	Section 6.3.0 Walking and Cycling	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 6 – No.5	Table 6.4 Six Year Cycle Network	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 6 - No.6	Section 6.4 Road and Street Network	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 6 – No.7	Medium and Long Term Road Objectives	<p>It is recommended the County Development Plan be made with the proposed Material Alteration as displayed subject to modification to reinsert details of the Firhouse-N81 Bridge and the Oldcourt-Oldbawn Bridge (including proposal, description and route) into Table 6.6 Medium to Long Term Road Objectives.</p> <p>It is recommended that the County Development Plan be made <u>without</u> the associated development plan mapping proposed Material Alteration MA.C6-07.a and MA.C6-07.b.</p>
Material Alteration Ref. Chapter 6 - No.8	Traffic and Transport Management	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.

Material Alteration Ref. Chapter 6 – No.9	Road and Street Design	It is recommended the County Development Plan be made with the proposed material alteration as displayed.
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## CHAPTER 7 - INFRASTRUCTURE & ENVIRONMENTAL QUALITY

Material Alteration Ref. Chapter 7 - No.4	
<p>1. Submission from Irish Water requests that IE1 Objective 12 (subject to proposed Material Alteration Ref. Chapter 7-No.4) be amended as follows:</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. 10 ha in the immediate vicinity of Peamount Reservoir shall be reserved for the construction of additional treated drinking water storage and any future development in the vicinity shall take cognisance of wayleaves required for the laying of pipes associated with a new reservoir and new drinking water supply. the Council shall support the extension of the existing reservoir at Saggart to provide strategic storage for the Ballymore Eustace water supply'.</p> <p>on the basis of required future infrastructure and preferred options identified under the Eastern and Midlands Water Supply Project, and specifically, to meet the needs for the strategic storage of treated drinking water.</p> <p><a href="#">(PMADRAFTDEVPLAN0031, Olwyn James, Irish Water)</a></p>	<p><b>Chief Executive's Response and Recommendation</b></p> <p>The submission from Irish Water outlines that the recently published 'Water Supply project Eastern and Midlands Region Preliminary Options Appraisal Report' identifies an emerging preferred option for abstracting water from Parteen basin as a new source of drinking water supply. The submission outlines that a terminal point reservoir is required and identifies an extension of Peamount reservoir as the most appropriate location.</p> <p>The proposed Material Alteration to the Draft Plan inserts the following objective:</p> <p><b>IE1 Objective 12:</b>  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> <p>The proposed modification in the Irish Water submission requests the extension of the objective to include specific details relating to the emerging sites at Peamount Reservoir, wayleaves and extending Ballymore Eustace Reservoir. The Chief Executive considers that the suggested objective wording is too prescriptive. It is considered that the wording of the proposed Material Alteration is adequate. Additionally, it is noted that the Draft Plan includes the following objective:</p> <p><b>IE1 Objective 5:</b>  To promote and support the implementation of the Irish Water, Water Supply Project to increase water supply capacity throughout the Dublin Region.</p> <p><b>Recommendation</b></p> <p>It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>
Material Alteration Ref. Chapter 7 - No.5	
<p>1. Submission from the EPA welcomes intention to cooperate with Dublin City Council and Dun Laoghaire Rathdown County Council in preparing</p>	<p><b>Chief Executive's Response and Recommendation</b></p> <p>The subject Material Alteration proposes the insertion of the following</p>

<p>an environmental management plan for the River Dodder and its environs but notes that the timeframe for preparation and adoption of this plan should be clarified, where possible, and notes that this plan should also seek to incorporate the second cycle of River Basin Management Plans currently being prepared, upon adoption. (<a href="#">PMADRAFTDEVPLAN0027, David Galvin, Environmental Protection Agency</a>)</p>	<p>action under IE Policy 2 of the Draft Plan:</p> <p><b>Action</b></p> <ul style="list-style-type: none"> <li>➤ <a href="#">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.</a></li> </ul> <p>The Chief Executive notes the welcoming of the action by the EPA and the suggestion that a timeframe for preparation and adoption be clarified. It is considered that the preparation of the Environmental Management Plan for the River Dodder requires consultation with the other local authorities and the allocation of resources. As such, the provision of an accurate timeframe is not possible.</p> <p><b>Recommendation</b></p> <p>It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>
<p><b>Material Alteration Ref. Chapter 7 - No.8</b></p> <ol style="list-style-type: none"> <li>1. Submission notes that a Specific Local Objective should be applied to lands at Moneenalion Commons, Baldonnell to require preparation of a site specific Flood Risk Assessment and Mitigation Strategy, prepared by a qualified person(s), to be submitted with any proposal for development on these lands. (<a href="#">PMADRAFTDEVPLAN0029, Frances Fitzgerald TD, Minister , Minister Frances Fitzgerald TD</a>)</li> <li>2. Submission requests the retention of the SLO in the Draft Plan. (<a href="#">PMADRAFTDEVPLAN0073, John Spain &amp; Associates, John Spain &amp; Associates, MLEU Dublin Ltd</a>)</li> </ol>	<p><b>Chief Executive's Response and Recommendation</b></p> <p>The subject proposed material alteration (Ref C07-08) relates to deletion of the written text of a Specific Local Objective (SLO) from Chapter 7 of the Plan. The deletion of a Specific Local Objective (SLO) mapping icon for lands at Baldonnell is subject to proposed material alteration MA 07-08.</p> <p>Additionally, the zoning of the lands are subject to proposed material alteration MA.M13. The Chief Executive response and recommendation to MA.M13 elsewhere in this report should be read in conjunction with this section.</p> <p>The Chief Executive considers that the provision of a SLO for the subject lands in an attempt to mitigate the identified flood risk in the event of development is unwarranted. Additionally, the lands are recommended to be a Rural (RU) zoning under MA.M13.</p> <p><b>Recommendation</b></p> <p>It is recommended the County Development Plan be made with the</p>

	proposed Material Alteration as displayed.
<b>Material Alteration Ref. Chapter 7 - No.12</b>	
<p>1. Submission details that the wording of amended IE9 Objective 6 restricts the future sustainable expansion of the airport to contribute to the regional economy and its inclusion will place the future viability and operational capacity of Weston Airport in significant jeopardy. Submission outlines that the future operation and enhancement of Weston, in terms of executive air travel and aviation training is of significant importance to the future growth of the aviation sector in Ireland. Submission states the objective should be removed or reworded to facilitate the sustainable growth of the airport.</p> <p>Suggested wording:</p> <p>It is the policy of the Council to safeguard the current and future operational, safety and technical requirements of Weston Aerodrome and to facilitate its ongoing development for executive and business aviation uses, within a sustainable development framework. Submission states the current wording is ambiguous and the use of the term to 'restrict further growth' does not provide sufficient clarity in terms of what is intended to be restricted i.e. the physical boundary of the airport, number of the annual aircraft movements, range of aviation uses etc.</p> <p><a href="#">(PMADRAFTDEVPLAN0083, Stephen M. Purcell, Future Analytics, Weston Aviation Aerodrome)</a></p>	<p><b>Chief Executive's Response and Recommendation</b></p> <p>The proposed Material Alteration relates to the insertion of an additional objective under IE Policy 9 of the Draft Plan as follows:</p> <p><b>IE9 Objective 6:</b>  To consolidate the development of the aerodrome within its existing setting, while facilitating small- scale ancillary uses, but to restrict further growth given its proximity to Casement Aerodrome, Dublin Airport and neighbouring suburban residential areas</p> <p>The submission from Weston Aviation Aerodrome in relation to the proposed wording of IE 9 Objective 6 is noted. The submission suggests the following wording:</p> <p>It is the policy of the Council to safeguard the current and future operational, safety and technical requirements of Weston Aerodrome and to facilitate its ongoing development for executive and business aviation uses, within a sustainable development framework</p> <p>The Chief Executive acknowledges the concern raised that the current wording is ambiguous and the use of the term to 'restrict further growth' does not provide sufficient clarity in terms of what is intended to be restricted i.e. the physical boundary of the airport, number of the annual aircraft movements, range of aviation uses etc. The Chief Executive considers that ancillary on the ground uses are acceptable and the extent of aviation operations should be consolidated. A modification to the objective wording is recommended.</p> <p><b>Recommendation</b></p> <p>It is recommended that County Development Plan be made with the proposed Material Alteration subject to modification:</p> <p><b>IE9 Objective 6:</b>  <del>To consolidate the development of the aerodrome within its existing setting, while facilitating small- scale ancillary uses, but to restrict further growth</del> <b>facilitate the development of ancillary uses at the aerodrome within its existing setting and consolidate aviation operations.</b></p>

Material Alteration Ref. Chapter 7 - No.13	
<p>1. Submission details that the objective to revert the runway classification from Code 2B to Code 1A is entirely unimplementable, contradicts existing planning consents and licensing provision, and is entirely inappropriate and should therefore be removed. The competent authority in this regard is the Irish Aviation Authority and the European Aviation Safety Agency (EASA). This objective is considered to be entirely at odds with the planning remit of the Development Plan process and should be a matter for the competent authority responsible for aviation licensing, policy and legislative matters, namely the Irish Aviation Authority.</p> <p><a href="#">(PMADRAFTDEVPLAN0083, Stephen M. Purcell, Future Analytics, Weston Aviation Aerodrome)</a></p>	<p><b>Chief Executive's Response and Recommendation</b></p> <p>The Chief Executive concurs with the submission on this issue and recommends the omission of the following Material Alteration:</p> <p><b>IE9 Objective 7:</b>  <b>To seek to revert the runway classification from Code 2B to Code 1A.</b></p> <p>The coding of the runway at Weston Aerodrome is a matter for the Irish 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 runway. The coding of the runway is linked to the length and width of the runway.</p> <p>In this context, it is considered that the content of IE9 Objective 5 of the Draft Plan 2016-2022 is relevant and adequate.</p> <p>IE9 Objective 5 - 'To restrict any further effective lengthening of the operational runway or over-run areas'</p> <p><b>Recommendation</b></p> <p>It is recommended the County Development Plan be made <u>without</u> the proposed Material Alteration as displayed.</p>

## Chapter 7 Summary of Recommendations

Material Alterations	Issue	Recommendation
Material Alteration Ref. Chapter 7 - No.4	IE1 Objective 12	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 7 - No.5	IE Policy 2	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.



Material Alteration Ref. Chapter 7 – No.8	IE Policy 3	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 7 - No.12	IE9 Objective 6	It is recommended that County Development Plan be made with the proposed Material Alteration subject to modification: IE9 Objective 6: <del>To consolidate the development of the aerodrome within its existing setting, while facilitating small scale ancillary uses, but to restrict further growth</del> <b>facilitate the development of ancillary uses at the aerodrome within its existing setting and consolidate aviation operations.</b>
Material Alteration Ref. Chapter 7 - No.13	IE9 Objective 7	It is recommended the County Development Plan be made <u>without</u> the proposed Material Alteration

## CHAPTER 8 - GREEN INFRASTRUCTURE

<p><b>Material Alteration Ref. Chapter 8 - No.2</b></p> <p>1. Submission supports Action listed under Section 8.0 (Green Infrastructure Strategy). (<a href="#">PMADRAFTDEVPLAN0088, Roger Garland, Keep Ireland Open</a>)</p>	<p><b>Chief Executive's Response and Recommendation</b> The Chief Executive notes the content of this submission.</p> <p>This proposed Material Alteration provides additional text to the Action listed under G Policy 1, as follows:</p> <p>Action</p> <ul style="list-style-type: none"> <li>➤ South Dublin County Council will develop and implement a Green Infrastructure Strategy for the County in accordance with international best practice and emerging national guidance and in consultation with key stakeholders and the public during the lifetime of the Development Plan. The Green Infrastructure 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 a spatial framework on which priorities and actions can be based and a delivery framework.</li> </ul> <p><b>Recommendation</b> It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>
<p><b>Material Alteration Ref. Chapter 8 - No.4</b></p> <p>1. It is recommended that the text is revised as follows to ensure a balanced approach: G2 Objective 13: To seek to avoid 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. (<a href="#">PMADRAFTDEVPLAN0050, Aoife Byrne, SLR Consulting Ireland Limited</a>)</p> <p>2. The Department of Arts, Heritage and the Gaeltacht welcomes the</p>	<p><b>Chief Executive's Response and Recommendation</b> The proposed Material Alteration provides for a new Objective under G Policy 2-Green Infrastructure Network, as follows: <b>G2 Objective 13:</b> To seek 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. [underline emphasis added for reference]</p>

<p>inclusion of G2 Objective 13 in relation to invasive species.  <a href="#">(PMADRAFTDEVPLAN0082, Michael Murphy, Dev. Applications Unit)</a></p>	<p>The Chief Executive notes the contents of the submission from SLR Consulting Ireland Ltd. The submission received seeks a change of text to the Material Alteration with the replacement of the word 'prevent' with the word 'avoid'. It is considered that the wording of the proposed Material Alteration with the word 'prevent' is more appropriate. No change recommended.</p> <p>The contents of the submission from the Department of Arts, Heritage and the Gaeltacht in support of Policy G2 Objective 13 are also noted.</p> <p><b>Recommendation</b>  It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>
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## Chapter 8 Summary of Recommendations

Material Alterations	Issue	Recommendation
Material Alteration Ref. Chapter 8 – No. 2	Additional text to the Action listed under Section 8.0 – Introduction	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 8 – No. 4	Change of text to the Material Alteration.	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.

## CHAPTER 9 - HERITAGE, CONSERVATION & LANDSCAPES

<p><b>Material Alteration Ref. Chapter 9 - No.1</b></p> <p>1. Submission supports proposed material alterations to Section 9.0 introduction (protection of heritage).  <a href="#">(PMADRAFTDEVPLAN0088, Roger Garland, Keep Ireland Open)</a></p>	<p><b>Chief Executive's Response and Recommendation</b>  Support in relation to the proposed Material Alteration to Section 9.0, which relates to the inclusion of text on the benefits of protecting, heritage, landscapes and archaeology, is noted.</p> <p><b>Recommendation</b>  It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>
<p><b>Material Alteration Ref. Chapter 9 - No.2</b></p> <p>1. Submission supports proposed material alterations to Section 9.1.1 (archaeological heritage) and HCL2 Objective 4 (battlefield sites).  <a href="#">(PMADRAFTDEVPLAN0088, Roger Garland, Keep Ireland Open)</a></p>	<p><b>Chief Executive's Response and Recommendation</b>  Support in relation to the proposed Material Alteration to Section 9.1.1, which relates to (inter alia) additional text on the protection of archaeological heritage and recorded monuments including battlefield sites, is noted.</p> <p><b>Recommendation</b>  It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>
<p><b>Material Alteration Ref. Chapter 9 - No.5</b></p> <p>1. Submission supports proposed material alterations to Section 9.2.0 (LCA).  <a href="#">(PMADRAFTDEVPLAN0088, Roger Garland, Keep Ireland Open)</a></p>	<p><b>Chief Executive's Response and Recommendation</b>  Support in relation to the Proposed Material Alteration to Section 9.2.0, which relates to information used to inform the LCA, is noted.</p> <p><b>Recommendation</b>  It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>
<p><b>Material Alteration Ref. Chapter 9 - No.6</b></p> <p>1. Submission supports proposed material alterations to HCL 9 Objective 3 (National Park). <a href="#">(PMADRAFTDEVPLAN0088, Roger Garland, Keep Ireland Open)</a></p>	<p><b>Chief Executive's Response and Recommendation</b>  Support in relation to the proposed Material Alteration to HCL 9 Objective 3, which relates to a rewording in relation to the expansion rather than creation of a National Park, is noted.</p>

	<p><b>Recommendation</b></p> <p>It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>
<b>Material Alteration Ref. Chapter 9 - No.8</b>	
<p>1. In relation to the commitment given under Section 9.2.0 Landscapes HCL 10 SLO1, (the redevelopment and regeneration of the site of the former Tara Co-Op), specifically the assessment findings that: '...the character of the local landscape and site features be respected in order to retain the green belt character...'; the submission from the EPA notes that the Plan should consider including a commitment to establishing an environmental management plan for the development of the site. This plan could provide for the relevant consideration and protection of landscape amenity, environmental and ecological sensitivities, and also provide for the remediation of any contaminated lands. (<a href="#">PMADRAFTDEVPLAN0027, David Galvin, Environmental Protection Agency</a>)</p> <p>2. Inclusion of HCL 10 SLO 1 (Tara Co-Op Site) as a Proposed Material Alteration is noted. It is advised that any development proposed at this location should ensure that the operating capacity and safety of the national road network is maintained in accordance with national guidelines. (<a href="#">PMADRAFTDEVPLAN0030, Tara Spain, Transport Infrastructure Ireland</a> <a href="#">PMADRAFTDEVPLAN0085, Transport Infrastructure Irl</a>)</p> <p>3. Submission supports proposed material alterations to HCL 10 Objective 4 (accessibility to Liffey Valley Park and reference to Towards a Liffey Valley Park). (<a href="#">PMADRAFTDEVPLAN0088, Roger Garland, Keep Ireland Open</a>)</p>	<p><b>Chief Executive's Response and Recommendation</b></p> <p>The subject proposed Material Alteration relates to (inter alia):</p> <ul style="list-style-type: none"> <li>• Inclusion of HCL 10 SLO 1, to facilitate the redevelopment and regeneration of the former Tara Co-Op site with a replacement development that does not compromise the heritage, biodiversity or landscape of the area including the Liffey Valley.</li> <li>• Additional text to HCL 10 Objective 4 in relation to accessibility to Liffey Valley Park and reference to 'Towards a Liffey Valley Park.'</li> </ul> <p><u>HCL 10 Objective 4 – Towards a Liffey Valley Park and Accessibility</u> Support in relation to the proposed Material Alteration to HCL 10 Objective 4, which relates to accessibility to Liffey Valley Park and reference to Towards a Liffey Valley Park, is noted.</p> <p><u>HCL 10 SLO 1 – Redevelopment of Tara Co-op Site</u> The submission of the EPA indicates that HCL 10 SLO 1 should be amended to include a commitment for an environmental management plan to include for the protection of landscape amenity, environmental and ecological sensitivities, and also provide for the remediation of any contaminated lands. Given that the subject brownfield site has been substantially developed, it is not considered that there are significant environmental and ecological sensitivities remaining making this aspect of the proposal unnecessary.</p> <p>The protection of surrounding landscape amenity is also already covered by policy on the protection of landscapes including the Liffey Valley as contained in the Draft Plan. Furthermore the SLO, as currently proposed, already provides for the protection of landscape amenity. It is therefore not considered necessary to add a further layer of complexity to this issue.</p> <p>Within the context of the EPAs indication that the site could be contaminated it is accepted that the SLO and proposed Material Alteration should be amended to require any development of the former Tara Co-Op</p>

	<p>site to be subject to an environmental management plan in relation to the remediation of any contaminated land.</p> <p>The submission of the TII in relation to maintaining the operating capacity and safety of the national road network is noted. Addressing issues of accessibility in relation to the subject brownfield site can be assessed at Development Management stage and it is not considered necessary to prescribe and pre-empt the assessment of accessibility issues at a level that is below the strategic scope of the County Development Plan and would prejudice the separate Development Management function.</p> <p><b>Recommendation</b> It is recommended that County Development Plan be made with the proposed Material Alteration subject to the following modification:</p> <p>HCL 10 Objective 4: To facilitate and support the development of the Liffey Valley (Zoning Objective 'HA – LV') as an interconnected greenway and park in collaboration with Dublin City Council, Fingal County Council, Kildare County Council, the OPW, existing landowners and community groups (including the Liffey Valley Park Alliance) to include for the identification and designation of possible future new pedestrian routes and footbridge locations <b>in accordance with Towards a Liffey Valley Park (2007) or any superseding plan. Universal accessibility for all should be promoted where environmental and built heritage sensitivities are not negatively impacted upon.</b></p> <p>HCL 10 Objective 10: To promote and support the development of a tourist amenity and educational/interpretive centre, such as a <b>demonstration</b> working mill, within the Dodder Valley.</p> <p>HCL 10 SLO 1: <b>To facilitate the redevelopment and regeneration of the site of the former Tara Co-Op with a replacement development of a scale, design and layout appropriate to its prominent location in the Liffey Valley "HA-LV" and in proximity to the M4 and the Lucan/ Leixlip urban areas. Any such development shall be subject to an environmental management plan in relation to remediation of any contaminated land and should not</b></p>
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	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 Liffey Valley.
<b>Material Alteration Ref. Chapter 9 - No.10</b>	
<p>1. Submission supports proposed material alterations to HCL Policy 16 and its associated Action (Public Rights of Way and Permissive Access Routes).  <a href="#">(PMADRAFTDEVPLAN0088, Roger Garland, Keep Ireland Open)</a></p>	<p><b>Chief Executive's Response and Recommendation</b>  Support in relation to the proposed Material Alteration to HCL Policy 16 and its associated proposed Action, which relates to the insertion of text in relation a promoting and improving access with adjoining counties and insertion of an Action to investigate rights of way, is noted.</p> <p><b>Recommendation</b>  It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>
<b>Material Alteration Ref. Chapter 9 - No.11</b>	
<p>1. Submission supports this material alteration. (Tree preservation order)  <a href="#">(PMADRAFTDEVPLAN0056, Jamie Moore, Planning Linkage Group - South Dublin County Public Participation Network )</a></p>	<p><b>Chief Executive's Response and Recommendation</b>  Support in relation to the proposed Material Alteration to Section 9.5.0 of the Draft Plan in relation to amendments on foot of the recent designation of a fourth TPO in the County, is noted.</p> <p><b>Recommendation</b>  It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>
<b>Material Alteration Ref. Chapter 9 - No.12</b>	
<p>1. Submission outlines that the proposed policy seeks to protect such sites from inappropriate development. Inappropriate development is not defined, but the accompanying text suggested that appropriate uses might include 'educational, scientific, recreational, and geo-tourism initiatives'. The continued use of quarries as quarries is not suggested. It is considered that the policy and the accompanying text on county geological sites should indicate that the ongoing operation of extractive industries is compatible with the protection and promotion of geological heritage.  <a href="#">(PMADRAFTDEVPLAN0050, Aoife Byrne, SLR Consulting Ireland Limited)</a></p>	<p><b>Chief Executive's Response and Recommendation</b>  The subject proposed Material Alteration relates to (inter alia):</p> <ul style="list-style-type: none"> <li>• Inclusion of introductory text in relation to recognising geology as an important natural heritage resource and recognition of its potential for educational, scientific, recreational and geo—tourism initiatives.</li> <li>• The designation of 4 additional County Geological Sites for Protection including Belgard Quarry, Liffey Valley Centre Road sections, N4 Lucan Cutting, Ballinascorney Quarry under Table 9.7</li> <li>• The inclusion of additional text under HCL 19 Objective 1 to clarify that protection of Geological Sites relates to County Geological Sites and inclusion of text to promote their importance through the County's</li> </ul>



<p>2. Submission objects to designation of Liffey Valley Centre Road Sections and N4 Lucan cutting as County Geological Sites on the basis of safety issues created by promotion of public access and potential preclusion of future road works. The geological interest of these sites is noted in the submission and it is advised that protection is already provided under the proposed amendments to 11.4.5 of the Draft Plan.  <a href="#">(PMADRAFTDEVPLAN0030, Tara Spain, Transport Infrastructure Ireland PMADRAFTDEVPLAN0085, Transport Infrastructure Irl)</a></p> <p>3. Submission supports proposed material alterations to Section 9.7.0 (sites of geological interest) including Table 9.7 and HCL 19 Objective 1 (County Geological Sites).  <a href="#">(PMADRAFTDEVPLAN0088, Roger Garland, Keep Ireland Open)</a></p>	<p>Heritage Plan.</p> <p>Support in relation to the proposed Material Alteration to Section 9.7.0 of the Draft Plan is noted.</p> <p>In relation to the objections to the proposed Material Alteration, it is advised that the principle of identifying County Geological Sites has already been established under the Draft Plan. The proposed Material Alteration seeks to include 4 additional sites that have already been identified as being of geological heritage value.</p> <p>Furthermore, the objective to protect designated Geological Sites from inappropriate development under HCL 19 Objective 1 was established under the Draft Plan and the proposed Material Alteration merely seeks to clarify that this relates to County Geological Sites and to promote their importance through the County's Heritage Plan.</p> <p>The designation of additional sites under the proposed Material Alteration is proposed on foot of 'An Audit of County Geological Sites in South Dublin County' (GSI, 2015) and the submissions on the Draft Plan from the GSI (Dept. of Communications Energy and Natural Resources), which advised that the 4 geological sites identified in the Audit but initially omitted from the Draft Plan's list of County Geological Sites should be included on the basis of (inter alia):</p> <ul style="list-style-type: none"> <li>- initial screening out of sites under the audit,</li> <li>- possibly candidacy of one omitted site (Belgard Quarry) for NHA status</li> <li>- absence of impact of geological site designation on the operation of quarries</li> <li>- interest in such sites being generated by quarrying activity</li> <li>- the limited impact of designation</li> <li>- absence of presumption in identification of sites that a disused quarry will not recommence operation</li> <li>- absence of impact on safety of quarries</li> </ul> <p>Within the context of the submission on the Draft Plan from the GSI it is considered that the identification of quarries and road cuttings as County Geological Sites will have minimal impact on the operation of such sites given that their geological interest has been revealed and created by</p>
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	<p>quarrying or road building activities. The status of 'County Geological Site' does not seek to increase public access to the sites or exclude permitted activities either continuing or commencing and there is no stated presumption in the Draft Plan to suggest the contrary. This includes roadworks. It is accepted that this should be clarified under the proposed Material Alteration.</p> <p>It is therefore recommended the County Development Plan be made with the proposed Material Alteration subject a modification that clarifies that, given their nature in terms of exposure of areas of geological interest, the ongoing operation of extractive industries and roadworks is considered to be generally compatible with the protection and promotion of geological heritage.</p> <p><b>Recommendation</b> It is recommended that County Development Plan be made with the proposed Material Alteration as displayed subject to the following modification:</p> <p><b>9.7.0 Sites of Geological Interest</b> Geology is recognised as an intrinsic component of the County's natural heritage resource, to be protected and promoted for its heritage value and for its potential in educational, scientific, recreational, and geo-tourism initiatives. <b>Given their nature in terms of exposure of areas of geological interest, the ongoing operation of extractive industries and roadworks is considered to be generally compatible with the protection and promotion of geological heritage.</b></p>
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## Chapter 9 Summary of Recommendations

Material Alteration	Issue	Recommendation
Material Alteration Ref. Chapter 9 - No.1	Additional text on protecting, heritage	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 9 - No.2	Additional text on protecting archaeological heritage and recorded monuments	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 9 - No.5	Information used to inform the LCA	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 9 - No.6	Text rewording in relation to the expansion of National Park	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 9 - No.8	Liffey Valley Park & Redevelopment of the Tara Co-Op site	<p>It is recommended that County Development Plan be made with the proposed Material Alteration subject to the following modification:</p> <p>HCL 10 Objective 4: To facilitate and support the development of the Liffey Valley (Zoning Objective 'HA – LV') as an interconnected greenway and park in collaboration with Dublin City Council, Fingal County Council, Kildare County Council, the OPW, existing landowners and community groups (including the Liffey Valley Park Alliance) to include for the identification and designation of possible future new pedestrian routes and footbridge locations <b>in accordance with Towards a Liffey Valley Park (2007) or any superseding plan. Universal accessibility for all should be promoted where environmental and built heritage sensitivities are not negatively impacted upon.</b></p> <p>HCL 10 Objective 10: To promote and support the development of a tourist amenity and educational/interpretive centre, such as a <b>demonstration working</b> mill, within the Dodder Valley.</p> <p><b>HCL 10 SLO 1:</b> <b>To facilitate the redevelopment and regeneration of the site of the former Tara Co-Op with a replacement development of a scale, design and layout appropriate to its prominent location in the Liffey Valley "HA-LV" and in</b></p>

		proximity to the M4 and the Lucan/ Leixlip urban areas. Any such development <b>shall be subject to an environmental management plan in relation to remediation of any contaminated land and</b> 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 Liffey Valley.
Material Alteration Ref. Chapter 9 - No.10	Additional text on access with adjoining counties and Action to investigate rights of way	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 9 - No.11	Designation of TPO	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 9 - No.12	County Geological Sites	<p>It is recommended that County Development Plan be made with the proposed Material Alteration as displayed subject to the following modification:</p> <p><b>9.7.0 Sites of Geological Interest</b></p> <p>Geology is recognised as an intrinsic component of the County's natural heritage resource, to be protected and promoted for its heritage value and for its potential in educational, scientific, recreational, and geo-tourism initiatives. <b>Given their nature in terms of exposure of areas of geological interest, the ongoing operation of extractive industries and roadworks is considered to be generally compatible with the protection and promotion of geological heritage.</b></p>

## CHAPTER 10 - ENERGY

Material Alteration Ref. Chapter 10 - No.2	
<p>1. Submission from the Department of Education and Skills notes that the requirements for all new public buildings to include green roof technologies should not apply to school buildings, as such roofs may impact on the viability of rain water harvesting in schools and impose unnecessary maintenance and operational costs on school Boards of Management to maintain the roofs, in addition to increasing the capital cost of school projects. Submission also notes that green roof provision is not required given the range of elements integral of the design of all school buildings, which already achieve the overall stated benefits of green roofs.</p> <p>Submission includes information used to calculate educational infrastructural requirements (Appendix 1), Site Suitability specifications (Appendix 2), and Department's 2016-2021 construction programme projects.</p> <p><a href="#">(PMADRAFTDEVPLAN0089, Anne Flynn, Department of Education &amp; Skills)</a></p>	<p><b>Chief Executive's Response and Recommendation</b></p> <p>Further to the submission of the Department of Education, it is acknowledged that the proposed Material Alteration will have a widespread effect on all new publicly funded buildings within the County and will impact on the capital cost and viability of such projects. This includes school buildings, hospitals, community centres, sports facilities, libraries and Garda stations etc.</p> <p>From the submission of the Department of Education, it is noted that the requirement to provide green roofs will impact on the viability and effectiveness of rainwater harvesting systems particularly for public buildings that will have a high water demand such as schools, hospitals and sports facilities. The low hot water demand in schools would also negate the need for solar panels. The use of green roof measures may therefore not be appropriate or viable for all public building developments in the County.</p> <p>Furthermore, it is considered that there are a range of options for flood alleviation and low carbon energy opportunities for each development proposal and on a case by case basis. Having regard to the submission from the Department of Education and Skills, it is considered that to prescribe the requirement of green roof technologies on all public buildings is overly prescriptive and may limit the range of flood alleviation and climate change mitigation measures that are both viable and practical on each site.</p> <p>Accordingly, it is recommend that the wording of Energy (E) Policy 2 Objective 6 be modified to promote green roofs and/or solar panels where feasibly practical and viable and to acknowledge the variety of public buildings to which the objective will relate.</p> <p><b>Recommendation</b></p> <p>It is recommended that County Development Plan be made with the proposed Material Alteration subject to the following modification:</p> <p><b>E2 Objective 6:</b>  <b>To ensure promote, where feasibly practical and viable, the provision</b></p>

	<p>of green roofs and/or solar panels or a mix of the two for all new public buildings (school buildings, hospitals, community centres, sports facilities, libraries, Garda stations etc.), include green roofs and/or solar panels or a mix of the two for flood alleviation, insulation and the supply of low carbon renewable energy and/or heating alternatives, and to actively promote these measures where appropriate in new commercial and industrial buildings.</p>
<b>Material Alteration Ref. Chapter 10 - No.3</b>	
<p>1. Support the amendment which proposes the use of the Passive House standard for new residential development. However, the policy could be strengthened compared to the present wording and respectively suggests that the current wording "to support the Passive House standard" be changed to "to require the Passive House standard".  <a href="#">(PMADRAFTDEVPLAN0065, Tomás O'Leary, Passive House Academy)</a></p> <p>2. Submission commends South Dublin County Council in supporting the significant energy and environmental advantages that a passive house low energy design strategy affords across all building types. In so doing the council is demonstrating its leadership position in energy conservation and joining Dún Laoghaire Rathdown County Council in adopting this international well proven standard.</p> <p>In support of South Dublin County Council's initiative, the PHAI would therefore wish to emphasise the following points:  Passive House Standard (PHS) is the leading international low energy design methodology  PHS sits comfortably within the existing low energy strategies existant within Ireland including DEAP, Part L and the quality aspirations of S.I 09  It requires little or no extra expenditure compared with national standards  It reflects a scientifically proven joined up technological thinking  It is the specific low energy methodology supported by the UN Intergovernmental Panel on Climate Change (IPCC)  It will contribute to reducing our national dependance on imported</p>	<p><b>Chief Executive's Response and Recommendation</b>  <u>Passive House Standard</u>  The advertised proposed Material Alteration to Section 10.2.2 of the Draft Plan, Energy (E) Policy 4 Objective 2 states</p> <p>'To support the passive house standard or equivalent for all new build in the County'.</p> <p>The wording of Energy (E) Policy 4 Objective 2 is considered appropriate in the context of the matters considered below.</p> <p>The Passive House standard (PHS) is a recognised voluntary private sector standard. PHS is different to the Near Zero Energy Buildings (nZEB) which is the standard which will be required by the Building Regulations in the near future (during the lifetime of the County Development Plan 2016-22), the nZEB will then become the norm across the State. To introduce a mandatory PH requirement in the Development Plan would result in South Dublin County Council operating to a different standard to the rest of the country.</p> <p>To build to PHS requires meeting a number of precise technical criteria (air tightness, U values, thermal bridging, mechanical heat recovery ventilation, cooling demand etc), and also requires specific on-site care and training. Passive house designers also use the passive housie planning package (PHPP) to ensure that the building design meets PHS. Furthermore, a set of specific on-site tests are required to ensure PH certification. It is likely that, nationally, considerable up-skilling of the design and construction sectors will be required in this regard. It is also considered that to require a mandatory PH requirement for all new build in the South Dublin County</p>

<p>fossil fuels It directly addresses fuel poverty thereby also providing the additional benefits of greater spending power within the community. PHS is a proven benefit to the health outcomes of its users and is a particularly beneficial living environment for older members of the community It is a proven way to ensure that the critical issue of ventilation is addressed within low energy design. This initiative sets the agenda for the quality that we now must expect from our construction and development industry.</p> <p>This submission from the PHAI outlines that they are fully aware of the challenge that this initiative sets for all those involved in building design and construction; however it creates a clear context within which professional training may proceed, tradesmen apprentices may be developed and knowledge and manufacturing centres created that will not just support the indigenous industries but create substantive international export opportunities. (<a href="#">PMADRAFTDEVPLAN0063, Shane Colclough, Passive House Association of Ireland</a>)</p> <p>3. Policy E4 Objective 2 proposes "To support the passive house standard or equivalent for all new build in the County." Supports this wording, but as per the above submission, the council are urged to adopt the similar policy as adopted by Dun Laoghaire Rathdown, which includes reference to 'where practicable'. (<a href="#">PMADRAFTDEVPLAN0052, Jeff Colley, Temple Media Ltd (trading as Passive House Plus)</a>)</p> <p>4. Submission from the Department of Education and Skills notes that the requirements for passive house standard or equivalent in all new buildings should exclude educational buildings on the basis that the Department has developed a comprehensive set of Technical Guidance Documents designed to make schools functionally, aesthetically and operationally efficient; which has let the way in setting industry standards, for example in air tightness and water saving in buildings. Submission notes that schools are designed and built in accordance with the Department's School's Technical Guidance Documents must achieve an A3 BER.</p>	<p>could prove ultimately anti-competitive.</p> <p>Applying a more onerous building standard for all new buildings in the County, that would not be in accordance with national State requirements, could significantly diminish and negatively impact the amount of construction activity in South Dublin County, for the coming years or until such time as the nZEB standards are enshrined in the National Building Regulations Standards.</p> <p>The insertion of the phrase "where reasonably practicable" could create ambiguity and would not provide the certainty and clarity that are required from County Development Plan policies and objectives , as it would allow each applicant put forward their own arguments as to why they should, or should not, accord with the PH standard. As such, the implementation and enforcement of planning permissions could not be carried out in a manner as required by the Planning and Development Act 2000 (as amended) and the Planning Regulations. Furthermore, lack of clarity and transparency on the implementation of the PHS, may result in a significant number of appeals to An Bord Pleanala, which could serve to delay the planning application process for a variety of development proposals in South Dublin County.</p> <p>It is considered that the wording of Energy (E) Policy 4 Objective 2 states 'To support the passive house standard or equivalent for all new build in the County', is satisfactory and supports the incremental changes to the national building regulations that may occur over the lifetime of the County Development Plan.</p> <p>To proceed with the mandatory requirement for PH standard at this stage would be overly onerous on both the consumer and the construction sector and could delay the delivery of new homes and other proposals being built in the County at a time when Government policy actively promotes the supply of new residential dwellings across the Country – particularly in the Dublin Region.</p> <p><b>Recommendation</b> It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>
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<p>Submission notes that on track record, specific research analysis and user feedback, the Department is aware of the significant design and construction challenges posed, and note that they would have an impact on the costs of the overall Capital Programme. Submission notes that for new schools, the National Building Regulations and EU energy standards would take precedence over the passive house standard. Submission includes information used to calculate educational infrastructural requirements (Appendix 1), Site Suitability specifications (Appendix 2), and Department's 2016-2021 construction programme projects. (<a href="#">PMADRAFTDEVPLAN0089, Anne Flynn, Department of Education &amp; Skills</a>)</p>	
<p><b>Material Alteration Ref. Chapter 10 - No.4</b></p>	
<p>1. Submission from the Department of Arts, Heritage and the Gaeltacht welcomes the proposed amendment to E8 Objective 1, which includes for the consideration of species in addition to aquatic species in relation to hydroelectric projects. (<a href="#">PMADRAFTDEVPLAN0082, Michael Murphy, Dev. Applications Unit</a>)</p>	<p><b>Chief Executive's Response and Recommendation</b> The contents of the submission is noted.</p> <p><b>Recommendation</b> It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>
<p><b>Material Alteration Ref. Chapter 10 - No.8</b></p>	
<p>1. Objection to proposed Material Alteration Ref. Chapter 10 - No.8 on the basis that the proposed material amendment objective seeks to 'continue the undergrounding' of proposed infrastructure which does not exist, and has not yet been granted planning permission. In this respect, the Proposed Material Amendment is 'presupposing' a development application which is currently before An Bord Pleanála, the determination of which has not yet been decided. EirGrid therefore requests that this proposed Material Amendment Objective be omitted. In the event that E11 Objective 1 is retained, EirGrid wishes to highlight the fact that the feasibility of the objective would require investigation, and such an undergrounding objective is likely to result in greater negative environmental impact. The submission notes that the suggested text amendment and clarification sought will ensure that the context framework for the on-going development of transmission infrastructure in South Dublin</p>	<p><b>Chief Executive's Response and Recommendation</b> It is recognised that the undergrounding of the 220Kv power lines at this location could benefit the future development of lands zoned for development in the surrounding area, including lands that form part of the Clonburris Strategic Development Zone (SDZ). The Council shall continue to work in partnership with EirGrid and all relevant stakeholders to explore the undergrounding of power lines and other related opportunities at these locations.</p> <p>It is noted that, An Bord Pleanala is currently considering a Strategic Infrastructure planning application for the development of the West Dublin 220/100 kV substation and associated works project, which includes for the removal of approximately 3 kilometres of the existing Inchicore-Maynooth 220 kV double circuit overhead line and the undergrounding of electricity cables along regional roads, local roads and adjoining lands in the vicinity.</p>



<p>County, as provided for by the Plan, will occur in the context of good planning practice and the proper planning and strategic development of the County. (<a href="#">PMADRAFTDEVPLAN0011, Lara Gough, EirGrid</a>)</p> <p>2. Submission supports the addition of E11 Objective 1 in the Draft Plan. (<a href="#">PMADRAFTDEVPLAN0029, Frances Fitzgerald TD, Minister, Minister Frances Fitzgerald TD</a>)</p> <p>3. Submission supports proposed material alterations to E11 Objective 1 (undergrounding power lines). (<a href="#">PMADRAFTDEVPLAN0088, Roger Garland, Keep Ireland Open</a>)</p>	<p>The project is located in South Dublin County and extends across the following townlands: Gollierstown, Finnstown, Adamstown, Ballymakailly, Grange, Clutterland, Kilmactalway, Milltown, Ballybane, Kilbride, Kilcarbery, Nangor, Kilmahuddrick, Esker South and Kishoge. The development includes works to be carried out within the Clonburris SDZ, Adamstown SDZ and Grange Castle Business Park.</p> <p>Having particular regard to the submission from Eirgrid, it is acknowledged that planning permission for the undergrounding of powerlines at this location has yet to be determined by An Bord Pleanala. As such it is considered that the wording of E11 Objective 1 should be amended in this context, to reflect the Council's position to support and explore the undergrounding of powerlines at this location.</p> <p><b>Recommendation</b> It is recommended that County Development Plan be made with the proposed Material Alteration subject to modification: <b>E11 Objective 1:</b> To work in conjunction with EirGrid to <del>seek to continue</del> <b>explore and support</b> the undergrounding of the 220kv power line between Foxborough and the County boundary, including in the Balgaddy and Ronanstown areas.</p>
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## Chapter 10 Summary of Recommendations

Material Alteration	Issue	Recommendation
Material Alteration Ref. Chapter 10 - No.2	South Dublin Spatial Energy Demand Analysis	It is recommended that County Development Plan be made with the proposed Material Alteration subject to the following modification: <b>E2 Objective 6:</b> <b>To ensure promote, where feasibly practical and viable, the provision of green roofs and/or solar panels or a mix of the two for all new public buildings (school buildings, hospitals, community centres, sports facilities, libraries and Garda stations etc.), include green roofs and/or solar panels or a mix of the two for flood alleviation, insulation and the supply of low carbon renewable energy and/or heating alternatives, and to actively promote these measures where appropriate in new commercial and industrial buildings.</b>
Material Alteration Ref. Chapter 10 - No.3	Passive House standard.	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 10 - No.4	E8 Objective 1	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 10 - No.8	Service Providers and Energy Facilities	Amend Energy (E) Policy 11 Objective 1 <b>E11 Objective 1:</b> <b>To work in conjunction with EirGrid to seek to continue explore and support the undergrounding of the 220kv power line between Foxborough and the County boundary, including in the Balgaddy and Ronanstown areas.</b>

## CHAPTER 11 - IMPLEMENTATION

Material Alteration Ref Chapter 11 - Zoning Tables - No. 1	
<p>1. With regard to the inclusion of 'Stadium' land use in Tables 11.2-11.16, the EPA submission notes that the Plan should consider summarising the appropriate mitigation measures required in order to justify the inclusion of this particular use classification. (<a href="#">PMADRAFTDEVPLAN0027, David Galvin, Environmental Protection Agency</a>)</p> <p>2. Submission welcomes the introduction of 'stadium' as a specific use class that is open for consideration on lands zoned for 'Major Retail Centre'. The addition of such facilities has the potential to greatly improve the identity of a major retail centre, complement the established retail offer and mix of uses, and act as an attraction in its own right that can boost tourism, attract inward investment to the County and significantly contribute to the vibrancy and vitality of major town centres such as Liffey Valley (<a href="#">PMADRAFTDEVPLAN0055, Robert McLoughlin, Bilfinger GVA</a>)</p>	<p><b>Chief Executive's Response and Recommendation</b> Two submissions were received with regard to the inclusion of 'Stadium' land use in the zoning tables of the Draft Plan 2016-2022. These are addressed under the following headings for clarity:</p> <ul style="list-style-type: none"> <li>▪ EPA submission</li> <li>▪ Support for inclusion of Stadium land use</li> </ul> <p><u>EPA submission</u> The Council recognises the importance of sports facilities and is committed to ensuring that all communities have access to a range of such facilities. It is considered appropriate to include a 'Stadium' land use to meet such needs. With regard to the EPA's submission, it is noted that the specification of any such development would be addressed at Development Management/planning application stage. It is also noted that any such project would be subject to Appropriate Assessment.</p> <p>In addition, while the specification and/or exact location of a stadium development is not a matter for the County Development Plan, it is noted that the development of a sporting venue of national or regional scale such as stadia would be supported at locations served by high frequency public transport as specified under ET8 Objective 3 of the Draft Plan.</p> <p><u>Support for inclusion of 'Stadium' land use</u> The contents of the submission in support of the inclusion of a 'Stadium' land use in the zoning tables of the Draft Plan is noted.</p> <p><b>Recommendation</b> It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>
Material Alteration Ref. Chapter 11 - No.1	

<div>1. Submission notes with regard to signage (including digital signs), that provisions should be made for displays in Irish language in addition to English. (<a href="#">PMADRAFTDEVPLAN0019, Sean Treanor</a>)</div> <div>2. Submission relates specifically to digital signage and welcomes a framework for same in the County; however, requests the following amendments to text regarding Digital Signage in Table 11.19 to read as follows: RESTRICTIONS ON USE - May be considered in town centres and/or large retail precincts and at other suitable locations throughout the county. DESIGN CRITERIA - Should make a positive contribution to the public domain, omit no sound, have a minimum dwell period of 30 seconds (with a crossfade), not result in obtrusive light that will create unacceptable glare (adjusting to environmental conditions), have limited hours of operation (esp. at night), and not constitute a traffic hazard. on the basis that the existing text may unnecessarily restrict some development, with the proposed amendment allowing for the assessment of applications for digital signage on a case by case basis. (<a href="#">PMADRAFTDEVPLAN0044, Matthew McRedmond, Brock McClure Planning &amp; Development Consultants</a>)</div>	<div><b>Chief Executive's Response and Recommendation</b> Submissions relate to Section 11.2.8 of the Draft Plan which contains standards on signage. The Restrictions on Use and Design Criteria contained within Table 11.19 do not relate to the language content of signage. Any such provision would be overly prescriptive.</div> <div>It is agreed that there may be circumstances outside of town centres and/or large retail precincts where digital signage could be considered. Such instances should be assessed on merit, subject to the design criteria contained within Table 11.19.</div> <div><b>Recommendation</b> It is recommended that County Development Plan be made with the proposed Material Alteration subject to modification as follows:</div> <div><b>Table 11.19: Signage</b><table><tr><th>TYPE OF SIGNS</th><th>RESTRICTIONS ON USE</th><th>DESIGN CRITERIA</th></tr><tr><td>Digital Signs</td><td>Generally not appropriate. May be considered in town centres and/or large retail precincts <b>and at other suitable locations throughout the county.</b> Not permitted on major roads unless signage relates to traffic management and safety.</td><td>Should make a positive contribution to the public domain, omit no sound, have a minimum dwell period of 30 seconds (with a crossfade), not 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.</td></tr></table></div>	TYPE OF SIGNS	RESTRICTIONS ON USE	DESIGN CRITERIA	Digital Signs	Generally not appropriate. May be considered in town centres and/or large retail precincts <b>and at other suitable locations throughout the county.</b> Not permitted on major roads unless signage relates to traffic management and safety.	Should make a positive contribution to the public domain, omit no sound, have a minimum dwell period of 30 seconds (with a crossfade), not 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.
TYPE OF SIGNS	RESTRICTIONS ON USE	DESIGN CRITERIA					
Digital Signs	Generally not appropriate. May be considered in town centres and/or large retail precincts <b>and at other suitable locations throughout the county.</b> Not permitted on major roads unless signage relates to traffic management and safety.	Should make a positive contribution to the public domain, omit no sound, have a minimum dwell period of 30 seconds (with a crossfade), not 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.					
<b>Material Alteration Ref. Chapter 11 - No.2</b>							
<div>1. Submission solely concerns Table 11.21: Minimum Space Standards for Apartments. The preceding text to this table states that 'All apartments must accord with or exceed the open space and floor area standards set out in Appendix 1 of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning</div>	<div><b>Chief Executive's Response and Recommendation</b>  Material Alteration Ref Chapter 11 – No.2 includes amendments to the Minimum Space Standards for Housing and the Minimum Space Standards for Apartments. Having regard to the different policy context</div>						

<p>Authorities, DOCHLG (2015) and the minimum floor areas set out in Table 11.21'.</p> <p>It is noted that the floor area standards set out in Appendix 1 of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, DOCHLG (2015) are a minimum of 45 sq. m. for One Bedroom apartments, a minimum of 73 sq. m for Two Bedroom apartments, and 90 sq. m for Three bedroom apartments. Submission welcomes the upholding of high quality apartment standards, however, it is recommended that the Development Plan should revert to the minimum floorspace standards as set out in the recently enacted Guidelines. The DoECLG Apartment Guidelines take precedence over Planning Authority standards and it is recommended that the South Dublin Development Plan 2016-2022 reflects this for clarity purposes.</p> <p><a href="#">(PMADRAFTDEVPLAN0064, Niall O Byrne, New Generation Homes)</a></p> <p>2. The submission of the Department of the Environment, Community and Local Government notes the proposed changes to Tables 11.2.0 and 11.21 (minimum space standards for houses and apartments), which result in an increase of 15 sq.m in all cases for houses and apartments in the absence of evidence based qualitative or quantitative assessment. It is strongly advised that the proposed changes, which deviate from national standards, are removed and should not be adopted.</p> <p>The Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2015) specify minimum apartment standards. The proposed Material Alterations to Table 11.21 (min. apartment sizes) are substantially in excess of the minimum standards specified under the Section 28 Ministerial guidelines.</p> <p>Planning and Development Legislation requires planning authorities to consider Section 28 guidelines in the consideration of planning applications and, where such guidelines differ from the provisions of a development plan, the guidelines shall prevail and take precedence making the proposed materials alterations in relation to apartment sizes redundant.</p> <p>The proposed material alterations to Table 11.20 (min. house sizes) also substantially exceed the minimum standards detailed in Quality Housing for Sustainable communities (2007). Within this context, housing construction activity in Dublin is less than half that required to</p>	<p>of each, the Chief Executive response is categorised under the following headings:</p> <ul style="list-style-type: none"> <li>• Housing Standards</li> <li>• Apartment Standards</li> </ul> <p><u>Housing Standards</u></p> <p>The minimum standards contained within Table 11.20 of the Draft Plan for houses are based on the <i>Quality Housing for Sustainable Communities Guidelines, Department of Community Heritage and Local Government, 2007</i>. The minimum standards contained within the Draft Plan match or exceed the 'target gross floor area' for two storey houses contained within the Guidelines. These standards were determined via a process that examined the size of individual living spaces in terms of:</p> <ul style="list-style-type: none"> <li>• the normal range, and typical arrangement of, furniture for each room;</li> <li>• a reasonable degree of freedom of circulation, appropriate to the likely activities;</li> <li>• the movement of larger items of furniture into and between rooms; space for family gatherings, including occasional visitors; working area and storage facilities appropriate to the likely activities; door swings which do not interfere with other doors, furniture or circulation routes; and</li> <li>• the location of heating radiators and other service fittings in a way that does not limit the arrangement of furniture within a room.</li> </ul> <p>Increasing the minimum floor area for houses raises a number of concerns in relation to:</p> <ul style="list-style-type: none"> <li>• Cost: The increase in construction costs will inevitably be passed onto buyers. This is a particularly poignant concern given the current 'housing crisis' which is, in part, linked to construction costs and limitations on consumer borrowing.</li> <li>• Delivery of Social Housing: The increase in housing size (and associated costs) will impact on the ability of South Dublin Council to deliver its Social Housing program. As noted above this is poignant concern in the current socio-economic climate.</li> </ul>
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meet demand thus increasing pressure on social housing. Additional requirements over and above the prescribed minimum standards should therefore not be adopted in the absence of evidence based impact analysis.

One of the most significant factors impeding additional housing supply is the low marginal returns from new housing construction, which are influenced by the cost of construction. Unless viability of construction improves it will be likely that demand normally met by the private housing market will be placed on the private rental and social housing sectors. Planning authorities must therefore ensure that new construction is of good quality and is affordable.

[\(PMADRAFTDEVPLAN0090, Ciara Gilgunn, Department of Environment, Community and Local Government\)](#)

- **Delivery of Specialist Housing:** There are a number of housing tenures for which the increase in dwelling size is inappropriate. For example the occupants of elderly housing would not have the need for, or the ability to maintain, larger houses. Similar concerns would be raised in relation to student housing, sheltered housing and other forms of housing designed to cater for a short to medium term tenure.
- **Sustainability and Competitiveness:** The additional cost associated with building homes would make the county less competitive in the housing market. Developers (and subsequently buyers) could be attracted to adjoining counties outside metropolitan Dublin, contributing to less sustainable travel patterns as commuters face longer journey times into the city centre from less accessible locations.
- **Variety:** The range of house sizes available within any scheme will narrow (i.e. from smallest to largest) resulting in less variety and a more standardised approach to housing provision.
- **Evidence Base:** The proposed 15 sqm increase is not based on a quantitative or qualitative assessment and directly contradicts well researched national guidelines. As a result the proposed standards are highly susceptible to challenge (and unlikely to withstand the rigour of an appeal to An Bord Pleanála).
- **Balance and Efficiency:** The proposed 15 sqm increase is disproportionately applied to all house types, notwithstanding the number of bedrooms. This would exceed basic amenity requirements in smaller house types (i.e. one and two bedroom) and could be better allocated toward an additional bedroom.

Notwithstanding the above, concerns would be raised where all or a high proportion of houses were proposed at the minimum standard. The Draft Plan addresses this via Section 11.3.1 as follows:

*'The overall dwelling mix in residential schemes should provide for a balanced range of dwelling types and sizes to support a variety of household types'.*

and

*'All houses must be required to accord with or exceed the minimum floor area standards set out in Table 11.20. Dwellings should also be designed to provide adequate room sizes that*

	<p><i>create good quality and adaptable living spaces’.</i></p> <p>This will ensure that a balanced approach is taken in order to promote greater choice and a diverse range of tenures within a tenuous housing market.</p> <p>It is recommended the County Development Plan be made <u>without</u> the increase in Minimum Space Standards for Housing.</p> <p><u>Apartment Standards</u></p> <p>Minimum apartment sizes throughout the country will be determined by the <i>Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities</i>, issued by Department of the Environment, Community and Local Government in December 2015. The Guidelines were issued under Section 28 of the Planning and Development Act 2000 (as amended). All planning authorities (including An Bord Pleanála) are required to have regard to the Guidelines, and to apply any specific planning policy requirements of the Guidelines, in carrying out their functions.</p> <p>With regard to any variations to minimum apartment sizes Section 2.10 of the Guidelines states:</p> <p><i>It is a specific planning policy requirement of these guidelines that statutory development plans do not set target minimum average floor areas or requirements for additional communal facilities (e.g. common rooms or gyms) or any other aspect of apartment design that do not accord with the requirements set out in these guidelines.</i></p> <p>The proposed variation to increase the minimum standards for apartments by 15 sqm per apartment directly conflicts with the mandatory standards contained within the Guidelines and cannot therefore be applied. The inclusion of such a requirement will serve to confuse and reduce the credibility of the County Development Plan. In addition, should the Planning Authority refuse an application for development on the basis that it did not meet the minimum apartments sizes, the Council would be exposed to a claim for compensation.</p>
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	<p>It is recommended the County Development Plan be made <u>without</u> the increase in Minimum Space Standards for Apartments.</p> <p>Noting that the Material Alteration as displayed also contains amendments in relation to studio apartments and dual aspect, the Chief Executive recommends a modification to the Material Alteration.</p> <p><b>Recommendation:</b> It is recommended that County Development Plan be made with the proposed Material Alteration subject to modification as follows:</p> <ul style="list-style-type: none"> <li>• Omission of the section of the proposed Material Alteration increasing the Minimum Space Standards for all Houses in Table 11.20</li> <li>• Omission of the section of the proposed Material Alteration increasing the Minimum Space Standards for One Bedroom, Two Bedroom and Three Bedroom Apartments in Table 11.21.</li> </ul>
<p><b>Material Alteration Ref. Chapter 11 - No.6</b></p>	
<ol style="list-style-type: none"> <li>1. The text refers to the 2004 DoEHLG guidelines and the 2008 GSI guidelines. It is considered that the text should also refer to the Code of Practice between the Department of Environment, Heritage and Local Government and the Irish Concrete Federation which was published in 2009. These guidelines provide for a balanced approach to archaeological heritage in the context of the extractive industries by providing for the excavation and preservation by record of archaeological sites, if necessary. (<a href="#">PMADRAFTDEVPLAN0050, Aoife Byrne, SLR Consulting Ireland Limited</a>)</li> <li>2. Submission supports proposed material alterations to Section 11.3.8 (Extractive Industries). (<a href="#">PMADRAFTDEVPLAN0088, Roger Garland, Keep Ireland Open</a>)</li> </ol>	<p><b>Chief Executive's Response and Recommendation</b> The contents of the two submissions received with regard to the proposed Material Alteration of Section 11.3.8 of the Draft Plan regarding Extractive Industries, specifically the inclusion of reference to guidelines to be consulted when assessing development proposals for same, re-use of quarries and impacts of extractive industries, were noted.</p> <p>With regard to submission from SLR Consulting Ireland Limited, it is recommended that the list of the Code of Practice between the Department of Environment, Heritage and Local Government and the Irish Concrete Federation 2009 be included in the list of guidelines against which applications regarding extractive industries are assessed.</p> <p><b>Recommendation</b> It is recommended that County Development Plan be made with the proposed Material Alteration subject to modification as follows:</p>



	<p>Section 11.3.0 LAND USES</p> <p>11.3.8 EXTRACTIVE INDUSTRIES</p> <p>The development, intensification or diversification of activities relating to the extractive industry will be assessed having regard to the Quarries and Ancillary Activities Guidelines DEHLG, 2004 (or any superseding national policy document), <b>Code of Practice between the Department of Environment, Heritage and Local Government and the Irish Concrete Federation, 2009</b>, and the Geological Heritage Guidelines for the Extractive Industry, GSI 2008, the nature of the proposal, method of extraction, the scale of activity proposed, the impact on the adjoining road network and its effect on the environment. The Council will take into consideration 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/or re-use, and landscaping of worked sites.</p>
<b>Material Alteration Ref. Chapter 11 - No.7</b>	
<ol style="list-style-type: none"> <li>1. Submission relates to reduced permitted car parking allocations for office and related uses, specifically in the Citywest area, noting the impact of the reduced rates on the future development of same. (<a href="#">PMADRAFTDEVPLAN0028, Hugh Lynn, Davy Hickey Properties</a>)</li> <li>2. Submission supports proposed material alterations to 11.4.2 (Car Parking Standards) but indicates that the standards should be relocated to Section 6.3.0 (Walking and Cycling). (<a href="#">PMADRAFTDEVPLAN0088, Roger Garland, Keep Ireland Open</a>)</li> </ol>	<p><b>Chief Executive's Response and Recommendation</b></p> <p>Submissions relate to Section 11.4.2 of the Draft Plan which contain standards in relation to car parking. The request to alter the maximum rates of parking permitted within Citywest (i.e. Enterprise and Employment) does not directly relate to the proposed Material Alteration and cannot be considered at this stage of the process.</p> <p>Chapter 11 - Implementation is the appropriate location for Car Parking Standards within the Development Plan as it a detailed implementation standard.</p> <p><b>Recommendation</b></p> <p>It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>
<b>Material Alteration Ref. Chapter 11 - No.9</b>	
<ol style="list-style-type: none"> <li>1. Submission notes that Transport and Traffic Assessments should apply to existing traffic, apart from new proposals. (<a href="#">PMADRAFTDEVPLAN0019, Sean Treanor</a>)</li> </ol>	<p><b>Chief Executive's Response and Recommendation</b></p> <p>Submissions relate to Section 11.4.5 of Drat Plan which outline the requirements of Traffic Impact Assessments. These are required to <i>'address the impact of the proposed development on the local and</i></p>

<p>2. Submission supports proposed material alterations to Section 11.4.5 (Traffic and Transport Assessment). (<a href="#">PMADRAFTDEVPLAN0088, Roger Garland, Keep Ireland Open</a>)</p>	<p><i>broader street network</i>’.</p> <p><b>Recommendation</b> It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>
<p><b>Material Alteration Ref. Chapter 11 - No.11</b></p>	
<p>1. As outlined above, the ICF/DoEHLG guidelines (published in 2009) relate to archaeological heritage in the context of the extractive industries. It is considered that section 11.5.1 of the draft development plan should also include a reference to these guidelines. (<a href="#">PMADRAFTDEVPLAN0050, Aoife Byrne, SLR Consulting Ireland Limited</a>)</p> <p>2. Submission supports proposed materials alterations to Section 11.5.1 (archaeological heritage). (<a href="#">PMADRAFTDEVPLAN0088, Roger Garland, Keep Ireland Open</a>)</p>	<p><b>Chief Executive’s Response and Recommendation</b> The contents of the two submissions received with regard to the proposed Material Alteration of Section 11.5.1 of the Draft Plan regarding Archaeological Heritage, specifically the inclusion of reference to Emerging Historic Landscape Character Assessments, archaeological testing, archaeological excavation, and archaeological monitoring, were noted.</p> <p>With regard to submission from SLR Consulting Ireland Limited, it is noted that the list of the Code of Practice between the Department of Environment, Heritage and Local Government and the Irish Concrete Federation 2009 are recommended for inclusion in the list of guidelines against which applications regarding extractive industries are assessed (as detailed in the response and recommendation for Material Alteration Ref. Chapter 11 – No.6 in this report). Any development proposals pertaining to the extractive industry will be assessed with regard to the provisions of the Draft Plan 2016-2022, including ET Policy 10 regarding Mineral Extraction and Section 11.3.8 of the Plan. As such, it is not considered necessary to repeat the reference to the Code of Practice in Section 11.5.1.</p> <p><b>Recommendation</b> It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>
<p><b>Material Alteration Ref. Chapter 11 - No.12</b></p>	
<p>1. Submission supports proposed material alterations to Section 11.5.5 (high amenity and sensitive landscapes). (<a href="#">PMADRAFTDEVPLAN0088, Roger Garland, Keep Ireland Open</a>)</p>	<p><b>Chief Executive’s Response and Recommendation</b> Support in relation to the Proposed Material Alteration to Section 11.5.0, which relates to the inclusion of text in relation to managing development in high amenity and sensitive areas, is noted.</p>

	<p><b>Recommendation</b></p> <p>It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>
<b>Material Alteration Ref. Chapter 11 - No.18</b>	
<p>1. Submission requests the omission of a line of text from Section 11.7.0 of the Plan (subject to proposed Material Alteration Ref. Chapter 11- No.18), specifically the first line of the fourth paragraph which states: 'The Council supports the use of CEM III/a cement classification, or equivalent, in development proposals for new buildings', on the basis that</p> <ul style="list-style-type: none"> <li>- Promoting a single cement type is overly prescriptive and interferes with technical cement and concrete specification; all cement types are not approved for all construction applications.</li> <li>- Preferentially supporting a single cement type is inconsistent. The County Development Plan contains no specifications for any other construction materials, thus to do so with regard to a specific cement type is both inconsistent and inappropriate.</li> <li>- Including a cement specification in a Section on Energy Efficiency is ineffective as the choice of cement has no impact on the energy performance of buildings.</li> </ul> <p><a href="#">(PMADRAFTDEVPLAN0010, Brian Gilmore, Cement Manufacturers Ireland)</a></p>	<p><b>Chief Executive's Response and Recommendation</b></p> <p>The submission recommends the removal of the following sentence from the Draft Plan, 'The Council supports the use of CEM III/a cement classification, or equivalent, in development proposals for new buildings. The submission notes that the promotion of a single cement type is overly prescriptive, the preferential support of a single cement type is inconsistent and including a cement specification in a Development Plan is ineffective as the choice of cement has no impact on the energy performance of buildings. Having regard to the contents of the submission from Cement Manufacturers Ireland it is considered that the matter of cement classification is adequately addressed in the Building Regulations Part A (2012) Structures and other codes, and as such is not relevant to the Development Plan.</p> <p><b>Recommendation</b></p> <p>It is recommended that the County Development Plan be made with the proposed Material Alteration subject to modification:</p> <p>Section 11.7.0 Energy 11.7.2 ENERGY PERFORMANCE IN NEW BUILDINGS ... <del>The Council supports the use of CEM III/a cement classification, or equivalent, in development proposals for new buildings.</del> The use of green building methods such as BREEAM (Building Research Establishment Environmental Assessment Methodology) and LEED (Leadership in Energy Efficiency and Design) ensures a whole life cycle approach to building design including operational carbon and embodied carbon. This holistic approach results in low energy demand buildings with a significantly reduced carbon footprint and a higher commercial value.</p>

## Chapter 11 Summary of Recommendations

Material Alteration	Issue	Recommendation						
Material Alteration Ref Chapter 11 - Zoning Tables - No. 1	Stadium in Zoning Tables	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.						
Material Alteration Ref. Chapter 11 - No.1	Digital Signs	<p>It is recommended that County Development Plan be made with the proposed Material Alteration subject to modification as follows:</p> <p><b>Table 11.19: Signage</b></p> <table> <tr> <th>TYPE OF SIGNS</th><th>RESTRICTIONS ON USE</th><th>DESIGN CRITERIA</th></tr> <tr> <td>Digital Signs</td><td>Generally not appropriate. May be considered in town centres and/or large retail precincts <b>and at other suitable locations throughout the county.</b> Not permitted on major roads unless signage relates to traffic management and safety.</td><td>Should make a positive contribution to the public domain, omit no sound, have a minimum dwell period of 30 seconds (with a crossfade), not 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.</td></tr> </table>	TYPE OF SIGNS	RESTRICTIONS ON USE	DESIGN CRITERIA	Digital Signs	Generally not appropriate. May be considered in town centres and/or large retail precincts <b>and at other suitable locations throughout the county.</b> Not permitted on major roads unless signage relates to traffic management and safety.	Should make a positive contribution to the public domain, omit no sound, have a minimum dwell period of 30 seconds (with a crossfade), not 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.
TYPE OF SIGNS	RESTRICTIONS ON USE	DESIGN CRITERIA						
Digital Signs	Generally not appropriate. May be considered in town centres and/or large retail precincts <b>and at other suitable locations throughout the county.</b> Not permitted on major roads unless signage relates to traffic management and safety.	Should make a positive contribution to the public domain, omit no sound, have a minimum dwell period of 30 seconds (with a crossfade), not 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.						
Material Alteration Ref. Chapter 11 - No.2	<p>Minimum Space Standards – Housing</p> <p>Minimum Space Standards – Apartments</p>	<p>It is recommended that County Development Plan be made with the proposed Material Alteration subject to modification as follows:</p> <ul style="list-style-type: none"> <li>Omission of the section of the proposed Material Alteration increasing the Minimum Space Standards for all Houses in Table 11.20</li> <li>Omission of the section of the proposed Material Alteration increasing the Minimum Space Standards for One Bedroom, Two Bedroom and Three Bedroom Apartments in Table 11.21.</li> </ul>						

Material Alteration Ref. Chapter 11 - No.6	Extractive industries	<p>It is recommended that County Development Plan be made with the proposed Material Alteration subject to modification as follows:</p> <p>Section 11.3.0 LAND USES 11.3.8 EXTRACTIVE INDUSTRIES</p> <p>The development, intensification or diversification of activities relating to the extractive industry will be assessed having regard to the Quarries and Ancillary Activities Guidelines DEHLG, 2004 (or any superseding national policy document), <b>Code of Practice between the Department of Environment, Heritage and Local Government and the Irish Concrete Federation, 2009</b>, and the Geological Heritage Guidelines for the Extractive Industry, GSI 2008, the nature of the proposal, method of extraction, the scale of activity proposed, the impact on the adjoining road network and its effect on the environment. The Council will take into consideration 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/or re-use, and landscaping of worked sites.</p>
Material Alteration Ref. Chapter 11 - No.7	Bicycle Parking	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 11 - No.9	Traffic & Transport Assessments	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 11 - No.11	Archaeological Heritage	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 11 - No.12	Landscape	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 11 - No.18	Cement Classification	<p>It is recommended that the County Development Plan be made with the proposed Material Alteration subject to modification:</p> <p>Section 11.7.0 Energy 11.7.2 ENERGY PERFORMANCE IN NEW BUILDINGS</p>

	<p>The Council supports the use of CEM III/a cement classification, <del>or equivalent</del>, in development proposals for new buildings. The use of green building methods such as BREEAM (Building Research Establishment Environmental Assessment Methodology) and LEED (Leadership in Energy Efficiency and Design) ensures a whole life cycle approach to building design including operational carbon and embodied carbon. This holistic approach results in low energy demand buildings with a significantly reduced carbon footprint and a higher commercial value.</p>
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### SCHEDULE 3 – INTERIM HOUSING STRATEGY

Material Alteration Ref. Schedule 3 - No. 1	
<p>1. Submission notes support for proposed Material Alteration Ref. Schedule 3-No.1, specifically the proposed amendments to Part V in the Draft Plan.</p> <p><a href="#">(PMADRAFTDEVPLAN0013, Richard Butler, Cunnane Stratton Reynolds (on behalf of Edward and Joan Fox))</a></p>	<p><b>Chief Executive's Response and Recommendation</b></p> <p>The subject proposed Material Alteration relates to changes to the Interim Housing Strategy on foot of amendments to Part V (social and affordable housing) of the Planning and Development Act, 2000 under the Urban Regeneration and Housing Act, 2015.</p> <p>The support for the proposed Material Alteration is noted.</p> <p><b>Recommendation</b></p> <p>It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>

### Schedule 3 Summary of Recommendations

Material Alteration	Issue	Recommendation
Material Alteration Ref. Schedule 3 - No. 1	Housing Strategy	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.



## SCHEDULE 5 – DEFINITION OF USE CLASSES & ZONING MATRIX TABLE

Material Alteration Ref. Schedule 5 - No. 2	
<p>1. It appears that the retail terminology, as recommended by the Chief Executive, has not been applied to the entirety of the definition and the proposed definition now contains both 'net retail area' and 'net retail floorspace' (see the first line above). We submit that the definition should be amended to fully reflect the terminology 'net retail floorspace', as recommended by the Chief Executive, and in line with that contained in the Retail Planning Guidelines, 2012. It is proposed that the definition should read:</p> <p>'Shop - Major Sales Outlet Superstores in excess of 2,500 sq.m. of net retail floorspace but not greater than 5,000 sq.m net retail floorspace which are larger in scale than neighbourhood shops, or are very specialised and therefore serve a wider area including district centres and town centres.'</p> <p><a href="#">(PMADRAFTDEVPLAN0058, Robert McLoughlin, Bilfinger GVA)</a></p>	<p><b>Chief Executive's Response and Recommendation</b> The Chief Executive notes the submission and agrees that the Use Class description should read:</p> <p>'Shop - Major Sales Outlet Superstores in excess of 2,500 sq.m. of net retail floorspace but not greater than 5,000 sq.m net retail floorspace which are larger in scale than neighbourhood shops, or are very specialised and therefore serve a wider area including district centres and town centres.'</p> <p>This change corrects a typographical error in the proposed Material Alteration which referred to net retail area and net retail floorspace in the opening line. The intention of the proposed alteration is to use net retail floorspace as the area measure in accordance with the Retail Planning Guidelines (2012)</p> <p><b>Recommendation</b> It is recommended that County Development Plan be made with the proposed Material Alteration subject to modification as follows:</p> <p>Shop – Major Sales Outlet Superstores in excess of 2,500 sq.m. of <del>net retail area</del> <b>net retail floorspace</b> but not greater than 5,000 sq.m <del>net retail area</del> <b>net retail floorspace</b> which are larger in scale than neighbourhood shops, or are very specialised and therefore serve a wider area including district centres and town centres.</p>

## Schedule 5 Summary of Recommendations

Material Alteration	Issue	Recommendation
Material Alteration Ref. Schedule 5 - No. 2	Shop - Major Sales Outlet Definition	<p>It is recommended that County Development Plan be made with the proposed Material Alteration subject to modification as follows:</p> <p>Shop – Major Sales Outlet            Superstores in excess of 2,500 sq.m. of <del>net retail area</del> <b>net retail floorspace</b> but not greater than 5,000 sq.m <del>net retail area</del> <b>net retail floorspace</b> which are larger in scale than neighbourhood shops, or are very specialised and therefore serve a wider area including district centres and town centres.</p>

## COUNTY DEVELOPMENT PLAN MAPS

MA.M10	
<p>1. Submission requests that the area of proposed amendments for MA.M10 be extended to include lands at Carmelite Monastery, Firhouse in order to maintain the residential zoning and SLO ceding land to SDCC. Submission details that a claim for compensation will follow. Furthermore, submission details that the de-zoning of lands is reckless planning in time of a housing crisis and that other lands are equally close.  <a href="#">(PMADRAFTDEVPLAN0061, Noel Smyth, Fitzwilliam Real Estate Capital Ltd)</a></p>	<p><b>Chief Executive's Response and Recommendation</b>  The subject proposed Material Alteration relates to a land use zoning alteration at Firhouse Road (Firhouse Inn, Firhouse Stores and Carpark) from High Amenity – Dodder Valley (DV) to Local Centre (LC).</p> <p>The submission on the proposed Material Alterations relates to adjoining lands that are zoned High Amenity – Dodder Valley (DV) under the Draft Plan and the submission seeks to apply a residential zoning objective for the adjoining lands together with an SLO.</p> <p>Section 12(9)(c) of the Planning and Development Act 2000 (as amended) relates to the making of a development plan and states that a further modification to a material alteration shall not be made where it relates to 'an increase in the area of land zoned for any purpose'.</p> <p>The modification proposed under the subject submission, which seeks to increase the area of land zoned for residential development, would therefore be ultra vires and would contravene the Planning and Development Act 2000 (as amended) and cannot be made.</p> <p>Further to the issues raised in the submission in relation to compensation, Section 10(8) of the Planning and Development Act 2000 (as amended) relates to the contents of a development plan and states that there 'shall be no presumption in law that any land zoned in a particular development plan (including a development plan that has been varied) shall remain so zoned in any subsequent development plan'.</p> <p>The zoning of the lands that are the subject of the submission as High Amenity – Dodder Valley (DV) under the Draft County Development Plan therefore accords with Planning and Development Legislation.</p> <p><b>Recommendation</b>  It is recommended the County Development Plan be made with the</p>

	proposed Material Alteration as displayed.
<b>MA.M12</b>	
<p>1. Objection to zoning of lands adjacent to Green Isle Hotel from Open Space (OS) to Enterprise and Employment (EE) on the basis of present high density residential development in the area, poor bus service serving the area, existing congestion and capacity issues on roads in the vicinity, difficulties accessing Boot Road/N7/Village, loss of residential amenity and privacy of existing properties due to any building on the subject site, and the availability of existing vacant business units in the vicinity of the site. Submission notes that the use of the site should be confined to improving existing issues in the area, such as additional bus parking for the Green Isle Hotel, public transport parking, new free-flow slip road to the N7 or landscaped garden/park. (<a href="#">PMADRAFTDEVPLAN0005, ANTHONY WALL</a> <a href="#">PMADRAFTDEVPLAN0092, Geraldine O'Reilly</a> <a href="#">PMADRAFTDEVPLAN0093, Stephen O'Reilly</a>)</p> <p>2. Objection to zoning of lands adjacent to Green Isle Hotel from Open Space (OS) to Enterprise and Employment (EE) on the basis of negative impact of any commercial development on site on existing adjacent residential properties, unsafe access and egress to the lands due to the narrow shape of the site, existing access issues and traffic congestion in the vicinity, and resultant parking issues from the development of the site. Submission also notes development detailed in a site notice erected on the boundary of the lands in September 2014. (<a href="#">PMADRAFTDEVPLAN0006, Fintan Moore, Green Park Pharmacy</a>)</p> <p>3. Submission opposes any change from the sites current Open Space and Recreational Amenities status. (<a href="#">PMADRAFTDEVPLAN0007, Margaret McPartlan</a> <a href="#">PMADRAFTDEVPLAN0074, Bridget Ryan, Srleen Community Dev. Assoc.</a>)</p> <p>4. Objection to zoning of lands adjacent to Green Isle Hotel from Open Space (OS) to Enterprise and Employment (EE) on the basis of proximity of existing commercial/industrial areas, proximity of existing retail units and amenities, existing access issues and traffic congestion</p>	<p><b>Chief Executive's Response and Recommendation</b> The contents of the submissions in relation to the proposed Material Alteration regarding the zoning of lands adjacent to the Green Isle Hotel from Open Space (OS) to Enterprise and Employment (EE) with an objective 'To provide for enterprise and employment related uses', are noted.</p> <p>These are addressed under the following headings for clarity:</p> <ul style="list-style-type: none"> <li>▪ Principle of proposed EE zoning</li> <li>▪ Traffic and residential amenity</li> <li>▪ Impact on existing retail</li> <li>▪ Alternative uses for the subject site</li> <li>▪ Other issues</li> </ul> <p><u>Principle of proposed EE zoning</u> 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 are appropriate for an EE zoning to facilitate an infill style employment extension at this location and in this instance.</p> <p><u>Traffic and residential amenity</u> A number of submissions expressed concern in relation to the impact of any development on site on existing traffic and parking issues in the vicinity of the site. In this regard, it is noted that any development proposals on the subject site would be assessed on their merits having regard to compliance with relevant policies and objectives of the Draft Plan including impact on residential amenity and visual impact, health and safety, and parking issues and traffic implications which may include a requirement to submit a Traffic and Transport Assessment (TTA).</p>

<p>in the vicinity, residential amenity of existing residences in the vicinity, and existing residential context of the site. Submission notes that the site could be used as a grassed area for local residents use. (<a href="#">PMADRAFTDEVPLAN0009, Yvonne Stobie</a>)</p> <p>5. Objection to zoning of lands adjacent to Green Isle Hotel from Open Space (OS) to Enterprise and Employment (EE) on the basis of proximity of existing commercial/industrial space in the area, and negative impact on existing residences by reason of additional traffic and noise associated with a commercial development at the subject site. Submission notes that the land should be converted into an amenity for local residents, such as allotments. (<a href="#">PMADRAFTDEVPLAN0012, Shane O'Keeffe</a>)</p> <p>6. Objection to zoning of lands adjacent to Green Isle Hotel from Open Space (OS) to Enterprise and Employment (EE) on the basis of the availability of existing vacant units in industrial areas in the vicinity of the site, and increased traffic and footfall in the area. Submission notes that the area should instead be landscaped. (<a href="#">PMADRAFTDEVPLAN0014, Iris Murray</a>)</p> <p>7. Objection to zoning of lands adjacent to Green Isle Hotel from Open Space (OS) to Enterprise and Employment (EE). (<a href="#">PMADRAFTDEVPLAN0016, thomas rossiter</a>)</p> <p>8. Submission seeks to retain Open Space (OS) zoning of lands adjacent to Green Isle Hotel and to develop same as a Greenbelt to be maintained by the hotel or SDCC, in the interest of visual amenity. (<a href="#">PMADRAFTDEVPLAN0015, declan hanley</a>)</p> <p>9. Objection to zoning of lands adjacent to Green Isle Hotel from Open Space (OS) to Enterprise and Employment (EE) zoning. (<a href="#">PMADRAFTDEVPLAN0018, Ronan Dunne</a>)</p> <p>10. Objection to zoning of lands adjacent to Green Isle Hotel from Open Space (OS) to Enterprise and Employment (EE). Submission notes that the subject lands should remain as open space and recreational amenity. (<a href="#">PMADRAFTDEVPLAN0022, Nicola Dunne</a>)</p>	<p><u>Impact on existing retail</u> A number of submissions expressed concern in relation to the impact of any development on site on existing retail outlets in the vicinity. In this regard, it is noted that any development proposals on the subject site would be assessed on their merits having regard to compliance with relevant policies and objectives of the Draft Plan including Chapter 5 regarding Urban Centres &amp; Retailing.</p> <p>In addition, it is noted that under EE zoning, retail-type uses comprise 'Shop-Local', 'Petrol Station' and 'Service Garage' as permitted in principle, with 'Betting Office', 'Off-Licence', 'Shop-Major Sales Outlet' and 'Shop-Neighbourhood' as not permitted.</p> <p><u>Alternative uses for the subject site</u> A number of submissions recommended alternative uses for the subject lands, including a landscaped area, public open space, greenbelt, car and bus parking, allotments, play area, youth club,</p> <p>It should also be noted that the subject site is within private ownership. The taking in charge of lands is not a matter for the County Development Plan review process and cannot be achieved or actioned through the County Development Plan, which is a strategic land use document. As such, the lands cannot be developed by the Council for the purpose of public open space or other uses noted in submissions received.</p> <p><u>Other issues</u> A number of submissions made reference to issues, such as the planning history of the subject site relative to the proposed rezoning and anti-social behaviour concerns. It is noted that these issues are not a matter for the County Development Plan which is a strategic land use document.</p> <p><b>Recommendation</b> It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>
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| <p>11. Objection to zoning of lands adjacent to Green Isle Hotel from Open Space (OS) to Enterprise and Employment (EE).<br/>(<a href="#">PMADRAFTDEVPLAN0024, Jean Redmond, N/A</a>)</p> <p>12. Objection to zoning of lands adjacent to Green Isle Hotel from Open Space (OS) to Enterprise and Employment (EE) on the basis of additional traffic generation to already congested roads in the area, negative impact on the existing residential amenity in the vicinity, increased on-road parking in the adjacent area, potential overlooking and overshadowing of existing adjacent residences by new development on site, devaluation of properties in the immediate neighbourhood, and, in the event of a commercial or industrial development, potentially hazardous emissions from the site in such a manner or quantity as may prove detrimental to the health of nearby residents and be of significant nuisance to same.<br/>(<a href="#">PMADRAFTDEVPLAN0053, Frederick Kinahan</a>)</p> <p>13. Objection to zoning of lands adjacent to Green Isle Hotel from Open Space (OS) to Enterprise and Employment (EE) on the basis of existing traffic congestion in the vicinity, and lack of amenities/facilities the adjacent residential area, particularly for children and youths. Submission notes that funding should be put towards a youth club and a play area for young children. (<a href="#">PMADRAFTDEVPLAN0046, Sinead Curran</a>)</p> <p>14. Objection to zoning of lands adjacent to Green Isle Hotel from Open Space (OS) to Enterprise and Employment (EE) on the basis of issues pertaining to road safety, and the impact of any further development of the site on same.<br/>(<a href="#">PMADRAFTDEVPLAN0034, Frank O'Connor</a>)</p> <p>15. Objection to zoning of lands adjacent to Green Isle Hotel from Open Space (OS) to Enterprise and Employment (EE) on the basis of the existing residential context of the area. Submission notes the existing recreational purpose of the subject land should be retained.<br/>(<a href="#">PMADRAFTDEVPLAN0035, pat nolan</a>)</p> <p>16. Objection to zoning of lands adjacent to Green Isle Hotel from Open</p> |  |
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Space (OS) to Enterprise and Employment (EE) on the basis of traffic and road safety.

([PMADRAFTDEVPLAN0038, Catherine Handley](#))

17. Objection to zoning of lands adjacent to Green Isle Hotel from Open Space (OS) to Enterprise and Employment (EE) on the basis of existing access issues and traffic congestion in the vicinity, potential increases to existing noise pollution levels in the area by way of further development on the site, increased traffic emission and associated health issues regarding same for residents in the area, and visual clutter of the existing road in the event that commercial units are developed on site. Submission notes that the site should retain in its recreational amenities/open space status and be planted with trees to create more oxygen to absorb the pollution from the Naas rd.

([PMADRAFTDEVPLAN0036, Donal and Margaret Bergin](#))

18. Objection to zoning of lands adjacent to Green Isle Hotel from Open Space (OS) to Enterprise and Employment (EE) on the basis of unsuitability of the location in terms of transport infrastructure, lack of recreational amenities serving the existing residential area in the vicinity, existing traffic congestion in the vicinity and commercial traffic that would result from the development of the site.

([PMADRAFTDEVPLAN0040, Mark Feeney](#))

19. Formal submission relating to proposed alteration of zoning of lands at Boot Road, Clondalkin from Open Space (OS) zoning to Enterprise and Employment (EE) zoning with an objective 'To provide for enterprise and employment related uses' South Dublin County Council Ref. MA.M12 Our client supports the continued OS zoning of the lands under the South Dublin Development Plan 2016-2022

([PMADRAFTDEVPLAN0051, Anthony Marston, Marston Planning Consultancy](#))

20. Proposed Material Alteration to mapping under is noted under MA.M12 (Boot Road, Clondalkin). It is advised that any development proposed at this location should ensure that the operating capacity and safety of the national road network is maintained in accordance with national guidelines.

([PMADRAFTDEVPLAN0030, Tara Spain, Transport Infrastructure](#))

[Ireland PMADRAFTDEVPLAN0085, Transport Infrastructure Irl\)](#)

21. Submission from local shop owner/operator raises concerns in relation to the proposed land use zoning alteration at Boot Road, Clondalkin, from Open Space (OS) to Enterprise and Employment (EE) and requests that the OS zoning should remain by reason of:
- The existence of vacant units in the Green Isle Business Park on lands zoned EE making the proposed zoning unnecessary;
  - Recent permission for retail units in the area;
  - Scope for retail development under the proposed zoning objective and the potential to draw business away from the Green Park Shopping Centre putting employment at risk;
  - Potential to reduce viability of Green Park Shopping Centre in the context of the provisions of the Development Plan on the importance of local centres;
  - Additional traffic in an area that already suffers from congestion at peak times particularly at junction between Boot Road and Naas Road.
- ([PMADRAFTDEVPLAN0045, David Cruise, David Cruise & Co.](#))
22. Submission made on behalf of educational institute opposes any changes to the Open Space and Recreational Amenities status of the Green Isle Hotel Site.
- ([PMADRAFTDEVPLAN0048, Debbie Brennan, PCI College](#))
23. Objection to zoning of lands adjacent to Green Isle Hotel from Open Space (OS) to Enterprise and Employment (EE).
- ([PMADRAFTDEVPLAN0066, Noeleen Buggy](#))
24. Objection to zoning of lands adjacent to Green Isle Hotel from Open Space (OS) to Enterprise and Employment (EE) on the basis of additional traffic, exiting traffic congestion and parking issues, lack of green spaces in the area, and the devaluation of residential properties in the area.
- ([PMADRAFTDEVPLAN0068, Veronica Edward Toolis](#))
25. Objection to zoning of lands adjacent to Green Isle Hotel from Open Space (OS) to Enterprise and Employment (EE) on the basis that
- the existing open space provides an important buffer and visual/amenity barrier between the N7 corridor and adjacent residential



areas in the vicinity,

- the zoning of the site would impact heavily on existing adjacent shopping units at Green Park Shopping Centre and Newlands Retail Centre, which appears to be in direct opposition to the strategy and policy of the Draft Plan 2016-2022 to maintain and develop the future viability of existing local centres,
- the single access of the site would result in increased traffic levels and congestion at the site and in surrounding areas; this would also result in public health and safety issues,
- the proposed EE zoning is more appropriate to large industrial/commercial type setting as already provided in nearby Grange Castle/Profile Park type developments, and recently permitted units near the Convent Road/Boot Road junction would adequately serve the area with type EE zoning.

[\(PMADRAFTDEVPLAN0069, Martin Ryan PMADRAFTDEVPLAN0095, Martin Ryan\)](#)

26. Objection to zoning of lands adjacent to Green Isle Hotel from Open Space (OS) to Enterprise and Employment (EE) on the basis that any type of commercial or industrial use of the site would be out of character with the existing roadway, and proximity of such development to existing residences. Submission notes that area should be kept as a green area or open space.

[\(PMADRAFTDEVPLAN0079, Richie Geoghegan\)](#)

27. Objection to zoning of lands adjacent to Green Isle Hotel from Open Space (OS) to Enterprise and Employment (EE) on the basis of existing parking issues in the vicinity, impact on existing retail outlets, suitability of site for construction or shopping area over a green site due to width of existing roadway, and anti-social behaviour concerns.

[\(PMADRAFTDEVPLAN0075, Paul Byrne\)](#)

28. Objection to zoning of lands adjacent to Green Isle Hotel from Open Space (OS) to Enterprise and Employment (EE) on the basis that the site is unsuitable for the proposed changes. Submission notes area should be retained as a green space with trees planted to counteract pollution and noise from the motorway.

[\(PMADRAFTDEVPLAN0081, Melissa McGuire\)](#)

<p>29. Objection to zoning of lands adjacent to Green Isle Hotel from Open Space (OS) to Enterprise and Employment (EE) on the basis that further industry on the subject site is not required due to the existing retail and services in the area. (<a href="#">PMADRAFTDEVPLAN0084, Kay Ryan</a>)</p> <p>30. Objection to zoning of lands adjacent to Green Isle Hotel from Open Space (OS) to Enterprise and Employment (EE) on the basis that the area is too small and would lead to traffic congestion. (<a href="#">PMADRAFTDEVPLAN0077, Mary Connor</a>)</p>	
<p><b>MA.M13</b></p>	
<p>1. Submission requests that lands at Moneenalion Commons, Baldonnell retain an 'EE' zoning. (<a href="#">PMADRAFTDEVPLAN0029, Frances Fitzgerald TD, Minister , Minister Frances Fitzgerald TD</a>)</p> <p>2. Detailed submission requesting the zoning of the lands be retained as Enterprise and Employment (EE) as set out in the Draft Plan. The submission outlines the following:</p> <ul style="list-style-type: none"> <li>- Very significant investment in these lands has taken place as well as advanced detailed plans for a substantial employment generating development</li> <li>-The proposed amendment does not give proper effect to the motion agreed by the Council as the area of lands that are proposed for down zoning significantly exceeds the area of lands to be downzoned on foot of the motion.</li> <li>-Inappropriate and contrary to government guidelines as well as contrary to principles of proper planning and sustainable development and the principles of natural justice to down zone a very substantial area of land which is not subject to flood risk on the grounds of flood risk concerns.</li> <li>-Submission outlines that only 32% of the subject lands are located in Flood Zone A.</li> <li>-In considering the zoning of the subject lands, it is submitted that cognisance must be taken of the clear guidance set out in the Flood Risk Guidelines, in particular, 'Planning authorities must strike a fair</li> </ul>	<p><b>Chief Executive's Response and Recommendation</b></p> <p>The subject material alteration is a mapping alteration which proposes the changing of 'EE' zoned lands in the Draft Plan to 'RU' in the finalised Development Plan. Material Alterations MA.C7-08 and C7-08 relate to an SLO for these lands and the Chief Executive recommendations on the SLO is contained elsewhere in this report.</p> <p>A detailed submission from MLEU Ltd proposes a rationale for the retention of the EE zoning at these lands. The Chief Executive acknowledges the submissions in relation to the change of the zoning of lands at Baldonnell. The Chief Executive also notes the content of submissions from the prescribed bodies at the Draft Plan stage to zone the lands to a Rural (RU) zoning due to the identified flood risk.</p> <p>Summary of the Chief Executive's decision making on the recommendation for Rural (RU) zoning of the lands:</p> <ul style="list-style-type: none"> <li>• The Chief Executive specifically commissioned a Strategic Flood Risk Assessment (SFRA) prepared by independent consultants for the County Development Plan</li> <li>• The SFRA identified a Flood Zone A sporadically dispersed on the subject lands</li> <li>• Flood Zone A has a 'High Probability of Flooding' and most types of development should be avoided.</li> <li>• The Flood Risk Guidelines outline that the zoning of lands for</li> </ul>

<p>balance between avoiding flood risk and facilitating necessary development.</p> <p>-Submission outlines the economic benefit of the zoning and extracts of the Regional Planning Guidelines.</p> <p>-Site is fully serviced (submission outlines the details in an Appendix)</p> <p>-The development of such lands will play an important role in the economy and reinforce the national importance of the GDA</p> <p>-Submitted that the rezoning of the Subject Lands on the basis of flood risk is not justified. The majority of the lands are not located within Flood Zone A and are located in Flood Zone C, the lowest category, with a small area in Flood Zone B. As part of the recent planning application (ref SD15A/0309) a Site Specific Flood Risk Assessment for the proposed logistics development demonstrates that a significant employment generating development can be accommodated on the lands with appropriate mitigation measures to mitigate flood risk. Furthermore it is demonstrated that the development of the MLEU (Mountpark) lands would actually improve the flood capacity of the site and reduce flood risk on adjoining lands and elsewhere.</p> <p>- The zoning of the Subject Lands must also be considered in the context of their strategic importance within the County. It is considered that the lands are appropriate for Employment and Enterprise use having regard to the following:</p> <p>(i) Baldonnell is located within the Dublin Metropolitan Area and defined as the Dublin and Mid East Region, a designated gateway and growth centre. The NSS recognises the importance of consolidation of the Dublin Area in order to realise a competitive city.</p> <p>(ii) This consolidation is achieved through use of strategically located lands such as these which are highly accessible and serviced for development and which provide a natural extension and consolidation of existing industrial lands. The Subject Lands are located in the Metropolitan Area of the Greater Dublin Area adjacent to the N7 corridor and in close proximity to Dublin City. They have significant potential to consolidate an existing economic base, strengthen economic activity and create employment in the South Dublin area. The lands will be developed for employment generating uses.</p> <p>(iii) The strategic location of the Subject Lands in the Metropolitan Area, with respect to their proximity to the national road network and future development requirements of the county, present an excellent</p>	<p>less vulnerable uses (such as 'EE' uses) in Flood Zone A are required to meet the criteria of the Development Plan Justification Test.</p> <ul style="list-style-type: none"> <li>• The Chief Executive considers that the subject lands does not satisfy the 3 criteria of the Justification Test as: <ul style="list-style-type: none"> <li>○ The lands are isolated from the identified urban settlements for growth in the County under the RPGs,</li> <li>○ The lands are not essential to facilitate regeneration and/or expansion of the centre of an identified urban settlement,</li> <li>○ The lands are not within or adjoining the core of an established and designated urban settlement,</li> <li>○ The lands are not essential in achieving compact and sustainable urban growth of an urban settlement</li> <li>○ There are suitable alternative lands in areas at lower risk of flooding</li> </ul> </li> <li>• In accordance with the Flood Risk Guidelines, the Chief Executive recommends that the zoning of the site be retained as Rural (RU).</li> </ul> <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) to inform the Draft Plan was carried out for the County, with a further specific report on flood risk 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 studies incorporate the best available data and provide an evidence base on flood risk in the County. The studies identify a significant portion of the lands in question as being in Flood Zone A, with 'a high probability of flooding'.</p> <p>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 only considered in exceptional circumstances, such as in city and town centres, or in the case of essential infrastructure that cannot be located elsewhere'. These 'exceptional circumstances' require all parts of a Development Plan</p>
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<p>opportunity to create a high quality employment campus that will in particular meet the Council's objective to promote significant new economic development along defined economic corridors. Their development also clearly support policy EE5 of the County Plan which recommends that uses that generate significant levels of freight traffic locate proximate to the National road network.</p> <p>(iv) The Subject Lands are zoned and serviced and ready for economic development. In this regard their strategic importance for the County has been recognised by the Council. They have been identified as an opportunity area to support economic investment and development.</p> <p>(v) The Subject Lands form the most natural and logical extension of Baldonnell Business Park having regard to current best-practice land-use policy of promoting sequential development. The Subject Lands are located immediately adjacent the existing urban footprint.</p> <p>(vi) The development of the Subject Lands is considered essential for the sustainable growth and development of South Dublin in a location where there has already been significant public investment in key services by SDCC, including foul services and watermains.</p> <p>(vii) The Subject Lands are considered to be significantly under-utilised lands, having regard to the fact that they are zoned and serviced and their strategic location immediately adjacent to the N7 economic corridor. Their development is therefore necessary for the achievement of the compact and sustainable urban growth of South Dublin.</p> <p>(viii) The development of the Subject Lands will also provide for the delivery of a critical mass of economic development which will support increased investment in the area, promote sustainable development and therefore result in both direct and indirect planning benefits to the County.</p> <p>Submitted that the basis of the Chief Executive's assessment on the extent of the lands considered to be subject of flood risk is based on the RPS SFRA which utilised CFRAM mapping. With regard to the CFRAM mapping, Circular PL 2/2014 issued by the Department of Environment Heritage and Local Government is of particular relevance. Submitted that the CFRAM mapping which the Strategic Flood Risk Assessment used to inform the Draft Plan is not sufficiently detailed to fully quantify the flood risk to the subject lands.</p> <p>In the logistics development proposed, the extent of Flood Zone A is</p>	<p>Justification Test in the Guidelines to be met.</p> <p>Section 4 of the Flood Risk Guidelines relates specifically to "existing, undeveloped, zoned areas at risk of flooding" and Sections 4.26 &amp; 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 in the these cases "planning authorities should reconsider the zoning objective" and following this reconsideration, "may decide to:</p> <ul style="list-style-type: none"> <li>• Remove the existing zoning for all types of development;</li> <li>• Reduce the zoned area and change or add zoning categories to reflect flood risk;</li> <li>• Replace the existing zoning with a zoning or specific objective for less vulnerable uses;</li> <li>• Prepare a local area plan informed by a detailed flood risk assessment to address zoning and development issues in more detail; and/or</li> <li>• Specify, in exceptional circumstances and where the criteria of the Justification Test have been met, design of structural or non-structural flood risk management measures as prerequisites to development in specific areas, ensuring that flood hazard and risk to other locations will not be increased or, if practicable, will be reduced.</li> </ul> <p>Given the extent and sporadically dispersed nature of the flood risk zone A on the lands in question, it is considered that the retention of a Rural (RU) zoning, as the lands are undeveloped, is the most appropriate course of action. This is in line with the 'precautionary approach', which requires planning authorities to consider possible future changes in flood risk including the effects of climate change. The intensive development of this area will displace the flood zone and may impact on the residents of existing dwellings downstream.</p> <p><u>CFRAM Mapping /Evidence Base</u> The submission from MLEU Ltd outlines that the CFRAM data is not sufficiently detailed and the approach of the Chief Executive to flood risk</p>
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<p>detailed as actually less than that indicated in the CFRAM analysis and that the majority of the proposed logistics development lands are actually located within Flood Zone B and C.</p> <p>Submission outlines that the response to motions on this issue is not evidenced based.</p> <p>Submission includes a submitted Development Plan Justification Test that concludes that the proposed EE employment zoning is appropriate. (<a href="#">PMADRAFTDEVPLAN0073, John Spain &amp; Associates, John Spain &amp; Associates, MLEU Dublin Ltd</a>)</p>	<p>is not evidence based. The Chief Executive notes that a Strategic Flood Risk Assessment (SFRA) was prepared by a consultant to inform the Draft Plan as part of the County Development Plan and SEA process 2016-2022, with a further specific report on flood risk also carried out subsequently due to the lands located at Moneenalion Commons being identified in the County study as having a potential risk. It is considered that this approach is adequate and in accordance with the Flood Risk Guidelines. Additionally, the Eastern CFRAM study mapping identifies areas in the County as having a potential risk. The foregoing studies incorporate the best available data and provide an evidence base on flood risk in the County. It is noted that the Flood Risk Guidelines outlines that each SFRA is designed individually to match the availability of data, scale and nature of the flood risk issues, the type of development planned and any focus on regeneration.</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 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.</p> <p><u>Strategic Location / Development Plan Justification Test</u></p> <p>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 only considered in exceptional circumstances, such as in city and town centres, or in the case of essential infrastructure that cannot be located elsewhere'.</p> <p>These 'exceptional circumstances' require all parts of a Development Plan Justification Test to be met. The Flood Risk Guidelines provide a set of criteria under Box 4.1 for the assessment of the Justification Test and outlines that where, as part of the preparation and adoption of a development plan, a planning authority is considering the future</p>
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	<p>development of areas in an urban settlement that are at moderate or high risk of flooding, all of the following criteria must be satisfied:</p> <p><u>Criteria 1.</u></p> <p>1. The urban settlement is targeted for growth under the National Spatial Strategy, Regional Planning Guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.</p> <p><u>Criteria 2.</u></p> <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:</p> <ul style="list-style-type: none"> <li>i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement (note 2 applies);</li> <li>ii) Comprises significant previously developed and/or under-utilised lands;</li> <li>iii) Is within or adjoining the core (note 3 applies) of an established or designated urban settlement;</li> <li>iv) Will be essential in achieving compact and sustainable urban growth; and</li> <li>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. (Note 4 applies)</li> </ul> <p><u>Criteria 3.</u></p> <p>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. 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>
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	<p>As part of the submission, MLEU Ltd outline that the zoning of the subject lands complies with the Development Plan Justification Test by way of strategic location within the Dublin Metropolitan Area, proximity to the N7 and Dublin City Centre. The submission identifies the whole of South Dublin County as a key urban settlement in the Dublin Metropolitan Area and proposes that this satisfies Criteria 1 of the Justification Test. The submission extrapolates this assumption to provide a context for the proposed rationale to satisfy Criteria 2 &amp; 3 above.</p> <p>The Chief Executive considers that the subject lands do not comply with the Justification Test for Development Plans of the Flood Risk Management Guidelines (2009). The Justification Test requires that the lands are within an urban settlement targeted for growth under the Regional Planning Guidelines. The Settlement Hierarchy as defined within 'Table 8 – Settlement Typology and Hierarchy' of the Regional Planning Guidelines for the Greater Dublin Area (RPGGDA) indicates that Dublin City Centre and immediate suburbs are the 'Gateway Core', while Tallaght, Clondalkin and Lucan are the defined 'Metropolitan Consolidation Towns'. No 'Large Growth Towns' 1 or 2, or 'Moderate Sustainable Growth Towns' are defined in South Dublin. Tallaght, Clondalkin and Lucan are therefore the 'urban settlements' targeted for growth within the effective Regional Planning Guidelines for the County.</p> <p>Section 4.6 of the RPGGDA defines the 'Metropolitan Area' as:  <i>Dublin City Centre, its immediate suburbs and the built up areas outside of Dublin City Centre, including a number of proximate major existing towns which are strongly integrated and connected with the built up area of Dublin.</i></p> <p>Furthermore, the policy emphasis for the Metropolitan Area is:-  <i>To gain maximum benefit from existing assets – public transport, social, infrastructural – through the continuation of consolidation and increasing densities within the existing built footprint of the City, suburbs and Consolidation and Large Growth towns.</i></p> <p>In assessing the suitability of these lands on an identified floodplain for zoning, it is noted that the lands are located in the Baldonnell area of the</p>
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	<p>County which is unconnected either physically or in terms of intensive development zoning to any of the identified RPPGDA urban settlements of Tallaght, Clondalkin or Lucan. The lands do not form part of land required for the consolidation or strengthening of these South Dublin 'urban settlements' as defined in Table 8 of the RPPGDA. The submission has incorrectly identified the whole of South Dublin County as a key urban settlement and attempts to justify the development of the lands as part of the overall development of South Dublin, however the Regional Planning Guidelines has identified three distinct Consolidation Towns as being the 'urban settlements' designated for growth within South Dublin. It is therefore considered that the identified lands are not part of an urban settlement targeted for growth under the NSS or the Regional Planning Guidelines and do not fall within Criteria 1 &amp; 2 of the Justification Test as defined within Box 4.1 of the Guidelines.</p> <p>It is considered that on the basis of the information currently available to the Planning Authority, the Justification Test cannot be met in respect of the subject lands.</p> <p>The subject lands are:-</p> <ul style="list-style-type: none"> <li>(a) Not located within Lucan, Clondalkin or Tallaght, which are identified urban settlements targeted for growth under the Regional Planning Guidelines.</li> <li>(b) Not essential to facilitate regeneration and/or expansion of the centre of an identified urban settlement,</li> <li>(c) Is not significant previously developed or underutilised lands within the urban settlement,</li> <li>(d) Is not within or adjoining the core of an established and designated urban settlement,</li> <li>(e) Will not be essential in achieving compact and sustainable urban growth of the urban settlement.</li> <li>(f) There are suitable alternative lands for the particular use or development type, in areas at lower risk of flooding</li> </ul> <p>Therefore the zoning of the identified floodplain, which is not proximate to any identified urban centres designated for growth under the Regional Planning Guidelines, for non-essential uses, would not be in accordance with the Flood Risk Guidelines or the proper planning and sustainable development of the area.</p>
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	<p><u>Extent of Land Rezoned by Motion</u></p> <p>The submission outlines that the proposed amendment does not give proper effect to the motion agreed by the Council as the area of lands that are proposed for rezoning significantly exceeds the area of lands to be rezoned on foot of the motion. The submission contends that the motion referred to 'lands at Baldonnell that are subject to a flood risk...' and the material alteration to amend the zoning should not have applied to the entire lands.</p> <p>The Chief Executive notes that the motion as debated and voted on at the Council Meeting on February 5<sup>th</sup> 2016 was accompanied by a subject lands location map. The location map clearly outlined the subject lands for the motion and the material alteration to amend the mapping was actioned based on the map.</p> <p><u>Employment</u></p> <p>The submission outlines that detailed plans for a substantial employment generating development are being advanced by MLEU Ltd. The submission does not outline the quantum or type of expected employment on the subject lands. The Chief Executive considers that alternative appropriately zoned lands are available in the wider area to accommodate employment opportunities.</p> <p><b>Recommendation</b></p> <p>It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>
<p><b>MA.C6-07.c</b></p> <ol style="list-style-type: none"> <li>1. Submission does not support this material alteration as the group believes the wrong location on the map has been marked. (<a href="#">PMADRAFTDEVPLAN0056, Jamie Moore, Planning Linkage Group - South Dublin County Public Participation Network</a>)</li> <li>2. Submission notes apparent discrepancy between Cllr Lahart's motion and the Variation Map regarding public transport lanes along Killininy Road between the M50 and Oldbawn, and requests clarification regarding same.</li> </ol>	<p><b>Chief Executive's Response and Recommendation</b></p> <p>Submissions question the implementation of a Motion. The submissions relate to Development Plan Motion 133 (Item ID 48061) of the February County Development Plan meeting which proposed:</p> <p><i>That the Development Plan 2016-2022 reflects the need to address additional traffic congestion in the Ballycullen area leading to major national road routes such as the M50</i></p> <p>Following discussion at the meeting, the Motion was agreed with</p>

<p><a href="#">(PMADRAFTDEVPLAN0086, Julie Kilroy, Knocklyon Network)</a></p>	<p>amended wording as follows:</p> <p>In the table to be added to Table 6.6 Medium to long term road objectives the middle box under Description to read:-  ‘Minor widening of the existing carriageway within the confines of the existing road’</p> <p>Material Alteration Ref Chapter 6 – No.7 includes for the agreed wording. This material alteration (REF C6-07.c) maps the agreed wording to the Book of Maps to indicate the area to which the Objective applies.</p> <p><b>Recommendation</b>  It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>
<p><b>MA.C7-08</b></p> <p>1. Submission requests the retention of EE zoning and the SLO in the Draft Plan. (<a href="#">PMADRAFTDEVPLAN0073, John Spain &amp; Associates, John Spain &amp; Associates, MLEU Dublin Ltd</a>)</p>	<p><b>Chief Executive’s Response and Recommendation</b>  The subject proposed Material Alteration (Ref MA.07-08) relates to the deletion of a Specific Local Objective (SLO) mapping icon for lands at Baldonnell. The deletion of the written text from Chapter 7 of the Plan is subject to proposed Material Alteration C7-08.</p> <p>Additionally, the zoning of the lands are subject to proposed Material Alteration MA.M13. The Chief Executive response and recommendation to MA.M13 elsewhere in this report should be read in conjunction with this section.</p> <p>The Chief Executive considers that the provision of a SLO for the subject lands in an attempt to mitigate the identified flood risk in the event of development is unwarranted. Additionally, the lands are recommended to be a Rural (RU) zoning under MA.M13.</p> <p><b>Recommendation</b>  It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.</p>

## County Development Plan Maps Summary of Recommendations

Section	Issue	Recommendation
MA.M10	Zoning at Firhouse Road	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
MA.M12	Zoning at Boot Road, Clondalkin	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
MA.M13	Zoning at Moneenalion Commons Upper & Collegeland, Baldonnell	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
MA.C6-07.c	Road Objective at Killinniny Road	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.
MA.C7-08	SLO icon at Moneenalion Commons Upper & Collegeland, Baldonnell	It is recommended the County Development Plan be made with the proposed Material Alteration as displayed.

## ACCOMPANYING DOCUMENTS

Environmental Report (Addendum 2)	
<ol style="list-style-type: none"> <li>1. Submission from the EPA notes that while the summary findings note no significant effects for some Alterations, for clarity, consideration should be given to include a summary table highlighting the key significant policies/objectives which provide the appropriate policy level mitigation measures. (<a href="#">PMADRAFTDEVPLAN0027, David Galvin, Environmental Protection Agency</a>)</li> <li>2. Submission from the EPA notes that the Alterations include a wide range of proposed residential, industrial, transport and infrastructural developments including new roads, road widening, cycle lanes, new schools and extensions, leisure complexes, water storage capacity, etc. The Plan should ensure that proposed development is prepared and implemented in accordance with the requirements of EIA, Habitats, Floods and Water Framework Directives, as appropriate. The potential for significant cumulative effects should also be considered in the context of multiple developments, on-going or proposed, over the lifetime of the Plan. (<a href="#">PMADRAFTDEVPLAN0027, David Galvin, Environmental Protection Agency</a>)</li> <li>3. Submission from the EPA notes that 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. (<a href="#">PMADRAFTDEVPLAN0027, David Galvin, Environmental Protection Agency</a>)</li> <li>4. Submission from the EPA notes that following the adoption of the amended Plan, the SEA Statement should summarise the following: <ul style="list-style-type: none"> <li>- How environmental considerations have been integrated into the Plan;</li> <li>- How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan;</li> </ul> </li> </ol>	<p><b>Chief Executive's Response and Recommendation</b></p> <p>A number of submissions were received with regard to certain aspects of the Environmental Report and Draft Plan. These are addressed under the following headings for clarity:</p> <ul style="list-style-type: none"> <li>• Mitigation Measures</li> <li>• Effects of Proposed Developments</li> <li>• Future Amendments to the Plan</li> <li>• SEA Statement</li> <li>• Proposed Bridges over Dodder</li> </ul> <p><u>Mitigation Measures</u></p> <p>The contents of the submission are noted. Section 8 of the Environmental Report details the Mitigation Measures for the Draft Plan. The SEA Statement will also detail the mitigation measures integrated into the Plan.</p> <p><b>Recommendation:</b></p> <p>It is recommended to include a table within the SEA Statement detailing the key significant policies/objectives which provide appropriate mitigation measures</p> <p><u>Effects of Proposed Developments</u></p> <p>South Dublin County Council undertakes to fulfil obligations in accordance with all EU Directives. All amendments were screened for likely significant environmental effects, including cumulative effects. A considerable number of the amendments proposed to the draft CDP will lead to significant increases in the protection that will be afforded to habitats, biodiversity, water quality, landscape, and heritage. As identified by the SEA process, a smaller number of agreed proposed amendments have the potential in general to negatively impact on these elements. The individual, cumulative, and in-combination effects of these latter amendments were assessed and judged against the overall positive and strong environmental policies in the draft CDP, including the requirement to subject any plan or project to screening for Appropriate Assessment. Furthermore, the Development Management</p>

<p>- The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and,  - The measures decided upon to monitor the significant environmental effects of implementation of the Plan.  <a href="#">(PMADRAFTDEVPLAN0027, David Galvin, Environmental Protection Agency)</a></p> <p>5. The Department of Arts, Heritage and the Gaeltacht does not see evidence of previous comments on SEA being considered. A submission on the Draft County Development Plan dated 24th September 2015 is attached to the submission on the Material Alterations as an addendum.  Conclusions in SEA screening of the Proposed Material Alterations seem oversimplified and inaccurate. For example the conclusion on the removal of the bridge across the River Dodder should indicate that this will mean no negative impacts on the landscape and biodiversity rather indicating that its removal will have a positive impact on the landscape and biodiversity. Conclusion on reducing energy use is also questioned.  <a href="#">(PMADRAFTDEVPLAN0082, Michael Murphy, Dev. Applications Unit)</a></p> <p>6. Submission notes concern that the revised SEA does not take into account the negative effects of the omission of the Firhouse-N81 and Oldcourt-Oldbawn bridges (subject to proposed Material Alteration Ref. Chapter 6-No.7), eg: Categories C1 and C2 which are in the first column of the original SEA but omitted from the revised report.  Submission notes that the proposed bridges may result in some loss of amenity in the Dodder Linear Park and cross the pNHA, but notes possible mitigation measures including the use of a free-span bridge and the carrying of the Dodder Linear Park over the public transport routes through the use of a 'Green Bridge'.  <a href="#">(PMADRAFTDEVPLAN0086, Julie Kilroy, Knocklyon Network)</a></p>	<p>Process in South Dublin County Council will provide additional monitoring of certain indicators and targets on an application by application basis. These will be recorded on an on-going basis by the Council's SEA Monitoring System. Where significant adverse effects – including positive, negative, cumulative and indirect - are likely to occur upon, for example, ecological networks as a result of the undertaking of individual projects or multiple individual projects, such instances will be identified and recorded and will feed into the monitoring evaluation for the Plan.</p> <p><b>Recommendation:</b>  No change to the Environmental Report</p> <p><u>Future Amendments to the Plan</u>  Requirements of the SEA Directive and transposing Regulations will continue to be complied with.</p> <p><b>Recommendation:</b>  No change to the Environmental Report.</p> <p><u>SEA Statement</u>  Once the Draft Plan has been adopted, the SEA Statement will be prepared and will outline the influence of the SEA process during the preparation of the Plan.</p> <p><b>Recommendation:</b>  No change to the Environmental Report.</p> <p><u>Proposed Bridges over Dodder</u>  The contents of the submission from the Departments of Arts, Heritage and the Gaeltacht are noted and accepted. It is accepted that the removal of the proposed bridges will have no negative impacts on the landscape and biodiversity; this is the sentiment expressed in the Environmental Report and Addendum Report. The environmental impact of the proposed bridges, alongside all the considerations integrated into the Plan, will be detailed in the SEA Statement</p> <p><b>Recommendation:</b>  See ENVIRONMENTAL REPORT - Response to the Environmental</p>
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	<p>Issues arising from Submissions following the public display of the Proposed Amendments to the Draft South Dublin County Development Plan 2016 – 2022 and Environmental Report - Addendum 2.</p> <p>The response to the detail of all of the submissions on the overall SEA is dealt with in the above report along with the environmental assessment of the submissions on individual alterations.</p>
<b>Appropriate Assessment Screening Report</b>	
<p>1. The Department of Arts, Heritage and the Gaeltacht does not see evidence of previous comments on AA being considered. A submission on the Draft County Development Plan dated 24th September 2015 is attached to the submission on the Material Alterations as an addendum. (<a href="#">PMADRAFTDEVPLAN0082, Michael Murphy, Dev. Applications Unit</a>)</p>	<p><b>Chief Executive's Response and Recommendation</b>  <u>Appropriate Assessment Screening Report</u>  The contents of the submission are noted. It was detailed in the Chief Executives Report (February 2016) that in the interests of clarity and to avoid confusion, Section 2 and 4 of the Screening for Appropriate Assessment report will be amended to address same. This report will be finalised with the adoption of the Draft Plan.</p> <p><b>Recommendation:</b>  Amend Section 2 (Screening Process) and 4 (Screening Assessment) of the Appropriate Assessment Screening Report.</p>

### Accompanying Documents - Summary of Recommendations

Section	Issue	Recommendation
SEA Environmental Report	Environmental Assessment	Include Table within the SEA Statement detailing the key significant policies/objectives which provide appropriate mitigation measures
Appropriate Assessment	Screening Report	Amend Section 2 (Screening Process) and 4 (Screening Assessment) of the Appropriate Assessment Screening Report

## OTHER – Issue(s) Not Related to Material Alterations

<ol style="list-style-type: none"> <li>1. Issues raised relate to the Metal Bridge in Palmerstown (RPS Ref 006), which is not subject to any of the Proposed Material Alterations or the Environmental Report (Addendum 2). Submission was submitted online under Material Alteration Ref Chapter 9 - No.10, which relates to Public Rights of Way and Permissive Access Routes. (<a href="#">PMADRAFTDEVPLAN0001, Paul Corcoran, Rebuild the Silver Bridge</a>)</li> <li>2. Submission relates to an "opening gate at Ellensborough cul de sac", which is not subject to any of the Proposed Material Alterations or the Environmental Report (Addendum 2). The submission was submitted online under the Environmental Report (Addendum 2) reference. (<a href="#">PMADRAFTDEVPLAN0002, Fiona Farrell</a>)</li> <li>3. The submission seeks details on aspects of ET Policy 6 (Greenway along the Grand Canal) and an associated Action, including its implementation, that are not subject to the Proposed Material Alterations. Text in relation to ET Policy 6 and the associated Action has been included in the Material Alterations Document to provide some background context for the Proposed Material Alterations, which are either highlighted in green, red or blue. (<a href="#">PMADRAFTDEVPLAN0003, Shane O'Brien</a>)</li> <li>4. Submission refers to proposed Material Alteration Ref. MA.M12 but relates to query regarding alleged site works/digging up of land adjacent to the Green Isle Hotel. (<a href="#">PMADRAFTDEVPLAN0004, Connie Larkin</a>)</li> <li>5. Submission made under proposed Material Alteration Ref. Chapter 3-No.3 but refers generally to Section 3.9.0 of the Draft Plan, noting that the new sports facility will be inclusive of the needs of people with disability living in the area and will support local disability specific clubs. (<a href="#">PMADRAFTDEVPLAN0021, Nathalie Dowling, Lucan Autism Network</a>)</li> <li>6. Submission made under proposed Material Alteration Ref. Chapter 3-No.1 but refers generally to Section 3.3.0 of the Draft Plan, noting that</li> </ol>	<p><b>Chief Executive's Response and Recommendation</b></p> <p>A number of submissions received referred to issues not related to the proposed Material Alterations. These are addressed under the following headings for clarity:</p> <ul style="list-style-type: none"> <li>▪ Metal Bridge Palmerstown/Silver Bridge</li> <li>▪ H3 SLO 3 – St. Brigid's Nursing Home</li> <li>▪ H8 SLO 2 - Coolamber Site</li> <li>▪ Lands adjacent to Green Isle Hotel</li> <li>▪ Universal Accessibility of sports facilities</li> <li>▪ Proposed sporting facilities in Dodder Park</li> <li>▪ Potential enforcement issues</li> <li>▪ School site identification and specification</li> <li>▪ General</li> <li>▪ EPA Submission</li> <li>▪ Cycle Network</li> <li>▪ Medium to Long Term Road Objectives</li> <li>▪ Traffic In Lucan</li> <li>▪ Zoning adjacent to Ardeevin, Lucan</li> <li>▪ Transport Infrastructure Ireland (TII)</li> <li>▪ Palmerstown Village (UC6 SLO 1)</li> <li>▪ Hospital Use in Rural Zone</li> </ul> <p><u>Metal Bridge Palmerstown/Silver Bridge</u></p> <p>The Metal Bridge in Palmerstown (RPS Ref 006) is not subject to any of the proposed Material Alterations to the Draft County Development Plan or the Environmental Report (Addendum 2). Submissions on this subject cannot be considered at this stage of the plan making process.</p> <p><b>Recommendation</b></p> <p>It is recommended the submission/s in relation to the above issue cannot be considered at this stage of the plan making process.</p> <p><u>H3 SLO 3 – St. Brigid's Nursing Home</u></p>
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<p>the needs of the community are inclusive of the needs of people with disability. Submission quotes legislation and requirements regarding same, and notes shortcomings of existing facilities. (<a href="#">PMADRAFTDEVPLAN0021, Nathalie Dowling, Lucan Autism Network</a>)</p> <p>7. Submission made under proposed Material Alteration Ref. Chapter 8-No.1 but refers generally to Section 8.0 of the Draft Plan, specifically objecting to the proposed cycle Greenway along the Dodder. Submission also notes the need to preserve the Dodder Valley Park. (<a href="#">PMADRAFTDEVPLAN0020, Graham Horgan</a>)</p> <p>8. Submission made under proposed Material Alteration Ref. Chapter 4-No.5, Chapter 8-No.1 and Ref. Chapter 8-No.2 but refers generally to Section 8.0 of the Draft Plan, specifically objecting to the proposed cycle Greenway along the Dodder. (<a href="#">PMADRAFTDEVPLAN0023, Caragh Coote</a>)</p> <p>9. Submission refers to proposed Material Alteration Ref. MA.M10 but relates to placing of a proposed running track and BMX area in Dodder Valley park. (<a href="#">PMADRAFTDEVPLAN0026, Brendan Lynch</a>)</p> <p>10. Submission from the EPA supports the consideration of a linear park/green infrastructure corridor, and notes that the Plan should integrate environmental sensitivities within the Plan area and protect and manage the appropriate use of the ecosystem services they promote. (<a href="#">PMADRAFTDEVPLAN0027, David Galvin, Environmental Protection Agency</a>)</p> <p>11. Submission includes representation from Cherryfield Dog Walkers relating the need for support for off-leash dog walking facilities in Cherryfield; the development of the Dodder Valley linear park, with specific reference to the development of a 'high-speed' cycle track which would be not conducive to the safe walking for dogs or humans; and noting that while physical activity in local environment should be encourage that it should be friendly to pet owners. (<a href="#">PMADRAFTDEVPLAN0020, Graham Horgan</a> <a href="#">PMADRAFTDEVPLAN0023, Caragh</a>)</p>	<p>Saint Brigid's Nursing Home, Crooksling is not subject to any of the proposed Material Alterations to the Draft County Development Plan or the Environmental Report (Addendum 2). Submissions on this subject cannot be considered at this stage of the plan making process.</p> <p><b>Recommendation</b> It is recommended the submission/s in relation to the above issue cannot be considered at this stage of the plan making process.</p> <p><u>H8 SLO 2 - Coolamber Site</u> H8 SLO 2 relates to the Coolamber site and the submission on this material alteration seeks to apply the proposed SLO to an area that extends substantially beyond the subject SLO site in a manner that would no longer be specific to the Coolamber site. This would essentially equate to a new material alteration and should not be considered at this stage of the plan making process.</p> <p><b>Recommendation</b> It is recommended the submission/s in relation to the above issue cannot be considered at this stage of the plan making process.</p> <p><u>Lands adjacent to Green Isle Hotel</u> Proposed Material Alteration Ref. MA.M12 related to the zoning of lands adjacent to the Green Isle Hotel, Naas Road, from Open Space (OS) to Enterprise and Employment (EE) use. A number of submissions were received in relation to the rezoning of said lands from Open Space to Residential use, which is not subject to any of the proposed Material Alterations to the Draft County Development Plan or the Environmental Report (Addendum 2). Submissions on this subject cannot be considered at this stage of the plan making process.</p> <p><b>Recommendation</b> It is recommended the submission/s in relation to the above issue cannot be considered at this stage of the plan making process.</p> <p><u>Universal Accessibility of sports facilities</u> It is the policy of the Council to promote the highest levels of universal</p>
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<p><a href="#">Coote PMADRAFTDEVPLAN0043, Pat O'Boyle PMADRAFTDEVPLAN0042, Elaine Horgan PMADRAFTDEVPLAN0041, Mary Costello PMADRAFTDEVPLAN0059, Niamh O'Reilly)</a></p> <p>12. Submission made under Material Alterations Refs. Chapter 4-No.5, Chapter 8-No.1 and Chapter 8-No.2 but refers generally to an objection to the development of the Dodder Valley Greenway cycle track, specifically noting that the Dodder Valley Park should be retained as a natural environment, and that walking should be prioritised over cycle ways. (<a href="#">PMADRAFTDEVPLAN0043, Pat O'Boyle PMADRAFTDEVPLAN0042, Elaine Horgan</a>)</p> <p>13. Submission made under Material Alterations Refs. Chapter 4-No.5, Chapter 8-No.1 and Chapter 8-No.2 but refers generally to an objection to the development of the Dodder Valley Greenway cycle track, specifically noting that the development Dodder Valley Park should take cogniance of existing users, particularly dog walkers. (<a href="#">PMADRAFTDEVPLAN0041, Mary Costello</a>)</p> <p>14. The submission seeks amendments on aspects of the Draft County Development Plan that are not subject to the Proposed Material Alterations. This includes issues raised in relation to the content of the December 2015 Chief Executive's Report on Draft Plan Consultation, roads projects listed in Table 6.6 of the Draft County Development Plan, Draft Plan policy and zoning of Liffey Valley Shopping Centre and standards in relation to the management of rural housing. (<a href="#">PMADRAFTDEVPLAN0030, Tara Spain, Transport Infrastructure Ireland PMADRAFTDEVPLAN0085, Transport Infrastructure Irl</a>)</p> <p>15. Submission refers to zoning of lands adjacent to Ardeevin from Open Space to Residential use, noting the planning history of the site, health and safety issues, and traffic and access issues pertaining to the site. (<a href="#">PMADRAFTDEVPLAN0037, PADRAIG McGARRIGLE, ARDEEVIN RESIDENTS ASSOCIATION</a>)</p> <p>16. Submission notes disappointment that our proposal to rebuild the 'Silver Bridge' between Palmerstown and the Phoenix Park and hinterland has</p>	<p>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 configuration of same is not, however, a matter for the County Development Plan.</p> <p><b>Recommendation</b> It is recommended the submission/s in relation to the above issue cannot be considered as part of the County Development Plan review process.</p> <p><u>Proposed sporting facilities in Dodder Park</u> The location of the proposed running track and BMX area in the Dodder Park is not subject to any of the proposed Material Alterations to the Draft County Development Plan or the Environmental Report (Addendum 2), or a matter for the Development Plan. Submissions on this subject cannot be considered at this stage of the plan making process.</p> <p><b>Recommendation</b> It is recommended the submission/s in relation to the above issue cannot be considered at this stage of the plan making process.</p> <p><u>Potential enforcement issues</u> Two submissions received related to alleged site works/digging up of land adjacent to the Green Isle Hotel and a request for the removal of signage at Green Isle Business Park. Issues of unauthorised development and/or planning enforcement are not a matter for the County Development Plan which is a strategic land use document, and may be addressed under the Planning Enforcement process.</p> <p><b>Recommendation</b> It is recommended the submission/s in relation to the above issue cannot be considered as part of the County Development Plan review process.</p> <p><u>School site identification and specification</u></p>
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<p>not been included. Submission notes that it would be an attractive enhancement to the public space in the area, would increase the connectivity between communities on both sides of the river, and encourage active mobility. (<a href="#">PMADRAFTDEVPLAN0054, Mairead Forsythe, Dublin Cycling Campaign</a>)</p> <p>17. Submission from DAA refers to previous submissions regarding the Draft Development Plan but notes no further comment with regard to the proposed Material Alterations. (<a href="#">PMADRAFTDEVPLAN0033, Tara Cowley, daa</a>)</p> <p>18. Submission requests that the decision to remove hospital as a use which is open for consideration in Rural Zoning. The context of the submission relates to the change of lands at Newlands Cross from Green Belt Zoning in current plan to Rural Zoning. Suggests that an SLO for this site to include hospital as an open for consideration use. (<a href="#">PMADRAFTDEVPLAN0057, Noel Smyth, Fitzwilliam Real Estate Capital Ltd</a>)</p> <p>19. Submission made under Material Alterations Refs. Chapter 4-No.5, Chapter 8-No.1 and Chapter 8-No.2 but refers generally to an objection to the development of the Dodder Valley Greenway cycle track. (<a href="#">PMADRAFTDEVPLAN0059, Niamh O'Reilly</a>)</p> <p>20. Submission made on behalf of residents' association requests that H8 SLO 2 (Coolamber Site) be amended so that additional boundaries in the area of the Coolamber Site are 'protected' for privacy and safety. The boundaries of Newcastle Road, 'Newcastle to AGP Link Road', Hayden's Lane and Hanstead are specified in the submission. (<a href="#">PMADRAFTDEVPLAN0047, John Coleman, Finnstown Priory / Cloisters Residents Association</a>)</p> <p>21. Issues raised in the submission relate to H3 SLO 3 (Saint Brigid's Nursing Home, Crooksling) of the Draft County Development Plan, which IS not subject to any of the Proposed Material Alterations or the Environmental Report (Addendum 2). This is acknowledged in the submission. Submission was submitted online under Material Alteration Ref. Chapter 2 - No.3, which relates to Proposed Material Alterations to</p>	<p>While 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 is responsible for the delivery of educational facilities and services. Any matters pertaining to site or educational facility specifications need 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><b>Recommendation</b> It is recommended the submission/s in relation to the above issue cannot be considered as part of the County Development Plan review process.</p> <p><u>General</u> A number of submissions were received which generally noted or commented on issues not subject to any of the proposed Material Alterations to the Draft County Development Plan or the Environmental Report (Addendum 2). In addition, one submission received requested the removal of a photograph attached to a previous submission made by the same individual. Due to their content, these submissions cannot be considered at this stage of the plan making process.</p> <p><b>Recommendation</b> It is recommended the submission/s in relation to the above issue cannot be considered at this stage of the plan making process.</p> <p><u>EPA Submission</u> The Chief Executive notes the contents of the submission from the EPA in support of a linear park/green infrastructure corridor. This refers to Policy HCL 10 Objective 6 which seeks 'To recognise the key role the Dodder River plays in the County's Green Infrastructure network by facilitating and supporting the continued development of the Dodder Valley (Zoning Objective 'HA – DV') as a linear park, greenway..'. '</p>
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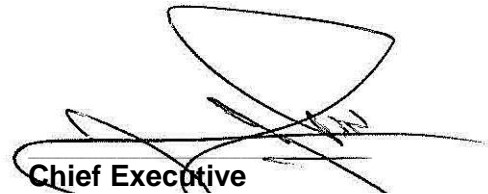
<p>H3 SLO 1 and H3 SLO 2. (<a href="#">PMADRAFTDEVPLAN0049, Jim Egan, Hughes Planning and Development Consultants</a>)</p> <p>22. Submission queries details of UC6 SLO1, which is not subject to any proposed Material Alteration. (<a href="#">PMADRAFTDEVPLAN0067, John Agar</a>)</p> <p>23. Objection to zoning of lands adjacent to Green Isle Hotel from Open Space (OS) to Residential use, which is not subject to or proposed under a Material Alteration. (<a href="#">PMADRAFTDEVPLAN0066, Noeleen Buggy</a> <a href="#">PMADRAFTDEVPLAN0079, Richie Geoghegan</a> <a href="#">PMADRAFTDEVPLAN0084, Kay Ryan</a> <a href="#">PMADRAFTDEVPLAN0077, Mary Connor</a> <a href="#">PMADRAFTDEVPLAN0053, Frederick Kinahan</a> <a href="#">PMADRAFTDEVPLAN0038, Catherine Handley</a> <a href="#">PMADRAFTDEVPLAN0018, Ronan Dunne</a>)</p> <p>24. Submission requests removal of signage at Green Isle Business Park. (<a href="#">PMADRAFTDEVPLAN0084, Kay Ryan</a>)</p> <p>25. Issues raised in the submission of the Department of the Environment, Community and Local Government relate to Table 6.6 (Medium to Long Term Road Objectives) of the Draft County Development Plan, which is not subject to any of the Proposed Material Alterations or the Environmental Report (Addendum 2). (<a href="#">PMADRAFTDEVPLAN0090, Ciara Gilgunn, Department of Environment, Community and Local Government</a>)</p> <p>26. Submission made on behalf of Lucan Planning Council raises issues in relation to traffic management and traffic management solutions in Lucan that are not subject to the Proposed Material Alterations. This includes issues raised in relation to access to the N4 from Lucan; completion of the R120; parking in Lucan Village; speed limits and 'rat running' through Lucan Village. (<a href="#">PMADRAFTDEVPLAN0070, Tom Newton, Lucan Planning Council</a>, <a href="#">Lucan Planning Council</a> <a href="#">PMADRAFTDEVPLAN0096, Tom Newton, Lucan Planning Council</a>)</p>	<p>The Chief Executive also notes the EPA's submission which states that the Development Plan should integrate environmental sensitivities within the Plan area and protect and manage the appropriate use of the ecosystem services they promote. With this regard it is considered that the policies and objectives of the Draft Development Plan are comprehensively underpinned with environmental sensitivity safeguards. Section 2.5.1 of the Draft Plan states that 'The protection of rural landscapes and of high amenity and environmentally sensitive areas is a priority of the Development Plan'. The policies and objectives of the Draft Plan reflect this.</p> <p><b>Recommendation</b> It is recommended the submission in relation to the above issue be cannot be considered as part of the County Development Plan review process.</p> <p><u>Cycle Network</u> Submissions were received in relation to Ellensborough, the Dodder Valley Greenway, Greenways more generally related to location and design of pedestrian, and cycle paths. Pedestrians and cycle paths in these locations, and the mapping of such facilities with regard to the NTA Cycle Network, are not the subject of Material Alteration. It should also be noted that all cycle routes shown with the county Development Plan are indicative only, and will be subject to a detailed route selection, design and public consultation process.</p> <p><b>Recommendation</b> It is recommended the submission/s in relation to the above issue/s cannot be considered at this stage of the plan making process.</p> <p><u>Medium to Long Term Road Objectives</u> Submissions in relation to Table 6.6 relate to access to the National Road Network (i.e. N4, N7 and M50). These are not the subject of Material Alteration and cannot be modified at this stage of the process.</p> <p><b>Recommendation</b> It is recommended the submission/s in relation to the above issue</p>
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<p>27. Submission relates to mapping of the NTA Greater Dublin Cycle Network Plan, which is not subject to any of the Proposed Material Alterations or the Environmental Report (Addendum 2). (<a href="#">PMADRAFTDEVPLAN0080, Fiona Farrell, Ellensborough Drive</a>)</p> <p>28. Submission from the Department of Education and Skills references optimal characteristics regarding school development location, for example proximate to community facilities such as sports facilities and libraries, and support for multi-campus school arrangements. Submission also includes calculations on projected population growth (based on information from Table 1.10 of the Draft Plan), and includes reference to specific site sizes required to cater for schools of certain capacity. (<a href="#">PMADRAFTDEVPLAN0089, Anne Flynn, Department of Education &amp; Skills</a>)</p> <p>29. Issues raised in relation to responses in a previous Chief Executive's Report are not directly related to any of the Proposed Material Alterations. (<a href="#">PMADRAFTDEVPLAN0088, Roger Garland, Keep Ireland Open</a>)</p> <p>30. Submission requests omission of photograph attached to previous submission (Submission Ref PMADRAFTDEVPLAN0028). (<a href="#">PMADRAFTDEVPLAN0094, Hugh Lynn</a>)</p>	<p>cannot be considered at this stage of the plan making process.</p> <p><u>Traffic In Lucan</u> Submissions in relation to traffic within the Lucan area are not directly related to any of the proposed Material Alterations and cannot be modified at this stage of the process.</p> <p><b>Recommendation</b> It is recommended the submission/s in relation to the above issue cannot be considered at this stage of the plan making process.</p> <p><u>Zoning adjacent to Ardeevin, Lucan</u> Submission received from the Ardeevin Residents Association objecting to the zoning of the site as Residential (RES). The Chief Executive acknowledges the submission on the c1 ha site adjoining Ardeevin housing development, however, the site was included as Residential (RES) zoning in the Draft Plan and there are no Material Alterations relating to the zoning of the site. As such, submissions on this site cannot be considered at this stage of the plan making process</p> <p><b>Recommendation</b> It is recommended the submission(s) in relation to the above site cannot be considered at this stage of the plan making process.</p> <p><u>Transport Infrastructure Ireland (TII)</u> Sections of the TII submission seeks amendments on aspects of the Draft County Development Plan that are not subject to the proposed Material Alterations and cannot be considered at this stage of the plan making process. This includes issues raised in relation to the content of the December 2015 Chief Executive's Report on Draft Plan Consultation, roads projects listed in Table 6.6 of the Draft County Development Plan, Draft Plan policy and zoning of Liffey Valley Shopping Centre and standards in relation to the management of rural housing.</p> <p><b>Recommendation</b> It is recommended the submission/s in relation to the above issue cannot be considered at this stage of the plan making process.</p>
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	<p><u>Palmerstown Village (UC6 SLO 1)</u></p> <p>The submission received on this issue required clarification on the location of the text in the Draft Plan for the SLO for Palmerstown Village. The SLO at Palmerstown is not subject to any of the proposed Material Alterations to the Draft County Development Plan or the Environmental Report (Addendum 2). Submissions on this subject cannot be considered at this stage of the plan making process. The submitter was contacted independently of the County Development Process to answer the query.</p> <p><b>Recommendation</b></p> <p>It is recommended the submission/s in relation to the above issue cannot be considered at this stage of the plan making process.</p> <p><u>Hospital Use in Rural Zone</u></p> <p>The amendment of the 'Hospital' land use class in the Rural (RU) Zoning objective (Table 11.16) is not subject to any of the proposed Material Alteration to the Draft County Development Plan or the Environmental Report (Addendum 2). Submissions on this subject cannot be considered at this stage of the plan making process.</p> <p><b>Recommendation</b></p> <p>It is recommended the submission/s in relation to the above issue cannot be considered at this stage of the plan making process.</p>
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## **CONCLUSION**

Taking account of directions of the members of the authority regarding the preparation of the Draft Development Plan, the proper planning and sustainable development of the County, the statutory obligations of the local authority and the relevant national policies and objectives of the Government or of any Minister of the Government; it is recommended that the proposed Material Alterations to the South Dublin County Council Development Plan 2016 – 2022 be made, modified or omitted in accordance with the recommendations of this report.



**Chief Executive**

20<sup>th</sup> April 2016

**Date**



## APPENDIX A: NEWSPAPER NOTICE



### NOTICE OF PROPOSED MATERIAL ALTERATIONS TO THE SOUTH DUBLIN COUNTY COUNCIL DRAFT DEVELOPMENT PLAN 2016 - 2022

In accordance with Section 12[7] of the Planning & Development Act, 2000 (as amended) (and Regulations made thereunder) notice is hereby given of the preparation of **Proposed Material Alterations** to the South Dublin County Council Draft Development Plan 2016-2022.

In accordance with Section 12(7)(aa) of the Planning and Development Act 2000 (as amended), the Chief Executive made a determination that a Strategic Environmental Assessment and Appropriate Assessment are not required to be carried out for the Proposed Material Alterations.

A copy of the Proposed Material Alterations, the Environmental Report (Addendum 2) and an Appropriate Assessment Screening Report which determines that the proposed Material Alterations are not likely to have significant effects on the environment/Natura 2000 sites, will be on display from **Thursday 25th February 2016 to Tuesday 29th March 2016 inclusive, Monday to Friday, excluding Bank Holidays** at the following locations:

- County Hall, Tallaght during normal opening hours.
- Council Offices, Clondalkin during normal opening hours.

A copy may be downloaded from the Council's Draft Development Plan website, <http://www.southdublindvplan.ie/>. The relevant documents may also be inspected at all branches of South Dublin Libraries.

#### Public Information Days:

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.

Written submissions or observations made on or before **4.00pm Tuesday 29th March 2016**, in relation to the **Proposed Material Alterations** only and/or the Environmental Report (Addendum 2), will be taken into consideration before the making of any amendment. [in accordance with Section 12 (7) (ad) (ii) of the Planning and Development Act 2000 (as amended)].

Submissions may be made in one of the following ways:-

- Online at [www.southdublindvplan.ie](http://www.southdublindvplan.ie)
- In writing to the Senior Executive Officer, Land Use Planning & Transport Department, County Hall, Tallaght, Dublin 24.

**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 refer to the proposed material alteration number as shown and should include your name and a contact address 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.

In accordance with Section 12 [7] of the Planning and Development Act 2000 (as amended), only submissions in relation to the proposed material alterations and/or the report on the likely significant effects on the environment of implementing the proposed material amendments will be taken into consideration.

**CLOSING DATE FOR SUBMISSIONS: 4.00pm Tuesday 29th March 2016.**

LATE SUBMISSIONS WILL NOT BE ACCEPTED.

**Eddie Taaffe, Director of Services**

**Web: [www.sdcc.ie](http://www.sdcc.ie)**





## APPENDIX B: SUMMARY OF OUTCOME - PROPOSED MATERIAL ALTERATIONS

As indicated in the main body of this report, a total of 63 proposed Material Alterations were the subject of submissions/observations and, on foot of the recommendations of the Chief Executive's Report, which affect 3 additional associated Proposed Material Alterations, it is recommended that the Development Plan:

- be made with 47 of the proposed Material Alterations as displayed;
- be made with 15 of the proposed Material Alterations as displayed subject to modification;
- be made without 4 of the proposed Material Alterations as displayed.

This leaves a large number of proposed Material Alterations that were not subject to submissions/observations and are not affected by recommendations. Such proposed Material Alterations will each be adopted as displayed unless, by resolution, the Members make the Development Plan without such proposed Material Alterations or modify such proposed Material Alterations.

The tables below identify proposed Material Alterations that are subject to recommendations contained in this report and proposed Material Alterations that were not subject to any submissions or observations, including those affected by associated recommendations, together with explanatory notes.

<b>Table 1: Material Alterations - No Submissions Received</b>	
<b>MA Reference</b>	<b>Chief Executive Recommendation</b>
Material Alteration Ref. Chapter 1 - No.1	No submissions received on this proposed Material Alteration.
Material Alteration Ref. Chapter 1 - No.2	No submissions received on this proposed Material Alteration.
Material Alteration Ref. Chapter 1 - No.4	No submissions received on this proposed Material Alteration.
Material Alteration Ref. Chapter 1 - No.5	No submissions received on this proposed Material Alteration.
Material Alteration Ref. Chapter 1 - No.6	No submissions received on this proposed Material Alteration.
Material Alteration Ref. Chapter 2 - No.2	No submissions received on this proposed Material Alteration.
Material Alteration Ref. Chapter 2 - No.6	No submissions received on this proposed Material Alteration.
Material Alteration Ref. Chapter 2 - No.7	No submissions received on this proposed Material Alteration.
Material Alteration Ref. Chapter 2 - No.8	No submissions received on this proposed Material Alteration.
Material Alteration Ref. Chapter 3 - No.1	No submissions received on this proposed Material Alteration.
Material Alteration Ref. Chapter 3 - No.2	No submissions received on this proposed Material Alteration.
Material Alteration Ref. Chapter 3 - No.5	No submissions received on this proposed Material Alteration.
Material Alteration Ref. Chapter 3 - No.6	No submissions received on this proposed Material Alteration.
Material Alteration Ref. Chapter 3 - No.7	No submissions received on this proposed Material Alteration.
Material Alteration Ref. Chapter 3 - No.8	No submissions received on this proposed Material Alteration.
Material Alteration Ref. Chapter 3 - No.9	No submissions received on this proposed Material Alteration.
Material Alteration Ref. Chapter 3 - No.10	No submissions received on this proposed Material Alteration.
Material Alteration Ref. Chapter 4 - No.1	No submissions received on this proposed Material Alteration.
Material Alteration Ref. Chapter 4 - No.2	No submissions received on this proposed Material Alteration.
Material Alteration Ref. Chapter 4 - No.8	No submissions received on this proposed Material Alteration.
Material Alteration Ref. Chapter 5 - No.2	No submissions received on this proposed Material Alteration.
Material Alteration Ref. Chapter 5 - No.4	No submissions received on this proposed Material Alteration.
Material Alteration Ref. Chapter 5 - No.5	No submissions received on this proposed Material Alteration.
Material Alteration Ref. Chapter 5 - No.6	No submissions received on this proposed Material Alteration.
Material Alteration Ref. Chapter 5 - No.7	No submissions received on this proposed Material Alteration.
Material Alteration Ref. Chapter 6 - No.10	No submissions received on this proposed Material Alteration.





Strategic Flood Risk Assessment (SFRA)	No submissions received on this accompanying document.
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\* - Recommendations in CE Report on these mapping Material Alterations to correspond with CE recommendations on Material Alterations relating to associated written text.

The proposed Material Alterations that were not subject to submissions or observations during the public consultation are listed above in Table 1. As no relevant submissions were received, the Chief Executive has not made individual recommendations on the proposed Material Alterations.

As such, on the agreement of this Chief Executive report, each of the proposed Material Alterations in Table 1 will be deemed agreed as displayed unless, by motion and subsequent resolution, the Members modify a Material Alteration or make the Development Plan without a Material Alteration.

<b>Table 2: Material Alterations - CE Recommendation to include MA in Development Plan as displayed</b>	
<b>MA Reference</b>	<b>Chief Executive Recommendation</b>
Material Alteration Ref. Chapter 1 - No.7	Recommended the CDP be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 1 - No.8	Recommended the CDP be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 1 - No.9	Recommended the CDP be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 2 - No.1	Recommended the CDP be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 2 - No.3	Recommended the CDP be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 2 - No.5	Recommended the CDP be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 3 - No.3	Recommended the CDP be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 4 - No.3	Recommended the CDP be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 4 - No.4	Recommended the CDP be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 4 - No.5	Recommended the CDP be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 4 - No.6	Recommended the CDP be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 4 - No.7	Recommended the CDP be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 4 - No.9	Recommended the CDP be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 5 - No.1	Recommended the CDP be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 5 - No.3	Recommended the CDP be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 6 - No.1	Recommended the CDP be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 6 - No.2	Recommended the CDP be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 6 - No.3	Recommended the CDP be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 6 - No.4	Recommended the CDP be made with the proposed Material Alteration as displayed.
Material Alteration Ref. Chapter 6 - No.5	Recommended the CDP be made with the proposed Material Alteration as displayed.



The proposed Material Alterations that the Chief Executive has recommended to be included in the County Development Plan as displayed at public consultation are listed above in Table 2. Please refer to the relevant section of this report for further details on the response and recommendation.

On the agreement of this Chief Executive report, each of the proposed Material Alterations in Table 2 will be agreed unless, by motion and subsequent resolution, the Members make the Development Plan with or without a proposed Material Alteration or a modified Material Alteration.

<b>Table 3: Material Alterations - CE Recommendation to include the MA in Development Plan with <u>modification</u></b>	
<b>MA Reference</b>	<b>Chief Executive Recommendation</b>
Material Alteration Ref. Chapter 1 - No.3	It is recommended that County Development Plan be made with the proposed Material Alteration as displayed subject to modification.
Material Alteration Ref. Chapter 2 - No.4	It is recommended that County Development Plan be made with the proposed Material Alteration as displayed subject to modification.
Material Alteration Ref. Chapter 3 - No.4	It is recommended that County Development Plan be made with the proposed Material Alteration as displayed subject to modification.
Material Alteration Ref. Chapter 5 - No.8	It is recommended that County Development Plan be made with the proposed Material Alteration as displayed subject to modification.
Material Alteration Ref. Chapter 6 - No.7	It is recommended that County Development Plan be made with the proposed Material Alteration as displayed subject to modification.
Material Alteration Ref. Chapter 7 - No.12	It is recommended that County Development Plan be made with the proposed Material Alteration as displayed subject to modification.
Material Alteration Ref. Chapter 9 - No.8	It is recommended that County Development Plan be made with the proposed Material Alteration as displayed subject to modification.
Material Alteration Ref. Chapter 9 - No.12	It is recommended that County Development Plan be made with the proposed Material Alteration as displayed subject to modification.
Material Alteration Ref. Chapter 10 - No.2	It is recommended that County Development Plan be made with the proposed Material Alteration as displayed subject to modification.
Material Alteration Ref. Chapter 10 - No.8	It is recommended that County Development Plan be made with the proposed Material Alteration as displayed subject to modification.
Material Alteration Ref. Chapter 11 - No.1	It is recommended that County Development Plan be made with the proposed Material Alteration as displayed subject to modification.
Material Alteration Ref. Chapter 11 - No.2	It is recommended that County Development Plan be made with the proposed Material Alteration as displayed subject to modification.
Material Alteration Ref. Chapter 11 - No.6	It is recommended that County Development Plan be made with the proposed Material Alteration as displayed subject to modification.
Material Alteration Ref. Chapter 11 - No.18	It is recommended that County Development Plan be made with the proposed Material Alteration as displayed subject to modification.

Material Alteration Ref. Schedule 5 - No. 2	It is recommended that County Development Plan be made with the proposed Material Alteration as displayed subject to modification.
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The proposed Material Alterations that the Chief Executive has recommended to be included in the County Development Plan with modification are listed above in Table 3. Please refer to the relevant section of this report for further details on the response and extent of the recommended modification.

On the agreement of this Chief Executive report, each of the proposed Material Alterations in Table 3 will be agreed as modified unless, by motion and subsequent resolution, the Members make the Development Plan with or without a proposed Material Alteration or modified Material Alteration.

<b>Table 4: Material Alterations - CE Recommendation to make Development Plan <u>without</u> the MA</b>	
<b>MA Reference</b>	<b>Chief Executive Recommendation</b>
Material Alteration Ref. Chapter 7 - No.13	It is recommended the County Development Plan be made <u>without</u> the proposed Material Alteration as displayed.

The proposed Material Alterations that the Chief Executive has recommended to be excluded from the County Development Plan are listed above. Please refer to the relevant section of this report for further details on the response and recommendation.

On the agreement of this Chief Executive report, each of the proposed Material Alterations in Table 4 above will be agreed as omitted unless, by motion and subsequent resolution, the Members make the Development Plan, with or without a Material Alteration or a modified Material Alteration.