

ENVIRONMENTAL ASSESSMENT

**Response to the Environmental Issues arising from
Submissions following the public display of the Proposed
Material Alterations to the Draft South Dublin County
Development Plan 2016 – 2022 and Environmental Report-Addendum II**

**Land Use Planning and Transportation Department,
South Dublin County Council
April 2016**

INTRODUCTION

Purpose and Contents of the Report

The purpose of this document is to report 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 report is submitted to Council Members for their consideration as part of the Chief Executives Report on the public consultation of the proposed Material Alterations to the Draft Plan.

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

A wider description of the legislative background and full list of submissions is contained within the Chief Executives Report, which this document accompanies.

This environmental assessment deals with issues contained within public submissions which relate to the environmental concerns raised within the 'Environmental Report-Addendum II'. The Addendum II document noted the detrimental or positive environmental impacts of proposed Material Alterations to the Draft Plan, should they be adopted. Responses on the alterations were submitted and assessed in order to ascertain whether the submissions would increase or decrease the environmental effects of the alterations.

A number of submissions related to wider overall issues relating to the Environmental Report or Draft Development Plan. In these instances, reasoning was provided as to compliance with legislation or national and regional plans and guidelines.

In many instances, the assessments recommended that there should be no change to the proposed Material Alterations, as the environmental impact of the alterations in question was positive, neutral or proposed to be mitigated. In other instances it was recommended that the proposed Material Alteration be subject to change in order to mitigate any impacts which may occur. In a minority of instances, it was recommended that the proposed alteration be removed from the Draft Development Plan due to the **significant residual environmental effects** of implementing the amendment. These alterations are not considered capable of mitigation.

The 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.

The assessments below are laid out in the same order as the proposed Material Alterations in the Draft Development Plan.

Material Alteration Ref. Chapter 1 - No.3	Response
<p>PMADRAFTDEVPLAN0090, Ciara Gilgunn, Department of Environment, Community and Local Government)</p> <p>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.</p>	<p>Compliance with the submission will ensure that the strategic implementation of the Draft Development Plan will adhere with the preferred development strategy as assessed and identified by the Strategic Environmental Assessment.</p>
Material Alteration Ref. Chapter 1 - No.8	
<p>(PMADRAFTDEVPLAN0027, David Galvin, Environmental Protection Agency</p> <p>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</p>	<p>The submission is noted and acknowledged. All statutory obligations will be fulfilled and complied with.</p>

consistent with the County Development Plan and Regional Planning Guidelines.	Recommendation No change
Material Alteration Ref. Chapter 1 - No.9	
<p>(PMADRAFTDEVPLAN0027, David Galvin, Environmental Protection Agency)</p> <p>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.</p>	<p>The submission is noted and acknowledged. All statutory obligations will be fulfilled and complied with.</p> <p>Recommendation No change</p>
Material Alteration Ref. Chapter 2 - No.4	Response
<p>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.</p> <p>PMADRAFTDEVPLAN0027, David Galvin, Environmental Protection Agency</p> <p>Submission objects to H8 SLO 3 (lands between Monastery Road & N7) and the associated proposed mapping amendment MA.C2-04.b by reason of the following:</p> <ul style="list-style-type: none"> - 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; - 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; - 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; - The subject lands have a long established residential zoning and the two previous County Development Plan made provision for their sustainable development; 	<p>The submissions are noted and acknowledged. The EPA support the assessment in the Environmental Report Addendum II which states that reduction in densities in established residential areas, may indirectly put pressure on development elsewhere in the County, thereby potentially negative impact on biodiversity networks, landscape and water.</p> <p>Recommendation: Material Alteration Ref. Chapter 2-No.4 should be omitted</p>

<ul style="list-style-type: none"> - 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; - 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; - 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. <p>(PMADRAFTDEVPLAN0087, Martin Maher, Serdigo (Clondalkin) Ltd.)</p>	
Material Alteration Ref. Chapter 4 - No.3	
<p>PMADRAFTDEVPLAN0027, David Galvin, Environmental Protection Agency</p> <p>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.</p> <p>Submission notes that SLO 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</p>	<p>The contents of the submissions in relation to the inclusion of ET3 SLO1 are noted. As detailed in the Environmental Report Addendum II, there are serious concerns about the environmental effects of this SLO in seeking to zone lands south of the Grand Canal.</p> <p>While it is noted that any proposal to zone these lands for employment uses (following adoption of the Plan) would be subject to SEA and AA screening, the principle of developing greenfield sites for employment uses would be contrary to the SEA Development scenario which seeks to consolidate brownfield development.</p> <p>Recommendation: Having regard to the assessment detailed in the Environmental Report and Addendum II Report, Material Alteration Ref. Chapter 4-No.3 should be omitted in order to prevent significant residual negative impacts,</p>

<p>Objective (ET3 SLO 1). PMADRAFTDEVPLAN0060, Robert Keran, John Spain Associates PMADRAFTDEVPLAN0072, John Spain & Associates, John Spain & Associates, Peamount Healthcare)</p> <p>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 PMADRAFTDEVPLAN0082, Michael Murphy, Dev. Applications Unit</p>	
Material Alteration Ref. Chapter 4 - No.7	
<p>PMADRAFTDEVPLAN0088, Roger Garland, Keep Ireland Open</p> <p>Submission supports proposed material alterations to ET8 Objective 2 (geological heritage) and its associated Action.</p>	<p>The contents of the submission is noted and acknowledged.</p> <p>Recommendation No change</p>
Material Alteration Ref. Chapter 4 - No.9	
<p>PMADRAFTDEVPLAN0088, Roger Garland, Keep Ireland Open</p> <p>Submission supports proposed material alterations to ET10 Objectives 2 & 3 (mineral extraction).</p>	<p>The contents of the submission is noted and acknowledged.</p> <p>Recommendation No change</p>
Material Alteration Ref. Chapter 6 - No.4	
<p>PMADRAFTDEVPLAN0082, Michael Murphy, Dev. Applications Unit</p> <p>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.</p>	<p>The submission is noted and acknowledged.</p> <p>Recommendation No change</p>
Material Alteration Ref. Chapter 6 - No.7	
<p>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. PMADRAFTDEVPLAN0056, Jamie Moore, Planning Linkage Group - South Dublin County Public Participation Network.)</p> <p>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</p>	<p>The contents of the submissions in relation to the removal of the bridges over the Dodder are noted. As detailed in the Environmental Report and the Addendum Report II, the inclusion of the bridges has the potential to impact significantly on the Dodder Valley landscape and on the river, associated riparian zones and the biodiversity value of the Dodder River habitats.</p> <p>It is noted that the provision of the bridges could enhance public transport accessibility in the areas and surrounding. Improved public transport links can significantly reduce car movements and emissions. However, having regard to the sensitive nature of the Dodder</p>

<p>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. (PMADRAFTDEVPLAN0071, Eoin O'Cofaigh, McHugh O'Cofaigh, Thomas Davis GAA Club PMADRAFTDEVPLAN0097, Eoin Dunphy, McHugh O'Cofaigh, Thomas Davis GAA Club)</p> <p>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 & the NTA cycle network and to enable residential development to the same standard and density as Ellensborough. PMADRAFTDEVPLAN0071, Eoin O'Cofaigh, McHugh O'Cofaigh, Thomas Davis GAA Club PMADRAFTDEVPLAN0097, Eoin Dunphy, McHugh O'Cofaigh, Thomas Davis GAA Club</p> <p>The Department of Arts, Heritage and the Gaeltacht welcomes the removal of two new bridges across the River Dodder. (PMADRAFTDEVPLAN0082, Michael Murphy, Dev. Applications Unit)</p> <p>Submission agrees with the CEO's original report not to remove the 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"> - downgrading of public transport priorities stated in the Draft Plan, - isolation of areas south of the River Dodder from facilities in Tallaght, - increased traffic volumes, traffic congestion and pollution, - increased energy consumption, - cost implications of alternatives, - impact on existing retail and facilities in Tallaght Town Centre due to downgrading of public transport, - loss of amenity of houses fronting Oldbawn Road, - potential impact of the emerging running track proposal on the long-term Firhouse Road/N81 route, and - resultant under-development of future public transport initiatives. <p>(PMADRAFTDEVPLAN0086, Julie Kilroy,</p>	<p>Valley and taking into consideration comments received in the submission on the Draft Development Plan (July 2015) from the Department of Arts, Heritage and the Gaeltacht, it is recommended to support the proposal to remove the bridges from the Draft Plan.</p> <p>Recommendation: That the County Development Plan be made with the proposed Material Alteration to remove the Firhouse-N81 Bridge and the Oldcourt-Oldbawn Bridge from Table 6.6 Medium to Long Term Road.</p>
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Knocklyon Network)	
Material Alteration Ref. Chapter 7 - No.4	Response
<p>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>(PMADRAFTDEVPLAN0031, Olwyn James, Irish Water)</p>	<p>The contents of the submission is noted. It is considered that the wording of the Objective as currently proposed, in conjunction with existing objective IE1 Objective 5 which supports the implementation of the Irish Water project, adequately addresses the future proposals of Irish Water</p> <p>Recommendation: No change</p>
Material Alteration Ref. Chapter 7 - No.5	
<p>Submission from the EPA welcomes intention to cooperate with Dublin City Council and Dun Laoghaire Rathdown County Council in preparing 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.</p> <p>(PMADRAFTDEVPLAN0027, David Galvin, Environmental Protection Agency)</p>	<p>The submission is noted and acknowledged. Provision of a timeframe to carry out this plan is not possible as consultation with the other Local Authorities is required as well as an allocation of resources.</p> <p>Recommendation No change</p>
Material Alteration Ref. Chapter 7 - No.8	
<p>Submission notes that a Specific Local Objective should be applied to lands at Moneenalion Commons, Baldonnel 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.</p> <p>(PMADRAFTDEVPLAN0029, Frances)</p>	<p>As noted in the assessment in the Environmental Report, the SLO requiring a Flood Risk Mitigation Strategy to be carried out with any development proposals on the site does not allow for the cumulative impact of development on the flood zone to be assessed and may result in works being required outside of an applicant's control. Furthermore, the</p>

<p>Fitzgerald TD, Minister , Minister Frances Fitzgerald TD)</p> <p>Submission requests the retention of EE zoning and the SLO in the Draft Plan. (PMADRAFTDEVPLAN0073, John Spain & Associates, John Spain & Associates, MLEU Dublin Ltd))</p>	<p>requirement for heavy engineering works to be carried out as mitigation measures would have a negative impact on biodiversity, rivers, groundwater, landscape and on the overall County GI network.</p> <p>As noted in the assessment in the Environmental Report, the retention of an Employment zoning on these lands would have significant negative environmental impacts on biodiversity, landscape, rivers and transport. Rezoning the lands for development purposes has been assessed as having a most detrimental effect on the receiving environment and the Development Strategy of the Draft County Development Plan. Furthermore it was noted that the SLO requiring a Flood Risk Mitigation Strategy to be carried out with any development proposals on the site does not allow for the cumulative impact of development on the flood zone to be assessed and may result in works being required outside of an applicant's control. Furthermore, the requirement for heavy engineering works to be carried out as mitigation measures would have a negative impact on biodiversity, rivers, groundwater, and landscape and on the overall County GI network.</p> <p>Recommendation Retain the lands zoned for "RU" in the Draft Development Plan and omit the proposed SLO.</p>
<p>Material Alteration Ref. Chapter 8 - No.2</p> <p>Submission supports Action listed under Section 8.0 (Green Infrastructure Strategy). (PMADRAFTDEVPLAN0088, Roger Garland, Keep Ireland Open)</p>	<p>The submission is noted and acknowledged.</p> <p>Recommendation No change</p>
<p>Material Alteration Ref. Chapter 8 - No.4</p> <p>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. (PMADRAFTDEVPLAN0050, Aoife Byrne, SLR Consulting Ireland Limited)</p> <p>The Department of Arts, Heritage and the Gaeltacht welcomes the inclusion of G2 Objective 13 in relation to invasive species. (PMADRAFTDEVPLAN0082, Michael Murphy, Dev. Applications Unit)</p>	<p>Submissions proposal to change text within the material alteration from 'prevent the loss' to 'avoid the loss' is noted. The MA as proposed is considered acceptable in terms of restricting spread of invasive species</p> <p>Recommendation No change</p> <p>The submission is noted and acknowledged.</p> <p>Recommendation No change</p>
<p>Material Alteration Ref. Chapter 9 - No.8</p> <p>In relation to the commitment given under Section 9.2.0 Landscapes HCL 10 SLO1,</p>	<p>The submission is noted and acknowledged. As noted in the Environmental Report assessment,</p>

<p>(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. (PMADRAFTDEVPLAN0027, David Galvin, Environmental Protection Agency)</p>	<p>any development on these lands should respect the character of the local landscape and site features.</p> <p>Recommendation Amend SLO to include provision for environment management plan</p>
<p>Material Alteration Ref. Chapter 10 - No.2</p>	
<p>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 policy as adopted by Dun Laoghaire Rathdown. (PMADRAFTDEVPLAN0052, Jeff Colley, Temple Media Ltd (trading as Passive House Plus))</p> <p>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. Submission includes information used to calculate educational infrastructural requirements (Appendix 1), Site Suitability specifications (Appendix 2), and Department's 2016-2021 construction programme projects. PMADRAFTDEVPLAN0089, Anne Flynn, Department of Education & Skills</p>	<p>The contents of the submission are acknowledged and noted.</p> <p>Recommendation No change</p> <p>Noted. The assessment contained within Addendum II to the Environmental Report notes that proposals for renewable energy resources would reduce energy consumption and contribute positively towards slowing the effects of climate change.</p> <p>Recommendation No change</p>
<p>Material Alteration Ref. Chapter 10 - No.4</p>	
<p>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.</p>	<p>The contents of the submission is noted and acknowledged.</p> <p>Recommendation No change</p>

PMADRAFTDEVPLAN0082, Michael Murphy, Dev. Applications Unit	
Material Alteration Ref. Chapter 10 - No.8	Response
<p>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 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. (PMADRAFTDEVPLAN0011, Lara Gough, EirGrid)</p> <p>Submission supports the addition of E11 Objective 1 in the Draft Plan. (PMADRAFTDEVPLAN0029, Frances Fitzgerald TD, Minister , Minister Frances Fitzgerald TD)</p> <p>Submission supports proposed material alterations to E11 Objective 1 (undergrounding power lines). (PMADRAFTDEVPLAN0088, Roger Garland, Keep Ireland Open)</p>	<p>As noted in the Environmental Report (May 2016) and Addendum II report, the placing of infrastructure underground would have positive visual impact on the landscape character of the County. It is considered that the suggested rewording detailed in the submission is reasonable and would not undermine the intention of the Objective.</p> <p>Recommendation Amend wording of E11 Objective 1 to explore and support undergrounding of proposed infrastructure.</p> <p>The contents of the submission is noted and acknowledged.</p> <p>Recommendation No change</p> <p>The contents of the submission is noted and acknowledged.</p> <p>Recommendation No change</p>
Material Alteration Ref Chapter 11 - Zoning Tables - No. 1	
<p>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. (PMADRAFTDEVPLAN0027, David Galvin, Environmental Protection Agency)</p>	<p>The contents of the submission is noted and acknowledged. As noted in the Environmental Report Addendum II, mitigation measures have already been incorporated into the Draft Plan to contribute towards environmental protection and sustainable development. These measures include Policy G2 Objective 3 (Green Infrastructure), Policy HCL 12 Objectives 1 and 2 (Natura 2000 sites), Policy HCL 13 Objectives 1 and 2 (NHAs) and Policy HCL7 Objectives 1 and 2 (Landscapes). Furthermore, there are criteria outlined in Chapter 11 Implementation that addresses issues that must be implemented</p>

	at Development Management stage.
	Recommendation No change
Material Alteration Ref. Chapter 11 - No.2	
<p>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. 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. (PMADRAFTDEVPLAN0090, Ciara Gilgunn, Department of Environment, Community and</p>	<p>The contents of the submission are noted. See the main body of the CE report for comment.</p>

Local Government)	
Material Alteration Ref. Chapter 11 - No.6	Response
<p>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.</p> <p>PMADRAFTDEVPLAN0050, Aoife Byrne, SLR Consulting Ireland Limited</p> <p>Submission supports proposed material alterations to Section 11.3.8 (Extractive Industries).</p> <p>PMADRAFTDEVPLAN0088, Roger Garland, Keep Ireland Open</p>	<p>The contents of the submission are noted. Reference to the Code of Practice would serve to support the protection and conservation of architectural heritage.</p> <p>Recommendation: Amend text in Section 11.3.8 of the Draft Plan to refer to Code of Practice (2009)</p> <p>The contents of the submission are noted.</p>
MA.M13	
<p>Submission requests that lands at Moneenallon Commons, Baldonnel retain an 'EE' zoning.</p> <p>(PMADRAFTDEVPLAN0029, Frances Fitzgerald TD, Minister , Minister Frances Fitzgerald TD)</p>	<p>As noted in the assessment in the Environmental Report, the retention of an Employment zoning on these lands would have significant negative environmental impacts on biodiversity, landscape, rivers and transport. Rezoning the lands for development purposes has been assessed as having a most detrimental effect on the receiving environment and the Development Strategy of the Draft County Development Plan.</p> <p>Recommendation Retain the lands zoned for "RU" in the Draft Development Plan</p>
MA.C7-08	
<p>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"> - Very significant investment in these lands has taken place as well as advanced detailed plans for a substantial employment generating development -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. -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 	<p>As noted in the assessment in the Environmental Report, the retention of an Employment zoning on these lands would have significant negative environmental impacts on biodiversity, landscape, rivers and transport. Rezoning the lands for development purposes has been assessed as having a most detrimental effect on the receiving environment and the Development Strategy of the Draft County Development Plan.</p> <p>Recommendation Retain the lands zoned for "RU" in the Draft Development Plan</p>

not subject to flood risk on the grounds of flood risk concerns.

-Submission outlines that only 32% of the subject lands are located in Flood Zone A.

-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 balance between avoiding flood risk and facilitating necessary development..

-Submission outlines the economic benefit of the zoning and extracts of the Regional Planning Guidelines.

-Site is fully serviced (submission outlines the details in an Appendix)

-The development of such lands will play an important role in the economy and reinforce the national importance of the GDA

-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.

- 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:

(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.

(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.

(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 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.

(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.

(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.

(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.

(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.

(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.

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.

In the logistics development proposed, the extent of Flood Zone A is 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. Submission outlines that the response to motions on this issue is not evidenced based. Submission includes a submitted Development Plan Justification Test that concludes that the proposed EE employment zoning is appropriate. ([PMADRAFTDEVPLAN0073, John Spain & Associates, John Spain & Associates, MLEU Dublin Ltd](#))

OTHER – Issue(s) Not Related to Material Alterations

Submission	Response
<p>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. (PMADRAFTDEVPLAN0027, David Galvin, Environmental Protection Agency)</p> <p>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). (PMADRAFTDEVPLAN0090, Ciara Gilgunn, Department of Environment, Community and Local Government)</p>	<p>The contents of the submission are noted. There are a number of policies proposed within the Draft Plan that support the development of a Green Infrastructure Network and have regard to environmental sensitivities within an area. For example, Policy G1 (Green Infrastructure), Policy HCL7 (Landscapes) and HCL Policy 12 (Natura 2000 sites) and HCL Policy 13 (Natural Heritage Areas).</p> <p>The contents of the submission are noted</p>