



A vibrant community offering a new way of living





Clonburris Strategic Development Zone Draft Planning Scheme

Chief Executive's Report on Submissions Received

December 2017



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0.1 Introduction

0.1.1 Purpose of the Report

As the specified Development Agency, South Dublin County Council has prepared a Draft Planning Scheme for the Clonburris Strategic Development Zone (SDZ). The Draft Planning Scheme consists of a written statement and plans indicating the type and extent of development to be permitted in the SDZ, together with proposals relating to the design of development, transportation, the provision of services, the minimisation of any adverse impacts on the environment and the provision of amenities, facilities and services for the community. It is accompanied by a Strategic Environmental Assessment (SEA) Environmental Report and an Appropriate Assessment Stage One Screening Report.

The Council undertook statutory Draft Planning Scheme public consultation from Friday 22nd September 2017 to Friday 3rd November 2017. A total of 606 valid submissions were received.

This Chief Executive's Report summarises and details the outcome of the public consultation programme on the Draft Planning Scheme and contains the following:

- lists the persons or bodies who made submissions or observations on the Draft Planning Scheme;
- summarises the issues raised by the persons or bodies in the submissions or observations; and
- gives the response of the Chief Executive to the issues raised, taking account of the
 proper planning and sustainable development of the area, the statutory obligations
 of any local authority in the area and any relevant policies or objectives for the time
 being of the Government or of any Minister of the Government, or any Minister of
 the Environment.

This Chief Executive's Report on the Draft Planning Scheme Public Consultation is hereby submitted to the members of South Dublin County Council for consideration.

0.1.2 Background

On 15th December 2015, the Government ordered the designation of approximately 280 hectares of land at Clonburris, as a site for the establishment of a Strategic Development Zone (SDZ). Order 2015 (S.I. No. 604 of 2015) established and extended the designated area for Balgaddy-Clonburris SDZ. The Draft Planning Scheme shall be prepared not later than two years after the making of the Order. Under the Designation of Strategic Development Zone: Balgaddy – Clonburris, South Dublin County Order 2015, the lands which are deemed to be of economic and social importance to the state, are:

"designated as a site for the establishment of a strategic development zone in accordance with the provisions of Part IX of the Act for residential development and the provision of schools and other educational facilities, commercial activities, including employment office,





hotel, leisure and retail facilities, rail infrastructure, emergency services and the provision of community facilities as referred to in Part III of the First Schedule to the Act, including health and childcare services."

The Planning Scheme is the land use document that sets out the detailed framework for development on the lands, including the type and extent of development permissible, proposals relating to transport, services, amenities and facilities required to support the new development. The Planning Scheme is made by the relevant Planning Authority and if subsequently appealed, determined by An Bord Pleanála.

At a strategic level the development of these lands will deliver housing to meet growth targets in both the Dublin Metropolitan area and South Dublin County. The purpose of an SDZ Planning Scheme is to ensure the delivery of residential and non-residential development together with supporting infrastructure and facilities in a sustainable manner on a strategic site – a sustainable community rather than solely a housing or commercial development.

0.1.3 Public Consultation

Section 169 of the Planning and Development Act 2000 (as amended) sets out the requirements to carry out public consultation in respect of a Draft Planning Scheme, legislation does not preclude a Development Agency from taking whatever steps it considers necessary to consult with the public and other stakeholders. Public consultation on the Draft Planning Scheme took place over a six week period from Friday 22nd September to Friday 3rd November 2017. Information was disseminated to the public and submissions were invited, with 606 valid submissions received in total.

In addition in accordance with Article 179 A of the Planning and Development (Strategic Environmental Assessment) Regulations 2004 and Habitats Directive 92/43/EEC, the Strategic Environmental Assessment (SEA) Environmental Report and an Appropriate Assessment Stage One Screening Report were also on public display.





0.2 Details of the Public Consultation Process

0.2.1 Objectives of the Public Consultation Process

The objectives of the Clonburris SDZ public consultation process were as follows:

- Increase awareness of the Draft Planning Scheme for the general public, various stakeholders, prescribed bodies, and SDCC staff;
- Provide opportunities for more creative and dynamic engagement with a variety of interested parties, including younger citizens, hard to reach stakeholders and locally based community and residents groups;
- Increase the number, variety and quality of submission received, appropriate to the Draft Planning Scheme stage;
- Encourage longer term engagement strategies beyond the Draft Planning Scheme stage and scope follow up activities; and
- To align with South Dublin County Council External Communications Strategy objectives.

0.2.2 Outline of Public Consultation Process

Section 169 of the Planning and Development Act 2000 (as amended) sets out that a Planning Authority must publish notice of the preparation of a Draft Planning Scheme in one or more newspapers circulating in its area and that a copy of the Draft Planning Scheme may be inspected at a stated place or places, at stated times during a stated period. These are the statutory obligations with regard to public consultation for a Draft Planning Scheme. South Dublin County Council has exceeded its statutory obligations with regard to public consultation for the Clonburris SDZ Draft Planning Scheme, and has used a variety of online and supporting 'face to face' methods, to consult and engage with citizens of South Dublin County and a range of other stakeholders and interested parties.

The Draft Planning Scheme public consultation process involved the following key elements:

- Official Launch event on Friday 22nd September 2017, including launch of dedicated website www.clonburris.ie and the <a href="Clonburris Public Consultation Video. Over the six week public consultation period, there were over 23,000 website visits and the video has been viewed over 32,000 times. Images of the dedicated website and public consultation video are available in Appendix B, web links are included above;
- A Press Release and accompanying photographs were issued to local and national press following the official launch event on Friday 22nd September;
- A Newspaper Notice appeared in the Irish Times on Friday 22nd September 2017 and the Echo and Gazette on Thursday 28th September 2017. A copy of the Newspaper Notice is contained in Appendix C;
- Over 30,000 leaflets were distributed to homes and businesses in the Lucan, Clondalkin, Adamstown and Liffey Valleys areas, a copy of the leaflet is contained in Appendix D;



- A targeted Social Media campaign including Facebook and Twitter was carried out over the six week public consultation period, the Facebook campaign had a profile reach of over 84,600;
- A Landowner Briefing took place on Friday 22nd September 2017;
- Briefings for Elected Members took place on Thursday 21st September and Wednesday 25th October 2017;
- Public consultation displays were available at County Hall, Tallaght, Clondalkin Civic Offices, Lucan Library, Clondalkin Library and Tallaght Library throughout the six week period.
- Four Public Information Sessions took place at Lucan Library, Clondalkin Library, Clondalkin Civic Offices and Tallaght Library in October 2017;
- A briefing took place with the South Dublin County Disability Advisory and Consultative Panel on Monday 19th October 2017;
- Class based exercises took place with sixth class pupils of Lucan East Educate Together Primary School on Tuesday 24th October 2017;
- A briefing took place for the South Dublin Public Participation Network (PPN) on Wednesday 11th October 2017.
- A briefing for TDs and Oireachtas members took place on Thursday 19th October 2017;
- Letters issued to the Minister of Housing, Planning & Local Government, An Bord Pleanala and Prescribed Authorities. This information included an invitation for submissions/observations up to Friday 3rd November 2017.
- The Clonburris SDZ Team were available at the Planning Counter at SDCC offices in Tallaght every Wednesday between 2pm and 4pm during the public consultation period.

0.2.3 How did you hear about the Public Consultation?

Consultees entering their submissions through the Council's dedicated <u>Public Consultation</u> <u>Portal</u> were invited to indicate how they heard about the public consultation. The aim of this question was to gain a greater insight into the methods of communication and information dissemination open to the Council, in engaging with the general public and other stakeholders. The breakdown of responses is shown in Figure 0.2.1.





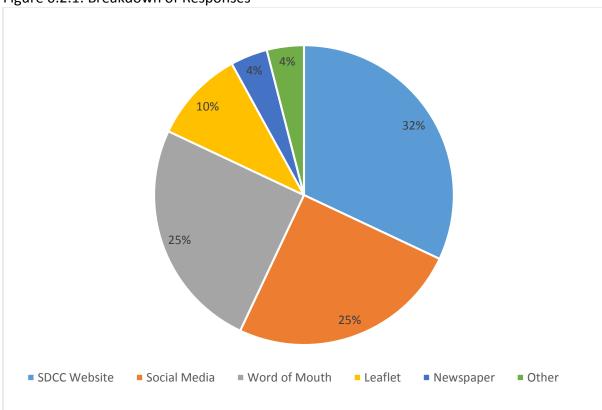


Figure 0.2.1: Breakdown of Responses

0.2.4 Public Information Sessions

Four evening Public Information Sessions were undertaken, with members of the SDZ Team in attendance to answer the public's queries, during the public consultation period as follows:

Venue	Date	Time
Civic Offices Clondalkin	Tuesday 3 rd October	4pm to 7pm
Clondalkin Library	Thursday 5 th October	4pm to 7pm
Lucan Library	Monday 9 th October	4pm to 7pm
Tallaght Library	Thursday 12 th October	4pm to 7pm

The Clonburris website was displayed throughout the sessions, together with copies of the Draft Planning Scheme, accompanying documents and the SDZ Masterplan.

Over 40 persons attended the Public Information Sessions over the four evenings. Attendees were either participating as individuals or on behalf of a local group i.e. residents association, sports club or other organisations. The majority of attendees lived locally, with some living further afield within South Dublin County and County Kildare. A wide range of topics and issues were raised during these Public Information Sessions.

The main issues raised relating to the Draft Planning scheme included the following:

Clonburris



- Canal extension development to the rear of Ashwood Estate including density, building height, and access road;
- Social housing provision including location and quantum of units;
- Traffic congestion including existing traffic congestion and the impact of additional traffic on the existing road network;
- Road infrastructure including the lack of new roads and upgrades to existing roads;
- Transport Assessment;
- Public transport provision including the opening of Kishoge rail station;
- Building heights including those adjacent to existing residential areas;
- Built Form and design- including overshadowing and loss of privacy;
- Land ownership;
- Community Facilities including health and wellbeing facilities;
- Adamstown SDZ; and
- Anti-social behaviour.

0.2.5 Engagement with Children

The Clonburris SDZ team attended class based information sessions with 6th Class (approximately sixty pupils and three teachers) at Lucan East Educate Together Primary School. The school is located within the SDZ boundary and the majority of the pupils live in the Lucan and Adamstown areas.

The aim of the sessions was to have meaningful engagement with school going children from the locality. During the sessions, the pupils were introduced to urban planning and to the overarching themes of the Clonburris SDZ Draft Planning Scheme. The pupils were also shown the Clonburris public consultation video to give them some context and this was followed by a class based discussion.

The main topics of the Draft Planning Scheme were discussed with the pupils and they were given the opportunity to ask questions. It was noted that approximately half of the pupils walk and cycle to school and the rest of the pupils travel by car. The reasons for not walking and cycling related to convenience and distance.

It was also noted that the majority of pupils intend attending the local Kishoge Community College, which is also located on the SDZ lands, for secondary school education. The pupils asked a number of questions in relation to house sizes, building heights, mix of housing types, wildlife, flooding, traffic congestion, Adamstown SDZ build out, playing pitches and schools.

0.2.6 Landowners Briefing

SDCC hosted a briefing with landowners in the offices of SDCC on Friday 22nd September 2017. At the briefing a presentation was given setting out the main contents of the Draft Planning Scheme and the details of the public consultation strategy. The landowner representatives were invited to ask questions and make initial comments on the Draft Planning Scheme.





0.3 Details of the Submissions

0.3.1 Introduction

A total of 606 valid submissions were received, the breakdown of submissions is as follows:

Table 0.3.1: Overview of Submissions

Online Portal Submissions Posted / Handed Submissions	395 211
Total Submissions	606

All submissions were read, analysed and summarised. A list of the persons, organisations and bodies that made submissions is provided in Appendix A, an overview of issues raised is provided on Section 0.3.3. The categorisations and summary of issues raised, together with the Chief Executive's response and recommendations is contained in Section 1.0 onwards.

NB: The headings relating to the categorisation and summary of issues raised, together with the Chief Executive's response and recommendations, follows that of the headings of the Draft Planning Scheme document i.e. Section 1.1 Introduction, Section 1.2 The Strategic Development Zone Vision and so forth.

0.3.2 List of Persons, Organisations and Bodies who made Submissions

Appendix A lists the persons, organisations and bodies that made written submissions. Each submission has been assigned an independent reference, which can be cross referenced against the issues set out in the following sections.

0.3.3 Summary of Issues Raised in Submissions

All 606 valid submissions received by the Council were read and analysed. A total of 1,103 issues were identified and summarised. An analysis of the submissions has been carried out and the topics and issues raised have been extracted and categorised according to the Chapter and Section heading in the Draft Planning Scheme document. Each of the category headings together with the number of times that issues were raised in relation to each section is detailed below. A submission may raise multi issues and they are separated and appear as separate entries in the appropriate category.





Table 0.3.2: Breakdown of Issues for all Categories

Category	Issues Raised	% of Total
Chapter 1.0 Introduction and Vision	71	6.44%
Section 2.1 Land Use and Density	73	6.62%
Section 2.2 Movement and Transport	233	20.49%
Section 2.3 Green and Blue Infrastructure	5	0.45%
Section 2.4 Urban Centres	8	0.73%
Section 2.5 Retail	23	2.09%
Section 2.6 Economic Development	14	1.27%
Section 2.7 Community Facilities	95	8.61%
Section 2.8 Built Form and Design	29	2.63%
Section 2.9 Services, Infrastructure and Energy Framework	46	4.17%
Section 2.10 Landscape and Open Space	25	2.27%
Section 2.11 Biodiversity and Natural Heritage	29	2.63%
Section 2.12 Archaeological and Architectural Heritage	8	0.73%
Chapter 3.0 Character Areas and Development Areas	211	19.13%
Chapter 4.0 Phasing	81	7.34%
Strategic Environmental Assessment (SEA) Environmental Report	1	0.09%
Appropriate Assessment Screening Report	1	0.09%
Accompanying Documents	25	2.27%
Outside Scope of Planning Scheme or SDZ Lands	125	11.33%
Total Issues Raised	1,103	100%

In terms of the issues that were raised most frequently, the highest number (233 times/21% of issues raised) related to Section 2.2 Movement and Transport.

The second highest proportion of issues raised (211 times/19.13%) related to Chapter 3.0 Character Areas and Development Areas. Other issues that featured prominently related to Section 2.7 Community Facilities, Section 4.0 Phasing, Chapter 1.0 Introduction and Vision and Section 2.1 Land Use and Density.





The Chief Executive has prepared a response and recommendation under the relevant Section of the Draft Planning Scheme. The format of the Categorisation, Summary and Responses to Issues Raised section of the report outlines the summary of issues with the Chief Executive's response and recommendation below.

0.4.1 Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA)

A Strategic Environmental Assessment (SEA) Environmental Report and an Appropriate Assessment Stage One Screening Report accompanied the public display of the Draft Planning Scheme. This Chief Executive's report on submissions received includes a summary and consideration of all submissions on these documents and/or the process of SEA/AA. In addition, any amendments proposed arising from the Chief Executive's recommendations have been screened and assessed for the purposes of SEA and AA.

The Elected Members shall have regard to the Strategic Environmental Assessment (SEA) Environmental Report and any submissions made during the Planning Authority's consideration of the Draft Planning Scheme and before its adoption. This is in accordance with the Planning and Development (Strategic Environmental Assessment) Regulations 2004.

0.4.2 Structure of the Report

Amendments to the text of the Draft Planning Scheme are identified by their location in the Draft Planning Scheme – i.e. Section 1.6. Policy Context

Additions to the text are identified through the use of green print, for example:

2.6.3 Employment Floorspace

Commercial uses such as hotels, hostels, bed and breakfast, funeral homes, public houses, nursing homes, garden centres, conference centres and healthcare facilities etc. are generally permitted in principle in the Urban Centres and will form part of meeting the minimum employment floorspace in the Draft Planning Scheme. Other uses will be considered on a case by case basis having regard to the projected employment, employment per sq. metre, the nature of the use and compliance with the Planning Scheme.

Deletions to the text are shown in red print with strikethrough, for example:

b). Section 2.2.3

This Planning Scheme also seeks to ensure that all residential development will also be afforded direct or indirect access to dedicated pedestrian and cyclist routes to schools and local facilities especially parks, open spaces, public transport, retail and non-retail services.







0.5 Next Steps

This Chief Executive's Report on the Draft Planning Scheme Public Consultation is hereby submitted to the members of South Dublin County Council for consideration. Special Meetings of South Dublin County Council will take place in January 2018 to consider the Chief Executive's Report.

The Planning and Development Act 2000 (as amended) outlines that the elected members of SDCC have 6 weeks to consider the Chief Executive Report and the Draft Planning Scheme. The following decision options available to the members, as set out in legislation are summarised as follows:

i. Default

Draft Planning Scheme is deemed to be made after 6 weeks if the elected members of SDCC do not pass a resolution to make or not make the draft planning scheme.

ii. Make – No Material Alteration

Resolution to make the draft planning scheme, subject to variations and modifications which do not constitute a material alteration.

iii. Make – Subject to Material Alteration

Resolution to make the draft planning scheme, subject to variations and modifications which constitute a material alteration*.

iv. Not Make

Resolution not to make the draft planning scheme.

*The Planning Authority shall determine if the variations and modifications to the Draft Planning Scheme are material alterations. Material alterations will result in an additional public consultation stage and consideration of AA and SEA implications.

0.5.1 Appeal Process

An appeal to An Bord Pleanála can be lodged on the decision of the Planning Authority within 4 weeks of the date of the decision. The Planning and Development Act 2000 (as amended) outlines that the following parties can appeal:

- a) Development Agency; and
- b) Any person who made a submission or observation to the Draft Planning Scheme.









0.6 Categorisation, Summary and Responses to Issues Raised

1.0 Introduction and Vision for Clonburris

1.1 Introduction

- 1. Submission welcomes the SDZ plan and outlines there is great potential in this plan to create vibrant and healthy communities. (<u>DraftClonSDZ0498</u>, <u>Cllr Breeda Bonner</u>)
- Clear Real Estate Investments PLC are supportive of the preparation by South Dublin County Council of the Draft Planning Scheme for the Clonburris area of Dublin as it will assist in the delivery of much needed additional residential accommodation, whilst at the same time generating significant job opportunities both during the construction phase and in to the long term through the additional commercial developments proposed (<u>DraftClonSDZ0329</u>, <u>Stephen Little</u>, <u>Clear Real Estate Investments PLC</u>)
- 3. It is important to provide a safe, clean, well-maintained, properly serviced area with adequate public transport links in order to allow a sustainable community to develop. (DraftClonSDZ0505, Paula Kelly)
- 4. Concerns raised that the development of Clonburris will be a GETTO by moving loads of families in with no facilities, no Garda, & not thinking it through. This is what happened in places like Tallaght in the 70s & 80s, private estates were surrounded by social/council/corporation housing, no thought put into it, no facilities, and this lead to many social problems. (DraftClonSDZ0007, Jennifer Byrne)
- 5. Submission outlines that too many houses are proposed to be built with no park or public transport considered. (<u>DraftClonSDZ0042</u>, <u>Joanne Flynn</u>)
- 6. Submission objects to scale of overall plan. (DraftClonSDZ0243, Elizabeth Nolan)
- 7. Submission from Lucan resident states 'poor planning' under introduction heading (DraftClonSDZ0366, David Quinn)
- 8. Objects to the amount of houses proposed and the impact this will have on an already saturated area. (<u>DraftClonSDZ0395</u>, <u>Gema Pintor</u>)
- 9. Concern is raised that the proposed development will only serve to impact negatively on the existing residents of the area. (<u>DraftClonSDZ0221</u>, <u>Elaine Hurley</u>)
- 10. Objection to the size and scale of the Clonburris SDZ in this location however the objection does not relate to the building of houses. (DraftClonSDZ0492, Jim Milton)
- 11. Queries what is proposed to facilitate the social integration of Clonburris with the surrounding area. (<u>DraftClonSDZ0507</u>, <u>Caitriona McClean</u>)
- 12. There is a sense that Clonburris is being developed as an island community with no places for shared services with surrounding areas apart from two existing schools. Query whether a sociological impact assessment has been carried out. (DraftClonSDZ0507, Caitriona McClean)
- The scheme deals with Clonburris in isolation rather than looking at the reality on the ground, which is two SDZs being constructed side by side. (<u>DraftClonSDZ0537</u>, <u>John Vaughan</u> <u>DraftClonSDZ0536</u>, <u>Michael Jennings</u> <u>DraftClonSDZ0531</u>, <u>Adrienne O'Driscoll</u> <u>DraftClonSDZ0532</u>, <u>Ciaran O'Driscoll</u> <u>DraftClonSDZ0530</u>, <u>Kay Vaughan</u> <u>DraftClonSDZ0533</u>, <u>Marie Tweedy</u> <u>DraftClonSDZ0534</u>, <u>Shay Keogh</u>)
- 14. This 8000+ housing plan is a potentially disastrous idea, socially, economically (damage already struggling houses prices) and environmentally. (DraftClonSDZ0010, Conor McGuinness)
- 15. The submission states that they fully oppose the building of the proposed Clonburris SDZ. (DraftClonSDZ0593, Therese Brien)



The Draft Planning Scheme for the Clonburris SDZ has been prepared as a direct result of Government legislation (S.I. No. 604 of 2015). The SDZ Order identifies the lands at Clonburris, consisting of 280 hectares, as a site for the establishment of an SDZ and deems the lands to be of economic and social importance to the State. The Government's position on the Clonburris SDZ is reinforced by the classification of the SDZ lands as a Major Urban Housing Development Site (MUHDS), and also the allocation of funding in 2017, to the SDZ lands under the Local Infrastructure Housing Activation Fund (LIHAF).

Having regard to the Government Order, the previous adopted Planning Scheme and Local Area Plan on the lands, the intervening economic, social and environmental context, and the overarching and strategic outlook for the growth of South Dublin County, the Council has responded by preparing a Draft Planning Scheme that takes account of these factors and offers a comprehensive evidence based approach to the formulation of an integrated spatial planning masterplan. The Draft Planning Scheme provides for a residential target of 8,437 new homes together with a range of community and other non-residential floorspace, to be delivered on a phased basis, as is the delivery mechanism essential to an SDZ Planning Scheme. The Draft Planning Scheme also offers a range of movement options and integrated public transport, green and blue infrastructure, services, infrastructure and energy proposals, parks and open spaces, heritage and biodiversity measures, all to be delivered as part of a rationalised phasing and implementation approach.

In further considerations of submissions made, it is considered that the Draft Planning Scheme prepared for this site, which is at the heart of South Dublin County, has been undertaken in a way that articulates and enlivens the development potential of the lands, looks beyond the boundary of the SDZ, seeks to achieve integration with the adjoining communities of Adamstown, Lucan and Clondalkin, and contribute to the development and future growth of the wider South Dublin County beyond. This approach has also provided for the integration of key existing assets on and adjoining the site, in particular the Grand Canal, Griffeen Valley Park and the Kildare rail line. As such, it is considered that the Draft Planning Scheme represents a comprehensive shared outlook and a collaborative blueprint to unlock the economic, social and environmental development of the SDZ lands.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.

1.2 The Strategic Development Zone Vision

- Publication of the draft Planning Scheme is welcomed and submitter fully supports this
 opportunity to create a sustainable new community. (<u>DraftClonSDZ0343, Everglade</u>
 <u>Properties Limited (In Receivership) Everglade Properties Limited (In Receivership),</u>
 <u>Everglade Properties Limited (In Receivership)</u>)
- 2. Submission from Lucan resident and Principal of Adamstown Castle ETNS agrees that there is a need for higher density, town like centres of population where all services are local and easily accessible and suggests that any pressure to amend the Planning Scheme be reviewed in the context of its original vision. (DraftClonSDZ0313, Tom Moriarty)
- 3. The vision needs to be broadened to take account of existing communities. (DraftClonSDZ0332, Paul Gogarty)
- 4. The Clonburris development should not go ahead as it will affect existing residents in the Lucan area. (DraftClonSDZ0327, Janvi Shah)





- 5. Sinn Fein submission states that the SDZ must be designed to meet the needs of the existing and future communities in the Dublin Mid-West constituency. The SDZ must get the balance right between housing, amenities, employment and infrastructure. The SDZ must ensure that amenities, employment and infrastructure are developed alongside residential development according to strict and defined phasing commitments. (DraftClonSDZ0383, Eoin Ó Broin TD, Cllr Danny O'Brien & Cllr Mark Ward)
- The SDZ lands are located in an already highly populated area, unimaginable level of traffic congestion, without adequate infrastructure and transport solutions. (<u>DraftClonSDZ0386</u>, <u>Kinga Drozdz</u>)

The Clonburris SDZ Vision it to create 'a vibrant community offering a new way of living' by focusing on the themes of Place, Choice and Growth. The SDZ Vision aims to create a new sustainable community or 'place' between the established communities of Adamstown, Lucan and Clondalkin, offering a range of 'choice' with regard to residential and non-residential development, supporting facilities and movement and accessibility options, whilst contributing to the overall 'growth' of South Dublin County, thereby strengthening its position within the Dublin Region.

Having regard to submissions made and the need to take account of the existing communities and the impact of the SDZ on the adjoining and surrounding areas, the Draft Planning Scheme has been designed to be an exemplar in sustainable community development, to appropriately connect Clonburris to surrounding neighbourhoods and villages, including the sensitive and co-ordinated integration of the existing assets and unique selling points offered by, and adjoining, the SDZ lands. This approach serves to achieve the overall vision of the Draft Planning Scheme by maximising the scale and potential of the SDZ, coupled with the Government led support for the strategic development of the SDZ lands.

Furthermore, in preparing the Draft Planning Scheme, the Council undertook a comprehensive evidence based approach, including the preparation of a range of supporting documents including a Transport Assessment and Transport Strategy, Strategic Flood Risk Assessment, Surface Water Strategy, Retail Study, Employment Floor Area Demand Study, Energy Masterplan, and Archaeological and Architectural Heritage Inventory.

Having regard to the need for a balanced approach to the development of Clonburris, the Draft Planning Scheme also offers a range of residential and non-residential development, movement options and integrated public transport, green and blue infrastructure, services, infrastructure and energy proposals, parks and open spaces, heritage and biodiversity measures, all to be delivered as part of a rationalised phasing and implementation approach.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.

1.3 Overarching Principles of the Planning Scheme

 The Council is commended for the significant research and preparatory work undertaken on transport, employment and energy issues in conjunction with the Draft Planning Scheme which is evident in the supporting documentation published to accompany the scheme. (<u>DraftClonSDZ0268</u>, <u>Maude Ni Bhrolchain</u>, <u>Department of Housing</u>, <u>Planning and Local</u> <u>Government</u>)





- Submission welcomes the content of the scheme and commends the Development Agency
 for the preparation of a very well-considered Draft Scheme with an urban structure that will
 secure a quality residential environment and deliver sustainable residential communities.
 (DraftClonSDZ0350, Deirdre O'Connor National Asset Management Agency, NAMA)
- 3. The draft plans, prepared by Council staff, contain many laudable and welcome elements and are to be applauded. (<u>DraftClonSDZ0399</u>, <u>Guss O'Connell</u>)
- 4. Submission not objecting to development of new housing but the impact of the existing communities should be considered. (DraftClonSDZ0001, Richard Dillon)
- 5. Homes were originally bought in the area due to safety, privacy, security and transport options, which were all positives in choosing to buy in the area. The SDZ plans will take away all these positives. (DraftClonSDZ0030, Gary Jones)
- 6. Submission on behalf of residents association advises that the proposed Planning Scheme is cautiously supported. General concerns are highlighted in relation to Garda Stations, Fire Stations, Third Level Education, Opening of Train Station and the level of train services. Positives highlighted in comparison to the 2008 SDZ scheme include less residential development, more open green space, reduction in building heights, the provision of an additional urban centre and promotion of an alternative travel culture. (<u>DraftClonSDZ0242</u>, <u>Deirdre Nolan</u>, <u>Cappaghmore Residents Group</u>)
- Submission on behalf of Clondalkin community group lists issues in relation social housing, traveller accommodation, sustainability, urban centres, and consultation. Positives are listed in relation to less residential development, more green spaces, two urban centres, opportunity for alternative transport and reduction in building heights. (<u>DraftClonSDZ0246</u>, George Graham, Westbourne Community Group)
- 8. The Draft Planning Scheme sets out in clear and appropriate detail the proposed format of development and the overall delivery of an integrated new community as part of the City. (DraftClonSDZ0268, Maude Ni Bhrolchain, Department of Housing, Planning and Local Government)
- 9. The Draft Planning Scheme for Clonburris is considered by the Department to provide a comprehensive framework for the proper planning and sustainable development of this strategically important housing area and, in particular, for the planned future growth of new housing development in tandem with the necessary supporting community, educational, employment and physical infrastructure. (DraftClonSDZ0268, Maude Ni Bhrolchain, Department of Housing, Planning and Local Government)
- 10. Submission lodging objection against this full plan (submission refers to a cover letter but none submitted) (<u>DraftClonSDZ0273</u>, <u>Darren Nolan</u>)
- 11. The introduction of such a large volume of people will have a negative impact on the area by way of anti-social behaviour. (<u>DraftClonSDZ0301, Claire Mescall</u>)
- 12. Submission on behalf of landowner (Cairn Homes PLC) generally welcomes amended residential density, reduced retail/town centre allocation, revised infrastructure requirements and flexible phasing provisions. (DraftClonSDZ0351, Cairn Homes Plc, Cairn Homes)
- Submission from Adamstown resident highlights concerns in relation to over population, traffic congestion, absence of detail, absence of solutions and overcrowding of public transport. (<u>DraftClonSDZ0357</u>, <u>Meena BASKARASUBRAMANIAN</u>)
- 14. Submission from Clondalkin resident highlights that the lands were originally designated to create a town centre for Lucan and Clondalkin and raises queries in relation the current proposals for housing on a greenfield site in relation to impact on current residents, services, lessons from Adamstown, character, quantum of public housing, building standards, place making and independence from Lucan and Clondalkin. As a solution it is suggested that Clonburris be 'gotton right'; that a local transport system be set up; and that thousands of proposed new dwellings are in public ownership. (DraftClonSDZ0358, Eoin Ó Broin)





- 15. The planning of the M50 should not be repeated and planning should happen as such that it is still relevant in 50 years. (DraftClonSDZ0394, Richard Daly)
- 16. Submission outlines that due consideration must be given to the real and serious concerns raised by residents of Clondalkin, Lucan and surrounding areas, with regards to traffic, public transport, community facilities and services as well as job opportunities. (<a href="https://prescriptors.org/learned-to-services-to-service
- 17. Submission from South Dublin County Disability Advisory and Consultative Panel outlines the SDZ needs a strong commitment to universal access (<u>DraftClonSDZ0503</u>, <u>Selina Bonnie</u>)
- 18. The Eastern and Midland Regional Assembly submission states that the proposed Planning Scheme would make a significant contribution to South Dublin's housing needs, with sequential development of lands in tandem with the phased provision of supporting social infrastructure including 6 new schools, health and childcare facilities and retail service provision. (DraftClonSDZ0296, malachy Bradley, Eastern and Midland Regional Assembly)
- 19. Clonburris should have its own social and transport infrastructure including bus service, roads, parking, parks, gaa club, football club, community centre, police station and fire station. (DraftClonSDZ0434, Nathaniel Doyle)

It is the aim of Section 1.3 of the Draft Planning Scheme to define a set of viable and robust overarching principles, to directly inform the development and implementation of the Clonburris SDZ Planning Scheme. Eighteen overarching principles are included in the Draft Planning Scheme covering the range and depth of issues that are central to the emergence of an exemplar new sustainable community at Clonburris.

Having regard to the submissions made and issues raised, it is considered that the Council has responded to the overarching principles identified, by preparing a Draft Planning Scheme that takes account of these multi-faceted principles and offers a comprehensive evidence based approach to the formulation of an integrated masterplan for the SDZ lands. The Draft Planning Scheme provides for a residential target of 8,437 new homes together with a range of community and other non-residential floorspace, to be delivered on a phased basis, as is the delivery mechanism essential to an SDZ Planning Scheme. The Draft Planning Scheme also offers a range of movement options and integrated public transport, green and blue infrastructure, services, infrastructure and energy proposals, parks and open spaces, heritage and biodiversity measures, all to be delivered as part of a rationalised phasing and implementation approach. Having regard to safety and anti-social behaviour the Draft Planning Scheme adequately accounts for the provision of community facilities, accessibility and passive surveillance of areas of open space and public realm.

Furthermore, it is considered that the Draft Planning Scheme prepared for this site, which is at the heart of South Dublin County, has been undertaken in a way that articulates and enlivens the development potential of the lands, looks beyond the boundary of the SDZ, seeks to achieve integration with the adjoining communities of Adamstown, Lucan and Clondalkin, and contribute to the development and future growth of the wider South Dublin County beyond. This approach has also provided for the integration of key existing assets on the site and adjoining the SDZ lands, in particular the Grand Canal, Griffeen Valley Park and the Kildare rail line. As such, it is considered that the Draft Planning Scheme represents a comprehensive shared outlook and a collaborative blueprint to unlock the economic, social and environmental development of the SDZ lands.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.





1.4 Introduction to the Strategic Development Zone Framework

- 1. Welcomes the publication of the Clonburris Draft SDZ Planning Scheme as a significant step in progress to address the housing shortage in the Dublin Metropolitan Area in the short term and to create a viable and well served urban community in the longer term. To maintain progress it is recommended that the principles of 'kick-start' should be at the forefront in masterplanning future development. (DraftClonSDZ0335, Dietacaron)
- 2. Objection to SDZ Planning Scheme from Clondalkin Resident by reason of over population, anti—social behaviour, crime, illegal dumping and traffic congestion along Fonthill Road, New Nangor Road and in Clondalkin Village. (DraftClonSDZ0019, Edel Cassidy)
- 3. Submission outlines that area is too busy already and the development could be moved inland easier (<u>DraftClonSDZ0008</u>, <u>Stephen John</u>)
- 4. Submission objects to the plans and outlines that Government are irresponsible to entertain houses in an already overly populated area. (<u>DraftClonSDZ0010</u>, <u>Conor McGuinness</u>)
- 5. Submission objects to the plans as huge new housing developments at Tullyhall, St. Helens, Somerton and Dodsboro have just gone up. The 8000+ houses in this plan are insane in this context. This 8000+ is a potentially disastrous idea, socially, economically (damage already struggling houses prices) and environmentally. (<u>DraftClonSDZ0010, Conor McGuinness</u>)
- 6. Clonburris SDZ will not address the housing crisis and the 10% social housing will not make a dent in the current figures. The issue of available housing/social housing is much broader than lack of affordable housing lack of credit, tax, lack of deposit, education and support etc. (DraftClonSDZ0043, Jeanine Nolan)
- 7. Lucan resident objects to overall planning scheme on the basis of traffic congestions and lack of supply of schools. (<u>DraftClonSDZ0211</u>, <u>Sinead Battle</u>)
- 8. Adding a whole new town between Lucan and Clondalkin is a bad idea, the existing problems in the area need to be addressed first before more houses, cars etc are added.

 (DraftClonSDZ0052, Lynda Curtis)
- 9. Submission outlines that scale and timing of development will be detrimental to the Lucan Area. (DraftClonSDZ0278, Liam Swan)
- 10. Welcomes the designation of the Clonburris site to accommodate the fast track delivery of much needed residential and community development which will integrate with the existing settlement structure/hierarchy of the area. (<u>DraftClonSDZ0305</u>, <u>Tesco Ireland Limited</u>, <u>Tesco Ireland Limited</u>)
- 11. Clonburris is an unsuitable location for an SDZ given its proximity to the unfinished SDZ at Adamstown. (<u>DraftClonSDZ0224, Valerie Mcneill</u>)
- 12. Clondalkin is home to many of the most deprived communities in Ireland, this development will compound this disadvantage further.
 Clonburris is poorly conceived both physically and socially. (<u>DraftClonSDZ0228, Diane</u> O'Connell)
- 13. It is acknowledged that the SDZ lands, which comprise approximately 280 hectares, are deemed to be of economic and social importance to this County, to Dublin and to the State and that we have a Housing Emergency. (DraftClonSDZ0399, Guss O'Connell)
- 14. The designation of the Clonburris lands as a Strategic Development Zone is welcomed, during the housing and emergency accommodation crises however the urgent need for housing must not lead to bad planning and rushed development. (DraftClonSDZ0308, Madeleine Johansson, People Before Profit)
- 15. Submission outlines that the houses should not be provided in Clondalkin but dispersed to other areas with open space and where proper roads and infrastructure can be provided before people move in. (<u>DraftClonSDZ0496, Seamus MacMaolduin</u>)

Clonburris



- 16. Welcomes the designation of the Clonburris SDZ and the future development of a sustainable new district in West Dublin. (DraftClonSDZ0337, Hines Real Estate Ireland Limited)
- 17. The SDZ is to take place on one of the few areas of green left in the location and there are other lands throughout Dublin that could be used. (DraftClonSDZ0587, Deirdre Madden)
- 18. Submission from resident of Ashwood objecting to building of Clonburris SDZ as the area cannot cope with 21,000 people added. (<u>DraftClonSDZ0591</u>, <u>Margaret Madden</u>)
- 19. The SDZ is to take place on one of the few areas of green left in the location and there are other lands throughout Dublin that could be used. (<u>DraftClonSDZ0591</u>, <u>Margaret Madden</u>)
- 20. Submission from resident of Ashwood objecting to building of Clonburris SDZ as the area cannot cope with the people or traffic of the proposed building. (<u>DraftClonSDZ0592</u>, <u>Peter Madden</u>)
- 21. Submission objects to the building of the proposed Clonburris SDZ and outlines that the green areas are currently safe areas used for dog walking and are the nearest amenity for many local people. (<u>DraftClonSDZ0592</u>, <u>Peter Madden</u>)
- 22. The Clonburris SDZ is premature in its plan as Adamstown is still in its infancy and other lands in Clondalkin/Lucan are ready for development (<u>DraftClonSDZ0606</u>, <u>Sandra Scully</u>)

The Draft Planning Scheme for the Clonburris SDZ has been prepared as a direct result of Government legislation (S.I. No. 604 of 2015). The SDZ Order identifies the lands at Clonburris, consisting of 280 hectares, as a site for the establishment of an SDZ and deems the lands to be of economic and social importance to the State. The Government's position on the Clonburris SDZ is reinforced by the classification of the SDZ lands as a Major Urban Housing Development Site (MUHDS), and also the allocation of funding in 2017, to the SDZ lands under the Local Infrastructure Housing Activation Fund (LIHAF).

Furthermore, in preparing the Draft Planning Scheme, the Council undertook a comprehensive evidence based approach, including the preparation of a range of supporting documents including a Transport Assessment and Transport Strategy, Strategic Flood Risk Assessment, Surface Water Strategy, Retail Study, Employment Floor Area Demand Study, Energy Masterplan, and Archaeological and Architectural Heritage Inventory.

The Draft Planning Scheme provides for a residential target of 8,437 new homes together with a range of community and other non-residential floorspace, to be delivered on a phased basis, as is the delivery mechanism essential to an SDZ Planning Scheme. The Draft Planning Scheme also offers a range of movement options and integrated public transport, green and blue infrastructure, services, infrastructure and energy proposals, parks and open spaces, heritage and biodiversity measures, all to be delivered as part of a rationalised phasing and implementation approach.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.

1.6 Policy Context

The SDZ designation by Government reflects the strategic importance of the Clonburris site
and its potential to provide a significant new residential neighbourhood in the Dublin
Metropolitan area where the current national undersupply of new homes and high rental





costs are most acutely apparent. (<u>DraftClonSDZ0268</u>, <u>Maude Ni Bhrolchain</u>, <u>Department of Housing</u>, <u>Planning and Local Government</u>)

- Submission on behalf of landowner (Cairn Homes PLC) suggests that the Draft Planning Scheme should recognise that any existing or future planning policy requirements contained in Section 28 Guidelines should take precedence. (<u>DraftClonSDZ0351</u>, <u>Cairn Homes Plc</u>, <u>Cairn Homes</u>)
- 3. The Eastern and Midland Regional Assembly submission states that the Assembly recognises the consideration given to national and regional planning policy and the potential of the site to provide for a new planned community and to address the housing needs of South Dublin and the wider GDA. It is considered that the Planning Scheme benefits from the proper integration of land use and transportation planning and will contribute to the proper planning and sustainable development of the area. (DraftClonSDZ0296, malachy bradley, Eastern and Midland Regional Assembly)
- 4. Lucan resident objects to plan for additional housing in the area on the basis of anti-social behaviour, traffic congestion and the lack of bus or train services. (<u>DraftClonSDZ0175</u>, <u>Ingrid Gartland</u>)
- 5. Resident suggests that development should take place in areas outside Tallaght and Clondalkin to prevent sprawling development. (<u>DraftClonSDZ0244, roisin domican</u>)
- 6. SDCC is also reminded to have regard to any observations made by the Office of Public Works, Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs, National Parks & Wildlife Service, Environmental Protection Agency and Irish Water. In this regard, SDCC must satisfy itself that it has met the relevant requirements as appropriate, and that the Draft Planning Scheme is fully compliant with its obligations under planning legislation. (DraftClonSDZ0268, Maude Ni Bhrolchain, Department of Housing, Planning and Local Government)
- 7. The Council will be aware that the Government has also designated the Clonburris site as a Major Urban Housing Delivery (MUHD) site under the Rebuilding Ireland programme. This status further underlines its strategic national importance for the construction of new homes and builds on the Government's significant capital investment in rail infrastructure serving the site completed under the Kildare Route Investment Project. (DraftClonSDZ0268/Bhrolchain, Department of Housing, Planning and Local Government)
- 8. SDCC was allocated €3million under the Local Infrastructure Housing Activation Fund (LIHAF) to fund construction of enabling surface water infrastructure at Clonburris. This LIHAF grant coordinates with the comprehensive infrastructural services and environmental strategy included in the Draft Planning Scheme and the overall construction of a new community supported by the required public infrastructural investment. (<u>DraftClonSDZ0268, Maude Ni Bhrolchain, Department of Housing, Planning and Local Government</u>)
- The Department will continue to work with SDCC in the development of Clonburris and support the Council by maximising co-ordination of public investment programmes of the range of state agencies and government departments involved in the development of the SDZ area. (<u>DraftClonSDZ0268</u>, <u>Maude Ni Bhrolchain</u>, <u>Department of Housing</u>, <u>Planning and Local Government</u>)

Chief Executive's Response

The Draft Planning Scheme is consistent with current guidance, strategies and policies at national, regional and local level. The hierarchy of national, regional and local guidance and plans, taken into account, are shown in Figure 1.3 of the Draft Planning Scheme. This includes Rebuilding Ireland which sets ambitious national targets for the provision of new housing in Ireland in the period to 2021. It is noted that the implementation of Rebuilding Ireland through the Local Infrastructure Housing Activation Fund (LIHAF) has included Clonburris in the initial funding allocation for 2017.





Furthermore, having regard to the location of the SDZ lands, it is noted that the site is identified as a strategic residential development site in 'Planning and Development of Large-Scale, Rail Focused Residential Areas in Dublin Region' (NTA, 2013) and is also classified as a Major Urban Housing Development Site (MUHDS) by the Government.

The Draft Planning Scheme has been prepared within this strategic context as being suitable for a range of residential and non-residential development, to be delivered on a phased basis, together with supporting community facilities, services and infrastructure. This confirms the importance of the SDZ lands in addressing the need for new residential development to meet demand in South Dublin County and the Dublin Region.

As stated in the Draft Planning Scheme, any Section 28 Guidelines referenced in the Scheme may be superseded by subsequent publications and these shall be applied accordingly.

The Draft Planning Scheme has been prepared having regard to the range of submissions received from the public, stakeholders, relevant agencies and prescribed bodies, as summarised and addressed in this Chief Executive's report.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.









2.0 Planning Scheme Framework

Section 2.1 Land Use and Density

2.1.3 Types of Development

- 1. Hotels and Restaurants are welcomed and should be placed near the rail stations. (DraftClonSDZ0050, Pamela Corrigan, Labour Party Clondalkin Branch/ Dublin Mid West)
- Request from member of the Ahmadiyyia Muslim Association to designate 12th lock, the Grange, Hayden's Lane, Adamstown, Lucan County Dublin for community facilities. (DraftClonSDZ0061, Amtul Hafeez DraftClonSDZ0064, ZAHEER AHMAD DraftClonSDZ0065, IFTIKHAR AHMAD DraftClonSDZ0066, AMJAD MAHMOOD AHMAD DraftClonSDZ0067, Asad Iftikhar DraftClonSDZ0068, Muhammad Ahsan DraftClonSDZ0069, Razia Begum DraftClonSDZ0091, M Ahmed DraftClonSDZ0092, QuratUI Ain DraftClonSDZ0081, shamifa Zaheer DraftClonSDZ0085, Rizwan Ahmad DraftClonSDZ0086, Saliha Asad DraftClonSDZ0087, Shama Asad DraftClonSDZ0093, Rafig Ahmed DraftClonSDZ0094, mussarat ch <u>DraftClonSDZ0095</u>, imdad ch <u>DraftClonSDZ0161</u>, Izza Afrinish Ahmed <u>DraftClonSDZ0130</u>, Rubina Nusrat DraftClonSDZ0129, Daulat Bibi DraftClonSDZ0128, Khalida Parveen DraftClonSDZ0089, Amna Nadeem DraftClonSDZ0127, Sajida Aleem DraftClonSDZ0126, Shazia Abbas DraftClonSDZ0125, Tuba Abbas DraftClonSDZ0090, khizar hayat DraftClonSDZ0124, Maryam Abbas DraftClonSDZ0123, Khadija Begum DraftClonSDZ0122, Quratulain Habib DraftClonSDZ0121, shamim Ashraf DraftClonSDZ0074, ABDUL RAUF KHAN DraftClonSDZ0076, Rafiq Ahmed DraftClonSDZ0077, QuratUI Ain DraftClonSDZ0078, M Ahmed DraftClonSDZ0080, sikandar ch DraftClonSDZ0112, Aleem Uddin DraftClonSDZ0160, Daniyal Ahmed DraftClonSDZ0158, ambreen rauf DraftClonSDZ0155, Tariq Shaikh <u>DraftClonSDZ0151</u>, <u>Hafiz Ahkhtar Rashid DraftClonSDZ0114</u>, <u>Fareeha Aleem</u> DraftClonSDZ0115, Sehrish Zahoor DraftClonSDZ0120, Muhammad Ishaq DraftClonSDZ0116, Zahid Kamran DraftClonSDZ0118, Afshan Kamran DraftClonSDZ0119, sukhan gul DraftClonSDZ0117, Maiza Kamran DraftClonSDZ0131, Noma Akhter DraftClonSDZ0132, Shafia Begum DraftClonSDZ0133, Amtul Hayee DraftClonSDZ0134, Humayun Malik DraftClonSDZ0135, Shehla Akhter DraftClonSDZ0136, Baria Maryam DraftClonSDZ0137, Sumaira Malik DraftClonSDZ0138, Mariam Ishaq DraftClonSDZ0139, faiza Tul-Aleem DraftClonSDZ0172, Aisha Humayun DraftClonSDZ0060, Rabeeb Ahmed Mirza DraftClonSDZ0104, nusrat un nisa DraftClonSDZ0105, nusrat un nisa DraftClonSDZ0109, Nadeem Amjad DraftClonSDZ0141, Habib Ahmad DraftClonSDZ0142, Jamal Ahmed <u>DraftClonSDZ0144, Sadia Saleem</u> <u>DraftClonSDZ0145, Shahida Parveen</u> <u>DraftClonSDZ0146,</u> Najma Nadeem DraftClonSDZ0147, Sadia Saleem DraftClonSDZ0148, Shahida Parveen DraftClonSDZ0149, Hiba Nadeem DraftClonSDZ0150, Shamsa Shaikh)
- 3. Submission from President and Directors of the Ahmadiyya Muslim Community advises that there appears to be very little provision for community/civic/religious uses in the overall plan and no provision west of the R136 outer ring road. It is advised that a distribution of community, civic and local nodes throughout the proposed development areas would provide residents with access to services and facilities that are within walking distance. (DraftClonSDZ0250, M Anwar Malik, Ahmadiyya Muslim Association DraftClonSDZ0340, Shahid Ahmed, Ahmadiyya Muslim Association Ireland DraftClonSDZ0252, Dr Mashood Ahmed, Ahmadiyya Muslim Association Ireland DraftClonSDZ0253, mansoor malik DraftClonSDZ0256, Fazal Ur Rehman Butt, Ahmadiyya Muslim Association Ireland)
- 4. Clondalkin resident supports development of Clonburris on the basis of the absence of choice and supply of housing in the area. (<u>DraftClonSDZ0282</u>, <u>Josephine Kavanagh</u>)





- 5. Submission from CIE requests that explicit reference be made in the Draft Planning Scheme in relation to considering works in relation to existing land uses, existing public transport and proposed new public transport under Development Plan policies. It is also requested that the draft Planning Scheme makes provision to allow for infrastructure associated with future public transport projects such as a substation under the DART Expansion Programme.
 (DraftClonSDZ0295, Aidan Ruane, CIE Group Property Management DraftClonSDZ0346, Aidan Ruane, CIE Group Property Management)
- 6. Submission on behalf of Ahmadiyya Muslim Association Ireland outlining there appears to be very little provision for community / civic / religious uses in the overall plan and no provision at all for such uses on any part of the lands west of the R136 outer ring road. This appears to us to be rather short-sighted and to call into question the sustainability of the overall plan. Surely an even spread of community / civic / landmark and local nodes throughout the proposed development areas would allow residents to have access to at least some services and facilities on foot. Submitter feels site (at Haydens Lane) could play a role in broadening the mix of uses available at the Newcastle Road / Adamstown end of the SDZ area. (DraftClonSDZ0342, Muhammad Anwar Malik, Ahmadiyya Muslim Association)
- 7. Joint submission from local representatives highlights concerns in relation to provision for nightclub, hotel/hostel and residential institution uses in residential areas and it is requested that these uses be removed from Table 2.1.1. (<u>DraftClonSDZ0419</u>, <u>Cllr. Emer Higgins</u>, <u>Cllr. Vicki Casserly & Cllr. Kenneth Egan</u>)
- 8. Submission outlines that betting offices and nightclub should not be listed as open for consideration in residential areas (<u>DraftClonSDZ0502</u>, Ed O'Brien & John Curran TD, Fianna Fail Dublin Mid West)

Community Uses and Places of Worship

Further to concerns raised in submissions and suggestions in relation to provision for community facilities, it is advised that Community Centres are listed as permitted in principle in Residential and Mixed Use areas of the Draft Planning Scheme and are also listed as open for consideration in Open Space Areas. This is largely consistent with the land use approach of the South Dublin County Council Development Plan and has been informed by the key principles of the Draft Planning Scheme to locate community centres within mixed use urban centres and local nodes in residential areas in the interest of place making and promoting vitality and viability in such centres.

For other locations such as areas of open space, it is a requirement under Section 2.7.2 (Community Buildings) for a robust assessment of proposed community facilities to be carried out having regard to the urban centre hierarchy, the target catchment, accessibility and the availability of alternative sites and floorspace. Within this context it should be noted that it is a key objective of the Draft Planning scheme to extend Griffeen Valley Park as a strategic area of open space and flagship park that will accommodate sports fields, amenity routes, SUDS, areas of biodiversity, play areas and planting.

Further to concerns in relation to the distribution of community, civic and religious uses it is advised that such uses are supported across the Plan Lands including on the western side of the SDZ lands. Places of worship, community and civic uses are supported in both the Kishoge (western side of SDZ lands) and Clonburris (eastern side of SDZ Lands) Urban Centres. Furthermore Community Centre uses are supported across four local nodes that are dispersed within residential areas across the Plan Lands including the Grange Local Node on the western side of the Plan Lands. The Urban Centres and Local Nodes are located along Strategic Link Streets and strategic pedestrian and cycle routes in order to maximise their accessibility from surrounding residential development.





Public Services

Further to the concern raised in a submission in relation to the potential for the Draft Planning Scheme to affect works in relation to existing and proposed public transport including infrastructure, it is advised that it is a key principle of the SDZ Planning Scheme to maximise existing and proposed public transport opportunities including rail services. Within this context, Public Services are listed as permitted in principle in the residential and mixed use areas of the Plan Lands. Furthermore, there is provision under Section 2.1.3 of the Draft Planning Scheme that allows works relating to existing development that has planning permission or is in existence prior to Planning and Development Legislation.

Nightclub, Hotel and Residential Uses

Further to submissions in relation to nightclub uses it is advised that such uses are listed as open for consideration in residential areas (includes the four local nodes) and mixed use areas (includes Clonburris and Kishoge Urban Centres) and that this is consistent with the land use approach of the South Dublin County Council Development Plan 2016 – 2022. Such proposals will be subject to detailed assessment and scrutiny at planning applications stage in terms of impact on existing surrounding and proposed uses.

Hotel/hostel and residential institution uses are listed as permitted in principle in residential areas given that these are compatible with residential uses. Residential institution uses essentially constitute a residential use and this is consistent with the land use approach of the South Dublin County Council Development Plan 2016 – 2022. Hotel/Hostel uses are also listed as permitted in principle for mixed use areas under the Draft Planning Scheme and this is consistent with the requirements of the SDZ Order (December, 2015) for the subject lands.

It is advised that Betting Offices are listed as open for consideration in Local Nodes only in the residential land use area and such uses will also be subject to detailed assessment and scrutiny at planning application stage in terms of impact on existing surrounding and proposed uses. Furthermore, such uses are listed as permitted in principle in urban areas subject to compliance with the restriction of uses provisions (Section 2.4) of the Draft Planning Scheme. This again is consistent with the land use approach of the South Dublin County Council Development Plan.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.

2.1.4 Extent of Development

- Submission on behalf of landowner (Cairn Homes PLC) makes suggestions in relation to the Function Concept Map (Fig. 2.1.3) in relation to correction of a typo (Mixed Use Non Retail Residential vs Mixed Use –Retail and Residential) and removal of the term 'retail' in relation to frontages particularly where retail uses are precluded. It is also advised that net areas in Table 2.1.4 do not tally. (DraftClonSDZ0351, Cairn Homes Plc, Cairn Homes)
- 2. Submission on behalf of landowner (Cairn Homes PLC) suggests that Neighbourhood Parks be included in the calculation of sub sectors and highlighted as yellow (residential) by reason of implications in relation to the calculation of densities and in order to correctly reflect net development areas. (DraftClonSDZ0351, Cairn Homes Plc, Cairn Homes)
- 3. Submission on behalf of landowner (Cairn Homes PLC) requests that, in order to add to flexibility, a note be added to figures to indicate that Local parks/Squares and Schools are indicative in relation to location and configuration (particularly in relation to KUC-S4, CUC-



S3, CSW-S3, KSE-S1, CSW-S2 and Barony Park Co-Located Schools). (<u>DraftClonSDZ0351, Cairn Homes</u>)

- 4. Submission on behalf of landowner (Cairn Homes PLC) suggests that the provisions for transferrable non-residential floorspace be clarified in terms of issues of land ownerships and availing of the benefits. (DraftClonSDZ0351, Cairn Homes Plc, Cairn Homes)
- 5. Submission on behalf of landowner (Cairn Homes PLC) requests that the residential allocation within the Planning Scheme be expressed in sq.m to allow for residential formats emanating from recent Section 28 Guidelines and circulars including student housing, built to rent apartments, shared living and housing for older people. It is also stated that 'quasi' residential uses such as student accommodation should be considered under the employment allocation. (DraftClonSDZ0351, Cairn Homes Plc, Cairn Homes)
- 6. Submission from NAMA outlines that the quantum of employment space and retail space will mean Clonburris becomes a destination for these uses and undermines the principal housing supply objective of the SDZ Order. Submitted that there is unlikely to be a market for office space at this location and refers to vacancy at Clongriffin and Pelletstown. (DraftClonSDZ0350, Deirdre O'Connor National Asset Management Agency, NAMA)
- 7. Joint submission from local representatives requests clarity in terms of the number of proposed dwellings (8,437 vs 9,192 dwellings) (<u>DraftClonSDZ0419, Cllr. Emer Higgins, Cllr. Vicki Casserly & Cllr. Kenneth Egan</u>)
- 8. No objection to development on the northern side of the Canal. (<u>DraftClonSDZ0466</u>, <u>Brian Thunder DraftClonSDZ0461</u>, <u>Maura Thunder DraftClonSDZ0462</u>, <u>Liam Thunder DraftClonSDZ0463</u>, <u>Louise Thunder DraftClonSDZ0464</u>, <u>Claire Thunder DraftClonSDZ0465</u>, Emma Thunder)
- 9. Submission on behalf of Everglade Properties Ltd (in receivership) outlines that an assessment undertaken by Cushman & Wakefield (Commercial Property Consultants) has indicated that the development of the Private Rental Sector (PRS) model in Clonburris may be viable in the medium to long term. Submission requests that in place of some of the commercial floorspace allocation, consideration should be given to the inclusion of the development of Private Rental Sector (PRS) units as an option within the Clonburris Urban Centre and the incorporation of higher densities for such schemes. (DraftClonSDZ0343, Everglade Properties Limited (In Receivership) Everglade Properties Limited (In Receivership))
- 10. There is a need for housing and the reduction of employment space in this draft plan compared to the previous one is welcomed, considering the large numbers of vacancies in existing industrial estates throughout the county. (<u>DraftClonSDZ0308</u>, <u>Madeleine Johansson</u>, <u>People Before Profit</u>)
- 11. Concern is raised in relation to the provision of retail, commercial and employment floor space at Kishoge which is less than Clonburris. It is considered that the centres should have a more balanced provision that is similar to Clonburris. (DraftClonSDZ0504, South Dublin County PPN, South Dublin County Public Participation Network)

Chief Executive's Response

Function Concept Map

Further to concerns raised in relation to the Function Concept Map (Figure 2.1.3), it is accepted that the key to the figure should be amended to clarify that retail and employment uses are intended for mixed use areas.

It is advised that Figure 2.1.3 appropriately reflects intended primary and secondary retail frontages within and adjacent to the Clonburris and Kishoge Urban centres in accordance with the principles of place making, the retail planning guidelines and the key principles of Section 2.4 (Urban Centres) of





the Draft Planning Scheme including the creation of vibrant urban centres. Further to the provisions of Section 2.4.3 (Urban Design) of the Draft Planning Scheme, secondary retail frontages within urban centres and around adjacent squares in residential areas are intended for lower order retail, service and commercial uses. This is consistent with uses that are permissible and open for consideration in such areas.

Net Development Areas

Further to submissions in relation to the calculation and indication of net development areas under the Draft Planning Scheme, it is advised that these have been indicated and calculated in accordance with the Guidelines for Sustainable Residential Development in Urban Areas (2009). The guidelines specifically state that open spaces serving wider areas should be excluded. Strategic open spaces and corridors that will serve more than one subsector or development area have therefore been excluded from the calculation of net development areas. It is considered that any amendment to this aspect of the Draft Planning Scheme would result in an incorrect and inconsistent calculation of net residential densities.

It is accepted that Table 2.1.4 requires correction in relation to the net area identified for the Canal Extension.

Employment and Retail Uses

Further to the submission that raises concerns in relation to allowing retail and employment uses, it is advised that employment and retail uses are prescribed under the Draft Planning Scheme in accordance with the SDZ Order (December, 2015) for the SDZ Lands. The Order designates the subject lands for commercial activities, including employment, office, and retail facilities. This is also consistent with the designation of Clonburris as a District Centre under the South Dublin County Council Development Plan 2016 – 2022 and the Retail Strategy for the Greater Dublin Area 2008 – 2016. The provision of a mix of uses in urban centres and local nodes also accords with the principles of place making, integrating land use and transport planning and the aims of the Draft Planning Scheme to provide vibrant urban centres and local nodes. The prescribed quantum of employment floorspace is supported by the Employment Floorspace Demand Study that accompanies the Draft Planning Scheme in terms of market viability. The Draft Planning Scheme also incorporates flexibility in terms of the location of non-residential floorspace by allowing up to 10% to be transferred between Development Areas.

Further to comments seeking clarity in relation to transferrable floorspace, Section 2.1.4 of the Draft Planning Scheme (extent of development) details the circumstances where non-residential floorspace can be transferred between development areas. The purpose of this is to allow some flexibility in relation to this aspect of the Planning Scheme from a market viability perspective. It is clearly stated that floorspace may only be transferred with the written agreement of the origin and destination landholding. This will require consultation between landowners and is consistent with the approach of the Adamstown SDZ Planning Scheme (2015). It is not considered that additional clarity is required in relation to this aspect of the Draft Planning Scheme.

Further to concerns in relation to the distribution of retail, commercial and employment uses, it is advised that a robust and co-ordinated approach has been applied to the hierarchy of urban centres designated within the SDZ Planning Scheme and the principles of integrating land use and transport planning. The designation of a higher order district centre at Clonburris has been informed by the existing public transport interchange (Clondalkin-Fonthill Railway Station) constructed at the Clonburris Urban Centre, which will be served by a Core Orbital Bus Route planned under the NTA Transport Strategy for the Greater Dublin Area (2016 – 2035). The location of two retails centres of a similar retail order and retail offer within close proximity of each other would also be at variance





with the Guidelines for Planning Authorities on Retail Planning (2012) in terms of competition, vitality and viability. Furthermore, it is advised that the SDZ lands have been designated for only one District Centre under the Retail Strategy for the Greater Dublin Area 2008 – 2016 and the South Dublin County Council Development Plan 2016 – 2022. The distribution of employment floorspace is more evenly balanced between the Kishoge and Clonburris urban centres in the context of (inter alia) the potential benefits from the proximity of Kishoge to Grange Castle Business Park.

Schools and Open Spaces

Further to suggestions in relation to provision of flexibility for schools and open spaces, it is advised that a robust approach has been taken in relation to the development of an integrated and coordinated masterplan for the SDZ lands. The location and extent of schools and open spaces has been scrutinised in relation to (inter alia) transport, movement, biodiversity and natural heritage. The SDZ Oder for the subject lands (December 2015) specifically states that the subject lands have been designated for the comprehensive planning and development in relation to (inter alia) residential development and schools. Furthermore, the Planning and Development Act 2000 (as amended) requires all Draft Planning Schemes to include proposals relating to amenities and schools. The inclusions of a dispensation in relation to these vital aspects would undermine the approach of the Draft Planning Scheme, would lead to uncertainty and would be at variance with the SDZ Order and Planning and Development Legislation.

Residential Uses and Prescribed Quantum

Further to queries raised in relation to the prescribed quantum of residential development, it is advised that the target dwelling number is set out under 2.1.5 of the Draft Planning Schema with a minimum and maximum margin that is based on density a margin of 10 dwellings per hectare. As set out under Section 2.1.4 and 2.1.5 of the Draft Planning Scheme, this allows flexibility and the lower end of the margin represents the minimum number of dwellings permissible while the upper end represents the maximum number of dwellings permissible. This approach is consistent with the Adamstown SDZ Planning Scheme (2015). It is advised that the rigid prescription of dwelling numbers would significantly undermine the viability of the Draft Planning Scheme and would not allow a margin of flexibility for market forces, diversity of design, place making, changing housing needs, site specific issues and detailed assessment at planning application stage.

Further to the submission requesting the prescription of floorspace for residential units, it is advised that the Draft Planning Scheme specifies dwelling numbers only in order to allow for flexibility in relation to the housing market and to future proof the scheme for additional Section 28 Planning Guidelines in relation to dwelling size standards etc. This is referenced under Section 2.1.6 (Dwelling Mix) of the Draft Planning Scheme and will allow for the delivery of a range of dwelling types and sizes.

In terms of the suggested treatment of alternative accommodation from landowners, the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2015) includes guidance on housing for students, older people and build to let units. It is within this context that such accommodation is considered to constitute residential development and the dwelling numbers prescribed under the Draft Planning Scheme will apply. In terms of dwelling mix, the Draft Planning Scheme is also consistent with the approach of the aforementioned guidelines, which states that prescribed dwelling mixes should not be applied to such accommodation including sheltered housing.

The provision of accommodation for students and older people (independent and semi-independent living) is also encouraged under Draft Planning Scheme (Section 2.1.6 Residential Development Standards) both within the Kishoge and Clonburris Urban Centres and their contiguous Development





Areas that are proximate to (inter alia) public transport services. There is also a suggestion in the submissions of a dispensation for housing for older people and student accommodation in relation to dwelling standards and this will help ensure flexibility to any subsequent planning guidelines. Within the context of the above, it is not considered necessary or appropriate to treat alternative housing as commercial development in terms of the assignment of floorspace or density.

Chief Executive's Recommendation

It is recommended that the following amendment be made to the Draft Planning Scheme:

Amend the Legend in Figure 2.1.3 (Function Concept Map) as follows: MIXED USE – NON-RETAIL, COMMUNITY, EMPLOYMENT AND RESIDENTIAL

Amend Table 2.1.4 (Development Areas) as follows: Canal Extension – 71.32 2.27

Strategic Environmental Assessment of Chief Executive's Recommendations

No interaction with Strategic Environmental Objectives.

Appropriate Assessment Screening of Chief Executive's Recommendations

No significant adverse impacts on European sites within the SDZ's zone of influence are predicted.

2.1.5 Residential Density

- Submission from the NTA advises that the number of people living close to and within
 walking distance of high capacity rail should be maximised and that the highest intensity of
 residential development should be focused at train stations. It is recommended that policy
 be inserted into the Planning Scheme that seeks to achieve maximum densities in each
 development area and that the term 'Target' in Table 2.1.8 be amended accordingly.
 (DraftClonSDZ0188, David Clements, National Transport Authority)
- 2. Submission on behalf of residents association advises that fewer houses should be built and the density kept low. (DraftClonSDZ0242, Deirdre Nolan, Cappaghmore Residents Group)
- 3. Submission on behalf of Clondalkin community group requests lower density development and less housing. (<u>DraftClonSDZ0246</u>, <u>George Graham</u>, <u>Westbourne Community Group</u>)
- 4. Submission outlines that the high density units are not evenly dispersed and the high density units are all based in the Clondalkin end of the Clonburris zone and close to the Train station. Similar projects in Clondalkin have not been successful and submission references Thornfield as an example of a run down area favourable to anti-social behaviour. Submission requests a more even spread of these units across the zone and a reduction in the use of Duplex units or Terraced 2 storey homes. (DraftClonSDZ0349, ian daly)
- 5. The average density of development should be no higher than that of the revised Adamstown SDZ. (<u>DraftClonSDZ0204, William Lavelle</u>)
- 6. Submission on behalf of landowner (Cairn Homes PLC) broadly supports density ranges but highlights concerns in relation to the inclusion of local parks and squares in the calculation of Net Development Areas thereby having the effect of increasing real residential densities. It is advised that local parks will account for 16-17% of lands within ownership of Cairn Homes (CSW-S3 and KSE-S1). It is also suggested that provision be included in the Planning Scheme to allow up to 10% of units in a sub sector to an immediately adjacent sub-sector. (DraftClonSDZ0351, Cairn Homes Plc, Cairn Homes)
- Lucan resident raises concerns in relation to housing density. (<u>DraftClonSDZ0353, Stephen O' Rafferty</u>)



- 8. Submission from NAMA outlines that the maximum density figure, in particular for the Clonburris Urban Centre, may be problematic and it may be necessary to exceed this density level in order to provide apartments at scale close to the rail station. Submission outlines that the Density Guidelines prescribe minimum densities of 50 plus at public transport nodes and outline that there should be no upper limit on the number of dwellings to maximise inner city and town centre population growth. (DraftClonSDZ0350, Deirdre O'Connor National Asset Management Agency, NAMA)
- Joint submission from local representatives welcomes the reduction in the quantity of proposed dwellings. (<u>DraftClonSDZ0419</u>, <u>Cllr. Emer Higgins</u>, <u>Cllr. Vicki Casserly & Cllr. Kenneth Egan</u>)
- 10. Submission on behalf of SDZ landowner of lands to the east of the Fonthill Road considers that the Scheme is not in keeping with the urban form of the area and the locational context of these lands in outer suburban Dublin. The objective of the SDZ is to build houses and not to be concerned with densities and subjective urban design assumptions.
 (DraftClonSDZ0344, Kelland Homes Ltd, Kelland Homes Ltd)
- 11. Concern is raised with regard to the density of the development which could result in the same population as Wexford town. (<u>DraftClonSDZ0224</u>, <u>Valerie Mcneill</u>)
- 12. Less density and less housing should be provided at Clonburris. (<u>DraftClonSDZ0251</u>, <u>Amanda</u> O'Sullivan)
- 13. The density of the development is a concern, in relation to sufficient infrastructure to cope with the new population and services required such as youth sport facilities and green areas. (DraftClonSDZ0258/, Robert McNeill)
- 14. Submission outlines that fewer dwelling should be provided for and keep density low (<u>DraftClonSDZ0499</u>, <u>Deirdre Nolan</u>)
- 15. Concern was raised in relation to the high density in particular eight storey developments and the prospect of private developers increasing the height restrictions. It is recommended that lower density with less housing should be proposed if infrastructure is not developed prior to housing construction. (DraftClonSDZ0504, South Dublin County PPN, South Dublin County Public Participation Network)
- Concern relating to the potential for high density housing adjacent to low density mature estates. (<u>DraftClonSDZ0537</u>, <u>John Vaughan DraftClonSDZ0536</u>, <u>Michael Jennings</u> <u>DraftClonSDZ0531</u>, <u>Adrienne O'Driscoll DraftClonSDZ0532</u>, <u>Ciaran O'Driscoll</u> <u>DraftClonSDZ0530</u>, <u>Kay Vaughan DraftClonSDZ0533</u>, <u>Marie Tweedy DraftClonSDZ0534</u>, <u>Shay Keogh</u>)
- 17. Submission welcomes the reduction in density from the previous plan (<u>DraftClonSDZ0498</u>, <u>Cllr Breeda Bonner</u>)
- 18. Submission outlines that setting density levels for an individual sub areas of planning unit, it is important that the sub area is not too large such to prevent the development of a variety of housing typologies. The density of the Clonburris Urban Centre is referenced as an example and it is outlined that the area and density range may prevent the provision of a mix of a higher density model and medium density housing scheme. (DraftClonSDZ0350, Deirdre O'Connor National Asset Management Agency, NAMA)
- 19. Sinn Féin submission welcomes the lower density levels compared to the excessive levels contained in the previous Clonburris SDZ. It is stated that target (8,437units) as set out in the Draft Planning Scheme should be the upper limit. Sinn Féin supports the concentration of higher densities close to the train stations. Submission states that the Draft Plan must be amended to provide lower the densities in those zones adjacent to existing residential areas (such as Ashwood etc.). Densities should be graduated upwards from the existing residential areas rather than imposing higher residential buildings immediately beside existing estates and traveller sites. (DraftClonSDZ0383, Eoin Ó Broin TD, Cllr Danny O'Brien & Cllr Mark Ward)





Chief Executive's Response

Compliance with Guidelines and SDZ Order

The densities prescribed under the Draft Planning Scheme are framed by the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), the Regional Planning Guidelines for the Greater Dublin Area 2004-2016 (RPGs, 2004) and the SDZ Order for Clonburris. This includes the promotion of higher densities particularly within walking distance of both railway stations located within the SDZ lands. It is advised that the proposed densities are lower when compared to the Clonburris SDZ Planning Scheme and Local Area Plan (2008).

Further to submissions that seek amendments to the prescribed densities on the SDZ lands, it is advised that the prescribed densities responds to the designation of Clonburris within a Metropolitan Consolidation Town under the RPGs, the positioning of the SDZ lands along a strategic public transport corridor and the designation of Clonburris as a Level 3 District Centre under the Retail Strategy for the Greater Dublin Area 2008 – 2016, in terms of ability to sustain residential development. It is within this context that the SDZ Order (December 2015) for the subject lands requires the development of a comprehensive scheme that makes efficient use of public investment in infrastructural facilities, including public transport. Prescribed densities are also similar to those in the Adamstown SDZ Planning Scheme (2015).

Further to the submissions that requires reduced densities or reallocation of densities, it is advised that the statutory Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) prescribes densities according to accessibility to services and infrastructure. A minimum density of 50 dwellings per hectare is prescribed for areas within 1 km of the rail station and 35 – 50 dwelling per hectare in other suburban areas of cities and larger towns. This is supported by the Regional Planning Guidelines for the Greater Dublin Area 2010 - 2022, which seek to focus housing and intensify development in areas within the Metropolitan Area of Dublin particularly where there is existing or planned high quality public transport, along multi modal corridors and within Metropolitan Consolidation Towns. It is advised that the economic value of such areas should not be eroded.

In accordance with the guidelines and the principles of accessibility, densities of between 50-77 dwellings per hectare have been prescribed for areas of the SDZ lands that are proximate to the Kishoge and Clonburris railways stations. Densities of between 39-49 dwellings per hectare have also been prescribed for other areas of the SDZ lands. This is supported by a comprehensive accessibility assessment that has been carried out for the Draft Planning Scheme in Chapter 7 of the Transport Assessment and Transport Strategy that accompanies the Draft Planning Scheme.

A reduction of densities, particularly in areas that has high accessibility to public transport, would represent an inefficient use of such lands and this would be at variance with the principles of proper planning and sustainable development including the integration of land use and transport planning. This would also be inconsistent with the requirements of the Regional Planning Guidelines, the aforementioned statutory guidelines on residential development and the SDZ Order for the subject lands. Such a reduction in density would therefore be at variance with the Planning and Development Act 2000 (as amended).

Density Ranges

To allow for more accurate management of densities and ensure that higher densities are achieved within appropriate areas, Development Areas are sub divided into sub sectors under the Draft Planning Scheme and densities are prescribed according to Sub Sector. It is a requirement for





development within each Sub Sector to be consistent with the density margins set out in Table 2.1.8 of the Draft Planning Scheme. The combined setting of densities at (a) density ranges and (b) sub sector level provides sufficient flexibility within each sub sector in terms of responding to changing market demands and allowing for the delivery of appropriate residential typologies.

Further to submissions in relation to amending/removing density margins, it is advised that each of the density margins are based on a density target, which is then subject to a permissible margin of 10 dwellings per hectare (+5dph, - 5dph). The density margins allow for an element of flexibility that can be achieved without materially amending the Draft Planning Scheme. The lower end of each of the density margins represents the minimum densities permissible and the upper end of each of the density margins represents the maximum densities permissible in each Sub Sector.

The prescribed mid-range figure has been calculated on the basis of the masterplan that has been designed for the SDZ lands (accessibility in particular) and the parameters of the Draft Planning Scheme. The target density figures add transparency and have contributed to robust and definitive assessments in relation to Transport Assessment, Strategic Environmental Assessment, Appropriate Assessment and surface water management. The removal of the target figure would result in a misrepresentation of the masterplan that has been developed for the Draft Planning Scheme and that has been utilised in the supporting documents that accompany the Draft Planning Scheme. Further to concerns on building height, the Draft Planning Scheme includes for building heights of between 2 and 6 storeys (buildings of 8 stories + are only permissible in specified landmark locations).

In terms of the suggestions to remove density margins, it is advised that the rigid prescription of dwellings numbers would significantly undermine the viability of the draft planning scheme and would not allow a margin of flexibility for market forces, changing housing needs, site specific issues and detailed assessment at planning application stage.

Further to suggestions in relation to the removal of a maximum density and the general response provided above in relation to density ranges, it is noted that the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) does not prescribe a maximum density for areas within 1 kilometre of a railway station. The Planning and Development Act 2000 (as amended), however, requires Draft Planning Schemes to specify the extent of development. The removal of density limits would therefore result in uncertainty in terms of overall assessment (transport, environmental, drainage etc.) and could allow development that exceeds the parameters of the Draft Planning Scheme (building heights, school provision, pubic open space provision etc.) and would contravene the said legislation.

Further to the suggestion to apply densities according to the delivery of infrastructure. It is advised that, under the Chapter 4 Phasing Strategy of the Draft Planning Scheme, the delivery of infrastructure will be managed in a more defined and precise manner and according to the delivery of dwelling numbers.

Net Development Areas

Further to submissions in relation to the calculation and indication of net development areas under the Draft Planning Scheme, it is advised that these have been indicated and calculated in accordance with the Guidelines for Sustainable Residential Development in Urban Areas (2009). The guidelines specifically state that open spaces serving wider areas should be excluded from the calculation of net development areas while more incidental open space and landscaping should be included.



Strategic open spaces and corridors that will serve more than one subsector or development area have therefore been excluded from the calculation of net development areas. Any smaller and more incidental areas of open space can be included in the calculation of net densities at planning application stage. It is considered that any amendment to this aspect of the Draft Planning Scheme would result in an inconsistent calculation of net residential densities.

Further to concerns in relation to the sufficiency of amenities to cater for the prescribed densities, it is advised that the Draft Planning Scheme provides for approx. 90 hectares of strategic open space and a minimum of 7,300 sq.m of community floorspace, which is considered will be sufficient to meet the needs of the projected residential population for the SDZ Lands.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.

2.1.6 Residential Development Standards

- Housing suited to single people, couples and families should be provided at Clonburris.
 Family homes in Clonburris should not be perceived as starter homes, this is necessary for Clonburris to mature as a community. (<u>DraftClonSDZ0050, Pamela Corrigan, Labour Party Clondalkin Branch/ Dublin Mid West</u>)
- 2. Care needs to be taken in how apartments are constructed and managed. Family units should be on the bottom three storeys so that parents can have easy access to their children. Higher level floors can be used for couples and single people. There should also be adequate areas for drying clothes, adequate storage facilities and a concierge and strong management system to ensure security and good maintenance of public areas.
 (DraftClonSDZ0050, Pamela Corrigan, Labour Party Clondalkin Branch/ Dublin Mid West)
- 3. Concerns raised in relation to the quantum of social housing exceeding 10%. It is suggested that social housing should be interspersed, no single fund/developer/charity be allowed to purchase units in bulk, and that the location of social housing be identified including sites that may be modified/amended/exempt. Submissions also suggests that existing Traveller Accommodation sites should be integrated into the future development and that such accommodation be included in the calculation of social housing provision. (DraftClonSDZ0098, Declan Donnelly DraftClonSDZ0099, Tanya McDonald Donnelly DraftClonSDZ0171, A Fahy DraftClonSDZ0173, Lisa Greene DraftClonSDZ0166, Andrew Mowatt DraftClonSDZ0044, Neil Nolan DraftClonSDZ0073, Jim Houlihan DraftClonSDZ0111, <u>Lucan Residents, Clonburris Lucan Action Group</u> <u>DraftClonSDZ0159, Paula McMahon</u> DraftClonSDZ0096, Laura Flanagan DraftClonSDZ0100, Frances Norton DraftClonSDZ0215, Graham Walsh DraftClonSDZ0216, LIONA O'TOOLE DraftClonSDZ0218, helen Nix DraftClonSDZ0219, Donncha Cleary DraftClonSDZ0107, Peter Corby, Griffeen Glen Residents Association DraftClonSDZ0220, Joe McDermott DraftClonSDZ0237, Hugh McSweeney DraftClonSDZ0255, James Haughton DraftClonSDZ0192, Brian O'Neill DraftClonSDZ0245, Stephen Murphy DraftClonSDZ0193, Kim Rice DraftClonSDZ0194, Brian Shortall DraftClonSDZ0235, Edina Almasi DraftClonSDZ0196, Andrea Panikova DraftClonSDZ0197, Damian McKillop DraftClonSDZ0231, Jennifer Winters DraftClonSDZ0198, Aine McKinlay <u>DraftClonSDZ0267, Niamh Brennan</u> <u>DraftClonSDZ0265, Ian McLean</u> <u>DraftClonSDZ0248,</u> Caroline O'Brien DraftClonSDZ0284, Evelyn Smyth DraftClonSDZ0285, Carol Hogg <u>DraftClonSDZ0290</u>, <u>Agnes Maher DraftClonSDZ0331</u>, <u>El</u>aine Patriarca DraftClonSDZ0238, Martin Whelan DraftClonSDZ0333, Gary Hore DraftClonSDZ0309, Kim O Halloran DraftClonSDZ0262, Joseph Dolan DraftClonSDZ0264, Christine Broderick DraftClonSDZ0266, Steven Abbey DraftClonSDZ0312, Tina Mc Garry DraftClonSDZ0054, Celine Dunning DraftClonSDZ0200, Lisa Murtagh DraftClonSDZ0206, Sean Smith DraftClonSDZ0278, Liam





Swan DraftClonSDZ0347, Una Mullaney DraftClonSDZ0191, Rafal Marzec DraftClonSDZ0204, William Lavelle DraftClonSDZ0393, Ronan Burke DraftClonSDZ0396, Emer Lynch DraftClonSDZ0397, Marta Isopo DraftClonSDZ0363, Marta Estalayo DraftClonSDZ0279, Lisa Fitzpatrick DraftClonSDZ0280, John Egan DraftClonSDZ0367, ciaran daly DraftClonSDZ0401, Joyce Dolan DraftClonSDZ0403, Kerrie Walsh DraftClonSDZ0352, Rita O'Brien <u>DraftClonSDZ0356</u>, Peter Flynn <u>DraftClonSDZ0359</u>, Denis Twohig, Westbury Court Residents Association DraftClonSDZ0110, Maria Smith DraftClonSDZ0101, Peter Kelly DraftClonSDZ0375, Anita Fletcher DraftClonSDZ0376, Marie Fitzpatrick DraftClonSDZ0378, Patrick Tully DraftClonSDZ0413, Tania Daly DraftClonSDZ0414, Fiona Moriarty DraftClonSDZ0417, Siobhan Donnelly DraftClonSDZ0420, Ian Lamon DraftClonSDZ0432, Sara <u>Lemos DraftClonSDZ0056, Elizabeth Grace</u> <u>DraftClonSDZ0143, colm grogan</u> DraftClonSDZ0472, Mark Brennan DraftClonSDZ0431, Andrew Shinnick DraftClonSDZ0183, karen hayes DraftClonSDZ0184, Barry Jenkinson DraftClonSDZ0185, Hazel Smyth DraftClonSDZ0433, Ciara Reidy DraftClonSDZ0435, Tilly Reidy DraftClonSDZ0186, Nicola Kennedy DraftClonSDZ0438, Des Delaney DraftClonSDZ0189, mark reid DraftClonSDZ0476, Lynne Cosgrave DraftClonSDZ0441, Liam Reidy DraftClonSDZ0477, Sarah Gill DraftClonSDZ0478, Muhammad Ali DraftClonSDZ0479, Anna Wezyu DraftClonSDZ0480, Gill Devereux DraftClonSDZ0450, Cherie Lynch DraftClonSDZ0449, Marian Spollen DraftClonSDZ0448, Declan Cotter DraftClonSDZ0225, Sarah Moroney DraftClonSDZ0447, Aine O'Sullivan DraftClonSDZ0444, Adrian Reidy DraftClonSDZ0445, Nuala Reidy DraftClonSDZ0257, Deirdre McIntyre DraftClonSDZ0294, Kenny Doyle DraftClonSDZ0297, Celine Kiernan DraftClonSDZ0298, Laura Spencer DraftClonSDZ0299, Sharon Cleary DraftClonSDZ0236, ISO Solutions Ireland, ISO Solutions Ireland DraftClonSDZ0497, Owner/ Occupier DraftClonSDZ0322, Catherine Brady DraftClonSDZ0491, Wayne Quinn DraftClonSDZ0390, Tom Fitzpatrick DraftClonSDZ0421, Lesley Keogh DraftClonSDZ0422, Jonathan Mercier DraftClonSDZ0423, Damien Moloney DraftClonSDZ0424, John Coleman DraftClonSDZ0425, Sinead Hall DraftClonSDZ0426, Breeda De Vines DraftClonSDZ0427, Ciara Weafer DraftClonSDZ0428, Helena Doyle DraftClonSDZ0429, Edelle Boles DraftClonSDZ0430, Ashleigh D'Arcy DraftClonSDZ0451, K E Fendic DraftClonSDZ0452, Leighanne Spollen DraftClonSDZ0453, Skirmante Doda DraftClonSDZ0454, Sean Shortt DraftClonSDZ0527, Laura Gaughan DraftClonSDZ0528, Bernard Gaughan DraftClonSDZ0525, Dermot McGreal <u>DraftClonSDZ0540, John McGivney, Finnstown Abbey Residents Association</u> DraftClonSDZ0541, Mags Phelan DraftClonSDZ0542, Ciara McHugh DraftClonSDZ0543, Terence Phelan DraftClonSDZ0544, Martina Magee DraftClonSDZ0545, Geoff Grice DraftClonSDZ0546, Sandra Coleman DraftClonSDZ0483, Nuno Limos DraftClonSDZ0485, Grace Quinn DraftClonSDZ0487, Liam Canty DraftClonSDZ0489, Sarah Walsh DraftClonSDZ0484, Liam Lynch DraftClonSDZ0482, Jason Shanley DraftClonSDZ0517, Niall and Sandra Harrington DraftClonSDZ0486, Brian Kennedy DraftClonSDZ0488, Michaela Larsson DraftClonSDZ0490, Elaine McManamly)

- 4. Submission notes that previous planning scheme provided for 15% social and affordable housing and it is advised that the percentage in the current planning scheme should be in the order of 30%. (DraftClonSDZ0140, Deaglán Ó Broin)
- 5. Submission advises that there should be provision in the Planning Scheme for older people to downsize in order to free up accommodation. (DraftClonSDZ0140, Deaglán Ó Broin)
- Submission in favour of making housing available as well as the inclusion of social housing, providing the infrastructure is put in place (prior to the dwellings being constructed) and that social housing is fully mixed within non-social housing. (<u>DraftClonSDZ0166</u>, <u>Andrew Mowatt</u>)
- 7. Submission observes that the development promotes no car use and the target buyers are limited. Landlords with a view to earning rental income would be more attracted to this development than an owner occupier and this will provide challenges to the growing





community. Proposal includes 10% of the development will provide social housing. However, if owner occupiers are not attracted to the development of car free housing, this 10% could be skewed and be determined and at the discretion of private landlords. This could affect the target demographic and then the growth of cohesive community. (DraftClonSDZ0202, siobhan stoneham)

- 8. Submission on behalf of residents association advises about the need for mixed social housing as opposed to large scale social housing developments. (<u>DraftClonSDZ0242, Deirdre Nolan, Cappaghmore Residents Group</u>)
- 9. 30% of the Council owned land within the Clonburris SDZ is used for Council housing as to increase the amount of Social Housing that is needed to deal with our housing crisis. (DraftClonSDZ0232, Cllr Francis Timmons)
- 10. That all housing is a mixed development of Social and Private in the Clonburris SDZ. (DraftClonSDZ0232, Cllr Francis Timmons)
- 11. High density housing pushes people into close proximity without space for families to grow or adequate outdoor areas. As Lucan grows, people need the option of adding an extension or converting a roof, but most new homes do not allow for this. (<u>DraftClonSDZ0055, Ellen Ward</u>)
- 12. The Part V requirements of 10% should apply across all SDZ lands. In order to ensure sustainable, integrated communities. Higher percentages should not be applied to publicly-owned lands. (DraftClonSDZ0204, William Lavelle)
- 13. Submission on behalf of landowner (Cairn Homes PLC) suggests further clarity in relation to student housing and housing for older people in terms of density and consideration as a residential or commercial land use. (DraftClonSDZ0351, Cairn Homes Plc, Cairn Homes)
- 14. Submission from Clondalkin resident highlights concerns in relation to a social housing provision is 10% and suggests that social housing can be used as a means of stabilising house prices. (DraftClonSDZ0358, Eoin Ó Broin)
- 15. Submission from local representative includes proposals in relation to amending the percentage requirement for the social housing on the SDZ lands together with the introduction of a requirement for affordable housing (30% combined) by reason that the lands are in public ownership, available infrastructure, the need for affordable housing, the context of the previous planning scheme, the SDZ order of the planning scheme, compliance with the County Housing Strategy, the potential for establishing a housing cooperative and the potential to levy development. (DraftClonSDZ0416, Joanna Tuffy, Labour Party, Lucan Electoral Area)
- 16. Joint submission from local representatives requests that social housing be 'pepper potted' in terms of design and location rather than provided in clusters. It is stated that social housing should not be located adjacent to areas with high levels of social housing.

 (DraftClonSDZ0419, Cllr. Emer Higgins, Cllr. Vicki Casserly & Cllr. Kenneth Egan)
- 17. Submission welcomes the provision of much needed Social and Affordable Housing in this SDZ. Submission encourages the Council to disperse and integrate such units equally throughout the development. A potential case study which may be of interest to the Council on Affordable Housing is the current Poolbeg SDZ proposals. (<a href="https://doi.org/10.2006/j.com/doi.org/
- Submission from South Dublin County Disability Advisory and Consultative Panel outlines housing should be lifetime adaptable and visitable (<u>DraftClonSDZ0503</u>, <u>Selina Bonnie</u>)
- 19. Submission outlines that the social housing should be distributed throughout the development (<u>DraftClonSDZ0502</u>, Ed O'Brien & John Curran TD, Fianna Fail Dublin Mid West)
- 20. Mixed social housing needed as opposed to large scale social housing developments (<u>DraftClonSDZ0499</u>, <u>Deirdre Nolan</u>)





- 21. Request that tenure be mixed, suggested split of 30/70 public/private. (<u>DraftClonSDZ0498</u>, Cllr Breeda Bonner)
- 22. Submission from CTDG outlines that the final plans should include Traveller specific accommodation, including group and standard housing options as well as residential caravan park bays. Submission recommends that needs of older Travellers, Travellers with disabilities and Traveller children be addressed in the final plan. (DraftClonSDZ0512, Stephen Browne, Clondalkin Travellers Development Group)
- 23. There is a need for mixed social housing as opposed to large scale social housing developments. Full consensus on ensuring that there is a mix of social and affordable housing and non-social and affordable housing within the same estates and apartment complexes. In order promote social inclusion and an active, energetic and safe community, it is important that social and affordable housing should not be in a separated area. (DraftClonSDZ0504, South Dublin County PPN, South Dublin County Public Participation Network)
- 24. It is recommended that the quality of housing should be a priority and suggestions including passive house types with CHP, intercoms, letterboxes, fire escapes and access. Developments should be well planned, with a mix of density and no higher than 3 stories. Houses should have closed gardens, off street parking and driveways. They should be aesthetically pleasing and should use design techniques to minimise antisocial behaviour. (<u>DraftClonSDZ0504</u>, <u>South Dublin County PPN</u>, <u>South Dublin County Public Participation Network</u>)
- 25. Housing should be planned as 'lifetime adaptable' including a retirement type housing so that they can meet the needs of residents as they progress through life. (<u>DraftClonSDZ0504</u>, <u>South Dublin County PPN</u>, <u>South Dublin County Public Participation Network</u>)
- 26. Queries whether social housing will be spread over the entire development or allocated to one area and notes the issues associated with stand alone social housing.
 (<u>DraftClonSDZ0524</u>, <u>John Roche DraftClonSDZ0521</u>, <u>Sarah Roche DraftClonSDZ0522</u>, <u>Carol Roche DraftClonSDZ0523</u>, <u>Catherine Roche DraftClonSDZ0551</u>, <u>Michael Roche DraftClonSDZ0552</u>, <u>Ciara Toner DraftClonSDZ0553</u>, <u>Greg Toner DraftClonSDZ0554</u>, <u>Jennifer Toner DraftClonSDZ0555</u>, <u>Bernadette Toner DraftClonSDZ0556</u>, <u>Lorna Toner DraftClonSDZ0557</u>, <u>Martin Toner</u>)
- 27. Clarification is sought with regard to the percentage of social housing within the SDZ and the allocation of housing to those on the SDCC housing lists. (<a href="https://docs.py.ncbi.nlm.
- 28. Serious consideration should be given to the type of housing built and tenure types at Clonburris, prioritising first time buyers over speculative investors. (<u>DraftClonSDZ0515</u>, <u>Christopher Conway</u>)
- 29. Further information is requested with regard to the number of vacant houses at present in South Dublin County that are under the Council's remit. A question is raised as to whether the Council has carried out audits of its existing housing stock, including those that are rented and vacant. (DraftClonSDZ0514, The Tracey Family)
- 30. Clarity is sought with regard to the mix and location of Social and Affordable housing on the SDZ lands. (DraftClonSDZ0514, The Tracey Family)
- 31. Sinn Fein submission states the Clonburris SDZ must explicitly outline how it will assist in meeting the existing housing need within Dublin Mid-West. It is stated that 26% of the SDZ land zoned for residential development, is owned by South Dublin County Council equating to approximately 2,110 homes of the lower range of 8,437 homes proposed in the draft plan. 10% of the remaining 6,327 homes must be purchased by the Local Authority under Part V of the Planning and Development Acts for the provision of social and affordable housing, equating to approximately 632 homes. Sinn Féin believes that 36% of the total housing provided in the SDZ, equating to approximately 2,742 homes, should be





developed/acquired by South Dublin County Council and Approved Housing Bodies, to meet existing social and affordable housing need. This housing should be developed in well-built and well maintained mixed income and mixed tenure estates including social, affordable rental and affordable sale homes. This housing should be funded directly by Central Government and its development, with the exception of the Part V units, should be led by the Local Authority. To ensure that these Council led mixed income and mixed tenure estates are fully integrated into the overall development of the SDZ plan the Council should actively engage with private land owners in appropriate land swaps to facilitate proper social integration. South Dublin County Council should engage with private land owners and developers to ensure the maximum level of integration between the public and private residential developments

(DraftClonSDZ0383, Eoin Ó Broin TD,Cllr Danny O'Brien & Cllr Mark Ward)

- 32. Sinn Fein submission states that the Council must ensure that the housing needs of all sections of the community are catered for in the SDZ, including the Traveller community. Additional traveller specific accommodation must form part of the plan and Sinn Fein would urge the Council to engage actively with the Local Traveller Accommodation Consultative Committee. (DraftClonSDZ0383, Eoin Ó Broin TD, Cllr Danny O'Brien & Cllr Mark Ward)
- 33. Sinn Fein submission requests that 25% of the entire housing within the SDZ plan is provided at affordable levels. This would require at least 1,258 of the private units to be delivered at genuinely affordable rental and purchase prices. Affordable purchase should be defined as homes available to purchase by households with gross incomes of between €45,000 pa and €75,000 pa equating to sales price including deposit of between €170,000 to €280,000. Affordable rental should be defined on the basis of meeting the cost of providing and maintaining the accommodation over a 30 year period index linked to inflation rather than being based on a portion of market rent.

Sinn Féin's Housing Tenure Proposals (approximate figures):

- 36% of the SDZ housing should be public (social & affordable)
- 25% of the SDZ housing should be social (Council & Approved Housing Bodies)
- 25% of the SDZ housing should be affordable (public & private purchase & rental)

Social Affordable Rent Affordable Sale Ownership
2000 371 371 Public
629 629 Private
2000 1000 1000 Total
(DraftClonSDZ0383, Eoin Ó Broin TD, Cllr Danny O'Brien & Cllr Mark Ward)

Chief Executive's Response

Dwelling Mix

Further to submissions in relation to providing for a sufficient dwellings mix, it is advised that Section 2.1.6 of the Draft Planning Scheme states that the range of dwellings permitted in Clonburris include houses, townhouses, duplex units, maisonettes and apartments. In order to facilitate market flexibility over the lifetime of the Planning Scheme, a detailed breakdown of unit types is not specified.

The densities prescribed for the two urban centres and their contiguous higher density Sub Sectors will more than likely accommodate a mix of apartments, duplexes and maisonettes. Lower density Sub Sectors will largely accommodate houses. Sub sectors within the mid density range will more than likely accommodate a mix of houses, apartments, maisonettes and duplex units.





It is also a stated requirement that the overall dwelling mix in residential schemes should seek to provide for a range of dwelling sizes to support a variety of household sizes. It is within this context that it is a requirement for Design Statements to be submitted for residential developments of 10 dwellings or more and for such statements to address the mix of dwelling sizes within the subject application site, while also addressing the mix of dwelling types within the subject Development Area.

Further to submissions in relation to the provision of housing for older people, Section 2.1.6 of the Draft Planning Scheme encourages the provision of accommodation for students and older people (independent and semi-independent living) within the Kishoge and Clonburris Urban Centres and their contiguous Development Areas that are proximate to (inter alia) public transport services. Further to the provisions of Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2015), this form of accommodation is considered to constitute residential development and not commercial development. Applications for such development will therefore be assessed against the densities prescribed under the Planning Scheme.

Adaptability

Further to submissions seeking the provision of adaptable homes, Section 2.1.6 of the Draft Planning Scheme requires individual dwelling units to be capable of adaptation to meet the changing needs of residents during the course of their lifetime based on the guidance set out under Quality Housing for Sustainable Communities (2007) including the need for later extensions or attic conversions. There is also provision under the Draft Planning Scheme to develop Live Work Units.

Social Housing

Further to submissions in relation to the provision of social housing, housing tenure and affordable housing; it is advised that the Planning and Development Act 2000 (as amended) prescribes the mechanism for delivery of social and affordable housing including the percentage of lands that must be provided for such housing. It is stated that a housing strategy shall provide a specified percentage, not being more than 10 per cent, of the land zoned for residential use, or for a mixture of residential and other uses, shall be reserved for social housing and/or affordable housing. It is also stated that SDZ Planning Schemes shall be consistent with the relevant Housing Strategy for the County. Within this context and in the context that the Affordable Housing Schemes have been stood down under Government Housing Policy, the South Dublin County Council Interim Housing Strategy 2016 sets out a requirement to reserve 10% of lands for social housing.

Section 2.1.6 of the Draft Planning Scheme therefore requires all development to comply with the requirements of Part V of the Planning and Development Act 2000 (as amended) and with the South Dublin County Council Housing Strategy with regard to the provision of Social and Affordable Housing (if further amended). In accordance with Section 168 (4) of the Planning and Development Act 2000 - 2016 (as amended), the following are the stated objectives for the Planning Scheme:

- To apply a 10% social housing requirement, pursuant to Part V of the Planning and Development Act 2000 - 2016 (as amended) to all sites in the Planning Scheme that are solely for residential use, or for a mixture of residential and other uses (save where the development qualifies for a modified or amended obligation or is otherwise exempted);
- To promote social integration and facilitate a diverse range of dwelling tenures within housing developments, including social housing; and
- To ensure an appropriate distribution of new social housing, and to avoid an excessive concentration of social housing.

The Part V requirements of the Draft Planning Scheme are therefore consistent with the South Dublin County Council Interim Housing Strategy 2016 and many of the submissions and queries in





relation to the dispersal and integration of social housing. Any attempt to increase the percentage of required social housing or include an affordable housing requirement would render the Planning Scheme inconsistent with Housing Strategy for the County and would be at variance with the Planning and Development Act 2000 (as amended). It is therefore not possible to increase the 10% requirement. Issues raised in relation to (inter alia) parking cannot affect this requirement. The location of social housing provided under Part V will be identified at planning application stage in accordance with the requirements of the aforementioned legislation.

It is should be noted that the purchase of housing, rental of housing, allocation of government funding and interference with the housing market is outside the control of the SDZ Planning Scheme. Further to the submission in relation to meeting the housing needs of the area and the County, it is advised that this is a function of the Housing Strategy for the County.

Traveller Accommodation

There are two established traveller accommodation sites within the SDZ Lands at Kishoge Park and Lynch's Park. It is a stated intention in the Draft Planning Scheme for existing Traveller Accommodation sites to be integrated into the future development of the lands. The location and provision of new traveller accommodation sites is the function of the South Dublin County Council Traveller Accommodation Programme 2014-2018. The said programme does not identify the SDZ lands for new traveller accommodation. Section 2.1.6 of the Draft Planning Scheme does provide scope, in the longer term, for additional traveller accommodation in the context of any subsequent reviews of the traveller accommodation programme.

Dwelling Design and Standards

Further to the submission on the construction and management of apartments including clothes drying facilities and storage etc., it is advised that this is governed by Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2015). It is within this context Section 2.1.6 of the Draft Planning Scheme requires all apartments to comply with the requirements of said guidelines and the statutory minimum space standards are reiterated.

Further to submissions in relation to the quality of housing design, the provisions of the Draft Planning Scheme in relation to design statements (Section 2.8.2) require for all large scale housing development to demonstrate compliance with the 12 Design criteria contained within the Urban Design Manual a Best Practice Guide (2009). Provisions are also in place (Section 2.8.3 of Planning Scheme) in relation to ensuring high quality external finishes and appearance. It is a requirement under the Draft Planning Scheme for development to be set out in perimeter blocks with enclosed private open space and passive surveillance of corners, streets and spaces. Issues in relation to the energy efficiency, fire escape and access are appropriately dealt with under the Building Regulations and are outside the scope of a Planning Scheme.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.





Section 2.2 Movement and Transport

2.2.1 Introduction/General

- Concerns raised by Lucan Resident in relation to traffic congestion along Griffeen Avenue, Newcastle Road and Ballyowen Road being exacerbated by reason of the absence of bus lanes, planned additional development (including houses and schools) and the cost and reliability of public transport. (<u>DraftClonSDZ0012</u>, <u>Sarah Parlane</u>)
- 2. Submission highlights concerns in relation to the increase in traffic congestion as a result of development at Clonburris and outlines the impact traffic congestion and car journey times are having on children. (DraftClonSDZ0031, Karen Sheehan)
- The area around the Waterside Pub and Station Road can be a real bottle neck for traffic, which will only get worse. Concern is raised as to where new cars can go in the area. (<u>DraftClonSDZ0028</u>, <u>Paul Mulhall</u>)
- Objection to SDZ Planning Scheme from Lucan resident by reason of traffic congestion. (<u>DraftClonSDZ0017</u>, <u>Aimee Looney DraftClonSDZ0033</u>, <u>Nigel McGuirk DraftClonSDZ0036</u>, <u>Paula Regan</u>)
- 5. Objection to SDZ Planning Scheme from Clondalkin resident by reason of traffic congestion. (<u>DraftClonSDZ0020</u>, <u>Liam Doran</u>)
- 6. Traffic in the Lucan area is already past saturation point, this needs to be amended before any new development takes place. (<u>DraftClonSDZ0029</u>, <u>Alan Johnson</u>)
- 7. In the context of Adamstown, added traffic from Clonburris must address new transport before housing. Road network at maximum and new car journeys will push network over any reasonable limit. Submission welcomes the development but objects to the plan due to the traffic management issues being not properly addressed. (DraftClonSDZ0003, Scott greenwood)
- 8. Lucan/North Clondalkin road infrastructure is creaking as it is and this proposed development will make a bad situation much worse. Fonthill road and the outer ring road are packed at the best of times and you want to add thousands of houses into the mix. I strongly object to this development and I hope SDCC see sense and scrap this proposal for a more suitable location (DraftClonSDZ0005, Nicholas Roche)
- The roads in area are already congested and are too small and are not sufficient to take the additional traffic that will be generated by the development. (<u>DraftClonSDZ0036</u>, <u>Paula</u> <u>Regan</u>)
- 10. Submission outlines that the area cannot support additional housing until the traffic management of the greater Lucan area is resolved. The area is at maximum capacity. The plans for Clonburris do not give enough resources and emphasis on traffic management. The submission states that the area needs the Luas to come to West Dublin before this development goes ahead and the area needs additional bus routes and additional buses on the current routes. We also need roads widened, slip roads to main dual carriage ways reopened, zebra crossings to replace some of the traffic lights and the sequences of all lights to work together. (DraftClonSDZ0049, Ruth Beasley)
- 11. Submission from resident of Griffeen Glen outlining the existing high levels of traffic on Griffeen Avenue, Castle Road on the Adamstown outer ring road. Submission outlines the difficulty in travelling by car in the AM peak in the area due to traffic and the increase in travel time experienced. I strongly object to this new development at Clonburris as I don't believe the current traffic in Lucan & Clondalkin has been considered at all. All the major congested routes here already are listed in this Transport section as Primary routes for Clonburris. Before any building is done on Clonburris I would urge planners to review the





- current traffic issues in Clondalkin and Lucan and provide better solutions than are listed here. (DraftClonSDZ0006, Jennifer Byrne)
- 12. Submission strongly objecting to this proposal, it makes no allowances for already established communities in the area. All facilities in the current areas are at capacity, including existing roads. Residents cannot leave Lucan in the morning between 7:30 & 9am, all primary routes listed here are already beyond full. (DraftClonSDZ0007, Jennifer Byrne)
- 13. The roads around the R136 cannot accommodate more cars. (<u>DraftClonSDZ0040</u>, Foxborough Residents Group Lucan, Foxborough Residents Group)
- 14. While new residents will be encouraged to use bikes/trains/bus as a means of transport; families rely on cars. (<u>DraftClonSDZ0040</u>, Foxborough Residents Group Lucan, Foxborough Residents Group)
- 15. Submission outlines that the plan does not appear to mention mode of transport for trip journeys. The plan is car focused and not public transport focused. (<u>DraftClonSDZ0041</u>, <u>Jonathan Kavanagh</u>)
- 16. Concern raised in relation to the use of existing routes i.e. Griffeen Avenue and Griffeen Road that are heavily trafficked at peak times. (DraftClonSDZ0071, Ciara Enright)
- 17. The area is already congested and is incapable of accommodating any more residential development without additional transport services. (DraftClonSDZ0157, Ana Gutierrez)
- 18. Submission from Lucan resident outlines concerns in relation to traffic. Concerns are raised that the development of so many properties along outer ring route will significantly affect journey times in what is already a busy commuter route (DraftClonSDZ0167, Niamh Kilcullen)
- 19. Submission outlines that too much extra traffic will be coming into the area and roads will not be improved. (<u>DraftClonSDZ0201</u>, <u>Mary Haddock</u>)
- 20. Lucan resident highlights concern in relation to traffic congestion, lack of trains, parking and absence of plans for Luas. (<u>DraftClonSDZ0214</u>, <u>Gillian McCarthy</u>)
- 21. The existing road infrastructure is at capacity, and the development of Clonburris will only exacerbate this problem. (<u>DraftClonSDZ0152</u>, <u>Richard Daly</u>)
- 22. The development of Clonburris will add to the existing traffic congestion in the area. (DraftClonSDZ0153, Johanne Ryan)
- 23. Lucan resident raises concerns in relation to potential to exacerbate congestion in Lucan particularly the Griffeen area and concern in relation to the opening of cul-de sacs in Oldbridge. (<u>DraftClonSDZ0281</u>, <u>Pamela Dunne</u>)
- 24. Clondalkin resident highlights concerns in relation to traffic volumes, traffic congestion (particularly along N4 and N7), traffic safety for children, absence of political support for Luas and lack of proposals for additional roads. (<u>DraftClonSDZ0287</u>, <u>Catherine Bennett</u>)
- 25. Submission from CIE agrees with key transport principles of the SDZ Scheme in relation to connecting development, integrating development, maximising route choice, maximising access for different uses and balancing the needs of the car. (DraftClonSDZ0295, Aidan Ruane, CIE Group Property Management DraftClonSDZ0346, Aidan Ruane, CIE Group Property Management)
- 26. There is insufficient road infrastructure to accommodate additional traffic. (DraftClonSDZ0240, Beatriz Martinez)
- 27. There are no upgrades to existing congested roads. (<u>DraftClonSDZ0310</u>, <u>Orla Flanagan</u>)
- 28. There are no transport options. (<u>DraftClonSDZ0310</u>, <u>Orla Flanagan</u>)
- 29. Lucan is already very heavily congested and the proposed development will make it impossible to move around. (<u>DraftClonSDZ0261, Susan Skelly</u>)
- 30. With Adamstown incomplete, and Clonburris still in planning phases, there are no guarantees that adequate public transport will be in place to service the huge population increase between Lucan and Clondalkin. Submission outlines that failure to improve throughout on arterial routes such as Newcastle, Fonthill and Nangor Roads will funnel





traffic through areas like Balgaddy, Hillcrest and Tandy's Lane, while doing nothing for the wellbeing of existing residents. Submission requests a timeline for upgrading vital local thoroughfares in order to deal with the inevitable increase in private traffic. (DraftClonSDZ0271, John Donohue)

- 31. Traffic congestion in the area is getting worse daily, including the Newcastle Road which is at breaking point. Traffic is backed up on all roads leading to and from Lucan at busy times.

 All exits around Lucan onto the N4 are closed, these need to be reopened so cars can access it quicker.
 - Staggered school opening times are needed to alleviate traffic in the Lucan area. (<u>DraftClonSDZ0052</u>, <u>Lynda Curtis</u>)
- 32. The proposed development at Clonburris is going to cause huge transport and infrastructure problems in the Lucan and Palmerstown area. The existing area is already choked with traffic including the Newcastle Road and the N4 to M50 / Palmerstown. As such concern is raised as to how the additional SDZ related traffic will be catered for. (DraftClonSDZ0053, Michael McCabe)
- 33. The road provision is totally based on the existing road network as soon as you are outside the Clonburris area. There are no new roads, the only comment in the proposals is the rather vague notion to upgrade the existing roads to promote walking and cycling and create streets that are more attractive and urban in character. (DraftClonSDZ0272, Andy Lane)
- 34. Submission highlights concern in relation to absence of transport options, absence of road upgrades; absence of community facilities; traffic congestions and impacts on Lucan residents. (DraftClonSDZ0315, Niall Flanagan)
- 35. Lucan resident highlights concerns in relation to construction of new houses without adequate public transport infrastructure, adequate road infrastructure and adequate transport plans. (<u>DraftClonSDZ0318</u>, <u>John Gobbett</u>)
- 36. Adamstown resident highlights concerns that include traffic congestion (between N4 and N7), the proposed street network (number and nature of junctions), flawed transport assumptions and viability of new zero or zero parking developments and flawed transport assumptions in relation to traffic volumes (post 2012).
 - Suggested solutions to transport issues include reducing junctions, a revised street network, increasing public transport options, provision of park and ride facilities, a timeline for the Lucan Luas, upgrading of strategic roads, linking the Celbridge road to Clonburris and staggering the phasing of the Adamstown and Clonburris SDZ. (DraftClonSDZ0319, renata escobar)
- 37. Submission outlines that Lucan is facing chronic traffic congestion with many roads and junctions experiencing significant tailbacks at peak times. This local road network is saturated and cannot accommodate further traffic. Noted that the Transport Assessment & Strategy identifies that up to 17,000 additional car trips may be added to the local road network. This additional traffic cannot be accommodated which is already saturated. (DraftClonSDZ0204, William Lavelle)
- 38. The Draft Planning Scheme focuses on the mobility of the new residents of Clonburris and not their impact on the current road networks. This focus is based on the expectation that new residents will not have cars. (DraftClonSDZ0199, siobhan stoneham)
- 39. The Draft Planning Scheme does not mention a comprehensive road network that would be capable of moving 12,000 cars at full completion and also notes that traffic congestion is already an issue in the area. (DraftClonSDZ0199, siobhan stoneham)
- 40. The proposed development will have a negative impact on the quality of life of the residents through increased traffic congestion. (<u>DraftClonSDZ0391</u>, <u>Richard Daly</u>)
- 41. Submission from Lucan resident outlining that the current version of the plans fails to recognise that the SDZ is located in a highly populated area, choked with congestion, devoid





of adequate infrastructure and transport solutions to support the existing communities. Submission outlines that to rectify the existing traffic issue other roads would need to be included as part of the development. Roads that would lead the traffic away from Lucan would help with this issue. Directing traffic towards the New Nangor Road would help with this. (DraftClonSDZ0410, Karen Dunne)

- 42. Submission outlines that the existing infrastructure outside the Clonburris SDZ does not have the necessary traffic infrastructure and eventually the four areas 'Lucan, Adamstown, Clondalkin and Clonburris' will be using the same major road networks which are already congested. Additional and improved infrastructure is required for these existing communities, including the Luas to Lucan, increased bus networks/rail services and link roads, the Celbridge link road in Adamstown. These should be implemented at the initial stages of the Clonburris SDZ development. (DraftClonSDZ0407, LIONA O'TOOLE)
- 43. Submission outlines that the current traffic setup is a complete nightmare now. The proposal has no real plan on how to help current issues let alone any foresight on how to help additional 16,000 commuters. There is no timeline for the opening of the Kishoge train station and no plans for LUAS stops or a Metro in the future to help traffic issues. The plan lacks complete foresight for any future travel issues. Traffic is only getting worse and there is no concept of trying to future proof traffic. (DraftClonSDZ0404, Brendan Shiels)
- 44. Submission outlines that the Lucan roads are clogged already you cannot possibly add that many additional passenger vehicles along the existing road network. (DraftClonSDZ0402, Anna O'Neill)
- 45. Improvements are needed to the road infrastructure to accommodate 20000 additional cars on already congested roads. These improvements should be carried out before any new houses are built. (<u>DraftClonSDZ0334</u>, <u>Gerard Griffin</u>)
- 46. Submission outlines concerns about the current road network and public transport is under pressure/gridlock in Lucan and it is short-sighted of the Council to expect these new homes to be car free/low car ratio. (DraftClonSDZ0370, Shirley Clarke)
- 47. Lucan resident raises concerns in relation to lack of road infrastructure for increased traffic. (DraftClonSDZ0353, Stephen O' Rafferty)
- 48. Existing traffic gridlock problems should be addressed and a 25% provision should be provided for expansion before Clonburris is built. (<u>DraftClonSDZ0394</u>, <u>Richard Daly</u>)
- No development should take place until adequate road networks are developed in South Lucan to manage the expected population forecast for 2025. (<u>DraftClonSDZ0398, Andrew Carton</u>)
- 50. Traffic and transport is a concern. Parents, staff and students at Lucan East Educate Together primary school are very concerned that traffic in Lucan is already at breaking point and an extra 9,000 houses will bring it to a standstill. (DraftClonSDZ0102, Eddie Fox, Lucan East Educate Together NS)
- 51. Average commuting times are increasing, and the proposed development will add to this time and will impact on the quality of life of residents. (DraftClonSDZ0338, Fiona McCormack)
- 53. Lucan resident highlights concern in relation to quality of life by reason of traffic congestion on roads that surround the SDZ lands, the absence of proposals to upgrade junctions (including junction between Outer Ring Road and Balgaddy Road) and the lack of commitment for DART underground. (DraftClonSDZ0412, Darragh Mac Fiaich)





- 54. Joint submission from local representatives notes proposed junction upgrades but highlights concerns in relation to exacerbation of traffic congestion. It is suggested that there is a need for an additional link road between the N4, N7 and N81 that will serve as an alternative to the Outer Ring Road and M50. (DraftClonSDZ0419, Cllr. Emer Higgins, Cllr. Vicki Casserly & Cllr. Kenneth Egan)
- 55. Opposition is raised on the basis of added traffic to the Griffeen Road and surrounding areas, particularly at school times. (<u>DraftClonSDZ0222</u>, <u>Audrey Clayton</u>)
- 56. The surrounding roads are very busy and cannot accommodate additional traffic resulting from the Clonburris development. (DraftClonSDZ0224, Valerie Mcneill)
- 57. Lucan is already fully congested with traffic, the Clonburris development will only impede this issue. (DraftClonSDZ0227, Stacey Lacken)
- 58. Lucan will be negatively impacted due to additional traffic, which will render the area gridlocked. (DraftClonSDZ0228, Diane O'Connell)
- 59. The proposed rail services will not suit a lot of people who will be forced to use cars, which will put additional stress on the current roads at peak times, including the Fonthill Road, Grangecastle Road and Newcastle Road.
 Additional roads are needed to reduce traffic on the already congested roads in Lucan and Clondalkin. (DraftClonSDZ0229, lisa rodgers)
- 60. There are major traffic issues in Lucan and development at Adamstown is already impacting on traffic on the Newcastle Road. (<u>DraftClonSDZ0251</u>, <u>Amanda O'Sullivan</u>)
- 61. At the moment all local roads are congested at peak times. Certain roads such as the Fonthill Road and the Liffey Valley shopping centre road are also congested on Saturdays and Sundays. The proposed development will lead to further gridlock as the roads cannot take any more traffic. (DraftClonSDZ0260, Andrew Newman)
- 62. Objection is raised due to existing traffic congestion in the area. (<u>DraftClonSDZ0292</u>, <u>Mary Dwyer</u>)
- 63. The Clonburris SDZ does not adequately address traffic management in Lucan and Adamstown and concern is raised over failed transportation in the area. Advanced infrastructural planning of the road network is required in advance of additional houses. The Adamstown SDZ is not complete and there is traffic congestion in the Tandy's Lane area due to construction traffic and the area being used as a rat run. (DraftClonSDZ0293, John Byrne)
- 64. Infrastructure and public transport is vital for business, the Draft Planning Scheme will have a negative impact on existing business including Grange Castle business park by way of lack of adequate public transport, existing journey times and existing and predicted traffic congestion. (DraftClonSDZ0236, ISO Solutions Ireland, ISO Solutions Ireland)
- 65. Submission outlines that an over reliance of the scheme on the existing public transport services will impact adversely on both the scheme and on the existing population.

 (DraftClonSDZ0502, Ed O'Brien & John Curran TD, Fianna Fail Dublin Mid West)
- 66. Submission from resident of Clondalkin regarding impact of the proposal on the existing traffic, in particular Fonthill Road. (<u>DraftClonSDZ0501</u>, <u>Nichola Flynn</u>)
- 67. The traffic projections for 2035 are based on the existence of Lucan Luas, the DART extension to Hazelhatch, the DART underground and improved bus services. There is no guarantee however that these services will be in existence by then and without these, the use of private cars will be significantly higher than projected. (DraftClonSDZ0308, Madeleine Johansson, People Before Profit)
- 68. Existing traffic congestion on the Fonthill Road and Ninth Lock Road must be taken into consideration before more houses are built (DraftClonSDZ0498, Cllr Breeda Bonner)
- 69. Serious concerns in relation to the impact of new residents on traffic congestion on key roads (M50, N4, N7 and Outer Ring Road). Concern is also raised that there is no plans to

Clonburris



- deal with this significant increase in traffic and movements. (<u>DraftClonSDZ0504, South Dublin County PPN</u>, South Dublin County Public Participation Network)
- 70. The Clondalkin area is very congested and the infrastructure is inadequate and would not be able to cope. (<u>DraftClonSDZ0492</u>, <u>Jim Milton</u>)
- 71. The road network surrounding the development is not sufficient to cope with the increased traffic either during construction or operation. It is stated that there are too many junctions proposed on the Ninth Local Road and this will significantly increase journey times.

 (DraftClonSDZ0505, Paula Kelly)
- 72. Concerns that there is no plan to deal with the 12000 cars that will be generated by the SDZ, other than to hope the Clonburris population will cycle, walk or get a bus or train.

 (<u>DraftClonSDZ0537</u>, <u>John Vaughan DraftClonSDZ0536</u>, <u>Michael Jennings DraftClonSDZ0531</u>, <u>Adrienne O'Driscoll DraftClonSDZ0532</u>, <u>Ciaran O'Driscoll DraftClonSDZ0530</u>, <u>Kay Vaughan DraftClonSDZ0533</u>, <u>Marie Tweedy DraftClonSDZ0534</u>, Shay Keogh)
- 73. The submission states that the road system (R120, Outer Ring Road & Fonthill Road) need to be upgraded. (<u>DraftClonSDZ0536</u>, <u>Michael Jennings</u> <u>DraftClonSDZ0531</u>, <u>Adrienne O'Driscoll</u> <u>DraftClonSDZ0532</u>, Ciaran O'Driscoll)
- 74. Existing roads are extremely busy and submission questions where the extra traffic will go. (DraftClonSDZ0560, Sandra McLoughlin DraftClonSDZ0561, Tara Jenkins DraftClonSDZ0562, John McLoughlin DraftClonSDZ0563, Tracey Boland DraftClonSDZ0602, Catherine Scanlon DraftClonSDZ0603, Vincent Scanlon)
- 75. Submission from resident of Ashwood objecting to building of Clonburris SDZ as traffic in the area is already at capacity and cannot deal with 21,000 people added. (Deirdre Madden)
- 76. It should not be assumed that 8,000 new homes will only contribute 12,000 vehicles onto the local road network. The existing road network cannot cope with current traffic levels, as such how can additional car journeys be accommodated.
 The Adamstown SDZ should be completed first and improvement to the local road network is needed before starting on the Clonburris SDZ.
 (DraftClonSDZ0387, Owen Meade)
- 77. Adamstown and Lucan are already overpopulated with minimal transport facilities, there are severe traffic disruptions on a day-to-day basis. The development of the Clonburris SDZ will disrupt local people in a negative way. (<u>DraftClonSDZ0388</u>, <u>Siby Joseph</u>)
- 78. The development will cause severe traffic congestion on the N4, R120, Ninth Lock Road, R123 Grange Road and the R113 Fonthill Road. There will be an additional 10,000 cars accessing the N4 and within twenty years 20,000 additional cars, including additional education traffic journeys. The greatest impact will be on the N4, Palmerstown, Lucan, Celbridge and Maynooth. The two sets of traffic lights at Palmerstown and Stewart's Hospital are already causing major tailbacks, morning and evening. There are no new roads accessing the Clonburris development. (DraftClonSDZ0513, Brian Nolan)
- 79. The Draft Planning Scheme lacks detail on how the problem of nearly 10,000 more cars on already congested roads, will be dealt with. (<u>DraftClonSDZ0386, Kinga Drozdz</u>)
- 80. Lucan resident indicates that issues of traffic congestion in Lucan and on Newcastle Road, N4 and surrounds should first be addressed before proceeding with Planning Scheme. Suggested solutions include provision of public transport infrastructure to serve Lucan, Liffey Valley, Adamstown and beyond including areas of Dublin City. (<u>DraftClonSDZ0178, glenn roche</u>)
- 81. Submission expresses concerns about the development of Clonburris. Lucan as it stands has a serious traffic management issue particularly during the school term. (DraftClonSDZ0348, Emma Carolan)





82. The proposed Celbridge Link Road from Adamstown should be upgraded and linked into Clonburris and this should be a dual carriageway. (<u>DraftClonSDZ0536</u>, <u>Michael Jennings DraftClonSDZ0531</u>, <u>Adrienne O'Driscoll DraftClonSDZ0532</u>, <u>Ciaran O'Driscoll</u>)

Chief Executive's Response

Optimal Location of SDZ Lands

The SDZ lands are uniquely positioned within the Metropolitan Area of Dublin to benefit from a wide range of existing and planned transport opportunities offered by the Kildare/Cork Railway Line, the Grand Canal and an existing network of national, regional and local roads that are served by existing bus lanes and planned Core Bus Corridors, as well as existing local bus routes.

This makes the subject SDZ lands strategically important at a Regional and County level in terms of their accessibility and potential to integrate land use and transport planning in a manner that promotes sustainable forms of development with reduced car dependency thus helping to address many of the concerns raised in submissions in relation to avoiding development that exacerbates traffic congestion. Within this context, it is considered that the unique positioning and transport opportunities presented by the subject SDZ is of significant value.

Existing Transport Opportunities

Further to the concerns raised in submissions in relation to the adequacy/absence of existing and planned transport infrastructure and existing traffic congestion, it should be noted that the subject SDZ lands are an optimal location for sustainable development by reason that the lands are already served by an existing network of strategic orbital and radial roads (R120, R136, R113, L1058, L1059), by a strategic cross metropolitan railway corridor (Kildare/Cork Railway Line) and by an uninterrupted pedestrian and cycle route into Dublin City (Grand Canal Greenway). Bus lanes are also in place to serve the SDZ lands along Grange Castle Road (R136), Fonthill Road North (R113), Adamstown Avenue (L1058) and Thomas Omer Way (L1059).

This creates a rare opportunity to create a Draft Planning Scheme that connects with, capitalises on and augments an existing networks of strategic road, rail, bicycle and walking routes. Sustainable modal splits with a choice of transport options and reduced car dependency can therefore be achieved on the SDZ lands that would be difficult to achieve elsewhere within the County and Region. Therefore, the impact of developing the SDZ lands on traffic congestion, compared to other areas within the County and Region, will be minimal (less than 1% contribution to strategic road network - see Transport Assessment and Strategy below).

Planned Transport Opportunities

Further to concerns raised in submissions in relation to committing to the planned public transport proposals, a submission from the NTA on the Draft Planning Scheme confirms that the NTA is committed to deliver the level of public transport infrastructure required to serve Clonburris including transport proposals that forms part of the Transport Strategy element of the Transport Assessment and Strategy that accompanies the Planning Scheme such as the DART Underground and Core Bus Network proposals. These planned projects will connect the SDZ lands, including existing public transport services and infrastructure into an integrated cross metropolitan network of orbital and radial routes.

Further submissions raising concerns in relation to an absence of transport opportunities in general, the SDZ lands will be served (both directly and indirectly) by additional high quality public transport infrastructure projects planned under the NTA's Transport Strategy for the Greater Dublin Area 2016 – 2035. These projects include the DART Expansion Programme, the Lucan Luas, the Tallaght – Blanchardstown Core Orbital Bus Route and other Core Radial Bus Routes. The planned radial and





orbital bus routes have been modelled to serve Clonburris trip demands as part of the Transport Assessment and Strategy that accompanies the Draft Planning Scheme. A new N4/N7 link road (Western Dublin Orbital Route) has also been factored into the wider modelling of the Draft Planning

Scheme and the South Dublin County Council Development Plan 2016 – 2022 provides for this regional road as a Medium to Long Term Road Objective.

The combination of existing and planned transport opportunities will greatly expand the route and mode choice for public transport users including residents and employees in Clonburris. This has enabled the creation of a Draft Planning Scheme that will achieve the following:

- Promote choice of transport modes including heavy rail, light rail, car, walking and cycling.
- Provide the opportunity to interchange between the different modes of transport;
- Maximise the choice of orbital and radial public routes across the metropolitan area of Dublin;
- Reduces demand for longer trips to work, school, employment and retail etc.
- Reduces reliance on the car as the primary means of transport; and
- Reduces the impact of the proposed development on the wider regional and national road network.

In summary, the Draft Planning Scheme proposes to maximises route choice and maximise access for different modes of transport while balancing the needs of the car in a manner that will provide choice for existing and future residents and employees while reducing reliance on the car. This further addresses concerns raised in submissions received in relation to improving transport options and addressing traffic congestion.

Serving Clonburris' Trip Demands

Opening of the second railway station on the SDZ lands (Kishoge Railway Station) is subject to Phase 1 of the Draft Planning Scheme, however, this is a minimum provision and the station could be opened prior to or earlier than Phase 1. Issues in relation to the phasing of other transport infrastructure are dealt with under the Chapter 4 (Phasing) summaries and responses below. Further to suggestions in relation to linking the SDZ Planning Scheme to wider transport issues, while the Lucan Luas and medium to long term roads proposals included in the South Dublin County Council Development Plan 2016 – 2022 such as the Western Dublin Orbital Route and Celbridge Link Road have been tested as part of the wider strategic analysis under the Transport Assessment, the Tallaght – Blanchardstown Core Orbital Bus Route (along with additional bus routes), the DART Expansion Programme, the internal street network and local junction upgrades have been modelled to service the trip demands generated by Clonburris in line with the programme set out under the Transport Strategy for the GDA. The development of the SDZ lands is therefore not considered to be reliant on all aspects of the GDA Transport Strategy such as the Lucan Luas or the medium to long term road proposals contained in to the County Development Plan.

Planned Street Network and Upgrades

Further to the provisions of the Draft Planning Scheme to maximise the use of more sustainable modes of transport, the Draft Planning Scheme seeks to capitalise on and connect with the existing strategic regional and local road network while upgrading existing streets including junctions.

Further to concerns raised in submissions in relation to the absence of road proposals, road upgrades and a need for road widening; a comprehensive street network has been designed for the SDZ lands and incorporated into the Draft Planning Scheme (see Figure 2.2.1 of the Draft Planning Scheme). The planned network will connect existing strategic roads that serve the SDZ lands while providing route choice within the SDZ lands thus helping to dissipate traffic. This permeable street network has been designed in accordance with the Design Manual for Urban Roads and Streets





(DMURS) and consists of a hierarchy of streets with differing designs and functions in terms of carriageway widths, junctions, traffic speeds and traffic volumes. Further to concerns raised in submission in relation to provision for existing communities, the planned street network provides opportunity to connect surrounding residential areas to existing and planned public transport infrastructure and walking and cycling routes on the SDZ lands.

The planned integrated street network will promote route choice and transfer to more sustainable modes of transport including public transport, walking and cycling. Open ended streets at the higher end of the hierarchy will provide corridors for radial and orbital bus routes that are planned to serve the SDZ lands.

In the interest of connectivity, place-making and the provision of safe and attractive routes for different modes of transport; it is proposed to upgrade existing strategic roads as urban streets with signalised junctions, double planting, transition zones, on-street parking and frontage from development. Street and junction upgrades are provided for under Phase 2 of the Draft Planning Scheme, however, it is advised that this is a minimum requirement and such upgrades can be provided prior to Phase 2. A number of key junction improvements and new junctions/connections through and along the strategic/Arterial Streets are also proposed to improve connectivity and promote a street network that is more urban in character. Junction improvements are identified and detailed under the Transport Assessment and Strategy (Chapter 7) that accompanies the Planning Scheme and Figure 2.2.7 (Overall Movement Concept) of the Planning Scheme. Cross sections and plans for the upgrade of existing strategic streets and the design of local streets have also been included under Section 2.2.4 of the Draft Planning Scheme. Permission to realign and upgrade the Newcastle/Adamstown/Lock Road (R120) has already gone through the PART 8 process and its design and completion has been incorporated into the Draft Planning Scheme including its phasing programme.

Suggestions to widen existing roads would be at variance with DMURS in terms of integrating pedestrian and cyclist movement and would also be at variances with the key principles of the Draft Planning Scheme in terms of place making particularly in relation to the creation of attractive urban centres. Research carried out under "Strategic Development Zones: The Benefits of Integrated Land Use and Transport Planning" (NTA, 2017) also suggests that when additional road capacity is provided in areas with growing traffic levels, this capacity tends to be taken up quite quickly with traffic congestion. The widening of roads in areas such as the SDZ lands can therefore represent an inefficient use of public resources, particularly in the Greater Dublin Area where there are excessive costs associated with acquiring land.

Car Parking

Further to concerns raised in submissions in relation to the quantum of parking proposed, the Draft Planning Scheme seeks to minimise the number of car spaces and maximise their use within the SDZ lands in order to promote sustainable travel patterns. The maximum car parking standards for the key land uses in Clonburris are consistent with those set out under the South Dublin County Council Development Plan 2016 –2022. This forms part of the multi-faceted approach under the Draft Planning Scheme to reduce car dependency and promote a shift to more sustainable modes of transport and address issues such as traffic congestion, which has been raised as an issue in many submissions. Under Section 2.2.6 of the Draft Planning Scheme, near zero or zero parking provision is only promoted in the higher density areas of the SDZ lands adjacent to Public Transport interchanges and within the urban centres planned around the Clondalkin-Fonthill and Kishoge rail stations. Such development is also subject to a number of stipulations including demonstration that car parking can be shared between complementary land uses including Park and Ride Facilities.





Transport Assessment and Strategy

The transport assessment methodology and traffic modelling that has been undertaken as part of the Transport Assessment and Strategy that accompanies the Draft Planning Scheme, complies with national standards. The National Transport Authority's (NTA) Regional Modelling System is the most sophisticated modelling tool available for assessing complex multi modal movements within the urban context. This provides a consistent framework for transport assessment.

As stated under Section 2.2.1 of the Draft Planning Scheme, the NTA Eastern Regional Model (ERM) has been used to assess the traffic and transport impacts of the Draft Clonburris SDZ and its proposed transport strategy. A local junction model has been developed to test the local impacts of the proposed SDZ. The model represents all types of trips and transport movements, for example, for work trips, school trips and leisure trips throughout the day and therefore assesses all aspects of the demand for travel arising from Clonburris and the surrounding communities.

The ERM has factored in the wider transport impacts from existing and planned development within the Eastern Region including the Liffey Valley Shopping, Grange Castle Business Park and Adamstown.

Further to the concerns highlighted in submissions received in terms of modal split and impact on traffic congestion, contribution flows from Clonburris have been modelled on surrounding roads including the Fonthill Road, Grange Castle Road, Thomas Omer Way and Adamstown Avenue. The following are some of the primary conclusions of the Transport Assessment and Transport Strategy in relation to a modelled horizon year of 2035:

- Approx. 75% of residents will be able to access a bus stop within 400 metres and a train station within 800 metres walking distance;
- Approx. 54% of trips in the AM peak (7 AM 10 AM) will be undertaken by walking, cycling and public transport;
- Approx. 56% of trips originating in Clonburris will be less than 4km in length;
- Approx. 27% of trips which originate in Clonburris will stay within the SDZ lands;
- A large proportion (30%) of public transport trips which originate in Clonburris will be destined for Dublin City Centre;
- Planned orbital routes will result in a mode share of 45% for the Tallaght Sector and 42% in the North West Sector of Dublin City for public transport;
- Clonburris will generate approximately 1,700 passenger car units on the wider road network in the AM peak hour (08:00 0:900);
- Approx. 72% of car trips generated by Clonburris in the AM peak period are forecast to stay within the area bound by the N4, N7 and M50;
- Traffic generated by Clonburris will contribute to less than 1% of the overall traffic on the strategic road network in the AM peak period;
- Areas within the N4/N7/M50 boundary will experience congestion and delay in 2035 irrespective of whether Clonburris is developed;

Further to the above, the majority of identified junctions in the vicinity of Clonburris will operate satisfactorily in peak periods (AM, Lunch Time, School Run and PM). Also, a comparison with an alternative 'redistributed' scenario where the projected development for Clonburris is redistributed to other areas within the County and North Kildare indicates that the Draft Planning Scheme performs better in terms of the performance of the strategic street network by reason of (inter alia) the sustainable modal split that can be achieved on the SDZ lands.





The primary conclusion of the Transport Assessment and Strategy states that Clonburris is one of the most optimal locations for large scale development in the state due to the availability of high-frequency and high capacity public transport infrastructure as well as walking and cycling.

Chief Executives Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.

2.2.2 Public Transport Accessibility

- 1. Lucan resident requests that feeder bus services be provided from the wider Lucan area into Kishoge and Fonthill railway stations. (<u>DraftClonSDZ0014</u>, <u>Adam Sebestyen</u>)
- 2. The area is already quite poorly served by public transport. There is one infrequent bus to Tallaght and one to Blanchardstown. If journeys are not to city centre it is difficult to move around.
 - The train is not used due to price and location.
 - The LUAS is only accessible to one area of Clondalkin.
 - Concern is raised over the provision of Lucan LUAS and the disruption that would result in an existing over-populated area, if this project went ahead. (<u>DraftClonSDZ0028</u>, <u>Paul Mulhall</u>)
- 3. Submission questions the extra bus lane to be added as there is not enough buses serving the area to begin with so the addition of a bus lane is quite frankly laughable. (DraftClonSDZ0002, Kellie Curran)
- 4. (DraftClonSDZ0036, Paula Regan)
- 5. The reliance on public transport into the city is unrealistic. People work in areas other than the city centre and will have to use their cars. (<u>DraftClonSDZ0038</u>, <u>Darren Kenny</u>)
- 6. Public transport links in the local areas need to be improved and need to be more efficient. (DraftClonSDZ0038, Darren Kenny)
- 7. There are no concrete plans with regard to new bus services for the area, new road network, and no immediate plans to open the Kishogue rail station. The Lucan LUAS campaign is also no-longer part of Government plans. (<u>DraftClonSDZ0051</u>, <u>Brendan Keenan</u>)
- 8. Submission from resident of Griffeen Glen outlining that there is inadequate public transport to service this area, including an unopened train station and no bus service from Lucan to Tallaght despite the bus lanes all the way. Bus Lanes are in place, but there are no buses. Both Kishogue and Clondalkin Train Stations are unopened, yet are listed as main public transport routes for Clonburris, so when will they be opening. There is no mention of Orbital routes in this plan either, so will people only travel to the City Centre and back daily, much of the traffic around Lucan/Clondalkin is heading for Park West, City West, Tallaght, Ballyfermot, Blanchardstown and Kildare (Leixlip/Celbridge and Maynooth), there is no consideration in this plan for this type of travel.

 (DraftClonSDZ0006, Jennifer Byrne)
- 9. Submission strongly object to this proposal, it makes no allowances for already established communities in the area. Public transport is non existent and cannot wait for first 10k new people to move in for train stations etc. to be open need to be operational beforehand. (DraftClonSDZ0007, Jennifer Byrne)
- 10. It is not acceptable that new residents will have to rely on an over stretched bus service. (DraftClonSDZ0040, Foxborough Residents Group Lucan, Foxborough Residents Group)
- 11. The road infrastructure cannot cope with more buses. (<u>DraftClonSDZ0040</u>, <u>Foxborough</u> Residents Group Lucan, Foxborough Residents Group)
- 12. Submission outlines that the following measure should be considered:
 - Leave space for a mini Luas to travel from one end of area to other
 - Dedicate a local bus and local bus lane for circulation through area. Bus should be independent of Dublin bus and align to Luas, train and school times.





- Additional roads should be included with right and left turns so traffic can move swiftly. Extra lane needed on current primary roads.
- Traffic cameras to be included
- Avoid roundabouts.

(DraftClonSDZ0041, Jonathan Kavanagh)

- 13. No additional public transport is proposed and the existing services is not sufficient. (DraftClonSDZ0071, Ciara Enright)
- 14. The train service is a good thing but the limited service and the fact it stops at Heuston station is a nonsense and should be extended to give the people of this area a reliable service into town. (DraftClonSDZ0084, Corey Sammon)
- 15. In relation to amenities, submission outlines that there is no extra provision for opening of train stations at Kishogue and Clondalkin, Lucan Luas and Park and Ride facilities. (DraftClonSDZ0043, Jeanine Nolan)
- 16. There are inadequate public transport links in this part of Dublin and those that do exist are focused on going in and out of the city. For parents who need to work and deliver and collect children to school and crèche the car is the only option. Serious consideration needs to be given to infrastructure and the locations of schools and crèches in the area. (DraftClonSDZ0167, Niamh Kilcullen)
- 17. Submission from NTA advises that the SDZ lands are the optimal location for residential development by reason of their location on an existing commuter rail line to Dublin City and by reason of their potential to reap the benefits from rail investment, high frequency radial and orbital bus services and active modes of transport (walking and cycling). It is concluded that the development of Clonburris represents a critical factor in meeting Dublin's acute housing needs and a sustainable means of redressing imbalances caused by car based development. (DraftClonSDZ0188, David Clements, National Transport Authority)
- 18. Submission from CIE advises that Government funding and support is being sought to deliver the DART Expansion Programme, which will provide improved frequency, capacity and quality of rail services to passengers originating within the SDZ Lands. It is advised that GDA Transport Strategy indicates that the full DART Expansion programme will be delivered by 2035. (DraftClonSDZ0295, Aidan Ruane, CIE Group Property Management

 DraftClonSDZ0346, Aidan Ruane, CIE Group Property Management)
- 19. Submission from CIE advises that detailed discussions will be required between CIE and SDCC with regard to amendment to development permitted under the Kildare Route Project Railway Order and the incorporation of Park and Ride sites at Clondalkin-Fonthill and Kishoge. It is submitted that a maximum permissible parking allocation will be sought at each station in the context of accessibility to the N4 and N7 and the opportunity to provide a significant Park and Ride facilities for expanded railway services. It is also advised that detailed discussions will be required between CIE and various stakeholders including the NTA with regard to the opening/phasing of Kishoge station and details in relation to transport interchanges between rail, bus, cyclist and pedestrian users. (DraftClonSDZ0295, Aidan Ruane, CIE Group Property Management DraftClonSDZ0346, Aidan Ruane, CIE Group Property Management)
- 20. Dart: There is no Dart anywhere near Clonburris. Commuter Rail: Kildare Route Project is not fit for purpose. It is not electrified, the interconnector to St Stephen's Green/Connolly has not been built (<u>DraftClonSDZ0272</u>, <u>Andy Lane</u>)
- 21. Reliable transport links to the city, schools and workplaces are needed. The new development will put an impossible strain on already overused bus services and cause mass disruption every day. Transport needs to be addressed before any new housing is built. A LUAS to Lucan is essential at this point and must be prioritised now. (DraftClonSDZ0055, Ellen Ward)





- 22. Submission outlines concerns with the level of Dublin bus services that will be available, these services are already overcrowded and it is difficult to get on a 25a or 25b at the Pennyhill bus stop. (<u>DraftClonSDZ0406</u>, <u>Bernadette Doyle</u>)
- 23. Submission outlines that transports connecting the area to Liffey valley, the square, balleyfermot, Tallaght, Maynooth are required (DraftClonSDZ0275, Rachel Kavanagh)
- 24. The Luas to Lucan should be prioritised and commitment should be given from Government including clear timeframes for the delivery of the Luas to Lucan in order to support transport infrastructure for this development prior to commencement of development on the lands. (DraftClonSDZ0269, Shane Roche)
- 25. Open the Clonburris train station to give alternatives to residents of Lucan to access the City Centre with a fast rail service to Heuston and Connolly stations with fewer stops at rush hour times. (<u>DraftClonSDZ0269</u>, <u>Shane Roche</u>)
- 26. The bus lanes on R136, between Balgaddy junction and Castle Road, are underutilised. Adequate planning, with Dublin Bus or private operators, of a new route to town, using these bus lanes and avoiding the Griffeen and Foxborough routes would speed up bus journeys to the City Centre. (DraftClonSDZ0269, Shane Roche)
- 27. There are no options for people who work along the M50 other than to travel by car as a result of the existing poor provision of Public Transport in Lucan (<u>DraftClonSDZ0334, Gerard Griffin</u>)
- 28. Submission questions the transport proposals including the Luas plans and bus plans to support the commuting population of Clonburris. Transport plans are too vague. (DraftClonSDZ0370, Shirley Clarke)
- 29. No development shall take place until public transport infrastructure is developed in South Lucan to manage the expected population forecast for 2025. (DraftClonSDZ0398, Andrew Carton)
- 30. Dublin Bus welcomes the objectives around appropriate bus priority measures within the scheme. (<u>DraftClonSDZ0336</u>, Ray Donnellan, <u>Dublin Bus</u>)
- 31. Dublin Bus are available to discuss or review proposals at any stage, but feel it is important to be able to review the detail design proposals at the appropriate time. (DraftClonSDZ0336, Ray Donnellan, Dublin Bus)
- 32. The Dart underground is seen as vital to the viability of the development which would give commuters a credible alternative to using their cars. (<u>DraftClonSDZ0102</u>, <u>Eddie Fox</u>, <u>Lucan East Educate Together NS</u>)
- 33. Concern is raised about third level students going to colleges across the city and poor transport links. (DraftClonSDZ0102, Eddie Fox, Lucan East Educate Together NS)
- 34. There are two train stations on the lands however these are only useful to those working on or near the railway network, for those who do not, the car is the preferred mode. (DraftClonSDZ0338, Fiona McCormack)
- 35. Submission from Lucan Resident highlights concerns in relation to traffic congestion and the absence of public transport between Lucan and Clonburris. It is advised that trains will provide for radial trips to Dublin City but nor orbital trips between Clondalkin, Lucan and Tallaght. It is requested that bus services use the Outer Ring Road. (DraftClonSDZ0372, Patrick Comerford)
- 36. Lucan resident suggests that in order to deal with traffic management issues, solutions need to include short bus routes that serves schools, train stations and the general surrounding area. It is also suggested that all road/transport proposals be in before more than 25% of houses are built. Concern is raised in relation to current bus lanes not being used and the absence of a bus route between Tallaght, Lucan and Clondalkin. With reference to Metro West, the timing of the Lucan Luas is queried. (DraftClonSDZ0374, Sarah Comerford)
- 37. Submission outlines that a number of key infrastructural projects are included in the NTA Transport Strategy for the Greater Dublin area 2016-2035 and the implementation of this





strategy is vital to the success of this SDZ. It is vital that the Council and the NTA ensure that this strategy is delivered as a matter of immediate priority. Specific timelines for the rollout of these key projects should also be provided, where possible. (<u>DraftClonSDZ0368, Frances Fitzgerald TD</u>)

- 38. Submission raises concerns in relation to traffic and public transport issues. Ensuring residents have ease of access locally, to the city centre and to the Greater Dublin area for both social and employment reasons is central to the success of this SDZ. (DraftClonSDZ0368, Frances Fitzgerald TD)
- 39. The existing Dublin Bus service takes one hour to travel to O'Connell bridge.

 Before any additional houses are built, the pre-existing traffic issues need to be addressed in terms of additional public transport such as DART or Lucan LUAS.

 For residents of the area owning a car is a necessity, unless place of employment is in the city centre. For local residents working in Citywest, using public transport requires getting a bus into the city centre and another to Citywest which can result in a two to three hour bus journey in each direction.

 (DraftClonSDZ0187, Stephen Scallan)
- 40. Public transport currently serves very limited routes and those who work or study outside of these routes will continue to use cars. The transport proposals and road plans are not in any way sufficient to meet the diverse transport links required, in this already chronic traffic congestion zone. (<u>DraftClonSDZ0221, Elaine Hurley</u>)
- 41. Public transport is already fully congested in Lucan, the Clonburris development will only impede this issue. (DraftClonSDZ0227, Stacey Lacken)
- Additional buses are needed in the Lucan area, as existing bus services are not frequent enough. Bus lanes direct to the city centre and other locations are required. (<u>DraftClonSDZ0229</u>, <u>lisa rodgers</u>)
- 43. The Kishogue rail station has been lying idle since it was built nine years ago, it should open before any development takes place.

 A firm commitment and timeframe for expanding LUAS to serve Clondalkin, Clonburris and Lucan must be sought before any building takes place at Clonburris. (<a href="https://doi.org/10.1081/JPT.1081/J
- 44. The following quote from the Greater Dublin Area Transport Strategy 2016-2035 must be taken seriously for the sake of existing communities and of future ones:

 'Development within the existing urban footprint of the Metropolitan Area will be consolidated to achieve a more compact urban form, allowing for the accommodation of a greater population than at present, with much-enhanced public transport system, with the expansion of the built up areas providing for well-designed urban environments linked to high quality public transport networks, enhancing the quality of life for residents and workers alike.'
 - (DraftClonSDZ0399, Guss O'Connell)
- 45. The railway line will only benefit those living close to it. The railway line only services the city centre and not across or around the city, there should be proposals to get to and around other parts of the city. (DraftClonSDZ0251, Amanda O'Sullivan)
- 46. Queries whether there will be commitment given from Dublin Bus and Irish Rail in relation to additional services. (<u>DraftClonSDZ0304</u>, <u>PAULINE KEOGH</u>)
- 47. The development needs its own bus services and not to be serviced by bus services in the local area. (<u>DraftClonSDZ0258</u>, <u>Robert McNeill</u>)
- 48. The proposed rail line will not be able to cater for the new population as the train frequency is very poor and people will have a long walk to get to the train station. (<u>DraftClonSDZ0260</u>, <u>Andrew Newman</u>)
- 49. There is much reference to permeability in the Draft Planning Scheme based on access through existing housing estates. The submission queries where the 'buy in' for people living





in these estates i.e. in terms of being able to access a train station in return. There is existing demand for the Kishoge Station to be opened and this would also convince neighbouring communities that Clonburris is as much for them as it is for the new community living there. (DraftClonSDZ0332, Paul Gogarty DraftClonSDZ0308, Madeleine Johansson, People Before Profit)

- 50. Reference to Health Ireland: A Framework for Improved Health and Wellbeing 2013-2025 and it is noted that it is a key aim of the scheme to encourage accessibility to and the use of public transport. (DraftClonSDZ0234, Fiona Byrne, HSE Environmental Health)
- 51. The new and expanded public transport proposals however will be nothing more than a 'wish list' as it is the responsibility of the NTA to provide these services. These services will only be provided where there is a demand for these regardless of the needs of the community. People Before Profit strongly urge a more holistic approach that integrates transport, construction, amenities and services into an overall coherent plan. (DraftClonSDZ0308, Madeleine Johansson, People Before Profit)
- 52. Lucan Luas needs to be approved and planned immediately by the Government. (DraftClonSDZ0308, Madeleine Johansson, People Before Profit)
- 53. New bus routes and increased services and frequency on existing routes are needed immediately to offer a viable alternative to car journey's across urban areas. (DraftClonSDZ0308, Madeleine Johansson, People Before Profit)
- 54. The submission refers to public transport and in particular train services which should be increased to offer a viable alternative to the car and to offer more convenient options for travelling to Dublin City Centre. The submission recommends great number of services through the Phoenix Park Tunnel and prioritisation of the Dart expansion to Hazelhatch. (DraftClonSDZ0308, Madeleine Johansson, People Before Profit)
- 55. The Eastern and Midland Regional Assembly submission states that the Greater Dublin Area Transport Strategy 2016-2035 is consistent at a policy level with the Regional Planning Guidelines for the Greater Dublin Area (GDA) 2010-2022 at a policy level. It is noted that the NTA Transport Strategy proposes strategic transport investments for the GDA including the extension of DART services to Hazelhatch on the Kildare line, which will support the promotion of higher densities around public transport corridors. The Planning Scheme is generally consistent with the Regional Planning Guidelines, which support the enhancement of the strategic transport infrastructure including the integration of smarter travel options such as public transport, walking and cycling. (DraftClonSDZ0296, malachy bradley, Eastern and Midland Regional Assembly)
- 56. Area has poor orbital connections and needs a bus service to link Tallaght, Clondalkin and Lucan. Plan needs more definite commitments to public transport improvements. (DraftClonSDZ0498, Cllr Breeda Bonner)
- 57. Rail station at Kishoge needs to be opened immediately. (<u>DraftClonSDZ0498, Cllr Breeda Bonner</u>)
- 58. The proximity of the lands to bus and rail links is welcomed however concern is raised due to the limited transport services and the lack of control in the provision of these services. (<u>DraftClonSDZ0504</u>, <u>South Dublin County PPN</u>, <u>South Dublin County Public Participation Network</u>)
- 59. There is no advantage to living within 500m of a bus stop if there are no suitable buses serving that stop. There needs to be more services facilitating movement within the County to Tallaght, Liffey Valley and Clondalkin. (<u>DraftClonSDZ0505</u>, <u>Paula Kelly</u>)
- 60. Submission concerned that there is no guaranteed commitment to Luas to Lucan or the Dart to Hazelhatch (<u>DraftClonSDZ0559</u>, <u>Brian McKenna</u> <u>DraftClonSDZ0565</u>, <u>Jennifer McKenna</u>)
- 61. Submission outlines that the no.13 bus does not operate well and is not a high frequency service. (<u>DraftClonSDZ0606, Sandra Scully</u>)

Clonburris



- 62. Concerns regarding public transport as no public transport links to Tallaght, Liffey Valley.

 Metro West must be in place before any development. (DraftClonSDZ0606, Sandra Scully)
- 63. The Draft Planning Scheme does not outline specific increased Dublin Bus facilities. There should be direct input from the Minister for Transport, Tourism and Sport, Dublin Bus and larnrod Eireann. (<u>DraftClonSDZ0513</u>, <u>Brian Nolan</u>)
- 64. There are no lands set aside for the Lucan LUAS, this is a serious omission to the plans. There is a need for additional bus lanes through the SDZ lands and the existing perimeters. At present there is only one bus lane going in a north / south direction on the Fonthill Road. There is a need for a dedicated bus lane and service between the two rail stations at Clonburris.
 - (DraftClonSDZ0515, Christopher Conway)
- 65. Insufficient public transport links are proposed as part of the development, including links to Tallaght, Liffey Valley.
 The Metro West should be in place before any development takes place. (<u>DraftClonSDZ0514</u>, <u>The Tracey Family</u>)
- 66. Sinn Fein submission states that there is a need for a more ambitious public transport policy fully integrated into the SDZ proposal, setting out clear time lines for the provision of additional bus services and routes, opening and servicing of existing train stations (i.e. earlier phasing of opening of Kishogue Station), future plans for the LUAS to Lucan and Dart to Hazelhatch. (DraftClonSDZ0383, Eoin Ó Broin TD, Cllr Danny O'Brien & Cllr Mark Ward)
- 67. The Draft Planning Scheme does not address the significant increase of people reliant on the already overcrowded public transport system. (<u>DraftClonSDZ0386</u>, <u>Kinga Drozdz</u>)
- 68. Irish Rail, Dublin Bus, Luas, etc. should all commit to providing better public transport to the area. (<u>DraftClonSDZ0223, Trevor Gilligan</u>)
- 69. The Luas is a vital concept for public transport and should form a key part of the Clonburris plan. (<u>DraftClonSDZ0506</u>, <u>Tom Newton DraftClonSDZ0507</u>, <u>Caitriona McClean</u>)
- No guaranteed commitment for the Luas to Lucan or the Dart to Hazelhatch.
 (<u>DraftClonSDZ0537</u>, <u>John Vaughan DraftClonSDZ0536</u>, <u>Michael Jennings DraftClonSDZ0531</u>, <u>Adrienne O'Driscoll DraftClonSDZ0532</u>, <u>Ciaran O'Driscoll DraftClonSDZ0530</u>, <u>Kay Vaughan DraftClonSDZ0533</u>, <u>Marie Tweedy DraftClonSDZ0534</u>, Shay Keogh)
- 71. The Dart to Hazelhatch and the Luas to Lucan initiatives need to be pulled inside the GDA 2026 timeline and a firm commitment given to same. (<u>DraftClonSDZ0536</u>, <u>Michael Jennings DraftClonSDZ0531</u>, <u>Adrienne O'Driscoll DraftClonSDZ0532</u>, <u>Ciaran O'Driscoll</u>)
- 72. Public transport will also play a part in reducing city congestion. Clonburris is ideal location as it has a main railway line passing though it and would be ideal for a bus and Luas link. (DraftClonSDZ0506, Tom Newton DraftClonSDZ0507, Caitriona McClean)

Chief Executive's Response

Existing Public Transport Opportunities

Further to the concerns raised in submissions in relation to the adequacy/absence of existing and planned public transport infrastructure, it is reiterated that the subject SDZ lands are ideally positioned to be served by an existing network of strategic orbital and radial roads (R120, R136, R113, L1058, L1059), by a strategic cross metropolitan railway corridor (Kildare/Cork Railway Line) and by an uninterrupted pedestrian and cycle route into Dublin City (Grand Canal Greenway).

The Kildare/Cork Railway Line includes a four track system between Park West and Hazelhatch railway stations. Commuter rail services to and from Dublin City Centre along the rail line have been augmented through the upgrading of the Phoenix Park Tunnel for regular rail passenger services providing access to Connelly, Pearse and Grand Canal Dock stations. Access to services along the rail line from the SDZ lands are currently afforded by the Clondalkin-Fonthill Railway station. The





opening of the Kishoge Railway Station, which was constructed along Grange Castle Road as part of the Kildare Route project, is the subject of the Planning Scheme's phasing programme.

The No. 13 bus also currently operates as a high frequency service between Dublin City and Grange Castle Business Park, via the southern boundary of the SDZ Lands. Bus lanes are also in place to serve the SDZ lands along Grange Castle Road (R136), Fonthill Road North (R113), Adamstown Avenue (L1058) and Thomas Omer Way (L1059).

This presents a unique opportunity to create a draft planning scheme that connects with, capitalises on and augments an existing networks of strategic transport services and infrastructure. Sustainable modal splits with a choice of transport options and reduced car dependency can therefore be achieved on the SDZ lands that would be difficult to achieve elsewhere within the County and Region.

Planned Public Transport Opportunities

Further to concerns raised in submissions in relation to committing to the planned transport proposals that have been modelled as part of the Transport Assessment and Strategy, a submission from the NTA on the Draft Planning Scheme confirms that the NTA is committed to deliver the level of public transport infrastructure required to serve Clonburris including transport proposals that forms part of the element of the Transport Assessment and Strategy such as the DART Underground and Core Bus Network proposals. This includes orbital and local bus routes modelled as part of the strategy (see below). The submission of the NTA also states that it is intended to complete the BusConnects Programme and to deliver a more efficient and flexible bus service by 2019 that will cater for the demands of the SDZ Planning Scheme.

Further to concerns raised in submissions in relation to the provision of local and orbital bus routes, the Draft Planning Scheme's street network has been designed for planned orbital bus routes as well as local bus routes. These routes have been modelled as part of the Transport Assessment and Strategy (Chapter 7) that accompanies the Draft Planning Scheme. Bus frequencies of between 5 and 11 minutes are projected. Planned core routes include a Tallaght - Blanchardstown Core Orbital Route, a proposed Tallaght-Liffey Valley Secondary Orbital Route. Planned local routes include a Lucan-Park West Route and a Grange Castle-Liffey Valley Route. Both the Kishoge and Clondalkin-Fonthill Railway stations will form focal points for the two planned urban centres within the SDZ lands. Both stations will also serve as interchanges between rail, bus, car, walking and cycling particularly the station at Clondalkin-Fonthill, which has potential capacity to serve as an interchange with the planned Tallaght – Blanchardstown Core Orbital Bus Route.

Further to submissions in relation to the absence of public transport opportunities in general, the SDZ lands will be served (both directly and indirectly) by additional high quality public transport infrastructure projects planned under the NTA's Transport Strategy for the Greater Dublin Area 2016 – 2035. These projects include the DART Expansion Programme, the Lucan Luas, the Tallaght – Blanchardstown Core Orbital Bus Route and other Core Radial Bus Routes. These planned projects will ultimately connect the SDZ lands, including existing public transport services and infrastructure, into an integrated and high frequency cross metropolitan network of orbital and radial public transport routes.

The DART expansion programme will provide fast, high frequency electrified services to Hazelhatch on the Kildare Line and will incorporate an underground rail link through Dublin City Centre also enabling passengers on the Kildare Line to connect with DART service on other lines. Core bus routes will also serve high frequency bus services with high passenger numbers and will serve significant destinations in the Dublin Metropolitan Area while being augmented by local bus routes and provide





a faster and more efficient alternative to car traffic along a network of existing and new bus lanes. In terms of the capacity of the planned DART expansion programme, frequencies of 7.5 minutes from Clonburris to the City entre are projected. The Tallaght – Blanchardstown Core Orbital Bus Route will connect of Tallaght, Clondalkin, Lucan and Clondalkin via the SDZ lands with projected frequencies of 5 minutes thus introducing a new orbital service not previously available within the Dublin Metropolitan Area and addressing many concerns raised in submissions.

The above transport projects have been modelled as part of the Transport Assessment and Strategy that accompanies Draft Planning Scheme and the projected horizon years for each of the transport projects (2026 and 2035) are detailed in the Assessment and Strategy (Chapter 6). The phasing programme contained in the Draft Planning Scheme also includes for the opening of the Kishoge railway station and the construction of strategic streets and junctions that will serve orbital and local bus routes within Phases 1 and 2, however, these are minimum requirements and such transport infrastructure may be delivered at an earlier stage of development. Further issues in relation to the phasing and timing of public transport proposals are dealt with under the Section 2.2.2 (Public Transport Accessibility) and Chapter 4.0 (Phasing) summaries and responses of this report.

In summary, the Draft Planning Scheme proposes to maximise route choice and maximise access for different modes of transport while balancing the needs of the car in a manner that will provide choice for existing and future commuters while reducing reliance on the car. This further addresses concerns raised in submissions received in relation to improving public transport options and addressing traffic congestion.

Public Transport Accessibility

In terms of concerns raised in relation to the adequacy of the proposed public transport for vehicular movement, an integrated network of streets that promotes permeability and accessibility for different modes of transport has been designed for the SDZ lands. This permeable street network has been designed in accordance with the Design Manual for Urban Roads and Streets (DMURS) and consists of a hierarchy of streets with differing designs and functions in terms of carriageway widths, junctions, traffic speeds, public transport provision, integration of pedestrian and cyclist movement and traffic volumes.

Streets at the higher end of the hierarchy (Arterial and Link Streets) will serve as strategic corridors for multiple modes of transport, including public transport, across the SDZ lands. These streets will help maximise access to existing and planned rail services, utilise and link existing bus lanes, serve core and local bus routes and contribute to the creation of multi-modal public transport interchanges at Clondalkin-Fonthill and Kishoge Railway Stations.

While Arterial Streets have been designed to accommodate strategic bus routes such as the planned and modelled Tallaght - Blanchardstown and Tallaght-Liffey Valley Secondary Orbital Routes; Link Streets have been designed to accommodate local bus routes such as the modelled Lucan-Park West and Grange Castle-Liffey Valley Local Routes. This street and bus route network is modelled to connect the planned Core Orbital Bus Routes with each other and with both rail stations. A planned network of pedestrian and cycle routes that will permeate the SDZ lands and connect public transport hubs. Further to concerns raised in submission in relation to provision for existing communities, the planned street network and pedestrian and cyclists network provides opportunity to connect surrounding residential areas to existing and planned public transport infrastructure. Further to concerns raised by residents, the proposed pedestrian and cyclist links between the SDZ lands and existing communities (as detailed in Figure 2.2.2 of the Draft Planning Scheme) are important from the perspective of pedestrian and cyclist permeability, improving route and transport mode choice, and reducing trip lengths for existing residents.





In terms of concerns raised in submissions in relation to future proofing of streets for public transport such as Luas, Arterial Streets designated throughout the SDZ lands will, in accordance with DMURS, be subject to wider carriageway width requirements (up to 7 metres) compared to other street typologies. Existing bus lanes will also be retained and augmented in a manner that will increase the scope for public transport options. It is also proposed to upgrade existing Arterial Streets with signalised junctions as detailed under the Transport Assessment and Strategy (Chapter 7) that accompanies the Planning Scheme. Furthermore, it is a requirement that planning applications for residential, retail or employment development within the SDZ lands shall provide for and/or integrate with a choice of direct or indirect multi-modal routes to existing or planned public transport nodes.

Public Transport Adequacy

Further to the concerns highlighted in submissions received in terms of adequacy of public transport proposals and roads capacity for buses, the following are some of the primary conclusions of the Transport Assessment and Transport Strategy that accompanies the Draft Planning Scheme in relation to a modelled horizon year of 2035:

- Approx. 75% of residents will be able to access a bus stop within 400 metres and a train station within 800 metres walking distance;
- Approx. 54% of trips in the AM peak (7 AM 10 AM) will be undertaken by walking, cycling and public transport;
- A large proportion (30%) of public transport trips which originate in Clonburris will be destined for Dublin City Centre;
- Planned orbital routes will result in a public transport mode share of 45% for the Tallaght Sector and 42% in the North West Sector of Dublin City;
- Traffic generated by Clonburris will contribute to less than 1% of the overall traffic on the strategic road network in the AM peak period;
- Areas within the N4/N7/M50 boundary will experience congestion and delay in 2035 irrespective of whether Clonburris is developed; and
- The majority of identified junctions in the vicinity of Clonburris will operate satisfactorily in peak periods (AM, Lunch Time, School Run and PM).

Within the context of the above, submissions of support from the Eastern and Midlands Regional Assembly, CIE, Dublin Bus and NTA are noted.

Further to a submission from CIE, a Park and Ride facility with associated disabled, bus, taxi and cycle parking facilities has been built at the Clondalkin-Fonthill Railways station and a similar facility has been permitted at the Kishoge Railway Station under the Kildare Route Project Railway Order. The draft planning scheme seeks to incorporate both Park and Ride facilities into mixed use building forms.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.

2.2.3 Pedestrian and Cycle Movement

- 1. Safety concerns are raised for cyclists, in relation to opening up the cul-de-sacs to allow cyclists take a short cut to the R136. (<u>DraftClonSDZ0040</u>, <u>Foxborough Residents Group</u> Lucan, <u>Foxborough Residents Group</u>)
- Cycleways should be dedicated and off road. Cycleways should lead to all important locations such as schools, shops, and residential estates with no obstructions. (<u>DraftClonSDZ0041</u>, <u>Jonathan Kavanagh</u>)





Objections to proposed local permeability links along northern boundaries of the planning scheme (Oldbridge, Rossberry, Tullyhall and Foxborough etc.) include issues that relate to interpretation of permeability, impact on residential amenity, child safety, crime, anti-social behaviour and impact on property values. Suggested solutions include providing additional transport solutions and carrying out further research. (DraftClonSDZ0096, Laura Flanagan DraftClonSDZ0098, Declan Donnelly DraftClonSDZ0111, Lucan Residents, Clonburris Lucan Action Group DraftClonSDZ0159, Paula McMahon DraftClonSDZ0073, Jim Houlihan DraftClonSDZ0099, Tanya McDonald Donnelly DraftClonSDZ0100, Frances Norton DraftClonSDZ0171, A Fahy DraftClonSDZ0173, Lisa Greene DraftClonSDZ0166, Andrew Mowatt DraftClonSDZ0180, Rupert Fuller DraftClonSDZ0215, Graham Walsh DraftClonSDZ0216, LIONA O'TOOLE DraftClonSDZ0218, helen Nix DraftClonSDZ0219, Donncha Cleary DraftClonSDZ0107, Peter Corby, Griffeen Glen Residents Association DraftClonSDZ0220, Joe McDermott DraftClonSDZ0237, Hugh McSweeney DraftClonSDZ0255, James Haughton DraftClonSDZ0192, Brian O'Neill DraftClonSDZ0245, Stephen Murphy DraftClonSDZ0193, Kim Rice DraftClonSDZ0194, Brian Shortall DraftClonSDZ0235, Edina Almasi DraftClonSDZ0196, Andrea Panikova DraftClonSDZ0197, Damian McKillop DraftClonSDZ0231, Jennifer Winters DraftClonSDZ0198, Aine McKinlay DraftClonSDZ0267, Niamh Brennan DraftClonSDZ0265, Ian McLean DraftClonSDZ0248, Caroline O'Brien DraftClonSDZ0284, Evelyn Smyth DraftClonSDZ0285, Carol Hogg DraftClonSDZ0290, Agnes Maher DraftClonSDZ0331, Elaine Patriarca DraftClonSDZ0238, Martin Whelan DraftClonSDZ0333, Gary Hore DraftClonSDZ0309, Kim O Halloran DraftClonSDZ0262, Joseph Dolan DraftClonSDZ0264, Christine Broderick DraftClonSDZ0266, Steven Abbey DraftClonSDZ0312, Tina Mc Garry DraftClonSDZ0054, Celine Dunning DraftClonSDZ0200, Lisa Murtagh DraftClonSDZ0206, Sean Smith DraftClonSDZ0278, Liam Swan DraftClonSDZ0347, Una Mullaney DraftClonSDZ0191, Rafal Marzec DraftClonSDZ0204, William Lavelle DraftClonSDZ0393, Ronan Burke DraftClonSDZ0396, Emer Lynch DraftClonSDZ0397, Marta Isopo DraftClonSDZ0363, Marta Estalayo DraftClonSDZ0352, Rita O'Brien DraftClonSDZ0279, Lisa Fitzpatrick DraftClonSDZ0280, John Egan DraftClonSDZ0367, ciaran daly <u>DraftClonSDZ0401, Joyce Dolan DraftClonSDZ0403, Kerrie Walsh DraftClonSDZ0356, Peter</u> Flynn DraftClonSDZ0110, Maria Smith DraftClonSDZ0101, Peter Kelly DraftClonSDZ0263, Eilís Slattery DraftClonSDZ0375, Anita Fletcher DraftClonSDZ0376, Marie Fitzpatrick DraftClonSDZ0378, Patrick Tully DraftClonSDZ0413, Tania Daly DraftClonSDZ0414, Fiona Moriarty DraftClonSDZ0417, Siobhan Donnelly DraftClonSDZ0420, Ian Lamon DraftClonSDZ0432, Sara Lemos DraftClonSDZ0056, Elizabeth Grace DraftClonSDZ0143, colm grogan DraftClonSDZ0470, Stephen O'Brien DraftClonSDZ0475, Stephanie Fleming DraftClonSDZ0474, Conor Smith DraftClonSDZ0473, Mark O'Byrne DraftClonSDZ0472, Mark Brennan DraftClonSDZ0431, Andrew Shinnick DraftClonSDZ0467, Gavin Byrne DraftClonSDZ0468, Jack Byrne DraftClonSDZ0469, Richard Gleeson DraftClonSDZ0183, karen hayes DraftClonSDZ0184, Barry Jenkinson DraftClonSDZ0185, Hazel Smyth DraftClonSDZ0433, Ciara Reidy DraftClonSDZ0435, Tilly Reidy DraftClonSDZ0186, Nicola Kennedy DraftClonSDZ0438, Des Delaney DraftClonSDZ0189, mark reid DraftClonSDZ0476, Lynne Cosgrave DraftClonSDZ0441, Liam Reidy DraftClonSDZ0477, Sarah Gill DraftClonSDZ0478, Muhammad Ali DraftClonSDZ0479, Anna Wezyu DraftClonSDZ0480, Gill Devereux DraftClonSDZ0450, Cherie Lynch DraftClonSDZ0449, Marian Spollen DraftClonSDZ0448, Declan Cotter DraftClonSDZ0225, Sarah Moroney DraftClonSDZ0447, Aine O'Sullivan DraftClonSDZ0444, Adrian Reidy DraftClonSDZ0445, Nuala Reidy DraftClonSDZ0257, Deirdre McIntyre DraftClonSDZ0294, Kenny Doyle DraftClonSDZ0297, Celine Kiernan DraftClonSDZ0298, Laura Spencer DraftClonSDZ0299, Sharon Cleary DraftClonSDZ0236, ISO Solutions Ireland, ISO Solutions Ireland DraftClonSDZ0502, Ed O'Brien & John Curran TD, Fianna Fail Dublin Mid West DraftClonSDZ0497, Owner/ Occupier DraftClonSDZ0322, Catherine Brady DraftClonSDZ0491, Wayne Quinn DraftClonSDZ0390,





Tom Fitzpatrick DraftClonSDZ0421, Lesley Keogh DraftClonSDZ0422, Jonathan Mercier DraftClonSDZ0423, Damien Moloney DraftClonSDZ0424, John Coleman DraftClonSDZ0425, Sinead Hall DraftClonSDZ0426, Breeda De Vines DraftClonSDZ0427, Ciara Weafer DraftClonSDZ0428, Helena Doyle DraftClonSDZ0429, Edelle Boles DraftClonSDZ0430, Ashleigh D'Arcy DraftClonSDZ0451, K E Fendic DraftClonSDZ0452, Leighanne Spollen DraftClonSDZ0453, Skirmante Doda DraftClonSDZ0454, Sean Shortt DraftClonSDZ0527, Laura Gaughan DraftClonSDZ0528, Bernard Gaughan DraftClonSDZ0525, Dermot McGreal DraftClonSDZ0540, John McGivney, Finnstown Abbey Residents Association DraftClonSDZ0541, Mags Phelan DraftClonSDZ0542, Ciara McHugh DraftClonSDZ0543, Terence Phelan DraftClonSDZ0544, Martina Magee DraftClonSDZ0545, Geoff Grice DraftClonSDZ0546, Sandra Coleman DraftClonSDZ0550, Cian Fleming DraftClonSDZ0483, Nuno Limos DraftClonSDZ0485, Grace Quinn DraftClonSDZ0487, Liam Canty DraftClonSDZ0489, Sarah Walsh DraftClonSDZ0484, Liam Lynch DraftClonSDZ0486, Brian Kennedy DraftClonSDZ0488, Michaela Larsson DraftClonSDZ0490, Elaine McManamly)

- 4. Submission outlines the opening of cul de sacs has no benefit to the people living in the area and is an unacceptable change to the lands current use. Shows disregard to the existing residents as it is only to accommodate the new residents of Clonburris. (<u>DraftClonSDZ0043</u>, Jeanine Nolan)
- 5. That no estates with cul de sacs / closed roads in particular in Balgaddy, Ashwood Estate, Oldbridge, Rossberry, Tullyhall and Foxborough be opened up by the Development of the Clonburris SDZ. (DraftClonSDZ0232, Cllr Francis Timmons)
- Submission on behalf of Clondalkin community group highlights concerns in relation to the opening of cul-de-sacs. (<u>DraftClonSDZ0246</u>, <u>George Graham</u>, <u>Westbourne Community</u> <u>Group</u>)
- 7. The opening up of cul de sacs for pedestrian access will impact on parking in existing housing estates. (DraftClonSDZ0270, Joan Johnson)
- 8. Submission from Lucan resident and Principal of Adamstown Castle ETN advises that contiguous estates need to be opened up so as to allow free movement of pedestrians and cyclists throughout the general Lucan/Clondalkin area. (DraftClonSDZ0313, Tom Moriarty)
- New permeability links to/from existing residential estates should only be proposed following direct consultation with residents of those estates. (<u>DraftClonSDZ0204, William Lavelle</u>)
- 10. Submission outlines that the plans to open up cul-de-sacs to let traffic through is an atrocious and outrageous idea that is a disgrace from a safety standpoint and from general grounds of decency. (DraftClonSDZ0402, Anna O'Neill)
- 11. The opening up of cul de sacs will give rise to security and safety issues. (<u>DraftClonSDZ0334</u>, Gerard Griffin)
- 12. Submission outlines concerns about the opening of existing cul de sacs. Considering most owners are in negative equity due to the time the houses were bought, this plan will devalue their houses as it will make quiet roads currently safe for families playing dangerous and busy. (DraftClonSDZ0370, Shirley Clarke)
- Lucan resident raises opposition to opening of existing Cul-de-Sacs. (<u>DraftClonSDZ0353</u>, <u>Stephen O' Rafferty</u>)
- 14. Submission from Clondalkin resident notes that the Planning Scheme has identified overbridges as a solution to overcoming barriers to pedestrian and cycle movement. It is suggested that passageways and laneways beneath Link Roads, the railways and Arterial Roads could be considered as a faster solution that would reduce noise and air pollution problems. (DraftClonSDZ0358, Eoin Ó Broin)
- 15. Objection to the bridge to the rear of Kilcronan estate due to traffic generation and antisocial behaviour. (DraftClonSDZ0392, Gerard Smyth)





- 16. School children at Lucan East Educate Together primary school are concerned about current cul de sacs in their area being opened up with new developments. (<u>DraftClonSDZ0102, Eddie Fox, Lucan East Educate Together NS</u>)
- 17. Opposition is raised with regard to the opening of existing cul-de-sacs. (<u>DraftClonSDZ0224</u>, Valerie Mcneill)
- 18. Opposition is raised to the opening of cul de sacs as this will increase traffic volumes and speed, with these areas being used as rat runs. This would decrease the safety of children playing in the area. (DraftClonSDZ0258, Robert McNeill)
- 19. The opening up of cul de sacs to pedestrians will increase anti-social behaviour and decrease the security for children playing in the area. (<u>DraftClonSDZ0258</u>, <u>Robert McNeill</u>)
- 20. The use of off road pedestrian and cycle routes are very welcome as a safe and environmental alternative to cars. The permeability routes through estates linking different parts to schools and amenities should encourage cycling and walking within the area. Boundary walls of existing estates should not be removed for permeability routes (Figure 7.21 p.88) unless all residents are in agreement. (<u>DraftClonSDZ0308</u>, <u>Madeleine Johansson</u>, <u>People Before Profit</u>)
- 21. Concern raised by residents regarding the opening of Cul de sacs in Tullyhall and other developments. (<u>DraftClonSDZ0504</u>, <u>South Dublin County PPN</u>, <u>South Dublin County Public Participation Network</u>)
- 22. The extensive cycle lanes are welcomed however concern is raised in relation to the quality of these lanes based on existing cycle lanes in Lucan, Clondalkin and Adamstown. (<u>DraftClonSDZ0504</u>, <u>South Dublin County PPN</u>, <u>South Dublin County Public Participation</u> Network)
- 23. There should be no vehicular access points into Balgaddy. Foxdene Avenue in particular is unsuitable as a vehicular connecting point and is very difficult for drivers to see pedestrians and small children. (<u>DraftClonSDZ0505</u>, <u>Paula Kelly</u>)
- 24. It should be noted that poor provision of adequate pick up and drop off areas will not deter parents from driving their children to school. It will just encourage dangerous and illegal parking and will in turn reduce the number of children walking to school. (DraftClonSDZ0505, Paula Kelly)
- 25. Concerns are raised in relation to the opening of cul-de-sacs in terms of impact on quality of life for existing residents by reason of traffic and pedestrian activity. It is requested that permeability routes be re-evaluated and that interfering with existing cul de sacs should not be carried out without consultation with residents. (DraftClonSDZ0419, Cllr. Emer Higgins, Cllr. Vicki Casserly & Cllr. Kenneth Egan)
- 26. Concern relating to the introduction of permeability links into established estates. (<u>DraftClonSDZ0537</u>, <u>John Vaughan DraftClonSDZ0536</u>, <u>Michael Jennings DraftClonSDZ0531</u>, <u>Adrienne O'Driscoll DraftClonSDZ0532</u>, <u>Ciaran O'Driscoll DraftClonSDZ0530</u>, <u>Kay Vaughan DraftClonSDZ0533</u>, <u>Marie Tweedy DraftClonSDZ0534</u>, Shay Keogh)
- 27. Submission welcomes the emphasis on permeability (<u>DraftClonSDZ0498, Cllr Breeda Bonner</u>)
- 28. Strongly objects to the opening up of cul de sacs in Foxborough and recommends that the cul de sacs remain closed and additional transport for the area is provided before houses are sold i.e., buses, opening the train stations. (DraftClonSDZ0328, Abbie Clissold)
- 29. Submission states that all green routes should be via Lock View Road over to the Grand Canal Way. (<u>DraftClonSDZ0606, Sandra Scully</u>)
- 30. Objection is raised to proposed pedestrian bridges coming into the existing Kilcronan residential estate. The proposed bridges will attract antisocial behaviour including loitering and muggings. There is an existing bridge located less than 100 metres away. Proposed bridges should be relocated further up the Grand Canal where they are needed. (DraftClonSDZ0389, Ingrid Mc Donnell, Mrs Giggles)





- 31. It is not clear from the Draft Planning Scheme where cyclists and pedestrians will have access to the Grand Canal. (DraftClonSDZ0382, Paul Corcoran, Dublin Cycling Campaign)
- 32. Sinn Féin submission states that the SDZ should limit the opening up of existing settled estates with new pedestrian or vehicular access points, particularly in Ashwood, Tullyhall, Oldbridge, Rosberry and Foxborough. Existing cul-de-sacs should not be opened up in order to preserve the integrity of existing settled estates. (DraftClonSDZ0383, Eoin Ó Broin TD, Cllr Danny O'Brien & Cllr Mark Ward)

Chief Executive's Response

Network and Safety

In the interest of place making and promoting a shift to more sustainable modes of transport, the Draft Planning Scheme promotes cycling and walking through the incorporation of a network of dedicated and street integrated pedestrian and cyclist routes. Further to concerns raised in submissions in relation to the design and safety standards of cycle routes, it is requirement for all streets within the SDZ lands to be designed in accordance with the National Cycle Manual (2011) and DMURS (2011). Further to the example street typology cross section and plans included within the Draft Planning Scheme, these will include both on street and off-street cycle lanes depending on the function and design speed of streets.

Pedestrian and cycle routes that are street integrated will also connect with and be augmented by dedicated strategic pedestrian and cycle routes (see Section 2.3 – Green and Blue Infrastructure) that will permeate open spaces, parks, urban spaces and linear green spaces. These dedicated strategic pedestrian and cycle routes will in turn connect with the green route along the Grand Canal Way as illustrated on Figure 2.2.7 of the Draft Planning Scheme.

The proposed pedestrian and cycle routes will ultimately create a linked network that maximises route choice for pedestrians and cyclists and further cater for this form of activity and movement in the interest of health and wellbeing and also promoting sustainable forms of transport. In accordance with the recommendations of submissions, this will ensure that pedestrian and cycle routes will afford direct and indirect access to schools and local facilities especially parks, open spaces, public transport, retail and retail services.

Proposed Local Pedestrian and Cycle Links/Bridges

The pedestrian and cycle network is designed to improve activity while improving passive surveillance in streets and spaces in accordance with the principles of urban design. This should help discourage anti-social behaviour. Further to a submission, the creation of underpasses that do not benefit from passive surveillance are not recommended.

Research (Permeability Best Practice Guide, 2013) has shown that local permeability improvements for existing areas such as those indicated on Figure 2.2.2 and 2.2.3 of the Draft Planning Scheme can reduce walking and cycling distances to schools, shops, public transport and other community facilities by delivering new links and opening barriers to movement. These can have many local economic, public transport, health and community development benefits. Within the context of submissions received that both support and object to proposed local pedestrian, vehicular and cyclist links/bridges with existing communities (Ashwood, Balgaddy, Tullyhall, Old bridge, Rossberry, Tullyhall, Kilcronan etc.), the Draft Planning Scheme seeks to provide both existing and new communities with direct or indirect access to existing and planned facilities and infrastructure within the SDZ lands via the planned pedestrian and cyclist route network. It should be noted that only one of the links is proposed for vehicles (Ashwood) while the remaining links are proposed for





pedestrians and cyclists only. The proposed bridge that will connect with lands on the southern side of the Grand Canal near Kilcronan is also proposed for pedestrians and cyclists only.

It should be noted that the proposed local and pedestrian links with existing communities are indicative only and, in accordance with the recommendations of the Permeability Best Practice Guide (2013), should be subject to further assessment and approval (planning application or Part 8 approval) including further public consultation.

It is recommended that the Draft Planning Scheme be amended to clarify the above.

Chief Executive's Recommendation

It is recommended that the following amendment be made to the Draft Planning Scheme

Include the following text under Section 2.2.3 (Pedestrian and Cycle Movement):

Proposed Local and Pedestrian and Cycling Links with existing communities are indicative only and, in accordance with the recommendations of the Permeability Best Practice Guide (2013), shall be subject to further planning approval.

Strategic Environmental Assessment of Chief Executive's Recommendation

No interaction with Strategic Environmental Objectives.

Appropriate Assessment Screening of Chief Executive's Recommendation

No significant adverse impacts on European sites within the SDZ's zone of influence are predicted.

2.2.4 Street Network and Vehicular Movement

- 1. Major arterials should have two lanes in each direction along with one bus lane and bicycle in each direction. (<u>DraftClonSDZ0003, Scott greenwood</u>)
- 3. Observation outlines that road improvement works should definitely be in the plan. Also, definitely need more public transport. Another bus route and a Luas line would be great. (DraftClonSDZ0004, Jordan Gallagher)
- 4. Submission from NTA states that further reference should be made in relation to promoting the principle of filtered permeability and that a statement should be included in relation to setting out how motorised traffic will not be permitted to penetrate through many development blocks. To reflect Figure 2.2.7 it is advised that reference to providing a choice of vehicular routes in relation to Link Streets and traffic cells should be removed. (<u>DraftClonSDZ0188</u>, <u>David Clements</u>, <u>National Transport Authority</u>)
- 5. Submission on behalf of residents association advises that the Ninth Lock Road should not to be widened. (DraftClonSDZ0242, Deirdre Nolan, Cappaghmore Residents Group)
- Submission on behalf of Clondalkin community group highlights concerns in relation to the widening of the 9th Lock Road. (<u>DraftClonSDZ0246</u>, <u>George Graham</u>, <u>Westbourne</u> <u>Community Group</u>)
- 7. Submission on behalf of landowner (Cairn Homes PLC) suggests that the Draft Planning Scheme includes a provision to incorporate lands freed up by new junction arrangements or road embankments to be incorporated into adjacent development plots where appropriate. (DraftClonSDZ0351, Cairn Homes Plc, Cairn Homes)





- 8. A review and redesign of the Griffeen retail/Griffeen Educate Together and Griffeen Glen Boulevard entrance and also the entrance to the Lucan East Educate Together School is required to reduce traffic congestions on Griffeen Avenue and Griffeen Road and access to and from Griffeen Glen Boulevard. (<u>DraftClonSDZ0269</u>, <u>Shane Roche</u>)
- 9. Redesign the R136 and its junctions with focus on improved accesses to N4 and M50. The junction at Balgaddy Road and R136 should also be redesigned to address the rush hour volumes in morning on Griffeen Avenue and Roads. (<u>DraftClonSDZ0269</u>, <u>Shane Roche</u>)
- 10. Submission outlines that the road setup when coming from Griffeen Avenue is wrong. Currently a single school takes traffic from Griffeen Avenue into the current Educate Together School. There is a plan to add another school beside it. Simple proposal is to close that road into the school and make people come from the Adamstown road. At the very least make it a one way system, come in from Griffeen Avenue and come out onto Adamstown road (DraftClonSDZ0404, Brendan Shiels)
- 11. The road infrastructure will be subject to detail design but recognition of the need to provide high quality interaction between bus, cyclist and pedestrian is needed at this early stage to ensure adequate road space is allowed for appropriate measures. This is especially true at bus stops and at interchange locations. (DraftClonSDZ0336, Ray Donnellan, Dublin Bus)
- 12. Schools and the drop off and collection arrangements for children needs particular focus when they are likely to coincide with bus facilities. (DraftClonSDZ0336, Ray Donnellan, Dublin Bus)
- 13. Submission would request greater clarity on the phasing of junction upgrades to ensure the main roads serving Clonburris, such as the R120, Outer Ring Road and Fonthill Road, are not adversely affected by potential traffic increases. (<u>DraftClonSDZ0368</u>, <u>Frances Fitzgerald TD</u>)
- 14. Existing traffic congestion on Griffeen Avenue, in particular at the entrance to both of the Educate Together Schools.
 - Questions if there are plans for traffic management/widening of the road between the roundabout and the traffic lights (Griffeen Ave to Outer Ring Road)
 - Any plans to have another vehicle entrance of the Educate Together School which borders alongside Oldbridge.
 - Another entrance to this school within this new development would help to take of some of the traffic away. Otherwise this means more traffic coming from the Outer Ring Road onto Griffeen Ave to gain access to the school (s).
 - The submission states that the area and its roads (M50, Outer Ring Road and Fonthill Road) cannot cope with such an increase in car traffic.
 - (DraftClonSDZ0304, PAULINE KEOGH)
- 15. Ninth Lock Road not to be widened (<u>DraftClonSDZ0499</u>, <u>Deirdre Nolan</u>)
- 16. The proposed plans for Clonburris show a road that joins Griffeen Avenue with the Adamstown Road. This must not be put in as it will increase traffic on this road. (DraftClonSDZ0434, Nathaniel Doyle)
- 17. Traffic in the area has increased substantially, in particular moving from the Griffeen Glen Road to the Outer Ring Road.
 - Lucan needs upgrading of roads and a traffic management plan in order to allow current residents get to and from work and other trips on a daily basis. Roads such as the N4, the Outer Ring Road and Griffeen Avenue are at full capacity and will get worse.
 - No additional roads should connect to the Griffeen Avenue road as it is already congested. The proposed new school adjacent to Griffeen Valley East Educate Together School will have traffic implications for the area, as most local parents drive their children to school.
 - A new road is proposed joining Griffeen Avenue roundabout with the Adamstown Road. This road should be excluded as it will increase traffic in the area.





- Concern is raised as the location of employment for residents living at Clonburris, this may result in increased traffic along the M50 area. (DraftClonSDZ0511, Julie Kearns)
- 18. Sinn Fein submission states that traffic levels, particularly at peak travel to/from work and school drop off/collection times, are currently a significant concern for residents living adjacent to the boundary of the SDZ. It is not clear how the proposed road network contained in the Draft Planning Scheme will address existing and future traffic volumes. (DraftClonSDZ0383, Eoin Ó Broin TD, Cllr Danny O'Brien & Cllr Mark Ward)

Chief Executive's Response

Overall Network and Junction Upgrades

An integrated network of streets that promotes permeability and accessibility for different modes of transport has been designed for the SDZ lands. This permeable street network has been designed in accordance with the requirements of the Design Manual for Urban Roads and Streets (DMURS) the National Cycle Manual (2011), and the Guidelines for Setting and Managing Speed Limits in Ireland (2015)

The planned street network consists of a hierarchy of streets with differing designs and functions in terms of carriageway widths, junctions, traffic speeds, integration of pedestrian and cyclist movement, provision for public transport and traffic volumes. The prescribed street network is designed to attract larger volumes of traffic to the more strategic Arterial and Link Streets at moderate speeds by offering users a legible and direct route through the SDZ lands. The slower nature of Local Streets will result in them being less attractive to through vehicular traffic.

Streets at the higher end of the hierarchy (Arterial and Link Streets) will therefore serve as strategic corridors for multiple modes of transport, including public transport, across the SDZ lands. These streets will help maximise access to existing and planned rail services, utilise and link existing bus lanes, serve core and local bus routes and contribute to the creation of multi-modal public transport interchanges at Clondalkin-Fonthill and Kishoge Railway Stations. The planned street hierarchy for the SDZ lands is summarised under Table 2.2.1 and illustrated in Figure 2.2.1 of the Draft Planning Scheme.

Further to the findings of the Transport Assessment and Strategy that accompanies the Draft Planning Scheme, it is proposed to upgrade the existing strategic roads as urban streets with signalised junctions. A number of key junction improvements and new junctions/connections through and along the strategic/Arterial Streets are also proposed. The junction improvements are identified and detailed under the Transport Assessment and Strategy (Chapter 7) that accompanies the Draft Planning Scheme and Figure 2.2.7 (Overall Movement Concept) of the Draft Planning Scheme. Further to concerns raised in submissions in relation to existing junctions it should be noted that the detailed junction designs are included for the Griffeen Avenue/Grange Castle Road (R136). The upgrade of local junctions will be subject to detailed design at planning application stage in accordance with the requirements of DMURS.

Within the context of the suggestion in a submission to make provision for lands freed up by revised junction upgrades, it should be noted that all junction improvements identified and detailed under the Transport Assessment and Strategy and the Planning Scheme have already been incorporated into the Draft Planning Scheme's Street Network Design. These junction designs have informed block sizes, frontages and dimensions detailed within the overall masterplan contained in Chapter 3 of the Planning Scheme. The ownership of such lands is outside the scope of the Planning Scheme.





Street Layout and Permeability

To maximise permeability and accessibility, the alignment of the planned Street Network is largely open and orthogonal. This is in accordance with the recommendations of the Design Manual for Urban Roads and Streets (DMURS), which are statutory guidelines that have been issued by the Minister for the Environment, Community and Local Government under Section 28 of the Planning and Development Act 2000 (as amended). Planning authorities and An Bord Pleanála, are therefore required to have regard to DMURS and to apply this national policy requirement of the guidelines, in carrying out their functions.

Further to concerns raised in a submission in relation to the open nature and accessibility of the proposed street network, it should be noted that DMURS advises against segregated or closed networks that overly restrict vehicular movement by reason that they tend to channel traffic towards fewer junctions and this can locally concentrate negative traffic impacts at bottlenecks. DMURS favours the use of permeable and open street networks by reason that they maximise connectivity and accommodates the provision of housing within walking distance of public transport. DMURS recommends that filtered permeability networks, that utilise vehicular cul-de-sacs, may be applied with caution where the prioritisation of more sustainable modes of transport are sought. It is advised, however, that overuse of cul-de-sacs can result in negative consequences and that the key to network design is to start with an open network that is refined with filtered elements where there are clear benefits.

Within the context of the above and in order to prioritise pedestrian and cyclist through access, the Draft Planning Scheme provides for the filtering of Local Streets combined with Homezones that provide through routes for strategic pedestrian and cycle routes where junctions intersect with Link or Arterial Streets only. The location of such non-vehicular junctions and Homezones/intimate local streets are detailed on Fig. 2.2.7 of the Draft Planning Scheme. Details of promoting filtered permeability in terms of street design are included in Section 2.8.5 of the Draft Planning Scheme and these include for measures such as street furniture, horizontal and/or vertical measures and landscaping that avoids the use of barriers or bollards and maintains passive surveillance. It is also stated in the Draft Planning Scheme that cul-de-sacs that prevent or limit pedestrian or cyclist access between streets and/or spaces shall not be permitted.

Further to concerns raised in relation to the sufficiency of the proposed street network, a local junction assessment has been carried out as part of the Transport Assessment and Strategy that accompanies the Draft Planning Scheme and in conclusion, it has been found that the majority of junctions will operate satisfactorily in peak periods of traffic.

Further to the concerns raised in submissions in relation to the shared use streets, all streets will provide for the integrated movement and the sharing of space for pedestrians, cyclist and vehicles and this will be designed in accordance with the requirements of DMURS. Arterial and Link Streets will also provide for the movement of public transport in the form of buses. This is demonstrated on the example street plans and cross sections contained in the Draft Planning Scheme. Detailed issues raised in relation to school and drop off facilities will be assessed at planning application stage.

Arterial Streets

Further to the recommendations included in submissions in relation to the design and widening of Arterial Streets, it is advised that the detailed requirements in relation to the design and function of Arterial Streets including carriageways, widths and bicycle lanes are set out under DMURS and the National Cycle Manual. The provisions of the Draft Planning Scheme in relation to Arterial Streets has been framed by the statutory guidance. Within this context, major orbital and cross metropolitan routes such as Grange Castle Road, Fonthill Road North, Adamstown Avenue and





Thomas Omer Way have been designated as Arterial Streets and, further to the Transport Assessment that accompanies the Draft Planning Scheme, no further Arterial Streets are designated or required.

Further to suggestions in submissions in relation to the upgrade of existing strategic roads, it is proposed to upgrade designated Arterial Streets in accordance with DMURS. Such streets, particularly Grange Castle Road (R136) and Fonthill Road North, will also continue to prioritise public transport and existing bus lanes will be retained and augmented. It is stated that road and junction upgrades will include a combination of measures including signalised junctions, double planting, transition zones, on-street parking and frontage from development.

Further to the details contained in DMURS, an example plan and cross section of an Arterial Street upgrade with accompanying example photographs are included under Fig. 2.2.3 of the Draft Planning Scheme. A further street plan is included in Chapter 7 of the Transport Assessment and Strategy that accompanies the Draft Planning Scheme.

Link Streets

It is a requirement of the Draft Planning Scheme for existing roads that are designated as Link Streets (Lock Road, Griffeen Avenue and the Lucan-Newlands Road) to be upgraded as traffic calmed streets. These upgraded streets will be augmented by a framework of new Link Streets that will traverse the SDZ lands in the form of east-west streets to the north and south of the rail line together with a connecting north-south Link Street. Within the context of concerns raised in submissions, the upgrade of existing streets such as the Lucan-Newlands Road/Ninth Lock Road is necessary for the creation of an accessible and permeable street network that is both integrated and coherent.

Local Streets

The purpose of Local Streets is to provide access within communities and to Arterial and Link Streets. Local Streets will act as quieter traffic calmed thoroughfares that are closely fronted and overlooked by development and will provide through access to neighbourhood blocks and local open spaces thus providing a form of traffic calming. In the context of a submission made in relation to restricting turning movements onto local streets at the higher end of the spectrum such as that which will serve Lucan Educate Together School National School and the adjacent proposed Post Primary School, it is advised that such streets are required to be open ended and accessible from a number of different modes.

Public Transport Accessibility and Future Proofing

While Arterial Streets have been designed to accommodate strategic bus routes such as the planned Tallaght - Blanchardstown and Tallaght-Liffey Valley Secondary Orbital Routes, Link Streets have been designed to accommodate local bus routes such as the planned Lucan-Park West and Grange Castle-Liffey Valley Local Routes. This planned street and bus route network will connect the planned Core Orbital Bus Routes with each other and with both rail stations. A planned network of pedestrian and cycle routes that will permeate the SDZ lands will also connect public transport nodes. Further to concerns raised in submission in relation to provision for existing communities, the planned street network provides opportunity to connect surrounding residential areas to existing and planned public transport infrastructure and walking and cycling routes within the SDZ lands. Proposed pedestrian and cyclist links between the SDZ lands and existing communities are detailed in Figure 2.2.2 of the Draft Planning Scheme.

In terms of concerns raised in submissions in relation to future proofing of streets for public transport such as LUAS, Arterial Streets designated throughout the SDZ lands will, in accordance with





DMURS, be subject to wider carriageway widths of up to 7 metres. Existing bus lanes will also be retained and augmented in a manner that will increase the scope for public transport options. It is also proposed to upgrade existing Arterial Streets with signalised junctions as detailed under the Transport Assessment and Strategy (Chapter 7) that accompanies the Planning Scheme.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.

2.2.6 Parking

- Lucan resident requests that bicycle parking at train stations including Fonthill Railway Station be designed to be weather proof and safe from theft. (<u>DraftClonSDZ0014</u>, <u>Adam Sebestyen</u>)
- 2. 2no Car parking spaces should be provided for every house. (<u>DraftClonSDZ0035, Stephen Murray</u>)
- 3. At least one and a half parking spaces per dwelling must be provided as well as parking in shopping areas and stations within the SDZ. While it is excellent that serious efforts are being made to provide good public transport, most people are going to possess a vehicle even if, in optimistic circumstances, it is only used at the weekend. Failure to do so will cause major parking problems.
 - (DraftClonSDZ0050, Pamela Corrigan, Labour Party Clondalkin Branch/ Dublin Mid West)
- Submission outlines that most homes require two/three car parking spaces. Submission
 outlines that units should have at least two parking spaces and additional on road parking
 for visitors. Retail units require parking for staff and allocated visitor parking.
 (<u>DraftClonSDZ0041</u>, <u>Jonathan Kavanagh</u>)
- Lucan resident highlights concern in relation to viability of car free housing by reason of need including for shopping. It is also recommended that new and existing residential development should cater for electric vehicles including charge points. (<u>DraftClonSDZ0178</u>, <u>glenn roche</u>)
- 6. Submission from a former resident of the Adamstown SDZ outlining that the proposal to minimize car parking spaces in Clonburris is naive and fantastical. Potential purchasers will be dissuaded from buying due to lack of own parking. (DraftClonSDZ0271, John Donohue)
- 7. When new schools are built more parking spaces are needed. (<u>DraftClonSDZ0052, Lynda Curtis</u>)
- 8. Public car parks need to open earlier to coincide with school opening times. Cars are currently parking on verges and along roads and access to public car parks would alleviate dangerous situation. (DraftClonSDZ0052, Lynda Curtis)
- 9. Proposing Zero Car Housing in a suburb which is twelve kilometres from the city and has limited amenities and poor transport links, is not practical and seems far removed from the reality of the way people live. To ensure Owner Occupier rates are high in the new area, people need parking spaces. (DraftClonSDZ0055, Ellen Ward)
- 10. Submission outlines concerns that the limited parking spaces for new residents at Clonburris will give rise to them parking in nearby housing estates. The public service transport system in Dublin is so disjointed and unreliable that most people need to have a car. (DraftClonSDZ0406, Bernadette Doyle)
- 11. Submission on behalf of landowner (Cairn Homes PLC) advises that prohibiting the assignment of on –street parking spaces to individual dwellings is problematic and should be omitted in the interest of flexibility. (DraftClonSDZ0351, Cairn Homes Plc, Cairn Homes)
- 12. Submission from Clondalkin resident advises that, based on maximum County Development Plan parking standards, there will be a demand for approximately 11,500 car spaces in

Clonburris



- Clonburris. Concerns are raised in relation to sustainability, impact on use of public transport and use of resources. (DraftClonSDZ0358, Eoin Ó Broin)
- 13. Joint submission from local representatives highlights concerns in relation to over estimating the reliance on public transport, walking and cycling in relation to general parking provision particularly zero car homes in terms of the impact on dwelling tenure and the creation of a sustainable community. (DraftClonSDZ0419, Cllr. Emer Higgins, Cllr. Vicki Casserly & Cllr. Kenneth Egan)
- 14. There is insufficient parking at present, concern is raised with regard to additional cars parking in the area. (<u>DraftClonSDZ0224</u>, <u>Valerie Mcneill</u>)
- 15. In relation to car parking, submission from South Dublin County Disability Advisory and Consultative Panel outlines that:
 - -sufficient well designed car parking and drop off facilities at schools must be addressed to prevent barriers and danger to disabled people and pedestrians through illegal and inconsiderate parking
 - Accessible parking for disabled drivers/ passengers located near key facilities is essential (DraftClonSDZ0503, Selina Bonnie)
- 16. Submission outlines the need for ample car parking, electric car spaces, bike parking, bicycle lanes and trees. (<u>DraftClonSDZ0500</u>, <u>Declan Hanley</u>)
- 17. The provision of car parking spaces must be adequate for the population. With the upgraded public transport services such as the Lucan and the DART extension not being delivered for many years, it is likely that private car ownership will be high. The provision of maximum 1.5 spaces per 3+ bed houses in Zone 2 (Figure 7.51) is highly likely to be inadequate in the short term. (DraftClonSDZ0308, Madeleine Johansson, People Before Profit)
- 18. The draft planning scheme indicates areas without car parking. This will not work in Ireland. Lucan has 2.5 cars per household. (<u>DraftClonSDZ0434, Nathaniel Doyle</u>)
- 19. Introducing the concept of zero car housing which will skew the target demographic with the potential to cause social issues further down the line. (<u>DraftClonSDZ0537</u>, <u>John Vaughan DraftClonSDZ0536</u>, <u>Michael Jennings DraftClonSDZ0531</u>, <u>Adrienne O'Driscoll DraftClonSDZ0532</u>, <u>Ciaran O'Driscoll DraftClonSDZ0530</u>, <u>Kay Vaughan DraftClonSDZ0533</u>, <u>Marie Tweedy DraftClonSDZ0534</u>, Shay Keogh)
- 20. Parking within local housing estates has increased, with particular regard to parking needs of local schools.
 - The corner of Griffeen Avenue and the Outer Ring Road could accommodate a community centre with a car park. This could help alleviate car parking problems in the area, including school pick up and drop off times.
 - The proposed plans show areas without adequate car parking spaces, increased car parking spaces are required in line with those existing in the Lucan area and the rest of Dublin. (DraftClonSDZ0511, Julie Kearns)
- 21. Dublin Cycling Campaign broadly support the statements in relation to bike parking standards, as outlined in Section 7.5.2. Preference is for bike cages with Sheffield hoops (essential) and key card access with high visibility in key locations with passive policing with people walking past often to prevent theft and damage. Reference is made to guidelines recently published by the Dublin Cycling Campaign. Each apartment/house unit should have a minimum 1 bike parking space per unit Provision should also be made for bike share schemes.

(DraftClonSDZ0382, Paul Corcoran, Dublin Cycling Campaign)

Clonburris



Chief Executive's Response

Parking Quantum

Further to the concerns raised in submissions in relation to the quantum of parking required, the Draft Planning Scheme seeks to minimise the number of car spaces and maximise their use within the SDZ lands in order to promote sustainable travel patterns. Car parking for the key land uses in Clonburris are required to be provided in accordance with the standards set out under the South Dublin County Council Development Plan 2016 –2022 and, further to the concerns in submissions, there are requirements in relation to the provision of parking for residential, education and retail uses. The design and operation of such parking will be subject to detailed assessment at planning application stage subject to compliance with DMURS and the requirements of Section 2.8.10 (Design of Parking and Loading) of the Draft Planning Scheme.

The South Dublin County Council Development Plan 2016 –2022 sets out Zone 1 parking standards with higher maximums for general areas of the County and Zone 2 parking standards for town/village centres and areas within 800 metres of a train station or 400 metres or a high quality bus service. The Transport Assessment and Strategy that accompanies the Draft Planning Scheme has carried out an assessment of the proposed car parking standards based on projected parking demand and an Accessibility Assessment. Further to the findings of the Transport Assessment and Strategy, the planning scheme applies Zone 2 parking standards to areas of the SDZ lands that will have high accessibility levels (close to public transport, retail, education and employment etc.) and Zone 1 parking standards to all other areas. The assessment indicates that the parking standards will be more than sufficient to cater for the parking needs of the Planning Scheme. Within this context, the requirement to provide 0.75 to 2 car spaces per dwelling (depending on dwelling size and accessibility) is considered appropriate. Further to concerns raised in a submission in relation to parking provision being dependent on the delivery public transport infrastructure, Zone 1 parking requirements can be applied on a case by case basis until such time as the necessary public transport is available.

Further to concerns raised in submissions in relation to the sustainability of the quantum of parking required to serve the Draft Planning Scheme, an examination of the spatial requirements under the Transport Assessment and Strategy concludes that the majority of parking can be met on-street thus reducing resource and urban design implications.

This approach is consistent with the recommendations of the Guidelines on Sustainable Residential Development in Urban Areas (2009) and the National Transport Authority's Transport Strategy for the Greater Dublin Area 2016-2035, which seeks to implement maximum parking standards that reflect proximity to public transport and limit the availability of parking in urban centres to discourage car commuting. The approach of the SDZ Planning Scheme forms part of the multifaceted approach to reduce car dependency particularly in areas with access to public transport and a mix of uses. This approach seeks to promote a shift to more sustainable modes of transport and address issues such as traffic congestion, which has been raised as an issue in many submissions. As demonstrated by the Transport Assessment and Strategy, there will be sufficient choice of transport options and routes on the SDZ lands to enable this modal shift.

Near Zero or Zero Parking Provision

Further to submissions in relation to reduced parking provision and the allocation of on-street parking, near zero or zero parking provision is only promoted in the higher density areas of the SDZ lands adjacent to Public Transport interchanges and within the urban centres planned around the Clondalkin-Fonthill and Kishoge rail stations. Such development is also subject to a number of





stipulations set out under Section 2.2.6 of the Planning Scheme including demonstration that car parking can be shared between complementary land uses including Park and Ride Facilities.

Within the context of the above, it is a requirement of the Draft Planning Scheme that on-street parking should not be allocated to individual dwellings and the sharing of spaces for residential development with Park and Ride facilities is also particularly encouraged. This will help provide for and ensure for more efficient turnover of spaces and reduce the quantum of required parking. This approach is consistent with the requirements of DMURS.

Electric Vehicle Parking

To facilitate the use of electrically operated cars and bicycles, it is a requirement of the Draft Planning Scheme for developments to provide facilities for the charging of electric vehicles at a rate of up to 10% of the car parking provision. It is further stated that the remainder of parking spaces should be capable of accommodating future charging points.

Bicycle Parking Standards and Design

In terms of concerns raised in submissions in relation to the provision and design of bicycle parking, the Draft Planning Scheme requires secure bicycle parking to be provided throughout Clonburris in line with the minimum parking standards set out under the South Dublin County Council Development Plan 2016 – 2022. It is a requirement for parking to be designed in accordance with the detailed requirements of the NTA's National Cycle Manual (2011). Within this context, the Planning Scheme promotes bicycle parking that are sheltered, secure and designed in a manner that integrates appropriately into the public realm. The minimum provision for residential development is 0.75 to 2 bicycle spaces per residential unit depending on size and accessibility. Lower rates of parking will only be permissible where there is a reduced requirement and this is robustly demonstrated.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.

2.2.5 Bridges

- Submission from CIE advises that detailed discussions will be required with CIE with regard
 to the design of proposed new bridges or upgrade of bridges in the interest of railway safety.
 It is submitted that bridge designs (particularly signal views and bridge clearance) will
 require full compliance with railway regulations and approval from CIE in the form of Bridge
 Agreements. (<u>DraftClonSDZ0295</u>, <u>Aidan Ruane</u>, <u>CIE Group Property Management</u>
 <u>DraftClonSDZ0346</u>, <u>Aidan Ruane</u>, <u>CIE Group Property Management</u>)
- 2. The Planning Scheme lacks detail relating to the design and dimensions of the proposed bridges. (<u>DraftClonSDZ0335</u>, <u>Dietacaron</u>)

Chief Executive's Response

Further to submissions in relation to the design, dimensions and safety of proposed bridges including consultation, it is advised that such details will be subject to application and assessment at planning application or Part 8 stage. Pre-planning consultation will be available prior to planning applications and the opportunity to make submissions will be available to third parties at application or Part 8 stage.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.





2.2.7 Transport Assessment & Mobility Management

- Traffic Impact Assessments should be carried out for all development, and not on a case by case basis as stated. (<u>DraftClonSDZ0035</u>, <u>Stephen Murray</u>)
- 2. Submission from NTA advises that, in order to implement the BusConnects and DART Expansion programmes together with the roll out of the GDA Cycle Network Plan, this will require close co-operation between the NTA, SDCC, landowners and stakeholders. It is advised that planning applications should be accompanied by a commitment to implement a Residential or Workplace Travel Plan, a statement demonstrating consistency with the GDA Transport Strategy and the Clonburris SDZ Transport Assessment (Chapter 7) and a statement setting out how a proposed development will physically promote public transport, walking and cycling. It is also recommended that a regular monitoring, oversight and review structure be established and led by SDCC. (<u>DraftClonSDZ0188</u>, <u>David Clements</u>, <u>National Transport Authority</u>)

Chief Executive's Response

The Draft Planning Scheme requires Transport and Traffic Assessments to be considered on a case by case basis for developments that have the potential to generate a significant increase in trips on the overall transport network in accordance with the thresholds set out under the NTA's Traffic Management Guidelines (2003) and the NRA's Traffic and Transport Assessment Guidelines (2014).

Further to the submission from a local resident, it is not considered appropriate to include a requirement for Traffic Impact Assessments to be carried out for all development. This would place an onerous and unnecessary burden on applications for development that could have an improved or little or no transport traffic impact such as small scale development or public realm/transport improvement projects.

Further to the recommendations of the NTA, it is a requirement of Section 2.2.7 the Draft Planning Scheme for Mobility Management Plans and Workplace Travel Plans to be carried out in accordance with the threshold and recommendations of the NTA's Achieving Effective Workplace Travel Plans: Guidance for Local Authorities (2012). Where such travels plans/MMPs are required these will be assessed at planning application stage and can be subject to planning conditions where appropriate.

Furthermore, and in the context that the Draft Planning Scheme has been drawn up to be consistent with the Transport Strategy for the Greater Dublin Area 2016 – 2035, Section 2.8.2 of the Draft Planning Scheme requires all medium to large scale development proposals to be accompanied by a design statement that:

- Demonstrates compliance with this SDZ Planning Scheme including its various requirements that relate to (inter alia) movement and transport;
- Includes a masterplan that demonstrates proposed and future integration with the development of surrounding sites and Development Areas including vehicular, pedestrian, cycle and public transport connections; and
- Includes street cross sections, plans and a Quality Audit for streets.

In the context that the Transport Assessment and Transport Strategy is a detailed accompanying document that provides background analysis and proposals for the Draft Planning Scheme, it is considered that assessment against the Draft Planning Scheme will be sufficient.

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Section 4.9 of the Draft Planning Scheme sets out details in relation to the monitoring and review of the development of the SDZ lands. This includes a requirement for a complete review of the Planning Scheme as part of Phase 2.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.

Section 2.3 Green and Blue Infrastructure

- 1. Canal should be well lit with cameras. Canal path enlarged and the grass/shrubs cut back. Path on both sides and an extra pedestrian bridge. Canal needs to be used, including water sports for the community, and have passive surveillance to discourage anti-social behaviour. (DraftClonSDZ0041, Jonathan Kavanagh)
- 2. Clondalkin resident suggests that the Planning Scheme makes insufficient use of the Grand Canal as a feature by reason of the absence of proposals for a harbour/moorings and the absence of proposals for surrounding high density apartments with shops/bars/restaurants. It is submitted that this is a wasted opportunity. (DraftClonSDZ0062, Dylan Nolan)
- 3. The Eastern and Midland Regional Assembly submission states that the Regional Planning Guidelines support the integration of Green Infrastructure, Flood Risk Management and sustainable design principles in the development of the planning scheme.

 (DraftClonSDZ0296, malachy bradley, Eastern and Midland Regional Assembly)
- 4. There appears to be very little greenway in the scheme compared to concrete building. (DraftClonSDZ0434, Nathaniel Doyle)
- 5. Increased green areas should be included in the SDZ. The largest green area appears to be located in a floodplain. (<u>DraftClonSDZ0511</u>, <u>Julie Kearns</u>)

Chief Executive's Response

The Draft Planning Scheme has been prepared with the aim of achieving a balanced provision of a new high quality, urban residential environment, sustainable water management and the protection and enhancement of the natural assets of the lands including the Grand Canal. This approach was informed by the Strategic Environmental Assessment process and is supported by the Department of Culture, Heritage and the Gaeltacht.

The Grand Canal is a proposed Natural Heritage Area which hosts a rich variety of plant and animal species including protected species and numerous mature trees and hedgerows. It is a key element in the existing Green Infrastructure Network and the southern tow-path provides an uninterrupted corridor for pedestrian and cyclist movement.

The Grand Canal offers a unique selling point to the Planning Scheme and as such, it is an overarching principle of the Draft Planning Scheme to maximise appropriate access to and use of the Grand Canal. The access and use of the Grand Canal however must be in an ecologically sensitive way, in order to protect the rich variety of plant and animal species including protected species. As such, the Draft Planning Scheme states that Development proposals on the SDZ lands close to the Grand Canal shall protect and incorporate high value natural heritage features including watercourses, wetlands, grasslands, woodlands, mature trees, hedgerows and ditches and include for a 50m set back for all buildings and a 30m set-back distance for development (with the exception of bridges and footpaths) from the pNHA boundary to facilitate the continuity of the Grand Canal as a corridor for protected species, biodiversity, and a fully functioning Green Infrastructure network (See also Sections 2.10 and 2.11).





In relation to the overall amount of green space on the lands, it should be noted that, blue and green spaces will cover approximately 30% of the SDZ lands. These blue and green spaces will take the form of parks, open spaces, constructed wetlands, swales, tree planting, hedgerows, parks, permeable paving, green roofs and a green bridge over the railway line. These spaces will provide for amenity and recreation, biodiversity protection and enhancement, water management and adaption to climate change.

Section 2.3.1 of the Draft Planning Scheme states that in general, the recreation and amenity spaces should all be overlooked by buildings and streets that would provide passive supervision from residents, pedestrians and passing motorists where appropriate. In addition, Section 2.8 of the Draft Planning Scheme refers to design of buildings and passive surveillance. All streets and spaces shall benefit from passive surveillance especially at street corners and boundary treatment to front gardens and privacy strips (for residential schemes) should be unobtrusive and should allow for good passive surveillance.

Chief Executives Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.





Section 2.4 Urban Centres

- Submission advises that development must be completed with provision for an active urban hub that allows for a mix of uses, greater population densities and a choice of public transport in the interest of place making and preventing urban sprawl. (<u>DraftClonSDZ0140</u>, <u>Deaglán Ó Broin</u>)
- Submission on behalf of landowner (Cairn Homes PLC) advises that a fine urban grain requirement for individual buildings to be 'spatially independent' is not feasible on the basis of economic viability (requirement for individual lift/stair cores). It is also submitted that the maximum allowable frontage of 10 metres is overly prescriptive and inflexible (for retail, commercial and leisure uses) and should be omitted. (<u>DraftClonSDZ0351, Cairn Homes Plc,</u> Cairn Homes)
- 3. Submission from Clondalkin resident notes proposals in relation to a Clonburris Urban Square in terms of place making and uses. Queries are raised in relation to the capacity of the square, potential to hold events, evening uses, scale of hospitality uses, quality of the public realm, a monument, artistic features, outdoor facilities and the provision of narrow streets for retail and hospitality uses. It is emphasised that the square must be 'gotten right'. (DraftClonSDZ0358, Eoin Ó Broin)
- 4. Submission from NAMA suggests that the area over which the urban centre is located in CUC-S1 is extensive and covers the entire of the Development Area 1. It is suggested that the mixed use area defined in Figure 2.5.1 is reduced to omit the two western most blocks.

 (DraftClonSDZ0350, Deirdre O'Connor National Asset Management Agency, NAMA)
- 5. Submission welcomes that the provision and planning approval for fast-food outlets will be strictly controlled. The consideration of the Council of the effect of fast-food outlets from both a health and community point of view around our schools and parks is a most welcome policy statement. (<u>DraftClonSDZ0368</u>, <u>Frances Fitzgerald TD</u>)
- The maximum 10 metres plot width/frontage is overly prescriptive and would not facilitate typical retailers which would be attracted to the area. (<u>DraftClonSDZ0343, Everglade</u> <u>Properties Limited (In Receivership) Everglade Properties Limited (In Receivership),</u> Everglade Properties Limited (In Receivership))
- Submission on behalf of Everglade Properties Ltd (in receivership) outlines that the
 continued reference to a fine urban grain requirement is not necessarily compatible with
 high quality contemporary urban design appropriate to the town centre and appears overly
 prescriptive and such references should be omitted. (<u>DraftClonSDZ0343, Everglade</u>
 <u>Properties Limited (In Receivership) Everglade Properties Limited (In Receivership),</u>
 <u>Everglade Properties Limited (In Receivership)</u>)
- 8. Submission on behalf of Everglade Properties Ltd (in receivership) outlines that an initial study has indicated that the land area of Clonburris Urban Centre S1 is overly large for the proposed quantum of floorspace. It is suggested that the western most block of Clonburris Urban Centre S1 be omitted from the area with the densities remaining as achievable. Further studies would need to be undertaken to determine if overall densities can be achieved in Clonburris Urban Centre within the parameters of the block diagram and heights set out in the scheme.
 - It is suggested that this is examined further and clarified. (<u>DraftClonSDZ0343</u>, <u>Everglade Properties Limited</u> (<u>In Receivership</u>), <u>Everglade Properties Limited</u> (<u>In Receivership</u>), <u>Everglade Properties Limited</u> (<u>In Receivership</u>))





Chief Executive Response

The Chief Executive agrees with the submissions received in relation to the importance of the Clonburris Urban Centre becoming an active centre with a mix of uses and a central element of the area.

This is reflected in Section 2.4 Urban Centres of the Draft Planning Scheme, in particular the overarching principle, which states 'To develop vibrant mixed use centres around Clonburris and Kishoge railway stations as part of a hierarchy of urban centres to serve Clonburris.'

Additionally, Section 2.4.2 Place Making outlines that the urban centres in the Draft Planning Scheme will be critical in the creation of distinctive new places in Clonburris and ensuring that there are discernable focal points in the scheme to provide identity, amenities and facilities for the community. The urban centres at Clonburris and Kishoge are key elements in achieving the vision of this Planning Scheme which sets out to create a vibrant community offering a new way of living.

The Draft Planning Scheme provides the spatial framework for the assessment of the detailed design at planning application stage. It is considered that the contents of Section 2.4.2 Place Making, the Key Principles of Section 2.4, Section 2.4.3 Urban Design and the complementary Section 2.5 Retail provide an appropriate framework for the Retail Core of the Urban Centres, including providing policy guidance on quality of public realm and the mix of uses. Additionally, the Retail Cores are located immediately adjacent to the railways stations and will benefit from a high residential density, community urban hubs and commercial floorspace. These required land uses will provide for active and intensive usage of the area.

The importance of the Retail Core of the Urban Centres to the Draft Planning Scheme is reflected in the high level of preparation and inputs into the masterplanning of the area. The Planning Authority carried out an iterative process, involving a range of experts, to consider the masterplanning of the Planning Scheme, considering issues such as centre location, density, scale, orientation, heights, public realm, urban design, quantum of uses and phasing. The masterplanning of the Clonburris Retail Core provides a balance of orientation and scale to create a public square central to the Urban Centre and the Planning Scheme. This area will provide:

- The central public space and the focus of public life and activities in Clonburris.
- The focus for the social and economic life of Clonburris.
- A legible and distinctive focal space with associated pedestrian streets.
- Uncluttered central space, free of permanent features, to allow for range of activities in the space.
- Focal work of public art or monument with sitting opportunities.
- Strong evening economy.
- Public space with 24-hour access.

Further to the above, the Draft Planning Scheme includes for the provision of a fine urban grain at selected locations in the main squares of the Urban Centres. At Clonburris Retail Core, three block frontages to the square shall be selected for fine grain frontage. Figure 2.4.2 shows an indicative Plan for the Clonburris Retail Core, including indicative locations for fine urban grain that should be developed as terraces of individual and spatially-independent, mixed use buildings. This type of fine urban grain has been shown to be an important component of successful masterplanned urban centres. A fine urban grain will provide for smaller commercial footprints, which are attractive to

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smaller, independent businesses and are important to the development and sustenance of a mixed, local economy.

Further to the submissions outlining that the maximum plot width of 10m is overly prescriptive and would not facilitate typical retailers, it is outlined that this maximum frontage width is only applicable to the selected areas of fine urban grain. Urban blocks with a coarser urban grain will have the potential to provide for frontage in excess of 10m to accommodate typical commercial demands.

In conclusion, the Chief Executive considers that the issues raised have merit and are sufficiently addressed in the Draft Planning Scheme. Additionally, it is considered that the preparation methodology and urban design rationale for the layout and scale of the Retail Core at Clonburris Urban Centre are robust and the inclusion of fine urban grain and the creation of a public square are appropriate. The dimensions and layout of the public square in the retail core is comparable to College Green in Dublin.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.





Section 2.5 Retail

2.5.2 Retail

- 1. Objection to the increased pressure on local amenities and shops. (<u>DraftClonSDZ0270, Joan Johnson</u>)
- 2. Submission on behalf of landowner (Cairn Homes PLC) advises that retail floorspace figurers should be treated as gross figures and should relate to the definition contained in Annex 1 of the Retail Planning Guidelines and the definition of a 'shop' under the Planning and Development Regulations. It is also advised that there may be potential confusion in relation to non retail services' (also referred to as retail services in Planning Scheme) and it is suggested that the Planning Scheme should expressly exclude cafes/restaurants/bars and banking/financial institutions/professional services from retail uses. (<u>DraftClonSDZ0351</u>, <u>Cairn Homes Plc</u>, <u>Cairn Homes</u>)
- 3. It is important that any retail development proposed under this Planning Scheme should complement rather than detract from Liffey Valley which is a designated Major Retail Centre. (DraftClonSDZ0305, Tesco Ireland Limited, Tesco Ireland Limited)
- 4. It is of utmost importance that the Scheme is cognisant of the existing and permitted developments in the vicinity of the SDZ lands. In doing so, it is important that the designated SDZ lands be consistent with their role as a Level 3 Centre (District Centre) in the retail hierarchy. By ensuring that the amount of retail floorspace provided within the SDZ area is consistent with the level 3 designation this will help to protect the primacy of the nearby Level 2 Centre at Liffey Valley and the Level 3 Town Centre at Clondalkin. (DraftClonSDZ0305, Tesco Ireland Limited, Tesco Ireland Limited)
- 5. The Council should ensure that any retail developments within the Clonburris SDZ should not serve as retail destinations in their own right but should be scale appropriate to serve the new community at Clonburris. (DraftClonSDZ0305, Tesco/Ireland_Limited, Limited)
- 6. Submission from NAMA that the quantum of retail is a maximum but there appears to be an expectation that, as a minimum, the space will be delivered. Submission outlines that it will be difficult to secure 7,000 sqm of comparison space proposed.

 (DraftClonSDZ0350, Deirdre O'Connor National Asset Management Agency, NAMA)
- 7. Lidl wish to express their interest in locating a store or stores in the SDZ. The floorspace targets / caps for retail uses are somewhat prohibitive / restricted, in the context of the acknowledged need (in the Draft Planning Scheme and supporting Retail Study) for 'significant provision of convenience retailing in the catchment under the 2035 forecast scenario'.
 - The Planning Scheme should provide a greater degree of flexibility so as not to prejudice future planning applications within the area.

 (Draft Clans D70202 Lid Iroland CmbH, Lid Iroland CmbH,
 - (DraftClonSDZ0303, Lidl Ireland GmbH, Lidl Ireland GmbH, Lidl Ireland Gmbh)
- 8. The retail hierarchy of the proposed SDZ area is heavily balanced toward the proposed Clonburris Urban Centre with allowance for up to 16,520 sqm of retail floorspace. Whilst this would provide a substantial urban centre, provision / facilitation of Convenience Floorspace appears particularly limited with emphasis on a single large superstore, potentially implying that the provision of a mix of convenience facilities would not be appropriate.
 - Accordingly, the Planning Scheme should facilitate a higher level of retail floorspace in Kishoge Urban Centre, sufficient to enable the development of a viable and sustainable Level 4 Retail Centre, which current limits would in our opinion stifle.

(DraftClonSDZ0303, Lidl Ireland GmbH, Lidl Ireland GmbH, Lidl Ireland Gmbh)

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- 9. While the retail mix in Clonburris should not attract significant numbers of car journeys, it should be sufficient to prevent car journeys along the Fonthill Road the retail park and to Liffey Valley. In this regard, a major department store type buildings need to be provided around the train stations. (DraftClonSDZ0332, Paul Gogarty)
- 10. Submission on behalf of Everglade Properties Ltd (in receivership) supporting the maximum range of retail space of 21,520 sq. m provided in the Draft Planning Scheme on the basis that convenience and neighbourhood support uses are the primary occupiers. Submission requests that a quantum of retail is set within indicative ranges rather than solely a maximum with:
 - 1. An indicative range of 12,000 sq. metres to a maximum 21,520 sq. metres for the overall SDZ area
 - 2. An indicative range of 6,500 sq. metres to a maximum 12,920 sq. metres identified for Clonburris Urban Centre S1.
 - (<u>DraftClonSDZ0343</u>, <u>Everglade Properties Limited</u> (<u>In Receivership</u>) <u>Everglade Properties Limited</u> (<u>In Receivership</u>), <u>Everglade Properties Limited</u> (<u>In Receivership</u>))
- 11. The Eastern and Midland Regional Assembly submission states that the level of proposed retail floorspace is generally consistent with the Retail Strategy given the location within the metropolitan area of the GDA. It is suggested that the Planning Scheme should follow the Retail Strategy Guidelines in providing for retail formats at a commensurate level for the district catchment and as part of a retail hierarchy of lower order centres to serve local and neighbourhood catchments. (DraftClonSDZ0296, malachy bradley, Eastern and Midland Regional Assembly)
- 12. The planned expansion of Liffey Valley is supported at a national, regional and local level and realisation of its growth in line with its designation is a critical component of the planned vision for Dublin. Facilitating the growth of Liffey Valley and recognising its role in ensuring a balanced retail environment is particularly pertinent having regard to the planned growth of the nearby Clonburris SDZ scheme and will encourage shorter trip patterns.

 (DraftClonSDZ0337, Hines Real Estate Ireland Limited, Hines Real Estate Ireland Limited)
- 13. Requests that an integrated approach to the development of the SDZ lands in delivering a self-sustaining residential-led scheme that integrates seamlessly with neighbouring districts is achieved. In this regard, they welcome Retail Policy 6 Objective 2 of the County Development Plan, 2016-2022 which aims to 'ensure that the scale and type of retail offer in District Centres is sufficient to serve a district catchment, without adversely impacting on or drawing trade from higher order retail centre.' (DraftClonSDZ0337, Hines Real Estate Ireland Limited)
- 14. Concern around the emphasis placed on parts of Policy R6 Objective 3 of the County Development Plan. This Policy aims to 'support and facilitate the development of new District Centres of an appropriate 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.' Any policy which encourages department sized stores at a lower order centre proximate to Liffey Valley is not feasible in retail planning terms. (DraftClonSDZ0337, Hines Real Estate Ireland Limited, Hines Real Estate Ireland Limited)
- 15. The strategic importance of the Level 2 Liffey Valley Centre should be noted and request that future retail developments within the SDZ have regard to the plan led growth of Liffey Valley which has the potential to reduce trip distances and unsustainable patterns of movement. In this regard, retail developments under this SDZ Scheme should be scale appropriate to serve the new community at Clonburris and should not serve as retail destinations in their own right. (DraftClonSDZ0337, Hines Real Estate Ireland Limited, Hines Real Estate Ireland Limited)





 Social facilities and services are required such as Cinema, Theatre, Cafes, Bars, Restaurants, Post Office, Credit Union, Accessible Banking and local shops. (<u>DraftClonSDZ0504, South Dublin County PPN, South Dublin County Public Participation Network</u>)

Chief Executive's Response

The Chief Executive notes the content of the submissions on retail provision in the Draft Planning Scheme. The Retail Planning Guidelines for Planning Authorities, DECLG (2012) and the Retail Strategy for the Greater Dublin Area, Regional Planning Guidelines Office (2008) form the basis for retail planning in the Greater Dublin Area (GDA).

Clonburris SDZ District Centre is designated as a Level 3 District Centre in the South Dublin County Council Development Plan 2016-2022. The County Development Plan outlines that these centres will vary both in the scale of provision and size of catchment depending on proximity to a major town centre but a good range of comparison shopping would be expected (though no large department store), some leisure activities and a range of cafés and restaurants and other mixed uses. They should contain at least one supermarket and ancillary foodstores alongside financial and other retail services. District Centres should generally cater for a population of 10,000-40,000 people. This policy context informs the accompanying Retail Study for the Clonburris Draft Planning Scheme. The prepared Retail Study follows a qualitative and quantitative evidence based methodology in relation to the retail provision in the Draft Planning Scheme. It is considered that the maximum quantum permitted in the Draft Planning Scheme is scale appropriate to a District Centre and will complement the established centres at Clondalkin and Liffey Valley.

The Retail Study prepared to inform the Draft Planning Scheme indicates that there is limited capacity for further comparison floorspace within the catchment after the build out of the SDZ areas and it is only of a scale that is commensurate with a district centre. Clonburris should provide a lower scale and mixed provision of shops that would mainly satisfy day-to-day needs of the resident population with limited lower to middle order comparison retailing. The retail capacity assessment and the dominance of Liffey Valley indicates that a comparison floor space element of Clonburris will not serve the area beyond the catchment and will be principally in the form of a close association with a convenience anchor.

It is noted that some submissions have commented that the convenience floorspace appears particularly limited with emphasis on a single large superstore, potentially implying that the provision of a mix of convenience facilities would not be appropriate. The Chief Executive considers that the provision of one supermarket is the minimum requirement in the Retail Cores of Kishoge and Clonburris to provide for the emerging population and encourage sustainable transport patterns. The Draft Planning Scheme provides for retail provision of up to 21,520 gross sqm and as such, there is considerable scope for additional retail provision above the minimum of one supermarket in each centre.

In relation to the submission requesting a minimum range of retail provision, it is considered that a minimum quantitative value for retail provision in the Draft Planning Scheme is not warranted. The Draft Planning Scheme recognises the importance of convenience retail to the quality of life of the resident population and includes a minimum provision of one supermarket in each of Kishoge and Clonburris. The provision of same is provided for in the phasing.

In terms of the balance of retail provision between Kishoge Retail Core and Clonburris Retail Core, the Chief Executive considers that the proposed split is appropriate due to the assigned District Centre and Local Centre retail functions of the centres. Additionally, the overall vision of the Scheme provides for Clonburris Urban Centre as the primary urban centre for the population. The location of





two retail centres of a similar retail order and retail offer within close proximity of each other would also be at variance with the Guidelines for Planning Authorities on Retail Planning (2012) in terms of competition, vitality and viability. Furthermore, it is advised that the SDZ lands have been designated for only one District Centre under the Retail Strategy for the Greater Dublin Area 2008 – 2016 and the South Dublin County Council Development Plan 2016 – 2022.

The Chief Executive notes the submission relating to potential confusion in relation to non retail services' (also referred to as retail services in Planning Scheme). It is considered that additional text be added and reference to non retail services be removed from the Draft Planning Scheme to clarify. The Retail Study provides an indicative breakdown of the 21,520 sqm maximum retail provision into comparison, convenience and retail services. It is noteworthy that retail services account for 6,000 gross sqm of the maximum provision and as such, uses such as hairdressers, bookmakers, coffee shops, etc. are included in the retail provision. In the context of this submission, it is considered that additional text should be added to Section 2.5.7 Applications for Retail Development to include reference to the Retail Study and the breakdown of floorspace into convenience, comparison and retail services.

In a retail context, the Chief Executive notes the submission on the need for services such as Cafes, Bars, Restaurants, Post Office, Credit Union, accessible banking and local shops. It is considered that the Draft Planning Scheme provides a policy framework for the sustainable delivery of these services and will facilitate their provision within the identified centres.

Chief Executive Recommendation

It is recommended that the text in Section 2.5.7 Applications for Retail Development be amended and the terminology in the Draft Planning Scheme in relation to retail services/ non-retail services, including minor amendments to text as follows:

a). Table 2.1.6 – Delete the word 'non' from Table title. Retail and Non-Retail Services (Gross Sqm)

b). Section 2.2.3

This Planning Scheme also seeks to ensure that all residential development will also be afforded direct or indirect access to dedicated pedestrian and cyclist routes to schools and local facilities especially parks, open spaces, public transport, retail and non-retail services.

c). Section 2.8 Design Statements

To ensure coherency and quality in design, all medium to large scale development proposals on the SDZ lands (Landmark Buildings, 10 dwellings or more in the case of residential development or development of over 1,000 sq.m in the case of employment or retail/ non-retail services development) shall be accompanied by a Design Statement.

d). 2.5.3 Clonburris Urban Centre - Core Retail Area

Gross floor area up to a maximum of 12,920 sqm shall be provided within Clonburris Core Retail Area. It should accommodate a minimum of one large supermarket, with supporting comparison goods floor area. Retail services, Community, leisure, employment, civic and cultural uses should be provided in addition to retail.

e). 2.5.7 Applications for Retail Development

Applications for new retail development shall accord with the requirements outlined in the Planning Scheme in addition to the following criteria:





Planning applications for retail development shall provide a general breakdown of retail floorspace to be provided and should have regard to the accompanying Retail Study and the indicative breakdown of floorspace into convenience, comparison and retail services.

Strategic Environmental Assessment of Chief Executive's Recommendations No interaction with Strategic Environmental Objectives.

Appropriate Assessment Screening of Chief Executive's Recommendations

No significant adverse impacts on European sites within the SDZ's zone of influence are predicted.

2.5.5 Local Nodes

- Submission on behalf of landowner (Cairn Homes PLC) queries the need for two local nodes (Clonburris South West and Kishoge South East) within close proximity of each other and the two Urban Centres. It is suggested that the two nodes be co-located as one larger node at Clonburris South West (Retail - 1,000 sq.m Gross, Non Retail - 500 sq.m Gross, Community -2,000 sq.m Gross). The viability of the scale of retail development at local nodes is also queried and it is suggested that 500 sq.m net should be permissible to sufficiently accommodate a convenience retail store. (<u>DraftClonSDZ0351, Cairn Homes Plc, Cairn Homes</u>)
- 2. Submission from NAMA that the distribution of retail space in local nodes will not be viable (DraftClonSDZ0350, Deirdre O'Connor National Asset Management Agency, NAMA)
- 3. The proposed 300 sqm retail sales area of 4 no. 'local nodes' in the SDZ area is particularly limited.

As noted the SDZ area will accommodate a large population with a large retail floorspace requirement. In this regard, the 'local nodes' would each be anticipated to cater for relatively substantial requirements, and could accordingly be provided with greater flexibility in terms of scale, i.e. to contain small supermarkets up to 1,000 sqm net retail sales area. This would enable residents to minimise travel to service their basic food shopping requirements, whilst still being of a relatively limited scale so as to maintain the primacy of the Kishoge and Clonburris Urban Centres.

(DraftClonSDZ0303, Lidl Ireland GmbH, Lidl Ireland GmbH, Lidl Ireland Gmbh)

Chief Executive's Response

The Scheme identifies 4 Local Nodes at Grange, Cappaghmore, Clonburris Little and Gallanstown to accommodate a range of local uses, including local retail provision. The location and number of local nodes within the Draft Planning Scheme were carefully considered in the co-ordinated masterplanning process and are fully integrated into the land use and transportation planning of the area. The proposed locations are accessible to the surrounding residential catchment by sustainable modes, are adjacent to primary open space and proximate to school sites. The locations of strategic open space, school sites and the local nodes provides for a cluster of uses that will enable sharing of facilities and shared travel demand. In this context, the Chief Executive considers that the location and number of local nodes should not be amended. Furthermore, the viability of the centres will be enhanced by the proximity of residential units and the permeability of the urban form.

A few submissions have raised concerns regarding the viability of the retail component of the local nodes, in particular the 300 sqm retail sales area maximum. In this context, it is relevant that Section 2.1.4 Extent of Development facilitates the transfer of non residential floorspace between Development Areas, subject to criteria being satisfied. It is considered that the 300 sqm retail sales area maximum is appropriate to accommodate a small/ mid-sized foodstore (e.g. Centra or Spar) to





provide local top up shopping options for residents in the immediate catchment. It is accepted that the gross retail area for the local nodes, delineated as Gross Retail Area in Clonburris SW, Clonburris NW, Kishoge SW and Kishoge SE development areas are restrictive to enable accompanying retail services to convenience floorspace. As such, it is recommended that the maximum gross floor area as shown in Table 2.1.6, Table 2.5.1 and Table 2.13.1 be increased for the development areas containing the local nodes. An additional 250 sqm of retail is recommended to be added to each local node. This approach would be consistent with the indicative breakdown in the Retail Study and the general assumptions on retail services in Section 4.5 of the Retail Study.

Chief Executive's Recommendation

It is recommended that the Draft Planning Scheme be amended to add 250 sqm of Gross Retail Area to the local nodes in each of Clonburris SW, Clonburris NW, Kishoge SW and Kishoge SE. Amendment to include alterations to Table 2.1.6, Table 2.6.1, Table 2.13.1, Table 3.3.3, Table 3.3.5, Table 3.3.8, Table 3.3.9 in the document.

Clonburris South West
Retail Development – 400 sqm 650 sqm
Clonburris North West
Retail Development – 400 sqm 650 sqm
Kishoge South West
Retail Development – 300 sqm 550 sqm
Kishoge South East
Retail Development – 400 sqm 650 sqm

Strategic Environmental Assessment of Chief Executive's Recommendation

No interaction with Strategic Environmental Objectives.

Appropriate Assessment Screening of Chief Executive's Recommendation

No significant adverse impacts on European sites within the SDZ's zone of influence are predicted.

2.5.7 Applications for Retail Development

- Submission on behalf of landowner (Cairn Homes PLC) requests that the requirement to carry out a Retail Impact Assessment for 'major' retail developments over 1,000 sq.m should be removed and the basis that retail development has already been allocated under the Planning Scheme and Clonburris has been identified as a District Centre under the County Retail Hierarchy. Reference is also made to the provision under the Retail Planning Guidelines in relation to cases where retail assessment is not required including where policies and objectives are complied with. (<u>DraftClonSDZ0351, Cairn Homes Plc, Cairn</u> Homes)
- 2. Welcomes the criteria for new retail developments as set out in the Section 2.5.7 of the Draft Planning Scheme, which require major retail proposals (exceeding 1,000 sqm) to provide a detailed Retail Impact Assessment (RIA) and Design Statement. The requirement for significant retail proposals to undertake an RIA will allow the Council to make an informed decision on retail impact based on up to date information regarding all existing and committed floorspace within the Scheme and surrounding catchment area. (DraftClonSDZ0305, Tesco Ireland Limited, Tesco Ireland Limited)
- 3. The Planning Scheme could require the preparation of detailed Retail Impact Assessments, which would provide adequate control to prevent excessive retail development, hence the Planning Scheme should allow for greater flexibility. (DraftClonSDZ0303, Lidl Ireland GmbH, Lidl Ireland Gmbh)





4. Welcomes the requirement set out in Section 2.5.7 of the Draft Scheme, for major retail proposals (exceeding 1,000 sqm) to provide a detailed Retail Impact Assessment (RIA) and Design Statement. The requirement for significant retail proposals to undertake an RIA will allow the Council to make informed decisions on the retail impact with respect to established centres, based on up to date information regarding all existing and committed floorspace within the Scheme and surrounding catchment area. (DraftClonSDZ0337, Hines Real Estate Ireland Limted, Hines Real Estate Ireland Limited)

Chief Executive's Response

The Chief Executive notes the diverging views on the inclusion of the requirement for a Retail Impact Assessment (RIA) for retail planning applications. The Draft Planning Scheme provides for same in Section 2.5.7. The purpose of a RIA is to demonstrate compliance with the development plan/ Planning Scheme and that there will not be a material and unacceptable adverse impact on the vitality and viability of any existing centre. This is a matter for careful technical assessment and professional judgement. The retail provision in the Draft Planning Scheme provides for a maximum retail allocation for the entire SDZ lands and a breakdown of gross floor area by Development Area. The Retail Study outlines an indicative breakdown of convenience, comparison and retail services for the 21,520 sqm allocation, however, this information is not included in the Draft Planning Scheme to enable flexibility of provision by the market. As such, it is considered necessary to require a Retail Impact Assessment for individual retail proposals. Furthermore, the Draft Planning Scheme is a medium to long term plan and up to date information should be supplied with each application.

In relation to the inclusion of reference to the sequential approach, it is considered that the masterplanning process had regard to this principle in identifying the retail centres in terms of accessibility, urban hierarchy and movement. An amendment to Section 2.5.7 is recommended to remove the requirement to demonstrate the sequential approach for applications with the Retail Core Areas.

Chief Executive's Recommendation

It is recommended that the Draft Planning Scheme be amended in respect of the requirement to demonstrate the sequential approach for retail proposals in the Retail Core areas as follows:

2.5.7 Applications for Retail Development

Applications for new retail development shall accord with the requirements outlined in the Planning Scheme in addition to the following criteria:

Retail development should be in accordance with the fundamental objective to support the vitality and viability of the retail centre and must demonstrate compliance with the sequential approach. Proposals to amalgamate retail units will be carefully considered.





Section 2.6 Economic Development

2.6.2 Location of the Employment Floorspace within the Scheme

- Submission on behalf of landowner (Cairn Homes PLC) requests clarity in relation to whether
 there is an upper limit for employment floorspace. It is also requested that provision be
 made to for the non-residential floorspace allocation in the Kishoge and Clonburris Urban
 Centres to be transferred to a residential use in the event there is no demand.
 (DraftClonSDZ0351, Cairn Homes Plc, Cairn Homes)
- 2. Submission from NAMA outlines that the absence of pure office/ commercial would not dilute the ability to plan for a successful new residential community and outlines that office/ commercial are not amongst the key ingredients for a sustainable residential development in the Sustainable Residential Development in Urban Areas. Submitted that the approach of no employment development would not dilute the place making concept. Submission requests that additional text be added to the scheme to ensure flexibility to facilitate commercial space should a demand emerge. The text would insert a substitution clause to allow residential use in place of employment / commercial floorspace within the Urban Centres. (DraftClonSDZ0350, Deirdre O'Connor National Asset Management Agency, NAMA)
- 3. Submission outlines that the distribution of commercial space to the local nodes will have implications for viability. (<u>DraftClonSDZ0350</u>, <u>Deirdre O'Connor National Asset Management Agency</u>, NAMA)
- 4. Submission on behalf of Everglade Properties Ltd (in receivership)considers that the current proposed quantum of c. 31,000 sq. m employment floorspace is excessive, and our client does not envisage that there will be demand for office type accommodation for enterprise / business occupiers within the SDZ. Submission requests a reduced quantum and is of the view that a range of other potential uses are identified as options for meeting the employment and/or community space requirements such as hotel, leisure centre and healthcare related uses. (DraftClonSDZ0343, Everglade Properties Limited (In Receivership) Everglade Properties Limited (In Receivership), Everglade Properties Limited (In Receivership))
- 5. The Eastern and Midland Regional Assembly submission states that the proposed Draft Planning Scheme is generally consistent with the Regional Planning Guidelines for the Greater Dublin Area, which supports the development of the Dublin city region Gateway as a focus for economic activity. (DraftClonSDZ0296, malachy bradley, Eastern and Midland Regional Assembly)
- 6. If the employment density was used wisely, as in Dublin City centre, this area has the potential to accommodate up to 250,000 jobs. Road users from the countryside or outside this corridor would come just to the outskirts of the city and back home on great roads and they would not add to congestion further. Users from inside this corridor utilize road space to get to this corridor thereby further reducing congestion by driving county rush hour flow. (DraftClonSDZ0506, Tom Newton DraftClonSDZ0507, Caitriona McClean)

Chief Executive's Response

The submission content in relation to economic development and employment floorspace is noted. In preparation of the Draft Planning Scheme, the Planning Authority prepared an Employment Floor Area Demand Study to inform the quantum and type of commercial floorspace. The Study accompanies the Draft Planning Scheme and recommends that the Draft Planning Scheme should accommodate 30,000 sqm of commercial floorspace. The policy context, economic growth, public transport accessibility, road infrastructure, supply, vacancies and sector demands were considered to inform the recommendation. In relation to the provision of a maximum for employment floorspace, the Draft





Planning Scheme does not provide an upper limit. The building heights, frontages and block structure of the Draft Planning Scheme provide spatial parameters for the level of floorspace achievable in the urban centres.

A submission outlines that a range of other potential uses are identified as options for meeting the employment and/or community space requirements such as hotel, leisure centre and healthcare related uses. Section 2.6.3 Employment Floorspace includes the text 'Commercial uses such as hotels, hostels, bed and breakfast, funeral homes, public houses, nursing homes, garden centres, conference centres and healthcare facilities etc. are generally permitted in principle in the Urban Centres.' It is accepted that the link between this section of text and the 31,115 sqm is not clear enough and open to interpretation. Additional text to clarify that these uses can assist in achieving the 31,115 sqm of commercial floorspace is recommended.

The proposals for provision to be made for the non-residential floorspace allocation in the Urban Centres to be transferred to a residential use in the event there is no demand and the omission of employment floorspace are acknowledged. The Planning Scheme provides for up to 9,192 units, a minimum of 31,115 sqm commercial, a minimum of 7,300sqm community and a maximum of 21,520 sqm retail across the SDZ lands. It is considered that this provision provides for a balanced mixed use area and will create a vibrant community with living and employment options. The commercial floorspace provision in the Draft Planning Scheme is informed by the Employment Floor Area Demand Study. It is envisaged that the Draft Planning Scheme is a medium to long term project and it is noteworthy that the demand for floorspace is projected to increase based on the planned improvement in public transport infrastructure. In this context, it is considered that substituting employment floorspace due to the absence of demand is short sighted and would impact on the sustainable transport patterns projected for the area and the overall vision of the area as a vibrant community offering choice. The Draft Planning Scheme includes for a review of the Scheme as part of Phase 2 and this issue should be monitored and assessed in that process.

Additionally, the Draft Planning Scheme provides scope to substitute residential units for commercial floorspace at Kishoge South West in Section 2.1.4 Extent of Development, subject to criteria.

Chief Executive's Recommendation

It is recommended that Section 2.6.3 of the Draft Planning Scheme be amended to specifically state that commercial uses such as hotels, hostels, bed and breakfast, funeral homes, public houses, nursing homes, garden centres, conference centres and healthcare facilities etc. will form part of meeting the 31,115 sqm minimum employment floorspace in the Draft Planning Scheme as follows:

2.6.3 Employment Floorspace

Commercial uses such as hotels, hostels, bed and breakfast, funeral homes, public houses, nursing homes, garden centres, conference centres and healthcare facilities etc. are generally permitted in principle in the Urban Centres and will form part of meeting the minimum employment floorspace in the Draft Planning Scheme. Other uses will be considered on a case by case basis having regard to the projected employment, employment per sq. metre, the nature of the use and compliance with the Planning Scheme.

Strategic Environmental Assessment of Chief Executive's Recommendation

No interaction with Strategic Environmental Objectives.

Appropriate Assessment Screening of Chief Executive's Recommendation

No significant adverse impacts on European sites within the SDZ's zone of influence are predicted.





2.6.3 Employment Floorspace

- Submission raises concern in relation to the sufficiency of provision for small to medium enterprise/light Industry for local employment and the potential for exacerbating commuting and traffic congestion. It is advised that the area on the west side of the SDZ lands, south of the railway line, is the ideal location for Enterprise/light Industry by reason of its location between two existing business parks and the potential to create an enterprise belt. (<u>DraftClonSDZ0216, LIONA O'TOOLE</u>)
- 2. A firm commitment should be given to developing a SME (Small to medium enterprise)centre to encourage development and growth in the area (<u>DraftClonSDZ0233, Cllr Francis Timmons</u>)
- 3. Joint submission from local representatives requests that there be provision for an enterprise centre for local and incubator businesses. (<u>DraftClonSDZ0419</u>, <u>Cllr. Emer Higgins</u>, <u>Cllr. Vicki Casserly & Cllr. Kenneth Egan</u>)
- 4. Submission is pleased that plans are included for commercial development, in particular for the provision of employment/training floorspace and enterprise units targeted at small and medium businesses. Every opportunity should be made to provide employment for residents locally and any further incentives for small, medium and large businesses should be considered in future stages of the development and in consultation with frontline services such as the Local Enterprise Office and local Chambers of Commerce. Clonburris' location allows for great economic and employment opportunities. However, it is important that the current work and commuting trends in the wider West of Dublin area are considered. (DraftClonSDZ0368, Frances Fitzgerald TD)
- 5. The Planning Scheme needs to cater for a greater and wider mix of employment opportunities within the SDZ lands. The 2008 SDZ plan on part of these lands had approximately nine times as much emphasis on employment and economic development opportunities within its boundaries. Even allowing for the reduced density of this plan, there appears to have been a failure of vision to allow people to work in or close to where they live. Enterprise hubs and business centres, more service provision type opportunities, e.g. accountants, solicitors, physiotherapists, etc., with options for some home-based enterprises or living "above shop" type developments. These have been slow to develop organically in parts of Adamstown but need to be thought about from day one in Clonburris, at least in terms of building and site provision. (DraftClonSDZ0332, Paul Gogarty)
- 6. Submission outlines that a Local Enterprise Office and INTREO centres should be constructed as part of the development together with a community enterprise centre (DraftClonSDZ0502, Ed O'Brien & John Curran TD, Fianna Fail Dublin Mid West)
- 7. Submission outlines that the plan should do all possible to attract large scale sustainable employment enterprises to the retail core in keeping with aim of a self-contained development and to discourage car journeys. (DraftClonSDZ0502, Ed O'Brien & John Curran TD, Fianna Fail Dublin Mid West)
- 8. Submission outlines need for local jobs and suggests a Post office might help. (DraftClonSDZ0500, Declan Hanley)

Chief Executive's Response

The Chief Executive notes the content of the received submission relating to the provision of enterprise floorspace. The Draft Planning Scheme provides a spatial framework for the development of the SDZ lands. The Scheme outlines the extent of development permissible in the area and includes for the required provision of employment floorspace. The approach is supported by an evidence basis established through the Employment Floor Space Demand Study.





Section 2.6.3 Employment Floorspace outlines the following as target sectors for the floorspace:

- Office and business premises for local employers in financial, professional services, insurance, legal services, property services, software and service start-up;
- Small flexible business premises; and
- Support services to the industries located in the technological crescent zone from Citywest to Grangecastle Castle Business Park.

Additionally, the Draft Planning Scheme includes guidance on the form of the employment floorspace to cater for small and medium sized expanding businesses. As a minimum, 10% of the employment floorspace provided in the Urban Centres shall be in the form of small-medium sized units/incubation units of between 100 - 200sq.m.

Section 2.6.3 of the Planning Scheme supports enterprise/training floorspace to facilitate the development of a range of employment and enterprise opportunities in Clonburris. Any enterprise/training space should take the form of a purpose built facility located at Kishoge or Clonburris. Additionally, Section 2.1.4 of the Planning Scheme provides flexibility for the substitution of residential units for further employment floorspace at Kishoge South West. This flexibility is included on the basis of the potential to complement uses within Grange Castle Business Park and benefit from the advantageous location between Kishoge Railway Station and Grange Castle Business Park.

Noted that a submission outlines that more service provision type opportunities, e.g. accountants, solicitors, physiotherapists, etc., with options for some home-based enterprises or living "above shop" type developments be provided. The Draft Planning Scheme includes for Home Working under Section 2.6.5. This Section states that 'small scale home based economic activity offers flexibility to self-employed persons and employees. This can contribute to a decrease in the demand for travel and reduce the costs associated with starting a business. The Planning Scheme supports and encourages the provision of ground floor purpose built live-work units as part of mixed use and residential developments in appropriate locations, as a means of enlivening streets and to provide flexible accommodation for small businesses.' Additionally, the maximum retail provision of 21,520 sqm accounts for retail services and as such, opportunities for uses such as hairdressers, bookmakers, coffee shops, etc. are included within the retail provision floorspace.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.





Section 2.7 Community Facilities

2.7.2 Community Buildings

- 1. There is insufficient amenities to cater for the large population of Clonburris. (DraftClonSDZ0153, Johanne Ryan)
- 2. There are no new community facilities. (<u>DraftClonSDZ0310</u>, <u>Orla Flanagan</u>)
- 3. There is a need for facilities to hold meetings, classes, and sports events. There is also a need for opportunities for young people to get involved in activities such as computer clubs, Scouts/Guides, music and arts. Gangs, violence and anti-social behaviour will plague the area otherwise. (DraftClonSDZ0055, Ellen Ward)
- 4. Submission outlines that Lucan currently has no community centres. Community facilities are desperately needed and this plan could have been made somewhat more palatable through the inclusion of such facilities, but no nothing. (<u>DraftClonSDZ0402, Anna O'Neill</u>)
- 5. Concern is raised as to whether proposed community facilities will actually be delivered. Will the planned new swimming pool at Lucan be expected to serve the population of Lucan, Adamstown and Clonburris? The knock on effects of this could be anti-social behaviour and limitations on what groups can provide due to lack of space. (DraftClonSDZ0221, Elaine Hurley)
- A sports centre with a community pool are required to serve the local population.
 A community centre is required for local groups to use.
 A scout den is required as part of the development.
 (DraftClonSDZ0229, lisa rodgers)
- Plans for leisure facilities have not been fully delivered in Lucan and Adamstown, concern is expressed that Clonburris will have the same outcome. (<u>DraftClonSDZ0251</u>, <u>Amanda</u> <u>O'Sullivan</u>)
- Multi-purpose community buildings are scarce in this plan and need to be increased and more clearly identified in the scheme. Community facilities also need to be phased into the scheme at an earlier stage.
 (DraftClonSDZ0332, Paul Gogarty)
- 9. In order to create a thriving community, facilities and services must be provided in conjunction with the construction of housing units so as not to have a negative impact on existing services such as schools and community facilities. (DraftClonSDZ0308, Madeleine Johansson, People Before Profit)
- 10. A community centre could be located on the corner of Griffeen Avenue and the outer ring road. The car park for which could be used during the mornings by parents of Griffeen Educate Together (<u>DraftClonSDZ0434</u>, <u>Nathaniel Doyle</u>)
- 11. The proposed 7,300sqm community floor space is noted and welcomed however these should be occupied by public services such as
 - Needs of the area (crèche, older adults, youth services, outreach services)
 - Voluntary community groups (Girl Guides/Scouts, community council, women & mens groups)
 - Community gym and swimming pool
 - Seasonal activities (summer camps and kids clubs)
 (<u>DraftClonSDZ0504</u>, <u>South Dublin County PPN</u>, <u>South Dublin County Public Participation Network</u>)
- 12. Submission welcomes the provision of clusters of community facilities and services such as a community centre, heath-care and child-care facilities and local amenities such as playgrounds, sports pitches and allotments. The provision of community facilities must run in tandem with the development of housing; community facilities cannot be left until the end phase of the development. (DraftClonSDZ0368, Frances Fitzgerald TD)





- 13. Submission welcomes the Urban and Park Hubs and believes these will be of great benefit to the community in Clonburris. (<u>DraftClonSDZ0368</u>, <u>Frances Fitzgerald TD</u>)
- 14. Lucan and Adamstown are overpopulated at the moment. The community is severely underserviced in terms of provisions of health care facilities, community service facilities, provisions for local clubs and voluntary organisations.
 Concern is expressed that the Clonburris SDZ will suffer from insufficient community facilities.
 (DraftClonSDZ0381, Brian Murray)
- 15. Concern is raised that future Clonburris residents will struggle with limited community facilities. (DraftClonSDZ0386, Kinga Drozdz)

Chief Executive's Response

The Chief Executive acknowledges the submissions received in relation to community facilities. A number of submissions welcome the provision in the Draft Planning Scheme in relation to the quantum, the Urban and Park Hubs and the clusters of community facilities and services such as a community centre, heath-care and child-care facilities and local amenities such as playgrounds, sports pitches and allotments.

A number of submissions outline that there are no community facilities provided for in the Draft Planning Scheme. The Chief Executive outlines that it is an overarching principle of the Draft Planning Scheme to facilitate the balanced provision of community facilities and services for the residents of Clonburris to promote health and well-being, social inclusion and quality of life. The Scheme provides for a minimum of 7,300 sqm of community floorspace, including a minimum of 2,500 sqm multi-functional space in Clonburris Urban Centre. The Chief Executive envisages a scale of provision equivalent of Rua Red in Tallaght at the heart of the Clonburris Urban Centre. The minimum floorspace for community provides sufficient scope for other facilities such as a library.

Additionally, Park Hubs are designated to correspond to the local nodes at Grange, Clonburris Little, Cappagh and Gallanstown and are located adjacent to open space provision. The Park Hub designation facilitates complementary floorspace required for the adjacent park such as changing rooms, meeting rooms etc. A district level provision of recreation facilities shall be located adjacent to Barony Park South as part of the Clonburris Little Local Node. This facility may be shared with schools and should accommodate meeting rooms, sports hall, changing rooms, playground & flexible community space in a purpose built building(s) of a minimum gross floor space of 1,500 sqm. The Park Community Centre at Ballycullen or the planned sports hall at Adamstown would be examples of a similar sized facility. The provision of the Park and Urban Hubs is linked to the provision of the residential units through the Phasing Programme.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.

2.7.3 Other Community Facilities

- The Clonburris SDZ needs a fire brigade and a police station. (<u>DraftClonSDZ0029</u>, <u>Alan</u> Johnson)
- 2. The proposed Fire Station is welcomed and should be provided as soon as possible.

 The proposed Primary Health Care Centre is welcomed and should be provided in an early phase of development. (<u>DraftClonSDZ0050</u>, <u>Pamela Corrigan</u>, <u>Labour Party Clondalkin</u>

 <u>Branch/ Dublin Mid West</u>)





- 3. There is no proposed fire station, Garda station or community centre. (<u>DraftClonSDZ0051</u>, Brendan Keenan)
- 4. Eight primary schools are proposed for the area, three of which are already at full capacity. (DraftClonSDZ0051, Brendan Keenan)
- 5. Submission strongly object to this proposal, it makes no allowances for already established communities in the area. All facilities in the current areas are at capacity, including schools. Lucan East ETNS and Griffeen Valley ETNS are full, require further facilities including playing fields and parking, and I note they are included in the overall schools plan. (DraftClonSDZ0007, Jennifer Byrne)
- 6. Submission strongly object to this proposal, it makes no allowances for already established communities in the area. All facilities in the current areas are at capacity, including community facilities no pool, need new community centre, tiny youth club at Griffeen Centre. (DraftClonSDZ0007, Jennifer Byrne)
- 7. Submission notes there is no plan here for a new Garda station. Currently high levels of anti social behaviour in Lucan/Clondalkin, 2 Garda stations under strain in Lucan Village and Ronanstown. (<u>DraftClonSDZ0007</u>, <u>Jennifer Byrne DraftClonSDZ0040</u>, <u>Foxborough Residents Group Lucan</u>, <u>Foxborough Residents Group</u>)
- 8. Submission on behalf of Ahmadiyya Muslim Association advises that the absence of community hall /sports centre in Adamstown and the surrounding area has restricted the activities of the Ahmadiyya Muslim Association. It is requested that consideration be given in relation to the Fosset Circus Site on the SDZ lands, which has been bought for the purpose of building an Islamic Cultural Centre (mosque, community hall, and a sports centre). Additionally, some submissions advise that the Planning scheme should be inclusive of transport, services, amenities and facilities to support new development. General concerns are also raised in some submissions in relation to transport, building heights, fire services and policing facilities. (DraftClonSDZ0048, Najia Malik DraftClonSDZ0061, Amtul Hafeez DraftClonSDZ0065, IFTIKHAR AHMAD DraftClonSDZ0066, AMJAD MAHMOOD AHMAD DraftClonSDZ0067, Asad Iftikhar DraftClonSDZ0068, Muhammad Ahsan DraftClonSDZ0069, Razia Begum DraftClonSDZ0047, Tayyaba Mashood DraftClonSDZ0091, M Ahmed DraftClonSDZ0092, QuratUI Ain DraftClonSDZ0081, shamifa Zaheer DraftClonSDZ0085, Rizwan Ahmad DraftClonSDZ0086, Saliha Asad DraftClonSDZ0087, Shama Asad DraftClonSDZ0093, Rafiq Ahmed DraftClonSDZ0095, imdad ch DraftClonSDZ0130, Rubina Nusrat DraftClonSDZ0129, Daulat Bibi DraftClonSDZ0128, Khalida Parveen DraftClonSDZ0089, Amna Nadeem DraftClonSDZ0127, Sajida Aleem DraftClonSDZ0126, Shazia Abbas DraftClonSDZ0125, Tuba Abbas DraftClonSDZ0090, khizar hayat DraftClonSDZ0124, Maryam Abbas DraftClonSDZ0123, Khadija Begum DraftClonSDZ0122, Quratulain Habib DraftClonSDZ0121, shamim Ashraf DraftClonSDZ0074, ABDUL RAUF KHAN DraftClonSDZ0075, QuratUI Ain DraftClonSDZ0076, Rafiq Ahmed DraftClonSDZ0077, QuratUI Ain DraftClonSDZ0078, M Ahmed DraftClonSDZ0080, sikandar ch DraftClonSDZ0112, Aleem Uddin DraftClonSDZ0160, Daniyal Ahmed DraftClonSDZ0158, ambreen rauf DraftClonSDZ0155, Tariq Shaikh DraftClonSDZ0151, Hafiz Ahkhtar Rashid DraftClonSDZ0114, Fareeha Aleem DraftClonSDZ0115, Sehrish Zahoor DraftClonSDZ0120, Muhammad Ishaq DraftClonSDZ0116, Zahid Kamran DraftClonSDZ0118, Afshan Kamran DraftClonSDZ0119, sukhan gul DraftClonSDZ0117, Maiza Kamran DraftClonSDZ0131, Noma Akhter DraftClonSDZ0132, Shafia Begum DraftClonSDZ0133, Amtul Hayee DraftClonSDZ0134, Humayun Malik DraftClonSDZ0135, Shehla Akhter DraftClonSDZ0136, Baria Maryam DraftClonSDZ0137, Sumaira Malik DraftClonSDZ0138, Mariam Ishaq DraftClonSDZ0139, faiza Tul-Aleem <u>DraftClonSDZ0172</u>, <u>Aisha Humayun</u> <u>DraftClonSDZ0058</u>, <u>Samra Nisa</u> <u>DraftClonSDZ0059</u>, Abbas Ahmed Dogar <u>DraftClonSDZ0060</u>, Rabeeb Ahmed Mirza DraftClonSDZ0104, nusrat un nisa DraftClonSDZ0105, nusrat un nisa DraftClonSDZ0109, Nadeem Amjad DraftClonSDZ0141, Habib Ahmad DraftClonSDZ0142, Jamal Ahmed





DraftClonSDZ0144, Sadia Saleem DraftClonSDZ0145, Shahida Parveen DraftClonSDZ0146, Najma Nadeem DraftClonSDZ0147, Sadia Saleem DraftClonSDZ0148, Shahida Parveen DraftClonSDZ0149, Hiba Nadeem DraftClonSDZ0150, Shamsa Shaikh DraftClonSDZ0564, Aishling Roche DraftClonSDZ0566, Dr James Lee DraftClonSDZ0568, Stephen Ussher DraftClonSDZ0571, Dr Abdul M Jan Jua DraftClonSDZ0577, Amtal ul Rasheed DraftClonSDZ0590, Maryam Abbas DraftClonSDZ0594, Hiba Tul Slam DraftClonSDZ0596, Sumaira Milik DraftClonSDZ0604, M.Saeed Ullah Seethi DraftClonSDZ0573, Sabahuddin Aleem DraftClonSDZ0576, Nasir Ahmed DraftClonSDZ0581, Quratulain Habib DraftClonSDZ0588, Ghazalah Habib DraftClonSDZ0605, Niall Hare, Kishoge Community College)

- 9. There is no commitment for provision of community amenities within the draft plan. (<u>DraftClonSDZ0040</u>, <u>Foxborough Residents Group Lucan</u>, <u>Foxborough Residents Group</u>)
- 10. It is recommended that a Garda Station and Fire Station should be provided and that resources be guaranteed to provide sufficient emergency services to residents of new SDZ without compromising those of existing residents. (DraftClonSDZ0073, Jim Houlihan DraftClonSDZ0159, Paula McMahon DraftClonSDZ0111, Lucan Residents, Clonburris Lucan Action Group DraftClonSDZ0098, Declan Donnelly DraftClonSDZ0099, Tanya McDonald Donnelly DraftClonSDZ0171, A Fahy DraftClonSDZ0173, Lisa Greene DraftClonSDZ0166, Andrew Mowatt DraftClonSDZ0044, Neil Nolan DraftClonSDZ0180, Rupert Fuller <u>DraftClonSDZ0215, Graham Walsh DraftClonSDZ0218, helen Nix DraftClonSDZ0219, Donncha</u> Cleary DraftClonSDZ0107, Peter Corby, Griffeen Glen Residents Association DraftClonSDZ0220, Joe McDermott DraftClonSDZ0237, Hugh McSweeney DraftClonSDZ0255, James Haughton DraftClonSDZ0192, Brian O'Neill DraftClonSDZ0245, Stephen Murphy DraftClonSDZ0193, Kim Rice DraftClonSDZ0194, Brian Shortall DraftClonSDZ0235, Edina Almasi DraftClonSDZ0196, Andrea Panikova DraftClonSDZ0197, Damian McKillop DraftClonSDZ0231, Jennifer Winters DraftClonSDZ0198, Aine McKinlay DraftClonSDZ0267, Niamh Brennan DraftClonSDZ0265, Ian McLean DraftClonSDZ0248, Caroline O'Brien DraftClonSDZ0284, Evelyn Smyth DraftClonSDZ0285, Carol Hogg DraftClonSDZ0290, Agnes Maher DraftClonSDZ0331, Elaine Patriarca DraftClonSDZ0238, Martin Whelan DraftClonSDZ0333, Gary Hore DraftClonSDZ0309, Kim O Halloran DraftClonSDZ0262, Joseph Dolan DraftClonSDZ0264, Christine Broderick DraftClonSDZ0266, Steven Abbey DraftClonSDZ0312, Tina Mc Garry DraftClonSDZ0054, Celine Dunning DraftClonSDZ0200, Lisa Murtagh DraftClonSDZ0206, Sean Smith DraftClonSDZ0278, Liam Swan DraftClonSDZ0347, Una Mullaney DraftClonSDZ0393, Ronan Burke DraftClonSDZ0396, Emer Lynch DraftClonSDZ0397, Marta Isopo DraftClonSDZ0363, Marta Estalayo DraftClonSDZ0279, Lisa Fitzpatrick DraftClonSDZ0280, John Egan DraftClonSDZ0367, ciaran daly DraftClonSDZ0401, Joyce Dolan DraftClonSDZ0403, Kerrie Walsh DraftClonSDZ0369, Patricia Dunphy DraftClonSDZ0356, Peter Flynn DraftClonSDZ0359, Denis Twohig, Westbury Court Residents Association DraftClonSDZ0110, Maria Smith DraftClonSDZ0375, Anita Fletcher DraftClonSDZ0263, Eilís Slattery DraftClonSDZ0376, Marie Fitzpatrick DraftClonSDZ0378, Patrick Tully DraftClonSDZ0413, Tania Daly DraftClonSDZ0414, Fiona Moriarty DraftClonSDZ0417, Siobhan Donnelly DraftClonSDZ0420, Ian Lamon DraftClonSDZ0432, Sara Lemos DraftClonSDZ0143, colm grogan DraftClonSDZ0470, Stephen O'Brien DraftClonSDZ0475, Stephanie Fleming DraftClonSDZ0474, Conor Smith DraftClonSDZ0473, Mark O'Byrne DraftClonSDZ0472, Mark Brennan DraftClonSDZ0431, Andrew Shinnick DraftClonSDZ0467, Gavin Byrne DraftClonSDZ0468, Jack Byrne DraftClonSDZ0469, Richard Gleeson DraftClonSDZ0183, karen hayes DraftClonSDZ0433, Ciara Reidy DraftClonSDZ0435, Tilly Reidy DraftClonSDZ0186, Nicola Kennedy DraftClonSDZ0438, Des Delaney DraftClonSDZ0189, mark reid DraftClonSDZ0476, Lynne Cosgrave DraftClonSDZ0441, Liam Reidy DraftClonSDZ0477, Sarah Gill DraftClonSDZ0478, Muhammad Ali DraftClonSDZ0479, Anna Wezyu DraftClonSDZ0480, Gill Devereux DraftClonSDZ0471, Michael Clarke





DraftClonSDZ0450, Cherie Lynch DraftClonSDZ0449, Marian Spollen DraftClonSDZ0448, Declan Cotter DraftClonSDZ0225, Sarah Moroney DraftClonSDZ0447, Aine O'Sullivan DraftClonSDZ0444, Adrian Reidy DraftClonSDZ0445, Nuala Reidy DraftClonSDZ0257, Deirdre McIntyre DraftClonSDZ0294, Kenny Doyle DraftClonSDZ0297, Celine Kiernan DraftClonSDZ0298, Laura Spencer DraftClonSDZ0299, Sharon Cleary DraftClonSDZ0236, ISO Solutions Ireland, ISO Solutions Ireland DraftClonSDZ0322, Catherine Brady DraftClonSDZ0491, Wayne Quinn DraftClonSDZ0390, Tom Fitzpatrick DraftClonSDZ0421, Lesley Keogh DraftClonSDZ0422, Jonathan Mercier DraftClonSDZ0425, Sinead Hall DraftClonSDZ0426, Breeda De Vines DraftClonSDZ0427, Ciara Weafer DraftClonSDZ0428, Helena Doyle DraftClonSDZ0429, Edelle Boles DraftClonSDZ0430, Ashleigh D'Arcy DraftClonSDZ0451, K E Fendic DraftClonSDZ0452, Leighanne Spollen DraftClonSDZ0453, Skirmante Doda DraftClonSDZ0454, Sean Shortt DraftClonSDZ0527, Laura Gaughan DraftClonSDZ0528, Bernard Gaughan DraftClonSDZ0525, Dermot McGreal DraftClonSDZ0541, Mags Phelan DraftClonSDZ0542, Ciara McHugh DraftClonSDZ0543, Terence Phelan DraftClonSDZ0544, Martina Magee DraftClonSDZ0545, Geoff Grice <u>DraftClonSDZ0483, Nuno Limos DraftClonSDZ0485, Grace Quinn DraftClonSDZ0487, Liam</u> Canty DraftClonSDZ0489, Sarah Walsh DraftClonSDZ0484, Liam Lynch DraftClonSDZ0482, Jason Shanley DraftClonSDZ0517, Niall and Sandra Harrington DraftClonSDZ0486, Brian Kennedy DraftClonSDZ0488, Michaela Larsson DraftClonSDZ0490, Elaine McManamly)

- 11. Submission outlines that there are 3 existing schools and that the Scheme is misleading by stating 8 schools when there are really only 5 new schools. (DraftClonSDZ0043, Jeanine Nolan)
- In relation to amenities, submission outlines that there is no extra provision for a fire station, hospital, garda station, community centre, doctors surgery, dentists and playgrounds (<u>DraftClonSDZ0043</u>, <u>Jeanine Nolan</u>)
- 13. Submission from Lucan resident outlines concerns in relation to social infrastructure. Serious consideration must be made to the needs of children from a social point of view. The facilities in Lucan are significantly oversubscribed and the same mistakes should not be made again. Clonburris should have it's own swimming pool, GAA club, soccer club, rugby club, scouts den etc. Hope these will be provided as part of the initial developments and not left until the final stages. (DraftClonSDZ0167, Niamh Kilcullen)
- 14. Lucan resident advises that there is a need for a Garda Station and more community/leisure facilities in the Planning Scheme. (<u>DraftClonSDZ0214, Gillian McCarthy</u>)
- 15. Resident queries the provision of a Garda station and concerns with regards to adequate policing. It is also requested that adequate youth community facilities and services be provided. (<u>DraftClonSDZ0244</u>, <u>roisin domican</u>)
- 16. Commitment be given that fully inclusive Playspaces are included for every 1000 houses built. (DraftClonSDZ0232, Cllr Francis Timmons)
- 17. That a commitment and timeframe for delivery of community facilities is given in the plan with facilities that caters for the Young, Teenagers, People with a disability and older people. (DraftClonSDZ0232, Cllr Francis Timmons)
- 18. Submission on behalf of Clondalkin community group requests that garda, education, fire station and retail facilities be provided. (<u>DraftClonSDZ0246</u>, <u>George Graham</u>, <u>Westbourne Community Group</u>)
- 19. Clondalkin resident notes proposals in relation to additional facilities (school and retail) and queries provision in relation to policing. (<u>DraftClonSDZ0287, Catherine Bennett</u>)
- 20. The implications of policing what is proposed in Clonburris SDZ needs to be considered and addressed. (<u>DraftClonSDZ0195</u>, <u>South Dublin County Joint Policing Committee South Dublin County Joint Policing Committee</u>)
- 21. The Gardaí are very interested in being involved with the design of communities and they can be available to advise at the design and development stages of the Clonburris





development behaviour. (<u>DraftClonSDZ0195</u>, South <u>Dublin County Joint Policing Committee</u>
South <u>Dublin County Joint Policing Committee</u>, South <u>Dublin County Joint Policing</u>
Committee)

- 22. Plans for a fire station should be enforced. (DraftClonSDZ0270, Joan Johnson)
- 23. Also its imperative that adequate facilities such as a Leisure Centre and schools both primary and secondary be developed as opposed to putting additional pressure on those in the area. This is something often overlooked by planning. (<u>DraftClonSDZ0349</u>, ian daly)
- 24. Submission expresses concerns about the current lack of facilities in the Lucan area before the development of another "town". Currently, there is substantial waiting lists for schools and public services such as Public health nurses etc and these additional houses will only serve to increase waiting lists and reduce care levels for the elderly in the community. Submission requests a review of all services and facilities and infrastructure relating to this development as there is currently no scope for the Lucan community to absorb any additional houses. (DraftClonSDZ0348, Emma Carolan)
- 25. Submission from Lucan resident and Principal of Adamstown Castle ETNS advises that towns/SDZs require certain services and these should not be diluted or offset against other development in west Dublin. (<u>DraftClonSDZ0313</u>, <u>Tom Moriarty</u>)
- 26. There is a need for investment in sustainable schooling solutions which meet the needs of a diverse population with thousands of children who need to gain a high quality education. (DraftClonSDZ0055, Ellen Ward)
- 27. Submission from Lucan resident and Principal of Adamstown Castle ETN advises that schools should be embedded within communities; should cater for the needs of the projected population; should include community facilities; should be well designed; should meet local needs to reduce car dependency; and should be located beside parks and playing fields. (DraftClonSDZ0313, Tom Moriarty)
- 28. Submission outlines concerns with the proposed number of schools as 3 or the 8 are already in existence. There are very few secondary schools in the Lucan area as it is and these extra 30,000 residents will put huge pressure on the no. Of spaces available at secondary school level. (DraftClonSDZ0406, Bernadette Doyle)
- 29. Submission outlines concerns that the swimming pool of Lucan has only recently been approved after 30 years of campaigning. Is there now an intention to build another swimming pool within walking distance of Clonburris as residents will not have cars due to lack of parking available. (DraftClonSDZ0406, Bernadette Doyle)
- 30. Submission outlines that more schools are needed in this area as it is to accommodate the growing community. Therefore believe there should be at least 3/4 extra schools built to facilitate this new build

 Submission would like to see a least one of the schools being another Irish one as there is
 - high demand for this and only 3-4 schools between Lucan and Clondalkin to accommodate this.
 - (DraftClonSDZ0275, Rachel Kavanagh)
- 31. Submission outlines that community areas and green spaces are needed to facilitate the new population that will be added via the Clonburris build. The area suffers from a lot of anti social behaviour as it is. So to practically double our community and add no community amenities would only be adding to the already present vandalism/anti social behaviour (DraftClonSDZ0275, Rachel Kavanagh)
- 32. No Clonburris should be done without a definite Fire Station AND Garda Station definitely being in the area. Rumours have it that these simple two and essential aspects are only just possible. Further they both need to be there not one or the other. (
 DraftClonSDZ0404">DraftClonSDZ0404,

 Brendan Shiels)

Clonburris



- 33. Submission outlines that the area needs a theatre and compares the Lucan, Clondalkin and Clonburris population to Cork City. Submission requests Clonburris address the culture vacuum by having an opera house and just 3 theatres. (DraftClonSDZ0404, Brendan Shiels)
- 34. Submission outlines that between the completed Adamstown and this new proposed development there is potential for a 40,000 additional people in Lucan. Submission outlines that there are no additional fire service provision and questions same and the safety of households to be serviced by existing facilities. (DraftClonSDZ0402, Anna O'Neill)
- 35. Submission from Adamstown resident highlights concerns in relation to potential lack of community services and facilities similar to Adamstown and Lucan. (DraftClonSDZ0357, Meena BASKARASUBRAMANIAN)
- 36. Concerns have been expressed about where fire and police stations would be located and if services like these would be frontloaded or only appear later in the development, which was felt to have been one of the drawbacks of the Adamstown Development.

 (DraftClonSDZ0102, Eddie Fox, Lucan East Educate Together NS)
- 37. There are existing antisocial behaviour problems in the area. Will Clonburris have a garda Station or what Garda Station will be responsible for 21000 residents. (
 <u>DraftClonSDZ0338, Fiona McCormack"</u>)
- 38. Submission from Department of Education and Skills highlights the importance of ensuring that education infrastructure is sufficient to meet the needs of the community. The reservation of lands for school provision in the Clonburris SDZ area and their proximity to green spaces is welcomed. It is noted that the scheme includes two permanent schools located on the SDZ lands (Kishoge Community College and Lucan East Educate Together). It is advised that permanent accommodation for Griffeen Community College (post primary school) will be required within the SDZ lands and that the Department has current plans to develop one of the designated post primary school sites.
 - With respect to additional reserved sites it is indicated that the Department uses GIS data and their own databases to monitor demographic growth and school need. It is advised that the Department will seek to develop school sites when the demographic assessment indicates need.
 - Reference is made in relation to how the Department calculates educational requirements and to technical documents used in the design of school buildings (Identification and Suitability Assessment of Sites for Primary Schools and Post Primary Schools). Reference is also made to the requirements of the Guidelines on Sustainable Residential Development in Urban Areas and the Code of Practice for Planning Authorities and the provision of schools. A request for further consultation with the Department is included in the submission. Information used to calculate educational infrastructure requirements and school site sizes are set out and it is requested that sites be reserved close to community and sports facilities. It is advised that the Department is open to multi-campus schools where two or three primary schools share the same site this reducing the land take. Provision should also be made to allow for the expansion of schools where possible and it is important that sufficient lands are designated for the education needs of additional populations. (DraftClonSDZ0371, Doire Ó Cuinn, Dept of Education & Skills)
- 39. Submission from Lucan resident highlights a shortage of schools particularly post primary in Lucan and for those with special needs. It is advised that new schools must be built and operational before houses are occupied. (<u>DraftClonSDZ0372</u>, <u>Patrick Comerford</u>)
- 40. Joint submission from local representatives seeks the integration of vibrant communities in Lucan, Clonburris and Clondalkin with public infrastructure and services. It is requested that a state of the art Community centre be provided on the SDZ lands for new and existing residents. Queries are raised in relation to the stated number of schools, the phasing of childcare facilities, the absence of plans for a Primary Health Centre and the practicality of multi-faith places of worship. It is also advised that fire brigade and garda resources are





required including a new Garda station. Concern is raised in relation to mention of the provision of a Fire Station in Adamstown in terms of the absence of provision for the Clonburris community. (<u>DraftClonSDZ0419, Cllr. Emer Higgins, Cllr. Vicki Casserly & Cllr. Kenneth Egan</u>)

- 41. Joint submission from local representatives welcomes proposals to maximise public transport accessibility and use including accessibility to schools. It is considered that the distances referenced (400m, 500m, 800m) are based on distances and permeability between existing and proposed housing. It is also stated that parents will more than likely incorporate school drop off as part there commute and that set down spaces be provided.

 (DraftClonSDZ0419, Cllr. Emer Higgins, Cllr. Vicki Casserly & Cllr. Kenneth Egan)
- 42. School places in Lucan are already facing significant demands so there should be no delay in the opening of the remaining planned schools. (<u>DraftClonSDZ0368</u>, <u>Frances Fitzgerald TD</u>)
- 43. Concerns must be addressed regarding the provision of Fire and Garda services, particularly as the proposed Fire Station in the Adamstown SDZ has not yet been developed. (DraftClonSDZ0368, Frances Fitzgerald TD)
- 44. Submission outlines that both the existing and new community must be at the heart of the plans for this SDZ, through the provision of community facilities, services and amenities. The provision of community facilities must run in tandem with the development of housing; community facilities cannot be left until the end phase of the development.

 (DraftClonSDZ0368, Frances Fitzgerald TD)
- 45. A police station and fire station should be delivered at Clonburris. (<u>DraftClonSDZ0251</u>, Amanda O'Sullivan)
- 46. Queries whether there are any increase in emergency services i.e. Garda Station? (DraftClonSDZ0304, PAULINE KEOGH)
- 47. There is concern that the existing Garda services will not be able to cope with the population increase due to Clonburris. (<u>DraftClonSDZ0258</u>, <u>Robert McNeill</u>)
- 48. Potential places of worship need to be identified and expressions of interest sought. (DraftClonSDZ0332, Paul Gogarty)
- 49. Submission outlines that one primary healthcare centre should be catered for in the development. (<u>DraftClonSDZ0502</u>, Ed O'Brien & John Curran TD, Fianna Fail Dublin Mid West)
- 50. Submission requests a definitive position in relation to the inclusion of a Garda Station and it is extremely likely that one will be required. (<u>DraftClonSDZ0502</u>, <u>Ed O'Brien & John Curran</u> TD, Fianna Fail Dublin Mid West)
- 51. Submitted that a third level institution should be included in the draft plan (DraftClonSDZ0502, Ed O'Brien & John Curran TD, Fianna Fail Dublin Mid West)
- 52. Submitted that the number of childcare places may not be sufficient. Co-location of facilities with schools should take place. (<u>DraftClonSDZ0502</u>, Ed O'Brien & John Curran TD, Fianna Fail Dublin Mid West)
- 53. Submitted that the number of proposed schools will not be sufficient (<u>DraftClonSDZ0502, Ed O'Brien & John Curran TD, Fianna Fail Dublin Mid West</u>)
- 54. The provision within the plan for 8 schools, 6 of which are new, is welcome. However, significant pressure needs to be mounted on the Government and the Department of Education to deliver the schools to cater for the existing and new families.

 (DraftClonSDZ0308, Madeleine Johansson, People Before Profit)
- 55. The Clondalkin-Lucan area needs a dedicated Arts Centre, similar to Rua Red in Tallaght. This should be located in either of the main Urban Centres of Clonburris or Kishogue. It should include rehearsal, performance, studio and exhibition spaces, and could be co-located with a library and/or civic centre. (DraftClonSDZ0308, Madeleine Johansson, People Before Profit)
- 56. Submission would like to see a council office, a library and modern health clinics in the SDZ (DraftClonSDZ0500, Declan Hanley)





- 57. Submission outlines that a church and parish centre for local people should be provided. (DraftClonSDZ0500, Declan Hanley)
- 58. Concerns regarding lack of compulsion for specific services, Garda Stations, Fire Station, Third Level Education, Opening of Kishoge and trains stopping more than 4 times a day. (DraftClonSDZ0499, Deirdre Nolan)
- 59. Developers, builders and SDCC must liaise with neighbouring communities during construction periods a community contact person should be employed for the Clonburris SDZ in SDCC. (DraftClonSDZ0308, Madeleine Johansson, People Before Profit)
- 60. Any school built should be given ample room for play areas and car parks. (DraftClonSDZ0434, Nathaniel Doyle)
- 61. Clonburris would need its own swimming pool and playground and not to use those in Lucan. (DraftClonSDZ0434, Nathaniel Doyle)
- 62. It is recognised that the scheme will focus on the lands within boundary however it is important to recognise the opportunity that exists to develop services and infrastructure, within the schemes boundary, that could benefit the surrounding communities.

 (DraftClonSDZ0504, South Dublin County PPN, South Dublin County Public Participation Network)
- 63. There is concern in relation to the lack of planning of specific services provision such as Fire Station, Garda Station, Health Care Clinics, and Family Resource Centres. (<u>DraftClonSDZ0504, South Dublin County PPN, South Dublin County Public Participation Network</u>)
- 64. A 3rd level education institution or satellite campus should be provided to help deliver further education. Less formal means of leaning such as lifelong learning should be recognised, encouraged and facilitated. (DraftClonSDZ0504, South Dublin County PPN, South Dublin County Public Participation Network)
- 65. The provision of schools is welcomed however these should be built ahead of the future population and not afterwards. It is important to recognise the rise of non-denominational schools. New schools should not be temporary, modular and prefabricated buildings and should have access to sports and recreational facilities. School planning should also include provision for Autistic Spectrum Disorder Units. (DraftClonSDZ0504, South Dublin County Public Participation Network)
- 66. It is important that Clonburris provides for accessible education and associated supports to enable young people and adults to develop their full potential within the communities they reside in. (<u>DraftClonSDZ0504</u>, <u>South Dublin County PPN</u>, <u>South Dublin County Public</u> <u>Participation Network</u>)
- 67. Clear provisions should be made to facilitate childcare and crèches. (<u>DraftClonSDZ0504</u>, <u>South Dublin County PPN</u>, <u>South Dublin County Public Participation Network</u>)
- 68. Reference to the potential of a Third level educational facility on the lands and queries whether this has been considered. (DraftClonSDZ0507, Caitriona McClean)
- 69. Query whether consideration has been given to the type of schools proposed. It is stated that Gaelscoilanna in the Lucan and Clondalkin area are heavily oversubscribed and at least one each of the proposed primary and secondary schools should be a Gaelscoil. (DraftClonSDZ0505, Paula Kelly)
- 70. The submission strongly supports that of the Ahmadiyyia Muslim Association regarding the Draft Planning Scheme. It is stated that they would deliver a suitable place of worship with community facilities that would benefit the entire community (DraftClonSDZ0493, Rev John Hassett)
- 71. Concern relating to the absence of a planned Garda Station or Fire Station
 (<u>DraftClonSDZ0537</u>, <u>John Vaughan DraftClonSDZ0536</u>, <u>Michael Jennings DraftClonSDZ0531</u>,

 <u>Adrienne O'Driscoll DraftClonSDZ0532</u>, <u>Ciaran O'Driscoll DraftClonSDZ0530</u>, <u>Kay Vaughan DraftClonSDZ0533</u>, <u>Marie Tweedy DraftClonSDZ0534</u>, <u>Shay Keogh</u>)





- 72. Submission welcomes the commitment of provide community facilities and services to promote health, well- being and social inclusion (DraftClonSDZ0498, Cllr Breeda Bonner)
- 73. Concern in relation to GP services, and emergency services which are over stretched and will not be able to accommodate additional population. (DraftClonSDZ0524, John Roche

 DraftClonSDZ0521, Sarah Roche DraftClonSDZ0522, Carol Roche DraftClonSDZ0523,

 Catherine Roche DraftClonSDZ0551, Michael Roche DraftClonSDZ0552, Ciara Toner

 DraftClonSDZ0553, Greg Toner DraftClonSDZ0554, Jennifer Toner DraftClonSDZ0555,

 Bernadette Toner DraftClonSDZ0556, Lorna Toner DraftClonSDZ0557, Martin Toner)
- 74. Submission concerned about absence of a planned Garda Station or a Fire Station (<u>DraftClonSDZ0559</u>, <u>Brian McKenna</u> <u>DraftClonSDZ0565</u>, <u>Jennifer McKenna</u>)
- 75. Submission outlines the area needs a proper Garda ratio and the need for a manned Garda Station (<u>DraftClonSDZ0560</u>, <u>Sandra McLoughlin DraftClonSDZ0561</u>, <u>Tara Jenkins DraftClonSDZ0562</u>, <u>John McLoughlin DraftClonSDZ0563</u>, <u>Tracey Boland DraftClonSDZ0602</u>, <u>Catherine Scanlon DraftClonSDZ0603</u>, <u>Vincent Scanlon</u>)
- 76. The nearest fire station is Tallaght or Blanchardstown both at least 10 minutes away for both Ambulance and Fire engines. With the huge increase in population in Lucan and proposed in Clonburris, emergency services need to be considered. (<u>DraftClonSDZ0384</u>, <u>Grainne Lamon</u>)
- 77. With the expected population increase resulting from the development, there is a need for extension of GARDA services and staff allocated to the area. (DraftClonSDZ0515, Christopher Conway)
- 78. Schools sites should allow sufficient capacity for expansion into the future and numbers of pupils from outside the Lucan area attending local schools should be addressed. (DraftClonSDZ0511, Julie Kearns)
- 79. A new swimming pool is to be built in the Lucan area, is this to service the Clonburris population also. Clonburris should have its own swimming pool and other local community facilities. (DraftClonSDZ0511, Julie Kearns)
- 80. Sinn Féin submission states that specific attention needs to be paid to new schools to ensure that the specific congestion issues that occur at school drop off and collection times is avoided, and that there is no over concentration of schools (existing and new) with the consequent additional traffic burden at specific locations. (DraftClonSDZ0383, Eoin Ó Broin TD, Cllr Danny O'Brien & Cllr Mark Ward)

Chief Executive's Responses

The Chief Executive notes the variety and number of submissions in relation to community services, fire station, Garda Station, place of worship, childcare and schools.

As a general preferred outcome, community facilities will predominantly be located within the main urban centres and local nodes in the Draft Planning Scheme. Facilities with a district wide function such as a civic centre/ libraries will be located within the Clonburris Urban Centre Retail Core area. Community facilities such as community centres, local community/ youth activity floor space and places of worship are supported in the Urban Centres, encouraging user participation and a locally based community focus.

It is stated in the Draft Planning Scheme that healthcare facilities, childcare facilities and community buildings will predominantly be directed into the urban centres and to locations that are accessible by public transport, walking and cycling. The locations of these community uses in the urban centres is important to achieve a mix of uses and a critical mass of active development for place making. Place Making is the combination of spatial planning, urban design and public realm to create attractive, distinct and vibrant locations. The urban centres in the Draft Planning Scheme will be critical in the creation of distinctive new places in Clonburris and ensuring that there are discernable





focal points in the scheme to provide identity, amenities and facilities for the community. The urban centres at Clonburris and Kishoge are key elements in achieving the vision of this Planning Scheme which sets out to create a vibrant community offering a new way of living. The provision of the community facilities will be subject to detailed design and will be required to comply with the Draft Planning Scheme parameters. Additionally, the facilities will be required to obtain planning approval through Part 8 or planning applications.

Fire Station

The concerns of the submissions in relation to the provision of a fire station are noted. Fire Stations are generally located on a regional scale. It is noted that the Adamstown SDZ Planning Scheme has identified a possible site for a Fire Station. Given the nature and scale of development proposed in Clonburris, provision has been made to reserve a site for a fire station. Following consultation with the Dublin Fire Brigade, the preferred site is identified adjacent to the Fonthill road and Thomas Omer Way adjacent to Clonburris Urban Centre. The delivery of the fire station on the site is the responsibility of the Dublin Fire Brigade.

Garda Station

The Draft Planning Scheme outlines that in the event of An Garda Siochana identifying the need for the provision of a Garda Station at Clonburris, the station can be accommodated within the Kishoge or Clonburris Urban Centres. The provision of Garda Stations is the function of the Department of Justice and Equality in conjunction with An Garda Siochana.

Place of Worship

The Draft Planning Scheme recognises the importance of places of worship and multi-faith centres in meeting the diverse religious and cultural needs of the community. The Scheme supports and facilitates the development of places of worship and multi-faith facilities at Clonburris Urban Centre, Kishoge Urban Centre and at other suitable locations where they do not adversely impact on residential amenities and comply with the Draft Planning Scheme. The priority location principle shall apply with site suitability assessed based on the catchment scale for the proposal, the urban centre hierarchy of the Draft Planning Scheme, the accessibility of the site and the availability of alternative, more suitable sites.

Schools and Education

The Department of Education and Skills is responsible for the delivery of educational facilities and services. South Dublin County Council works with the Department of Education and Skills, 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 and South Dublin County Council will work under the MoU in relation to the identification and acquisition of school sites in Clonburris.

The Department has identified a need for three new primary schools and three new post primary schools within the development of the Planning Scheme and to complement the existing schools on the SDZ lands. The sites are incorporated into the land use concept and transportation assessment of the Planning Scheme. Approximately 72% of residents in the Draft Planning Scheme will be located within 500m of a school. The demographic of the emerging population in Clonburris will 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 the Draft Planning Scheme. The delivery of the school sites to the Department in tandem with the planning and construction of residential units is a phasing requirement of the Scheme (See also Section 4.0 Phasing).

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A few submissions have promoted the SDZ as a location for third level education. It is considered that the Draft Planning Scheme has provided a spatial framework for the development of the SDZ lands. In general, large scale third level facilities have a regional catchment and are located in regionally recognised towns. In this context, it is noted that the County Town of Tallaght is host to the ITT. The Draft Planning Scheme has not reserved an area of land for large scale third level education, however, it is considered that the spatial framework supports the provision of education facilities integrated into the urban environment within the urban centres. In this context, it is noted that Education is listed as permitted in principle in the Urban Centres. For third level proposals, the priority location principle shall apply with site suitability assessed based on the catchment scale for the proposal, the urban centre hierarchy of the Draft Planning Scheme, the accessibility of the site and the availability of alternative, more suitable sites.

Health Services

A number of submissions request the provision of health care facilities. The Draft Planning Scheme outlines that healthcare provision encompasses a range of services, from small scale medical surgeries to district level facilities. The Draft Planning Scheme recognises the importance of the provision of healthcare services in Clonburris in tandem with population and supports the Health Service Executive (HSE) and other agencies in the provision of appropriate healthcare facilities, including the provision of community based primary care facilities. Large medical centres and group practices will be favourably considered and accommodated in Clonburris Urban Centre and Kishoge Urban Centre.

The phasing for the Scheme requires the provision of a primary health care centre. The centre should facilitate teams of multidisciplinary professionals (i.e. GPs, nurses, therapists, home care services, social workers) to serve the needs of the population. Small scale medical surgeries/practices (doctor/dentist/physiotherapist etc.) are also supported in the Draft Planning Scheme, subject to compliance with the urban hierarchy and priority location principles. Provision of small scale medical surgeries in residential areas are open for consideration. Any such proposal will be required to demonstrate a spatial rationale for the provision of such services in the context of the availability of alternative sites and floorspace, the location of schools and employment, public transport services and other healthcare facilities.

Childcare It is noted that a number of submissions relate to the provision of childcare facilities in the Draft Planning Scheme. The Draft Planning Scheme seeks to facilitate the sustainable development of good quality and accessible early childhood care (early years and general childcare both home based and centre based) and education infrastructure. It is considered that a requirement for pro-rata childcare provision will not necessarily meet the needs of an evolving population or ensure sufficient flexibility in the longer-term and that market factors and government policy will have a greater role.

The Scheme requires an approach to early childhood care that combines area based and market led provision. The Scheme requires a minimum of one purpose built facility in the Clonburris Urban Centre and one purpose built facility in Kishoge Urban Centre. The minimum requirements for childcare spaces across the lands shall be in accordance with Table 2.7.2.

The Scheme supports proposals for early childhood care and education use within employment floorspace, community buildings such as community centres and schools. Early childhood care in residential units should only be provided at an appropriate scale to complement purpose built facilities and are subject to appropriate safeguards. Childcare facilities should be within walking and cycling distance of educational, community facilities and employment locations.





Other

A few submissions received outline that Clonburris requires a theatre and a swimming pool. Having regard to the South Dublin County Council Development Plan and the hierarchy of urban centres in the county, it is noted that Clonburris is at a District level. Section 2.7.3 outlines that site suitability will be assessed based on the catchment scale for the proposal, the urban centre hierarchy of the Planning Scheme, the accessibility of the site and the availability of alternative, more suitable sites. It is noted that the Section 2.1.3 Types of Development and Section 2.4 Urban Centres provides a supportive spatial framework for the provision of a theatre and leisure facilities, subject to Section 2.7.3 requirements.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.





Section 2.8 Built Form and Design

2.8.2 Design Criteria

- It will be of long term value if high quality materials are used in all construction to avoid excessive maintenance in the future. Finishes of concrete, brick and stone are proposed as opposed to timber. Measures including rain water harvesting and solar panels are welcomed, flat roofs should be avoided. (<u>DraftClonSDZ0050</u>, <u>Pamela Corrigan</u>, <u>Labour Party Clondalkin Branch/ Dublin Mid West</u>)
- The style and type of housing is going to create gettos of the future. (<u>DraftClonSDZ0084</u>, <u>Corey Sammon</u>)
- Joint submission from local representatives requests further detail on how new development will integrate with existing development in terms of permeability and interface with existing cul de sacs. (<u>DraftClonSDZ0419</u>, <u>Cllr. Emer Higgins</u>, <u>Cllr. Vicki Casserly & Cllr. Kenneth Egan</u>)
- 4. The built form and design of housing must be of high quality and the private housing and public housing should be of same quality and visual appearance. (DraftClonSDZ0260, Andrew Newman)
- Submission on behalf of Everglade Properties Ltd (in receivership) suggests that an
 overarching statement is put in place in terms of building lines, block layouts and other
 urban design criteria, that the images are indicative and subject to assessment on each
 application. (<u>DraftClonSDZ0343</u>, <u>Everglade Properties Limited</u> (<u>In Receivership</u>) <u>Everglade</u>
 <u>Properties Limited</u> (<u>In Receivership</u>)
- 6. The impact of additional traffic on environmental health should be considered including the impact on schools, childcare facilities and ensure safe access and safe drop off facilities.

 (DraftClonSDZ0234, Fiona Byrne, HSE Environmental Health)
- 7. The Design criteria and Design Statements (p.53-54) sets out good design with use of traditional materials and high quality building finishes. The promotion of 'a vibrant mix of finishes, colour and detailing' may be off-putting however due to the unsuccessful use of vibrant colours in nearby Balgaddy. (<u>DraftClonSDZ0308</u>, <u>Madeleine Johansson</u>, <u>People Before Profit</u>)
- 8. Requests that material and finishes be weather proofed with long lasting material such as brick or stone or pebble dash. No wood facing or painted walls that deteriorate rapidly. (DraftClonSDZ0498, Cllr Breeda Bonner)
- 9. The proposed development design and form is intrusive and not in keeping with the established estates structures that border the southern side of the SDZ. (DraftClonSDZ0606, Sandra Scully)

Chief Executive's Responses

General Building Design

Further to submissions highlighting concerns in relation to the design of development; to aid in a coherent approach to the design of development across the SDZ lands, it is a requirement under Section 2.8.2 of the Draft Planning Scheme for external finishes of structures and the general appearance and design of development to accord with the design led criteria set out under the:

- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009);
- Retail Planning Guidelines for Planning Authorities (2012); and
- The design manuals that accompany the above documents.

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The above documents and their design criteria have been used to inform the overall Urban Structure of the Draft Planning Scheme and will ultimately help govern the design of all buildings whether publicly or privately owned. To further ensure coherency and quality in design, it is a requirement for all medium to large scale development proposals (Landmark Buildings, 10 dwellings or more in the case of residential development or development of over 1,000 sq.m in the case of employment or retail/ non-retail services development) to be accompanied by a Design Statement that (inter alia) demonstrates compliance with the urban design criteria contained in the aforementioned guidelines. It is also stated that permission should only be granted for development on the SDZ lands where its design is of good quality and would not result in a sub-standard environment. It is therefore considered that the provisions of the SDZ Draft Planning Scheme together with the aforementioned guidance documents address concerns in relation to design quality.

Block Size and Form

The stand alone figures included in the Draft Planning Scheme that are used to illustrate block size and form are clearly referenced as examples and the inclusion of a statement to confirm this is not considered necessary. It is advised that the Building Centre Line drawing (Fig 2.8.5) is vital to ensure coherency and consistency in the design and alignment of the higher order Link Streets. Link Streets are designated as strategic streets with fixed alignment under the Movement Strategy for the Planning Scheme and deviation from the building centre line would affect the co-ordinated integration of adjacent developments in terms of street design requirements (carriageways widths, pedestrian paths, cycle paths etc.) and consistent building frontages/setbacks. A miss match in relation to the alignment of streets and buildings could affect the ability to comply with DMURS and the National Cycle Manual. It would therefore not be appropriate to indicate that the Building Centre Line is indicative.

External Finishes

Further to concerns in relation to the durability and appearance of building materials, Section 2.8.2 of the Draft Planning Scheme requires building finishes to be durable and of a high quality. Traditional materials such as stone, brick, metal and glass are supported. It is also a requirement for finishes to adhere to the principles of sustainability and energy efficiency. It is within the context of its traditional use and availability as a renewable material that timber is supported.

In order to promote place making, a vibrant mix of finishes, colour and detailing is promoted in the Clonburris and Kishoge Urban Centres particularly in the case of Landmark and Local Landmark Buildings. This accords with the urban design principles contained in the Urban Design Manual: A Best Practise Guide (2009) particularly those that relate to 'Context' and 'Distinctiveness'.

Detailed Design

The detailed design of individual proposals will be subject to detailed assessment at planning application stage. Issues such as drop off, access and environmental health for schools will be scrutinised at such stage and will be informed by the General Design Guidelines for Schools: Primary & Post Primary (2017).

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.

2.8.3 Block Size and Form

1. Submission outlines that the inclusion of an independent courtyard type apartment complex should be located ideally adjacent to the Griffeen Park within the SDZ. These types of independent living complexes are ideal for mature people in the community who are





considering downsizing and provides an attractive, safe and secure accommodation for couples and single persons. (DraftClonSDZ0407, LIONA O'TOOLE)

Chief Executive's Responses

Further to the submission seeking courtyard type apartment complexes, it is advised that the prescribed use of perimeter blocks and enclosure of private open space under Sections 2.1.6 (residential development standards) and 2.8.3 (Block, Size and Form) of the Draft Planning Scheme promotes such development. This is reflected by the illustrations and overall urban structure of the SDZ Masterplan. Furthermore, Section 2.1.6 also supports the provision of accommodation for older people (independent and semi-independent living) both within the Kishoge and Clonburris Urban Centres and their contiguous Development Areas that are proximate to (inter alia) public transport services. This would allow for such development to occur in areas adjacent to the proposed Griffeen Valley Park extension.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.

2.8.4 Topography, Street Interface and Urban Grain

 Submission from NAMA outlines that fine urban grain can be achieved without providing terraces of individually and spatially independent mixed use buildings and is difficult to achieve while maintaining density at key transport nodes. Similarly prescribing plot widths is unnecessarily prescriptive and will limit design flexibility. (<u>DraftClonSDZ0350</u>, <u>Deirdre</u> <u>O'Connor National Asset Management Agency</u>, <u>NAMA</u>)

Chief Executive's Responses

Further to the submission in relation in relation to urban grain, it is advised that urban grain ranges are only specified along certain frontages (canal, park, urban centre) where it is pertinent in the interest of place making and visual setting. This accords with the principles of urban design including those set out under the Retail Design Manual: A companion document to the Retail Planning Guidelines for Planning Authorities (2012), which advises that a finer urban grain generally adds to the attractiveness of places and can increase pedestrian permeability.

The provision of houses/townhouses or duplexes subdivided into plots capable of independent development is only sought along designated park and canal frontages and not at transport nodes (see Fig. 2.8.5 of Planning Scheme). Within this context, medium density terraced and duplex housing is generally achievable in areas where canal and park frontages are designated. Amending this aspect of the Planning Scheme is therefore not warranted.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.

2.8.6 Building Heights and Street Widths

- 1. Opposition is raised to any new buildings being above two storeys in height. (DraftClonSDZ0029, Alan Johnson)
- 2. Submissions outline objections to densities and building heights particularly along the northern boundary of the SDZ lands and in the proposed Kishogue North Neighbourhoods (up to 5 storeys) by reason of proximity to two storey houses in Lucan, excessive density, building height, impact on residential amenity (privacy, light, noise) and creation of two





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communities.

Suggested solutions include designating low density and low rise housing close to existing homes, restricting building heights to prevent overlooking, orientating rear gardens of new homes towards existing housing and rearranging densities and building heights so they are lowest adjacent to existing homes. Some submissions also request that a maximum height of two storey apply in proximity the existing 2 storey housing.

(DraftClonSDZ0098, Declan Donnelly DraftClonSDZ0073, Jim Houlihan DraftClonSDZ0111,

<u>Lucan Residents, Clonburris Lucan Action Group DraftClonSDZ0099, Tanya McDonald</u> Donnelly DraftClonSDZ0171, A Fahy DraftClonSDZ0173, Lisa Greene DraftClonSDZ0166, Andrew Mowatt DraftClonSDZ0044, Neil Nolan DraftClonSDZ0096, Laura Flanagan <u>DraftClonSDZ0100, Frances Norton DraftClonSDZ0216, LIONA O'TOOLE DraftClonSDZ0218,</u> helen Nix DraftClonSDZ0107, Peter Corby, Griffeen Glen Residents Association DraftClonSDZ0219, Donncha Cleary DraftClonSDZ0220, Joe McDermott DraftClonSDZ0237, Hugh McSweeney DraftClonSDZ0255, James Haughton DraftClonSDZ0192, Brian O'Neill DraftClonSDZ0245, Stephen Murphy DraftClonSDZ0193, Kim Rice DraftClonSDZ0194, Brian Shortall DraftClonSDZ0235, Edina Almasi DraftClonSDZ0196, Andrea Panikova DraftClonSDZ0197, Damian McKillop DraftClonSDZ0231, Jennifer Winters DraftClonSDZ0198, Aine McKinlay DraftClonSDZ0267, Niamh Brennan DraftClonSDZ0265, Ian McLean DraftClonSDZ0248, Caroline O'Brien DraftClonSDZ0284, Evelyn Smyth DraftClonSDZ0285, Carol Hogg DraftClonSDZ0290, Agnes Maher DraftClonSDZ0331, Elaine Patriarca DraftClonSDZ0238, Martin Whelan DraftClonSDZ0333, Gary Hore DraftClonSDZ0309, Kim O Halloran DraftClonSDZ0262, Joseph Dolan DraftClonSDZ0264, Christine Broderick DraftClonSDZ0266, Steven Abbey DraftClonSDZ0312, Tina Mc Garry DraftClonSDZ0054, Celine Dunning DraftClonSDZ0200, Lisa Murtagh DraftClonSDZ0278, Liam Swan DraftClonSDZ0347, Una Mullaney DraftClonSDZ0206, Sean Smith DraftClonSDZ0191, Rafal Marzec DraftClonSDZ0393, Ronan Burke DraftClonSDZ0396, Emer Lynch DraftClonSDZ0397, Marta Isopo DraftClonSDZ0363, Marta Estalayo DraftClonSDZ0279, Lisa Fitzpatrick DraftClonSDZ0280, John Egan DraftClonSDZ0367, ciaran daly DraftClonSDZ0401, Joyce Dolan <u>DraftClonSDZ0403</u>, Kerrie Walsh <u>DraftClonSDZ0352</u>, Rita O'Brien <u>DraftClonSDZ0369</u>, Patricia Dunphy DraftClonSDZ0356, Peter Flynn DraftClonSDZ0110, Maria Smith DraftClonSDZ0101, Peter Kelly DraftClonSDZ0263, Eilís Slattery DraftClonSDZ0376, Marie Fitzpatrick DraftClonSDZ0378, Patrick Tully DraftClonSDZ0413, Tania Daly DraftClonSDZ0414, Fiona Moriarty DraftClonSDZ0417, Siobhan Donnelly DraftClonSDZ0420, Ian Lamon DraftClonSDZ0432, Sara Lemos DraftClonSDZ0056, Elizabeth Grace DraftClonSDZ0143, colm grogan DraftClonSDZ0470, Stephen O'Brien DraftClonSDZ0475, Stephanie Fleming DraftClonSDZ0474, Conor Smith DraftClonSDZ0473, Mark O'Byrne DraftClonSDZ0472, Mark Brennan DraftClonSDZ0431, Andrew Shinnick DraftClonSDZ0467, Gavin Byrne DraftClonSDZ0468, Jack Byrne DraftClonSDZ0469, Richard Gleeson DraftClonSDZ0183, karen hayes DraftClonSDZ0184, Barry Jenkinson DraftClonSDZ0185, Hazel Smyth DraftClonSDZ0433, Ciara Reidy DraftClonSDZ0435, Tilly Reidy DraftClonSDZ0186, Nicola Kennedy DraftClonSDZ0438, Des Delaney DraftClonSDZ0189, mark reid DraftClonSDZ0476, Lynne Cosgrave DraftClonSDZ0441, Liam Reidy DraftClonSDZ0477, Sarah Gill DraftClonSDZ0478, Muhammad Ali DraftClonSDZ0479, Anna Wezyu DraftClonSDZ0480, Gill Devereux DraftClonSDZ0471, Michael Clarke DraftClonSDZ0450, Cherie Lynch DraftClonSDZ0449, Marian Spollen DraftClonSDZ0225, Sarah Moroney DraftClonSDZ0448, Declan Cotter DraftClonSDZ0447, Aine O'Sullivan DraftClonSDZ0444, Adrian Reidy DraftClonSDZ0445, Nuala Reidy DraftClonSDZ0257, Deirdre McIntyre DraftClonSDZ0294, Kenny Doyle DraftClonSDZ0297, Celine Kiernan DraftClonSDZ0298, Laura Spencer DraftClonSDZ0299, Sharon Cleary DraftClonSDZ0236, ISO Solutions Ireland, ISO Solutions Ireland DraftClonSDZ0497, Owner/ Occupier DraftClonSDZ0322, Catherine Brady DraftClonSDZ0491, Wayne Quinn DraftClonSDZ0390, Tom Fitzpatrick DraftClonSDZ0421,





Lesley Keogh DraftClonSDZ0422, Jonathan Mercier DraftClonSDZ0423, Damien Moloney DraftClonSDZ0424, John Coleman DraftClonSDZ0425, Sinead Hall DraftClonSDZ0426, Breeda De Vines DraftClonSDZ0427, Ciara Weafer DraftClonSDZ0428, Helena Doyle DraftClonSDZ0429, Edelle Boles DraftClonSDZ0430, Ashleigh D'Arcy DraftClonSDZ0451, K E Fendic DraftClonSDZ0452, Leighanne Spollen DraftClonSDZ0453, Skirmante Doda DraftClonSDZ0454, Sean Shortt DraftClonSDZ0527, Laura Gaughan DraftClonSDZ0528, Bernard Gaughan DraftClonSDZ0525, Dermot McGreal DraftClonSDZ0540, John McGivney, Finnstown Abbey Residents Association DraftClonSDZ0541, Mags Phelan DraftClonSDZ0542, Ciara McHugh DraftClonSDZ0543, Terence Phelan DraftClonSDZ0544, Martina Magee DraftClonSDZ0545, Geoff Grice DraftClonSDZ0546, Sandra Coleman DraftClonSDZ0550, Cian Fleming DraftClonSDZ0559, Brian McKenna DraftClonSDZ0565, Jennifer McKenna DraftClonSDZ0483, Nuno Limos DraftClonSDZ0485, Grace Quinn DraftClonSDZ0487, Liam Canty DraftClonSDZ0489, Sarah Walsh DraftClonSDZ0484, Liam Lynch DraftClonSDZ0482, Jason Shanley DraftClonSDZ0517, Niall and Sandra Harrington DraftClonSDZ0486, Brian Kennedy DraftClonSDZ0488, Michaela Larsson DraftClonSDZ0490, Elaine McManamly)

- 3. Submission raised concerns of placing higher density buildings besides existing 2 storey homes. Proposal shows a complete lack of continuity and respect for integration of these proposed houses into an already built up area. An urban proposal for a suburban setting (DraftClonSDZ0043, Jeanine Nolan)
- 4. Submission outlines that building will be too high and too close to current housing. (DraftClonSDZ0201, Mary Haddock)
- 5. Objection to the height of proposed buildings. (<u>DraftClonSDZ0270, Joan Johnson</u>)
- 6. The density and building heights of development in areas adjoining existing estates of two storey homes should reflect the character of the adjoining area and not allow any marked jump in building heights. In particular, any new development immediately adjoining Foxborough, Rossberry or Tullyhall estates should be two storey in height. (DraftClonSDZ0204, William Lavelle)
- 7. Submission on behalf of landowner (Cairn Homes PLC) welcomes flexibility with regard to the height of landmark buildings. It is requested that buildings heights along the fixed central east-west road be amended from 4-5 storeys to 3 5 storeys for reason of flexibility and that apartments up to 6 storeys also be allowed (5 storeys plus additional setback outside of Urban Centres where a design case can be made) by reason of urban design and costs efficiencies at 6 stories. (DraftClonSDZ0351, Cairn Homes Plc, Cairn Homes)
- 8. Submission outlines concerns about high rise buildings directly beside the existing 2 story building/residences. (<u>DraftClonSDZ0370</u>, <u>Shirley Clarke</u>)
- 9. There are concerns about the height of houses nearest to existing development. (DraftClonSDZ0102, Eddie Fox, Lucan East Educate Together NS)
- 10. Joint submission from local representatives requests that building heights and densities along the boundaries of the SDZ lands reflect that of existing housing. It is advised that the provision of 5 storey housing in such areas would alter existing character and result in overlooking. (DraftClonSDZ0419, Cllr. Emer Higgins, Cllr. Vicki Casserly & Cllr. Kenneth Egan)
- 11. The planned height of houses and apartments is too high and will be an eyesore and not suited to family life. This is not suitable for this location which is not in the city centre. (<a href="https://doi.org/10.2026/0.2026-0.2026
- 12. Concern regarding impact of three or more storey buildings on existing development by way of overlooking. It is recommended that the setback outlined in the County Development Plan and the policy in the Adamstown SDZ that housing adjoining Clonburris should not be overlooked by a greater height should be incorporated into the plan. (DraftClonSDZ0332, Paul Gogarty)
- 13. Submission on behalf of Everglade Properties Ltd (in receivership) suggests that upward modifiers be set out which would allow an additional 1-2 storeys in building height at certain





locations which can be demonstrated as being suitable. The upward modifiers would be related to the provision of a justification in terms of urban design and proximity to transport hubs within the SDZ. Submission refers to an example in DLRCC Development Plan. (DraftClonSDZ0343, Everglade Properties Limited (In Receivership), Everglade Properties Limited (In Receivership))

- 14. Submission outlines that the interface with existing residential areas in Lucan and Clondalkin should be appropriate in terms of density and building height to avoid overlooking and too densely populated areas. (DraftClonSDZ0502, Ed O'Brien & John Curran TD, Fianna Fail Dublin Mid West)
- 15. Building heights are not clear in the scheme and are in places contradictory in particular in reference to existing one and two storey heights on page 60 and also in reference to the Building Height Concept Figure 3.3.2 shows streets backing on to Oldbridge, Rossberry, Tullyhall, Foxborough and Ashwood as BH1 2-4 storeys residential. A maximum 2 storey designation should be given to these blocks, in order to ensure adherence to the comment made on p. 60 quoted above. (DraftClonSDZ0308, Madeleine Johansson, People Before Profit)
- 16. Expresses concerns with regard to high rise apartment buildings due to past developments failure to invest in proper concierge services and communal facilities. (DraftClonSDZ0498, Cllr Breeda Bonner)

Chief Executive's Responses

In order to promote place making, urban legibility and visual diversity, varied building heights are proposed across the SDZ lands. Building heights have been designated in the Draft Planning Scheme to recognise the importance of place making and also to reflect other aspects of the Draft Scheme including street hierarchy, density and urban structure requirements i.e. the primacy of Urban Centres, Link Streets and Arterial Streets.

Section 2.8.6 of the Draft Scheme states that to ensure that building heights respect the surrounding context, new developments immediately adjoining existing one and two storey housing shall incorporate a gradual change in building height with no significant marked increase in close proximity to existing low-rise housing. This addresses concerns raised in relation to proposed building heights particularly in relation to development that would be proximate to existing residential communities and integration with existing building heights. This is dealt with further below in this report under submission summaries and responses for Chapter 3 (Development Areas).

In addition and in reference to privacy and overlooking, the Draft Planning Scheme states that a separation distance of 22 metres should generally be provided between directly opposing above ground floor windows to maintain privacy between residential schemes. Issues in relation to the management of apartment buildings are governed by Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2015).

In relation to amending the Draft Planning Scheme to allow reduced building heights in Urban Centres and along the East-West Link Street, it is advised that this would have implications in terms of urban design, place making, density requirements and compliance with DMURS in relation to building height to street width ratios. It is further advised that the wider carriageway widths of Link Streets and scale of urban squares will appropriately frame and absorb the prescribed building heights.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.





2.8.8 Sunlight and Daylight

1. There is a concern for a reduction in natural light to existing homes. (<u>DraftClonSDZ0023</u>, <u>sean gillen</u>)

Chief Executive's Responses

As stated above, Section 2.8.6 of the Draft Scheme states that to ensure that building heights respect the surrounding context, new developments immediately adjoining existing one and two storey housing shall incorporate a gradual change in building height with no significant marked increase in close proximity to existing low-rise housing. This addresses concerns in relation to loss of natural light to existing homes. The Draft Planning Scheme also provides the broad framework where daylight and sunlight requirements can be met through appropriate block layout and building design. Adherence to the prescribed street proportions and building heights will help ensure that appropriate daylight and sunlight are achieved.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.

2.8.11 Street Planting, Furniture and Materials

 Submission outlines that street trees should be appropriately dispersed and be of size in keeping with residential areas and require as little maintenance as is possible (DraftClonSDZ0502, Ed O'Brien & John Curran TD, Fianna Fail Dublin Mid West)

Chief Executive's Responses

In relation to street trees, the Draft Planning Scheme refers to DMURS, which requires street trees to be considered as an integral part of the street environment in accordance with the size of species selected proportionate to the width of the street. Within this context, the Draft Planning Scheme states that larger species should therefore be planted along Arterial and Link Streets and smaller species along Local Streets (see Fig. 2.8.13 for example). Detailed issues in relation to maintenance will be considered at planning application stage.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.

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Section 2.9 Services, Infrastructure and Energy Framework

2.9.1 Introduction/General

- Submission from CIE advises that they cannot ascertain from the Draft Planning Scheme the
 extent of new services that may traverse above or below the railway line and that no utilities
 or service crossings will be permitted until all safety, technical and commercial criteria have
 been satisfied. It is submitted that CIE will not enter wayleaves with development
 companies. (<u>DraftClonSDZ0295</u>, <u>Aidan Ruane</u>, <u>CIE Group Property Management</u>
 <u>DraftClonSDZ0346</u>, <u>Aidan Ruane</u>, <u>CIE Group Property Management</u>)
- 2. There is a lack of infrastructure for the proposed development. (<u>DraftClonSDZ0301, Claire Mescall</u>)
- 3. Submission on behalf of landowner (Cairn Homes PLC) requests that the Planning Scheme provide discretion in relation to accepting alternative or interim engineering solutions where any land owner is not cooperating. It is also requested that the possibility of an interim water supply connection from an existing main on Fonthill Road (shown as closed in long terms on Fig. 2.9.1) be confirmed. (DraftClonSDZ0351, Cairn Homes Plc, Cairn Homes)
- 4. Submission on behalf of Everglade Properties Ltd (in receivership) outlines that Waterman Moylan have undertaken a high level review of the overall infrastructural/engineering aspects of the Draft Planning Scheme on behalf of the client. Submitter is satisfied with the proposals which are considered reasonable and appropriate for the subject lands (DraftClonSDZ0343, Everglade Properties Limited (In Receivership) Everglade Properties Limited (In Receivership))
- 5. The planning stage would be the most appropriate time to determine light spillage from street lighting. In addition, the railway line and Grange Castle Business Park will be a lighting issue for houses and mitigation measures should be proposed. (<u>DraftClonSDZ0234, Fiona Byrne, HSE Environmental Health</u>)
- Submission outlines that area should have post boxes, bins and Wi-Fi (<u>DraftClonSDZ0500</u>, <u>Declan Hanley</u>)
- 7. The Eastern and Midland Regional Assembly submission states that the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 support the provision of services that maximizes the investment in public infrastructure, including sustainable design and building solutions with regard to energy efficiency and Sustainable Urban Drainage schemes.

 (DraftClonSDZ0296, malachy Bradley, Eastern and Midland Regional Assembly)

Chief Executive's Response

The Services, Infrastructure and Energy Framework included in the Draft Planning Scheme sets out a range of requirements and interventions, identified to support the quantum of residential and non-residential development proposed on the SDZ lands. The framework is also based on the land use mix and density, built form, street hierarchy and public space layout of the Draft Planning Scheme.

Having regard to submissions made, it is noted that the framework and related layouts contained in the Draft Planning Scheme are indicative in nature, with particular regard to water supply, foul water drainage, surface water drainage and sustainable urban drainage systems. In accordance with Section 4.0 Phasing & Implementation, prior to the commencement of development, strategic district level measures and detailed design shall be prepared by the developers and agreed with South Dublin County Council through a Surface Water Management Plan, to implement the prepared Surface Water Strategy. Furthermore, prior to commencement of development, detailed Water and Wastewater plans for the Planning Scheme shall be prepared by the developers and agreed with Irish Water and South Dublin County Council. Any considerations and requirements for





any interim or suitable alternative solutions could be considered between all relevant stakeholders as part of these plans to be undertaken, and in conjunction with the phased delivery of development on the SDZ lands. Any proposed crossings, including that of the rail line, if necessary, will be explored

and carried out in consultations with all relevant stakeholders including CIE and Irish Rail.

The impact of any light spillage from street lighting, the railway line and Grangecastle Business Park can be considered as part of detailed planning applications for development on the SDZ lands. It is also noted that Section 2.11.2 Biodiversity and Natural Heritage Features of the Draft Planning Scheme, refers to sensitive lighting design having regard to development along the Grand Canal.

The provision of IT, broadband internet and high speed telecommunications infrastructure is adequately addressed in Section 2.9.7 Telecommunications Infrastructure, of the Draft Planning Scheme. Refuse and bin storage is adequately addressed in Section 2.9.9 Waste Management and Recycling Facilities of the Draft Planning Scheme. The provision of post boxes and other related services can be addressed at detailed design stage and as part of planning applications for development on the SDZ lands. This can also be carried out in consultation with post service providers, including An Post.

Having regard to the submission from the Eastern and Midlands Regional Assembly, the Draft Planning Scheme has been prepared in accordance with the Regional Planning Guidelines for the Greater Dublin Area 2010-2022.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.

2.9.2 Water Supply

- Consideration should be given to the presence or absence of private wells and the possible impacts that the development may have on the groundwater 'zone of influence' if private wells do exist. (DraftClonSDZ0234, Fiona Byrne, HSE - Environmental Health)
- 2. There is a low water pressure problem in the area that needs to be addressed with new homes being added to the system. (<u>DraftClonSDZ0511</u>, <u>Julie Kearns</u>)

Chief Executive's Response

Figure 2.9.1 of the Draft Planning Scheme shows an indicative strategic network for water supply to service the SDZ lands. This has been prepared by Irish Water, who confirm that there is generally sufficient capacity in the public water networks in the vicinity of the SDZ site to connect developer provided water services infrastructure serving the SDZ lands to the Irish Water networks. In accordance with Section 4.0 Phasing & Implementation, prior to the commencement of development a Water services plan for the Planning Scheme shall be prepared by the developers and agreed with Irish Water and South Dublin County Council. Such plans must comply with Irish Water standard details and codes of practice. Connection of infrastructure to a public waters services network is also subject to a connection agreement with Irish Water. It is considered that issues with regard to the location of private wells and water pressure can be addressed as part of these water services plans and also addressed as part of future planning applications for development on the SDZ lands.

Having further regard to the submissions made it is considered that additional text should be included in the Draft Planning Scheme to state that the provision of private wells and private waste





water facilities will be strongly discouraged and all new developments will be required to utilise and connect to public water and waste water infrastructure.

Chief Executive's Recommendation

It is recommended that the following amendment be made to the Draft Planning Scheme as follows:

Section 2.9.2 Water Supply

Connection of infrastructure to a public water services network is subject to a connection agreement with Irish Water. The provision of private wells will be strongly discouraged and all new developments will be required to utilise and connect to public water infrastructure.

Section 2.9.3 Foul Water Drainage

Connection of infrastructure to a public wastewater services network is subject to a connection agreement with Irish Water. The provision of private waste water facilities will be strongly discouraged and all new developments will be required to utilise and connect to public waste water infrastructure.

Strategic Environmental Assessment of Chief Executive's Recommendation

The additional text makes clear that private wells or waste water facilities are not supported and are actively discouraged through the Planning scheme and this strengthens and supports a number of SEOs including Material Assets, Water SEOs and indirectly population and human health.

Appropriate Assessment Screening of Chief Executive's Recommendation

No significant adverse impacts on European sites within the SDZ's zone of influence are predicted.

2.9.4 Strategic Flood Risk Assessment

- 1. The site is known to flood. This could have implications for people buying properties in the area. (<u>DraftClonSDZ0036</u>, <u>Paula Regan</u>)
- 2. Flood protection of canal should be put in place as it is likely to flood in the future. (DraftClonSDZ0041, Jonathan Kavanagh)
- 3. Submission notes the recent CFRAM report in relation to the Liffey and the concern that the Liffey without work from the OPW, may become an issue into the future for flooding again. The Clonburris development, which is to be built on an existing flood plain, will discharge into both the Camac and the Griffeen rivers and so the risks to Lucan Village rise. The submission requests that all new attenuation in this development is reassessed and the impact of extra discharge is calculated all the way through Lucan Village and into the River Liffey. Please ensure that a successful project in Clonburris does not negatively impact on the Griffeen system. It is hoped that although different agencies are involved, an overview of additional risk to Lucan and the Liffey are taken into consideration. (DraftClonSDZ0164, Gerard Kenny)
- 4. The proposed lands are a flood trap (<u>DraftClonSDZ0591</u>, <u>Margaret Madden</u>)

Chief Executive's Response

A Strategic Flood Risk Assessment (SFRA) was prepared for the Draft Planning Scheme in accordance with the Planning System and Flood Risk Management Guidelines (OPW/DoEHLG, 2009). The SFRA concludes that there is no overlap between vulnerable land uses within the Planning Scheme and Flood Zone A or B. The SFRA also concludes that there is also no existing development that is at potential risk of flooding. South Dublin County Council is satisfied that the SFRA has had adequate





regard to the CFRAM study and it will further inform the development of the required Surface Water Management Plan.

In accordance with Section 4.0 Phasing & Implementation, prior to the commencement of development, strategic district level measures and detailed design shall be prepared by the developers and agreed with South Dublin County Council through a Surface Water Management Plan to implement the prepared Surface Water Strategy. The Surface Water Management Plan will also address any issues with regard to local water courses, including the Griffeen River.

Having regard to submission relating to flood protection of the Grand Canal, the risk presented by the Canal has been investigated both in terms of its current operation and under breach conditions. It is noted that Section 2.2 of the SFRA states, "the canal is now operated as a leisure amenity and is owned and administered by Waterways Ireland. The section of the canal within the SDZ has 2 no. lock gates, a lock gate cottage and a unique form of overflow system which takes water from the west of the 11th lock, runs parallel to the north of the canal and re-enters the main waterbody to the east of the 9th lock. This system ensures that the canal does not overflow (the canal system and the associated Cappagh Overflow is a self-contained waterbody)". Furthermore, Section 4.6 of the SFRA goes on to explore the residual impacts and risk of flooding from the Grand Canal under a breach scenario. The canal embankment is in good condition and the likelihood of breach is low. Regular monitoring and the design considerations recommended within the SFRA will ensure that the risk is managed appropriately.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.

2.9.5 Surface Water Drainage & Sustainable Urban Drainage Systems (SUDS)

- 1. Lakes or ponds are shown on the SDZ plans and this could affect house insurance. The location of lakes or ponds as shown on SDZ plans could affect the safety of children playing in the area (DraftClonSDZ0027, Audrey Molloy)
- 2. Submission from Clondalkin resident notes the provisions of the Planning Scheme for use of grey water and suggests further solutions for capturing rainwater in parks and on roofs including food production, planting, and greenhouses. Suggestions are also included in relation to reducing water use and composting such as the composition of toilet facilities, agriculture and urban permaculture. (DraftClonSDZ0358, Eoin Ó Broin)
- 3. No specific details have been provided within the Planning Scheme in relation to need for the proposed pond in Barony Park North to be of the size indicated. No details of size, maintenance or construction costs are provided. More information should be provided, particularly in the context of overall cost of infrastructure, funding infrastructure and cost equalisation, a detailed examination of need, scale and costing of this infrastructure is provided at the next stage, with the balance of any reduction to be devoted to additional residential area. (DraftClonSDZ0335, Dietacaron)
- 4. All dwellings in the new development should be required to have a rainwater harvesting system which could supply water for toiles; this would reduce the extra pressure on the water infrastructure in the area. (DraftClonSDZ0505, Paula Kelly)

Chief Executive's Response

The Surface Water Strategy for the Draft Planning Scheme prioritises the sustainable management of surface water, to ensure that there is no unacceptable residual risk of flooding to each development site, mitigating against increased flood risk up or downstream from each development site, and to





manage the amount of surface water entering the local piped sewer system and watercourses, including the Griffeen and Camac Rivers.

The Surface Water Strategy includes a range of measures with regard to areas of public realm and open spaces, including ponds and wetlands. The type, design and exact location for the pond attenuation areas is required to be agreed at detailed design stage. This is in accordance with Section 4.0 Phasing and Implementation, which requires that prior to the commencement of development, strategic district level measures and detailed design shall be prepared by the developers and agreed with South Dublin County Council through a Surface Water Management Plan to implement the prepared Surface Water Strategy. The Surface Water Management Plan will provide additional necessary design details on the final range of measures selected in association with the development of the SDZ lands, including ponds / wetlands, rainwater harvesting systems and other localised measures.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.

2.9.8 Energy and Climate Change Mitigation

- Submission outlines that building should be built to the highest energy performance rating
 i.e. solar panels and any connection to local ESB or gas networks should be secondary.
 (<u>DraftClonSDZ0041</u>, <u>Jonathan Kavanagh</u>)
- 2. Submission from Clondalkin resident highlights concern in relation to reliance on fossil fuels (natural gas) in terms of greenhouse gas emissions, global warming, and price of carbon and security of supply. (DraftClonSDZ0358, Eoin Ó Broin)
- 3. Conservation Society suggests that there should be more specific and stronger emphasis on using recycled and environmentally careful materials such as certified timber, timber-framed houses and eco-cement. It is also advised that solar panels, rainwater harvesting systems, group heating systems, passive heating or zero energy houses be utilised as much as possible. (DraftClonSDZ0415, Sinéad Ní Bháin, South Dublin Conservation Society)
- 4. Energy production issues in Grange Castle Business Park relating to temporary gas generating units. Energy supply to the SDZ should be considered given the limited capacity in the area. (<u>DraftClonSDZ0234</u>, <u>Fiona Byrne</u>, <u>HSE Environmental Health</u>)
- 5. Submission outlines hope that the houses will be energy efficient with ability to link to national grid and with solar panels and high insulation standards. (<u>DraftClonSDZ0500</u>, <u>Declan Hanley</u>)
- 6. The EirGrid submission highlights that the site of the consented line tower interface compound has not been considered in the draft scheme, which indicates an urban block with avenue frontage at this location. EirGrid requests that the Draft Planning Scheme is redrafted to facilitate this piece of critical transmission infrastructure. EirGrid wishes to remind the Council that the permitted development was the subject of extensive consultation with local communities and statutory consultees and the final site of the interface compound was determined to be the optimum location. This was subsequently endorsed by An Bord Pleanála in its decision to grant planning permission in March 2017. In addition, disposal of the site for the substation was recently approved by South Dublin County Council at a meeting in April 2017.
 - In relation to the remainder of the overhead transmission line to the east of the tower interface compound, EirGrid wishes to highlight that there are currently no proposals to underground this part of the transmission network. The inference in the Draft Planning Scheme that certain development can occur following the undergrounding of this powerline





is misleading and should be removed or reworded. (DraftClonSDZ0311, Tomas Bradley, EirGrid plc)

- 7. Submission from ESB Networks outline that a new 110kV/MV station will be required to provide for the electricity needs of the area and to support the sustainable economic and social development of the Clonburris SDZ. ESB Networks require a suitable site to be made available for the 110kV/MV substation and requests the Council to consider how the substation may be best catered for including the necessary HV and MV cabling associated. (DraftClonSDZ0510, Stephen O'Reilly, ESB Networks)
- 8. The high voltage power lines should be buried underground. (DraftClonSDZ0505, Paula Kelly)
- 9. Submission welcomes that the provision of electricity infrastructure will be made in consultation with ESB networks, SDCC and other stakeholders. (DraftClonSDZ0510, Stephen O'Reilly, ESB Networks)

Chief Executive's Response

The Draft Planning Scheme prioritises the development of a sustainable energy community at Clonburris, this is reflected in the Energy Masterplan that accompanies the Draft Planning Scheme, prepared in partnership with the Sustainable Energy Authority of Ireland (SEAI).

Having regard to submission made relating to energy efficiency and building design, it is noted that the energy efficiency and renewable energy requirements for the construction of new homes and non-residential buildings are primarily addressed in the current Building Regulations Part L (2008 and 2011). With regard to new homes to be constructed on the SDZ lands, the Building Regulations prescribe requirements with regard to thermal performance, overall energy use and CO2 emissions. The regulations also require that a reasonable proportion of the energy consumption to meet the energy performance of a dwelling is provided by renewable energy sources, this includes solar panels.

Having regard to future revisions to the Building Regulations, it is anticipated that by 2020 all new buildings in Clonburris will be required to be constructed to the Nearly Zero Energy Buildings (NZEB) standard, in accordance with the EU Energy Performance in Buildings Directive (EPBD). This standard will ensure that new buildings are constructed to a high level of thermal efficiency, with a significant contribution of renewable energy on site.

Having regard to concerns raised relating to greenhouse gas emissions, global warming, price of carbon and security of supply, it is noted that the Clonburris Energy Masterplan identifies a range or low carbon and renewable energy options linked to the future, phased development of the SDZ lands. For example, within the core areas of the Clonburris and Kishoge urban centres, local energy networks initially based on Gas Combined Heat and Power (CHP) are potentially viable, when compared to a traditional individual gas boiler scenario. Other options such as Water Source Heat Pumps (WSHP) and Biomass could be viable in the future, with the introduction of the expected national Renewable Heat Incentive (RHI). These alternative options on the SDZ lands, aim to reduce long term reliance on fossil fuels, de-carbonise existing energy systems and ultimately lower greenhouse gas emissions in South Dublin County.

An Energy Masterplan has recently been completed for Grangecastle Business Park, in response to the recommendations of the Clonburris SDZ Energy Masterplan. The findings and recommendations of the Grangecastle Business Park Energy Masterplan, with regard to potential for local waste heat capturing and distribution, will be further explored in the context of development of the Kishoge and Clonburris urban centres, aligned to the phased delivery of the SDZ.





There is a range of building design options available, which may include certified timber, timber-framed houses and eco-cement. It is considered that these and other suitable design options can be considered at detailed design stage and as part of planning applications for development on the SDZ lands.

South Dublin County Council is aware of and supports the Eirgrid West Dublin project and the Strategic Infrastructure Development (SID) permission, as granted by An Bord Pleanála. It is considered that the Draft Planning Scheme does not negate the development of a line tower interface compound on the SDZ lands, and its development can be provided for in consultation with EirGrid.

Having regard to the remainder of the overhead transmission line to the east of the tower interface compound, it should be noted that the Draft Planning Scheme accounts for the future possible undergrounding of this section of the network, to provide for a holistic and long term development approach to the SDZ lands and in consideration of best practice urban design and masterplanning principles. In response to the Eirgrid submission it is considered that additional wording should be added to Table 4.6 Local Level Requirements Table, of the Planning Scheme to state that undergrounding of the overhead transmission line at this location will be considered on an incremental, site by site basis, as appropriate to accommodate development and shall be agreed with South Dublin County Council, Eirgrid and other relevant stakeholders, as required.

The submission from ESB networks is noted and the provision of a new 110kV/MV station on the SDZ lands, can be delivered as required, in collaboration with a range of stakeholders, including ESB Networks and EirGrid.

Chief Executive's Recommendation

It is recommended that the following amendment be made to the Draft Planning Scheme Table 4.6 Local Level Requirements Table, as follows:

Under the Existing Power Lines Undergrounding of the 220 kv from Grange Castle Road eastwards row in Table 4.6, the following shall be added to the Development Area Restricted column:

This phasing requirement is only applicable for the section of Kishoge North East Development Area within the existing wayleave.

This will be considered on an incremental, site by site basis, as appropriate to accommodate development and shall be agreed with South Dublin County Council, Eirgrid and other relevant stakeholders, as required.

Strategic Environmental Assessment of Chief Executive's Recommendation No interaction with Strategic Environmental Objectives.

Appropriate Assessment Screening of Chief Executive's Recommendation

No significant adverse impacts on European sites within the SDZ's zone of influence are predicted.

2.9.9 Waste Management and Recycling Facilities

 Consideration should be given to the quantity and types of waste that may be generated from the site, both during the construction and operational phases of development. (<u>DraftClonSDZ0234</u>, <u>Fiona Byrne</u>, <u>HSE - Environmental Health</u>)





- Submission outlines that generous recycling facilities should be available and the use of 'Big Belly bins' investigated. (<u>DraftClonSDZ0502</u>, Ed O'Brien & John Curran TD, Fianna Fail Dublin Mid West)
- 3. A comprehensive waste management plan should be included in relation to housing, retail and industry. (<u>DraftClonSDZ0504</u>, <u>South Dublin County PPN</u>, <u>South Dublin County Public Participation Network</u>)

Chief Executive's Response

The Draft Planning Scheme acknowledges that waste reduction and recycling needs to be fully considered and implemented in the design, construction and operational phases of the Planning Scheme. Furthermore, Section 2.9.9 Waste Management and Recycling Facilities of the Draft Planning Scheme states that the recycling of waste shall be encouraged in accordance with the Eastern Midlands Regional Waste Management Plan 2015-2021.

Having regard to submissions made and the provision of recycling facilities, it is noted that the Draft Planning Scheme prioritises high quality and accessible refuse storage and recycling facilities for both residents and the public realm. A range of facilities can be provided at Clonburris in consideration of regional and national policy and guidance, which may include innovative options i.e. pneumatic waste systems at the Kishoge and Clonburris urban centres.

In accordance with Section 2.9.13 Construction Environmental Management Plans, a CEMP shall be prepared in advance of the physical elements proposed as part of the Planning Scheme and will be implemented throughout.

In consideration of submissions made, it is considered that issues regarding waste and recycling management are adequately addressed in Section 2.9.9 Waste Management and Recycling Facilities of the Draft Planning Scheme.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.

2.9.12 Noise

- Concern raised in relation to the noise impact as a result of increased car, bus and construction traffic on the R136 (<u>DraftClonSDZ0034</u>, <u>Noise Pollution</u>, <u>Lucan Noise Pollution</u> <u>Solution DraftClonSDZ0040</u>, <u>Foxborough Residents Group Lucan</u>, <u>Foxborough Residents</u> <u>Group</u>)
- 2. Submission from CIE advises that the Dublin Agglomeration Environmental Action Plan 2013 2018 is insufficient with regards to the assessment of noise impact of the railway and major roads. It is advised that it should be a requirement of the draft Planning Scheme for the engagement of noise consultants during the design process with regard to development proposals adjacent to the railway corridor. It is submitted that this will help ensure and provide for the protection of developments from unwanted noise (including night time rail maintenance) together with noise mitigation measures. It is also advised that a development acoustic strategy should be considered to provide guidance. (DraftClonSDZ0295, Aidan Ruane, CIE Group Property Management DraftClonSDZ0346, Aidan Ruane, CIE Group Property Management)
- 3. Lucan resident raises concern in relation to noise pollution along the R136. (DraftClonSDZ0353, Stephen O' Rafferty)
- 4. Noise from the new road beside the Lucan East Educate Together primary school is a concern. (<u>DraftClonSDZ0102</u>, <u>Eddie Fox</u>, <u>Lucan East Educate Together NS</u>)





- 5. Foxborough Downes / Drive visitors are concerned about the noise pollution from the R136, this will be a main road into Clonburris. (DraftClonSDZ0224, Valerie Mcneill)
- 6. Noise from the development is likely to impact on surrounding areas during the construction phase of the development. Baseline Noise monitoring data should be undertaken as part of the noise section in the Environmental Impact Assessment Report. Consideration should be given to ongoing noise monitoring at Noise Sensitive Locations during the construction phase to assess the impact of noise and vibration from the project. (DraftClonSDZ0234, Fiona Byrne, HSE Environmental Health)
- 7. The impacts of noise from Grange Castle Business Park, which is close to the lands, should be considered at this stage of the SDZ and in an EIAR. (<u>DraftClonSDZ0234</u>, <u>Fiona Byrne</u>, <u>HSE Environmental Health</u>)
- 8. The impacts of noise from increased use of roads and the railway line should be assessed using noise modelling and mitigation measures should be considered including boundary treatments and glazing on housing units. (DraftClonSDZ0234, Fiona Byrne, HSE Environmental Health)
- 9. Although construction noise and vibration are temporary, they can be very intrusive. As such, mitigation measures must be considered for all noise sources during construction and thereafter. Start and finish dates and times should be clearly set out to minimise noise pollution complaints. (DraftClonSDZ0234, Fiona Byrne, HSE Environmental Health)

Chief Executive's Response

Submissions made raise issues with regard to the development of the SDZ lands and associated noise impact of existing roads, proposed new roads, public transport corridors and adjoining development areas, including Grange Castle Business Park.

It is stated in the Draft Planning Scheme that new development proposals at Clonburris shall have regard to the Dublin Agglomeration Environmental Noise Action Plan 2013-2019. It should be noted that it is beyond the scope of the Draft Planning Scheme, to make recommendations on the contents of this Action Plan. It is noted that the Planning Scheme will have regard to any future iterations of this Action Plan.

It is also a requirement of the Draft Planning Scheme that development proposals with the potential to give rise to significant noise impacts may require a Noise Impact Assessment and associated mitigation plan to minimise noise disturbances and protect the amenities of the area. It is considered that this can be addressed at detailed design stage and on a case by case basis, as part of planning applications for development on the SDZ lands. This can include collaboration with other relevant stakeholders, including Irish Rail having regard to any potential noise impact from public transport corridors including the railway line.

Having regard to potential noise arising from the construction phase of the development of the SDZ lands, it is noted that in accordance with Section 2.9.13 Construction Environmental Management Plans, of the Draft Planning Scheme, a CEMP shall be prepared in advance of the physical elements proposed as part of the Planning Scheme and will be implemented throughout. This shall include details of appropriate mitigation measures for noise and monitoring of such levels.

Having regard to the submissions made, it is considered that issues related to noise and associated impacts are adequately addressed in Section 2.9.12 Noise, of the Draft Planning Scheme.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.





2.9.13 Construction Environmental Management Plans

- There is a concern for removal of toxic asbestos and lead from the SDZ lands.
 There is a concern for noise and disruption to residents during construction phase.
 (DraftClonSDZ0023, sean gillen)
- 2. There is a concern for insufficient and unsafe foundations to build near the Grand Canal. There is a concern for vermin problems during the construction phase, due to land being turned and the close proximity to the Grand Canal. (<u>DraftClonSDZ0023</u>, sean gillen)
- 3. There are a lot of new families with young children in the Ashwood estate, the noise that could be caused from building and road works could prove problematic. (DraftClonSDZ0026/DraftClonSDZ
- 4. There is a concern for disruption during construction works particularly with regard to children playing in the area. (DraftClonSDZ0027, Audrey Molloy)
- 5. Lucan resident highlights concerns in relation to construction noise and pollution while querying what mitigation measures will be put in place. (DraftClonSDZ0098, DraftClonSDZ0099, Tanya McDonald Donnelly)
- 6. Dust abatement mitigation measures should be included in a Construction Environmental Management Plan (<u>DraftClonSDZ0234</u>, <u>Fiona Byrne</u>, <u>HSE Environmental Health</u>)
- 7. Pest control procedures form part of a Construction Environmental Management Plan as works could result in the displacement and movement of the rodent population in the area. (DraftClonSDZ0234, Fiona Byrne, HSE Environmental Health)
- 8. Consideration should also be given to the possible impacts of construction site pollutants to ground water and to the Grand Canal and how these possible mitigation measures.

 (DraftClonSDZ0234, Fiona Byrne, HSE Environmental Health)

Chief Executive's Response

Submissions made raise issues including general disruption, removal of toxic asbestos and lead, site pollution, impact on ground water, noise and dust abatement, foundations near the Grand Canal, vermin and pest control and safety.

It is noted that in accordance with Section 2.9.13 Construction Environmental Management Plans (CEMP), of the Draft Planning Scheme, a CEMP shall be prepared in advance of the physical elements proposed as part of the Planning Scheme and will be implemented throughout. The plans are also required to incorporate a range of relevant mitigation measures.

The issues raised in submissions can be addressed as part of CEMPs to be submitted to South Dublin County Council. The Draft Planning Scheme also requires that all construction and maintenance works to be undertaken on the SDZ lands are to be undertaken in accordance with a range policy and guidance documents. Having regard to the removal of any toxic asbestos and lead from the SDZ lands, if these materials are discovered on site as part of the construction phase of development, their appropriate and safe removal would form part of the CEMP to be agreed with South Dublin County Council.

With regard to development and foundations near the Grand Canal, it is considered that these matters can be addressed on a case by case basis and as part of the detailed design stage of any relevant proposals for development adjacent to the Grand Canal, and taking cognisance of setbacks from the Grand Canal proposed Natural Heritage area (pNHA), as currently proposed in Section 2.3 Green and Blue Infrastructure of the Draft Planning Scheme.

Clonburris



Having regard to the submissions made, it is considered that the issues raised are adequately addressed in Section 2.9.13 Construction Environmental Management Plans, of the Draft Planning Scheme.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.





Section 2.10 Landscape and Open Space

- 1. There is a concern for a reduction in open green space surrounding existing residential estates. (DraftClonSDZ0023, sean gillen)
- 2. The location of the SDZ would mean the loss of green areas for local residents, local children would be losing a place to play. (<u>DraftClonSDZ0026</u>, <u>Sarah Cleary</u>)
- 3. The proposed open spaces appear to be consisting of lands which cannot be developed as they are a flood plain, this will lead to over dependency on existing park facilities.

 (DraftClonSDZ0040, Foxborough Residents Group Lucan, Foxborough Residents Group)
- 4. No allotments space even though there is a canal running through the area. Allotments contribute to sustainable development and people in the area working on projects would help with antisocial problems. (DraftClonSDZ0084, Corey Sammon)
- 5. There is a need for safe and useful public spaces, cycle lanes, walkways, parks and areas for walking dogs, picnics etc. Delays in the provision of such services should be avoided in the future development of the area. (DraftClonSDZ0055, Ellen Ward)
- 6. Submission on behalf of Ahmadiyya Muslim Association Ireland outlines there appears to be an imbalance in the plan in the following areas: There appears to be an over-reliance on the western end of the plan area for the provision of open and amenity space for the SDZ area. There is a natural flow between the existing park and the lands to the east of Hayden's Lane and the inclusion of our lands at Haydens Lane does not appear to be critical to the success or viability of the strategy. (<u>DraftClonSDZ0342</u>, <u>Muhammad Anwar Malik</u>, <u>Ahmadiyya Muslim Association</u>)
- 7. Submission outlines concerns that open spaces provided within the Clonburris SDZ appear to be consisting primarily of lands which cannot be developed as they are a flood plain. This means that it is reasonable to say that Clonburris residents will primarily make use of existing parks, putting further strain on already poorly provided or maintained areas. The lack of commitment for provision of community amenities such as this within the current draft plan further demonstrates the lack of forward planning in the current draft plans (DraftClonSDZ0370, Shirley Clarke)
- 8. Submission from Clondalkin resident suggests the provision of an outdoor swimming area as an alternative for those that swim in the canal in hot weather and a maze.

 (DraftClonSDZ0358, Eoin Ó Broin)
- 9. The development of playing fields to be used by all the children in the area is considered very important. There will be over 2,500 children attending schools between Lucan East Educate Together primary school, Griffeen Valley ETNS, Kishoge CC and Griffeen Community College. It is imperative that playing fields and community facilities are within easy reach of schools so that there is not a dependence on bussing children to matches within the Lucan area and to encourage the well-being and health of all families living in the area. Playing fields/all weather pitches are requested as they would be playable all year. Local clubs such as Lucan Sarsfield are willing to create blitzes etc. for local schools, to encourage child participation in afterschool sports, but there no local central, communal pitch to use. Running is becoming an exercise that a lot children and adults are using to take care of their body and mental health. A running track around the pitch would be of benefit to the whole community for community games etc.
 - (<u>DraftClonSDZ0102</u>, Eddie Fox, Lucan East Educate Together NS)
- 10. Submission from Adamstown Cricket Club requesting confirmation that cricket is included as a community sport as denoted in the key principle in Section 2.10 Landscape and Open Space:
 - "Provide recreation facilities and open spaces that are capable of accommodating a range of community sport and recreation needs and use by the community at varying times including





after school hours. "

(DraftClonSDZ0361, Olag Sivanantham, Adamstown Cricket Club)

- 11. Submission requests marking of a dedicated cricket grounds within the SDZ active recreational area. Cricket needs a dedicated area measuring at 120mx120m (meters). With the growth of the sport in the country and interest of cricket in the area as demonstrated by the growth of Adamstown Cricket Club there is a clear need to layout the installation of cricket playground(s) within the Clonburris SDZ. Submission requests Table 2.10.1 Design Criteria for open spaces be amended to include requirement for the installation of a purpose built cricket ground with changing, tea making and storage facility to meet the demands of the existing community and new community in Clonburris. (DraftClonSDZ0361, Olag Sivanantham, Adamstown Cricket Club)
- 12. Submission outlines that the plan should look at the big picture and satisfy the needs of existing sports clubs in Adamstown and Lucan. (DraftClonSDZ0361, Olag Sivanantham, Adamstown Cricket Club)
- 13. The Department of Culture, Heritage and the Gaeltacht submission states that the Griffeen River also forms an important ecological corridor. In any proposals for public open space, such as the Griffeen Valley Park and Grand Canal Park, care must be taken to ensure that the waterways and hedgerows still function as ecological corridors. It is noted that with regard to the Grand Canal corridor it is stated on page 83 that it is an objective of the scheme to enhance the biodiversity and ecological character of the pNHA.

 (DraftClonSDZ0300, Manager Dau, Dept. of Arts, Heritage and the Gaeltacht)
- 14. Submission from South Dublin County Disability Advisory and Consultative Panel outlines that play space and playgrounds should be accessible to children of all abilities (DraftClonSDZ0503, Selina Bonnie)
- 15. Submission outlines that the Griffeen Valley Park extension should endeavour to be a park of green Flag standard
 Submission requests that space should be created for a varied and diverse range of sporting and recreational activities, including a multi-use, all weather facility,
 (DraftClonSDZ0502, Ed O'Brien & John Curran TD, Fianna Fail Dublin Mid West)
- 16. Submission outlines that a community garden and allotments should be provided. (DraftClonSDZ0500, Declan Hanley)
- 17. The Canoeing Ireland submission states that the draft scheme does not address the enormous potential of the approximately three kilometres of the Grand Canal, which spans the entire length of the new housing area, to add water-based recreation (including canoeing, stand-up paddle boarding and rowing) to the mix of facilities which would provide very valuable active recreational outlets to the residents of the SDZ area and the wider existing communities bounding the zone. The submission also states that Waterways Ireland who control the Grand Canal are very supportive of the development of canoeing infrastructure on the waterway. (DraftClonSDZ0325, Paddy Boyd, Canoeing Ireland)
- 18. The Canoeing Ireland submission states that the Griffeen Valley Park extension provides for surface-water attenuation ponds to the north-west, fed by the proposed SUDS system. These areas should form high quality, water based ecological landscapes and could also have potential for water-based, active recreational use. The ponds could also at some future date, subject to feasibility, evaluation and funding, form the supply source for the construction of a pumped wild water recreation park. (DraftClonSDZ0325, Paddy Boyd, Canoeing Ireland)
- 19. The Canoeing Ireland submission states that management and councillors of SDCC should incorporate into the final scheme, a recognition of the recreation and amenity value of the Grand Canal for active water-based and specifically canoeing uses and incorporate a requirement that a suitable club structure and entry steps / pontoon be addressed by





developers in subsequent design considerations at planning application stage. (DraftClonSDZ0325, Paddy Boyd, Canoeing Ireland)

- 20. The area between the new school at Griffeen and the new community centre should have playing fields to be used both by the community centre and the schools. (DraftClonSDZ0434, Nathaniel Doyle)
- 21. The largest greenway is an area of floodplain which may not be useable due to the increase of load from the proposed houses and roads. (<u>DraftClonSDZ0434</u>, <u>Nathaniel Doyle</u>)
- 22. It will have to be clear that the wetland is functional open space. Experience elsewhere indicates that authorities tend to dismiss constructed wetlands as functional open space and at development management stage require alternative lands and/or additional contributions in lieu. (DraftClonSDZ0335, Dietacaron)
- 23. A multi-use games area/space for both children and adolescents is required. Facilities should be provided and shared between local GAA, FAI and IRFU to maximise usage of space and bring together varied funding. (DraftClonSDZ0504, South Dublin County PPN, South Dublin County Public Participation Network)
- 24. Playgrounds should be locked at night and have high fences to avoid antisocial behaviour. (DraftClonSDZ0505, Paula Kelly)
- 25. With regard to landscaping, consideration should be given to the planting of evergreen trees, to prevent the uplifting of public pathways and roadways. (DraftClonSDZ0515, Christopher Conway)

Chief Executive's Response

Open space and recreational facilities will be central to the delivery of Clonburris as a sustainable community. The Draft Planning Scheme has been prepared with the aim of achieving a balanced provision of a new high quality, urban residential environment, and providing attractive, interesting and well used outdoor spaces with active, inviting public space.

Over 90 hectares of open space will be provided as part of the Draft Planning Scheme. The main active outdoor recreation facilities will largely be accommodated in the three main parks on the SDZ lands: the extension to Griffeen Valley Park, Grand Canal Park and Barony Park. The facilities in the main parks will be complemented by local play facilities, to be provided in the local open spaces.

The Draft Planning Scheme requires a Parks and Landscape Strategy (PLS) to be prepared by all the developers, for the entire SDZ lands prior to the commencement of development. The Parks and Landscape Strategy will set out the design and uses for each of the parks and open spaces and will include details of proposed active recreation uses i.e. playing pitches, playgrounds and other details such as allotments and planting. The Department of Cultural, Heritage and the Gaeltacht submission states that in any proposals for public open space, such as the Griffeen Valley Park and Grand Canal Park, care must be taken to ensure that the waterways and hedgerows still function as ecological corridors. The PLS will include a Biodiversity Management Plan and it is a key requirement of such to enhance the biodiversity value of SUDS measures where relevant and these should be included in habitat management plans.

A number of submissions raised the issue relating to proposed open spaces to be used for surface water attenuation including ponds and wetlands. A Surface Water Strategy was prepared as part of the Draft Planning Scheme. In addition, prior to the commencement of development, a Surface Water Management Plan shall be prepared detailing how the surface Water Strategy will be implemented. It is an objective of the Strategy to ensure that the drainage design of water attenuation areas are integrated into the public open space and public realm to achieve high quality





multi-functional spaces. As such, this issue will be addressed in the Surface Water Management Plan.

One submission suggests that the Scheme should recognise the recreation and amenity value of the Grand Canal for active water-based and specifically canoeing uses and incorporate a requirement that a suitable club structure and entry steps / pontoon be addressed by developers in subsequent design considerations at planning application stage. As noted above, a Parks and Landscape Strategy will be prepared prior to commencement of development however any development that would impact on the environmental sensitivity of the Canal should be avoided.

Chief Executives Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.





Section 2.11 Biodiversity and Natural Heritage

2.11.2 Biodiversity and Natural Heritage Features

- 1. The development will result in wildlife habitats being disrupted and disturbed for hawks, rabbits, birds near the Grand Canal. (DraftClonSDZ0023, sean gillen)
- 2. The fields in Clonburris little (south of Balgaddy) to the canal are full of buzzards, rabbits, birds, wildlife, old school hedgerows, hawthorn trees and old townlands when you walk the fields it feels like you are in the countryside. It would be a shame to cut nature out completely from this development, it would be nice to keep the old school farm/country feel and strike a balance between the need for houses for humans and a space for nature. Aim to maintain the existing trees and hedgerows. Do not build in straight lines, with all the same style. Old farmhouse style for some developments that could perhaps incorporate wildlife in some way. Schools could incorporate learning from the wildlife around them. (DraftClonSDZ0009, Aoife McKenna)
- 3. Concerns outlined in relation to the potential impacts of the Planning Scheme on the environmental quality of the Griffeen River and Kilmahuddrick Stream in terms of disturbance from construction activity, building height and proximity of development. (DraftClonSDZ0096, Laura Flanagan DraftClonSDZ0100, Frances Norton DraftClonSDZ0216, LIONA O'TOOLE DraftClonSDZ0191, Rafal Marzec DraftClonSDZ0204, William Lavelle DraftClonSDZ0352, Rita O'Brien DraftClonSDZ0101, Peter Kelly DraftClonSDZ0184, Barry Jenkinson DraftClonSDZ0185, Hazel Smyth DraftClonSDZ0497, Owner/ Occupier DraftClonSDZ0423, Damien Moloney DraftClonSDZ0424, John Coleman DraftClonSDZ0546, Sandra Coleman DraftClonSDZ0540, John McGivney, Finnstown Abbey Residents Association)
- Resident objects to development along the Canal by reason of impact on wildlife including bats, obstruction of views of the Clondalkin Round Tower from the 11th Lock, removal of green belt, anti-social behaviour. (<u>DraftClonSDZ0244, roisin domican</u>)
- 5. Submission from CIE makes reference to the key principle of developing a green and blue infrastructure network and advises that CIE retains its rights to maintain the railway corridor and conduct periodic vegetation clearance in order to operate a safe and efficient railway service. It is advised that, in the interest of safety and maintenance, the species schedule along the railway corridor shall be subject to agreement with CIE together with a maintenance schedule for vegetation. It is also advised that there should be no impedance of drainage/flood attenuation for the railway line and secure fencing shall be a minimum requirement along the full length of the railway corridor. (<u>DraftClonSDZ0295</u>, <u>Aidan Ruane</u>, <u>CIE Group Property Management</u> <u>DraftClonSDZ0346</u>, <u>Aidan Ruane</u>, <u>CIE Group Property Management</u>
- 6. Submission outlines that the canal area has a vast and growing family of animals in the canal and the surroundings areas. This needs to be considered especially when it comes to the build at ashwood as there are protected bat species living in this area. (DraftClonSDZ0275/Bachel Kavanagh)
- 7. Submission requests reconsidering this preposterous scheme on the basis of protecting biodiversity. The 'wild' fields are a natural nature reserve for all kinds of animals and it is a beautiful area for walkers, photographers, wildlife enthusiasts and bird watchers. The Council spent a great deal of money upgrading the canal with footpaths and environmentally friendly lighting for nearby roosting bats, and all this will have been in vain if the plan goes ahead. Submission outlines that the canal has the potential to bring in more tourism to the area and a great stop off point for visitors who can see the round tower from the canal, but not if the development goes ahead. (DraftClonSDZ0364, Ruth Mckenna)





- 8. Submission from Clondalkin resident notes that the Planning Scheme acknowledges protected species and the provisions for their protection. The opportunity to improve, enhance and increase otter and bat habitats rather than just protect these habitats is queried. (<u>DraftClonSDZ0358, Eoin Ó Broin</u>)
- 9. Conservation Society suggests that all the hedgerows, trees and other habitat areas along the canal corridor be kept as natural as possible. It is also suggested that the 50m buffer between development and the canal should apply all along the canal and similar provisions be applied to streams. Hedgerows should also be retained in green areas. (DraftClonSDZ0415, Sinéad Ní Bháin, South Dublin Conservation Society)
- 10. Funding should be ring-fenced for heritage projects at Clonburris so that these projects are not jettisoned at a later stage. (<u>DraftClonSDZ0221</u>, <u>Elaine Hurley</u>)
- 11. The Department of Culture, Heritage and the Gaeltacht submission states that the proposed development will increase the urban footprint on the landscape surrounding the Grand Canal. It is important to ensure biodiversity, and particularly protected species such as otters and bats, are adequately considered in any plans or projects arising from this SDZ. (DraftClonSDZ0300, Manager Dau, Dept. of Arts, Heritage and the Gaeltacht)
- 12. The Department of Culture, Heritage and the Gaeltacht submission notes and welcomes the inclusion of a setback from the boundary of the Grand Canal pNHA of 50 metres for all buildings and 30 metres for development. However, the documentation submitted needs to be checked and edited to ensure the setback from the boundary of the Grand Canal pNHA is correctly quoted as on page 37. In some places it is simply referred to as the setback from the Grand Canal, as opposed to from the Grand Canal pNHA boundary, such as on page 83. (DraftClonSDZ0300, Manager Dau, Dept. of Arts, Heritage and the Gaeltacht)
- 13. The Department of Culture, Heritage and the Gaeltacht submission notes that it is proposed to have two new bridges for pedestrians and cyclists over the Grand Canal and that all canal crossings will be designed to avoid fragmentation of linear habitats associated with the Grand Canal corridor, and there will also be a green bridge over the railway line. The procedures whereby there will be temporary and advance greening and a biodiversity plan, and that CEMPs will allow for ecological clerk of works at site investigation, preparation and construction phases are also welcome, as is the requirement for development proposals along the Grand Canal corridor to be accompanied by an ecological impact assessment undertaken by an appropriately qualified and experienced ecologist in line with CIEEM guidelines. (DraftClonSDZ0300, Manager Dau, Dept. of Arts, Heritage and the Gaeltacht)
- 14. The Department of Culture, Heritage and the Gaeltacht submission states that greenway routes need ecological assessment in their planning and design and should not target sensitive ecological sites or parts of sites, as such routes have potential for disturbance to habitats and species, including as a result of noise and lighting. (DraftClonSDZ0300, Manager Dau, Dept. of Arts, Heritage and the Gaeltacht)
- 15. The Department of Culture, Heritage and the Gaeltacht submission states that the current management regime along the southern bank of the towpath appears un-necessarily severe given its location within a pNHA. The Department recommends that the verges on either side of the cycle way could be mown less intensely than at present. This could enhance the southern banks value as a corridor for wildlife without negatively impacting on the recreational use of the cycleway.
 - As part of the landscaping for the Grand Canal Park opportunities should be taken to thicken up the hedgerow planted along the Grand Canal cycleway to the north of the Ashwood estate. If the agreement of Waterways Ireland is forthcoming, the planting of a certain number of standard trees along the southern canal bank, as found along some sections of the Grand Canal in the Dublin City Council area, would be beneficial for biodiversity. (DraftClonSDZ0300, <a href="https://manager.name.gov/Ma





- 16. The Department of Culture, Heritage and the Gaeltacht submission states that there is concerns with regard to impacts from disturbance from people, loss of habitat, and lighting, on both otters and bats, which are strictly protected by being placed on annex IV of the Habitats Directive. It is noted that five species of bats were recorded, of which two, Daubenton's bat and long-eared bat are considered particularly sensitive to artificial lighting. (DraftClonSDZ0300, Manager Dau, Dept. of Arts, Heritage and the Gaeltacht)
- 17. The Department of Culture, Heritage and the Gaeltacht submission states Impacts on water quality would also impact on freshwater crayfish, with are present in the canal and Griffeen River and listed on annex II of the Habitats Directive. (DraftClonSDZ0300, Manager Dau, Dept. of Arts, Heritage and the Gaeltacht)
- 18. The Department of Culture, Heritage and the Gaeltacht submission sates that there is over 30 kilometres of hedgerow/treeline on the lands at present. It appears unclear at this stage how much hedgerow will be lost and how much new planting will be made in mitigation, although section 7.10 of the SEA environmental report indicates that old barony hedgerows will be retained as well as those in a north south orientation. The key principle in this section, to protect and enhance townland and barony hedgerows, is welcome as such boundary hedgerows tend to be older and more biodiverse. One such example is the hedgerow along the Neilstown Cappagh townland boundary identified as having a high biodiversity value in South Dublin County Council's Urban Development Framework Clonburris SDZ Eco-District Biodiversity Study of February 2010. It would appear that current proposals are only for small sections of this hedge to be retained. It is recommended that consideration should be given to re-design the layout of the development in it vicinity so that longer sections of this hedge could be retained. (DraftClonSDZ0300, Manager Dau, Dept. of Arts, Heritage and the Gaeltacht)
- 19. The Department of Culture, Heritage and the Gaeltacht submission recommends that there should be on-going monitoring of the bat population, before, during and after construction by a bat specialist, so that good baseline data is gathered which can be compared to population data in the future and lighting modified as necessary. This is particularly important since bat friendly lighting was installed along the Grand Canal cycleway when it was initially constructed, but has not been adequately monitored. Consideration should be given to turning lighting off for certain periods during the night, as is currently being considered for the proposed Dodder Greenway. (DraftClonSDZ0300, Manager Dau, Dept.of Arts, Heritage and the Gaeltacht)
- 20. The Department of Culture, Heritage and the Gaeltacht submission states that planning the proposed access routes onto the towpath and the positioning of the proposed footbridges across the canal, the location of the three existing artificial otter holts installed along the northern towpath as part of the Grand Canal cycleway, scheme should be taken into account. (DraftClonSDZ0300, Manager Dau, Dept. of Arts, Heritage and the Gaeltacht)
- 21. The Department of Culture, Heritage and the Gaeltacht submission states that there should be on-going monitoring of the otter population, before, during and after construction, by an otter specialist, so that good baseline data is gathered which can be compared to population data in the future and mitigation measures put in place as necessary. It is recommended that the area included in the otter surveys should include the entire section of the Grand Canal within the South Dublin County Council area, from Park West at Gallanstown beside the M50 to Hazelhatch, and also the entire course of the Griffeen River. The effectiveness as otter refuges of the artificial holts installed along the Grand Canal as part of the cycleway scheme, and the River Griffeen as part of the establishment of the Grange Castle Business Park, could then be assessed. (DraftClonSDZ0300, Manager Dau, Dept. of Arts, Heritage and the Gaeltacht)
- 22. Submission concerned about the impact on wildlife on the canal walk way. Building will push wildlife from the canal, including bats. (<u>DraftClonSDZ0560</u>, <u>Sandra McLoughlin</u>





- <u>DraftClonSDZ0561, Tara Jenkins</u> <u>DraftClonSDZ0562, John McLoughlin</u> <u>DraftClonSDZ0563, Tracey Boland DraftClonSDZ0602, Catherine Scanlon DraftClonSDZ0603, Vincent Scanlon</u>)
- 23. The Clonburris SDZ is likely to have a negative impact on the environment and landscape. It will disturb the existing habitats and wildlife on the SDZ lands. (DraftClonSDZ0515, Christopher Conway)
- 24. The area of Clonburris Great Parkland, south of the Grand Canal, is rich in biodiversity, the proposed development on the SDZ lands will have a negative impact on local biodiversity and protected species. (DraftClonSDZ0514, The Tracey Family)

2.11.3 Place Names

- Submission from Clondalkin resident favours the use of existing place names but highlights concerns in relation to the use of the name Barony Park for historic reasons. (DraftClonSDZ0358, Eoin Ó Broin)
- 2. Joint submission from local representatives questions proposed naming of area of Cappagh and basis of potential confusion with Cappaghmore. (DraftClonSDZ0419, Cllr. Emer Higgins, Cllr. Vicki Casserly & Cllr. Kenneth Egan)
- 3. Submission outlines that local streets be named after Clondalkin people and/or in the Irish Language (<u>DraftClonSDZ0500</u>, <u>Declan Hanley</u>)
- 4. Requests that the Urban centre not be named Clonburris as it is in the Cappagh townland. (DraftClonSDZ0606, Sandra Scully)
- 5. The fourth key principle for Section 2.11, regarding the naming of new residential development, relates to historical and built heritage rather than natural heritage. (<u>DraftClonSDZ0300</u>, <u>Manager Dau</u>, <u>Dept. of Arts</u>, <u>Heritage and the Gaeltacht</u>)

Chief Executive's Response

Biodiversity and Natural Heritage

The Draft Planning Scheme has been prepared with the aim of achieving a balanced provision of a new high quality, urban residential environment while protecting, enhancing and sensitively upgrading the natural, built and cultural assets of the SDZ lands.

This approach was informed by the Strategic Environmental Assessment process and ecological surveys which were carried out in 2015, 2016 and 2017.

The Draft Planning Scheme requires that all development proposals should seek to enhance biodiversity and avoid or minimise loss of existing habitats and wildlife corridors. There are a number of measures set out in the Draft Planning Scheme that would minimise the impact on the natural heritage of the area. The Planning Scheme provides for a 50m set-back for all buildings from the northern side of the Grand Canal, to afford the optimal degree of protection to the Grand Canal ecological corridor.

Appropriate access to the northern towpath will have to be carefully designed based on site specific characterises and sensitivities (including lighting design, new planting of hawthorn and blackthorn species) and shall be set out in the Parks and Landscape Strategy (PLS). (See also Sections 2.10) Where new canal crossings i.e. footbridges/cycle bridges are proposed, they will be designed so as to avoid fragmentation of linear habitats associated with the Grand Canal Corridor.

The Draft Planning Scheme requires that all development proposals within 50m of the Grand Canal and feeder streams and 30m meters from the top of the bank of all watercourses (including the Griffeen River and the Kilmahudrick stream) shall be accompanied by an Ecological Impact Assessment. Given the biodiversity value of the SDZ lands, a Biodiversity Management Plan (BMP) is





required to be prepared by a qualified Ecologist and be guided by relevant best practice guidelines and established techniques for habitats present on the SDZ lands. The BMP shall form part of the Parks and Landscape Strategy. (See Section 2.10 Parks and Landscape Strategy).

The Draft Planning scheme also requires all external lighting will be down lit and should be time limited where possible.

The Department of Culture, Heritage and the Gaeltacht submission recommends that there should be on-going monitoring of the bat population, before, during and after construction by a bat specialist, so that good baseline data is gathered which can be compared to population data in the future and lighting modified as necessary. This is particularly important since bat friendly lighting was installed along the Grand Canal cycleway when it was initially constructed, but has not been adequately monitored. Consideration should be given to turning lighting off for certain periods during the night, as is currently being considered for the proposed Dodder Greenway. Ecological Surveys were carried out in 2015, 2016 and 2017 including bat surveys to inform the preparation of the Draft Planning Scheme; these will be included as an appendix of this report.

The Department of Culture, Heritage and the Gaeltacht submission also stated in their submission that there should be on-going monitoring of the otter population, before, during and after construction, by an otter specialist, so that good baseline data is gathered which can be compared to population data in the future and mitigation measures put in place as necessary. It is recommended that the area included in the otter surveys should include the entire section of the Grand Canal within the South Dublin County Council area, from Park West at Gallanstown beside the M50 to Hazelhatch, and also the entire course of the Griffeen River. The effectiveness as otter refuges of the artificial holts installed along the Grand Canal as part of the cycleway scheme, and the River Griffeen as part of the establishment of the Grange Castle Business Park, could then be assessed. Ecological Surveys were carried out in 2015, 2016 and 2017 including otter surveys to inform the preparation of the Draft Planning Scheme; these will be included as an appendix of this report.

The Department of Culture, Heritage and the Gaeltacht submission refers to the retention of hedgerows. There is in excess of 30 km of hedgerow/treeline habitat within the SDZ lands. The Draft Planning Scheme requires these to be retained where possible, the same species shall be planted along streets within the development.

The Department of Culture, Heritage and the Gaeltacht submission refers to the wording used on page 83 of the Draft Planning Scheme in relation to the set back of development from the Grand Canal pNHA boundary. It should be noted that the masterplan for the Planning Scheme was informed by the boundary of the pNHA, in the interests of completeness, it is recommended that the pNHA boundary be included in the references to the set back from the Grand Canal.

Place Names

One of the Key Principles of Section 2.11 Biodiversity and Natural Heritage states *To promote local heritage, the naming of any new residential development should reflect the local and historical context of its siting, and may include the use of the Irish language.*

In addition, the Draft Planning Scheme requires existing place names to be retained and their use promoted through the proposed development, particularly through the use of public art, and the marking of barony boundaries where appropriate.

In relation to the place names used in the Draft Planning Scheme, these generally reflect the geography and historic names of the area. In addition, the place names in the Draft Planning Scheme also reflect the names used in the Government SDZ Order and other policy documents. It is





considered that the Place Names in the Draft Planning Scheme are satisfactory and no changes are recommended.

Chief Executive's Recommendation

It is recommended that the following amendments be made to Sections, 2.10.3 and 2.11.2 (pgs. 85, 86, 87), of the Draft Planning Scheme

All buildings shall be set back 50m from the **Grand** Canal **pNHA** boundary and development (with the exception of footpaths and bridges) shall be set 30m from the Grand Canal **pNHA** boundary. Development proposals along the Grand Canal Corridor shall be accompanied by ecological impact assessments undertaken by an appropriately qualified and experienced ecologist and in line with CIEEM guidelines (2016)³.

The Planning Scheme provides for a 50m set-back for all buildings from the northern side of the Grand Canal pNHA boundary, to afford the optimal degree of protection to the Grand Canal ecological corridor.

Protected Species

In order to comply with European and National legislation on nature conservation, and to ensure that areas of biodiversity value are adequately protected, an EIA, prepared by a qualified Ecologist and in line with Guidelines for Ecological Impact Assessment in the UK and Ireland, Terrestrial, Freshwater and Coastal (CIEEM 2nd ed 2016) shall be required for development proposals that have the potential to impact on environmentally sensitive sites in particular within 50m of the Grand Canal pNHA boundary, and 30m of the Griffeen River and the Kilmahuddrick stream.

Strategic Environmental Assessment of Chief Executive's Recommendation

This is provided on foot of a submission by NPWS to ensure consistency in terms for the p NHA throughout the planning scheme and SEA ER. No interaction with SEOs.

Appropriate Assessment Screening of Chief Executive's Recommendation

No significant adverse impacts on European sites within the SDZ's zone of influence are predicted.





Section 2.12 Archaeological and Architectural Heritage

2.12.2 Architectural Heritage

- Conservation Society makes suggestions in relation to investigation and possible conservation of out-houses associated with Grange House (to north-west in particular) and reduction in building heights and densities in the area around Grange House. (DraftClonSDZ0415, Sinéad Ní Bháin, South Dublin Conservation Society)
- 2. Submission requests that the development should include a centrepiece project/ focal point created around the Canal and should be constructed to ensure the amenity is accessible by the community and creates a lasting feature casting the development in a positive light. (DraftClonSDZ0502, Ed O'Brien & John Curran TD, Fianna Fail Dublin Mid West)
- 3. Visual aspect of the Round Tower at the vantage point of the 11th Lock is excluded from the Draft Plan. Submission includes a petition (written and online) of 931 names to preserve the visual aspect of the Round Tower from 11th Lock. (<u>DraftClonSDZ0606</u>, <u>Sandra Scully</u>)
- 4. The Planning Scheme should include all protected structures in both the existing townlands of Cappagh and Clonburris Great. (DraftClonSDZ0514, The Tracey Family)
- 5. The visual impact of development at Clonburris on the Round Tower, Clondalkin is excluded in the Draft Planning Scheme. (<u>DraftClonSDZ0514</u>, <u>The Tracey Family</u>)

Chief Executive's Responses

Protected Structures

Further to concerns raised in relation to the inclusion of Protected Structures, the SDZ Planning Scheme provides for the conservation of all Protected Structures within the townlands of Cappagh that are within the SDZ boundary. It is advised that the townland of Clonburris Great is located outside the boundary of the SDZ lands and the conservation of structures within that townland is beyond the scope of the SDZ Planning Scheme. There are also no Protected Structures located in the townland of Clonburris Little.

Further to suggestions on out-houses in relation to Grange House, it is advised that Grange House including its curtilage was investigated as part of the preparation of the Archaeological and Architectural Heritage Inventory that accompanies the Draft Planning Scheme. The out buildings originally mapped and referenced in the inventory no longer exist.

The impact of development on Grange House will be assessed at planning application stage within the context of the overall development of the site.

Grand Canal and Round Tower

Further to the proposals for a centrepiece project around the Grand Canal and promoting accessibility, it is advised that the movement strategy devised as part of the Planning Scheme ensures that the Grand Canal is connected to a strategic network of pedestrian and cycle routes that permeates the Plan Lands and seeks to connect existing and future residents to this amenity. The Draft Planning Scheme also seeks the incorporation, refurbishments and re-use of Omer's Lock House (Protected Structure) as a cultural asset under Chapter 3 (Development Areas) and Section 2.10 (Landscape and Open Space of the Draft Planning Scheme. This provides scope for detailed cultural use proposals that can be assessed at planning application stage.

Further to concerns in relation to the impact of development on the Round Tower in Clondalkin, it is advised that the tower is located approximately 1.5 kilometres to the south-east of the 11th Lock and views of this structure from the SDZ lands are limited. Furthermore, the SDZ Draft Planning





Scheme sets back buildings by a minimum of 50 metres from the Grand Canal. The Draft Scheme also provides for reduced building heights and a reduced building footprint compared to the Clonburris SDZ Planning Scheme and Local Area Plan (2008) particularly in the Canal Extension Development Area. Development in this area will also be set back further from the Canal by an attenuation pond and a Grand Canal Park. On this basis, it is considered that the subject Draft Planning Scheme will not have a significant impact on proximate views of the Round Tower. It is also advised that it is the function of a County Development Plan to protect views and prospects and, within this context, the Round Tower in Clondalkin is not designated as a prospect under the South Dublin County Council Development Plan 2016 – 2022.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.

2.12.3 Archaeological Heritage

- 1. Submission from Clondalkin resident notes that the Planning Scheme has highlighted the archaeological potential of the SDZ Lands and suggests that finds should be incorporated similar to that demonstrated in Figure 2.12.7 to enhance the character of the area. (DraftClonSDZ0358, Eoin Ó Broin)
- 2. Conservation Society agrees with the conclusions of the Archaeological and Architectural Inventory and makes further suggestions in relation to delineating sub surface archaeology in parks and green spaces at surface level. (<u>DraftClonSDZ0415</u>, <u>Sinéad Ní Bháin</u>, <u>South Dublin</u> Conservation Society)
- 3. The Department of Culture, Heritage and the Gaeltacht submission states that given the nature of the likely development impacts and the archaeological potential of the SDZ lands, it is recommended that planning applications relating to developments within the SDZ are accompanied by archaeological impact assessments that involve a range of investigative field techniques including archaeological geophysical survey and archaeological test excavations.
 - (DraftClonSDZ0300, Manager Dau, Dept. of Arts, Heritage and the Gaeltacht)

Chief Executive's Responses

Further to the general suggestions in relation to the incorporation of archaeological heritage, it is advised that Section 2.12.3 of the Draft Planning Scheme favours the in-situ preservation of archaeological features and it is stated that any known or discovered features or sites should be sensitively incorporated where possible. It is also a requirement under Section 2.8.2 of the Draft Planning Scheme for all medium to large scale applications (>10 houses and/or 1,000 sq.m commercial) to be accompanied by a design statement that details the incorporation of archaeological sites or features. It is therefore considered that the SDZ Planning Scheme more than sufficiently addresses the suggestions in relation to the incorporation of known or newly discovered archaeology.

Further to the submission from the Department of Arts, Heritage and the Gaeltacht (DAHG), the requirements of the Draft SDZ are framed by the provisions of Framework and Principles for the Protection of Archaeological Heritage (DAHGI, 1999), which advise that archaeological assessment (including AIA and geophysical survey) is appropriate for development located within or in the vicinity of known or suspected archaeological sites or monuments and in the case of development of a scale and nature that makes it reasonable to consider its impact on unidentified archaeology. In accordance with the requirements of Planning and Development Legislation, AIA is normally incorporated within an Environmental Impact Assessment (EIA) and the thresholds for such are set out under Planning and Development Regulations (urban development greater that 2 hectares etc.).





Section 2.12.3 of the Draft Planning reflects and notes the high archaeological potential of the SDZ Lands together with the aforementioned DAHI publication. Within this context, it is a requirement for development to be accompanied by archaeological assessment in the form of desktop analysis and for this to include field survey work. It is further stated under the Draft Planning Scheme that developments shall be supported by a full Archaeological Impact Assessment (AIA) where it is predetermined to have the potential to disturb archaeology. It is also a requirement for the decision to carry out AIA (including Archaeological Testing) to be informed by advice from the DAHG. This also provides scope for detailed requirements such as geophysical survey to form part of any AIA.

The provisions of the SDZ Planning Scheme combined with the requirements of Planning and Development Legislation (in relation to EIA) therefore sufficiently addresses the suggestions of the DAHG and the requirements of the Framework and Principles for the Protection of Archaeological Heritage (DAHGI, 1999).

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.





Chapter 3.0 Character Areas and Development Areas

Development Area 1: Clonburris Urban Centre

- 1. There appears to be a lack of open space and green areas planned for Clonburris Town Centre, especially when compared to the Griffeen end. (<u>DraftClonSDZ0505</u>, <u>Paula Kelly</u>)
- Concern is expressed regarding the naming of Development Area 1: Clonburris Urban Centre, as the name has no historical connection to the existing townland of Cappagh. (<u>DraftClonSDZ0514</u>, The Tracey Family)

Chief Executive's Response

Clonburris Urban Centre provides for the level 3 District Centre and is adjacent to the railway station. In this context, the Centre is more urban in its design and layout. Open Space is provided in the form of an urban square to the scale of College Green, Dublin. It will provide an open urban space setting as a meeting place. The square will provide the central public space and the focus of public life and activities in Clonburris. It will also provide the focus for the social and economic life of Clonburris. In addition, the proposed Grand Canal Park is within 400m walking distance from the Urban Centre.

In addition, the Draft Planning Scheme provides blue and green spaces that will cover approximately 30% of the SDZ lands. These blue and green spaces will take the form of parks, open spaces, constructed wetlands, swales, tree planting, hedgerows, parks, permeable paving, green roofs and a green bridge over the railway line. These spaces will provide for amenity and recreation, biodiversity protection and enhancement, water management and adaption to climate change.

It is considered that the Draft Planning Scheme sufficiently provides for green space on the lands. The Draft Planning Scheme indicates that all residents will be within 400m of open space.

In relation to the name of Clonburris Urban Centre, established place names have been used as they are key elements of local context and wayfinding. The Draft Planning Scheme requires existing place names to be retained and their use promoted through the proposed development, particularly through the use of public art, and the marking of barony boundaries where appropriate.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.

Clonburris



Development Area 2: Clonburris South East

- Submission on behalf of Cappaghmore Residents' Association includes suggestion for development near the boundary with Cappaghmore including the retention of trees, setting back development and limiting building heights within 35 metres (of rear building lines) to no more than 2 storeys. The provision of vehicle and pedestrian activated traffic light controlled junction at the entrance/exit of Cappaghmore estate onto Ninth Lock Road is advocated and it is advised that all of the above suggestions were incorporated into the previous 2008 SDZ Planning Scheme. (<u>DraftClonSDZ0242</u>, <u>Deirdre Nolan</u>, <u>Cappaghmore</u> <u>Residents Group</u>)
- 2. Submission on behalf of SDZ landowner expresses concerns in relation to the development potential of the client's lands at Cappagh (east of Fonthill Road). Submission indicates that the central focus at the train station seems to predicate that a higher density portion of the SDZ be located to the east, with a consequential increase in the number of high rise apartments blocks, with no apparent regard to the form and context of the lands on the eastern side of the Fonthill Road and beyond which suffers from a higher proportion of low value lands and property. (DraftClonSDZ0344, Kelland Homes Ltd, Kelland Homes Ltd)
- 3. Submission on behalf of SDZ landowner expresses concerns in relation to the anticipated residential mix and density required in the Draft Scheme and the viability of the Scheme at the client's lands. Submitted that the mix and density will not generate enough economic impact to develop the lands for a high rise form of development. (DraftClonSDZ0344, Kelland Homes Ltd, Kelland Homes Ltd)
- 4. Submission on behalf of SDZ landowner outlines that the site can be developed with access from the Ninth Lock Road with no common infrastructure required. Submission expresses concerns in relation to the large proportion of common infrastructure including the provision of a school, public open space and lands for surface water attenuation on client's lands. (DraftClonSDZ0344, Kelland Homes Ltd, Kelland Homes Ltd)
- 5. Submission on behalf of SDZ landowner expresses concerns in relation to the proposed densities on the client's lands to the east of the Fonthill Road. Submitted that up to almost 80 units per hectare is unsustainable with the heights required and the need to appropriately interface with existing housing. (DraftClonSDZ0344, Kelland Homes Ltd, Kelland Homes Ltd)
- 6. Submission on behalf of SDZ landowner of lands to the east of the Fonthill Road proposes an alternative layout and proposal for their lands over 3 phases. Submission outlines that there is no need for high rise, high density development on these lands but a modification to the scheme could provide housing appropriate to the area. The submission describes the proposed alternative layout as high density, low rise housing, with lands reserved within the urban centre in the long term. Alternative proposal provides for a mix of dwellings, phasing that is realistic, appropriate interface with adjoin lands, delivery of SDZ principles and consideration of the locational context. (<u>DraftClonSDZ0344</u>, <u>Kelland Homes Ltd</u>, <u>Kelland Homes Ltd</u>)
- 7. Submission from Cappaghmore Estate Residents Association cautiously supports the development of Clonburris SDZ and their meeting raised a number of positive points in the SDZ in comparison to the 2008 SDZ. The submission requests the following:
 - Retain trees along boundary with Cappaghmore and buildings set back from trees to avoid interference
 - No development over 2 stories within the height restricted zone (refers to 2008 scheme zone) if it is any closer than 35m to the rear building lines of existing houses in the estate.
 - Provide traffic light controlled junction from estate to Ninth Lock Road (<u>DraftClonSDZ0499</u>, <u>Deirdre Nolan</u>)

Clonburris



- 8. Objects to any development over 3 storey adjacent to the existing estates of Cappaghmore and Ashwood to prevent overlooking. (DraftClonSDZ0498, Cllr Breeda Bonner)
- 9. Existing trees along boundaries of existing estates should be preserved to enhance privacy, in particular at Ashwood and Cappaghmore. (<u>DraftClonSDZ0498</u>, <u>Cllr Breeda Bonner</u>)
- Concern raised relation to the widening of the main road at Cappaghmore.
 (<u>DraftClonSDZ0504</u>, <u>South Dublin County PPN</u>, <u>South Dublin County Public Participation Network</u>)

Chief Executive's Response

The Draft Planning Scheme designates Clonburris South East as a high quality medium density residential neighbourhood. The area has a target of 201 units that will be 2 to 5 storeys in height. The key objectives for the area include integration with existing development at Cappaghmore, a range of housing along the new avenue and local streets including home zones and significant and integrated SUDS infrastructure, including a high amenity retention pond/lake within a new strategic open space at Cappaghmore.

The submission of the Cappaghmore Residents Association cautiously supports the development and notes the positive points of the Draft Planning Scheme compared to the 2008 Scheme.

Retention of trees

It is an objective of the Draft Planning Scheme to seek to retain hedgerows, aquatic habitats and established tree lines wherever possible.

Building height

In order to promote place making, urban legibility and visual diversity, varied building heights are proposed across the SDZ lands. Building heights have been designated under the Draft Planning Scheme to recognise the importance of place making and also to reflect other aspects of the Draft Scheme including density and urban structure requirements i.e. the primacy of Urban Centres, Link Streets and Arterial Streets.

In relation to buildings adjacent to existing two storey development, Section 2.8.6 of the Draft Scheme states that to ensure that building heights respect the surrounding context, new developments immediately adjoining existing one and two storey housing shall incorporate a gradual change in building height with no significant marked increase in close proximity to existing low-rise housing. In addition, the Draft Scheme states that a separation distance of 22 metres should generally be provided between directly opposing above ground floor windows to maintain privacy between residential schemes.

Vehicular and pedestrian controlled junction

The provision of a vehicular and pedestrian controlled junction at the entrance/exit of Cappaghmore estate onto Ninth Lock Road has been requested. A new traffic signalled junction will be provided where the link route from the SDZ lands joins onto the Ninth Lock Road, to the north of the Cappaghmore Estate. It is noted however that the Cappaghmore Estate is outside the boundary of the SDZ. In line with the Transport Assessment and Strategy, the Draft Planning Scheme proposes strategic junction upgrades including those on Lucan Newlands Road. Local junction upgrades will be subject to detailed design and this will be informed by further traffic assessments at planning application stage.

Clonburris



Density and residential mix

The range of dwellings permitted in the Draft Planning Scheme include houses, townhouses, duplex units, maisonettes and apartments. The Draft Planning Scheme requires dwelling mix in residential schemes to provide for a range of dwelling sizes to support a variety of household sizes.

Prescribed densities and building heights (see Section 2.8 Built Form and Design) will inform the appropriate dwelling typologies in each Development Area.

The densities prescribed in the Draft Planning Scheme are framed by the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), the Regional Planning Guidelines for the Greater Dublin Area 2004-2016 (RPGs, 2004) and the SDZ Order for Clonburris. This includes the promotion of higher densities particularly within walking distance of both railway stations located within the SDZ lands.

The prescribed densities in the Draft Planning Scheme also respond to the designation of Clonburris within a Metropolitan Consolidation Town under the RPGs, the positioning of the SDZ lands along a strategic public transport corridor and the designation of Clonburris as a Level 3 District Centre under the Retail Strategy for the Greater Dublin Area 2008 – 2016, in terms of ability to sustain residential development.

In the interest of flexibility, each of the density margins in the Sub sectors are based on a density target, which is then subject to a permissible margin of 10 dwellings per hectare (+5 dph, - 5dph). The lower end of each of the density margins represents the minimum densities permissible and the upper end of each of the density margins represents the maximum densities permissible in each Sub Sector. Residential densities shall be calculated on the basis of Net Development Area as set out in Section 2.1.4 (Extent of Development).

This Draft Planning Scheme was prepared to ensure that residential development is appropriately distributed across the SDZ lands in a manner that makes efficient use of transport infrastructure and services while integrating with employment, retail, community and education uses.

The minimum and maximum permissible number of residential units in Clonburris together with target dwelling numbers are set out in Table 2.1.5 of the Draft Planning Scheme.

The masterplan indicates important components such as routes, heritage, landscape, water management, urban blocks, key streets and space frontages. It is considered that any changes to the layout would have implications for all these components and as such, it is considered that alternative layouts are not justified in the absence of an evidence based approach.

Phasing

The phasing schedule is logical and flexible to ensure the coordinated and incremental development of the lands. Having regard to the vision of the Planning Scheme, the estimated population and the constraints of the lands, a phasing programme is required to ensure the coordinated planning and delivery of essential strategic infrastructure, amenities and community facilities in tandem with population growth.

Section 4.7 Operation of Phasing Programme in the Draft Planning Scheme provides for flexibility including a 'Roll Over' mechanism. A 'Roll - Over' mechanism may operate between any two phases. In the event of the maximum permissible number of units being completed before the required facilities and infrastructure in any phase, a 'Roll - Over' of up to 250 dwelling units may be constructed in the following phase, subject to planning permission. These residential units may not be constructed until the developer demonstrates the provision of requirements from the previous phase is ongoing and the units may not be occupied until the requirements in the previous phase have been completed.





In relation to viability, all measures and funding streams available for the release of funding to provide for the delivery of infrastructure and community facilities in Clonburris will be pursued in conjunction with landowners/ developers.

In carrying out its role as Development Agency, the Council will seek to coordinate with all relevant stakeholders, including Government Departments and agencies responsible for the provision of infrastructure to ensure coordinated delivery and funding.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.





Development Area 4: Clonburris North East

- 1. Submission on behalf of SDZ landowner expresses concerns in relation to the development potential of the client's lands at Cappagh (east of Fonthill Road). Submission indicates that the central focus at the train station seems to predicate that a higher density portion of the SDZ be located to the east, with a consequential increase in the number of high rise apartments blocks, with no apparent regard to the form and context of the lands on the eastern side of the Fonthill Road and beyond which suffers from a higher proportion of low value lands and property. (DraftClonSDZ0344, Kelland Homes Ltd, Kelland Homes Ltd)
- 2. Submission on behalf of SDZ landowner expresses concerns in relation to the anticipated residential mix and density required in the Draft Scheme and the viability of the Scheme at the client's lands. Submitted that the mix and density will not generate enough economic impact to develop the lands for a high rise form of development. (DraftClonSDZ0344, Kelland Homes Ltd, Kelland Homes Ltd)
- Submission on behalf of SDZ landowner outlines that the site can be developed with access from the Ninth Lock Road with no common infrastructure required. Submission expresses concerns in relation to the large proportion of common infrastructure including the provision of a school, public open space and lands for surface water attenuation on client's lands. (<u>DraftClonSDZ0344</u>, <u>Kelland Homes Ltd</u>, <u>Kelland Homes Ltd</u>)
- 4. Submission on behalf of SDZ landowner expresses concerns in relation to the proposed densities on the client's lands to the east of the Fonthill Road. Submitted that up to almost 80 units per hectare is unsustainable with the heights required and the need to appropriately interface with existing housing. (<u>DraftClonSDZ0344</u>, <u>Kelland Homes Ltd</u>, <u>Kelland Homes Ltd</u>)
- 5. Submission on behalf of SDZ landowner of lands to the east of the Fonthill Road outlining that the open space and school site should be relocated to areas necessary to have higher density and use the current sites for housing. (DraftClonSDZ0344, Kelland Homes Ltd, Kelland Homes Ltd)
- 6. Submission on behalf of SDZ landowner of lands to the east of the Fonthill Road proposes an alternative layout and proposal for their lands over 3 phases. Submission outlines that there is no need for high rise, high density development on these lands but a modification to the scheme could provide housing appropriate to the area. The submission describes the proposed alternative layout as high density, low rise housing, with lands reserved within the urban centre in the long term. Alternative proposal provides for a mix of dwellings, phasing that is realistic, appropriate interface with adjoin lands, delivery of SDZ principles and consideration of the locational context. (DraftClonSDZ0344, Kelland Homes Ltd, Kelland Homes Ltd,

Chief Executive's Response

The Draft Planning Scheme designates Kishoge North East as a high quality, medium density, residential area, close to Clonburris Urban Centre. The area has a target of 410 residential units, 2 to 5 storeys in height. A new post primary school will be provided adjacent to a new focal space/local park. It is a key objective to prioritise pedestrian and cyclist movement and to provide for local bus services along the avenue and to provide for a range of housing along the new Link Street/avenue and including the local streets and home zones.

Density & Dwelling Mix

The range of dwellings permitted in the Draft Planning Scheme include houses, townhouses, duplex units, maisonettes and apartments. The overall dwelling mix in residential schemes should seek to provide for a range of dwelling sizes to support a variety of household sizes.





Prescribed densities and building heights (see Section 2.8 Built Form and Design) will inform the appropriate dwelling typologies in each Development Area.

The densities prescribed are framed by the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), the Regional Planning Guidelines for the Greater Dublin Area 2004-2016 (RPGs, 2004) and the SDZ Order for Clonburris. This includes the promotion of higher densities particularly within walking distance of both railway stations located within the SDZ lands.

The prescribed densities in the Draft Planning Scheme respond to the designation of Clonburris within a Metropolitan Consolidation Town under the RPGs, the positioning of the SDZ lands along a strategic public transport corridor and the designation of Clonburris as a Level 3 District Centre under the Retail Strategy for the Greater Dublin Area 2008 – 2016, in terms of ability to sustain residential development.

In addition, to allow for more accurate management of densities and ensure that higher densities are achieved in appropriate areas, densities in the Draft Planning Scheme are prescribed according to Sub Sector (as Development Areas are divided into Sub Sectors - refer back to Figure 2.1.4). Development within each Sub Sector shall be consistent with the density margins set out in Table 2.1.8. In the interest of flexibility, each of the density margins are based on a density target, which is then subject to a permissible margin of 10 dwellings per hectare (+5 dph, - 5dph). The lower end of each of the density margins represents the minimum densities permissible and the upper end of each of the density margins represents the maximum densities permissible in each Sub Sector. Residential densities shall be calculated on the basis of Net Development Area as described under Section 2.1.4 (Extent of Development).

This Draft Planning Scheme was prepared to ensure that residential development is appropriately distributed across the SDZ lands in a manner that makes efficient use of transport infrastructure and services while integrating with employment, retail, community and education uses.

The masterplan indicates important components such as routes, heritage, landscape, water management, urban blocks, key streets and space frontages. It is considered that any changes to the layout would have implications for all these components and as such, it is considered that alternative layouts are not justified in the absence of an evidence based approach.

Phasing

The phasing schedule is logical and flexible to ensure the coordinated and incremental development of the lands. Having regard to the vision of the Planning Scheme, the estimated population and the constraints of the lands, a phasing programme is required to ensure the coordinated planning and delivery of essential strategic infrastructure, amenities and community facilities in tandem with population growth.

The Draft Planning Scheme does provide for flexibility including a 'Roll Over' mechanism. A 'Roll - Over' mechanism may operate between any two phases. In the event of the maximum permissible number of units being completed before the required facilities and infrastructure in any phase, a 'Roll - Over' of up to 250 dwelling units may be constructed in the following phase, subject to planning permission. These residential units may not be constructed until the developer demonstrates the provision of requirements from the previous phase is ongoing and the units may not be occupied until the requirements in the previous phase have been completed.

Clonburris



In relation to viability, all measures and funding streams available for the release of funding to provide for the delivery of infrastructure and community facilities in Clonburris will be pursued in conjunction with landowners/ developers.

Alternative Layout

The masterplanning of the Draft Planning Scheme was an iterative process involving a multidisciplinary team of experts using best practice approaches and concepts.

A range of professions were involved including key stakeholders, such as Irish Water, National Transport Authority, Eirgrid, SEAI and the Department of Education and Skills, and the inputs of key professions from SDCC and external consultations into the AA, SEA, SFRA, SWS, Energy Masterplan, Retail Study, Employment Floorspace Demand Study and the Transport Assessment and Strategy processes.

As such, the Draft Planning Scheme is a robust comprehensive framework and within the context of the above, alternative layouts are not justified in the absence of an evidence based approach.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.





Development Area 7: Kishoge North West

- 1. Opposition is raised to open pedestrian walkways into existing housing estates. This would erode the security of the Oldbridge estate and take away a sense of safety for children playing on the only greenspace in the estate. Homeowners purchased houses in the estate due to the cul-de-sac and do not want that to change. (DraftClonSDZ0029, Alan Johnson)
- Submission from resident of Tullyhall Rise expressing objection to the proposed permeability connection into the estate. Submission outlines that land in front of the route at no.13 is not public land. Submission states that there are no footpaths in Tullyhall Rise and the street is not safe for additional volume of pedestrians. (<u>DraftClonSDZ0043</u>, <u>Jeanine Nolan</u>)
- 3. Objection from Lucan Resident in relation to opening of the Cul De Sac on Oldbridge Court as part of the development of Kishoge North by reason of traffic congestion, additional pedestrian activity, anti-social behaviour, impact on residential amenity and absence of benefit for existing residents. It is suggested that the development of the Kishoge North should be subject to a condition that the boundary wall for Oldbridge especially Oldbridge Court is maintained. (DraftClonSDZ0179, Fintan McConnell)
- 4. The northernmost urban block containing the proposed new school should be amended to include only the school with the remainder to be public parkland to include playing pitches for use by the three nearby existing schools: Lucan East Educate Together NS, Griffeen Valley Educate Together NS and Kishoge Community College. (<u>DraftClonSDZ0204</u>, William Lavelle)
- 5. The proposed new square incorporating existing open space between Rossberry/Oldbridge estates and the new northwest corner of Development Area 7 Kishoge North West should be omitted and the boundary to the existing open space between Rossberry/Oldbridge estates should be retained. (DraftClonSDZ0204, William Lavelle)
- 6. A pedestrian/cycle 'green route' should be provided to link the local centre at Griffeen Avenue to Kishoge Community College. (<u>DraftClonSDZ0204</u>, <u>William Lavelle</u>)
- 7. The proposed 3-5 storey building heights that would overlook existing 2 storey houses in Oldbridge would in turn causing overshadowing and loss of privacy. (DraftClonSDZ0334, Gerard Griffin)
- 8. Opening up cul-de-sacs in Oldbridge estate off Griffeen Avenue for additional housing will be a disaster in traffic management terms. It will also add a dangerous level of cars on the road given the location of existing primary schools, Griffeen Valley and Lucan East Educate Together, which are located in very close proximity.
 The existing zebra crossing on Griffeen Avenue is dangerous as rushed commuters do not obey the rules of the road and stop for pedestrians crossing the road. (<u>DraftClonSDZ0187</u>, Stephen Scallan)
- 9. The structure of the Oldbridge estate should be left as it is, any additional houses will destroy the quality of life of existing residents. (<u>DraftClonSDZ0187, Stephen Scallan</u>)
- 10. Strong objection to plans for high rise buildings to the rear of Oldbridge due to overlooking concerns. (<u>DraftClonSDZ0304</u>, <u>PAULINE KEOGH</u>)
- 11. The submission strongly objects to plans for high rise buildings due to overlooking concerns. The submission also strongly objects to the opening up the boundary walls/cul de sacs within Oldbridge estate for pedestrian excess. It is noted that there are no footpaths within Oldbridge and this makes it very difficult for pedestrians and car to navigate through the estate. Increasing any footfall from this new development through the estate will lead to accidents. (DraftClonSDZ0304, PAULINE KEOGH)
- 12. Proposed residential development should be removed from the northern part of the lands between Lucan East and Kishoge to allow for a community campus of sports facilities and open space. These lands could be used by all schools nearby including the new designated site, existing Lucan and new Clonburris residents. Any loss of housing at this location can be





made up by an increase in density closer to the Kishoge railway station. (<u>DraftClonSDZ0332</u>, Paul Gogarty)

- 13. The entrance to Griffeen Valley East Educate together should be changed to open onto the Adamstown Road as was proposed by residents at the time of its building.

 (DraftClonSDZ0434, Nathaniel Doyle)
- 14. The proposed school at Griffeen will add to the existing traffic congestion and will have major traffic implications. (<u>DraftClonSDZ0434</u>, <u>Nathaniel Doyle</u>)

Chief Executive's Response

The Draft Planning Scheme designates Kishoge North West as a high quality medium density residential neighbourhood. The area has a target of 566 units that will be 2 to 5 storeys in height. The lands will also accommodate an existing primary school and a proposed post primary school. The key objectives for the area include strong links with the existing community at Griffeen and to reinforce the existing local node at Griffeen with new open space and education facilities.

Permeability improvements

The pedestrian and cycle network is designed to improve activity while improving passive surveillance in streets and spaces in accordance with the principles of urban design. This should help discourage anti-social behaviour. Further to a submission, the creation of underpasses that do not benefit from passive surveillance are not recommended.

Research (Permeability Best Practice Guide, 2013) has shown that local permeability improvements for existing areas such as those indicated on Figure 2.2.2 and 2.2.3 of the Draft Planning Scheme can reduce walking and cycling distances to schools, shops, public transport and other community facilities by delivering new links and opening barriers to movement. These can have many local economic, public transport, health and community development benefits. Within the context of submissions received that object to proposed local pedestrian, vehicular and cyclist links/bridges with existing communities (Tullyhall, Old bridge) the Draft Planning Scheme seeks to provide both existing and new communities with direct or indirect access to existing and planned facilities and infrastructure within the SDZ lands via the planned pedestrian and cyclist route network. It should be noted that only one of the links is proposed for vehicles (Ashwood) while the remaining links are proposed for pedestrians and cyclists only. The proposed bridge that will connect with lands on the southern side of the Grand Canal near Kilcronan is also proposed for pedestrians and cyclists only.

It should be noted that the proposed local and pedestrian links with existing communities are indicative only and, in accordance with the recommendations of the Permeability Best Practice Guide (2013), should be subject to further assessment and approval (planning application or Part 8 approval) including further public consultation.

Playing pitches

A requirement of the Draft Planning Scheme is that a Parks and Landscape Strategy (PLS) shall be prepared by all the developers, for the entire SDZ lands and shall be submitted to and agreed in writing with SDCC prior to the commencement of development on the lands. The PLS shall be prepared by a suitably qualified Landscape Architect in conjunction with a suitably qualified Ecologist.

The PLS shall include overarching design details for the strategic open spaces, local parks and squares, urban spaces and squares, strategic routes and local links and also details of active and passive recreation provision on the lands. As such the details of the playing pitches will be set out in the PLS.

Clonburris



Building height

A number of issues were raised in relation to the impact of the proposed building height (2-5 storeys) on the existing adjacent communities.

In order to promote place making, urban legibility and visual diversity, varied building heights are proposed across the SDZ lands. Building heights have been designated under the Draft Planning Scheme to recognise the importance of place making and also to reflect other aspects of the Draft Scheme including density and urban structure requirements i.e. the primacy of Urban Centres, Link Streets and Arterial Streets.

In relation to buildings adjacent to existing two storey development, Section 2.8.6 of the Draft Scheme states that to ensure that building heights respect the surrounding context, new developments immediately adjoining existing one and two storey housing shall incorporate a gradual change in building height with no significant marked increase in close proximity to existing low-rise housing.

In addition, the Draft Scheme states that a separation distance of 22 metres should generally be provided between directly opposing above ground floor windows to maintain privacy between residential schemes.

Proposed Schools and traffic congestion

One of the key principles of the Movement and Transport Section of the Draft Planning Scheme is to develop a transport framework that maximises route choice and access to residential, education, retail, service, community and leisure uses by means of walking, cycling and public transport while balancing the needs of the car.

The Draft Planning Scheme also seeks to ensure that all residential development will also be afforded direct or indirect access to dedicated pedestrian and cyclist routes to schools and local facilities especially parks, open spaces, public transport, retail and non-retail services. A key outcome of the Draft Planning Scheme is that 72% of all residents will be within 500m of a school. As such, it is considered that there will be sufficient choice of modes of transport in order to mitigate against traffic congestion.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.





Development Area 8: Kishoge South West

- Additional parkland should be provided to include marked-up playing pitches. (<u>DraftClonSDZ0204</u>, <u>William Lavelle</u>)
- Submission from CTDG outlines concerns in relation to the density and height of development on the existing Traveller accommodation and overlooking of same. (<u>DraftClonSDZ0512</u>, Stephen Browne, Clondalkin Travellers Development Group)
- 3. The owners of lands in Kishoge SW are fully committed to working with SDCC and other parties to ensure the best planning use of these lands which they believe will play a significant role in the realisation of the proper planning and sustainable development of the area. (DraftClonSDZ0508, The Heapes Family, The Heapes Family)
- 4. The draft plan has identified a green belt corridor that would run north from the Grand Canal. It is submitted the provision of this corridor, in this location, is unnecessary, particularly given that Griffeen Valley Park, which provides the bulk of green space within the entire SDZ, is located a few hundred metres away.
 In addition, a significant pedestrian walkway is planned along the Grand Canal corridor, adjacent to KSW (S2 and S4). In view of the location of both the Griffeen Valley Park and the Grand Canal pedestrian corridor, it is submitted that the green belt area is excessive for this medium density development area and consideration should be given to removal of same.
 (DraftClonSDZ0508, The Heapes Family, The Heapes Family)
- 5. The physical context of the subject lands with extensive canal side frontage presents a clear opportunity to establish a sustainable residential density level as emphasised by the following
 - Canal side frontage provides for minimal overlooking of residential properties;
 - The full extent of the landholding is located within 10minute walking distance of Kishoge;
 - Passive surveillance of the Canal will be achieved by residential/commercial development addressing the canal; and
 - South facing aspect of the landholding provides an opportunity to increase the level of development in this area.

(DraftClonSDZ0508, The Heapes Family, The Heapes Family)

Chief Executive's Response

The Draft Planning Scheme designates Kishoge South West as a high quality low to medium density residential neighbourhood. Community space, retail and non retail commercial development will be provided and will capitalise on the extension of the Griffeen valley Park. The area has a target of 1059 units that will be 2 to 5 storeys in height. The key objectives for the area include integrating with existing housing, developing a new local node, Grange, and to prioritise pedestrian and cyclist movement and to provide for local bus services along the avenue.

Playing pitches

A requirement of the Draft Planning Scheme is that a Parks and Landscape Strategy (PLS) shall be prepared by all the developers, for the entire SDZ lands and shall be submitted to and agreed in writing with SDCC prior to the commencement of development on the lands. The PLS shall be prepared by a suitably qualified Landscape Architect in conjunction with a suitably qualified Ecologist. The PLS shall include overarching design details for the strategic open spaces, local parks and squares, urban spaces and squares, strategic routes and local links and also details of active and passive recreation provision on the lands. As such, the details of the playing pitches will be set out in the PLS.





Traveller Accommodation

Development surrounding existing Traveller Accommodation will be subject to assessment of compliance with design criteria set out in Section 2.8 of the Draft Planning Scheme. This will include building setback and heights, privacy and overlooking, sunlight and daylight at planning application stage.

Green Infrastructure Network

The SDZ lands benefit from rich and varied natural heritage features, habitats and landscapes, all of which are important in defining the character of Clonburris and in providing amenities for future residents.

The Draft Planning Scheme was prepared with the positive aspects of the character and heritage of SDZ lands in mind and the landscape and historic boundaries of the lands have played a significant role in the shaping of the lands. They provide the linear corridors, such as the Canal, and the strategic open spaces, such Griffeen Valley Park and the Barony Park (North and South), which are essential in defining the main places and sectors of Clonburris.

There are many benefits to protecting these including amenity and recreation, biodiversity protection, flood management and adaptation to climate change.

It is not possible to retain all habitats within the SDZ lands, however, wherever possible, habitats have been retained within the Draft Planning Scheme in the form of natural green space around the Canal and Griffeen River, Kilmahuddrick stream, public open space and retained hedgerows/treelines.

Canal Frontage

The Grand Canal is integrated within the urban structure of Clonburris and new bridges will provide important connections across them. In addition, one of the key objectives for this area is to provide a distinctive, diverse and quality frontage to the Canal corridor. The physical context of the subject lands with extensive canal side frontage presents a clear opportunity to establish a sustainable residential community in this location.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.





Development Area 10: Kishoge North East

- Submission objects to the opening of cul de sacs at Foxborough. Outlines that the increased volume of vehicular and pedestrian traffic would impact on quality of life. (DraftClonSDZ0001, Richard Dillon)
- Submission outlines concerns in relation to the density and max height backing on to
 Foxborough at Kishoge North East. A max in excess of 800 dwellings and a max height of 5
 stories would have a massive impact by overlooking the existing 2 storey dwellings.
 (DraftClonSDZ0001, Richard Dillon)
- 3. Opposition of the proposed pedestrian access to the SDZ lands via Foxborough Court and Foxborough Road for the following reasons:
 - 1) Parking in Foxborough is difficult at present due to school runs and possible overflow parking from the SDZ lands itself.
 - 2) Antisocial behaviour as the proposed access will make it easier for criminal activity and for offences to escape undetected.
 - 3) The green area at Foxborough Road is an excellent facility and safe environment for young children to play. Opening this green area at Clonburris would pose a direct risk to the children of the area. (DraftClonSDZ0021, Alan Duffy)
- 4. Opening access to Foxborough from the Clonburris SDZ will result in excess traffic through a residential estate, which already has heavy traffic flow. Opening up these areas will only exacerbate already serious anti-social behaviour problems in the area. (<u>DraftClonSDZ0022</u>, Jennifer Duffy)
- 5. Opposition is raised to the proposed opening of cul-de-sacs at Foxborough to facilitate access to Kishogue. This will be dangerous for children and will increase anti-social behaviour in the estate. (DraftClonSDZ0025, Alison Gahan)
- Opposition is raised to opening up cul-de-sacs in the Foxborough estate. The area is already suffering from cars being parked during the day. Opening up the cul-de-sacs will make it harder for emergency services, refuse collectors, and service men to access properties. (<u>DraftClonSDZ0030</u>, <u>Gary Jones</u>)
- 7. Opposition is raised for high rise development (five storey houses) overlooking the Foxborough area, right to privacy should be respected. (DraftClonSDZ0030, Gary Jones)
- 8. Concern raised in relation to the impact of opening of cul-de-sacs from Kishoge North East and Foxborough Housing Estate in particular in relation to using the street for car parking and the safety of cyclists using the openings. (DraftClonSDZ0039, valerie ennis

 DraftClonSDZ0040, Foxborough Residents Group Lucan, Foxborough Residents Group)
- 9. Concern raised in relation to the impact of opening of cul-de-sacs from Kishoge North East and Foxborough Housing Estate on the residents in the area considering it will only shorten residents journey by 2mins. (DraftClonSDZ0039, valerie ennis)
- 10. Concern raised in relation to the impact of opening of cul-de-sacs from Kishoge North East and Foxborough Housing Estate on the safety of children playing of the street considering how many people will have direct access to their street and the planned water feature in KNE brings extra safety concerns. (<u>DraftClonSDZ0039</u>, valerie ennis)
- 11. Concern is raised in relation to the building height of proposed houses in Kishoge North West and Kishoge North East in proximity to Foxborough, Rossberry, Oldbridge and Tullyhall residential estates which it is considered will result in loss of privacy, compromised security and development that is not in keeping with the character of the area. (DraftClonSDZ0040, Foxborough Residents Group Lucan, Foxborough Residents Group)
- 12. Submission from a resident of Foxborough objecting to the proposal to open up the cul de sac for the following reasons:
 - (a) Opening up the bordering wall between Kishoge and Foxborough, will compromise the safety of the children playing.





- (b) Increased Crime: There has been a significant rise in crime in the area over the last few years. All of which have happened with restricted routes of escape. Opening up the border wall to Foxborough will only provide several additional escape routes therefore increasing crime.
- (c) Parking: With reduced parking being proposed and opening up the boundary wall with Foxborough, submitter fears people will use Foxborough Court and surrounding areas to park additional cars and walk through the pedestrian access point back to their home. And people may also use it to park when dropping or collecting their children from Colaiste Kishogue. Parking in Foxborough Court is already at a premium.

 (DraftClonSDZ0169, Deirdre Niland)
- 13. Submission objects to the number of units being quoted and also the height of the buildings. Submitter is a resident of Foxborough and does not want to be overlooked by units taller than existing. Foxborough and surrounding areas are heavily populated as it is, adding a minimum of 666 units will only have a negative impact on the community. Services, transport and infrastructure in the area are at breaking point as it is, and adding 666 + housing units will not help to alleviate an already overloaded area. (DraftClonSDZ0169, Deirdre Niland)
- 14. Submission objects to the height of buildings directly behind their house (Address given as Foxborough Way). Submission outlines that they do not wish to be directly over-looked by tall/large scale apartment buildings.
 Submission raises concerns in relation to the proposed opening of the cul-de-sac (at Foxborough) for increased "permeability". Submitter does not believe this will greatly benefit new residents in any way but will negatively impact existing residents due to increased litter, reduced security and potential safety issues. Additionally, submission does not want security compromised by increased traffic (pedestrian, cycle or otherwise) on the road. The road already has congestion issues due to the number of cars parked there. (DraftClonSDZ0166, Andrew Mowatt)
- 15. The opening up of existing cul de sac's at Foxborough will create an increased volume of both vehicle and pedestrian traffic through a quiet and secure cul de sac. In addition, it will have implications for safety and antisocial behaviour. (DraftClonSDZ0302, Sinead Dillon)
- 16. The proposed density of Kishoge North East will impact the existing properties in Foxborough by way of overlooking. (<u>DraftClonSDZ0302, Sinead Dillon</u>)
- 17. The opening of access points through cul de sacs in Foxborough will have a negative impact on existing residents by virtue of traffic generation, noise, litter and antisocial behaviour. (DraftClonSDZ0154, Liah Caffiere)
- 18. Submission outlines that the planning for houses behind the Foxborough estate are too high to fit into the area and would allow people to directly look into our garden.

 (DraftClonSDZ0405, Roisin Healy)
- 19. Submission outlines objection to the opening of cul de sacs in Foxborough estate. Opening the cul de sac would devalue our house and our quality of living, especially as the main road is already opening to the big crossing, why would there be a need for another opening two streets down when this would influence the life of all the families with children in our street that at the moment are safe to play. (DraftClonSDZ0405, Roisin Healy)
- 20. Submission objects to the plan to put 6 storey blocks between Kishoge and properties in Foxborough and to open road access through there. (<u>DraftClonSDZ0402, Anna O'Neill</u>)
- 21. Opening of cul-de-sacs at the Foxborough estate will facilitate anti-social behaviour and a rat run for traffic. (<u>DraftClonSDZ0291</u>, <u>Mark Coade</u>)
- 22. The lands referred to in the submission are located to the west of the strategic green corridor are medium density and lands to the east are medium to high density closer to the town centre. The proposed densities are generally acceptable (DraftClonSDZ0335, Dietacaron)





23. Submission from Clondalkin Traveller Developments Group outlines concerns in relation to the density and height of development on the existing Traveller accommodation and overlooking of same. (<u>DraftClonSDZ0512</u>, <u>Stephen Browne</u>, <u>Clondalkin Travellers</u> <u>Development Group</u>)

Chief Executive's Response

The Draft Planning Scheme designates Kishoge North East as a high quality residential neighbourhood at Kishoge, integrating with existing housing. The area has a target of 738 units that will be 2-5 storeys is height. The key objectives include provision of locally accessible open spaces of local and strategic importance, prioritise pedestrian and cyclist movement and to provide for local bus services along the avenue and provision of significant and integrated SUDS infrastructure, including a high amenity retention pond/lake to enhance green and blue infrastructure and ecological connectivity.

Permeability

The pedestrian and cycle network is designed to improve activity and benefit from while improving passive surveillance in streets and spaces in accordance with the principles of urban design. This should help discourage anti-social behaviour. Further to a submission, the creation of underpasses that do not benefit from passive surveillance are not recommended.

Research (Permeability Best Practice Guide, 2013) has shown that local permeability improvements for existing areas such as those indicated on Figure 2.2.2 and 2.2.3 of the Draft Planning Scheme can reduce walking and cycling distances to schools, shops, public transport and other community facilities by delivering new links and opening barriers to movement. These can have many local economic, public transport, health and community development benefits. Within the context of submissions received that object to proposed local pedestrian, vehicular and cyclist links/bridges with existing communities (Foxborough), the Draft Planning Scheme seeks to provide both existing and new communities with direct or indirect access to existing and planned facilities and infrastructure within the SDZ lands via the planned pedestrian and cyclist route network. It should be noted that only one of the links is proposed for vehicles (Ashwood) while the remaining links are proposed for pedestrians and cyclists only. The proposed bridge that will connect with lands on the southern side of the Grand Canal near Kilcronan is also proposed for pedestrians and cyclists only.

It should be noted that the proposed local and pedestrian links with existing communities are indicative only and, in accordance with the recommendations of the Permeability Best Practice Guide (2013), should be subject to further assessment and approval (planning application or Part 8 approval) including further public consultation.

Traveller Accommodation

Development surrounding existing Traveller Accommodation will be subject to assessment of compliance with design criteria at planning application stage. This criteria is set out in the Planning Scheme, in particular building setback and heights, privacy and overlooking, sunlight and daylight.

Building height

In order to promote place making, urban legibility and visual diversity, varied building heights are proposed across the SDZ lands. Building heights have been designated under the Draft Planning Scheme to recognise the importance of place making and also to reflect other aspects of the Draft Scheme including density and urban structure requirements i.e. the primacy of Urban Centres, Link Streets and Arterial Streets.





In relation to buildings adjacent to existing two storey development, Section 2.8.6 of the Draft Scheme states that to ensure that building heights respect the surrounding context, new developments immediately adjoining existing one and two storey housing shall incorporate a gradual change in building height with no significant marked increase in close proximity to existing low-rise housing.

In addition, the Draft Scheme states that a separation distance of 22 metres should generally be provided between directly opposing above ground floor windows to maintain privacy between residential schemes.

Density

It is noted that one submission stated that the densities were sufficient for the Development Area. In addition, concern raised in relation to an additional 666 (min) houses. The densities prescribed in the Draft Planning Scheme are framed by the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), the Regional Planning Guidelines for the Greater Dublin Area 2004-2016 (RPGs, 2004) and the SDZ Order for Clonburris. This includes the promotion of higher densities particularly within walking distance of both railway stations located within the SDZ lands.

The prescribed densities in the Draft Planning Scheme also respond to the designation of Clonburris within a Metropolitan Consolidation Town under the RPGs, the positioning of the SDZ lands along a strategic public transport corridor and the designation of Clonburris as a Level 3 District Centre under the Retail Strategy for the Greater Dublin Area 2008 – 2016, in terms of ability to sustain residential development.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.





Development Area 11: Adamstown Extension

- Submission suggests amending the Adamstown Extension area of the Plan and not provide development on the existing Pitch & Putt Club. The plan will contravene your own objective of providing sports/leisure facilities & remove a Club which is one of the largest in Ireland. (DraftClonSDZ0165, Peter Keogh)
- 2. Submission advises that the Ahmadiyya Muslim association of Ireland purchased the Fosset's site prior to the SDZ Planning Scheme to secure a place for community worship, education and activities. It is submitted that the SDZ creates and opportunity to create a sustainable and inclusive community including the provision of versatile, multi-functional community buildings such as that proposed by the Ahmadiyya community. Facilitating the proposed use of the site or a land swap that ensures consistency with the Planning Scheme is supported. (DraftClonSDZ0241, Sarah Holland)
- 3. Submission from President and Directors of the Ahmadiyya Muslim Community advises that the Fossett Circus site was purchased for a Mosque / Community Facility on the basis that it was already developed (brownfield) and that costly site clearance was carried out at the behest of South Dublin County Council. Concern is raised in relation to failure to take a predraft submission into consideration, inappropriate decision making and failure to consider the community's needs, requests and investment. Reference is also made to pre-planning consultation. It is submitted that the subject site has no amenity value, is of limited shape/dimensions, privately owned, not accessible to the public and would be difficult form part of any meaningful amenity space. It is suggested that there is an imbalance in the SDZ Planning Scheme with regard to the distribution of open space (over reliance on western end) and requested that the subject site be included within the development area that fronts the Newcastle Road with Hayden's Lane forming the development boundary. It is also requested that community/civic/ religious uses be made possible on the site by way of a special objective. (DraftClonSDZ0250, M Anwar Malik, Ahmadiyya Muslim Association DraftClonSDZ0340, Shahid Ahmed, Ahmadiyya Muslim Association Ireland DraftClonSDZ0252, Dr Mashood Ahmed, Ahmadiyya Muslim Association Ireland DraftClonSDZ0253, mansoor malik DraftClonSDZ0256, Fazal Ur Rehman Butt, Ahmadiyya Muslim Association Ireland)
- 4. Part of the proposed housing is located on the Griffeen River floodplain which flooded in 2000.
 - Additional parkland should be provided to include marked-up playing pitches including as required by Development Plan objective C12 SLO 1: To require the provision of public open space, including at least one full size playing pitch, prior to the occupation of any development permitted on these lands located east of the R120 Newcastle Road, north of the Grand Canal and west of Hayden's Lane.

 (DraftClonSDZ0204, William Lavelle)
- 5. Submission from Lucan resident requests that provision be made for community facilities and a place of worship (by reason of the absence of such facilities) at the 12th Lock, Grange, Hayden Lane, Adamstown, Lucan, County Dublin. (<u>DraftClonSDZ0320, najiya kiran</u>)
- 6. Submission on behalf of Ahmadiyya Muslim Association Ireland outlining that their lands at Hayden's Lane have been designated as open space in the draft SDZ and under this designation the lands have no development potential for development of a mosque and community centre for their community. Submission expresses objection and outlines the following site specific observations:
 - -Submission on behalf of Ahmadiyya Muslim Association Ireland outlining that the existing site is a brownfield site and has no amenity value at present, is privately owned and is not accessible to the public. It is difficult to see how the lands would add to or form part of any meaningful and useful amenity space in its current condition.





-Submission on behalf of Ahmadiyya Muslim Association Ireland arguing that this portion of lands (at Hayden's Lane) should be included within the proposed development zone fronting on to the Newcastle Road and that the boundary for this development zone should be Hayden's Lane to the east rather than the Griffeen stream. The presence of inhabited private dwellings in separate ownership to the south east of our client's lands would further diminish the potential of the lands to contribute meaningfully to public open space.

- -Submission on behalf of Ahmadiyya Muslim Association Ireland outlining that the use of the site at Hayden's Lane for a community / civic / religious use would not preclude the site having some valuable amenity value. An appropriate development set-back from the Griffeen Stream and the maintenance of the existing hedgerow planting would have the potential to act as ecological and amenity corridor linking into the existing canal corridor which it is proposed to maintain and enhance as part of the SDZ. (DraftClonSDZ0342, Muhammad Anwar Malik, Ahmadiyya Muslim Association)
- 7. Submission on behalf of Ahmadiyya Muslim Association Ireland outlining that the development of a community / civic / religious use on the site could be made possible in a number of ways: by including the site as part of the general development area or by means of a special objective in the SDZ plan. In either instance an appropriate quantum of development could be agreed for the site which would allow the maintenance of existing natural features, maintain existing residential amenity and provide an appropriate visual setting for any proposed development. (DraftClonSDZ0342, Muhammad Anwar Malik, Ahmadiyya Muslim Association)
- 8. Submission on behalf of Ahmadiyya Muslim Association Ireland requests that some provision whether by means of zoning, special objective or otherwise is made in the SDZ plan to facilitate or provide lands for our client's proposed development. (DraftClonSDZ0342, Muhammad Anwar Malik, Ahmadiyya Muslim Association)
- Submission outlines that the plan does not have sufficient provision for business park light industry. Submission outlines that the plan should include multi-sport all weather facilities. Both the business Park and all weather facility could be located opposite Lucan Sarsfields between the two existing business parks, at the area referred to as Adamstown Extension (<u>DraftClonSDZ0409</u>, <u>Ciaran O'Toole</u>)
- The Ahmadiyya Community's facility on Hayden's Lane needs to be specifically marked as a
 place of worship as well as a community facility, to ensure that the lands are used
 appropriately. (<u>DraftClonSDZ0332</u>, <u>Paul Gogarty</u>)
- 11. Submission from Lucan Pitch and Putt requesting written confirmation that the Clonburris SDZ Planning Scheme is a plan and not an order and that the Pitch and Putt Club cannot be removed from our location unless we agree to same. (DraftClonSDZ0495, Peter Keogh, Lucan Pitch & Putt Club)
- 12. Submission on behalf of Clear Real Estate Investments PLC relates to the Adamstown Extension development area and seeks a number of amendments to the layout of the Adamstown Extension:
 - In broad terms, submission is supportive of the planned character for this area, including its suggested density ranges and building heights. It is considered however that there is the potential on these lands to accommodate a modest number of additional dwellings (+40-50 no. units) compared to that identified in the Draft Scheme and the submission seeks amendment to ensure that the potential for these additional units are capable of being delivered.

The submission proposes amendments to the AE area to increase the Net Development Area to 10.14ha (form 9.19 ha) and increase the Target No. of Units to 487 (increase of 45 units). The suggested changes have implications for the urban design layout, the road network, the





surface water layout etc. The submission includes analysis in relation to transportation, surface water/ flooding, drainage and water supply to support the proposed amendments. (DraftClonSDZ0329, Stephen Little, Clear Real Estate Investments PLC)

Chief Executive's Response

The Draft Planning Scheme designates the Adamstown Extension as a high quality, low to medium density, development that will take the form of an extension of Adamstown. The area will have a target of 442 units that will be 2 to 5 storeys in height. It is a key objective of the Scheme to provide significant and integrated SUDS infrastructure, including a high amenity retention pond/lake within the Griffeen Valley Park and to provide good public lighting to the edge of Griffeen Valley Park that is sensitively designed and operated to reduce disturbance to wildlife particularly bat species.

Pitch and Putt Facilities

The Draft Planning Scheme recognises the importance of recreational facilities on the SDZ lands. The Scheme however has been prepared as a direct result of Government Legislation and these lands are considered by the Government to being of social and economic importance to the State. The lands are also classified as a Major Urban Housing Development Site (MUHDS), and also have been allocated funding under the Local Infrastructure Housing Activation Fund (LIHAF) in 2017. Having regard to the Government Order, and the overarching and strategic outlook for the growth of South Dublin County, these lands are integrated into the overall masterplan for the SDZ lands for residential and ancillary uses.

Fossets site and place of worship/community use

The Scheme recognises the importance of places of worship and multi-faith centres in meeting the diverse religious and cultural needs of the community. The Draft Scheme supports and facilitates the development of places of worship and multi-faith facilities. These however should be located at Clonburris Urban Centre, Kishoge Urban Centre and at other suitable locations where they do not adversely impact on residential amenities and comply with the Planning Scheme.

The priority location principle shall apply to community facilities including places of worship, with site suitability assessment. This assessment should be based on the catchment scale for the proposal, the urban centre hierarchy of the Planning Scheme, the accessibility of the site and the availability of alternative, more suitable sites.

As such, it is considered that the place of worship should be provided in a more suitable location such as the Urban Centres.

In addition, the masterplan indicates important components such as routes, heritage, landscape, water management, urban blocks, key streets and space frontages. It is considered that any changes to the layout would have implications for all these components and as such, it is considered that in the absence of an evidence approach, alternative layouts are not justified.

Flooding

A Strategic Flood Risk Assessment (SFRA) was prepared for the Draft Planning Scheme in accordance with the Planning System and Flood Risk Management Guidelines (OPW/DoEHLG, 2009). The SFRA concludes that there is no overlap between vulnerable land uses within the Planning Scheme and Flood Zone A or B. The SFRA also concludes that there is also no existing development that is at potential risk of flooding.

Playing pitches

The Planning Scheme supports recreation facilities. A requirement of the Draft Planning Scheme is that a Parks and Landscape Strategy (PLS) shall be prepared by all the developers, for the entire SDZ lands and shall be submitted to and agreed in writing with SDCC prior to the commencement of





development on the lands. The PLS shall include overarching design details for the strategic open spaces, local parks and squares, urban spaces and squares, strategic routes and local links and also details of active and passive recreation provision on the lands. As such the details of the playing pitches will be set out in the PLS.

Business park light industry

One of the overarching principles of the Draft Planning Scheme is to support and facilitate growth of the local economy and promote the lands as a location for employment. It is considered that there is significant potential for commercial and economic activities on the SDZ lands however these must be in accordance with sustainable development and achieving sustainable transport. The Planning Scheme provides a spatial framework for the development of the SDZ lands. The Scheme outlines the extent of development permissible in the area and includes for the required provision of employment floorspace. The approach is supported by an evidence basis established through the Employment Floor Space Demand Study.

The employment floorspace will be provided, predominantly to facilitate the development of a vibrant and mixed use centre at the new Clonburris Urban Centre. The distribution of the employment floorspace in the Scheme is related to the accessibility offered by public transport across the lands. The main commercial areas are focused primarily around Fonthill Train Station and to a lesser extent Kishoge Train Station.

The Adamstown Extension area would not be proximate to and integrated with transportation and other land uses in so far as to promote compact urban development and sustainable transport. As such, it is considered that this area would not be appropriate for extensive employment uses.

Increased number of units

This Draft Planning Scheme was prepared to ensure that residential development is appropriately distributed across the SDZ lands in a manner that makes efficient use of transport infrastructure and services while integrating with employment, retail, community and education uses.

The minimum and maximum permissible number of residential units in Clonburris together with target dwelling numbers are set out in Table 2.1.5 of the Draft Planning Scheme.

Residential unit numbers are based on an allowable margin within a prescribed density target for each Development Area (see Section 2.1.5 – Residential Density). For clarity, the maximum permissible number of residential units incorporates flexibility for landmark buildings.

The masterplan indicates important components such as routes, heritage, landscape, water management, urban blocks, key streets and space frontages. It is considered that any changes to the layout would have implications for all these components and as such, it is considered that in the absence of an evidence approach, alternative layouts are not justified.

Chief Executives Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.

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Development Area 12: Canal Extension

- The development of the Clonburris SDZ will result in overlooking of Ashwood Drive. The area proposed for development is currently used by local residents for recreational purposes. (<u>DraftClonSDZ0023</u>, sean gillen)
- 2. The development will result in increased traffic through Ashwood. (<u>DraftClonSDZ0023, sean gillen</u>)
- 3. The proposed development in the vicinity of Ashwood should be moved elsewhere where existing residents will not be adversely affected. (DraftClonSDZ0023, sean gillen)
- 4. Concern is raised over the possibility of opening the Ashwood estate into development at the SDZ lands. Ashwood is a private estate and there is existing unrest with regard to motorbike users coming through the area, without them having a clear exit route through the estate. Traffic congestion would also build as a result, this is already an issue due to the location of existing schools in the area. (DraftClonSDZ0026, Sarah Cleary)
- 5. Ashwood is a close-knit community, with many residents having lived in the estate for decades and there is a feeling that local residents are being overlooked for the sake of the SDZ. (<u>DraftClonSDZ0026</u>, <u>Sarah Cleary</u>)
- 6. Concern from Ashwood resident raised in relation to increased traffic entering Ashwood by reason of more housing and limited accessibility from Bawnogue Road and Saint Cuthbert's Road. (DraftClonSDZ0015, Eva Bowden wade)
- 7. Ashwood resident opposes development to the rear of Ashwood estate by reason of lack of green spaces, impact on quality of life, objection to housing, absence of need for further houses, increase in traffic and impact on traffic safety. (DraftClonSDZ0016, Susan Bermingham)
- 8. Submission objects to proposed housing development to the rear of Ashwood. Concerns are raised in relation to the impact of the development on existing traffic in the area. It is suggested that there are alternative sites available for the proposed development. (DraftClonSDZ0032, Sandra Looney)
- Submission objects to proposed housing development to the rear of Ashwood. Concerns are
 raised in relation to the impact of the development on existing amenities in the area. It is
 suggested that there are alternative sites available for the proposed development.
 (DraftClonSDZ0032, Sandra Looney)
- 10. The traffic getting in and out of Ashwood and Bawnouge at school times is heavy and dangerous. It is already difficult for bin trucks to access the area at these times, on this basis it would be impossible for a fire engine to access the area.
 - A road is proposed at Ashwood Drive where there is a lot of existing trees inhabited by wildlife, including hedgehogs and bats which are protected species.
 - A road proposed at Ashwood Drive will open up the road to more cars and traffic and make it unsafe for children to have the freedom that they are used to.
 - Ashwood is a private estate and concern is raised about building new houses behind it that could be located elsewhere.
 - Whilst the SDZ plans show provision for new schools and community facilities there is concern that the Ashwood area will be provided with residential development only. (DraftClonSDZ0027, Audrey Molloy)
- 11. Development Area 12: Canal Extension should comprise two storey dwellings in keeping with the existing Ashwood and Lindisfarne estates. This is a much better use for this land which is currently used by scrambler bikes.
 - Future residents who live in Development Area 12: Canal Extension will have access to the Grand Canal and the green area to the west for recreation.
 - For Development Area 12: Canal Extension to work properly improvements will need to be

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- made to the junction of Bawnogue Road and the New Nangor Road.
 (DraftClonSDZ0050, Pamela Corrigan, Labour Party Clondalkin Branch/ Dublin Mid West)
- 12. Submission objects to the high rise dwellings and proposed pond to the rear of Ashwood Drive (DraftClonSDZ0045, Kevin Coyle)
- 13. Ashwood resident objects to development to rear of Ashwood by reason of traffic, loss of trees, loss of green space and the potential for high-rise buildings. (DraftClonSDZ0063, Dolores Judge)
- 14. Ashwood resident objects to 121 high rise apartments to rear of Ashwood by reason of building height, traffic, parking, through access, anti-social behaviour, adequacy of bus services and the provision of further social housing. (<u>DraftClonSDZ0070</u>, <u>Fiona Brown</u>)
- 15. Concern is raised however that the proposed high rise developments will decrease the value of the houses and will transform the area into a concrete jungle with constant traffic congestion. The submission states that the estate is already busy and built up without adding any more traffic to it. (DraftClonSDZ0072, Laura Duke)
- 16. 1 or 2 beds houses could facilitate the option for the older people in Clondalkin to down size from there 3/4 bed houses. This is a better option than high rise buildings that will overlook existing houses and also become an eyesore to the area. (<u>DraftClonSDZ0072, Laura Duke</u>)
- 17. The proposed access route through Ashwood will generate traffic congestion, noise pollution and safety concerns for local children. (DraftClonSDZ0072, Laura Duke)
- 18. The proposed access route through Ashwood should be via the main Bawnogue Road instead. (DraftClonSDZ0072, Laura Duke)
- 19. Submission from a resident of Ashwood opposed to any construction to the rear of Ashwood Estate for the following reasons:
 - -Clondalkin is over populated
 - -there is a large proportion of council houses already in the area
 - -the small area of green land that is still available should be protected and used as a local amenity, not more housing
 - -None of the extra amenities in plan are in the Clondalkin area
 - -Traffic Congestion in an already congested area this will also increase with the building of 800 houses planned already in Clondalkin. Clondalkin is not the only area in Dublin which needs to be continually built on.
 - -to date no feeder buses were ever put in place for the residents of Clondalkin to the train station
 - -at present apart from scramblers which is a problem throughout Clondalkin there is no anti social behavior so why entice this by more housing construction
 - -People of ashwood are entitled to view the canal and not have their view obscured by either high rise or standard housing.
 - -A thought should be given to the building of bungalows that will allow residents in the local area options to down size freeing up family homes that can accommodate families (DraftClonSDZ0082, Liam Bermingham)
- 20. Objection to development to rear of Ashwood for the following reasons:
 - -Proposed development will significantly reduce value of the existing houses in Ashwood.
 - -Proposed access will endanger the safety of children and grandchildren
 - -Land should be given to Ashwood football club to develop as an amenity for the children of our and the surrounding area and not housing.
 - -Extra traffic would add to the existing congestion, existing school and surgery impedes access to and from our estate
 - -This land is used by Ashwood and surrounding residents as a walkway for themselves and their dogs
 - -The view to the canal should not be lost because of this development
 - -No extra amenities come with this development all extra amenities are on the Lucan side

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- -Residents were advised of feeder buses to the train station when it opened which never materialised
- -800 houses already planned for Clondalkin enough is enough not all green spaces need to be used for housing
- -There are many arears outside the Clondalkin area that can be used to assist in the housing crisis, it does not always have to be Clondalkin
- -Apart for the scramblers which are a huge Clondalkin problem there is no anti social activity on this land so why encourage it by development of more housing in an already overpopulated area
- (DraftClonSDZ0083, Susan Bermingham)
- 21. View from Canal to Clondalkin Village.
 - The Grand Canal is an amenity that could be better developed for boating, cycling and walking. One of its best views is from the 11th Lock looking towards Clondalkin Village with the famous Round Tower and the Dublin mountains in the background. This would be completely blocked with high rise development at Ashwood.
 - (DraftClonSDZ0088, Patrick Muldowney)
- 22. Building 3 or 4 storey apartments is not in keeping with the existing estate at Ashwood and will overlook houses that have a clear view of the park and the canal.
 - These apartments at Ashwood will have no parking and will obviously try to park in the old part of the estate. Even now the bin trucks have difficulty gaining access to the whole estate. The proposed roads from Ashwood Drive to the new houses need not be a through road but could be a Cul de sac.
 - 2 storey houses similar to existing ones would be far more acceptable.
 - (DraftClonSDZ0088, Patrick Muldowney)
- 23. Protected Species The trees and shrubs at the junction of Ashwood Drive and Ashwood Road are home to a variety of wild life particularly bats which are protected. Putting in a new road would destroy this.
 - (DraftClonSDZ0088, Patrick Muldowney)
- 24. Submission understands that there is a housing crisis at the moment and is not objecting to a development. Concerns raised about the type of structure that is proposed as an extension to Ashwood Housing Estate and makes the following points:
 - 121 units is excessive.
 - 3 or 4 story structures would completely overlook the existing housing in Ashwood and would be out of character as an addition to a mature, settled private estate. Bungalows or similar type housing would be more suitable as an addition to this area.
 - Concerns raised regarding the traffic impact of the proposed extension to Ashwood. Existing traffic is regularly problematic. The new access to the new development from Ashwood Road will cause major disruption to the already problematic traffic issues facing existing residents.
 - Issues with flooding in the area intended to be developed. In 2015, as many as 10 houses adjoining the canal were flooded and extensively damaged (DraftClonSDZ0163, Thomas Lacey)
- 25. Submission from resident of Ashwood Drive protesting to the proposed development to the rear of Ashwood. The following points are made:
 - -The 3 and 4 story apartments are completely out of character with the existing estate and intrude on the privacy of the existing house's and their residents.
 - -The Ashwood estate will become a concrete environment, and the wonderful amenity of the green fields at the Fonthill Road and Canal end of the estate, destroyed.
 - -The plan is made to look pretty with a concrete playground and a pond, the pond is a complete waste of taxpayers' money as only a few yards away we have one of the best man made structures in Ireland on our door step, the Grand Canal.





- -The view from the canal, looking towards Ashwood will be dominated by these Apartments if this goes ahead.
- -The council should be looking to create more park land like Corkagh between Bawnogue and Liffey Valley, and not concrete jungles.
- (DraftClonSDZ0162, Brida Mulligan)
- 27. The building height of the proposed development will obstruct the view of the Round Tower from the Grand Canal. (<u>DraftClonSDZ0079</u>, <u>wendy lynham</u>)
- 28. The building height of the proposed development at the back of Ashwood would not be in keeping with the character of the area and would cause overlooking and overshadowing. (DraftClonSDZ0079, wendy lynham)
- 29. Ashwood Road is the only road into the estate and is already congested. It would not be feasible to accommodate more people in the area. (<u>DraftClonSDZ0079</u>, <u>wendy lynham</u>)
- 30. Submission objects to development to rear of Ashwood for the following reasons:
 - -High rise in sururban area doesn't work
 - -Loss of open space
 - -Concern regarding the stagnation of the lake
 - -Concern regarding the local school and doctor capacity
 - -Concerns regarding construction traffic, road network capacity, train capacity and bus capacity (<u>DraftClonSDZ0170</u>, <u>Stephen Haddock</u>)
- 31. Submission from resident of Ashwood Road regarding the proposed planning of building 3-4 story buildings behind the houses on Ashwood Road and Ashwood Drive raising the following concerns:
 - -There have a number of flooding incidents in Ashwood, homes and cars have been damaged, by flooding and burst water mains. The site proposed for the 3-4 story buildings will be located on a flood plain.
 - -There are number of endangered wildlife in the area, which we were told was the reason that the grass in the area was only cut twice a year then once a year. There are bats and frogs in the area which are protected and their natural habitat will be compromised and will further add to their decline with the constant development and erosion of their natural habitats.
 - -The Round Tower is only visible from the 11th Lough, the only point along the Grand Canal in the area with the back drop of the Dublin Mountain's in the background and this would be obstructed with development of the proposed buildings at Ashwood.
 - -The traffic in the area is already chronic.
 - -The proposed access through Ashwood Estate to the development would have a dire effect to our safety and our children's safety.

 (DraftClonSDZ0168, Stephen O'Reilly)
- 32. Ashwood resident objects to development of apartments to the rear of Ashwood by reason of loss of natural wildlife area, loss of local/community space, loss of children's play area and overdevelopment. (<u>DraftClonSDZ0177, Patrick Oloughlin</u>)
- 33. Ashwood resident objects to development and extension of roads to the rear of the Ashwood estate by reason of traffic congestion, traffic safety, child safety (traffic and SUDS pond), flood risk, stability of lands, loss of view of the Round Tower, loss of trees and loss of walking trails. (DraftClonSDZ0176, Bridget Nolan)





- 34. Submission from resident of Ashwood Close objecting to the entrance way into the set of apartment blocks to be built at the back of Ashwood, Clondalkin and to the idea that these apartments will not have parking spaces as there will be nowhere for them to park.
 (DraftClonSDZ0210, Joseph Lennon DraftClonSDZ0209, Claire Lennon DraftClonSDZ0208, Antoinette Lennon DraftClonSDZ0207, Rose-Ann Lennon)
- 35. Submission suggests building houses/bungalows instead of apartments as they will tower over the area and take away from the area as a whole. (<u>DraftClonSDZ0209</u>, <u>Claire Lennon DraftClonSDZ0208</u>, <u>Antoinette Lennon DraftClonSDZ0207</u>, <u>Rose-Ann Lennon</u>)
- 36. Submission from resident of Ashwood objecting to three and four storey apartments to the rear of existing homes as they will impact on privacy. Also outlined that the land is not suitable to build due to water lying on that land when it rains.
 Submission from resident of Ashwood objecting to the through road as the traffic in Ashwood estate is already in a mess with the school and doctor and it is very frustrating trying to get home with cars parked at all over the entrance, our children will not be safe. Submission requests an alternative route be found.
 (DraftClonSDZ0205, Mary Walsh)
- 37. Submission outlines that there is a school and doctor surgery on Ashwood Road which make it impossible at present so where is all this extra traffic going. The land you are going to build floods in heavy rain and the top and bottom end of Ashwood Drive floods also. Submission expresses concerns in relation to the Lake as Canal is there already and there is enough anti social behaviour over there at present.

 (DraftClonSDZ0201, Mary Haddock)
- 38. Ashwood resident objects to development including the construction of high rise apartments to the rear of Ashwood by reason of impact on landscape, traffic congestion and parking. (DraftClonSDZ0244, roisin domican)
- 39. The units to the rear of Ashwood will have a negative visual impact of the canal and surrounding area and also the view Round Tower from the 11th Lock. (DraftClonSDZ0113, CATHERINE GEOGHEGAN)
- 40. The area behind Ashwood should remain as greenspace for the well being of the residents of Ashwood and surrounding Estates. (DraftClonSDZ0113, CATHERINE GEOGHEGAN)
- 41. The proposed route through the Ashwood estate to the new homes will impact on the residents. (<u>DraftClonSDZ0113</u>, <u>CATHERINE GEOGHEGAN</u>)
- 42. That houses backing onto Ashwood Estate are no higher than two storey's. (DraftClonSDZ0232, Cllr Francis Timmons)
- 43. Submission on behalf of Clondalkin community group suggests that development backing onto Ashwood should be no more than 2 stories in height. (<u>DraftClonSDZ0246, George Graham</u>, Westbourne Community Group)
- 44. Ashwood resident objects to development to rear of Ashwood (CE-S1 area) including 121 high rise units for reasons that include location; separation from bulk of Planning Scheme development; dependence on infrastructure in Bawnogue; building height; opportunity to locate elsewhere on the SDZ lands; health and safety issues (water supply); traffic and parking; child safety; quality of life; environment; and flood risk (existing and proposed homes). It is requested that development proposals be removed from the CE-S1 area. (DraftClonSDZ0247, Jean McCarthy DraftClonSDZ0288, Conor Bracken DraftClonSDZ0181, Ken Kiberd DraftClonSDZ0254, Edel Bracken DraftClonSDZ0520, Peter Stafford DraftClonSDZ0572, Rosaleen Stafford DraftClonSDZ0574, Tuba Abbas DraftClonSDZ0516, Sandra Fleming DraftClonSDZ0330, David Stafford DraftClonSDZ0569, Sean Gillen)
- 45. Clondalkin resident objects to objects to development along southern side of Canal by reason of visual impact and loss of opportunity for community, parkland, recreational, youth and sports facilities. (<u>DraftClonSDZ0249</u>, <u>John O'Brien</u>)





- 46. Clondalkin resident submits that apartments in Ashwood are a concern by reason of flooding, access, traffic and the need for family homes. (DraftClonSDZ0282, Josephine Kavanagh)
- 47. Ashwood resident objects to development to the rear of Ashwood for reason of impact on residential amenity, child safety, traffic, overlooking, height and impact on property values. (DraftClonSDZ0283, Adam Molloy)
- 48. Ashwood resident objects to development to the rear of Ashwood for reasons that include traffic congestion, impact on residential amenity, housing mix (social housing), visual impact, design and crime. (<u>DraftClonSDZ0286</u>, <u>lee ogden</u>)
- 49. Ashwood resident highlights concerns in relation to privacy in Ashwood Drive. (DraftClonSDZ0289, Josephine McNamara)
- 50. Submission from resident of Ashwood objecting to apartments to the rear of existing homes as they will impact on privacy, safety, environment, recreation and the value of housing in a negative way. Concerns expressed regarding visual impact also (DraftClonSDZ0203, Nicola-walsh)
- 51. Submission from resident of Ashwood outlining that Clonburris will greatly affect the flow of traffic through Ashwood. The existing problems will be exasperated if traffic is to use the same entrance and exit from the estate. Also, the addition of a roundabout on Ashwood Road will pose a safety risk to the children playing in the estate. The public transport in Clondalkin is poor at best and this will put more pressure on an already inadequate service. (DraftClonSDZ0203, Nicola Walsh)
- 52. Submission from resident of Ashwood outlining that the wildlife will suffer if housing is built at the back of Ashwood Estate. There are bats, badgers, foxes, hedgehogs and a large number of birds all within the vicinity. Not to mention the ducks, swans and waterfowl that inhabit the canal. All of this wildlife will be effected and indeed may be displaced if building occurs. (DraftClonSDZ0203, Nicola Walsh)
- 53. The impact of the development on Ashwood due to increased traffic congestion and increased anti social behaviour (<u>DraftClonSDZ0306, Sandra Scanlon</u>)
- 54. These land were previously considered too marshy to be considered for a football pitch. (DraftClonSDZ0239, Lorraine Carroll)
- 55. Ashwood should stay as a small housing estate and no new builds should impose on this estate. (DraftClonSDZ0239, Lorraine Carroll)
- 56. Objects to the proposed entrance through the Ashwood Estate due to the existing level of traffic at peak times. This entrance should be located on to the Fonthill Road. (DraftClonSDZ0239, Lorraine Carroll)
- 57. Object to 3-4 storey buildings so close to Ashwood Road and the impact these will have on existing properties. (<u>DraftClonSDZ0239</u>, <u>Lorraine Carroll</u>)
- 58. Submission from resident of Ashwood outlining that the development will adversely impact on Ashwood and objects to development of SDZ on the south side of canal for the following reasons:
 - -Concerns raised regarding the traffic impact
 - -Area to rear of Ashwood floods
 - -Development will interfere with the environment by way of eliminating the aspect of the Round Tower
 - -Council owned lands so social housing assumed. Area has its quota of social housing (<u>DraftClonSDZ0365</u>, <u>June Doyle</u>)
- 59. Submission from resident of Ashwood objecting to the provision of a bypass road through the private estate. (<u>DraftClonSDZ0362</u>, <u>Joseph Howard</u>)
- 60. Issues with the Canal Extension plans for behind Ashwood estate
 - -Ashwood estate cannot handle more traffic.
 - -There was flooding at that area of the estate before it was my understanding that green

Clonburris



area is a floodplain.

- -The view of the Round Tower from that area will be lost. It's the only canal lock that has that view.
- -That green area is used by people to walk dogs and play. (DraftClonSDZ0274, Stephen Daly)
- 61. Submission does not agree with apartments in Ashwood as housing is needed not small apartments that will be taken up by single people and couples not families.
 Submission outlines that Ashwood is prone to flooding and is concerned with building there in general.
 - The entrance into this new estate/apartment block to be accessed through Ashwood is an awful idea. The estate is already overcrowded and busy and that not even at school times. Suggests an entrance from the main road coming from Deansrath/kilmahundrick road (DraftClonSDZ0275, Rachel Kavanagh)
- 62. Submission from resident of Ashwood Road objecting to the building in Ashwood for the following reasons:
 - This plan will have a negative impact on the quality of life for the people in this area that use the green for recreational use.
 - Proposal will have a huge impact on our daily lives, with increase in traffic and distribution to our quiet neighbourhood.
 - Increase traffic and housing in this small area will only add to the congestion and the unhappiness of residents
 - (<u>DraftClonSDZ0276</u>, Anne Daly)
- 63. Submission objects to building behind Ashwood and outlines that Ashwood should be kept separate from this new development i.e. new development should have own new access and exit point on canal road. Ashwood is a private settled estate and putting 120 social units with no parking spaces would destroy the area. Ashwood road cannot take any more volume of traffic due to been used for parking for the doctors surgery and bawnogue school (DraftClonSDZ0277, David lynham)
- 64. The 121 units 3/4 storeys high, to the rear of Ashwood should not be built. (DraftClonSDZ0307, Margaret Hanlon)
- 65. There should be no road through Ashwood to facilitate the proposed development. (DraftClonSDZ0307, Margaret Hanlon)
- 66. The area to the rear of Ashwood has been green space for the past 39 years and should remain such as a 'break' between Ashwood and any new development. (<u>DraftClonSDZ0400</u>, <u>George Hughes</u>)
- 67. Objection to the impact of the proposed building height on the character of the area and on the two-storey properties in Ashwood by way of overbearing impact. (DraftClonSDZ0400, George Hughes)
- 68. The proposed access route through the Ashwood estate would not be popular with Ashwood residents as it would increase traffic flow through the estate. (DraftClonSDZ0400, George Hughes)
- 69. 'Development Area 12 Canal Extension' should be left alone and not be included in the new development. (<u>DraftClonSDZ0400</u>, <u>George Hughes</u>)
- 70. Ashwood resident objects to development to the rear of Ashwood Drive by reason of lack of information/transparency, lack of consideration of existing residents, maintenance of open space, water logging of lands, flood risk to existing housing, exacerbation of traffic congestion, building height (high rise buildings), overlooking, parking, blocking of views of round tower, construction costs (high rise buildings), absence of dwelling mix (smaller houses for downsizing), crime, antisocial behaviour, child safety and loss of open space. (DraftClonSDZ0354, Kay Daly)





- 71. Submission from resident of Ashwood objecting to the development of the locally known Canal field for the following reasons:
 - -Further development at Ashwood in conjunction with the hundreds of units built since Ashwood was constructed will increase the social challenges, unrest and issues for Ashwood residents.
 - -The Canal Extension relies on the infrastructure of Bawnogue and cannot be considered the part of the SDZ plan. The quantum of units in CE should be located to the north of the canal.
 - -The existing water pipe infrastructure is constructed with hazardous materials such as lead and asbestos and the area is not suitable for further development.
 - -Any potential development to the proposed 'Canal Extension (CE-S1)' with access provided through Ashwood will add unacceptable traffic and parking strains on an already extremely congested access road to the Ashwood estate.
 - -The current problems surrounding traffic and parking will only be increased with any proposal to develop on the Canal field.
 - -The Canal field has been flooded on several occasions
 - The current plan includes for 3-4 storey buildings which would overlook residents located on Ashwood Road and Ashwood Drive.
 - The current proposal for area CE-S1 and access to be provided through Ashwood is unacceptable for safety, traffic, environmental, parking, health, community and quality of life reasons for the very concerned residents of Ashwood. (DraftClonSDZ0345, Stephen Gorman)
- 72. Ashwood resident objects to development to the rear of Ashwood by reason of traffic, impact housing estate, exacerbation of flooding, loss of views of Round Tower from the canal, housing mix, concentration of social housing in area, absence of need for development. It is requested that the houses should comprise one bedroom bungalows to allow existing residents to downsize. (DraftClonSDZ0355, Edwin Doyle)
- 73. The status of Ashwood Estate would be changed from private to a non-private estate which will have significant consequences for its residents and the area.

The additional traffic flow through the Ashwood Estate will render the estate inaccessible and dangerous.

At present in Ashwood Estate there is a doctors surgery, the consequences of patients attending the surgery is that there is increase traffic, which creates great difficulty in trying to get in and out of the estate. Also, with a school a school located at the entrance to Ashwood Estate, during school terms, the estate can become very congested. The community cohesion so necessary for social development will be lost, which is something that is badly needed in an area of social housing and social problems. The destruction of wildlife and bat habitats that is reported to reside in the trees at the rear of Ashwood Estate is a concern. This in itself would contravene the Wild Life Act 1976. Opening up Ashwood Estate with another entrance point will lend itself to joyriding and anti-social behaviour, which will have a detrimental effect on the health and the safety of residents.

The land that is designated for development is currently a flood plain that prevents the area from flooding.

(<u>DraftClonSDZ0106</u>, Ronald Gunning)

74. Submission from Ashwood resident objects to development to rear of Ashwood by reason of building height (3-5 storey apartments), loss of parkland, loss of views of the canal, exacerbation of traffic congestion, absence of new road proposals, loss of views of the round tower from 11th lock. It is suggested that the number of units be reduced, development be relocated to the northern side of the Grand Canal and improvement be made to road infrastructure public transport, health services and emergency services. (DraftClonSDZ0373, Alan Ryan)





- 75. The proposed extension of Ashwood estate is very ill-considered. The estate is small with narrow roads, the extra traffic will add to the already existing bottleneck due to the local school and doctor's surgery.
 - The existing homes at Ashwood Road, Drive and Close will lose their privacy by being overlooked by apartments.
 - Ten years ago the site was deemed to be unsuitable for development due to flooding. The construction of a pond at this location represents a health and safety issue and puts children at risk.
 - There are a lot of housing units being built in Clondalkin, housing should be allocated across the country.
 - Clondalkin residents will lose the amenity offered by the Grand Canal, including walking and cycling facilities.
 - (DraftClonSDZ0103, Thomas & Marian Murphy)
- 76. Ashwood resident raises concern in relation to development to the rear of Ashwood estate by reason of location, impact on residents and loss of green space. (Darren Cullen)
- 77. Clondalkin resident raises concern in relation development to the rear of Ashwood by reason of excessive housing, building height, insufficient roads and traffic congestion. (DraftClonSDZ0379, James Milton)
- 78. Ashwood resident objects to development to the rear of Ashwood for reasons that include density, height, overshadowing, proximity to houses, character of development, traffic congestion, over population and danger from drainage. (DraftClonSDZ0418, Seamus & Kathleen Finn)
- 79. The proposed extension of Ashwood estate is ill-considered and will ruin the character of the area.
 - The proposed development would diminish the views into the centre of Clondalkin village and the Round Tower.
 - The increased traffic as a result of additional dwellings will make it almost impossible for current Ashwood estate residents to come and go. The extra traffic will add to the already existing bottleneck due to the local school and doctor's surgery.
 - The existing homes in the Ashwood area will lose their privacy.
 - Ten years ago the site was deemed to be unsuitable for development due to flooding. The construction of a pond at this location represents a health and safety issue and puts children at risk.
 - (DraftClonSDZ0182, Carmel & Willaim Burke)
- 80. Submission raises concerns in relation to the development to the rear of Ashwood by reason of the location of the water main and gas main, the height of the development, traffic, car parking and the view of 10th lock. (<u>DraftClonSDZ0442</u>, <u>Tony Lawlor</u>)
- 81. The lands have been subject to flooding in the past, and this would be exacerbated by the proposed development. Increased flood risk will have an impact on securing home insurance and the ability to sell the house in the future. (DraftClonSDZ0466, Brian Thunder DraftClonSDZ0461, Maura Thunder DraftClonSDZ0464, Claire Thunder DraftClonSDZ0465, Emma Thunder)
- 82. The Ashwood estate is a small private estate with a cul de sac. (<u>DraftClonSDZ0466, Brian Thunder DraftClonSDZ0461, Maura Thunder DraftClonSDZ0462, Liam Thunder DraftClonSDZ0463, Louise Thunder DraftClonSDZ0464, Claire Thunder DraftClonSDZ0465, Emma Thunder)</u>
- 83. The development will interfere with the aspect of the Round Tower from the Canal. (<u>DraftClonSDZ0466</u>, <u>Brian Thunder DraftClonSDZ0461</u>, <u>Maura Thunder DraftClonSDZ0462</u>, <u>Liam Thunder DraftClonSDZ0463</u>, <u>Louise Thunder DraftClonSDZ0464</u>, <u>Claire Thunder DraftClonSDZ0465</u>, <u>Emma Thunder</u>)





- 84. The area has its quota of social housing with the following estates Lealand, Lindisfarne, Dunawley, Deansrath, Kilcronan, Kilmahuddrick, Oldchurch, Nangor Crescent. IT is suggested that the development to the rear of Ashwood consist of one bed bungalows for local residents or council tenants to downsize to. This would free up private and local authority properties for sale and re-letting. (DraftClonSDZ0466, Brian Thunder DraftClonSDZ0461, Maura Thunder DraftClonSDZ0462, Liam Thunder DraftClonSDZ0463, Louise Thunder DraftClonSDZ0464, Claire Thunder DraftClonSDZ0465, Emma Thunder)
- 85. Development to the rear of the Ashwood estate is a concern as traffic in the area is very congested in the mornings due to school journeys and an existing doctors surgery. Additional cars resulting from the development will make this situation worse. (DraftClonSDZ0190, christy garrett)
- 86. Ashwood is already congested in particular due to the schools and the doctors practice. (DraftClonSDZ0440, Mary Ginty)
- 87. Ashwood drive has been affected by flooding. (DraftClonSDZ0440, Mary Ginty)
- 88. There is no parking facilities for the proposed development to the rear of Ashwood. (DraftClonSDZ0440, Mary Ginty)
- 89. Concern in relation to the high density of the proposed development and the resulting overlooking issue. (<u>DraftClonSDZ0440</u>, <u>Mary Ginty</u>)
- 90. Apartment development at the back of the Ashwood estate will not fit in with the existing character of the area. Houses similar to those of the existing area should be built at this location.
 - Opening up the road at Ashwood Drive is a concern for traffic in the area.

 Development at the Canal Extension should fit in with the existing established community.

 Losing the green area near the Canal is a concern for residents in the area.

 (DraftClonSDZ0259, Caitriona McGrath)
- 91. Submission outlines concerns in relation to the Canal Extension, in particular the views of the Ashwood residents and seeks that the existing houses are no overlooked and the access to the development is via the existing arterial routes and not through Ashwood estate.

 (DraftClonSDZ0502, Ed O'Brien & John Curran TD, Fianna Fail Dublin Mid West)
- 92. The visual aspect of the Round Tower from the 11th Lock in Clondalkin should be preserved in order to promote the rich cultural heritage of Clondalkin and the newly developed Round Tower Visitor Centre. (DraftClonSDZ0308, Madeleine Johansson, People Before Profit)
- 93. Submission from resident of Clondalkin outlines that the access to Ashwood Estate is not suitable for further traffic movements caused by the Canal Extension. (
 DraftClonSDZ0501">DraftClonSDZ0501,
 Nichola Flynn">Nichola Flynn)
- 94. Submission outlines concerns in relation to the Canal Extension from the point of view of traffic volume, loss of privacy and loss of amenity. (<u>DraftClonSDZ0501</u>, <u>Nichola Flynn</u>)
- 95. The traffic impact on existing communities needs to be reviewed. For example, the plan includes housing units at the back of Ashwood estate, however it doesn't indicate any additional roads to support the extra traffic. The entrance to Ashwood estate is already congested during peak hours. A review of the impact on existing housing estates should be carried out.
 - (DraftClonSDZ0308, Madeleine Johansson, People Before Profit)
- 96. Submission from resident of Ashwood opposing the road access to the Canal Extension proposal by reason of children safety, volume of traffic and noise and air pollution. Further concerns expressed regarding overlooking from 3 to 4 storey apartments. (DraftClonSDZ0494, Rita Fitzsimons)
- 97. Objects to any development over 3 storey adjacent to the existing estates of Cappaghmore and Ashwood to prevent overlooking. (<u>DraftClonSDZ0498</u>, <u>Cllr Breeda Bonner</u>)
- 98. Existing trees along boundaries of existing estates should be preserved to enhance privacy, in particular at Ashwood and Cappaghmore. (<u>DraftClonSDZ0498</u>, <u>Cllr Breeda Bonner</u>)





- 99. Objection to the units to the 121 3 or 4 storey high rise flats with no parking and a few entrances through and overlooking Ashwood Road and Drive. The train service from Fonthill only suits a certain few people and the promised feeder bus service has not happened. Kishoge station is not opened and is too far away. (DraftClonSDZ0492, Jim Milton)
- 100. As a compromise, it is recommended that all infrastructure i.e. roads, schools, shops and houses be built first and spread the quantity of houses with 2000 houses in Clonburris, Lucan, Peamount, Tallaght, open space along the M50, and towards the mountains. It is recommended that 1 or 2 bedroom dormer bungalows would be more appropriate in this location. In addition, these units would be a solution for people who would like to downsize and also would allow 3 bedroom houses to become available for new families. (DraftClonSDZ0492, Jim Milton)
- 101. The size of the development is completely out of proportion to the existing houses in the area. (<u>DraftClonSDZ0509</u>, <u>B Doyle DraftClonSDZ0582</u>, <u>Gavin Doyle DraftClonSDZ0584</u>, <u>Noel Doyle DraftClonSDZ0585</u>, <u>Breeda Doyle DraftClonSDZ0586</u>, <u>Simon Doyle</u>)
- 102. The location is inappropriate for this development and indicates a lack of thought in the planning process. (<u>DraftClonSDZ0509</u>, <u>B Doyle DraftClonSDZ0582</u>, <u>Gavin Doyle DraftClonSDZ0584</u>, <u>Noel Doyle DraftClonSDZ0585</u>, <u>Breeda Doyle DraftClonSDZ0586</u>, <u>Simon Doyle</u>)
- 103. Concerns raised in relation to access to the proposed development through Ashwood. There are existing traffic issues for Ashwood and Alpine Heights each morning. Additional traffic on an existing narrow road seems ludacris and dangerous and would not be a safe place for children to play. (DraftClonSDZ0582, Gavin Doyle DraftClonSDZ0584, Noel Doyle DraftClonSDZ0586, Simon Doyle)
- 104. The view from the 11th Lock of the Grand Canal towards the Round Tower would be blocked and this would reverse the good work carried out in opening the heritage centre and attracting visitors to Clondalkin. (DraftClonSDZ0582, Gavin Doyle DraftClonSDZ0584, Noel Doyle DraftClonSDZ0584, Noel Doyle DraftClonSDZ0585, Breeda Doyle DraftClonSDZ0586, Simon Doyle)
- 105. Concern that the environmental impact of the proposed development has not been fully considered. The lands to the rear of Ashwood have been acting as a flood plain for the Grand Canal since it was first built. (DraftClonSDZ0582, Gavin Doyle DraftClonSDZ0584, Noel Doyle DraftClonSDZ0584, Noel Doyle DraftClonSDZ0585, Breeda Doyle DraftClonSDZ0586, Simon Doyle)
- 106. Opposes the building of the proposed Clonburris SDZ in particular in relation to traffic volumes and traffic safety, building height, parking, views of Round Tower and the lands have been known to flood. (<u>DraftClonSDZ0524</u>, <u>John Roche DraftClonSDZ0521</u>, <u>Sarah Roche DraftClonSDZ0522</u>, <u>Carol Roche DraftClonSDZ0523</u>, <u>Catherine Roche DraftClonSDZ0551</u>, <u>Michael Roche DraftClonSDZ0552</u>, <u>Ciara Toner DraftClonSDZ0553</u>, <u>Greg Toner DraftClonSDZ0554</u>, <u>Jennifer Toner DraftClonSDZ0555</u>, <u>Bernadette Toner DraftClonSDZ0556</u>, <u>Lorna Toner DraftClonSDZ0557</u>, <u>Martin Toner</u>)
- 107. Submission raises a number of points, including concern in relation to the high rise apartments at Ashwood. Development will impose on the landscape and the create additional traffic issues (DraftClonSDZ0560, Sandra McLoughlin DraftClonSDZ0561, Tara Jenkins DraftClonSDZ0562, John McLoughlin DraftClonSDZ0563, Tracey Boland DraftClonSDZ0602, Catherine Scanlon DraftClonSDZ0603, Vincent Scanlon)
- 108. Development of land along the canal at 11th lock area will obstruct the only view of the round tower from a water way in Ireland. (<u>DraftClonSDZ0560</u>, <u>Sandra McLoughlin</u> <u>DraftClonSDZ0561</u>, <u>Tara Jenkins DraftClonSDZ0562</u>, <u>John McLoughlin DraftClonSDZ0563</u>, <u>Tracey Boland DraftClonSDZ0602</u>, <u>Catherine Scanlon DraftClonSDZ0603</u>, <u>Vincent Scanlon</u>)





- 109. Removal of green belt from area is depriving all locals, young and old of an amenity (<u>DraftClonSDZ0560</u>, <u>Sandra McLoughlin DraftClonSDZ0561</u>, <u>Tara Jenkins DraftClonSDZ0562</u>, <u>John McLoughlin DraftClonSDZ0563</u>, <u>Tracey Boland DraftClonSDZ0602</u>, <u>Catherine Scanlon</u>
 - <u>DraftClonSDZ0603, Vincent Scanlon</u>)

 DraftClonSDZ0603, Vincent Scanlon)
- 110. Submission from resident of Ashwood objecting to the proposed development to the rear of Ashwood by reason of the estate being at full capacity for traffic and parking and access through private estate to a Local Authority Development. Extra traffic in estate leads to safety issues on our roads.
 - (<u>DraftClonSDZ0601</u>, <u>Laura Flood</u> <u>DraftClonSDZ0595</u>, <u>Sandra Flood</u> <u>DraftClonSDZ0596</u>, <u>Sumaira Milik</u> <u>DraftClonSDZ0597</u>, <u>Sean Flood</u> <u>DraftClonSDZ0598</u>, <u>Joan Flood</u> <u>DraftClonSDZ0599</u>, M Flood <u>DraftClonSDZ0600</u>, Mark Flood)
- 111. Proposal to build 4 storey apartment are not in keeping with the area and will be an eyesore and overlook houses.
 - (DraftClonSDZ0591, Margaret Madden)
- 112. Submission outlines the green is a flood trap (<u>DraftClonSDZ0589</u>, <u>Laura Madden</u>)
- 113. Submission from resident of Ashwood objects to the building of the proposed Clonburris SDZ and outlines that this green area (assumed as Ashwood) are currently safe areas used for dog walking. Submission objects to building due to the wildlife impact. (DraftClonSDZ0589, Laura Madden)
- 114. Concerns raised relate to the impact of the proposed road on the already congested Ashwood Estate. The impact of the proposed development on the bat population which would be contrary to the Wild Life Act 1976. Concern also raised in relation to the protection the land provides to the Ashwood Estate from flooding. Concern also in relation to the social implications of high density development in this location. (DraftClonSDZ0539, Ann Gunning)
- 115. Concerns raised relate to the impact of the proposed development on the already congested Ashwood Estate. (<u>DraftClonSDZ0580</u>, <u>Carole Brennan</u>)
- 116. Concerns raised relate to the impact of the proposed development on the already congested Ashwood Estate. Concern also raised in relation to the protection the land provides to the Ashwood Estate from flooding. Concern also in relation to the social implications of high density development in this location.
 (DraftClonSDZ0579, Luke Brennan)
- 117. The submission relates to the proposed development to the rear of Ashwood estate. Concerns raised relate to the impact of the proposed development on the already congested Ashwood Estate. (DraftClonSDZ0575, Annette Thornberry)
- 118. Concerns raised relate to the impact of the proposed road on the already congested Ashwood Estate. Concern also in relation to the impact of high density development in this location on property values in Ashwood.
 - (DraftClonSDZ0558, Liam & Margaret McGuinness)
- 119. Submission objects to the planning of apartments on the canal end of Ashwood as it will bring too much traffic to the area, affect wildlife and the land is a flood plain.

 (DraftClonSDZ0578, Catherine McGlynn)
- 120. Concerns raised relate to the impact of the proposed road on infrastructure, traffic, litter, policing, transport, density and green space amenities. (DraftClonSDZ0481, Bernadette Ward)
- 121. Submission expresses objection to the proposed development between Ashwood and the Canal and makes the following points:
 - Size of the development, high rise housing referenced
 - Location adjacent to existing houses on the green is wrong
 - Access to the development through estate will create traffic and decrease safety
 - Visual impact of the development on the area, particularly the Round Tower

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- Environmental impact of the development area is a flood plain for the canal (DraftClonSDZ0583, Tanja Rechnar)
- 122. Concerns raised in relation to the development to the rear of Ashwood in particular the traffic impact of the proposed road. Objects to a 4 storey building behind Ashwood. (DraftClonSDZ0460, Noel McKenna)
- 123. Submission objects to the development at Ashwood and outlines that more people are not needed in the area. Submission implies that the Ashwood area is not connected to the SDZ and was never in the planning. (DraftClonSDZ0567, Kathleen McGrath)
- 124. Concern relating to the traffic impact of the proposed development on the Ashwood estate.

(DraftClonSDZ0459, Joan McKenna)

- 125. Submission outlines that the 121 units to the rear of Ashwood will adversely impact on Ashwood for the following reasons:
 - Area of Ashwood suffers from flooding
 - Traffic access via the estate
 - Eliminating the aspect of the Round Tower
 - Requests that the development consists of one bed bungalows for downsizing
 - No objection to the SDZ on the north side of canal and outlines housing needed. (DraftClonSDZ0538, Amelia Smith)
- 126. The development of Ashwood will alter impact on the rich biodiversity of the Clonburris Great Parkland area (<u>DraftClonSDZ0606, Sandra Scully</u>)
- 127. Submission details that the provision of a pond in the Canal Extension area will drain the area and adversely impact on biodiversity and wildlife. (DraftClonSDZ0606, Sandra Scully)
- 128. Submission outlines that road access should not be via Ashwood as it will cause increased traffic, pollution, anti social behaviour and parking. (DraftClonSDZ0606, Sandra Scully)
- 129. Objection is raised with regard to the construction of residential units adjacent to the existing Ashwood estate. Concern is raised with regard to proposed building heights and additional vehicular traffic in the area. The existing road network is congested due to local schools, and the proposed development would be hazardous to the local area. (DraftClonSDZ0455, Graeme McKenna)
- 130. Objection is raised with regard to the construction of residential units adjacent to the existing Ashwood estate. Concern is raised with regard to proposed building heights and additional vehicular traffic in the area. (DraftClonSDZ0456, Gillian McKenna)
- 131. Objection is raised with regard to the construction of residential units adjacent to the existing Ashwood estate; this is considered an intrusion of privacy. The proposed road through the area is not safe and would put children at risk, due to increased traffic resulting from the development of Clonburris. (<u>DraftClonSDZ0457</u>, <u>Suzanne Richardson</u>)
- 132. Objection is raised with regard to the construction of residential units adjacent to the existing Ashwood estate; concern is raised with regard to proposed building heights. Concern is also raised with regard to the proposed road through the area, due to increased traffic resulting from the development of Clonburris and lack of adequate parking facilities. (DraftClonSDZ0458, Gerard McKenna)
- 133. The proposed development adjacent to the Ashwood residential estate would not be compatible with the existing housing in the area.
 - The development would increase the amount of vehicular traffic into the area. There are current problems with traffic congestion in the area, due to parking associated with the doctor's surgery and existing primary school.
 - The land for the proposed development is located in a flood plain and becomes boggy when there is excessive rainfall. It is proposed to incorporate Sustainable Urban Drainage (SUDS)





infrastructure in the development, but guarantees to ensure that these do not overflow due to excessive rainfall are not included.

(DraftClonSDZ0515, Christopher Conway)

134. The design of proposed development adjacent to the Ashwood residential estate is intrusive and not in keeping with the established development structure. The Ashwood estate is afforded no buffer from the proposed development unlike other existing residential estates in the area.

The height of development adjacent to the Ashwood estate will have a negative visual impact on the Round Tower, Clondalkin, the Grand Canal and the Dublin Mountains. Proposed development adjacent to the Ashwood residential estate will result in increased traffic volumes in the area. Access to the development in this area should be from Lock View Road and Bawonogue Road junction only.

Concern is raised that existing trees in the Ashwood area will not be retained as part of development plans at Clonburris.

The proposed development will result in anti-social behaviour, including joy riders, motor bikes and quad bikes in proximity to the Ashwood residential area.

The proposed development will result in parking issues in the Ashwood residential estate. All proposed green routes in proximity to the Ashwood residential estate should be via Lock View Road over to Grand Canal Way.

(<u>DraftClonSDZ0514</u>, The Tracey Family)

135. The density of development proposed adjacent to the Ashwood residential estate is too high. Privacy of existing dwellings and gardens will be affected.

There is no parking provision for the Canal Extension development area.

One of the proposed exit / entrances is at the corner between Ashwood Drive and Ashwood Road. There is existing traffic congestion in this area.

There appears to be no amenities located within the Canal Extension development area, these appear to be located on lands to the north of the Grand Canal only.

The Canal Extension development area is located on a flood plain. There is a pond proposed in this area for drainage, this could serve to increase home insurance premiums in the area. There is a large amount of existing social housing in the area and this is considered enough. The development of the SDZ lands will have a negative impact on existing wildlife, protected species and habitats in the area.

There is existing traffic congestion in the area, including that arising from the existing doctor's surgery. The proposed development will result in increased traffic congestion in the area.

Concern is expressed with regard to commitment to the delivery of public transport options to serve the SDZ.

(DraftClonSDZ0518, Maeve Flynn)

- 136. Development proposed to the south of the Grand Canal should be moved to the north and the existing green space at Ashwood should be retained. There should also be no access from Ashwood to the development. (<u>DraftClonSDZ0223</u>, <u>Trevor Gilligan</u>)
- 138. The proposed construction of high-density housing and introducing a further 21,000 residents into the area, is not properly considering the current road infrastructure that is in existence. Specifically, the main road through Bawnogue and the road which services the Ashwood estate, both of which are operating at full capacity and it is extremely difficult to gain access to the main roads leading from these areas. The existing road structure will not be able to accept the increase in traffic and will lead to longer delays and serious health and





safety concerns for the parents of the area whose children attend the local schools in the Bawnogue / Deansrath / Cherrywood areas. (DraftClonSDZ0223, Trevor Gilligan)

139. It is proposed to build a substantial number of houses on a flood plain which will cause a tremendous amount of difficulties for the residents of the area during heavy rain conditions which are very prevalent throughout the year. (DraftClonSDZ0223, <a href="https://prevor.gov/Trevor.go

Chief Executive's Response

The development of the Canal Extension was raised as a topic 139 times in the submissions received. Predominantly, the topic was raised by residents of Ashwood estate and included concerns about the proposed access road; car parking provision; traffic impact; traffic and pedestrian safety; residential impact; building height; scale of development; location, type, tenure and number of houses; impact on quality of life; flooding; views of the Round Tower; anti-social behaviour; impact on biodiversity and protected species; trees; phasing of infrastructure; use of the Canal as an amenity; loss of green fields; surface water pond; and location of water and gas main.

The Draft Planning Scheme has been designed with strong connections to existing, established communities surrounding the SDZ area including the Ashwood area. This area will take the form of an extension to Ashwood and it is important, therefore, that the urban structure between the SDZ area and the surrounding areas is highly connected and seamless.

The Draft Planning Scheme designates Canal Extension as a high quality medium density residential development, to the south of the Canal. The area has a target of 121 units upto 4 storeys in height. It is a key objective for the area to prioritise pedestrian and cyclist movement and provide significant and integrated SUDS infrastructure, including a high amenity retention pond/lake within the Canal corridor.

Access, Traffic & Car Parking

The proposed development to the rear of Ashwood will be served by a new vehicular access from Bawnogue Road. There will also be two new connections from the proposed development into Ashwood Road. These accesses are required to connect the proposed development with the existing residential area. In addition, these accesses offer existing and proposed residents route choice thus helping to dissipate traffic in the area. This is in accordance with the recommendations of the Design Manual for Unban Roads and Streets (DMURS), which are statutory guidelines that have been issued by the Minister for the Environment, Community and Local Government under Section 28 of the Planning and Development Act 2000 (as amended).

The car parking standards for Clonburris are consistent with those of the South Dublin County Council Development Plan 2016 –2022. It should be noted that the detail design of the development shall demonstrate compliance with the Planning Scheme at planning application stage including car parking provisions.

In relation to public transport, the development will be within walking distance of Clondalkin/Fonthill Railway Station and bus routes. The Draft Planning Scheme has developed a transport framework that maximises route choice and access to residential, education, retail, service, community and leisure uses by means of walking, cycling and public transport while balancing the needs of the car.

Design and Residential impact/Building heights

In order to promote place making, urban legibility and visual diversity, varied building heights are supported across the SDZ lands. Building heights have been designated under this Planning Scheme





in a manner that recognises the importance of place making and also reflects other aspects of this scheme including density and urban structure requirements such as the primacy of Urban Centres, Link Streets and Arterial Streets.

To ensure that building heights respect the surrounding context, new developments immediately adjoining existing one and two storey housing shall incorporate a gradual change in building height with no significant marked increase in close proximity to existing low-rise housing.

A separation distance of 22 metres should generally be provided between directly opposing above ground floor windows to maintain privacy between residential schemes.

In this regard, it is considered appropriate to clarify that the building height in this area (Table 3.3.12) is 2-4 storey.

Social Housing

All development on the lands shall comply with the requirements of Part V of the Planning and Development Act, 2000 - 2016 (as amended) and with the South Dublin County Council Housing Strategy with regard to the provision of Social and Affordable Housing (if further amended). A 10% social housing requirement, pursuant to Part V of the Planning and Development Act 2000 - 2016 (as amended) is required to all sites in the Planning Scheme that are solely for residential use, or for a mixture of residential and other uses (save where the development qualifies for a modified or amended obligation or is otherwise exempted)

The design and layout of individual dwellings and apartments will have to comply with the *Quality Housing for Sustainable Communities Guidelines (2007)* and *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2015)*

Dwelling types

The range of dwellings permitted in Clonburris include houses, townhouses, duplex units, maisonettes and apartments. In order to facilitate market flexibility over the lifetime of the Planning Scheme, a detailed breakdown of unit types is not specified. Prescribed densities and building heights (see Section 2.8 Built Form and Design) will, however, help inform the appropriate dwelling typologies in each Development Area

Having regard to the above, the Draft Planning Scheme ensures that new residential development is carried out in accordance with Government policy in relation to the development of housing and residential communities, catering for a range of dwelling types, sizes and tenure options.

Flooding and Surface Water Pond

SDCC is committed to surface water management, aquifer protection and flood risk management at Clonburris. To inform a robust and evidence based approach to surface water drainage and flood risk management, a Surface Water Strategy (SWS) has been carried out and forms part of the accompanying documents to the Draft Planning Scheme.

In addition, a Strategic Flood Risk Assessment was carried out and the findings of which informs the Draft Planning Scheme. A strategic approach to the management of flood risk is important in Clonburris as it is primarily a greenfield development site, without any existing development in Flood Zone A/B.

The SWS for the Clonburris SDZ prioritises the sustainable management of surface water, to ensure that there is no unacceptable residual risk of flooding to each development site, mitigating against increased flood risk up or downstream from each development site, and to manage the amount of

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surface water entering the local piped sewer system and watercourses, including the Griffeen and Camac Rivers.

Measures in public realm and open space areas could include, for example, ponds/wetlands, detention basins, infiltration basins and filter strips. Ponds could be integrated as amenity and ecology features within parks and open spaces and be utilised as a local amenity within the overall SDZ scheme, as well as providing the additional volumetric storage required during extreme rainfall occurrences (i.e. 1 in 100 year storm events). The type, design and exact location for the pond attenuation areas is required to be agreed at detailed design stage.

Views of the Round Tower

Further to concerns in relation to the impact of the development on the Round Tower in Clondalkin, it is advised that the tower is located approximately 1.5 kilometres to the south-east of the 11th Lock and views of this structure from the SDZ lands are limited.

Within the context that the Planning Scheme sets back buildings by a minimum of 50 metres from the Grand Canal and the scheme provides for reduced building heights and a reduced building footprint compared to the Clonburris Planning Scheme and Local Area Plan (2008), it is considered that the subject Planning Scheme will not have a significant impact on proximate views of the Round Tower. It is also advised that it is a function of a County Development Plans to protect views and prospects and, within this context, the Round Tower in Clondalkin is not designated as a prospect under the South Dublin County Council Development Plan 2016 – 2022.

Anti-social behaviour

The Draft Planning Scheme complies with best practice guidance in relation to Designing Out Anti-Social Behaviour. An increased scale of development brings activity and increased frequency and duration of activity discourages anti-social behaviour. The Draft Planning Scheme provides for a greater mix of land uses and dwelling tenure types. Mixed uses including retail, residential and commercial ensure that areas remain lively throughout the day and into the evening, thus promoting security. Consideration has been given to walking distances to public transport and local services. Environments that are more pedestrian-friendly generates more casual social interaction, informal supervision and thus, security.

Impact on biodiversity and protected species

The Draft Planning Scheme has been prepared with the aim of achieving a balanced provision of a new high quality, urban residential environment while protecting, enhancing and sensitively upgrading the natural heritage and biodiversity assets of SDZ lands. The Draft Planning Scheme requires all development proposals should seek to enhance biodiversity and avoid or minimise loss of existing habitats and wildlife corridors. Given the biodiversity value of the SDZ lands, a Biodiversity Management Plan (BMP) is required to be prepared by a qualified Ecologist and be guided by relevant best practice guidelines and established techniques for habitats present on the SDZ lands. The BMP shall form part of the Parks and Landscape Strategy. (See Section 2.10 Parks and Landscape Strategy). As such, no change is proposed to the Draft Planning Scheme.

Phasing of infrastructure

There are 18 pieces of infrastructure required to be linked to the delivery of residential development. The infrastructure will be required to be provided over 4 phases and phased in accordance with the construction of residential units. These include schools, parks, bridges, fire station, health centre and opening of the Kishoge Station.





Services

Figure 2.9.1 of the Draft Planning Scheme details the strategic water network for the entire SDZ lands including the location of the water main in Ashwood. Prior to the commencement of any development within the SDZ, landowners/developers shall prepare detailed water services plans for the SDZ and agree these plans with Irish Water and SDCC. Such plans must align with Irish Water's Strategic Network Development Plans. Such plans must also comply with Irish Water standard details and codes of practice. Connection of infrastructure to a public water services network is subject to a connection agreement with Irish Water.

The SDZ lands can be serviced by existing high pressure transmission gas pipes that run in a north – south direction adjacent to the Fonthill Road and the Grange Castle Road. Future provision for infrastructure requirements for gas supply will be made in consultation with relevant energy providers and other stakeholders.

Chief Executive's Recommendation

It is recommended that Table 3.3.12 be amended as follows:

Area Character type	Medium density residential infill development
	to the south of the Canal adjacent to existing
	Grand Canal Park.
Net development area	2.27ha
No of units (Target)	121
Average Net Density (Target)	Sub Sector CE-S1 Average Net Density (Target)
	53 * See also Table 2.1.5 for full range of
	density
Affordable/Social dwellings	To be negotiated in accordance with relevant
	legislation and SDCC Housing Policy
Building height	Sub Sector CE-S1 3-4 2-4 storey
	* See also Figure 3.3.2 Building Height Concept

Strategic Environmental Assessment of Chief Executive's Recommendation

No interaction with Strategic Environmental Objectives.

Appropriate Assessment Screening of Chief Executive's Recommendation

No significant adverse impacts on European sites within the SDZ's zone of influence are predicted.

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Chapter 4.0 Phasing

- Open Kishogue railway station prior to the construction of dwellings. This station is needed immediately to provide transport to those who live in existing nearby estates and who work in Grangecastle Business Park, especially now that there is a city centre link via the Phoenix Park Tunnel. The opening of this station would also provide good public transport to the construction workers building houses and other buildings at the Kishogue end of the SDZ. (DraftClonSDZ0050, Pamela Corrigan, Labour Party Clondalkin Branch/ Dublin Mid West)
- 2. In the first phase of the roll out of the SDZ, or beforehand, provide a regular bus service (at least two per hour) from Lucan to Tallaght via Liffey Valley, Clonburris and Clondalkin. This will provide decent public transport between these neighbouring suburbs and aid people to access good shopping facilities, the Institute of Technology in Tallaght, Tallaght Hospital and Maynooth University.
 - (DraftClonSDZ0050, Pamela Corrigan, Labour Party Clondalkin Branch/ Dublin Mid West)
- 3. The submission raised concern in relation to the timing of the opening of the Kishoge Railway station, in particular the large number (approx. 16,000) of new residents in the area. (DraftClonSDZ0040, Foxborough Residents Group Lucan, Foxborough Residents Group)
- 4. The submission notes that Kishoge Train Station remains closed. (<u>DraftClonSDZ0071, Ciara Enright</u>)
- 5. The submission also notes that there is no provision for the Luas for Lucan. (DraftClonSDZ0071, Ciara Enright)
- 6. Clondalkin resident outlines concerns in relation to traffic by reason of traffic congestion along Fonthill Road, proximity to Adamstown, proximity to Clondalkin Town Centre, potential inadequacy of BusConnect, limited train services. It is suggested that the DART underground be a requirement of the scheme. (<u>DraftClonSDZ0062, Dylan Nolan</u>)
- 7. Lucan resident highlights concern in relation to increased traffic in the Griffeen Area from the proposed scheme particularly peak morning traffic. It is suggested that the area needs investment in public transport before any further development. (DraftClonSDZ0213, Siobhan Walsh)
- Lucan resident highlights concern in relation to number of trips that will be generated by the
 proposed Planning Scheme, traffic congestion along the Outer Ring Road and Lucan and the
 absence of plans to frontload public transport (Luas and DART). (<u>DraftClonSDZ0217, Frank</u>
 <u>Hynes</u>)
- Resident raises concerns in relation to the timing and phasing of schools, medical facilities, retail and public transport in relation to residential development. (<u>DraftClonSDZ0244, roisin domican</u>)
- 10. Submission on behalf of Clondalkin community group requests the provision of infrastructure prior to development. (<u>DraftClonSDZ0246</u>, <u>George Graham</u>, <u>Westbourne Community Group</u>)
- 11. Clondalkin resident submits that transport needs to be put in place before housing begins. (<u>DraftClonSDZ0282</u>, <u>Josephine Kavanagh</u>)
- 12. Submission from a former resident of the Adamstown SDZ objecting to the school phasing, in particular the proposals to allow a site to be set-aside for a school only after the first 1000 dwellings have been completed. Lucan primary schools are currently at peak capacity, with only one new school being planned. Lucan simply doesn't have the capacity to absorb the thousands of school goers that will live in Clonburris. As with Adamstown SDZ, both primary and secondary school building should start before any houses can be sold, with strict rules on the developer to complete each building within one year of commencing said construction. (DraftClonSDZ0271, John Donohue)
- 13. Submission outlines that there is a lack of transport investment prior to development will be detrimental to the Lucan Area. (<u>DraftClonSDZ0278</u>, <u>Liam Swan</u>)





- 14. Submission from Lucan resident and Principal of Adamstown Castle ETNS advises that services need to be time bound with a commitment from SDCC to provide community facilities and not phased in accordance with private funding. It is also advised that public transport such as rail needs to be in place before development begins. (DraftClonSDZ0313, Tom Moriarty)
- 15. Prior to development on lands accessed via Griffeen Avenue, works should be required to improve traffic management and flow in the bottleneck area between the Griffeen Road & Grangecastle Road junctions, including provision of two lanes along the entire length of road from the Griffeen Road roundabout to the Grangecastle Road signals; including the full recessing of bus-stops on both sides of the road. (DraftClonSDZ0204, William Lavelle)
- 16. Prior to development on lands accessed via or onto Newcastle Road, works should be required to improve traffic management and flow in the bottleneck area between the SuperValu roundabout and N4. (<u>DraftClonSDZ0204, William Lavelle</u>)
- 18. A phasing requirement should be included to require a set number of additional bus departures to be provided for each phase of development. (<u>DraftClonSDZ0204, William Lavelle</u>)
- 19. Public transport should be put in place first, including the Luas, which should be extended to Lucan. (DraftClonSDZ0156, John Kelly)
- 20. Community facilities including green areas and playing pitches for the public and schools should be provided first. (<u>DraftClonSDZ0156</u>, <u>John Kelly</u>)
- 21. An appropriate cap should be placed on residential development prior to the opening of the DART underground and Luas to Lucan. The quantum of residential development permitted in advance of these infrastructural developments should be based on the level of commuter carrying capacity available. (DraftClonSDZ0204, William Lavelle)
- 22. No residential development should be permitted until Kishoge rail station is opened and operational. (<u>DraftClonSDZ0204</u>, <u>William Lavelle</u>)
- 23. The matrix for each phase of development should include a clear statement indicating the number of estimated additional private car and public transport journeys to be generated by development in that phase; along with details on how this additional journeys are to be met. (DraftClonSDZ0204, William Lavelle)
- 25. Provide future proofed transport infrastructure including roads, rail, Luas planning and cycle lanes to support this development before it is fully planned. (DraftClonSDZ0269, Shane Roche)
- 26. Submission on behalf of landowner (Cairn Homes PLC) raises concern in relation to requirement for the construction of the retail core that is outside their control being linked to the construction of residential units (25% per 1,000 units). It is advised that landowners that are inactive should not be allowed to halt progress and requested that this requirement be removed. It is submitted that absolute phasing thresholds should only be included where they are essential and not desirable, arbitrary, unnecessary or premature. It is also requested that a statement be included in the Planning Scheme that allows discretion to set aside phasing requirements. (DraftClonSDZ0351, Cairn Homes Plc, Cairn Homes)
- 27. Lucan resident suggests that the opening of Kishoge Train Station should be part of Phase One. (<u>DraftClonSDZ0353</u>, <u>Stephen O' Rafferty</u>)
- 28. Submission from Adamstown resident highlights concerns in relation to the absence of infrastructure (transport, community, schools, and youth facilities) for the first 1,000 units





- and failure to take the community, school and childhood need of the first 1,000 houses into consideration. Concern is also raised in relation to the lack of community, childcare and health uses for units 1,000 to 2,000 and the need for such units to be occupied as part of the phasing requirement. (<u>DraftClonSDZ0357</u>, <u>Meena BASKARASUBRAMANIAN</u>)
- 29. Lucan resident objects to planning scheme on the basis of reduction in public transport commitments compared to previous SDZ (Metro West and DART underground) and reliance on car. It is suggested that the Draft SDZ be amended to strengthen the link between the phasing of development and public transport including DART underground. It is stated that the phasing of development against the opening of Kishoge is inadequate and that this should occur on Phase 1 with further phases linked to the frequently of trains. It is also submitted that the upgrading of junctions such as that between Balgaddy Road and the Outer Ring Road should be included in Phase 1. (DraftClonSDZ0412, Darragh Mac Fiaich)
- 30. Submission from NAMA noted that the phasing in the development of the Clonburris Retail Core will be problematic to implement. The provision of 25% of a retail core is not feasible from a construction, funding, operating or occupancy viewpoint. It is suggested that the wording be changed to 'prior to the occupancy of 6,000 units, construction must have commenced on the retail core'. This centre needs to be provided as a single construction exercise and the suggested approach would be in accordance with the Retail Study accompanying the plan. (DraftClonSDZ0350, Deirote O'Connor National Asset Management Agency, NAMA)
- 31. Submission from NAMA suggests that the Phase 1A requirement for Retail Core
 Development and the Phase 1B (1,001 2,000 homes) requirement for planning permission
 for the Clonburris Retail Core be moved to Phase 3. (<u>DraftClonSDZ0350, Deirdre O'Connor National Asset Management Agency, NAMA</u>)
- 32. Submission from NAMA supports the requirement for a strategic SDZ wide strategy prior to commencement for the provision of common infrastructure, in particular water services, surface water drainage and open space. (DraftClonSDZ0350, Deirdre O'Connor National Asset Management Agency, NAMA)
- 33. Joint submission from local representatives highlights concerns in relation to the phasing of services (community, public transport, and infrastructure) and retail provision with development including additional bus routes. Concerns are also raised in relation to the lack of location based phasing for residential units. It is requested that a detailed phasing programme be set out for every 1,000 homes. It is also requested that transport services be linked to key development milestones and a key commitment be provided in relation to the opening of Kishoge Station. It is also requested that strategic roads (R120, Outer Ring Road and Fonthill Road) be upgraded in advance of construction or that these be phased together with wider road proposals contained in the Transport Assessment and Strategy. It is also requested that play spaces and sports fields be phased in accordance with population growth. (DraftClonSDZ0419, Cllr. Emer Higgins, Cllr. Vicki Casserly & Cllr. Kenneth Egan)
- 34. Submission considers the immediate opening of the Kishogue Railway Station as a necessary action to ensure this community is adequately served by rail transport (DraftClonSDZ0368, Frances Fitzgerald.TD)
- 35. Submission outlines concerns at the early phasing and submits that there are no provisions in infrastructure (transport wise, community services wise, school wise etc., etc.,) for the first 1000 occupied units. The phasing structure proposed is done without any forethought on how the first occupants are going to commute to work, attend school or where they would play their sport. Submission outlines that in the second bandwidth 1001 2000 occupied units, there is no guaranteed provision of community facilities no provision of a community centre or sports facility, neither there is a guarantee for provision for school. (DraftClonSDZ0361, Olag Sivanantham, Adamstown Cricket Club)





- 36. Submission outlines that the bandwidth of 1000 occupied units proposed will suit the needs of developer of the land and not the people living there. (DraftClonSDZ0361, Olag Sivanantham, Adamstown Cricket Club)
- 37. For the Clonburris town to be sustainable, the facilities including sports and playgrounds need to be provided in tandem with the people moving in there. (DraftClonSDZ0361, Olag Sivanantham, Adamstown Cricket Club)
- 38. Disappointment is expressed with regard to the planned opening of the Kishogue rail station in Phase Two. Existing public transport cannot accommodate additional commuters. Dublin Bus services are full at peak times. (DraftClonSDZ0224, Valerie Mcneill)
- 39. Cross-city public transport networks need to be in situ from early on and tightly tied into phasing including bus and rail provision. (DraftClonSDZ0332, Paul Gogarty)
- 40. There needs to be an orbital bus route on the Fonthill Road and the Outer Ring Road linking various parts of Lucan, Clondalkin and Tallaght before more than 500 houses are built on the site. (DraftClonSDZ0332, Paul Gogarty)
- 41. The provision of a Luas for Lucan, while not adding hugely in terms of capacity, should also be referenced as an additional requirement because 2023 traffic projections already have adjacent arterial routes at gridlock and even a small amount of additional car-based traffic in Clonburris will add to that. (<u>DraftClonSDZ0332</u>, <u>Paul Gogarty</u>)
- 42. The Department of Culture, Heritage and the Gaeltacht submission welcomes that a Parks and Landscape Strategy will be prepared by all developers which will be agreed with SDCC. It will be prepared by a qualified landscape architect in conjunction with a suitably qualified ecologist, and it will include a biodiversity management plan for habitats and particularly for the retention and management of hedgerows (page 79). The proposed SUDS measures will also provide biodiversity opportunities and will be included in the plan. (DraftClonSDZ0300, Manager Dau, Dept. of Arts, Heritage and the Gaeltacht)
- 43. Submission on behalf of Everglade Properties Ltd (in receivership) requests that much greater flexibility is incorporated in the phasing strategy to provide for the delivery of larger scale retail elements after 6,000 residential units have been provided. (DraftClonSDZ0343, Everglade Properties Limited (In Receivership)) Everglade Properties Limited (In Receivership))
- 44. Submission on behalf of Everglade Properties Ltd (in receivership) considers that there should be maximum flexibility to ensure the timely development and build out of the lands relating to the Draft Planning Scheme. It is important that the phasing strategy does not act as a barrier to the managed development of the lands. (DraftClonSDZ0343, Everglade Properties Limited (In Receivership), Everglade Properties Limited (In Receivership))
- 45. Submission on behalf of Everglade Properties Ltd (in receivership) submits that the delivery of housing units in a primarily residential SDZ area should not be linked to the delivery of employment floorspace through the Place Making Requirements as this is likely to delay or prevent the timely delivery of much needed housing. (DraftClonSDZ0343, Everglade Properties Limited (In Receivership), Everglade Properties Limited (In Receivership))
- 46. Submission on behalf of Everglade Properties Ltd (in receivership) requests the removal of the requirement to deliver commercial space such as retail and employment space as part of the phasing so as not to create a barrier to the delivery of much needed housing (DraftClonSDZ0343, Everglade Properties Limited (In Receivership) Everglade Properties Limited (In Receivership))
- 47. The phasing strategy set out in the Planning Scheme does not appear to have had regard to the retail phasing advice in the Retail Study which identifies that retail of a larger scale, such as required in Clonburris Urban Centre S1, would require a critical mass of population to be in place (i.e. 6000 units) to be viable. It is also noted that the provision of 25% of the retail





provision with each 1000 units is not practical, i.e. it is not feasible to provide 25% of a shopping centre/district centre at a time. (<u>DraftClonSDZ0343</u>, <u>Everglade Properties Limited</u> (<u>In Receivership</u>) <u>Everglade Properties</u> <u>Limited</u> (<u>In Receivership</u>), <u>Everglade Properties</u> <u>Limited</u> (<u>In Receivership</u>))

- 48. Submission requests the following changes to the Phasing:
 - Kishoge Train Station open prior to commencement of development
 - Provision in Phase 1A and 1B for public transport infrastructure, most notably orbital bus routes and a north-west Luas link
 - Include early upgrading of existing link street and arterial streets
 - Childcare spaces availability brought forward from Phase 2 to Phase 1B
 - Phase 1 to include construction of district centre
 - Phase 1B to include a community facility including but not limited to a library, civic centre, meeting area, youth café.
 - (DraftClonSDZ0502, Ed O'Brien & John Curran TD, Fianna Fail Dublin Mid West)
- 49. Submission requests that the key public transport projects, planned under the NTA's Transport Strategy for the GDA, are committed to by Government before commencement. (DraftClonSDZ0502, Ed O'Brien & John Curran TD, Fianna Fail Dublin Mid West)
- 51. The 'Roll Over' mechanism mentioned on p. 140 should be removed. No further units should be constructed unless all requirements of the previous phase has been met. (DraftClonSDZ0308, Madeleine Johansson, People Before Profit)
- 52. The provision of community floor space, the commencement of works at Griffeen Valley Park Extension or Barony Park, to make available a school site for the Department of Education and the availability of childcare spaces should all be moved from Phase 1B to Phase 1A. This would help avoid developers building smaller numbers and encourage them to build larger numbers of units in conjunction with the required facilities. (DraftClonSDZ0308, Madeleine Johansson, People Before Profit)
- 53. Many existing community centres in the surrounding area are already operating to full capacity, so it is crucial that new facilities are built in conjunction with the new housing units. (<u>DraftClonSDZ0308</u>, <u>Madeleine Johansson</u>, <u>People Before Profit</u>)
- 54. The Canoeing Ireland submission states that the draft scheme provides for a design in accordance with the overall Parks and Landscape Strategy for the Planning Scheme to be submitted to and agreed in writing with SDCC at planning application stage to include active and passive recreational facilities with ancillary lighting, parking and pavilion buildings. (DraftClonSDZ0325, Paddy Boyd, Canoeing Ireland)
- 55. Submission on behalf of Clear Real Estate Investments PLC requests amendments to Table 4.3 to include 'including appropriate interim solutions' in the Water and Wastewater plans requirement prior to commencement. (DraftClonSDZ0329, Stephen Little, Clear Real Estate Investments PLC)
- 56. The intention to open Kishoge Train Station early in the phasing programme is welcomed. It is requested that the opening of the station is a high priority as this would facilitate the early development of the Kishoge area and lead to the provision of much need housing units. (DraftClonSDZ0508, The Heapes Family, The Heapes Family)
- 57. Concern raised in relation to proposals to develop the planned low density housing at the Clonburris end in the first phase without providing additional services and facilities in the area. Services and community facilities need to be developed at the same time as the homes and should opened prior to the occupation of the homes. (DraftClonSDZ0505, Paula Kelly)





- 58. Concern in relation to the lack of phased infrastructure tied into construction milestones within the SDZ. (<u>DraftClonSDZ0537</u>, <u>John Vaughan DraftClonSDZ0536</u>, <u>Michael Jennings DraftClonSDZ0531</u>, <u>Adrienne O'Driscoll DraftClonSDZ0532</u>, <u>Ciaran O'Driscoll DraftClonSDZ0530</u>, <u>Kay Vaughan DraftClonSDZ0533</u>, <u>Marie Tweedy DraftClonSDZ0534</u>, <u>Shay Keogh</u>)
- 59. Submission concerned about the lack of Phased infrastructure in construction milestones within the SDZ (<u>DraftClonSDZ0559</u>, <u>Brian McKenna</u> <u>DraftClonSDZ0565</u>, <u>Jennifer McKenna</u>)
- 60. Submission questions if services such as schools, medical facilities and additional transport will be in place prior to occupation. (<u>DraftClonSDZ0560</u>, <u>Sandra McLoughlin</u> <u>DraftClonSDZ0561</u>, <u>Tara Jenkins DraftClonSDZ0562</u>, <u>John McLoughlin DraftClonSDZ0563</u>, <u>Tracey Boland DraftClonSDZ0602</u>, <u>Catherine Scanlon DraftClonSDZ0603</u>, <u>Vincent Scanlon</u>)
- 61. With regard to phasing and implementation there is no provision for infrastructure (transport, community services, schools etc.) for the first 1,000 occupied units (i.e. nearly 2,000 more adults + 2,000 more children if an average household of 2 adults + 2 children is assumed). It is considered that the phasing is developer focused and not community focused. (DraftClonSDZ0381, Brian Murray)
- 62. The Kishogue train station should ideally be opened at an early stage of development to act as an attractor for residents and businesses. (DraftClonSDZ0382, Paul Corcoran, Dublin Cycling Campaign)
- 63. Sinn Fein submission states that key to the success of the SDZ is making the residential development explicitly tied to the development of the social and economic infrastructure and amenities. The current phasing proposals contained in Section 4.3 of the Draft Planning Scheme is not sufficiently robust to ensure adequate phasing occurs. (DraftClonSDZ0383, Eoin Ó Broin TD, Cllr Danny O'Brien & Cllr Mark Ward)
- 64. There are no provisions in infrastructure (transport, community services, school etc.) for the first 1,000 occupied units (i.e. nearly 2,000 more adults + 2,000 more children, using an average household of 2 adults + 2 children). It is considered that phasing is developer focused rather that community focused. (<u>DraftClonSDZ0386</u>, <u>Kinga Drozdz</u>)

Chief Executive's Response

The Chief Executive acknowledges the submissions received in relation to the phasing of the delivery of the Planning Scheme. Section 4 of the Draft Planning Scheme details the Phasing Programme for the development of the lands. The Phasing Programme aims to provide a balanced delivery of infrastructure, urban centres and community services in tandem with population increase through a logical flexible schedule.

The Chief Executive's responses to the phasing issues are categorised under the following headings:

- Kishoge Railway Station
- Phasing of Public Transport Infrastructure
- Phasing of Road Infrastructure
- School Phasing
- Place Making Requirements

Kishoge Railway Station

A number of submissions have requested bringing forward infrastructure listed in the Phasing Table to earlier phases, including a number of submissions making specific reference to the opening of Kishoge Railway Station. It should be noted that Section 4.7 outlines that any required works may be brought forward and completed sooner than scheduled in the Phasing Programme. Kishoge Railway Station has a constructed platform and station however, the station is not operational at present. It is recognised that the operation of the Kishoge Railway Station is critical to delivering the vision, the





projected transport modal share and a sustainable community. The railway station is fully integrated into the density, land use, urban centre hierarchy and street network in the Draft Planning Scheme. The NTA has indicated that the Kishoge Railway Station will be opened as soon as it is clear that there will be sufficient passenger demand. In this context and noting that the station requires some works to reopen, the Chief Executive considers that the opening of the railway station as part of Phase 1B is a balanced provision to support critical mass for the railway station and allow time for the works to be carried out. There is an inconsistency between Table 4.3 Phasing Table and Table 4.6 Local Level Requirements Table. It is recommended that Table 4.6 be amended to state Phase 1B in place of Phase 2 for the Kishoge Railway Station phasing.

Phasing of Public Transport Infrastructure

A number of submissions request linking of various transport infrastructure, predominantly individual planned public transport projects, and the delivery of residential units through phasing. The relevant national transport policy for the area is planned through the NTA Greater Dublin Area Transport Strategy 2016 - 2035 and planned projects such as the Orbital Bus from Tallaght to Blanchardstown; DART Underground; DART Expansion to Hazelhatch; Upgrade of Radial Bus Services on the N4 and N7; and Luas to Lucan will benefit the wide catchment of Clondalkin, Lucan, Tallaght, Blanchardstown and north east Kildare area. It is estimated that the Draft Planning Scheme represents a population growth of circa 20,000 people over the medium term to the wider catchment with an estimated existing population of over 150,000. Further to concerns raised in submissions in relation to committing to the planned public transport proposals, a submission from the NTA on the Draft Planning Scheme confirms that the NTA is committed to delivering the planned public transport infrastructure in the area.

The Draft Planning Scheme does not include for phasing of development in the Planning Scheme to tie in with future public transport infrastructure delivery. The rationale for this approach is set out under the following headings;

- a). Context of SDZ Lands,
- b). Role of Planned Public Transport,
- c). Density,
- d). Adamstown Precedent, and
- e). Traffic and Transport Assessments (TTA)

a). Context of SDZ Lands

The SDZ designation at Clonburris is an indicator of the national and regional importance of the site for housing supply and is largely based on the location of the lands adjoining the Kildare Railway Line. It is the view of the Planning Authority that any phasing of the delivery of development should be linked to the accessibility of residents to the Kildare Railway Line to achieve sustainable development. The time between the original designation of the Clonburris SDZ and the current Draft Planning Scheme has seen the delivery of the key public transport infrastructure for the SDZ; the construction of two railway stations. The Planning Authority is satisfied that the opening of Kishoge Railway station is required to be phased.

The Core Strategy of the County Development Plan 2016-2022 provides for a total housing capacity of 41,143 units in South Dublin County. That figure is derived from providing an appropriate density in accordance with the Sustainable Residential Development in Urban Areas Guidelines to the zoned lands of the County. The density assigned takes account of the existing public transport infrastructure in the area. Of the 41,143 unit capacity in the CDP, Clonburris accounts for 8,000 units. It is noteworthy that the remaining circa 32,000 units are not linked to the delivery of planned strategic public transport infrastructure.





The requirement of the delivery of further strategic public transport infrastructure to enable construction of housing would be inconsistent with the approach to the remaining circa 32,000 unit capacity in the County and would provide a restriction and an uncompetitive scenario for an accessible and appropriate development site in the County. The Planning Authority considers that the SDZ designation should enable the lands to be equal to or have an advantage over the other residentially zoned lands in the County in terms of economic viability. The MUHDS designation and the LIHAF allocation are indicative of the Active Land Management measures from the Department that are increasing the economic viability and competitiveness of the Clonburris and Adamstown SDZ.

b). Role of Public Transport in the Planning Scheme

The Draft Planning Scheme is supported by two constructed railway stations within the SDZ boundary. The provision of the Orbital Bus route and the DART Expansion, although desirable for the enhancement of public transport facilities directly serving Clonburris in the medium and long term, are of such a scale in capacity terms that the development of Clonburris is not dependent on their completion.

The mix and location of land uses in the Draft Planning Scheme, access to two railway stations serving the key trip demand to Dublin City and the permeability of the masterplan are the primary components influencing the trip generation and mode split projections. The SDZ lands are strategically located within the Metropolitan Area of Dublin City, adjoining the residential communities of Lucan and Clondalkin. The SDZ lands are considered to be relatively well served by existing public transport infrastructure, including two railway stations constructed relatively recently to accommodate the Strategic Development Zone (SDZ). Improvements in public transport infrastructure for the wider Lucan and Clondalkin area are supported in national transport policy through the NTA Greater Dublin Area Transport Strategy 2016 - 2035 and related works and facilities. Projects, such as the Orbital Bus from Tallaght to Blanchardstown; DART Underground; DART Expansion to Hazelhatch; Upgrade of Radial Bus Services on the N4 and N7; and Luas to Lucan will enhance the public transport options of the wider area.

c). Density

The quantum of development in the Draft Planning Scheme is based on the existing public transport infrastructure serving the area. The quantum of permissible residential units in the Draft Planning Scheme is largely derived from the application of appropriate density on the subject lands. The density is derived based on the Sustainable Residential Development in Urban Areas Guidelines and is primarily based on the distance from the existing public transport nodes at Kishoge and Fonthill railway station and taking account of the existing bus services.

d). Adamstown Precedent

It is noted that there is a precedent in terms of the provision of strategic public transport infrastructure in the phasing programme of a Planning Scheme. During the amendment for the Adamstown Planning Scheme, the An Bord Pleanála decision overturned the decision of the Elected Members of SDCC to include the delivery of the Phoenix Park Tunnel Link no later than Phase 5 of the Planning Scheme. The ABP decision provided the following text into the Planning Scheme in place of the Phasing requirement:

'The Scheme is supported by the key objectives of national rail investment policy including the development of the "Phoenix Park Tunnel Link" and the "Dart Underground" and related works and facilities. These projects, although desirable for the enhancement of public transport facilities, linkages and services at Adamstown in the medium and long term, are of such a scale in capacity terms that the development of Adamstown is not dependent on their completion.'





e). Traffic and Transport Assessments (TTA)

The Chief Executive considers that the provision for TTAs in the Draft Planning Scheme provides access to further assessment of the transport impacts of proposed developments at application stage and provides a safeguard on the interim impacts on existing transport infrastructure pending delivery of strategic transport infrastructure for the wider area.

It is noteworthy that Section 2.2.7 of the Draft Planning Scheme outlines that the need for Transport and Traffic Assessments (TTAs) will be considered on a case by case basis for developments that have the potential to generate a significant increase in trips on the overall transport network; having regard to the National Transport Authority (NTA) Traffic Management Guidelines (2003) and the NRA Traffic and Transport Assessment Guidelines (2014). The TTAs will generally be required to address wider public transport, walking and cycling network issues, rather than singularly focusing on impacts on the immediate street network. Such assessments should demonstrate that there is sufficient public transport, pedestrian, cyclist and road capacity to serve the development.

f). Summary

The Chief Executive outlines that the Lucan and Clondalkin area will benefit from the planned future public transport and the Draft Planning Scheme does not phase development in the Clonburris SDZ with the delivery of planned public transport for the following reasons:

- The main public transport infrastructure serving the Planning Scheme are the two railways stations that allow access to the Kildare Railway route. It is noted that location of the lands adjacent to the railway is the primary rationale for the designation of the SDZ (2 train stations delivered). The Phasing in the Planning Scheme includes the opening of the Kishoge Railway Station.
- Phasing additional public transport provision would be uncompetitive and inconsistent in relation to other zoned lands in the County/ GDA.
- Quantum of development in the Draft Planning Scheme is based on density ranges. The density ranges are derived having regard to the existing public transport infrastructure.
- The precedent of the Adamstown ABP decision to remove the Phoenix Park Tunnel Link works from the phasing.
- Traffic and Transport Assessments (TTA) provides access to further assessment of the transport impacts of proposed developments at planning application stage and provides a safeguard on the interim impacts on existing transport infrastructure pending delivery of strategic transport infrastructure.

Phasing of Road Infrastructure

In terms of requests for wider road infrastructure improvements being phased with the delivery of development in the Planning Scheme, the Chief Executive considers that the Lucan and Clondalkin area is supported by a number of Roads and Streets objectives in the South Dublin County Council Development Plan 2016 – 2022. These projects form part of the SDCC Strategic Road and Street Network and as such, are included in the transport assessment of the Draft Planning Scheme. The projects, although desirable for the enhancement of transport linkages and services at Clonburris in the medium and long term, are designed to serve the wider area and the development of Clonburris is not dependent on their completion. The Planning Scheme and phasing includes for a hierarchical network of streets within the SDZ lands, including a number of junction upgrades and new junctions.

Since the mid-1990s, transport policy in the GDA has been directed towards reducing the growth in car travel and increasing the use of public transport, cycling and walking. Complementing this approach has been a policy of balancing the increase in road capacity for private cars. The basis for these policies is recognition that it is unrealistic and unsustainable to accommodate growth in travel





demand across the region through car based movement. The South Dublin County Council Development Plan 2016-2022 makes provision for a limited number of local projects that will improve the efficiency of the road network. The number of these projects is limited, as noted within the Development Plan as the creation of more road space to cater for traffic, particularly in existing areas, may serve to attract more cars to the network. Research carried out under "Strategic Development Zones: The Benefits of Integrated Land Use and Transport Planning" (NTA, 2017) suggests that when additional road capacity is provided in areas with growing traffic levels, this capacity tends to be taken up quite quickly with traffic congestion.

School Phasing

The Department of Education and Skills is responsible for the delivery of educational facilities and services. South Dublin County Council works with the Department of Education and Skills, 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 and South Dublin County Council will work under the MoU in relation to the identification and acquisition of school sites in Clonburris.

The submission from the Department of Education and Skills supports the provision of schools and outlines that the demographic of the emerging population in Clonburris will be monitored by the Department of Education and Skills on an ongoing basis. The Department uses GIS to monitor demographic growth and identify when the pressure for additional school places will arise. The system uses data from the CSO, Ordnance Survey Ireland, local authorities and the Department of Social Protection in addition to information from the Department's own databases. When the demographic assessments indicate that a new primary or post primary school is required, the Department will seek to proceed with the acquisition and development of an appropriate school site in order to provide the necessary accommodation. Similar to other works, the delivery of the school sites may be brought forward and completed sooner than scheduled in the phasing programme.

Place Making Requirements

A number of landowners have made submissions in relation to the Place Making requirements of the Phasing Programme. Concerns are raised regarding the linking of the construction of the core of the Urban Centres and the residential units. The construction of the centres at Clonburris and Kishoge are critical elements in achieving the vision of this Planning Scheme and providing a critical mass of facilities, amenities and services to enhance the quality of living for future and existing residents in the area. To ensure the development of the key urban centres in the Planning Scheme, the Chief Executive considers that residential units are required in the catchment of each of the Kishoge and Clonburris centres to be linked to the construction of the Retail Core of the relevant centre. The Draft Planning Scheme does not specify the sequencing of residential development across the Planning Scheme with a view to enabling development to commence. In the context of flexibility in spatial sequencing, the Chief Executive considers that the approach of requiring the main centres to be built in tandem with the residential units is proportionate and in the interests of place making, quality of life and sustainable transport patterns.

A few submissions have queried the relationship between the recommendations of the Retail Study and Place Making Requirements. The submissions outline that the provision of a minimum of 25% of the sub sector CUC-S1 in tandem with every 1,000 units is contrary to the recommendations of the Retail Study. Firstly, the Retail Study capacity assessment indicates that significant convenience retail provision will rely upon the expenditure generated by the resident population in Clonburris. As such, the viability of the retail provision will increase in tandem with population growth. Furthermore, the Planning Scheme provides for a target of 564 residential units, a minimum of 2,500 sqm of community floorspace, a minimum of 4,515 sqm of employment floorspace and a maximum of 12,920 sqm of retail floorspace in the Clonburris Retail Core area (CUC-S1). The assessment of 25% will be based on the blocks, urban grain,





public realm works and land uses and it is not mandatory to construct any retail floorspace in any one 25% segment of the centre.

In relation to concerns about the feasibility from a construction, funding, operating or occupancy viewpoint of building the centre in segments, the Chief Executive notes that the 25% is a minimum provision and can be exceeded or completed sooner than required.

The Chief Executive notes issues raised in relation to the flexibility of the phasing; requests are made for more flexibility and for less flexibility. The Chief Executive considers that the substitution clause and the roll over clause in Section 4.7 Operation of Phasing Programme offer sufficient and required flexibility in terms of the Phasing Table.

Chief Executive's Recommendation

It is recommended that Table 4.6 be amended to state Phase 1B in place of Phase 2 for the Kishoge Railway Station row and insert 1A for Phase 1:

Infrastructure	Development Area Restricted	Phase
Kishoge Railway Station	This phasing requirement is only	1 & 2
Required Actions:	applicable to the development	1A & 1B
Agree timeframe for opening in	within the Kishoge catchment,	
Phase 1A	namely Kishoge Urban Centre,	
Railway Station opening in Phase	Kishoge South East, Kishoge	
2 -1B	South West, Kishoge North West	
	& Kishoge North East	
	Development Areas.	

Strategic Environmental Assessment of Chief Executive's Recommendation

No interaction with Strategic Environmental Objectives.

Appropriate Assessment Screening of Chief Executive's Recommendation

No significant adverse impacts on European sites within the SDZ's zone of influence are predicted.

Clonburris



4.10 Funding and Implementation

- Submission from CIE suggests that the potential for establishing a Section 49 contribution scheme be discussed between the Local Authority and the NTA as a means of providing funding for the DART Expansion Scheme. (<u>DraftClonSDZ0295</u>, <u>Aidan Ruane</u>, <u>CIE Group</u> <u>Property Management DraftClonSDZ0346</u>, <u>Aidan Ruane</u>, <u>CIE Group Property Management</u>)
- NAMA submission suggests that the adopted Planning Scheme articulates the precise role of the Development Agency. (<u>DraftClonSDZ0350</u>, <u>Deirdre O'Connor National Asset</u> Management Agency, NAMA)
- NAMA submission outlines that the Development Agency needs to be pro active in securing further funding under the Local Infrastructure Housing Activation Fund (LIHAF). (DraftClonSDZ0350, Deirdre O'Connor National Asset Management Agency, NAMA)
- 4. Submission from NAMA outlines the importance of the Development Agency to securing the implementation of the Planning Scheme. In terms of implementation, submission outlines that it is considered necessary that a bespoke development contribution scheme is established that ring fences the money collected for infrastructure in the SDZ area to provide clarity and certainty to secure development funding. (<u>DraftClonSDZ0350</u>, <u>Deirdre O'Connor National Asset Management Agency</u>, NAMA)
- 5. Submission on behalf of Everglade Properties Ltd (in receivership) suggests that a structure and more specifics are provided for the Development Agency which sets a clear objective for obtaining funding for the delivery of infrastructure, community facilities and major open space areas. (DraftClonSDZ0343, Everglade Properties Limited (In Receivership) Everglade Properties Limited (In Receivership))
- 6. Submission on behalf of Everglade Properties Ltd (in receivership) submits that a review of the current Section 48 Scheme to include for necessary infrastructure required set out in the Draft Planning Scheme or provision of a Section 48 Scheme solely for the SDZ area. (DraftClonSDZ0343, Everglade Properties Limited (In Receivership) Everglade Properties Limited (In Receivership))
- 7. One of the key concerns in relation to the SDZ is the cost of infrastructure which is required for development at Clonburris. The concept of the Local Authority undertaking infrastructural works and recovering the cost by way of a special levy has not been accepted. Instead it is proposed that the landowners within the SDZ divide the cost of infrastructure amongst themselves. (DraftClonSDZ0335, Dietacaron, Di
- 8. It appears inequitable that developers should have to bear the cost of infrastructure for a proposed affordable residential development when a similar development scheme (Poolbeg West) is to receive extensive funding for infrastructure. In a situation where the accumulated costs make development uneconomical, development will not happen and the objectives of the SDZ will not be realised. (DraftClonSDZ0335, Dietacaron, Dietacaron)
- 9. The Development Agency must advocate that a level playing pitch is required to ensure progress with the Scheme central funding is required for all strategic infrastructure, including rail, bridges, roads, drainage etc. (<u>DraftClonSDZ0335</u>, <u>Dietacaron Dietacaron</u>, <u>Dietacaron</u>)
- 10. The entire SDZ Planning Scheme should be subject to regular and ongoing viability checks to ensure that the eventually approved scheme will facilitate early delivery of much needed residential development that can meet the market requirements without undue cost to the residents in the new community. 'Kick-start' principles, taking into account density, deliverability and use of existing available infrastructure in the short-term should be a parameter for consideration in viability testing. (DraftClonSDZ0335, Dietacaron, Dietacaron)





- 11. In the context of determining cost of infrastructure, strategic open space and constructed regional surface water attenuation ponds should be calculated and an arrangement for equalisation of infrastructure costs should be incorporated into the scheme, unless such costs are entirely borne by the Development Agency/Government funding.

 (DraftClonSDZ0335, Dietacaron Dietacaron, Dietacaron, Dietacaron)
- 12. It is not clear whom will take responsibility for the construction of the wetlands, which will fulfil a regional function. It will have to be very clear that the constructed wetland will be paid for as strategic infrastructure. (DraftClonSDZ0335, Dietacaron, Dietacaron, Dietacaron, Dietacaron, Dietacaron, Dietacaron, Dietacaron, Dietacaron)
- 13. Focussed high-level engagement should be held between the Development Agency and the Government, directly and not via LIHAF or other schemes, to address the specific needs for infrastructure to open these lands for development. (<u>DraftClonSDZ0335</u>, <u>Dietacaron</u> <u>Dietacaron</u>, <u>Dietacaron</u>)
- 14. One of the greatest concerns regarding the SDZ is that the development of which is not solely within the control of SDCC and cooperation will be required from various local agencies, Government Departments and private developers. Members see the lack of services in Adamstown as evidence of the failure of certain inter-agencies in responding to residents needs in growing communities in particular Dublin fire and Rescue Services and larnród Éireann in supplying required services in the area. (DraftClonSDZ0504, South Dublin County PPN, South Dublin County Public Participation Network)
- 15. Sinn Fein submission states that the SDZ must include adequate provision of land for schools, community and sports facilities, play facilities, retail, employment and childcare. The SDZ should be accompanied by a capital programme indicating when specific facilities such as schools and community centres are to be built, where the funding is coming from and when the facilities will be provided. The Council should engage with existing sports clubs and associations, to ensure that all opportunities for improving sporting and community facilities are availed of. All Government Departments, agencies and public funded bodies who have responsibility for the provision of amenities and infrastructure should be required to submit information for this capital plan. (DraftClonSDZ0383, Eoin Ó Broin TD, Clir Danny O'Brien & Clir Mark Ward)
- 16. Submission recommends the preparation by the Agency of an Implementation Plan following the adoption of the Scheme that provides clarity around the delivery of infrastructure and a programme for agreeing elements that are common across the landholdings. (<u>DraftClonSDZ0350</u>, <u>Deirdre O'Connor National Asset Management Agency</u>, <u>NAMA</u>)

Chief Executive's Response

A number of submissions outline requests in relation to the role of the Development Agency, the funding of infrastructure and the general implementation of the Planning Scheme. The Chief Executive acknowledges the importance of the implementation of the Planning Scheme.

In Section 4.10, the Planning Scheme outlines that all measures and funding streams available for the release of funding to provide for the delivery of infrastructure and community facilities in Clonburris will be pursued in conjunction with landowners/ developers. To clarify the role of South Dublin County Council as the Development Agency, the following text is recommended to be inserted into Section 4.10.





Chief Executive's Recommendation

It is recommended that the following text be inserted in Section 4.10 Funding and Implementation:

4.10 Funding and Implementation

The development of the SDZ lands is subject to the SDCC Section 48 Development Contribution Scheme 2016-2022 and the Kildare Route Project Section 49 Contribution Scheme and any applicable superseding schemes.

The SDZ Order (S.I. No. 604 of 2015) states that the development agency specified for the purposes of section 168 of the Planning and Development Act 2000 (as amended) is South Dublin County Council. South Dublin County Council shall proactively manage and promote the integrated development of this Planning Scheme.

In some cases, the completion of works required to facilitate residential development in a phased manner within the Planning Scheme are outside the direct control of either SDCC, the SDZ landowners or the Development Agency. All measures and funding streams available for the release of funding to provide for the delivery of infrastructure and community facilities in Clonburris will be pursued in conjunction with landowners/ developers.

Strategic Environmental Assessment of Chief Executive's Recommendation

This additional text supports and strengthens proactive and integrated management of the planning scheme. Positive effects across SEOs.

Appropriate Assessment Screening of Chief Executive's Recommendation

No significant adverse impacts on European sites within the SDZ's zone of influence are predicted.





Strategic Environmental Assessment (SEA) Environmental Report (ER)

1. The Department of Culture, Heritage and the Gaeltacht submission states that the SEA addresses the issue of hedgerows under the heading of woodland habitats. While they are clearly shown on figure 12, they are not discussed in any detail in section 4.3.8. This is somewhat surprising since figure 12 would indicate that the majority of so called woodland habitat is in fact hedgerows. It is unclear therefore what importance the hedgerows have in terms of biodiversity and the Department would have expected a hedgerow survey to have been carried out. Section 7.10 would appear to indicate that such a survey has been carried out and has influenced the scheme, but, as stated above, the Department notes references to ecological surveys in 2015, 2016 and 2017 which have not been referred to this Department, and do not appear to be on the website www.clonburris.ie. Therefore the Departmental comments are made in the absence of this information.

Section 7.11 deals with in-combination and cumulative effects. Table 7.11.1 identifies potential cumulative effects from other plans and projects. However, the SEA has not considered cumulative impacts of the greenway, or other projects such as the Griffeen Valley cycleway extension, the development of the Grange Castle Business Park and the proposed re-construction of the R120 road bridge over the Grand Canal on the western edge of the SDZ under a part 8 scheme agreed by South Dublin County Council in 2012.

The Department welcomes the fact that the SEA was amended on foot of the submission of the National Parks and Wildlife Service (NPWS) of the Department at SEA scoping stage. In particular the Biodiversity Flora and Fauna environmental objective B1 was amended to include protected species outside of designated sites. However, while the target for SEO B1 includes species, the indicator only refers to habitats. Therefore the SEO indicator for SEO B1 needs to be amended to add species.

It is noted that in section 4.3.3 it is stated that virtually all birds are protected in Ireland. In fact all wild birds are protected under the Wildlife Acts 1976-2012, although some have an open season under the Wildlife Acts allowing them to be hunted. This should be corrected.

The reference to the National Biodiversity Plan should be amended to reflect the new plan recently released for 2017-2021.

The SEA documentation needs to be checked and, where necessary, edited to ensure the setback from the boundary of the Grand Canal pNHA is correctly quoted as on page 37 of the Draft Planning Scheme. In some places it is simply referred to as the setback from the Grand Canal, as opposed to from the Grand Canal pNHA boundary, one such example is the 5th bullet point on page 98 and on page 154.

(DraftClonSDZ0300, Manager Dau, Dept. of Arts, Heritage and the Gaeltacht)

Chief Executive's Response

Woodland habitats

The Ecological Surveys of 2015 included hedgerow and ditch surveys; these were carried in August/September based on the methodology presented in "Hedgerow Appraisal System – best practice guidance on hedgerow surveying, data collation and appraisal" (Foulkes et al 2013). It is recommended that these surveys be made available to interested parties including NPWS.

Clonburris



Ecology Surveys

The submission notes that the ecological surveys 2015, 2016 and 2017 referred to in the SEA report were not referred to the NWPS. The ecological surveys were carried out to inform the preparation of the Draft Planning Scheme and the SEA. The results of the surveys are incorporated into the SEA. The surveys can be made available to the NWPS.

Birds

Section 4.4.3 of the SEA ER will be amended to reflect the statement that all wild birds are protected under the Wildlife Acts 1976-2012

Cumulative effects

Section 7.11 of the SEA ER will be amended to include additional projects and proposals as outlined in the NPWS submission.

Strategic Environmental Objective (SEO) B1

SEO B1 was amended to include species, and for consistency the SEO indicator for SEO B1 needs to be amended also to add species. This will be included in the updated SEA ER.

National Biodiversity Plan

The new National Biodiversity Plan will be included in Chapter Three of the SEA ER.

Reference to the proposed Natural Heritage

Noted, the SEA ER will be updated to reflect the correct term of proposed Natural Heritage Area (pNHA) of the Grand Canal.

Archaeological and Architectural Heritage

The details of the submission are noted including comments supporting the Archaeological and Architectural Heritage Inventory and the set back from the Grand Canal pNHA.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.

The Ecological Surveys of 2015, 2016 and 2017 are attached in Appendix E of this Report.

Chief Executive's Recommendation

It is recommended that the Strategic Environmental Assessment Environmental Report will be amended as follows;

1. Section 4.4.3 of the SEA ER will be amended as follows

The protected, rare and/or sensitive species recorded within the 3 tetrads surrounding the proposed SDZ Planning Scheme are outlined in Table 6. As virtually all All wild birds are protected in Ireland, only records for amber and red listed species are detailed in Table 7. A comment on the likelihood of each of these species occurring within the SDZ Planning Scheme is provided in the table below. Note the likelihood of presence is based upon the habitat occurring within the SDZ lands.





2. Section 7.11 of the SEA ER will be amended as follows:

Additional cumulative impact assessment of projects particularly those identified by the NPWS in their submission, i.e.: The Grand Canal Greenway, Griffeen Valley cycleway extension, the development of the Grange Castle Business Park and the proposed re-construction of the R120 road bridge over the Grand Canal on the western edge of the SDZ under a part 8 scheme agreed by South Dublin County Council in 2012.

3. Table 20 Monitoring Measures to be amended as follows

Biodiversity	B1:To avoid loss	B1: Percentage of	B1: No losses of	Designated
Flora and Fauna	of habitats,	relevant habitats	relevant habitats,	ecological sites
	geological	and species lost	species or their	mapping, CORINE
	features, species	as a result of	sustaining	Mapping,
	or their	implementation	resources in	National Parks
	sustaining	of the Planning	designated	and Wildlife
	resources in and	Scheme	ecological sites as	Service Records
	outside of		a result of	& Development
	17designated		implementation	Management
	and ecological		of the SDZ	Process in SDCC.
	sites		Planning Scheme	

4. Section 3.2.2 to be amended as follows

National Biodiversity Plan (2011-2016) National Biodiversity Plan (2017-2021)

5. Amend Section 4.12 Likely evolution of the environment in the absence of the Planning Scheme

Biodiversity, flora and fauna: The provision of appropriate buffer zones particularly around the watercourses would likely be the minimum of 30m; however the new, Planning Scheme provides for a 50m set-back for all buildings from the northern side of the pNHA boundary **Grand Canal**, to afford the optimal degree of protection to the Grand Canal ecological corridor. Additional measures have been incorporated through the SEA process as regards maintaining the integrity of the riparian habitats associated with the Canal and other watercourses.

6. Amend page 154 of the SEA as follows

Grand Canal ecological corridor

The corridor will form a key element of the proposed Barony Park to the north and the Grand Canal Park to the south. It is an objective of the scheme to enhance the biodiversity and ecological character of the proposed Natural Heritage Area. Developments fronting onto the **Grand** Canal (pNHA) shall facilitate the continuity of the ecological corridor through the planting of native tree and hedgerow species and the managed access to the northern towpath.

All buildings shall be set back 50m from the pNHA boundary Canal and development (with the exception of footpaths and bridges which shall be set 30m from the Grand Canal). Development proposals along the Grand Canal Corridor shall be accompanied by ecological impact assessments undertaken by an appropriately qualified and experienced ecologist and in line with CIEEM guidelines (2016).









Appropriate Assessment Screening Report

The Department of Culture, Heritage and the Gaeltacht submission states that Poolbeg
waste water treatment plant (WWTP) is currently overloaded and was non-compliant in
2016, and that it is currently awaiting an upgrade to allow for a greater population. It is
unclear what will happen to the proposed development at Clonburris should the upgrade
not be ready in time, particularly given the number of other proposed developments which
will also utilise this WWTP and the potential cumulative impact. This issue needs to be
clarified.

It is also noted that in Section 4 it is stated that the connection between the SDZ lands and Dublin Bay is via the Griffeen and Camac rivers. The Grand Canal has been omitted and should be inserted here.

(DraftClonSDZ0300, Manager Dau, Dept. of Arts, Heritage and the Gaeltacht)

Chief Executive's Response

In relation to the Poolbeg Waste Water Treatment Plant (WWTP), it should be noted that while the Wastewater Treatment will serve the SDZ, it is controlled, managed and maintained by Irish Water. In addition, Irish Water are aware that the SDZ is of social and economic importance to the State. As such, they have confirmed that upgrade works are planned to proceed in stages to deliver a compliant effluent, at projected increased loads, with the full capacity of 2.4 m population equivalent completed by 2023. There are also plans to construct a new WWTW to the north of Dublin City which will permit flows to be diverted from the Ringsend catchment, thus ensuring that the capacity of Ringsend will be adequate to cater for growth in that catchment well into the future.

The AA Screening report also states that the 2016 Annual Environmental Report for the WWTP concluded that the assessments carried out on water quality in transitional and coastal waterbodies did not indicate a significant impact from the specific pollutants listed on the receiving waters outside the near field of the SW1 discharge point. The proposed upgrades will omit the requirement for this long sea outfall tunnel (LSOT) by installing an aerobic granular sludge (AGS) technology in both the capacity upgrade and in the existing treatment tanks. These measures will therefore reduce the risk of pollution to receiving waters.

The reference to the Grand Canal in Section 4 is noted and will be included.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.

Chief Executive's Recommendation

It is recommended that the AA Screening Report be amended as follows:

 Amend Section 4 Examination of Risk of Likely Significant Effects of Implementing the Draft Scheme

The connection between the SDZ lands and Dublin Bay via the Griffeen and Camac rivers and Grand Canal, the water chemistry of which could be affected by activities in the SDZ lands;

2. Insert

Section 5: Assessment of Proposed Amendments to the Clonburris SDZ Draft Planning Scheme

Clonburris



Following the period of public display and the Chief Executive's Report on submissions and observations received in respect of the Clonburris SDZ Draft Planning Scheme, a number of amendments were recommended by the Chief Executive in the CE Report.

The proposed amendments comprised minor changes to the existing text in both tables and contextual paragraphs, revisions to an existing figure, reduction of the net area of the Canal Extension Development Area, an increase in the gross retail area for Clonburris South West, Clonburris North West, Kishoge South West and Kishoge South East development areas and changes to the permitted building height for the Clonburris South East area (Table 3.3.2).

These proposed amendments were screened for their potential to have likely significant effects on European sites. None of the proposed revisions were deemed to pose any likelihood of significant effects on European sites for the following reasons:

- The proposed revisions are benign in nature.
- There were no impact pathways or cause effect linkages arising from the proposed revisions; and;
- Environmental issues were sufficiently addressed through existing protective policies and objectives contained within the existing County Development Plan (See Appendix B).





Accompanying Documents

Archaeological and Architectural Heritage Inventory

 The Department of Culture, Heritage and the Gaeltacht agrees with the Architectural Heritage Summary and Conclusions of the Archaeological and Architectural Heritage Inventory (September 2017) document. (<u>DraftClonSDZ0300</u>, <u>Manager Dau</u>, <u>Dept. of Arts</u>, Heritage and the Gaeltacht)

Chief Executive's Responses

The comments from the Department of Arts, Heritage and Gaeltacht are noted.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.

Transport Assessment and Transport Strategy

- Submission from resident of north Kildare expressing concerns at the impact of the
 additional population on the train line will have on the existing public transport services
 from Celbridge to the City Centre. Submission outlines that the existing train services along
 the route are at capacity and that history and experience indicates that Ireland doesn't
 invest in public transport. (<u>DraftClonSDZ0046</u>, <u>Mark Field</u>)
- 2. Objections to transportation proposals in Planning Scheme include lack of clarity; failure to meet challenges of generated car trips; failure to consider car ownership (12,000 cars); flawed transport assumptions in relation to traffic volumes (post 2012); inconsistency in relation to job projections, and viability of new zero or zero parking developments including impact on residential tenure and market viability. Suggested solutions to transport issues include a timeline for the Lucan Luas, upgrading of strategic roads, linking the Celbridge road to Clonburris and staggering the phasing of the Adamstown and Clonburris SDZ. (DraftClonSDZ0096, Laura Flanagan DraftClonSDZ0098, Declan Donnelly DraftClonSDZ0111, Lucan Residents, Clonburris Lucan Action Group DraftClonSDZ0159, Paula McMahon DraftClonSDZ0073, Jim Houlihan DraftClonSDZ0099, Tanya McDonald Donnelly DraftClonSDZ0100, Frances Norton DraftClonSDZ0171, A Fahy DraftClonSDZ0173, Lisa Greene DraftClonSDZ0166, Andrew Mowatt DraftClonSDZ0044, Neil Nolan DraftClonSDZ0180, Rupert Fuller DraftClonSDZ0215, Graham Walsh DraftClonSDZ0216, LIONA O'TOOLE DraftClonSDZ0218, helen Nix DraftClonSDZ0107, Peter Corby, Griffeen Glen Residents Association DraftClonSDZ0219, Donncha Cleary DraftClonSDZ0220, Joe McDermott DraftClonSDZ0237, Hugh McSweeney DraftClonSDZ0255, James Haughton DraftClonSDZ0192, Brian O'Neill DraftClonSDZ0245, Stephen Murphy DraftClonSDZ0193, Kim Rice DraftClonSDZ0194, Brian Shortall DraftClonSDZ0235, Edina Almasi DraftClonSDZ0196, Andrea Panikova DraftClonSDZ0197, Damian McKillop DraftClonSDZ0231, Jennifer Winters DraftClonSDZ0198, Aine McKinlay DraftClonSDZ0267, Niamh Brennan DraftClonSDZ0265, Ian McLean DraftClonSDZ0248, Caroline O'Brien DraftClonSDZ0284, Evelyn Smyth DraftClonSDZ0285, Carol Hogg DraftClonSDZ0290, Agnes Maher DraftClonSDZ0331, Elaine Patriarca DraftClonSDZ0238, Martin Whelan DraftClonSDZ0333, Gary Hore DraftClonSDZ0309, Kim O Halloran DraftClonSDZ0262, Joseph <u>Dolan DraftClonSDZ0264, Christine Broderick DraftClonSDZ0266, Steven Abbey</u> DraftClonSDZ0312, Tina Mc Garry DraftClonSDZ0054, Celine Dunning DraftClonSDZ0200, Lisa Murtagh DraftClonSDZ0278, Liam Swan DraftClonSDZ0347, Una Mullaney DraftClonSDZ0206, Sean Smith DraftClonSDZ0314, Grainne Hargaden DraftClonSDZ0191, Rafal Marzec DraftClonSDZ0204, William Lavelle DraftClonSDZ0393, Ronan Burke DraftClonSDZ0396, Emer Lynch DraftClonSDZ0397, Marta Isopo DraftClonSDZ0363, Marta





Estalayo DraftClonSDZ0352, Rita O'Brien DraftClonSDZ0279, Lisa Fitzpatrick DraftClonSDZ0280, John Egan DraftClonSDZ0367, ciaran daly DraftClonSDZ0401, Joyce Dolan DraftClonSDZ0403, Kerrie Walsh DraftClonSDZ0369, Patricia Dunphy DraftClonSDZ0356, Peter Flynn DraftClonSDZ0359, Denis Twohig, Westbury Court Residents Association DraftClonSDZ0110, Maria Smith DraftClonSDZ0101, Peter Kelly DraftClonSDZ0263, Eilís Slattery DraftClonSDZ0376, Marie Fitzpatrick DraftClonSDZ0378, Patrick Tully DraftClonSDZ0413, Tania Daly DraftClonSDZ0414, Fiona Moriarty DraftClonSDZ0417, Siobhan Donnelly DraftClonSDZ0420, Ian Lamon DraftClonSDZ0432, Sara Lemos DraftClonSDZ0056, Elizabeth Grace DraftClonSDZ0143, colm grogan DraftClonSDZ0470, Stephen O'Brien DraftClonSDZ0475, Stephanie Fleming DraftClonSDZ0474, Conor Smith DraftClonSDZ0473, Mark O'Byrne DraftClonSDZ0472, Mark Brennan DraftClonSDZ0431, Andrew Shinnick DraftClonSDZ0467, Gavin Byrne DraftClonSDZ0468, Jack Byrne DraftClonSDZ0469, Richard Gleeson DraftClonSDZ0183, karen hayes DraftClonSDZ0184, Barry Jenkinson DraftClonSDZ0185, Hazel Smyth DraftClonSDZ0433, Ciara Reidy DraftClonSDZ0435, Tilly Reidy DraftClonSDZ0186, Nicola Kennedy DraftClonSDZ0438, Des Delaney DraftClonSDZ0189, mark reid DraftClonSDZ0476, Lynne Cosgrave <u>DraftClonSDZ0441, Liam Reidy DraftClonSDZ0477, Sarah Gill DraftClonSDZ0478, Muhammad</u> Ali DraftClonSDZ0479, Anna Wezyu DraftClonSDZ0480, Gill Devereux DraftClonSDZ0471, Michael Clarke DraftClonSDZ0450, Cherie Lynch DraftClonSDZ0449, Marian Spollen <u>DraftClonSDZ0225, Sarah Moroney DraftClonSDZ0448, Declan Cotter DraftClonSDZ0447,</u> Aine O'Sullivan DraftClonSDZ0444, Adrian Reidy DraftClonSDZ0445, Nuala Reidy DraftClonSDZ0443, Grace Lombard DraftClonSDZ0446, Elaine Collins DraftClonSDZ0439, Veronica O'Callaghan DraftClonSDZ0339, Harry Lee DraftClonSDZ0436, Mr Naheed DraftClonSDZ0437, Eoin Cullen DraftClonSDZ0257, Deirdre McIntyre DraftClonSDZ0294, Kenny Doyle DraftClonSDZ0297, Celine Kiernan DraftClonSDZ0298, Laura Spencer DraftClonSDZ0299, Sharon Cleary DraftClonSDZ0236, ISO Solutions Ireland, ISO Solutions <u>Ireland DraftClonSDZ0497, Owner/ Occupier DraftClonSDZ0322, Catherine Brady</u> DraftClonSDZ0491, Wayne Quinn DraftClonSDZ0390, Tom Fitzpatrick DraftClonSDZ0421, Lesley Keogh DraftClonSDZ0422, Jonathan Mercier DraftClonSDZ0423, Damien Moloney DraftClonSDZ0424, John Coleman DraftClonSDZ0425, Sinead Hall DraftClonSDZ0426, Breeda De Vines DraftClonSDZ0427, Ciara Weafer DraftClonSDZ0428, Helena Doyle DraftClonSDZ0429, Edelle Boles DraftClonSDZ0430, Ashleigh D'Arcy DraftClonSDZ0451, K E Fendic DraftClonSDZ0452, Leighanne Spollen DraftClonSDZ0453, Skirmante Doda DraftClonSDZ0454, Sean Shortt DraftClonSDZ0527, Laura Gaughan DraftClonSDZ0528, Bernard Gaughan DraftClonSDZ0519, Mr or Mrs Carew DraftClonSDZ0529, Leigh Ann Gilmore DraftClonSDZ0535, Aileen Blackwell Kelly DraftClonSDZ0525, Dermot McGreal <u>DraftClonSDZ0540</u>, John McGivney, Finnstown Abbey Residents Association DraftClonSDZ0541, Mags Phelan DraftClonSDZ0542, Ciara McHugh DraftClonSDZ0543, Terence Phelan DraftClonSDZ0544, Martina Magee DraftClonSDZ0545, Geoff Grice DraftClonSDZ0546, Sandra Coleman DraftClonSDZ0547, Harry Lee, Larkfield Residents Association DraftClonSDZ0548, Ciaran & Amanda O'Rourke DraftClonSDZ0549, Sheena Bolger DraftClonSDZ0550, Cian Fleming DraftClonSDZ0559, Brian McKenna DraftClonSDZ0565, Jennifer McKenna DraftClonSDZ0483, Nuno Limos DraftClonSDZ0485, Grace Quinn DraftClonSDZ0487, Liam Canty DraftClonSDZ0489, Sarah Walsh <u>DraftClonSDZ0484, Liam Lynch</u> <u>DraftClonSDZ0482, Jason Shanley DraftClonSDZ0517, Niall</u> and Sandra Harrington DraftClonSDZ0486, Brian Kennedy DraftClonSDZ0488, Michaela Larsson DraftClonSDZ0490, Elaine McManamly DraftClonSDZ0385, Ceola Stanley)

 Concerns identified in relation to the Transport Assessment and ERM include use of 2011 and 2012 baseline data, failure to use 2016 POWSCAR data, projected car trips, projected performance at junctions (V/C & LOS), adequacy/timing of road proposals, adequacy/timing of public transport proposals including Dart to Hazelhatch and Lucan Luas. Suggested





solutions include agreeing a timeframe for the Lucan Luas, upgrading strategic roads, connecting Clonburris with the Celbridge Link Road, staggering the phasing of Adamstown and Clonburris, updating traffic modelling data (from 2016), and bringing transport infrastructure including services forward (Outer Orbital Route, Dart to Hazelhatch, rail services and Lucan Luas). (DraftClonSDZ0096, Laura Flanagan DraftClonSDZ0111, Lucan Residents, Clonburris Lucan Action Group DraftClonSDZ0159, Paula McMahon DraftClonSDZ0098, Declan Donnelly DraftClonSDZ0073, Jim Houlihan DraftClonSDZ0099, Tanya McDonald Donnelly DraftClonSDZ0100, Frances Norton DraftClonSDZ0171, A Fahy <u>DraftClonSDZ0173</u>, <u>Lisa Greene</u> <u>DraftClonSDZ0166</u>, <u>Andrew Mowatt DraftClonSDZ0180</u>, Rupert Fuller DraftClonSDZ0212, Sean Giblin, Finnstown Fairways Residents Association DraftClonSDZ0215, Graham Walsh DraftClonSDZ0216, LIONA O'TOOLE DraftClonSDZ0218, helen Nix DraftClonSDZ0107, Peter Corby, Griffeen Glen Residents Association DraftClonSDZ0219, Donncha Cleary DraftClonSDZ0220, Joe McDermott DraftClonSDZ0237, Hugh McSweeney DraftClonSDZ0255, James Haughton DraftClonSDZ0245, Stephen Murphy DraftClonSDZ0192, Brian O'Neill DraftClonSDZ0193, Kim Rice DraftClonSDZ0194, Brian Shortall DraftClonSDZ0235, Edina Almasi DraftClonSDZ0196, Andrea Panikova DraftClonSDZ0197, Damian McKillop DraftClonSDZ0231, Jennifer Winters DraftClonSDZ0198, Aine McKinlay DraftClonSDZ0267, Niamh Brennan DraftClonSDZ0265, Ian McLean DraftClonSDZ0248, Caroline O'Brien DraftClonSDZ0284, Evelyn Smyth DraftClonSDZ0285, Carol Hogg DraftClonSDZ0290, Agnes Maher DraftClonSDZ0331, Elaine Patriarca DraftClonSDZ0238, Martin Whelan DraftClonSDZ0333, Gary Hore DraftClonSDZ0309, Kim O Halloran DraftClonSDZ0262, Joseph Dolan DraftClonSDZ0264, Christine Broderick DraftClonSDZ0266, Steven Abbey DraftClonSDZ0312, Tina Mc Garry DraftClonSDZ0054, Celine Dunning DraftClonSDZ0200, Lisa Murtagh DraftClonSDZ0206, Sean Smith DraftClonSDZ0278, Liam Swan DraftClonSDZ0347, Una Mullaney DraftClonSDZ0314, Grainne Hargaden DraftClonSDZ0191, Rafal Marzec DraftClonSDZ0204, William Lavelle DraftClonSDZ0393, Ronan Burke DraftClonSDZ0396, Emer Lynch DraftClonSDZ0397, Marta Isopo DraftClonSDZ0363, Marta Estalayo DraftClonSDZ0352, Rita O'Brien DraftClonSDZ0279, Lisa Fitzpatrick DraftClonSDZ0280, John Egan DraftClonSDZ0367, ciaran daly DraftClonSDZ0401, Joyce Dolan DraftClonSDZ0403, Kerrie Walsh DraftClonSDZ0356, Peter Flynn DraftClonSDZ0359, Denis Twohig, Westbury Court Residents Association DraftClonSDZ0110, Maria Smith DraftClonSDZ0101, Peter Kelly DraftClonSDZ0376, Marie Fitzpatrick DraftClonSDZ0378, Patrick Tully DraftClonSDZ0413, Tania Daly DraftClonSDZ0414, Fiona Moriarty DraftClonSDZ0417, Siobhan Donnelly DraftClonSDZ0420, Ian Lamon DraftClonSDZ0432, Sara Lemos DraftClonSDZ0143, colm grogan DraftClonSDZ0431, Andrew Shinnick DraftClonSDZ0183, karen hayes DraftClonSDZ0184, Barry Jenkinson DraftClonSDZ0185, Hazel Smyth DraftClonSDZ0433, Ciara Reidy DraftClonSDZ0435, Tilly Reidy DraftClonSDZ0438, Des Delaney DraftClonSDZ0189, mark reid DraftClonSDZ0476, Lynne Cosgrave DraftClonSDZ0450, Cherie Lynch DraftClonSDZ0225, Sarah Moroney DraftClonSDZ0448, Declan Cotter DraftClonSDZ0447, Aine O'Sullivan DraftClonSDZ0443, Grace Lombard DraftClonSDZ0446, Elaine Collins DraftClonSDZ0439, Veronica O'Callaghan DraftClonSDZ0339, Harry Lee DraftClonSDZ0436, Mr Naheed DraftClonSDZ0437, Eoin Cullen DraftClonSDZ0257, Deirdre McIntyre DraftClonSDZ0294, Kenny Doyle DraftClonSDZ0297, Celine Kiernan DraftClonSDZ0298, Laura Spencer DraftClonSDZ0299, Sharon Cleary DraftClonSDZ0497, Owner/ Occupier DraftClonSDZ0322, Catherine Brady DraftClonSDZ0491, Wayne Quinn DraftClonSDZ0390, Tom Fitzpatrick DraftClonSDZ0421, Lesley Keogh DraftClonSDZ0422, Jonathan Mercier DraftClonSDZ0423, Damien Moloney DraftClonSDZ0424, John Coleman DraftClonSDZ0425, Sinead Hall DraftClonSDZ0426, Breeda <u>De Vines DraftClonSDZ0427, Ciara Weafer DraftClonSDZ0428, Helena Doyle</u> DraftClonSDZ0429, Edelle Boles DraftClonSDZ0430, Ashleigh D'Arcy DraftClonSDZ0454, Sean Shortt DraftClonSDZ0527, Laura Gaughan DraftClonSDZ0528, Bernard Gaughan





DraftClonSDZ0519, Mr or Mrs Carew DraftClonSDZ0529, Leigh Ann Gilmore
DraftClonSDZ0535, Aileen Blackwell Kelly DraftClonSDZ0525, Dermot McGreal
DraftClonSDZ0540, John McGivney, Finnstown Abbey Residents Association
DraftClonSDZ0541, Mags Phelan DraftClonSDZ0542, Ciara McHugh DraftClonSDZ0543,
Terence Phelan DraftClonSDZ0544, Martina Magee DraftClonSDZ0545, Geoff Grice
DraftClonSDZ0546, Sandra Coleman DraftClonSDZ0547, Harry Lee, Larkfield Residents
Association DraftClonSDZ0548, Ciaran & Amanda O'Rourke DraftClonSDZ0549, Sheena
Bolger DraftClonSDZ0483, Nuno Limos DraftClonSDZ0485, Grace Quinn DraftClonSDZ0487,
Liam Canty DraftClonSDZ0489, Sarah Walsh DraftClonSDZ0484, Liam Lynch
DraftClonSDZ0482, Jason Shanley DraftClonSDZ0517, Niall and Sandra Harrington
DraftClonSDZ0486, Brian Kennedy DraftClonSDZ0490, Elaine McManamly DraftClonSDZ0385,
Ceola Stanley)

- 4. Submission on behalf of Clondalkin community group lists issues in relation to traffic counts and highlights concerns in relation to the number of car trips. (DraftClonSDZ0246, <a href="https://doi.org/10.20246, George Graham, <a href="https://doi.org/10.20246, George Graham, <a href="https://doi.org/10.20246, George Graham, <a href="https://doi.org/10.20246, <a href="https:
- Submission outlines that a number of nearby developments including Lucan, Liffey Valley, Park West, Grange Castle Business Park and Adamstown are likely to have increased movement associated with them due to their own development and questions the likely impact of these on Clonburris and on surrounding communities. (<u>DraftClonSDZ0272</u>, Andy Lane)
- 6. One of the bus routes should be redirected to the outer ring road to avoid opening cul de sacs in Foxborough. (DraftClonSDZ0154, Liah Caffiere)
- 7. Submission outlines that the Transport Assessment & Strategy fails to assess the actual real-term impact of additional traffic on the local road network and junctions. Submitted that this assessment is deficient as the local road network cannot accommodate this additional traffic (DraftClonSDZ0204, William Lavelle)
- 8. The submission states that it is imperative that the Draft Planning Scheme includes a substantial and very detailed traffic and transport assessment for Lucan prepared by an independent external source. The traffic and transport assessment should be based on CSO and census data. (DraftClonSDZ0269, Shane Roche)
- It is imperative that the Draft Planning Scheme includes a substantial and very detailed traffic and transport assessment for Lucan prepared by an independent external source. The traffic and transport assessment should be based on CSO and census data. (<u>DraftClonSDZ0269</u>, <u>Shane Roche</u>)
- 10. Submission on behalf of TII advises that that it is critical for the Draft Planning Scheme to take account of the transport requirements that support the area and environs as indicated in the GDA Transport Strategy 2016 2035. Reference is made to the N4/N7 Corridor Study (NTA, 2017) including its objectives. It is noted that a Transport Assessment that was carried out for the Draft Planning Scheme with the support of the NTA and that the Transport Assessment takes account of the N4/N7 Corridor Study. (DraftClonSDZ0057, Tara Spain, Transport Infrastructure Ireland)
- 11. Submission from Clondalkin resident highlights concerns in relation to the projected modal split for public transport (25%) in terms of ambition for short or long journeys. Concerns are also raised in relation to the projected percentage of trips that will remain within the N4, N7 and M50 sector (51% AM Period) and it is suggested that a new local public transport system is necessary and this could include local shuttle buses. Queries are also raised in relation to how people will travel within the SDZ lands. (DraftClonSDZ0358, Eoin Ó Broin)
- 12. Dublin Bus agree with the key principles outlined in the Transport assessment and Strategy Report. (<u>DraftClonSDZ0336</u>, Ray Donnellan, <u>Dublin Bus</u>)

Clonburris



- 13. As noted in the Transport Report, Bus has the flexibility to alter service patterns according to changing demand and this will be the case throughout the timescale of the proposals modelled. (DraftClonSDZ0336, Ray Donnellan, Dublin Bus)
- 14. Detailed proposals around routings, especially local services are noted as being derived for modelling purposes and do not form proposals at this stage. Dublin Bus agree with this view and consider the approach valid. There is no doubt that the quantum of development proposed will require additional services and network changes and ongoing review of the development will lead to an evolving network to serve the SDZ and surrounding areas. (DraftClonSDZ0336, Ray Donnellan, Dublin Bus)
- 15. Joint submission from local representatives highlights concerns in relation to the historic traffic count data used in the transport modelling and it is requested that 2016 POWSCAR data be reviewed as soon as it is published. (DraftClonSDZ0419, Cllr. Emer Higgins, Cllr. Vicki Casserly & Cllr. Kenneth Egan)
- 16. Joint submission from local representatives highlights concerns in relation to the guarantee, timelines and funding of transport projects that are contained in the Transport Assessment and Strategy (roads, bus, heavy rail and light rail) including buy in from transport stakeholders. (DraftClonSDZ0419, Cllr. Emer Higgins, Cllr. Vicki Casserly & Cllr. Kenneth Egan
- 17. Submission outlines that the economic/retail floorspace allowed for is unlikely to compare in scale to nearby hubs and as such, the SDZ should be mindful that existing outbound transport demand patterns are likely to continue and could further increase existing traffic and transport congestion (DraftClonSDZ0368, Frances Fitzgerald TD)
- 19. There should be 'Linked up Planning' and that the Housing Emergency currently being experienced should not be the only urgent consideration in making the SDZ but the chronic and worsening traffic situation in the surrounding communities as well as across Dublin must also be factored in. (DraftClonSDZ0399, Guss O'Connell)
- 20. The projections in the Traffic Assessment were based on a review of existing transport behaviour based on 2012 travel data extracted from the Eastern Regional Model. This data does not necessarily reflect current behaviour in 2017 due to the significant increase in employment since that time. A new review should be conducted using the more recent 2016 census data. Even if the plans are delayed until later in 2018 in order to provide these figures then that should be seriously considered. (DraftClonSDZ0308, Madeleine Johansson, People Before Profit)
- 21. A more accessible and transparent approach is required with respect to assessing the traffic impact of the proposed development on local road junctions. This approach should include a transparent statement of 2017 baseline traffic levels, the estimated additional vehicle trips to be added to the junction arising from all cumulative development at Clonburris, Adamstown, Liffey Valley, Grange Castle and Coolamber; and a detailed assessment of the traffic flow and queuing performance of each junction as a result. This assessment should include all junctions along Grangecastle, Newcastle and Fonthill roads. (<u>DraftClonSDZ0204</u>, William Lavelle)
- 22. The transport modelling analysis date should be updated with the data from 2016. (<u>OraftClonSDZ0536</u>, <u>Michael Jennings DraftClonSDZ0531</u>, <u>Adrienne O'Driscoll DraftClonSDZ0532</u>, Ciaran O'Driscoll)
- 23. Section 2.5 of the Transport Strategy analyses travel patterns to, from, and within the area. Figure 2.6 seems to be misleading in its breakdown of modes (based on ERM Traffic Model) used in different city sectors. Clarification is sought in this regard.





Dublin Cycling Campaign endorse the principle of having all internal areas of the SDZ with a 30kph speed limit. This level of speed limit encourages a greater level of active movement, and in particular the ability of children to play in these areas.

Dublin Cycling Campaign note that the predictions in Section 6.4.3 'Mode Share' are based on the ERM Traffic Forecasting model, and dependant on the implementation of certain transport projects, the results are very dispiriting in terms of the continued expected dominance of the private car, both in 2026 and right through 2035.

Dublin Cycling Campaign note in Table 7.1 'Street Hierarchy Attributes' the proposal to use Toucan Crossings throughout the area - 27 in total. It is proposed that with greater detailed design of these routes and likely technological developments, that speed compliance by motor vehicles will be at a much higher level than presently. A clear statement is sought proposing the wider use of Zebra Crossings and clear priority for pedestrians over vehicles.

Dublin Cycling Campaign note the draft cross sections in Table 7.2, which indicate carriageway widths of 6.5 to 7metres for internal LINK roads. It is suggested that these widths encourage higher vehicle speeds, and thus decrease safety for vulnerable road users. It is recommended that in all neighbourhood and district areas, that vehicle lanes be designed at the minimum acceptable width of 3 metres. It is also noted that 4 metres should be stated consistently as the width for greenways.

Section 7.4 of the Transport Assessment and Transport Strategy details modelling of future vehicle traffic around the surrounding network. This predicts an increase in congestion at a sizeable number of junctions. Dublin Cycling Campaign recommend that broader policies will need to be developed, in line with improved technology and changed travel patterns, to dampen the use of the private car in order to reduce the perceived V/C ratios for future vehicle use.

Dublin Cycling Campaign raise design concerns with regard to junctions S1, S5, S6, S11, S12, S13 and S14.

- Junction S1 as designed is not amenable to safe cycling. The proposal to include left turn flare lanes is likely to decrease cycling level of service. Design standards for cycling improvement need to be upgraded and fully in line with best practice. All signalised junctions should include an advanced green light for cyclists, to improve safety, and provide priority T junctions.
- Junctions S5, S6, S13 along Omer Way are poorly designed and will discourage cyclists travelling along Omer Way, as they are required to detour off Omer Way to continue straight ahead. This is unacceptable, and cyclists need to be given priority.
- Junctions S11, S12, S14, need to include straight through cycle track facilities in line with best practice. Proposed designs are cycle inadequate.
- Roundabouts as presently designed are cyclist and pedestrian unfriendly. Appropriate, ideally Dutch based, designs to give priority to cyclists need to be developed in line with best practice.

Dublin Cycling Campaign note the reference throughout to 'Filtered Junctions'. It is presumed these relate to junctions only accessible to pedestrians and cyclists. Clarity needs to be provided on this, as ensuring permeability in line with NTA policy is a key to increasing active mode share.

(DraftClonSDZ0382, Paul Corcoran, Dublin Cycling Campaign)





24. Proposed Local Bus Service - In the light of the 'Dublin Area Bus Network Redesign Choices Report' it would appear that bus services are very fluid, how much influence does Clonburris have in relation to new bus routes and changes to existing routes Revise route 40 Bus: see above, communities of Earlsfort, St Marks and Balgaddy have a longer walk to get a bus to town and that for the wider North Clondalkin area that the bus won't go to Liffey Valley Shopping Centre any more (DraftClonSDZ0272, Andy Lane)

Chief Executive's Responses

Sufficiency of Transport Modelling

The transport assessment methodology and traffic modelling that has been undertaken as part of the Transport Assessment and Transport Strategy for the Draft Planning Scheme complies with national standards. The National Transport Authority's (NTA) Regional Modelling System is the most sophisticated modelling tool available for assessing complex multi modal movements within an urban context. This provides a consistent framework for transport assessment.

As stated under Section 2.2.1 of the Draft Planning Scheme, the NTA Eastern Regional Model (ERM) has been used to assess the traffic and transport impacts of the Clonburris SDZ and its proposed transport strategy. A local junction model has been developed to test the local impacts of the proposed SDZ. The model represents all types of trips and transport movements, for example, for work trips, school trips and leisure trips throughout the day and therefore assesses all aspects of the demand for travel arising from Clonburris and the surrounding communities.

The ERM has been used to report the impacts in the years 2026 and 2035 and has focussed upon the following key outputs:

- Mode Share;
- Public Transport Line Flows; and
- Junction performance and network delay in the wider N4/N7/M50 Corridor

Further to concerns raised in submissions in relation to the robustness of the data sets used in the Transport Assessment; it is recognised that whilst the base year for the ERM is based on the 2011 Census and 2012 Household Travel survey data, all assessments have been undertaken for a forecast year of 2035, which assumes the full build out of Adamstown and other developments in South Dublin County in line with South Dublin County Council's Development Plan and extant planning permissions. This analysis also includes data in relation to future population projections, employment levels, car ownership and car availability. As such, the Transport Assessment made use of the best readily available data sources. Whilst it is a planned task for the NTA to update the ERM with 2016 Census data, this is unlikely to be completed until sometime into 2018.

It should be noted that the 2011 POWSCAR data relates to origin and destinations for places of work, school and college for the students/workers in the vicinity of the SDZ lands and does not relate to traffic counts. More up to date traffic data was used to help inform the ERM for the purposes of junction modelling as part of the transport assessment and transport strategy.

Further to suggestions in relation to wider transport issues, it is advised that the Transport Strategy for the Greater Dublin Area (GDA) 2016 - 2035 forms the backbone to the movement framework for the Draft Planning Scheme. While the Lucan Luas and medium to long term road proposals included in the South Dublin County Council Development Plan 2016 – 2022 (Celbridge Link Road, Western Dublin Orbital Route etc.) have been tested as part of the wider strategic analysis under the Transport Assessment; the Tallaght – Blanchardstown Core Orbital Bus Route (along with additional





bus routes), the DART Expansion Programme, the internal street network and local junction upgrades have been modelled to service the trip demands generated by Clonburris in line with the programme set out under the Transport Strategy for the GDA. The development of the SDZ lands is therefore not considered to be reliant on all aspects of the GDA Transport Strategy such as the Lucan Luas or the medium to long terms road proposals contained in to the County Development Plan. These wider projects will be provided under capital programmes and plans associated with the Transport Strategy for the GDA and the County Development Plan. Issues in relation to the phasing of public transport and road infrastructure are dealt with under the Chapter 4 (Phasing) summaries and responses.

Assessment of Vehicular Contribution Flows and Junction Upgrades

Further to the concerns highlighted in submissions received in terms of dealing with the challenges of traffic congestion, junction upgrades and car ownership; contribution flows from Clonburris have been modelled on surrounding roads (including the Fonthill Road, Grange Castle Road, Newcastle Road, Thomas Omer Way and Adamstown Avenue) and an assessment of the impact on proposed local junctions including planned upgrades have been assessed.

The Transport Assessment and Strategy models the impact of trip demands using a comprehensive approach that analyses mode of transport, destination and time periods rather than focusing on assumed car ownership projections. Within this context, the following are some of the primary conclusions in relation to the modelled horizon year of 2035:

- Approx. 54% of trips in the AM peak (7 AM 10 AM) will be undertaken by walking, cycling and public transport;
- Approx. 56% of trips originating in Clonburris will be less than 4km in length;
- Approx. 27% of trips which originate in Clonburris will stay within the SDZ lands;
- Clonburris will generate approximately 1,700 passenger car units on the wider road network in the AM peak hour (08:00 0:900);
- Approx. 72% of car trips generated by Clonburris in the AM peak period are forecast to stay within the area bound by the N4, N7 and M50;
- Traffic generated by Clonburris will contribute to less than 1% of the overall traffic on the strategic road network in the AM peak period;
- Areas within the N4/N7/M50 boundary will experience congestion and delay in 2035 irrespective of whether Clonburris is developed;
- The majority of identified junctions in the vicinity of Clonburris will operate satisfactorily in peak periods (AM, Lunch Time, School Run and PM);
- A comparison with an alternative 'redistributed' scenario where the projected development for Clonburris is redistributed to other areas within the County and North Kildare indicates that the Draft Planning Scheme performs better in terms of the performance of the strategic street network by reason of (inter alia) the sustainable modal split that can be achieved on the SDZ lands.

The primary conclusion of the Transport Assessment and Strategy states that Clonburris is one of the most optimal locations for large scale development in the state due to the availability of high-frequency and high capacity public transport infrastructure as well as walking and cycling.

It is noted that the Practical Reserve Capacity levels of two planned junctions on the Fonthill Road (S8 and S10) will be exceeded for southbound traffic in the AM peak period in 2035. This can be mitigated, however, through the implementation of linked signal timings that can optimise the performance of traffic signals in order to reduce queuing and delays.

Clonburris



Modelling and Sufficiency of Planned Public Transport Services

The Transport Assessment and Strategy (Chapter 6) models the impact of the Draft Clonburris Planning Scheme combined with existing and planned development on the planned transport network for 2026 and 2035 in terms of trip demand and supply. The high quality public transport infrastructure projects that are planned under the NTA's Transport Strategy for the Greater Dublin Area 2016 – 2035 have been factored into this assessment. These projects include the DART Expansion Programme, the Lucan Luas, the Tallaght – Blanchardstown Core Orbital Bus Route and other Core Radial Bus Routes. The projected horizon years and capacity for the planned public transport projects (2026 and 2035) that will serve the SDZ lands are detailed in the Transport Assessment and Strategy.

Further to concerns raised in submissions in relation to the sufficiency of existing and planned public transport services, the DART expansion programme will provide faster and higher frequency electrified services to Hazelhatch on the Kildare Line and will incorporate an underground rail link through Dublin City Centre also enabling passengers on the Kildare Line to connect with DART service on other lines. Core bus routes will also serve higher frequency bus services with high passenger numbers and will serve significant destinations in the Dublin Metropolitan Area while being augmented by local bus routes and will provide a faster and more efficient alternative to car traffic along a network of existing and new bus lanes. The Tallaght – Blanchardstown Core Orbital Bus Route will connect Tallaght, Clondalkin, Lucan and Clondalkin with such services via the SDZ lands thus introducing a new orbital route and addressing many concerns raised in submissions. These planned projects will connect the SDZ lands, including existing public transport services and infrastructure, into an integrated cross metropolitan network of orbital and radial routes.

A Public Transport Strategy has been factored into the Draft Planning Scheme's Transport Assessment and Strategy. In terms of bus provision the planned core routes include the aforementioned Tallaght - Blanchardstown Core Orbital Route together with a proposed Tallaght-Liffey Valley Secondary Orbital Route that have been modelled based on a frequency of 5 minutes and 15 minutes respectively. The Tallaght-Liffey Valley Secondary Orbital Route has been modelled to operate via Grange Castle Road/Outer Ring Road. Planned local routes that include a Lucan-Park West Route and a Grange Castle-Liffey Valley Route have also been modelled with frequencies of between 10 and 11 minutes respectively. It is projected that the planned orbital routes will result in a public transport mode share of 45% for the Tallaght Sector and 42% in the North West Sector of Dublin City. Within this context, it is noted that the submission of Dublin Bus agrees with the principles of the Transport Strategy and ongoing review of the development will lead to an evolving network to serve the SDZ and surrounding areas.

In terms of the capacity of the planned DART expansion programme, frequencies of 7.5 minutes from Clonburris to the City Centre are projected. The boarding and alighting profile for these DART services in the AM peak hour (08:00 – 09:00) have been modelled and demonstrated in the Transport Assessment and Strategy (Figs 7.8 and 7.9). It is projected that the service will have a maximum passenger volume of 6,000 people in the AM peak hour and this will be more than adequate to cater for the projection of approximately 2,000 passengers boarding at stations in Clonburris. Furthermore, both the Kishoge and Clondalkin-Fonthill Railway stations will serve as interchanges between rail services and the planned bus routes (orbital and local) and existing and as well as other modes (car, walking and cycling).

Further to concerns raised in submissions in relation to committing to the planned public transport proposals that have been modelled as part of the Transport Assessment and Strategy including proposed bus routes, a submission from the NTA on the Draft Planning Scheme confirms that the NTA is committed to deliver the level of public transport infrastructure required to serve Clonburris





including transport proposals under Transport Strategy element of the Transport Assessment and Strategy such as the DART Underground and Core Bus Network proposals. This includes the aforementioned orbital and local bus routes. The submission of the NTA also states that it is intended to complete the BusConnects Programme and to deliver a more efficient and flexible bus service by 2019 that will cater for the demands of the SDZ Planning Scheme.

Within the context of the above, the following main findings of the Transport Assessment and Strategy further highlights that public transport provision will be sufficient to serve the projected trip demands of Clonburris:

- Approx. 75% of residents will be able to access a bus stop within 400 metres and a train station within 800 metres walking distance;
- Approx. 54% of trips in the AM peak (7 AM 10 AM) will be undertaken by walking, cycling and public transport;
- A large proportion (30%) of public transport trips which originate in Clonburris will be destined for Dublin City Centre;
- Planned orbital routes will result in a public transport mode share of 45% for the Tallaght Sector and 42% in the North West Sector of Dublin City.

Further to concerns raised in relation to the sufficiency of the projected modal split for sustainable modes of transport (54%) and policies to further encourage such modes, it is advised that the projected modal split aligns with the target set out under Smarter Travel: A Sustainable Transport Future 2009 – 2020 (2009). Furthermore, the overarching principle of the Movement and Transport Strategy contained in Section 2.2 of the Draft Planning Scheme seeks to maximise sustainable modes of transport as much as possible.

Walking and Cycling Strategy

Further to the submission seeking clarity in relation to the nature of pedestrian and cycle crossings, it is advised that the design of streets at this level is governed by DMURS and the National Cycle Manual (2011) and it is a requirements of the Draft Planning Scheme to design streets in accordance with said documents. Toucan Crossings are suggested for Arterial and Link Streets under the Transport Strategy in the context of their strategic nature for integrated pedestrian and cycle movement and as an important element of the walking and cycling strategy. It is not considered necessary to further include a statement on zebra crossings in the context that details for such are already set out under DMURS. The requirement and design of zebra crossings will be assessed at detailed planning application stage.

The carriageway widths for Link Streets indicated on Table 7.2 of the Transport Assessment and Strategy are consistent with the provisions of DMURS and will allow for the circulation of buses in the context of the primary function of Link Streets as the principle corridors of movement within the SDZ lands and in accordance with the public transport strategy for the SDZ lands. Precise carriageway widths for specific streets will be assessed at detailed planning application stage. The provisions of DMURS will allow for carriageways widths of 6 metres if and where appropriate. In terms of greenways, Table 7.2 already states a preferred width of 4 metres.

Further to concerns raised in relation to safety of junctions, it is advised that, under the Draft SDZ Planning scheme, Arterial Streets will retain their functions as the principle corridors of movement for vehicular traffic while accommodating routes for pedestrians and cyclists. The Draft Planning Scheme seeks to upgrade such strategic roads as urban streets in order to improve pedestrian and cycle movement and safety with reduced traffic speeds through a combination of measures that include upgrading of roundabout junctions and the provision of new junctions designed for integrated movement. This forms part of the Phase 2 requirements of the Draft Planning Scheme,





however, it should be noted that this is a minimum provision and strategic road and junctions upgrades can be provided earlier than Phase 2.

In terms of the local junction assessment contained under the street network strategy for the SDZ lands, preliminary designs have been created for junctions on the basis of the overarching principles of the Draft Planning Scheme and the modelling results thus incorporating an evidence based approach to their design. Within this context, junctions have been designed for appropriate levels of cycle safety and priority. This includes for the removal of roundabout junctions and the provision of signalised toucan crossings together with direct single movement crossings where feasible. Furthermore, it is advised that the final detailed design of junctions will be assessed at planning application stage in accordance with the requirements of DMURS and the National Cycle Manual (2011).

In terms of the purpose of filtered junctions, Section 2.2.4 of the Draft Planning Scheme (Street Network and Vehicular Movement) states that Local Streets that provide through routes for strategic pedestrian and cycle routes should be filtered to prioritise pedestrian and cyclist through access where junctions intersect with Link or Arterial Streets. This is illustrated under Figure 2.2.3 of the Draft Planning Scheme. It is further stated under Section 2.8.5 (street and junction design) that such junctions shall prevent through vehicular traffic movement by incorporating appropriate design measures.

Further to concerns raised in relation to the assessment of mode share, Figs 2.5 and 2.6 of the Transport Assessment set out an existing transport demand overview based on the distribution of trips to the sector in which Clonburris is located (South West Sector) in terms of trip distribution and mode share.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft Planning Scheme.





Outside Scope of Planning Scheme or SDZ Lands

Adamstown SDZ

- Adamstown is a built up area, with more housing than amenities. People were placed there
 without any facilities to provide them with any quality of life. There is a concern that this
 could occur again, leading to anti-social behaviour problems. (<u>DraftClonSDZ0026, Sarah</u>
 Cleary)
- 2. Adamstown has been a failure. (DraftClonSDZ0037, Darren Johnson)
- 3. The Adamstown SDZ is currently at Phase 2 and is only 25% built. (<u>DraftClonSDZ0051</u>, <u>Brendan Keenan DraftClonSDZ0040</u>, Foxborough Residents Group Lucan, Foxborough Residents Group)
- 4. The draft planning scheme is based on Adamstown and it is impossible to ascertain if the SDZ model has been successful sufficient and delivered sustainable communities. The plan intends to use the roads and other infrastructure of Adamstown, which has not yet been delivered or proven capable of dealing even with the current population of Adamstown, let alone Adamstown and Clonburris combined (approx. 19,000 homes, equating to approximately 45,000 residents). (DraftClonSDZ0111, Lucan Residents, Clonburris Lucan Action Group DraftClonSDZ0159, Paula McMahon DraftClonSDZ0098, Declan Donnelly DraftClonSDZ0099, Tanya McDonald Donnelly DraftClonSDZ0171, A Fahy DraftClonSDZ0173, Lisa Greene DraftClonSDZ0166, Andrew Mowatt DraftClonSDZ0044, Neil Nolan DraftClonSDZ0180, Rupert Fuller DraftClonSDZ0040, Foxborough Residents Group Lucan, Foxborough Residents Group DraftClonSDZ0073, Jim Houlihan DraftClonSDZ0215, Graham Walsh DraftClonSDZ0218, helen Nix DraftClonSDZ0219, Donncha Cleary DraftClonSDZ0107, Peter Corby, Griffeen Glen Residents Association DraftClonSDZ0220, Joe McDermott DraftClonSDZ0237, Hugh McSweeney DraftClonSDZ0255, James Haughton DraftClonSDZ0192, Brian O'Neill DraftClonSDZ0245, Stephen Murphy DraftClonSDZ0193, Kim Rice DraftClonSDZ0194, Brian Shortall DraftClonSDZ0235, Edina Almasi DraftClonSDZ0196, Andrea Panikova DraftClonSDZ0197, Damian McKillop DraftClonSDZ0231, Jennifer Winters DraftClonSDZ0198, Aine McKinlay DraftClonSDZ0267, Niamh Brennan DraftClonSDZ0265, Ian McLean DraftClonSDZ0248, Caroline O'Brien DraftClonSDZ0284, Evelyn Smyth DraftClonSDZ0285, Carol Hogg DraftClonSDZ0290, Agnes Maher DraftClonSDZ0331, Elaine Patriarca DraftClonSDZ0238, Martin Whelan DraftClonSDZ0333, Gary Hore DraftClonSDZ0309, Kim O Halloran DraftClonSDZ0262, Joseph Dolan DraftClonSDZ0264, Christine Broderick DraftClonSDZ0266, Steven Abbey DraftClonSDZ0312, Tina Mc Garry DraftClonSDZ0054, Celine Dunning DraftClonSDZ0200, Lisa Murtagh DraftClonSDZ0278, Liam Swan DraftClonSDZ0347, Una Mullaney DraftClonSDZ0206, Sean Smith DraftClonSDZ0393, Ronan Burke DraftClonSDZ0396, Emer Lynch DraftClonSDZ0397, Marta Isopo DraftClonSDZ0363, Marta Estalayo DraftClonSDZ0370, Shirley Clarke DraftClonSDZ0279, Lisa Fitzpatrick DraftClonSDZ0280, John Egan DraftClonSDZ0367, ciaran daly DraftClonSDZ0401, Joyce Dolan DraftClonSDZ0403, Kerrie Walsh DraftClonSDZ0369, Patricia Dunphy <u>DraftClonSDZ0356</u>, <u>Peter Flynn DraftClonSDZ0359</u>, <u>Denis Twohig</u>, <u>Westbury Court Residents</u> Association DraftClonSDZ0110, Maria Smith DraftClonSDZ0263, Eilís Slattery DraftClonSDZ0375, Anita Fletcher DraftClonSDZ0376, Marie Fitzpatrick DraftClonSDZ0378, Patrick Tully DraftClonSDZ0413, Tania Daly DraftClonSDZ0414, Fiona Moriarty DraftClonSDZ0417, Siobhan Donnelly DraftClonSDZ0420, Ian Lamon DraftClonSDZ0432, Sara <u>Lemos DraftClonSDZ0056</u>, Elizabeth Grace <u>DraftClonSDZ0143</u>, colm grogan <u>DraftClonSDZ0470, Stephen O'Brien</u> <u>DraftClonSDZ0475, Stephanie Fleming</u> DraftClonSDZ0474, Conor Smith DraftClonSDZ0473, Mark O'Byrne DraftClonSDZ0472, Mark Brennan DraftClonSDZ0431, Andrew Shinnick DraftClonSDZ0467, Gavin Byrne <u>DraftClonSDZ0468, Jack Byrne</u> <u>DraftClonSDZ0469, Richard Gleeson</u> <u>DraftClonSDZ0183, karen</u> hayes DraftClonSDZ0433, Ciara Reidy DraftClonSDZ0435, Tilly Reidy DraftClonSDZ0186,





Nicola Kennedy DraftClonSDZ0438, Des Delaney DraftClonSDZ0189, mark reid DraftClonSDZ0476, Lynne Cosgrave DraftClonSDZ0441, Liam Reidy DraftClonSDZ0477, Sarah Gill DraftClonSDZ0478, Muhammad Ali DraftClonSDZ0479, Anna Wezyu DraftClonSDZ0480, Gill Devereux DraftClonSDZ0471, Michael Clarke DraftClonSDZ0450, Cherie Lynch DraftClonSDZ0449, Marian Spollen DraftClonSDZ0448, Declan Cotter DraftClonSDZ0225, Sarah Moroney DraftClonSDZ0447, Aine O'Sullivan DraftClonSDZ0444, Adrian Reidy DraftClonSDZ0445, Nuala Reidy DraftClonSDZ0443, Grace Lombard DraftClonSDZ0446, Elaine Collins DraftClonSDZ0439, Veronica O'Callaghan DraftClonSDZ0339, Harry Lee DraftClonSDZ0436, Mr Naheed DraftClonSDZ0437, Eoin Cullen DraftClonSDZ0257, Deirdre McIntyre DraftClonSDZ0294, Kenny Doyle DraftClonSDZ0297, Celine Kiernan <u>DraftClonSDZ0298</u>, <u>Laura Spencer DraftClonSDZ0299</u>, <u>Sharon Cleary DraftClonSDZ0236</u>, <u>ISO</u> Solutions Ireland, ISO Solutions Ireland DraftClonSDZ0322, Catherine Brady DraftClonSDZ0434, Nathaniel Doyle DraftClonSDZ0491, Wayne Quinn DraftClonSDZ0390, Tom Fitzpatrick DraftClonSDZ0421, Lesley Keogh DraftClonSDZ0422, Jonathan Mercier DraftClonSDZ0424, John Coleman DraftClonSDZ0425, Sinead Hall DraftClonSDZ0426, Breeda De Vines DraftClonSDZ0427, Ciara Weafer DraftClonSDZ0428, Helena Doyle DraftClonSDZ0429, Edelle Boles DraftClonSDZ0430, Ashleigh D'Arcy DraftClonSDZ0451, K E Fendic DraftClonSDZ0452, Leighanne Spollen DraftClonSDZ0453, Skirmante Doda DraftClonSDZ0454, Sean Shortt DraftClonSDZ0527, Laura Gaughan DraftClonSDZ0528, Bernard Gaughan DraftClonSDZ0519, Mr or Mrs Carew DraftClonSDZ0529, Leigh Ann Gilmore DraftClonSDZ0535, Aileen Blackwell Kelly DraftClonSDZ0525, Dermot McGreal DraftClonSDZ0540, John McGivney, Finnstown Abbey Residents Association DraftClonSDZ0541, Mags Phelan DraftClonSDZ0542, Ciara McHugh DraftClonSDZ0543, Terence Phelan DraftClonSDZ0544, Martina Magee DraftClonSDZ0545, Geoff Grice DraftClonSDZ0546, Sandra Coleman DraftClonSDZ0547, Harry Lee, Larkfield Residents Association DraftClonSDZ0548, Ciaran & Amanda O'Rourke DraftClonSDZ0549, Sheena Bolger DraftClonSDZ0550, Cian Fleming DraftClonSDZ0559, Brian McKenna DraftClonSDZ0565, Jennifer McKenna DraftClonSDZ0483, Nuno Limos DraftClonSDZ0485, Grace Quinn DraftClonSDZ0487, Liam Canty DraftClonSDZ0489, Sarah Walsh DraftClonSDZ0484, Liam Lynch DraftClonSDZ0482, Jason Shanley DraftClonSDZ0517, Niall and Sandra Harrington DraftClonSDZ0486, Brian Kennedy DraftClonSDZ0488, Michaela Larsson DraftClonSDZ0490, Elaine McManamly)

- 5. Submission outlines that Adamstown is only at Phase 2 and that Lucan is under huge pressure trying to absorb the extra volumes from Adamstown. Clonburris should wait until Adamstown in complete for 5 years. (<u>DraftClonSDZ0043</u>, <u>Jeanine Nolan</u>)
- 6. Submission on behalf of residents association advises that Adamstown should be completed before Clonburris commences and that issues encountered should be considered. (DraftClonSDZ0242, Deirdre Nolan, Cappaghmore Residents Group)
- 7. Submission on behalf of Clondalkin community group makes reference to the completion of Adamstown and its use as a model for development. (<u>DraftClonSDZ0246</u>, <u>George Graham</u>, <u>Westbourne Community Group</u>)
- 8. Lucan resident indicates that Adamstown needs to be completed first in order to assess impacts on the area. (<u>DraftClonSDZ0281, Pamela Dunne</u>)
- 9. The Adamstown SDZ is not finished, will the development of the Clonburris SDZ result in the same problems. (<u>DraftClonSDZ0052</u>, <u>Lynda Curtis</u>)
- 10. Concern is raised as to why a new SDZ is being proposed when the Adamstown SDZ is not complete and has not delivered any of the amenities that were proposed in the original plans. (<u>DraftClonSDZ0053</u>, <u>Michael McCabe</u>)
- 11. Submission from Lucan resident and Principal of Adamstown Castle ETNS raises issues in relation to Adamstown and includes suggestions in relation to survey/evaluation of Adamstown. (DraftClonSDZ0313, Tom Moriarty)





- 12. Submission requests that Adamstown be completed first and then see if there is any hope that the area can survive additional development, because it is a matter of survival. (DraftClonSDZ0402, Anna O'Neill)
- 13. Until Adamstown is completed and the effects of this development on the existing community is known, then another SDZ should not be started. No other area in Ireland is expected to have 2 new towns on their doorstep without any thought for infrastructure or lack of facilities in the existing community. (DraftClonSDZ0334, Gerard Griffin)
- 14. Submission from Adamstown resident objects to zoning/development of Clonburris on basing of phasing/timing, and completion of Adamstown. (DraftClonSDZ0357, <a href="https://deena.google.com/meena.googl
- 15. No development should take place until Adamstown has been fully completed including transport infrastructure and leisure facilities. (<u>DraftClonSDZ0398</u>, <u>Andrew Carton</u>)
- 16. The Adamstown SDZ is a prime example of a development promising so much and delivering so little. What structures or assurances will be put in place to avoid this from happening again?
 - Clonburris seems over-zealous based on the impacts of Adamstown only beginning to show in terms of traffic chaos, school space issues and development without facilities. (DraftClonSDZ0221, Elaine Hurley)
- 17. Adamstown SDZ has put a strain on Lucan and supports promised have not been completed to date. (<u>DraftClonSDZ0229</u>, <u>lisa rodgers</u>)
- 18. Concern is expressed that Clonburris is being developed at a time when the Adamstown SDZ has not yet been completed and full traffic impacts are not known. (<u>DraftClonSDZ0251</u>, Amanda O'Sullivan)
- 19. Queries whether an impact study of Adamstown now that building has recommenced 10 years after the downturn has been carried out. (<u>DraftClonSDZ0304, PAULINE KEOGH</u>)
- 20. The Adamstown SDZ should be completed before new homes are built at Clonburris. There is also no green area provided to date at Adamstown. (<u>DraftClonSDZ0292</u>, <u>Mary Dwyer</u>)
- 21. No more than 1,000 houses concurrent with Adamstown (to allow for a smooth transition of construction work and employment, but not a planning free for all) should be allowed. (DraftClonSDZ0332, Paul Gogarty)
- 22. Adamstown should be completed before Clonburris commences (<u>DraftClonSDZ0499</u>, <u>Deirdre Nolan</u>)
- 23. The Adamstown and Clonburris SDZs should be staggered. (<u>DraftClonSDZ0536</u>, <u>Michael Jennings DraftClonSDZ0531</u>, <u>Adrienne O'Driscoll DraftClonSDZ0532</u>, <u>Ciaran O'Driscoll</u>)
- 24. The Adamstown SDZ is only 25% complete and 8,000 new homes at Clonburris should not happen until the remaining homes at Adamstown are built. Facilities proposed at Adamstown have not materialised to date, this SDZ should be finished and demonstrated as a good place to live. (DraftClonSDZ0387, Owen Meade)
- 25. Development at Clonburris SDZ is premature as the Adamstown SDZ is still to be fully developed and there should not be two SDZs located together. (DraftClonSDZ0514, The Tracey Family)
- 26. The Clonburris SDZ should not proceed until the Adamstown SDZ is completed and its impact known. Also the expected levels of infrastructure at Adamstown have not been delivered to date. (DraftClonSDZ0511, Julie Kearns)
- 27. The original delivery period of Adamstown SDZ has been well extended at this stage, which means that the entire delivery of Adamstown SDZ will not be complete at least for another 10 15 years. This means measuring the success/failure of the concept of SDZ cannot be undertaken in the near future. (DraftClonSDZ0386, Kinga Drozdz)

Clonburris



Chief Executive's Response

A number of issues were raised as part of the 606 submissions received that the Chief Executive considers to be outside the scope of the Draft Planning Scheme. The Chief Executive acknowledges the issues raised referring to Adamstown. Adamstown and Clonburris are Strategic Development Zones, designated by the Government. The Chief Executive considers that the SDZs are independent of each other in terms of their boundary and have individual statutory processes to make a Planning Scheme. Both SDZs form key parts of the Core Strategy of the County Development Plan 2016-2022 and the delivery of housing in the County. Having regard to the above context and noting the anticipated medium term build out, it is considered that the Adamstown and Clonburris Planning Schemes should not be staggered or limited based on each other.

Anti-social Behaviour

- 1. There is a concern for increase in anti-social behaviour problems due to increase in population in the area.
 - The area will be a rat-run for scrambler bikes, which is an existing problem. A concern is raised about the proposed lake as it will attract anti-social behaviour by people, scramblers and horses drinking from it. (<u>DraftClonSDZ0023</u>, <u>sean gillen</u>)
- 2. Anti-social behaviour is experienced at present due to people climbing the existing wall that it is proposed to open up. Burglaries are rampant, property being stolen from cars and sheds, and delivery drivers are being robbed at knifepoint.
 Concern is raised over quad bikes and scramblers being driven down the main roads in the Foxborough estate. These are coming from Foxdene and Meile an Ri, opening up existing cul-de-sacs will put children's safety at risk. (DraftClonSDZ0030, Gary Jones)
- 3. Antisocial behaviour is a problem in the area and not enough is being done to address it, increased Garda patrolling and resources are needed. (<u>DraftClonSDZ0052</u>, <u>Lynda Curtis</u>)
- There is a marked increase in crime and antisocial behaviour and the Gardaí seem under resourced to manage the current population, let alone a massively increased one. (<u>DraftClonSDZ0221</u>, <u>Elaine Hurley</u>)
- Antisocial behaviour problems i.e. joyriding, animal cruelty and illegal dumping in the surrounding areas should be addressed before the development starts. (<u>DraftClonSDZ0505</u>, <u>Paula Kelly</u>)
- 6. Anti-social behaviour in the area is expected to increase in association with lack of facilities for teenagers in the area. (<u>DraftClonSDZ0511</u>, <u>Julie Kearns</u>)

Chief Executive's Response

A number of issues were raised as part of the 606 submissions received that the Chief Executive considers to be outside the scope of the Draft Planning Scheme. The Chief Executive acknowledges the issues raised. In relation to issues raised referring to anti-social behaviour and the wider Lucan and Clondalkin area, it is considered that the issues are not matters for this statutory consultation process on the Draft Planning Scheme.

Miscellaneous

- 1. No text included with the submission. (DraftClonSDZ0024, oh hujio0)
- 2. Test submission with no content in relation to Planning Scheme. (<u>DraftClonSDZ0013</u>, <u>Denise</u> Mary Byrne)
- 3. Issues raised in relation to the policing of parking on Ashwood Road. (<u>DraftClonSDZ0015, Eva Bowden wade</u>)

Clonburris



- Submission relates to control of horses and Clondalkin Equine Centre. (<u>DraftClonSDZ0018</u>, Fiona Fitzgerald)
- 5. The draft planning scheme states that charging points for electric vehicles will be provided, however there is no plan to provide such facilities for existing residents. (DraftClonSDZ0073, Jim Houlihan DraftClonSDZ0111, Lucan Residents, Clonburris Lucan Action Group DraftClonSDZ0098, Declan Donnelly DraftClonSDZ0159, Paula McMahon DraftClonSDZ0166, Andrew Mowatt DraftClonSDZ0044, Neil Nolan DraftClonSDZ0215, Graham Walsh DraftClonSDZ0218, helen Nix DraftClonSDZ0107, Peter Corby, Griffeen Glen Residents Association DraftClonSDZ0219, Donncha Cleary DraftClonSDZ0220, Joe McDermott DraftClonSDZ0237, Hugh McSweeney DraftClonSDZ0255, James Haughton <u>DraftClonSDZ0192, Brian O'Neill DraftClonSDZ0245, Stephen Murphy DraftClonSDZ0193, Kim</u> Rice DraftClonSDZ0194, Brian Shortall DraftClonSDZ0235, Edina Almasi DraftClonSDZ0196, Andrea Panikova DraftClonSDZ0197, Damian McKillop DraftClonSDZ0231, Jennifer Winters DraftClonSDZ0198, Aine McKinlay DraftClonSDZ0267, Niamh Brennan DraftClonSDZ0265, Ian McLean DraftClonSDZ0248, Caroline O'Brien DraftClonSDZ0284, Evelyn Smyth DraftClonSDZ0285, Carol Hogg DraftClonSDZ0290, Agnes Maher DraftClonSDZ0331, Elaine Patriarca DraftClonSDZ0238, Martin Whelan DraftClonSDZ0333, Gary Hore DraftClonSDZ0309, Kim O Halloran DraftClonSDZ0262, Joseph Dolan DraftClonSDZ0264, Christine Broderick DraftClonSDZ0266, Steven Abbey DraftClonSDZ0312, Tina Mc Garry <u>DraftClonSDZ0054, Celine Dunning DraftClonSDZ0200, Lisa Murtagh DraftClonSDZ0278, Liam</u> Swan DraftClonSDZ0347, Una Mullaney DraftClonSDZ0206, Sean Smith DraftClonSDZ0319, renata escobar DraftClonSDZ0393, Ronan Burke DraftClonSDZ0396, Emer Lynch DraftClonSDZ0397, Marta Isopo DraftClonSDZ0363, Marta Estalayo DraftClonSDZ0279, Lisa Fitzpatrick DraftClonSDZ0280, John Egan DraftClonSDZ0367, ciaran daly DraftClonSDZ0401, Joyce Dolan DraftClonSDZ0403, Kerrie Walsh DraftClonSDZ0356, Peter Flynn DraftClonSDZ0359, Denis Twohig, Westbury Court Residents Association DraftClonSDZ0110, Maria Smith DraftClonSDZ0375, Anita Fletcher DraftClonSDZ0263, Eilís Slattery DraftClonSDZ0376, Marie Fitzpatrick DraftClonSDZ0378, Patrick Tully DraftClonSDZ0413, Tania Daly DraftClonSDZ0432, Sara Lemos DraftClonSDZ0143, colm grogan DraftClonSDZ0472, Mark Brennan DraftClonSDZ0431, Andrew Shinnick DraftClonSDZ0183, karen hayes DraftClonSDZ0433, Ciara Reidy DraftClonSDZ0435, Tilly Reidy DraftClonSDZ0186, Nicola Kennedy DraftClonSDZ0438, Des Delaney DraftClonSDZ0189, mark reid DraftClonSDZ0476, Lynne Cosgrave DraftClonSDZ0441, Liam Reidy DraftClonSDZ0477, Sarah Gill DraftClonSDZ0478, Muhammad Ali DraftClonSDZ0479, Anna Wezyu DraftClonSDZ0480, Gill Devereux DraftClonSDZ0450, Cherie Lynch DraftClonSDZ0449, Marian Spollen DraftClonSDZ0225, Sarah Moroney DraftClonSDZ0448, Declan Cotter DraftClonSDZ0447, Aine O'Sullivan DraftClonSDZ0444, Adrian Reidy DraftClonSDZ0445, Nuala Reidy DraftClonSDZ0257, Deirdre McIntyre DraftClonSDZ0294, Kenny Doyle DraftClonSDZ0297, Celine Kiernan DraftClonSDZ0298, Laura Spencer DraftClonSDZ0299, Sharon Cleary DraftClonSDZ0322, Catherine Brady DraftClonSDZ0491, Wayne Quinn DraftClonSDZ0390, Tom Fitzpatrick DraftClonSDZ0421, Lesley Keogh DraftClonSDZ0422, Jonathan Mercier DraftClonSDZ0425, Sinead Hall DraftClonSDZ0426, Breeda De Vines DraftClonSDZ0427, Ciara Weafer DraftClonSDZ0428, Helena Doyle DraftClonSDZ0429, Edelle Boles DraftClonSDZ0430, Ashleigh D'Arcy DraftClonSDZ0454, Sean Shortt DraftClonSDZ0527, Laura Gaughan DraftClonSDZ0528, Bernard Gaughan DraftClonSDZ0525, Dermot McGreal DraftClonSDZ0541, Mags Phelan DraftClonSDZ0542, Ciara McHugh DraftClonSDZ0543, Terence Phelan DraftClonSDZ0544, Martina Magee DraftClonSDZ0545, Geoff Grice <u>DraftClonSDZ0483, Nuno Limos</u> <u>DraftClonSDZ0485, Grace Quinn</u> <u>DraftClonSDZ</u>0487, Liam Canty DraftClonSDZ0489, Sarah Walsh DraftClonSDZ0484, Liam Lynch DraftClonSDZ0482, Jason Shanley DraftClonSDZ0517, Niall and Sandra Harrington DraftClonSDZ0486, Brian Kennedy DraftClonSDZ0488, Michaela Larsson DraftClonSDZ0490, Elaine McManamly)





- 6. Clondalkin resident highlights concerns in relation to the cutting of grass along the canal. (DraftClonSDZ0287, Catherine Bennett)
- 7. Concerns raised in relation to pest control. (DraftClonSDZ0290, Agnes Maher)
- 8. Submission from Lucan resident and Principal of Adamstown makes reference to monitoring of applications outside SDZ land; highlights concerns in relation to enrolment and segregation in the education system and makes suggestions in relation to use of school facilities after hours. Concerns are also raised in relation previous planning in Lucan and Clondalkin and traffic implications. (DraftClonSDZ0313, Tom Moriarty)
- 9. Submission from resident of Ashwood requests the construction of a wall at Bawnogue Road to make area safer, alleviate traffic noise and block the resident's view of the illegal dumping (DraftClonSDZ0274, Stephen Daly)
- 10. Submission received refers to an attached letter. No attachment sourced. (DraftClonSDZ0341, Muhammad Anwar Malik, Ahmadiyya Muslim Association)
- 11. Submission outlines concerns about the jobs that will be created in the new community areas will not be high paid and are unlikely to support new families to the area. People will need jobs outside the area and will need to commute. (<a href="https://prescription.org/legs/bases
- 12. Submission from Clondalkin resident notes the provisions of the Planning Scheme for a primary health care centre and includes a suggestion in relation to blood tests. (DraftClonSDZ0358, Eoin Ó Broin)
- 13. Attachment included in another submission from Maria Smith DraftClonSDZ0110 CVQ855 (DraftClonSDZ0108, Maria Smith)
- 14. Crèche operator acknowledges the childcare provision under the Planning Scheme and declares an interest in operating one or more planned crèches. (<u>DraftClonSDZ0380</u>, <u>Ingrid Mc Donnell</u>, <u>Mrs Giggles</u>)
- 15. Concern is raised that another economic downturn could result in Clonburris becoming a ghost estate. (<u>DraftClonSDZ0258</u>, <u>Robert McNeill</u>)
- 16. Submission from South Dublin County Disability Advisory and Consultative Panel outlines recommendations for public documents/ videos relating to the Clonburris SDZ (DraftClonSDZ0503, Selina Bonnie)
- 17. There is a large demand for social and affordable housing in the Clondalkin and Lucan areas for the thousands of people on the social housing list, and we need affordable housing for those who want to buy their own home but can't get a mortgage. As of the 3rd November 2017 approximately two thirds of homes for sale on daft.ie in the Dublin region are priced in excess of €300 000. There is no reason to build any homes over €300 000 in the SDZ, and as such all homes will be 'affordable' according the government's definition. There should also be a consideration given to the possibility of council developed affordable housing. (DraftClonSDZ0308, Madeleine Johansson, People Before Profit)
- 18. It will not be sustainable for people from Clonburris to end up working on the M50 belt. (DraftClonSDZ0434, Nathaniel Doyle)
- 19. Griffeen shopping centre cannot be expected to accommodate construction traffic and builders for lunch during construction. (<u>DraftClonSDZ0434</u>, <u>Nathaniel Doyle</u>)
- 20. Submission from CTDG requests that all new developments will be developed in consultation with the community and local Traveller development groups. (<u>DraftClonSDZ0512, Stephen Browne, Clondalkin Travellers Development Group</u>)
- 21. Housing should have funded building inspections to avoid a recurrence of Priory Hall and similar developments. (<u>DraftClonSDZ0504</u>, <u>South Dublin County PPN</u>, <u>South Dublin County Public Participation Network</u>)
- Submission outlines development of other green belts owned by Dublin City Council should be used instead of Tallaght and Clondalkin.
 (DraftClonSDZ0560, Sandra McLoughlin DraftClonSDZ0561, Tara Jenkins DraftClonSDZ0562,





- <u>John McLoughlin DraftClonSDZ0563, Tracey Boland DraftClonSDZ0602, Catherine Scanlon DraftClonSDZ0603, Vincent Scanlon</u>)
- 23. A question is raised as to whether local people will be employed in the construction of the SDZ. (<u>DraftClonSDZ0515</u>, <u>Christopher Conway</u>)
- 24. Sinn Fein submission states that development of this site must provide a real jobs dividend for the local community.
 - (DraftClonSDZ0383, Eoin Ó Broin TD, Cllr Danny O'Brien & Cllr Mark Ward)

Chief Executive's Response

A number of issues were raised as part of the 606 submissions received that the Chief Executive considers to be outside the scope of the Draft Planning Scheme. The Chief Executive acknowledges the issues raised. In relation to issues above, it is considered that a number of issues should be raised during the delivery of other Council functions and are not matters for this statutory consultation process on the Draft Planning Scheme. Furthermore, a range of issues relate to the day to day operation of the Council, such as maintenance, and should be raised through customer care and are not matters for this statutory consultation process on the Draft Planning Scheme.

Procedural Issues

- Submission from CIE requests that they be notified of planning applications and changes in relation to Protected Structures. (<u>DraftClonSDZ0295</u>, <u>Aidan Ruane</u>, <u>CIE Group Property</u> <u>Management DraftClonSDZ0346</u>, <u>Aidan Ruane</u>, <u>CIE Group Property Management</u>)
- 2. Potential new permeability links to/from existing residential estates which may involve the opening or removal of existing boundary walls should be only be proposed and pursued by way of Part 8 public consultation and planning consent process. (DraftClonSDZ0204, William Lavelle)
- Submission outlines that the social housing in the development should be offered to the people of the area first before opening it up to the entire country. (<u>DraftClonSDZ0275</u>, <u>Rachel Kavanagh</u>)
- 4. Consultation with planning experts from Belgium and Holland should take place before undertaking any projects and spending valuable taxpayer money. (<u>DraftClonSDZ0394</u>, Richard Daly)
- 5. This is a repeat submission of DraftClonSDZ0224 / CVQ610 (<u>DraftClonSDZ0226</u>, <u>Valerie Mcneill</u>)
- 6. Whilst submission relates to Section 2.7 Community Facilities, no text has been included. (DraftClonSDZ0321, najiya kiran)
- 7. Whilst submission relates to Section 2.7 Community Facilities, no text has been included. (DraftClonSDZ0323, najiya kiran)
- 8. Whilst submission relates to Section 2.7 Community Facilities, no text has been included. (DraftClonSDZ0324, najiya kiran)
- 9. Whilst submission is submitted under Section 2.7 Community Facilities, no text has been included. (<u>DraftClonSDZ0326</u>, najiya kiran)
- 10. The planning process in Ireland is unsatisfactory particularly in relation to land ownership, powers of local government, market driven approach and recommends significant change in legislation. (DraftClonSDZ0308, Madeleine Johansson, People Before Profit)
- 11. Requests amendment of description of protected structures in the CDP to include Clonburris Great townland as part of address. (<u>DraftClonSDZ0606</u>, <u>Sandra Scully</u>)
- 12. Concern is raised with regard to the amount of time the public had to make submissions and when they first heard about the public consultation submission dates. (DraftClonSDZ0515, Christopher Conway)





13. Concern is raised with regard to the public consultation period and when notification was received by residents in the Ashwood residential estate. (DraftClonSDZ0514, The Tracey Family)

Chief Executive's Response

A number of issues were raised as part of the 606 submissions received that the Chief Executive considers to be outside the scope of the Draft Planning Scheme. The Chief Executive acknowledges the issues raised.

Wider Issues on Transport

- 1. Traffic is a problem, submitter works a mere 11 minutes from Lucan but some mornings it could take up to an hour to get there. I have tried getting the bus on separate occasions only to have many pass me by as they were full to the brim. (DraftClonSDZ0002, DraftClonSDZ00035, Stephen Murray)
- 2. The issue relates to traffic safety and the lack of speed ramps in Hayden's Park Green, Lucan (<u>DraftClonSDZ0037</u>, <u>Darren Johnson</u>)
- 3. The issue raised concerns in relation to existing congestion in the area caused by too many traffic lights, roundabouts and not enough laybys for buses (DraftClonSDZ0037, Darren Johnson)
- 4. It is noted that the plans do not include a new bus corridor to the City Centre.

 (<u>DraftClonSDZ0040</u>, <u>Foxborough Residents Group Lucan</u>, <u>Foxborough Residents Group</u>)
- Lucan resident highlights concerns in relation to future traffic growth in Lucan by reason of drivers eluding M50 tolls, bus services in Lucan, lack of bus or DART/train services in Lucan and distance between Adamstown Train Station and Lucan. (<u>DraftClonSDZ0174, Peter</u> Klasovity)
- 6. Lucan resident highlights concern in relation to the absence of a proposal for a bridge over the River Liffey and the lack of consideration in relation to the location of the M50 toll including the associated traffic generated in Lucan. (<u>DraftClonSDZ0217</u>, <u>Frank Hynes</u>)
- There is insufficient public transport serving the Lucan/Clondalkin area for people who do
 not work in the City Centre in particular routes to Tallaght and Citywest (<u>DraftClonSDZ0113</u>,
 CATHERINE GEOGHEGAN)
- 8. Difficulty with encouraging people to use public transport. (<u>DraftClonSDZ0240, Beatriz</u> Martinez)
- 9. There is existing high levels of traffic in Lucan and an excessive demand on public transport. (DraftClonSDZ0270, Joan Johnson)
- 10. There is a lack of proper transport, the train station at Adamstown is located too far away for people living in Lucan.
 - The Lucan Luas as promised is now needed in the area.
 - The existing bus service is a disgrace, including the 25A and 25B services, as both services essentially follow the same route. A more direct bus route into the city centre is required. (DraftClonSDZ0052, Lynda Curtis)
- 11. Submission from a resident of Palmerstown Woods outlining that Station Road would be a key route from Clonburris to Park West, Palmerstown and the City. Despite consultations in 2002 to introduce a cycle route along the road and Cloverhill Road this has not materialised and the new railway bridges were built without any cycle ways. Station Road is currently very busy around school times and at rush hours, it is difficult to see how it can be improved. (DraftClonSDZ0272, Andy Lane)
- 12. Submission outlines that the County Development Plan still has the possibility of opening up junction 8 on the M50 which was the beginning of the Naas Motorway, that has never

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- materialised. Is this back on the agenda, although recent housing developments (Milford Manor) would seem to preclude the possibility of this. (DraftClonSDZ0272, Andy Lane)
- 13. Submission outlines that the failure to provide any additional public transport capacity on the 25A/B/X services has resulted in the bus service being completely over-stretched and unable to deal with existing demand in the Lucan area. (<u>DraftClonSDZ0204</u>, <u>William Lavelle</u>)
- 14. The junctions at Woodies onto the N4 including the traffic lights should be sequenced to ensure more volumes of traffic. (<u>DraftClonSDZ0269</u>, <u>Shane Roche</u>)
- 15. Submission from Lucan resident highlights concerns in relation to current traffic congestion (10 15 minute commute on a dry day 8 -9am) and the absence of plans to alleviate the issues. It is requested that current traffic congestion issues in Lucan be dealt with before commencing development. (<u>DraftClonSDZ0360</u>, <u>Josephine Alinquant</u>)
- 16. Submission outlines that the infrastructure for a cycling scheme, such as Dublin Bike Scheme should be incorporated. (<u>DraftClonSDZ0502</u>, <u>Ed O'Brien & John Curran TD</u>, <u>Fianna Fail Dublin Mid West</u>)
- 17. Concerns raised regarding absence of plans to develop infrastructure to meet existing traffic issues prior to construction. (DraftClonSDZ0499, Deirdre Nolan)
- 18. New bus routes must not prioritise the new development ahead of existing communities. The routes suggested in Figure 7.7 (p. 70) Clonburris PT Strategy Measures leave several existing communities in both Lucan and Clondalkin without through services, such as Green Park/Sruleen, Bawnogue and Ballyowen. (DraftClonSDZ0308, Madeleine Johansson, People Before Profit)
- Lucan needs upgrades to roads, a major traffic management plan and the Luas to Lucan to facilitate existing residents daily as the network is past capacity. (<u>DraftClonSDZ0434</u>, <u>Nathaniel Doyle</u>)
- 20. Lucan residents would implore traffic on Griffeen Avenue instead of increasing traffic as Clonburris. It is taking 30-45 minutes to drive 400m to the school. The argument of 'don't drive your children to school' doesn't work in Ireland. (<u>DraftClonSDZ0434</u>, <u>Nathaniel Doyle</u>)
- 21. A footbridge over Griffeen Glen Road would kept the traffic moving on a road that currently has lollipop ladies stopping traffic. (<u>DraftClonSDZ0434</u>, <u>Nathaniel Doyle</u>)
- 22. Transport and transport solutions cannot be dealt with in the hope that people will stay in their own neighbourhood. This is not a desirable or practical outcome because mental health requires physical movement and social interaction on a wider scale. It is suggested that planners view the 1960s/70s TV series called 'The Prisoner' which is an attempt to provide an idyllic community but hived off from the outside world. (DraftClonSDZ0507, Caitriona McClean)
- 23. New developments in adjoining counties, will contribute additional vehicle numbers, all of which will create additional traffic movements on all roads close to this development. The roads adjacent to the development are heavily congested, and even without Clonburris, a solution is need for growing congestion for all areas. (DraftClonSDZ0507, Caitriona McClean)
- 24. The solution to congestion in this area is integrated land use, public transport and a service ring road. A service ring road would allow direct access to commercial activities on this corridor from all the main roads into Dublin. The service ring road would reduce unnecessary traffic on the N4 and N7 and the volume of traffic that short cuts through Lucan South and Lucan Village. (DraftClonSDZ0506, Tom Newton DraftClonSDZ0507, Caitriona McClean)
- 25. There is a need to review the routing of public transport. It is recommended that
 - Create a rail hub at Lucan Adamstown that will link the Luas from Saggart and mainline rail from the Leixlip line.
 - Build a Luas line from Fatima to Stephens Green.
 - Introduce the Quay Bus Contra Flow.

(DraftClonSDZ0506, Tom Newton DraftClonSDZ0507, Caitriona McClean)

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- 26. The N4/N7 Orbital link road from the 2035 GDA Strategy should be brought forward into the GDA Plan 2016-2026. (<u>DraftClonSDZ0536</u>, <u>Michael Jennings DraftClonSDZ0531</u>, <u>Adrienne O'Driscoll DraftClonSDZ0532</u>, Ciaran O'Driscoll)
- 27. The submission also refers to heavy traffic volumes in Clondalkin and lack of adequate public transport. (<u>DraftClonSDZ0524</u>, <u>John Roche DraftClonSDZ0521</u>, <u>Sarah Roche DraftClonSDZ0522</u>, <u>Carol Roche DraftClonSDZ0523</u>, <u>Catherine Roche DraftClonSDZ0551</u>, <u>Michael Roche DraftClonSDZ0552</u>, <u>Ciara Toner DraftClonSDZ0553</u>, <u>Greg Toner DraftClonSDZ0554</u>, <u>Jennifer Toner DraftClonSDZ0555</u>, <u>Bernadette Toner DraftClonSDZ0556</u>, <u>Lorna Toner DraftClonSDZ0557</u>, <u>Martin Toner</u>)
- 28. In the Celbridge Local Area Plan 2017-2023 a new road is proposed to connect to the N4. As this road would pass through the South Dublin County Council area, assistance is sought in assessing and furthering this project. The LAP proposes that this road routes onto the congested R403 and the N4 near Clonburris / Adamstown. The alternative should be to link this road to the Grange Ring Road R136, which would take commuters away from the N4. Dublin bus should provide a service from Celbridge, to the N7 and Tallaght. No service currently exists for a population of 25,000 people. (DraftClonSDZ0513, Brian Nolan)
- 29. The Lucan area needs a LUAS to connect from Heuston Station to the N4 or N7 areas. (DraftClonSDZ0511, Julie Kearns)
- 30. A foot bridge over Griffeen Glen Avenue would keep traffic moving on a road that currently has lollipop staff stopping traffic, this would also connect to the school. (<u>DraftClonSDZ0511</u>, <u>Julie Kearns</u>)
- 31. Light Rail: Submitter assumes this is the Luas Line F proposed route which has been on the shelf for the past number of years and the final route around Lucan had not been agreed, notwithstanding this none of the route goes close to Clonburris. Also questions the decision of Government to remove Metro West. (<u>DraftClonSDZ0272</u>, Andy Lane)

Chief Executive's Response

A number of issues were raised as part of the 606 submissions received that the Chief Executive considers to be outside the scope and powers of the Draft Planning Scheme or the Draft Planning Scheme Lands. The Chief Executive acknowledges the issues raised. In relation to issues raised referring to local and wider transport issues, it is considered that a number of these concerns are outside the scope of the Draft Planning Scheme in terms of location, perceptions on transport and transport issues not directly related to Clonburris. Many of the wider concerns relate to the functions and strategies of transport authorities and transport service providers. Some of the local roads issues and the wider medium to long terms road schemes raised relate to capital programmes and plans associated with the County Development Plan.

Wider Issues on Community Facilities, Infrastructure and Amenities

- Request to consider developing Fire Station in Adamstown. (<u>DraftClonSDZ0011</u>, <u>David Greville</u>)
- 2. Lack of proper planning, amenities and inadequate infrastructure is detrimental to the struggling population of Lucan. Infrastructure is already pushed to the limit with main areas of concern being the Newcastle Road, Lucan Village, the N4 and Esker Drive but to name a few. (DraftClonSDZ0002, Kellie Curran)
- Submission implores people to use some common sense here, Lucan is already over populated, supply what we need now before adding 20k new people into the area. (<u>DraftClonSDZ0007</u>, <u>Jennifer Byrne</u>)





- 4. The submission notes that the population of Lucan, (45,000) has no proper community centre. (<u>DraftClonSDZ0040</u>, <u>Foxborough Residents Group Lucan</u>, <u>Foxborough Residents Group</u>)
- 5. Submission from resident in foxborough outlining that the existing road is noisy and that the proposal to put 8000 houses with more cars is going to impact on noise pollution to our house and the volume of traffic at school times is so busy and dangerous that the kids can't cycle to school. Moyglas and other estates have a wooden fence on the perimeter of the road for sound but for some reason foxborough has none. This means our house is noisy the walls are left unfinished. (DraftClonSDZ0042, Joanne Flynn)
- 6. Concern raised include residents of the planning scheme using existing retail, open space and community facilities in Lucan by reason of the lack of community facilities for existing communities, existing traffic congestion and appropriateness of proposed open space in terms of flood risk. (DraftClonSDZ0073, Jim Houlihan DraftClonSDZ0111, Lucan Residents, Clonburris Lucan Action Group DraftClonSDZ0098, Declan Donnelly DraftClonSDZ0159, Paula McMahon DraftClonSDZ0099, Tanya McDonald Donnelly DraftClonSDZ0171, A Fahy DraftClonSDZ0173, Lisa Greene DraftClonSDZ0166, Andrew Mowatt DraftClonSDZ0044, Neil Nolan DraftClonSDZ0180, Rupert Fuller DraftClonSDZ0215, Graham Walsh DraftClonSDZ0218, helen Nix DraftClonSDZ0107, Peter Corby, Griffeen Glen Residents Association DraftClonSDZ0219, Donncha Cleary DraftClonSDZ0220, Joe McDermott <u>DraftClonSDZ0237, Hugh McSweeney DraftClonSDZ0255, James Haughton</u> DraftClonSDZ0192, Brian O'Neill DraftClonSDZ0245, Stephen Murphy DraftClonSDZ0193, Kim Rice DraftClonSDZ0194, Brian Shortall DraftClonSDZ0235, Edina Almasi DraftClonSDZ0196, Andrea Panikova DraftClonSDZ0197, Damian McKillop DraftClonSDZ0231, Jennifer Winters DraftClonSDZ0198, Aine McKinlay DraftClonSDZ0267, Niamh Brennan DraftClonSDZ0265, Ian McLean DraftClonSDZ0248, Caroline O'Brien DraftClonSDZ0284, Evelyn Smyth DraftClonSDZ0285, Carol Hogg DraftClonSDZ0290, Agnes Maher DraftClonSDZ0331, Elaine Patriarca DraftClonSDZ0238, Martin Whelan DraftClonSDZ0333, Gary Hore DraftClonSDZ0309, Kim O Halloran DraftClonSDZ0262, Joseph Dolan DraftClonSDZ0264, Christine Broderick DraftClonSDZ0266, Steven Abbey DraftClonSDZ0312, Tina Mc Garry DraftClonSDZ0054, Celine Dunning DraftClonSDZ0200, Lisa Murtagh DraftClonSDZ0206, Sean Smith DraftClonSDZ0278, Liam Swan DraftClonSDZ0347, Una Mullaney DraftClonSDZ0191, Rafal Marzec DraftClonSDZ0319, renata escobar DraftClonSDZ0393, Ronan Burke DraftClonSDZ0396, Emer Lynch DraftClonSDZ0397, Marta Isopo DraftClonSDZ0363, Marta Estalayo DraftClonSDZ0279, Lisa Fitzpatrick DraftClonSDZ0280, John Egan DraftClonSDZ0367, ciaran daly DraftClonSDZ0401, Joyce Dolan DraftClonSDZ0403, Kerrie Walsh DraftClonSDZ0356, Peter Flynn DraftClonSDZ0359, Denis Twohig, Westbury Court Residents Association DraftClonSDZ0110, Maria Smith DraftClonSDZ0263, Eilís Slattery DraftClonSDZ0376, Marie Fitzpatrick DraftClonSDZ0378, Patrick Tully DraftClonSDZ0413, Tania Daly DraftClonSDZ0414, Fiona Moriarty DraftClonSDZ0417, Siobhan Donnelly DraftClonSDZ0420, Ian Lamon DraftClonSDZ0432, Sara Lemos DraftClonSDZ0056, Elizabeth Grace DraftClonSDZ0143, colm grogan DraftClonSDZ0472, Mark Brennan DraftClonSDZ0431, Andrew Shinnick DraftClonSDZ0183, karen hayes DraftClonSDZ0433, Ciara Reidy DraftClonSDZ0435, Tilly Reidy DraftClonSDZ0186, Nicola Kennedy DraftClonSDZ0438, Des Delaney DraftClonSDZ0189, mark reid DraftClonSDZ0476, Lynne Cosgrave <u>DraftClonSDZ0441, Liam Reidy DraftClonSDZ0477, Sarah Gill DraftClonSDZ0478, Muhammad</u> Ali DraftClonSDZ0479, Anna Wezyu DraftClonSDZ0480, Gill Devereux DraftClonSDZ0450, Cherie Lynch DraftClonSDZ0449, Marian Spollen DraftClonSDZ0225, Sarah Moroney DraftClonSDZ0448, Declan Cotter DraftClonSDZ0447, Aine O'Sullivan DraftClonSDZ0444, Adrian Reidy DraftClonSDZ0445, Nuala Reidy DraftClonSDZ0257, Deirdre McIntyre DraftClonSDZ0294, Kenny Doyle DraftClonSDZ0297, Celine Kiernan DraftClonSDZ0298, Laura Spencer DraftClonSDZ0299, Sharon Cleary DraftClonSDZ0236, ISO Solutions Ireland, ISO





Solutions Ireland DraftClonSDZ0322, Catherine Brady DraftClonSDZ0434, Nathaniel Doyle DraftClonSDZ0491, Wayne Quinn DraftClonSDZ0390, Tom Fitzpatrick DraftClonSDZ0421, Lesley Keogh DraftClonSDZ0422, Jonathan Mercier DraftClonSDZ0425, Sinead Hall DraftClonSDZ0426, Breeda De Vines DraftClonSDZ0427, Ciara Weafer DraftClonSDZ0428, Helena Doyle DraftClonSDZ0429, Edelle Boles DraftClonSDZ0430, Ashleigh D'Arcy DraftClonSDZ0451, K E Fendic DraftClonSDZ0452, Leighanne Spollen DraftClonSDZ0453, Skirmante Doda DraftClonSDZ0454, Sean Shortt DraftClonSDZ0527, Laura Gaughan DraftClonSDZ0528, Bernard Gaughan DraftClonSDZ0525, Dermot McGreal DraftClonSDZ0541, Mags Phelan DraftClonSDZ0542, Ciara McHugh DraftClonSDZ0543, Terence Phelan DraftClonSDZ0544, Martina Magee DraftClonSDZ0545, Geoff Grice DraftClonSDZ0550, Cian Fleming DraftClonSDZ0483, Nuno Limos DraftClonSDZ0485, Grace Quinn DraftClonSDZ0487, Liam Canty DraftClonSDZ0489, Sarah Walsh DraftClonSDZ0484, Liam Lynch DraftClonSDZ0482, Jason Shanley DraftClonSDZ0517, Niall and Sandra Harrington DraftClonSDZ0486, Brian Kennedy DraftClonSDZ0488, Michaela Larsson DraftClonSDZ0490, Elaine McManamly)

- 7. Submission outlines that the Lucan area has insufficient infrastructure. The roads, parking, schools, GPs, playschools, crèches, playgrounds in the area cannot accommodate existing community. (<u>DraftClonSDZ0043</u>, <u>Jeanine Nolan</u>)
- 8. Lucan resident highlights concerns in relation to previous development in Lucan and issues in relation to amenities, traffic and facilities for young people. (DraftClonSDZ0316, Eileen Toohey)
- Lucan resident highlights concerns in relation to traffic congestion, traffic volumes, vandalism and absence of facilities for young adults and teenagers in Lucan. (<u>DraftClonSDZ0317</u>, <u>SANDRA McMahon</u>)
- 10. Lucan has a very large young community and has little or no community facilities. Permission has only recently been given for a swimming pool, and a recent public meeting was held in the local school due to lack of community centre. (<u>DraftClonSDZ0334</u>, <u>Gerard Griffin</u>)
- 11. Submission from Coiste Gaeilge Muintir Chrónáin (made as gaeilge and in English) submitting that at least one of both the primary and the secondary schools should be all-Irish medium schools. For the continued use of Irish as a medium of communication it is vital that local authorities help to support and develop 'new' Gaeltacht's.
 Given the trends in the growth of all-Irish medium schools there is no reason to believe that there would not be demand for at least one primary and one secondary all Irish school in Clonburris. There would also be the opportunity to create non-denominational all Irish schools something which currently does not exist in the area.
 (DraftClonSDZ0408, Lile Ní Annracháin, Coiste Gaeilge Muintir Chrónáin)
- 12. No development shall take place until a new Garda station is opened in the south Lucan Area. (DraftClonSDZ0398, Andrew Carton)
- 13. Concern raised include residents of the planning scheme using existing retail facilities in Lucan by reason of existing traffic congestion. (<u>DraftClonSDZ0375</u>, <u>Anita Fletcher</u>)
- 14. The submission refers to Tallaght Hospital and queries whether there are any plans to increase the size, beds and staff at Tallaght Hospital to cover an additional 20,000 people. The Hospital currently is so stretched that it can take over a year for an a simple ultrasound and daily occurrences of cancelled operations due to shortage of beds (from my own personal experience)
 (DraftClonSDZ0304, PAULINE KEOGH)
- 15. Submission outlines that the noise pollution issues on the outer ring road should be addressed prior to the increased traffic from the SDZ (<u>DraftClonSDZ0502, Ed O'Brien & John Curran TD</u>, Fianna Fail Dublin Mid West)





- 16. Both schools on Griffeen Avenue have lots of students from Celbridge and Leixlip, this should be addressed and this would decrease car journeys in the Lucan area. (DraftClonSDZ0434, Nathaniel Doyle)
- 17. Water infrastructure including water pressure improvements are needed for Lucan. (DraftClonSDZ0434, Nathaniel Doyle)
- 18. Extra resources should be guaranteed in Early Intervention Services due to unacceptable waiting times. (<u>DraftClonSDZ0504</u>, <u>South Dublin County PPN</u>, <u>South Dublin County Public Participation Network</u>)
- 19. Submission recalls previous processes of 'Section 8s' for programmes relating to the Grand Canal, in particular the development of the Cycle way on the southern towpath. Expresses disappointment at development and the creation of an embankment alongside towpath. (DraftClonSDZ0606, Sandra Scully)
- The Lucan area is in need of additional infrastructure and services regarding schools, traffic, social activities for children, community hall and child safety. (<u>DraftClonSDZ0511</u>, <u>Julie</u> <u>Kearns</u>)

Chief Executive's Response

A number of issues were raised as part of the 606 submissions received that the Chief Executive considers to be outside the scope of the Draft Planning Scheme. The Chief Executive acknowledges the issues raised. In relation to issues raised referring to the wider Lucan and Clondalkin area, it is considered that a number of issues should be raised during the delivery of other Council functions and are not matters for this statutory consultation process on the Draft Planning Scheme. Furthermore, a range of issues relate to the day to day operation of the Council and are not matters for this statutory consultation process on the Draft Planning Scheme.

Landownership Issues

- There is a concern for South Dublin County Council land being sold to the private sector for the purpose of building private housing.
 Proposed new residents will not be liable to pay ground rent which is currently being paid by local residents. (DraftClonSDZ0023, sean gillen)
- 2. The majority of the SDCC land is currently proposed for the Griffeen Valley Park Extension. If this remains there needs to be a negotiated land swap or equivalent number of units provided for social housing by the land owners/developers in addition to the 10% Part V units. (DraftClonSDZ0308, Madeleine Johansson, People Before Profit)
- The submission refers to landownership and the 30% share of the lands which South Dublin County Council owns. As these lands are the only few in public ownership in the Dublin Mid-West area, it should be used for permanent housing construction. (<u>DraftClonSDZ0308</u>, <u>Madeleine Johansson</u>, <u>People Before Profit</u>)

Chief Executive's Response

A number of issues were raised as part of the 606 submissions received that the Chief Executive considers to be outside the scope of the Draft Planning Scheme. The Chief Executive acknowledges the issues raised in relation to landownership and considers that they are not relevant planning considerations for this statutory consultation process on the Draft Planning Scheme.

Clonburris



Summary of Chief Executive's Proposed Amendments

Table 1.0: Chief Executive's Proposed Amendments

Section	Chief Executive's Proposed Amendments		
Figure 2.1.3	Amend the Legend in Figure 2.1.3 (Function Concept Map) as follows: MIXED USE – NON-RETAIL, COMMUNITY, EMPLOYMENT AND RESIDENTIAL		
Table	Amend Table 2.1.4 (Development Areas) as follows:		
2.1.4	Canal Extension 71.32 2.27		
Section 2.2.3	Add text: Proposed Local and Pedestrian and Cycling Links with existing communities are indicative only and, in accordance with the recommendations of the Permeability Best Practice Guide (2013), shall be subject to further planning approval.		
Table 2.1.6	Retail and Non-Retail Services (Gross Sqm)		
Section 2.2.3	This Planning Scheme also seeks to ensure that all residential development will also be afforded direct or indirect access to dedicated pedestrian and cyclist routes to schools and local facilities especially parks, open spaces, public transport, retail and non-retail services		
Section 2.8	To ensure coherency and quality in design, all medium to large scale development proposals on the SDZ lands (Landmark Buildings, 10 dwellings or more in the case of residential development or development of over 1,000 sq.m in the case of employment or retail/ non-retail services development) shall be accompanied by a Design Statement.		
Section 2.5.3	Gross floor area up to a maximum of 12,920 sqm shall be provided within Clonburris Core Retail Area. It should accommodate a minimum of one large supermarket, with supporting comparison goods floor area. Retail services, Community, leisure, employment, civic and cultural uses should be provided in addition to retail.		
Section 2.5.7	Applications for new retail development shall accord with the requirements outlined in the Planning Scheme in addition to the following criteria: Planning applications for retail development shall provide a general breakdown of retail floorspace to be provided and should have regard to the accompanying Retail Study and the indicative breakdown of floorspace into convenience, comparison and retail services. Retail development should be in accordance with the fundamental objective to support		
Table	the vitality and viability of the retail centre and must demonstrate compliance with the sequential approach. Proposals to amalgamate retail units will be carefully considered.		
Table	Clonburris South West		
2.1.6,	Retail Development – 400 sqm 650 sqm		





Table	
2.6.1,	Clonburris North West
Table	Retail Development – 400 sqm 650 sqm
2.13.1,	Retail Development - 400 sqm 030 sqm
Table	Kishoge South West
3.3.3,	Retail Development – 300 sqm 550 sqm
Table	Netall Development = 300 34m 330 34m
3.3.5,	Kishoge South East
Table	Retail Development – 400 sqm 650 sqm
3.3.8,	Netali Developinent - 400 sqiii
Table	
3.3.9	
3.3.9	
	Commercial uses such as hotels, hostels, bed and breakfast, funeral homes, public
Section 2.6.3	houses, nursing homes, garden centres, conference centres and healthcare facilities etc. are generally permitted in principle in the Urban Centres and will form part of meeting the minimum employment floorspace in the Draft Planning Scheme. Other uses will be considered on a case by case basis having regard to the projected employment,
	employment per sq. metre, the nature of the use and compliance with the Planning Scheme.
Section 2.9.2	Connection of infrastructure to a public water services network is subject to a connection agreement with Irish Water. The provision of private wells will be strongly discouraged and all new developments will be required to utilise and connect to public water infrastructure.
	Section 2.9.3 Foul Water Drainage Connection of infrastructure to a public wastewater services network is subject to a
	connection of infrastructure to a public wastewater services network is subject to a connection agreement with Irish Water. The provision of private waste water facilities will be strongly discouraged and all new developments will be required to utilise and connect to public waste water infrastructure
Section	
2.10.3	All buildings shall be set back 50m from the Grand Canal pNHA boundary and development (with the exception of footpaths and bridges) shall be set 30m from the Grand Canal pNHA boundary.
Section 2.11.2	The Planning Scheme provides for a 50m set-back for all buildings from the northern side of the Grand Canal pNHA boundary, to afford the optimal degree of protection to
	the Grand Canal ecological corridor.
	All development proposals within 50m of the Grand Canal pNHA boundary and feeder streams and 30m meters from the top of the bank of all watercourses shall be accompanied by an Ecological Impact Assessment.
Table	Amend the building height section as follows
3.3.12	

Clonburris



	Area Character ty	pe		Medium density resident	ial infill
	Net development area No of units (Target)		development to the south of the Canal		
			adjacent to existing Grand Canal Park.		
				2.27ha	
			121		
	Average Net Dens	ity (Tar	get)	Sub Sector CE-S1 Average	•
				(Target) 53 * See also Table 2.1.5 for full range of density	
	Affordable/Social	dwellin	gs	To be negotiated in accor	
				relevant legislation and SDCC Housing	
	Building hoight			Policy Sub Sector CE-S1 3-4 2-4:	ctorov
	Building height			* See also Figure 3.3.2 Bu	-
				Concept	munig Height
	Public open space	<u> </u>		2500sqm	
Table	· · · · · · · · · · · · · · · · · · ·		e following amend	ment be made to the Draf	t Planning
4.6	Scheme Table 4.6 L		•		
	Existing Power		•	nt is only applicable for the	4
	Lines	•		East Development Area	
			the existing wayle	•	
	Required				
	Action:			on an incremental, site by	
	Undergrounding			e to accommodate	
	of the 220 kv			be agreed with South	
	from Grange			Eirgrid and other relevant	
	Castle Road	staker	nolders, as require	:a.	
	eastwards				
Table		ended that Table 4.6 be amended to state Phase 1B in place of Phase 2 for Railway Station row and insert 1A for Phase 1:		ce of Phase 2 for	
4.6	the Kishoge Railwa	y Statio	n row and insert 1	A for Phase 1:	
	Infrastructure		Development Are	ea Restricted	Phase
	Kishoge Railway S	tation	This phasing	requirement is only	1 & 2
				development within the	
	Required Actions:		Kishoge catchn		1A & 1B
			-	shoge South East, Kishoge	
	Agree timeframe		Kishoge North East Development Areas.		
	opening in Phase	1 A			
	Dailway Station or	nonina			
	Railway Station on in Phase 2-1B	bening			
	111 1 1192C = 1D				
Section					
4.10	The development	of tha Cr	07 lands is subject	to the SDCC Section 40 De	volonment
	•		•	to the SDCC Section 48 De	•
	Contribution Scheme 2016-2022 and the Kildare Route Project Section 49 Contribution Scheme and any applicable superseding schemes.			-5 CONTINUEDIT	





	The SDZ Order (S.I. No. 604 of 2015) states that the development agency specified for the purposes of section 168 of the Planning and Development Act 2000 (as amended) is South Dublin County Council. South Dublin County Council shall proactively manage and promote the integrated development of this Planning Scheme.				
	In some cases, the completion of works required to facilitate residential development in a phased manner within the Planning Scheme are outside the direct control of either SDCC, the SDZ landowners or the Development Agency. All measures and funding streams available for the release of funding to provide for the delivery of infrastructure and community facilities in Clonburris will be pursued in conjunction with landowners/developers.				
Section 4.4.3 of the SEA ER	The protected, rare and/or sensitive species recorded within the 3 tetrads surrounding the proposed SDZ Planning Scheme are outlined in Table 6. As virtually all All wild birds are protected in Ireland, only records for amber and red listed species are detailed in Table 7. A comment on the likelihood of each of these species occurring within the SDZ Planning Scheme is provided in the table below. Note the likelihood of presence is based upon the habitat occurring within the SDZ lands.				
Section 7.11 of the SEA ER	Additional cumulative impact assessment of projects particularly those identified by the NPWS in their submission, i.e.: The Grand Canal Greenway, Griffeen Valley cycleway extension, the development of the Grange Castle Business Park and the proposed re-construction of the R120 road bridge over the Grand Canal on the western edge of the SDZ under a part 8 scheme agreed by South Dublin County Council in 2012.				
Table 20 of SEA ER	Biodiversity Flora and Fauna	B1:To avoid loss of habitats, geological features, species or their sustaining resources in and outside of 17designated and ecological sites	B1: Percentage of relevant habitats and species lost as a result of implementation of the Planning Scheme	B1: No losses of relevant habitats, species or their sustaining resources in designated ecological sites as a result of implementation of the SDZ Planning Scheme	Designated ecological sites mapping, CORINE Mapping, National Parks and Wildlife Service Records & Development Management Process in SDCC.
Section 3.2.2 of SEA ER	National Biodiv	versity Plan (2011	- 2016) National Bi	odiversity Plan (201	17-2021)
Section 4.12 of SEA ER	Biodiversity, flora and fauna: The provision of appropriate buffer zones particularly around the watercourses would likely be the minimum of 30m; however the new, Planning Scheme provides for a 50m set-back for all buildings from the northern side of the Grand Canal pNHA boundary, to afford the optimal degree of protection to the Grand Canal ecological corridor. Additional measures have been incorporated through				





	the SEA process as regards maintaining the integrity of the riparian habitats associated with the Canal and other watercourses.		
Pg. 154 of SEA ER	_		
	All buildings shall be set back 50m from the pNHA boundary Canal and development (with the exception of footpaths and bridges which shall be set 30m from the Grand Canal). Development proposals along the Grand Canal Corridor shall be accompanied by ecological impact assessments undertaken by an appropriately qualified and experienced ecologist and in line with CIEEM guidelines (2016).		
Section 4 of AA	The connection between the SDZ lands and Dublin Bay via the Griffeen and Camac rivers and Grand Canal, the water chemistry of which could be affected by activities in the SDZ lands;		
Insert to AA	Section 5: Assessment of Proposed Amendments to the Clonburris SDZ Draft Planning Scheme Following the period of public display and the Chief Executive's Report on submissions and observations received in respect of the Clonburris SDZ Draft Planning Scheme, a number of amendments were recommended by the Chief Executive in the CE Report. The proposed amendments comprised minor changes to the existing text in both tables and contextual paragraphs, revisions to an existing figure, reduction of the net area of the Canal Extension Development Area, an increase in the gross retail area for Clonburris South West, Clonburris North West, Kishoge South West and Kishoge South East development areas and changes to the permitted building height for the Clonburris South East area (Table 3.3.2). These proposed amendments were screened for their potential to have likely significant effects on European sites. None of the proposed revisions were deemed to pose any likelihood of significant effects on European sites for the following reasons: • The proposed revisions are benign in nature. • There were no impact pathways or cause effect linkages arising from the proposed revisions; and;		

Clonburris







0.7 Conclusion

Taking account of the proper planning and sustainable development of the area, it is recommended that the proposed amendments to the Clonburris Strategic Development Zone Draft Planning Scheme be made in accordance with the recommendations of this report.











List of Appendices

Appendix A: List of Persons, Organisations and Bodies who made Submissions

Appendix B: Images of dedicated website and Clonburris public consultation video

Appendix C: Newspaper Notice

Appendix D: Public Consultation Leaflet

Appendix E: Ecological Surveys (under separate cover)





Appendix A: List of Persons, Organisations and Bodies who made Submissions

Person	Organisation / Company (if applicable)	Body Represented (if applicable)	Reference
Richard Dillon			DraftClonSDZ0001
Kellie Curran			DraftClonSDZ0002
Scott Greenwood			DraftClonSDZ0003
Jordan Gallagher			DraftClonSDZ0004
Nicholas Roche			DraftClonSDZ0005
Jennifer Byrne			<u>DraftClonSDZ0006</u>
Jennifer Byrne			<u>DraftClonSDZ0007</u>
Stephen John			DraftClonSDZ0008
Aoife McKenna			DraftClonSDZ0009
Conor McGuinness			DraftClonSDZ0010
David Greville			DraftClonSDZ0011
Sarah Parlane			DraftClonSDZ0012
Denise Mary Byrne			DraftClonSDZ0013
Adam Sebestyen			DraftClonSDZ0014
Eva Bowden Wade			DraftClonSDZ0015
Susan Bermingham			DraftClonSDZ0016
Aimee Looney			DraftClonSDZ0017
Fiona Fitzgerald			<u>DraftClonSDZ0018</u>
Edel Cassidy			<u>DraftClonSDZ0019</u>
Liam Doran			<u>DraftClonSDZ0020</u>
Alan Duffy			<u>DraftClonSDZ0021</u>
Jennifer Duffy			<u>DraftClonSDZ0022</u>
Sean Gillen			<u>DraftClonSDZ0023</u>
Oh hujio0			<u>DraftClonSDZ0024</u>
Alison Gahan			<u>DraftClonSDZ0025</u>
Sarah Cleary			<u>DraftClonSDZ0026</u>
Audrey Molloy			<u>DraftClonSDZ0027</u>
Paul Mulhall			<u>DraftClonSDZ0028</u>
Alan Johnson			<u>DraftClonSDZ0029</u>
Gary Jones			<u>DraftClonSDZ0030</u>
Karen Sheehan			<u>DraftClonSDZ0031</u>
Sandra Looney			<u>DraftClonSDZ0032</u>
Nigel McGuirk			<u>DraftClonSDZ0033</u>
Noise Pollution	Lucan Noise Pollution		DraftClanSD70034
	Solution		DraftClonSDZ0034 DraftClonSDZ0035
Stephen Murray			
Paula Regan			DraftClonSDZ0036
Darren Johnson			<u>DraftClonSDZ0037</u>





Darren Kenny		DraftClonSDZ0038
Valerie Ennis		DraftClonSDZ0039
	E. h h B h . h	<u>DiaitcionsD20039</u>
Foxborough Residents Group Lucan	Foxborough Residents Group	DraftClonSDZ0040
Jonathan Kavanagh	Group	DraftClonSDZ0041
Joanne Flynn		DraftClonSDZ0042
Jeanine Nolan		DraftClonSDZ0042
Neil Nolan		DraftClonSDZ0044
Kevin Coyle Mark Field		DraftClonSDZ0045
		DraftClonSDZ0046
Tayyaba Mashood		DraftClonSDZ0047
Najia Malik		DraftClonSDZ0048
Ruth Beasley		<u>DraftClonSDZ0049</u>
	Labour Party Clondalkin	5 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6
Pamela Corrigan	Branch/ Dublin Mid West	<u>DraftClonSDZ0050</u>
Brendan Keenan		<u>DraftClonSDZ0051</u>
Lynda Curtis		<u>DraftClonSDZ0052</u>
Michael McCabe		<u>DraftClonSDZ0053</u>
Celine Dunning		<u>DraftClonSDZ0054</u>
Ellen Ward		<u>DraftClonSDZ0055</u>
Elizabeth Grace		<u>DraftClonSDZ0056</u>
	Transport Infrastructure	
Tara Spain	Ireland	<u>DraftClonSDZ0057</u>
Samra Nisa		<u>DraftClonSDZ0058</u>
Abbas Ahmed Dogar		<u>DraftClonSDZ0059</u>
Rabeeb Ahmed Mirza		<u>DraftClonSDZ0060</u>
Amtul Hafeez		<u>DraftClonSDZ0061</u>
Dylan Nolan		<u>DraftClonSDZ0062</u>
Dolores Judge		<u>DraftClonSDZ0063</u>
ZAHEER AHMAD		<u>DraftClonSDZ0064</u>
IFTIKHAR AHMAD		<u>DraftClonSDZ0065</u>
AMJAD MAHMOOD		5 6 6 6 6 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7
AHMAD		<u>DraftClonSDZ0066</u>
Asad Iftikhar		<u>DraftClonSDZ0067</u>
Muhammad Ahsan		<u>DraftClonSDZ0068</u>
Razia Begum		<u>DraftClonSDZ0069</u>
Fiona Brown		<u>DraftClonSDZ0070</u>
Ciara Enright		<u>DraftClonSDZ0071</u>
Laura Duke		<u>DraftClonSDZ0072</u>
Jim Houlihan		<u>DraftClonSDZ0073</u>
ABDUL RAUF KHAN		<u>DraftClonSDZ0074</u>
QuratUl Ain		<u>DraftClonSDZ0075</u>
Rafiq Ahmed		<u>DraftClonSDZ0076</u>
QuratUl Ain		<u>DraftClonSDZ0077</u>





M Ahmed		DraftClonSDZ0078
Wendy lynham		DraftClonSDZ0079
Sikandar ch		DraftClonSDZ0080
Shamifa Zaheer		DraftClonSDZ0081
Liam Bermingham		DraftClonSDZ0082
Susan Bermingham		DraftClonSDZ0083
Corey Sammon		DraftClonSDZ0084
Rizwan Ahmad		DraftClonSDZ0085
Saliha Asad		DraftClonSDZ0085
Shama Asad		DraftClonSDZ0086
Patrick Muldowney Amna Nadeem		<u>DraftClonSDZ0088</u> DraftClonSDZ0089
Khizar Hayat		<u>DraftClassCDZ0090</u>
M Ahmed		DraftClonSDZ0091
QuratUl Ain		DraftClonSDZ0092
Rafiq Ahmed		DraftClonSDZ0093
Mussarat ch		DraftClonSDZ0094
Imdad ch		<u>DraftClonSDZ0095</u>
Laura Flanagan		<u>DraftClonSDZ0096</u>
Chris and Therese Kavanagh		DraftClonSDZ0097
Declan Donnelly		DraftClonSDZ0098
Tanya McDonald Donnelly		DraftClonSDZ0099
Frances Norton		DraftClonSDZ0100
Peter Kelly		DraftClonSDZ0100
reter keny	Lucas Fact Educate	<u>DiaitCioli3DZ0101</u>
Eddie Fox	Lucan East Educate Together National School	DraftClonSDZ0102
Thomas & Marian Murphy	rogether National School	DraftClonSDZ0103
Nusrat un nisa		DraftClonSDZ0104
Nusrat un nisa		DraftClonSDZ0104
Ronald Gunning		DraftClonSDZ0106
Konalu Guillillig	Griffeen Glen Residents	<u>DIAITCIONSDZ0106</u>
Peter Corby	Association	DraftClonSDZ0107
Maria Smith		DraftClonSDZ0108
Nadeem Amjad		DraftClonSDZ0109
Maria Smith		DraftClonSDZ0110
	Clonburris Lucan Action	<u>Diaresionopeorro</u>
Lucan Residents	Group	<u>DraftClonSDZ0111</u>
Aleem Uddin		DraftClonSDZ0112
CATHERINE GEOGHEGAN		<u>DraftClonSDZ0113</u>
Fareeha Aleem		DraftClonSDZ0114
Sehrish Zahoor		DraftClonSDZ0115
Zahid Kamran		DraftClonSDZ0116
Maiza Kamran		DraftClonSDZ0117
Afshan Kamran		DraftClonSDZ0118





<u>DraftClonSDZ0119</u>
<u>DraftClonSDZ0120</u>
<u>DraftClonSDZ0121</u>
<u>DraftClonSDZ0122</u>
<u>DraftClonSDZ0123</u>
<u>DraftClonSDZ0124</u>
<u>DraftClonSDZ0125</u>
<u>DraftClonSDZ0126</u>
<u>DraftClonSDZ0127</u>
<u>DraftClonSDZ0128</u>
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<u>DraftClonSDZ0130</u>
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<u>DraftClonSDZ0150</u>
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DraftClonSDZ0162





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Thomas Lacey		<u>DraftClonSDZ0163</u>
Gerard Kenny		<u>DraftClonSDZ0164</u>
Peter Keogh		<u>DraftClonSDZ0165</u>
Andrew Mowatt		<u>DraftClonSDZ0166</u>
Niamh Kilcullen		<u>DraftClonSDZ0167</u>
Stephen O'Reilly		<u>DraftClonSDZ0168</u>
Deirdre Niland		<u>DraftClonSDZ0169</u>
Stephen Haddock		<u>DraftClonSDZ0170</u>
A Fahy		<u>DraftClonSDZ0171</u>
Aisha Humayun		<u>DraftClonSDZ0172</u>
Lisa Greene		<u>DraftClonSDZ0173</u>
Peter Klasovity		<u>DraftClonSDZ0174</u>
Ingrid Gartland		<u>DraftClonSDZ0175</u>
Bridget Nolan		<u>DraftClonSDZ0176</u>
Patrick Oloughlin		<u>DraftClonSDZ0177</u>
Glenn Roche		<u>DraftClonSDZ0178</u>
Fintan McConnell		<u>DraftClonSDZ0179</u>
Rupert Fuller		<u>DraftClonSDZ0180</u>
Ken Kiberd		DraftClonSDZ0181
Carmel & Willaim Burke		<u>DraftClonSDZ0182</u>
Karen Hayes		<u>DraftClonSDZ0183</u>
Barry Jenkinson		<u>DraftClonSDZ0184</u>
Hazel Smyth		<u>DraftClonSDZ0185</u>
Nicola Kennedy		<u>DraftClonSDZ0186</u>
Stephen Scallan		<u>DraftClonSDZ0187</u>
	National Transport	
David Clements	Authority	<u>DraftClonSDZ0188</u>
Mark Reid		<u>DraftClonSDZ0189</u>
Christy Garrett		<u>DraftClonSDZ0190</u>
Rafal Marzec		DraftClonSDZ0191
Brian O'Neill		<u>DraftClonSDZ0192</u>
Kim Rice		<u>DraftClonSDZ0193</u>
Brian Shortall		<u>DraftClonSDZ0194</u>
South Dublin County Joint	South Dublin County	
Policing Committee	Joint Policing Committee	<u>DraftClonSDZ0195</u>
Andrea Panikova		<u>DraftClonSDZ0196</u>
Damian McKillop		<u>DraftClonSDZ0197</u>
Aine McKinlay		<u>DraftClonSDZ0198</u>
Siobhan Stoneham		<u>DraftClonSDZ0199</u>
Lisa Murtagh		<u>DraftClonSDZ0200</u>
Mary Haddock		DraftClonSDZ0201
Siobhan Stoneham		DraftClonSDZ0202
Nicola Walsh		<u>DraftClonSDZ0203</u>





William Lavelle		DraftClonSDZ0204
Mary Walsh		<u>DraftClanSDZ0205</u>
Sean Smith		<u>DraftClanSDZ0206</u>
Rose-Ann Lennon		DraftClonSDZ0207
Antoinette Lennon		DraftClonSDZ0208
Claire Lennon		<u>DraftClonSDZ0209</u>
Joseph Lennon		<u>DraftClonSDZ0210</u>
Sinead Battle		<u>DraftClonSDZ0211</u>
Sean Giblin	Finnstown Fairways Residents Association	<u>DraftClonSDZ0212</u>
Siobhan Walsh		<u>DraftClonSDZ0213</u>
Gillian McCarthy		<u>DraftClonSDZ0214</u>
Graham Walsh		<u>DraftClonSDZ0215</u>
LIONA O'TOOLE		<u>DraftClonSDZ0216</u>
Frank Hynes		<u>DraftClonSDZ0217</u>
Helen Nix		<u>DraftClonSDZ0218</u>
Donncha Cleary		<u>DraftClonSDZ0219</u>
Joe McDermott		<u>DraftClonSDZ0220</u>
Elaine Hurley		<u>DraftClonSDZ0221</u>
Audrey Clayton		DraftClonSDZ0222
Trevor Gilligan		<u>DraftClonSDZ0223</u>
Valerie Mcneill		DraftClonSDZ0224
Sarah Moroney		<u>DraftClonSDZ0225</u>
Valerie Mcneill		<u>DraftClonSDZ0226</u>
Stacey Lacken		DraftClonSDZ0227
Diane O'Connell		<u>DraftClonSDZ0228</u>
Lisa Rodgers		<u>DraftClonSDZ0229</u>
Cllr Francis Timmons		<u>DraftClonSDZ0230</u>
Jennifer Winters		<u>DraftClonSDZ0231</u>
Cllr Francis Timmons		<u>DraftClonSDZ0232</u>
Cllr Francis Timmons		<u>DraftClonSDZ0233</u>
	Health Service Executive (HSE) - Environmental	
Fiona Byrne	Health	<u>DraftClonSDZ0234</u>
Edina Almasi		<u>DraftClonSDZ0235</u>
ISO Solutions Ireland	ISO Solutions Ireland	<u>DraftClonSDZ0236</u>
Hugh McSweeney		<u>DraftClonSDZ0237</u>
Martin Whelan		<u>DraftClonSDZ0238</u>
Lorraine Carroll		<u>DraftClonSDZ0239</u>
Beatriz Martinez		<u>DraftClonSDZ0240</u>
Sarah Holland		<u>DraftClonSDZ0241</u>
Deirdre Nolan	Cappaghmore Residents Group	<u>DraftClonSDZ0242</u>
Elizabeth Nolan		<u>DraftClonSDZ0243</u>





Roisin Domican		DraftClonSDZ0244
Stephen Murphy		DraftClonSDZ0245
Stephen Marphy	Westbourne Community	<u> </u>
George Graham	Group	DraftClonSDZ0246
Jean McCarthy		DraftClonSDZ0247
Caroline O'Brien		DraftClonSDZ0248
John O'Brien		DraftClonSDZ0249
John C Brief	Ahmadiyya Muslim	<u> </u>
M Anwar Malik	Association	<u>DraftClonSDZ0250</u>
Amanda O'Sullivan		<u>DraftClonSDZ0251</u>
	Ahmadiyya Muslim	
Dr Mashood Ahmed	Association Ireland	<u>DraftClonSDZ0252</u>
Mansoor Malik		<u>DraftClonSDZ0253</u>
Edel Bracken		<u>DraftClonSDZ0254</u>
James Haughton		<u>DraftClonSDZ0255</u>
	Ahmadiyya Muslim	
Fazal Ur Rehman Butt	Association Ireland	<u>DraftClonSDZ0256</u>
Deirdre McIntyre		<u>DraftClonSDZ0257</u>
Robert McNeill		<u>DraftClonSDZ0258</u>
Caitriona McGrath		<u>DraftClonSDZ0259</u>
Andrew Newman		<u>DraftClonSDZ0260</u>
Susan Skelly		<u>DraftClonSDZ0261</u>
Joseph Dolan		<u>DraftClonSDZ0262</u>
Eilis Slattery		<u>DraftClonSDZ0263</u>
Christine Broderick		<u>DraftClonSDZ0264</u>
Ian McLean		<u>DraftClonSDZ0265</u>
Steven Abbey		<u>DraftClonSDZ0266</u>
Niamh Brennan		DraftClonSDZ0267
	Department of Housing,	
Name de Ni Diemelakain	Planning and Local	D # Cl CD 703 C0
Maude Ni Bhrolchain	Government	DraftClonSDZ0268
Shane Roche		DraftClonSDZ0269
Joan Johnson		<u>DraftClonSDZ0270</u>
John Donohue		DraftClonSDZ0271
Andy Lane		<u>DraftClonSDZ0272</u>
Darren Nolan		DraftClonSDZ0273
Stephen Daly		<u>DraftClonSDZ0274</u>
Rachel Kavanagh		<u>DraftClonSDZ0275</u>
Anne Daly		<u>DraftClonSDZ0276</u>
David lynham		<u>DraftClonSDZ0277</u>
Liam Swan		<u>DraftClonSDZ0278</u>
Lisa Fitzpatrick		<u>DraftClonSDZ0279</u>
John Egan		<u>DraftClonSDZ0280</u>
Pamela Dunne		<u>DraftClonSDZ0281</u>
Josephine Kavanagh		<u>DraftClonSDZ0282</u>





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Adam Molloy			<u>DraftClonSDZ0283</u>
Evelyn Smyth			<u>DraftClonSDZ0284</u>
Carol Hogg			<u>DraftClonSDZ0285</u>
Lee Ogden			<u>DraftClonSDZ0286</u>
Catherine Bennett			<u>DraftClonSDZ0287</u>
Conor Bracken			<u>DraftClonSDZ0288</u>
Josephine McNamara			<u>DraftClonSDZ0289</u>
Agnes Maher			<u>DraftClonSDZ0290</u>
Mark Coade			<u>DraftClonSDZ0291</u>
Mary Dwyer			DraftClonSDZ0292
John Byrne			DraftClonSDZ0293
Kenny Doyle			DraftClonSDZ0294
	CIE Group Property		
Aidan Ruane	Management		<u>DraftClonSDZ0295</u>
	Eastern and Midland		
Malachy Bradley	Regional Assembly		DraftClonSDZ0296
Celine Kiernan			DraftClonSDZ0297
Laura Spencer			DraftClonSDZ0298
Sharon Cleary			DraftClonSDZ0299
	Department of Arts,		
	Heritage and the		
Manager Dau	Gaeltacht		<u>DraftClonSDZ0300</u>
Claire Mescall			<u>DraftClonSDZ0301</u>
Sinead Dillon			<u>DraftClonSDZ0302</u>
Lidl Ireland GmbH	Lidl Ireland GmbH	Lidl Ireland Gmbh	<u>DraftClonSDZ0303</u>
PAULINE KEOGH			<u>DraftClonSDZ0304</u>
Tesco Ireland Limited	Tesco Ireland Limited		<u>DraftClonSDZ0305</u>
Sandra Scanlon			<u>DraftClonSDZ0306</u>
Margaret Hanlon			<u>DraftClonSDZ0307</u>
Madeleine Johansson	People Before Profit		<u>DraftClonSDZ0308</u>
Kim O Halloran			<u>DraftClonSDZ0309</u>
Orla Flanagan			<u>DraftClonSDZ0310</u>
Tomas Bradley	EirGrid plc		<u>DraftClonSDZ0311</u>
Tina Mc Garry			DraftClonSDZ0312
Tom Moriarty			DraftClonSDZ0313
Grainne Hargaden			DraftClonSDZ0314
Niall Flanagan			DraftClonSDZ0315
Eileen Toohey			DraftClonSDZ0316
SANDRA McMahon			DraftClonSDZ0317
John Gobbett			DraftClonSDZ0318
Renata Escobar			DraftClonSDZ0319
Najiya Kiran			DraftClonSDZ0320
Najiya Kiran			DraftClonSDZ0321
Catherine Brady			DraftClonSDZ0322
Catherine Brady			DrattClonSDZ0322





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Najiya Kiran			<u>DraftClonSDZ0323</u>
Najiya Kiran			<u>DraftClonSDZ0324</u>
Paddy Boyd	Canoeing Ireland		<u>DraftClonSDZ0325</u>
Najiya Kiran			<u>DraftClonSDZ0326</u>
Janvi Shah			<u>DraftClonSDZ0327</u>
Abbie Clissold			DraftClonSDZ0328
	Clear Real Estate		
Stephen Little	Investments PLC		<u>DraftClonSDZ0329</u>
David Stafford			<u>DraftClonSDZ0330</u>
Elaine Patriarca			<u>DraftClonSDZ0331</u>
Paul Gogarty			DraftClonSDZ0332
Gary Hore			DraftClonSDZ0333
Gerard Griffin			DraftClonSDZ0334
Dietacaron	Dietacaron	Dietacaron	DraftClonSDZ0335
Ray Donnellan	Dublin Bus		DraftClonSDZ0336
Hines Real Estate Ireland	Hines Real Estate Ireland		
Limited	Limited		DraftClonSDZ0337
Fiona McCormack			DraftClonSDZ0338
Harry Lee			DraftClonSDZ0339
	Ahmadiyya Muslim		
Shahid Ahmed	Association Ireland		<u>DraftClonSDZ0340</u>
	Ahmadiyya Muslim		
Muhammad Anwar Malik	Association		<u>DraftClonSDZ0341</u>
	Ahmadiyya Muslim		D (10) 00 000 10
Muhammad Anwar Malik	Association	Cuanala da	<u>DraftClonSDZ0342</u>
		Everglade Properties	
Everglade Properties		Limited (In	
Limited (In Receivership)		Receivership)	DraftClonSDZ0343
Kelland Homes Ltd	Kelland Homes Ltd	, , , , , , , , , , , , , , , , , , , ,	DraftClonSDZ0344
Stephen Gorman	Trending from 55 and		DraftClonSDZ0345
Stephen Corman	CIE Group Property		<u>Diditionob20010</u>
Aidan Ruane	Management		DraftClonSDZ0346
Una Mullaney			DraftClonSDZ0347
Emma Carolan			DraftClonSDZ0348
lan Daly			DraftClonSDZ0349
Deirdre O'Connor,			
National Asset			
Management Agency	NAMA		<u>DraftClonSDZ0350</u>
Cairn Homes Plc		Cairn Homes	DraftClonSDZ0351
Rita O'Brien			DraftClonSDZ0352
Stephen O' Rafferty			DraftClonSDZ0353
Kay Daly			DraftClonSDZ0354
Edwin Doyle			DraftClonSDZ0355
Peter Flynn			DraftClonSDZ0356
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Meena		
BASKARASUBRAMANIAN		DraftClonSDZ0357
Eoin O'Broin		DraftClonSDZ0358
	Westbury Court	
Denis Twohig	Residents Association	<u>DraftClonSDZ0359</u>
Josephine Alinquant		<u>DraftClonSDZ0360</u>
Olag Sivanantham	Adamstown Cricket Club	<u>DraftClonSDZ0361</u>
Joseph Howard		<u>DraftClonSDZ0362</u>
Marta Estalayo		<u>DraftClonSDZ0363</u>
Ruth Mckenna		DraftClonSDZ0364
June Doyle		<u>DraftClonSDZ0365</u>
David Quinn		DraftClonSDZ0366
Ciaran Daly		DraftClonSDZ0367
Frances Fitzgerald TD		DraftClonSDZ0368
Patricia Dunphy		<u>DraftClonSDZ0369</u>
Shirley Clarke		DraftClonSDZ0370
	Department of	
Doire O'Cuinn	Education and Skills	<u>DraftClonSDZ0371</u>
Patrick Comerford		<u>DraftClonSDZ0372</u>
Alan Ryan		<u>DraftClonSDZ0373</u>
Sarah Comerford		<u>DraftClonSDZ0374</u>
Anita Fletcher		<u>DraftClonSDZ0375</u>
Marie Fitzpatrick		<u>DraftClonSDZ0376</u>
Darren Cullen		<u>DraftClonSDZ0377</u>
Patrick Tully		<u>DraftClonSDZ0378</u>
James Milton		<u>DraftClonSDZ0379</u>
Ingrid Mc Donnell		<u>DraftClonSDZ0380</u>
Brian Murray		<u>DraftClonSDZ0381</u>
Paul Corcoran	Dublin Cycling Campaign	DraftClonSDZ0382
Eoin O'Broin TD		<u>DraftClonSDZ0383</u>
Grainne Lamon		DraftClonSDZ0384
Ceola Stanley		<u>DraftClonSDZ0385</u>
Kinga Drozdz		<u>DraftClonSDZ0386</u>
Owen Meade		DraftClonSDZ0387
Siby Joseph		<u>DraftClonSDZ0388</u>
Ingrid Mc Donnell		<u>DraftClonSDZ0389</u>
Tom Fitzpatrick		<u>DraftClonSDZ0390</u>
Richard Daly		<u>DraftClonSDZ0391</u>
Gerard Smyth		<u>DraftClonSDZ0392</u>
Ronan Burke		<u>DraftClonSDZ0393</u>
Richard Daly		<u>DraftClonSDZ0394</u>
Gema Pintor		<u>DraftClonSDZ0395</u>
Emer Lynch		DraftClonSDZ0396
Marta Isopo		DraftClonSDZ0397
Andrew Carton		DraftClonSDZ0398





Guss O'Connell		<u>DraftClonSDZ0399</u>
George Hughes		<u>DraftClonSDZ0400</u>
Joyce Dolan		<u>DraftClonSDZ0401</u>
Anna O'Neill		<u>DraftClonSDZ0402</u>
Kerrie Walsh		<u>DraftClonSDZ0403</u>
Brendan Shiels		<u>DraftClonSDZ0404</u>
Roisin Healy		<u>DraftClonSDZ0405</u>
Bernadette Doyle		<u>DraftClonSDZ0406</u>
LIONA O'TOOLE		<u>DraftClonSDZ0407</u>
Lile Ni Anrachain	Coiste Gaeilge Muintir Chronain	<u>DraftClonSDZ0408</u>
Ciaran O'Toole		<u>DraftClonSDZ0409</u>
Karen Dunne		<u>DraftClonSDZ0410</u>
Lisa Moloney		<u>DraftClonSDZ0411</u>
Darragh Mac Fiaich		DraftClonSDZ0412
Tania Daly		DraftClonSDZ0413
Fiona Moriarty		DraftClonSDZ0414
	South Dublin	
Sinead Ni Bhain	Conservation Society	DraftClonSDZ0415
	Labour Party, Lucan	
Joanna Tuffy	Electoral Area	<u>DraftClonSDZ0416</u>
Siobhan Donnelly		<u>DraftClonSDZ0417</u>
Seamus & Kathleen Finn		<u>DraftClonSDZ0418</u>
Cllr. Emer Higgins		<u>DraftClonSDZ0419</u>
lan Lamon		<u>DraftClonSDZ0420</u>
Lesley Keogh		<u>DraftClonSDZ0421</u>
Jonathan Mercier		<u>DraftClonSDZ0422</u>
Damien Moloney		<u>DraftClonSDZ0423</u>
John Coleman		DraftClonSDZ0424
Sinead Hall		<u>DraftClonSDZ0425</u>
Breeda De Vines		<u>DraftClonSDZ0426</u>
Ciara Weafer		<u>DraftClonSDZ0427</u>
Helena Doyle		<u>DraftClonSDZ0428</u>
Edelle Boles		<u>DraftClonSDZ0429</u>
Ashleigh D'Arcy		<u>DraftClonSDZ0430</u>
Andrew Shinnick		<u>DraftClonSDZ0431</u>
Sara Lemos		<u>DraftClonSDZ0432</u>
Ciara Reidy		<u>DraftClonSDZ0433</u>
Nathaniel Doyle		DraftClonSDZ0434
Tilly Reidy		<u>DraftClonSDZ0435</u>
Mr Naheed		<u>DraftClonSDZ0436</u>
Eoin Cullen		<u>DraftClonSDZ0437</u>
Des Delaney		<u>DraftClonSDZ0438</u>
Veronica O'Callaghan		DraftClonSDZ0439





Mary Ginty	<u>DraftClonSDZ0440</u>
Liam Reidy	<u>DraftClonSDZ0441</u>
Tony Lawlor	<u>DraftClonSDZ0442</u>
Grace Lombard	<u>DraftClonSDZ0443</u>
Adrian Reidy	<u>DraftClonSDZ0444</u>
Nuala Reidy	<u>DraftClonSDZ0445</u>
Elaine Collins	<u>DraftClonSDZ0446</u>
Aine O'Sullivan	<u>DraftClonSDZ0447</u>
Declan Cotter	<u>DraftClonSDZ0448</u>
Marian Spollen	<u>DraftClonSDZ0449</u>
Cherie Lynch	<u>DraftClonSDZ0450</u>
K E Fendic	<u>DraftClonSDZ0451</u>
Leighanne Spollen	<u>DraftClonSDZ0452</u>
Skirmante Doda	<u>DraftClonSDZ0453</u>
Sean Shortt	DraftClonSDZ0454
Graeme McKenna	DraftClonSDZ0455
Gillian McKenna	DraftClonSDZ0456
Suzanne Richardson	DraftClonSDZ0457
Gerard McKenna	DraftClonSDZ0458
Joan McKenna	DraftClonSDZ0459
Noel McKenna	DraftClonSDZ0460
Maura Thunder	DraftClonSDZ0461
Liam Thunder	DraftClonSDZ0462
Louise Thunder	DraftClonSDZ0463
Claire Thunder	DraftClonSDZ0464
Emma Thunder	DraftClonSDZ0465
Brian Thunder	DraftClonSDZ0466
Gavin Byrne	DraftClonSDZ0467
Jack Byrne	DraftClonSDZ0468
Richard Gleeson	DraftClonSDZ0469
Stephen O'Brien	DraftClonSDZ0470
Michael Clarke	DraftClonSDZ0471
Mark Brennan	DraftClonSDZ0472
Mark O'Byrne	DraftClonSDZ0473
Conor Smith	DraftClonSDZ0474
Stephanie Fleming	DraftClonSDZ0475
Lynne Cosgrave	DraftClonSDZ0476
Sarah Gill	DraftClonSDZ0477
Muhammad Ali	DraftClonSDZ0478
Anna Wezyu	DraftClonSDZ0479
Gill Devereux	DraftClonSDZ0480
Bernadette Ward	DraftClonSDZ0481
Jason Shanley	DraftClonSDZ0482
Nuno Limos	DraftClonSDZ0483





Liam Lynch			DraftClonSDZ0484
Grace Quinn			DraftClonSDZ0485
Brian Kennedy			<u>DraftClonSDZ0486</u>
Liam Canty			<u>DraftClonSDZ0487</u>
Michaela Larsson			DraftClonSDZ0488
Sarah Walsh			DraftClonSDZ0489
Elaine McManamly			DraftClonSDZ0490
Wayne Quinn			DraftClonSDZ0491
Jim Milton			DraftClonSDZ0492
Rev John Hassett			DraftClonSDZ0493
Rita Fitzsimons			DraftClonSDZ0494
Peter Keogh	Lucan Pitch & Putt Club		DraftClonSDZ0495
Seamus MacMaolduin			DraftClonSDZ0496
Owner/ Occupier			DraftClonSDZ0497
Cllr Breeda Bonner			DraftClonSDZ0498
Deirdre Nolan			DraftClonSDZ0499
Declan Hanley			DraftClonSDZ0500
•			DraftClonSDZ0500
Nichola Flynn			DraitCionSD20501
Ed Olbrian	Fianna Fail Dublin Mid		D==f+Cl==CD70E02
Ed O'Brien	West		DraftClonSDZ0502
Selina Bonnie	Carrette Direktive Carrette		<u>DraftClonSDZ0503</u>
	South Dublin County Public Participation		
South Dublin County PPN	Network		<u>DraftClonSDZ0504</u>
Paula Kelly	IVECTION		DraftClonSDZ0505
Tom Newton			DraftClonSDZ0506
Caitriona McClean			DraftClonSDZ0507
Caltriona McClean		The Heapes	DIAILCIONSD20507
The Heapes Family		Family	DraftClonSDZ0508
B Doyle		1 anning	DraftClonSDZ0509
Stephen O'Reilly	ESB Networks		DraftClonSDZ0510
Julie Kearns	L3D NetWorks		DraftClonSDZ0511
Julie Realtis			DIAICCIONSDZUSTI
Stanban Drawna	Clondalkin Travellers		DraftClanCD70E12
Stephen Browne	Development Group		DraftClonSDZ0512
Brian Nolan			DraftClarsDZ0513
The Tracey Family			DraftClonSDZ0514
Christopher Conway			DraftClonSDZ0515
Sandra Fleming			<u>DraftClonSDZ0516</u>
Niall and Sandra			DroftClosCD70517
Harrington			DraftClonSDZ0517
Maeve Flynn			DraftClonSDZ0518
Mr and Mrs Carew			DraftClonSDZ0519
Peter Stafford			DraftClonSDZ0520
Sarah Roche			<u>DraftClonSDZ0521</u>
Carol Roche			<u>DraftClonSDZ0522</u>





<u> </u>		
Catherine Roche		<u>DraftClonSDZ0523</u>
John Roche		<u>DraftClonSDZ0524</u>
Dermot McGreal		<u>DraftClonSDZ0525</u>
Ken Kiberd		<u>DraftClonSDZ0526</u>
Laura Gaughan		<u>DraftClonSDZ0527</u>
Bernard Gaughan		<u>DraftClonSDZ0528</u>
Leigh Ann Gilmore		<u>DraftClonSDZ0529</u>
Kay Vaughan		<u>DraftClonSDZ0530</u>
Adrienne O'Driscoll		<u>DraftClonSDZ0531</u>
Ciaran O'Driscoll		<u>DraftClonSDZ0532</u>
Marie Tweedy		<u>DraftClonSDZ0533</u>
Shay Keogh		<u>DraftClonSDZ0534</u>
Aileen Blackwell Kelly		<u>DraftClonSDZ0535</u>
Michael Jennings		<u>DraftClonSDZ0536</u>
John Vaughan		DraftClonSDZ0537
Amelia Smith		DraftClonSDZ0538
Ann Gunning		DraftClonSDZ0539
	Finnstown Abbey	
John McGivney	Residents Association	DraftClonSDZ0540
Mags Phelan		<u>DraftClonSDZ0541</u>
Ciara McHugh		DraftClonSDZ0542
Terence Phelan		<u>DraftClonSDZ0543</u>
Martina Magee		<u>DraftClonSDZ0544</u>
Geoff Grice		DraftClonSDZ0545
Sandra Coleman		DraftClonSDZ0546
	Larkfield Residents	
Harry Lee	Association	<u>DraftClonSDZ0547</u>
Ciaran & Amanda		
O'Rourke		<u>DraftClonSDZ0548</u>
Sheena Bolger		<u>DraftClonSDZ0549</u>
Cian Fleming		<u>DraftClonSDZ0550</u>
Michael Roche		<u>DraftClonSDZ0551</u>
Ciara Toner		<u>DraftClonSDZ0552</u>
Greg Toner		<u>DraftClonSDZ0553</u>
Jennifer Toner		<u>DraftClonSDZ0554</u>
Bernadette Toner		<u>DraftClonSDZ0555</u>
Lorna Toner		<u>DraftClonSDZ0556</u>
Martin Toner		<u>DraftClonSDZ0557</u>
Liam & Margaret		
McGuinness		<u>DraftClonSDZ0558</u>
Brian McKenna		<u>DraftClonSDZ0559</u>
Sandra McLoughlin		<u>DraftClonSDZ0560</u>
Tara Jenkins		<u>DraftClonSDZ0561</u>
John McLoughlin		<u>DraftClonSDZ0562</u>





Tracey Boland		<u>DraftClonSDZ0563</u>
Aishling Roche		<u>DraftClonSDZ0564</u>
Jennifer McKenna		<u>DraftClonSDZ0565</u>
Dr James Lee		<u>DraftClonSDZ0566</u>
Kathleen McGrath		<u>DraftClonSDZ0567</u>
Stephen Ussher		<u>DraftClonSDZ0568</u>
Sean Gillen		<u>DraftClonSDZ0569</u>
Esther Stafford		<u>DraftClonSDZ0570</u>
Dr Abdul M Jan Jua		<u>DraftClonSDZ0571</u>
Rosaleen Stafford		<u>DraftClonSDZ0572</u>
Sabahuddin Aleem		<u>DraftClonSDZ0573</u>
Tuba Abbas		<u>DraftClonSDZ0574</u>
Annette Thornberry		<u>DraftClonSDZ0575</u>
Nasir Ahmed		<u>DraftClonSDZ0576</u>
Amtal ul Rasheed		<u>DraftClonSDZ0577</u>
Catherine McGlynn		DraftClonSDZ0578
Luke Brennan		DraftClonSDZ0579
Carole Brennan		DraftClonSDZ0580
Quratulain Habib		DraftClonSDZ0581
Gavin Doyle		DraftClonSDZ0582
Tanja Rechnar		DraftClonSDZ0583
Noel Doyle		DraftClonSDZ0584
Breeda Doyle		DraftClonSDZ0585
Simon Doyle		DraftClonSDZ0586
Deirdre Madden		DraftClonSDZ0587
Ghazalah Habib		DraftClonSDZ0588
Laura Madden		DraftClonSDZ0589
Maryam Abbas		DraftClonSDZ0590
Margaret Madden		DraftClonSDZ0591
Peter Madden		DraftClonSDZ0592
Therese Brien		DraftClonSDZ0593
Hiba Tul Slam		DraftClonSDZ0594
Sandra Flood		DraftClonSDZ0595
Sumaira Milik		DraftClonSDZ0596
Sean Flood		DraftClonSDZ0597
Joan Flood		DraftClonSDZ0598
M Flood		DraftClonSDZ0599
Mark Flood		DraftClonSDZ0600
Laura Flood		DraftClonSDZ0601
Catherine Scanlon		DraftClonSDZ0602
Vincent Scanlon		DraftClonSDZ0603
M.Saeed Ullah Seethi		DraftClonSDZ0604
Niall Hare	Kishoge Community College	DraftClonSDZ0605





Sandra Scully		DraftClonSDZ0606



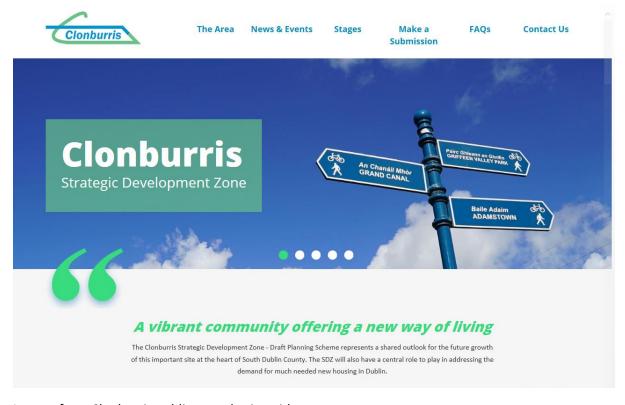






Appendix B: Images of dedicated website and Clonburris public consulation video

Image of www.clonburris.ie homepage

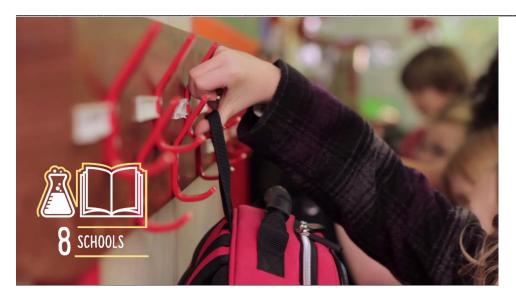


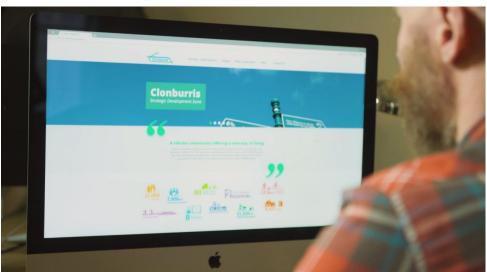
Images from Clonburris public consultation video



Clonburris













Appendix C: Newspaper Notice



PLANNING AND DEVELOPMENT ACT 2000, AS AMENDED PLANNING AND DEVELOPMENT (STRATEGIC ENVIRONMENTAL ASSESSMENT) REGULATIONS 2004-2011

NOTICE OF THE DISPLAY OF BALGADDY-CLONBURRIS STRATEGIC DEVELOPMENT ZONE DRAFT PLANNING SCHEME: (S.I NO. 604 OF 2015)

On the 15th December 2015, the Government designated the lands at Balgaddy-Clonburris as a Strategic Development Zone (SDZ). The SDZ lands, which comprise approximately 280 hectares, are deemed to be of economic and social importance to the State.

South Dublin County Council is specified as the Development Agency for the purposes of the Planning Scheme under the SDZ designation in accordance with Part IX Section 166(3) of the Act. As the designated Agency, South Dublin County Council has prepared a Draft Planning Scheme. It consists of a written statement and plans indicating the type and extent of development to be permitted in the Clonburris SDZ, together with proposals relating to the design of the development, transportation, the provision of services, the minimisation of any adverse impacts on the environment and the provision of amenities, facilities and services for the community. It is accompanied by an Environmental Report and an Appropriate Assessment Stage 1: Screening Report.

Notice is hereby given pursuant to Section 169 of the Planning and Development Act 2000, as amended, Article 179 A of the Planning and Development (Strategic Environmental Assessment) Regulations 2004 and Habitats Directive 92/43/EEC that the display of the Clonburris Strategic Development Zone Draft Planning Scheme, its Environmental Report and Appropriate Assessment Screening Report are available for inspection during normal office opening hours at the following locations from Friday 22nd September to Friday 3rd November 2017 inclusive: SDCC County Hall Tallaght, County Library Tallaght, Civic Offices Clondalkin, Clondalkin Library and Lucan Library. The documents may also be viewed on the website www.clonburris.ie

Public Information Sessions

A series of **Public Information Drop-in Sessions** will be held during the consultation period. Members of the public and interested groups are invited to attend any session. The public information sessions are as follows:

Venue	Date	Time
Civic Offices Clondalkin	Tuesday 3rd October	4pm to 7pm
Clondalkin Library	Thursday 5th October	4pm to 7pm
Lucan Library	Monday 9th October	4pm to 7pm
Tallaght Library	Thursday 12th October	4pm to 7pm

Submissions

Written observations or submissions regarding the Draft Planning Scheme are invited from members of the public and other interested parties including children, or groups or associations representing children.

Submissions and observations should state the name, address, and where relevant details of any organisation, community group etc represented and should be made in writing not later than Friday 3rd November 2017.

Submissions can be made as follows

Online at www.clonburris.ie not later than midnight Friday 3rd November 2017

By post not later than 4pm on Friday 3rd November 2017

Senior Executive Officer

Land Use Planning and Transportation Department

South Dublin County Council

County Hall, Tallaght, Dublin 24

Submissions and observations cannot be accepted in any other format or to any other online or postal address. All submissions received during the above time period will be taken into consideration in deciding upon the Draft Planning Scheme.

ddie Taaffe

Director of Services

Land Use Planning and Transportation Department

Web: www.sdcc.ie





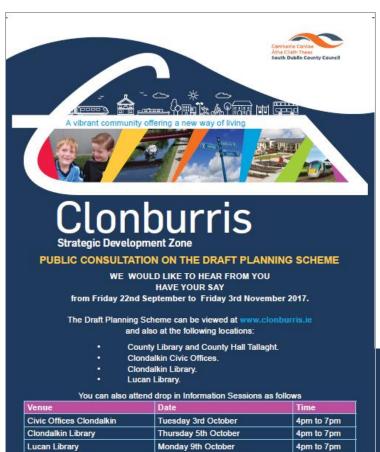






Tallaght Library

Appendix D: Public Consultation Leaflet



Thursday 12th October

Council staff will be available to provide general guidance and answer queries on the Draft Planning Scheme every Wednesday afternoon between 2pm and 4pm at County Hall Tallaght, during the public consultation.







You can make a submission in two ways:



Online:

Or



By Post:

Senior Executive Officer, Forward Planning Section, Land Use Planning & Transportation Department, South Dublin County Council, County Hall, Tallaght, Dublin 24.

Note: The final date for receipt of submissions is Friday 3rd November 2017 by post (4pm) or Online (midnight).





4pm to 7pm



