



# **South Dublin** 2022-2028 **County Development Plan**

Chief Executive's Report  
on the Pre-Draft Consultation

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SOUTH DUBLIN'S FUTURE

November 2020



# **REVIEW OF THE SOUTH DUBLIN COUNTY COUNCIL DEVELOPMENT PLAN 2016-2022 AND PREPARATION OF A NEW COUNTY DEVELOPMENT PLAN 2022-2028**

## **CHIEF EXECUTIVE’S REPORT ON PRE-DRAFT CONSULTATION**

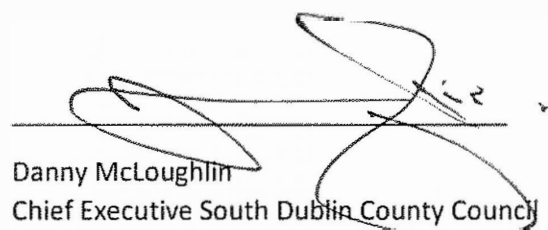
**19<sup>th</sup> of November 2020**

**Land Use Planning and Transportation Department**

**South Dublin County Council**



This Chief Executive's report is provided to the Members in response to the submissions and consultations received during the Pre-Draft consultation of the South Dublin County Development Plan 2022-2028 as required under section 11(4)(a) of the Planning and Development Act 2000 (as amended).



Danny McLoughlin  
Chief Executive South Dublin County Council

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## GLOSSARY

AA:	Appropriate Assessment	DoECLG:	Department of Environment, Community and Local Government
ABT:	Account Based Ticketing	DoCHG:	Department of Culture, Heritage and the Gaeltacht
ABTA:	Area Based Transport Assessment	DC:	District Centre
ACA:	Architectural Conservation Area	DCC:	Dublin City Council
AFA:	Area for Further Assessment (Flooding)	DCU:	Dublin City University
AHB:	Approved Housing Body	DES:	Department of Education and Skills
BER:	Building Energy Rating	DHPLG:	Department of Housing, Planning and Local Government
BID:	Business Improvement District	DLR	Dun Laoghaire Rathdown County Council
BRT:	Bus Rapid Transit	DMA:	Dublin Metropolitan Area
CARO:	Climate Action Regional Office	DMP:	Dublin Mountain Partnership
CCAP:	Climate Change Action Plan	DMURS:	Design Manual for Urban Roads and Streets
CCT:	Correlated Colour Temperature	DTTaS:	Department of Transport, Tourism and Sport
CDP:	County Development Plan	ECFRAM:	Eastern Catchment Flood Risk Assessment and Management Plan
CEUD	Centre for Excellence in Universal Design	EclA:	Ecological Impact Assessment
CFRAM:	Catchment Flood Risk Assessment and Management	EIA:	Environmental Impact Assessment
CMP:	Construction Management Plan	EIAR:	Environmental Impact Assessment Report
CNG:	Compressed Natural Gas	EMRA:	Eastern and Midlands Regional Assembly
CoCo	County Council	EPA:	Environmental Protection Agency
CNG:	Compressed Natural Gas	ESB:	Electricity Supply Board
C02	Carbon Dioxide		
CPO:	Compulsory Purchase Order		
CSO:	Central Statistics Office		
DAA:	Dublin Airport Authority		
DAP:	Drainage Area Plan		
DART:	Dublin Area Rapid Transit		

ESPON:	European Spatial Planning Observation Network	MTC:	Major Town Centre
EU:	European Union	MUD:	Multi-Unit Developments
EV:	Electric Vehicle	NA:	Neighbourhood Area
FCC:	Fingal County Council	NC:	Neighbourhood Centre
GAA:	Gaelic Athletic Association	NDP:	National Development Plan
GDA:	Greater Dublin Area	NPF:	National Planning Framework
GHG:	Greenhouse gas	NHA:	Natural Heritage Area
GI:	Green Infrastructure	NPWS:	National Parks and Wildlife Services
GNI:	Gas Networks Ireland	NSOs	National Strategic Objectives
GSi:	Geological Survey Ireland	NTA:	National Transport Authority
GW:	Gigawatt	OMC:	Operating Management Company
HGV:	Heavy Goods Vehicle	OPR:	Office of the Planning Regulator
HNDA:	Housing Need and Demand Assessment	OPW:	Office of Public Works
IAA:	Irish Aviation Authority	PFRA:	Preliminary Flood Risk Assessment
ICT:	Information and Communications Technology	PPN:	Public Participation Network
IDA:	Industrial Development Authority	PV:	Photovoltaics
IW:	Irish Water	QBC:	Quality Bus Corridor
IWEA:	Irish Wind Energy Association	QGasSP:	Quantitative Greenhouse Gas Impact Assessment Method for Spatial Planning Policy
HSE:	Health Service Executive	RSES:	Regional Spatial Economic Strategy
LAP:	Local Area Plan	RPOs:	Regional Planning Objectives
LDA:	Land Development Agency	RTB	Residential Tenancies Board
LED:	Light-Emitting Diode	SAC:	Special Area of Conservation
LCDC:	Local Community Development Committees	SAAO:	Special Area Amenity Order
LECP:	Local Economic and Community Plan	SD:	South Dublin
LEO:	Local Enterprise Office	SDCC:	South Dublin County Council
MASP:	Metropolitan Area Strategic Plan	SDCYPSC:	South Dublin Children Young People Services Committee



SDGs	Sustainable Development Goals	SUDS:	Sustainable Drainage Systems
SDZ	Strategic Development Zone		The Planning and Development Act, 2000 as amended
SEA:	Strategic Environmental Assessment	The Act	
	Sustainable Energy Authority of Ireland	TII:	Transport Infrastructure Ireland
SEAI:		TUD:	Technological University Dublin
	Local Authority Renewable Energy Strategies	UCD:	University College Dublin
LARES:		UD:	Universal Design
SHD:	Strategic Housing Development	UN:	United Nations
SLO:	Strategic Local Objective	WFD:	Water framework Directive
	Special Planning Policy Requirements		
SPPRs:			



## **PART 1 Introduction**

### **1.0 Introduction**

South Dublin County Council (SDCC) gave notice of its intention to review the existing South Dublin County Development Plan 2016 - 2022 and to prepare a new County Development Plan for the period 2022-2028 on Friday 31<sup>st</sup> July 2020 (see Appendix A Newspaper Notice). Pre-Draft public consultation was undertaken over an 8-week period from 31<sup>st</sup> July to 28<sup>th</sup> September 2020 and written submissions or observations were invited with regard to the review of the current County Development Plan and the preparation of the new South Dublin County Development Plan. The review will take up to two years and will conclude with the adoption of the South Dublin County Development Plan 2022-2028.

This is the first stage of the plan making process. The conversation at this stage is strategic in nature, looking at the big picture issues when it comes to delivering a balanced land use plan – the County Development Plan - for South Dublin County.

The purpose of the Chief Executive's Report is to summarise, and provide an opinion and recommendations based on the issues raised in the submissions and consultation feedback received during the Pre-Draft consultation process. This then informs any directions that the Members may issue to inform the policy, at a strategic level, that should be included in framing the draft Plan as part of its preparation.

At this first stage of the Development Plan process submissions in relation to the zoning of particular land for a particular purpose. Consideration of particular land use zoning will happen at the later Draft Plan stage which will go out to public consultation in July 2021.

The elected members have up to 10 weeks to consider the Chief Executive's Report (with nine extra days to account for the Christmas period).

Pursuant to Section 11 of the Planning and Development Act 2000 (as amended), the Chief Executive's Report on pre-plan consultation must:

- List the persons or bodies who made submissions or observations, as well as any person or bodies consulted.
- Summarise the issues raised in the submissions and during consultations;
- Give the opinion of the Chief Executive to the issues raised, taking account of the proper planning and sustainable development of the area, and any relevant policies or objectives of the Government or of any Minister of the Government and
- State the Chief Executive's recommendations on policies to be included in the draft development plan.

This Chief Executive's Report for the Pre-Draft Consultation Stage of the South Dublin County Council 2022 -2028 Development Plan is hereby submitted to the members of the Planning Authority for consideration.

## **1.1 Legislative background**

Section 11(4)(d) of the Act stipulates that following the consideration of the Chief Executive's Report on submissions for the Pre-Draft consultation stage (issued to Members as this report on 19 November 2020), that the Members of the Local Authority may issue Directions to the Chief Executive regarding the preparation of the Draft County Development Plan. The legislation outlines that any such Directions shall be:

1. Strategic in nature,
2. Consistent with the draft core strategy,
3. and shall take account of the statutory obligations of the Local Authority,
4. and any relevant policies or objectives for the time being of the Government, or of any Minister of the Government.

In accordance with this statutory requirement, the Planning Authority have prepared a framework, set out in Part 2 of this CE Report, to guide the development of the draft core strategy, and to aid the Members when issuing any Directions ensuring that for this stage of the Plan they are 'strategic in nature' and consistent with the parameters set by the national and regional planning frameworks.

In issuing directions, the Members are restricted to considering the proper planning and sustainable development of the area to which the Development Plan relates. After this stage, the Draft Development Plan will be prepared and submitted to the Elected Members for their consideration.

## **1.2 Format of Chief Executive's Report**

The Chief Executive's report is set out in four parts. Part 1 sets out the general introductory sections including the legislative background, the planning policy context and challenges, a summary of pre-draft consultations carried out, and outlines the next steps in the plan making process.

Part 2 of the report sets out the Framework for the Draft Core Strategy which sets out an evidence-based strategy for the future spatial development of the County.

Part 3 of the report sets out in tabular format the Chief Executive's Strategic Recommendations for policies to be included within the Draft Plan. The recommendations have been informed by the issues raised in the submissions received and consultations and are listed in tabular format under the relevant strategic headings.

Part 4 of the report sets out the summaries, Chief Executive's opinion and recommendations under each high-level strategic issue. A Miscellaneous section addressed submissions which did not form part of the strategic issues sections. This is followed by summaries and the Chief

Executive's opinion on specific issues relating to each of the seven Neighbourhood Areas. Strategic recommendations for the neighbourhood areas are included under the relevant high-level strategic issue.

Part 4 concludes with a summary of the stakeholder workshops detailing the six meetings carried out as part of the consultation process and providing a Chief Executive's opinion and recommendation.

Appendices are provided which include documents and information relevant to the development of the Chief Executive's Report including the summaries of issues raised in the submissions.

A list of all the persons/bodies that made submissions or observations is provided in Table 1 below together with a reference number. The submission or observation reference number has been hyperlinked via the Consultation Portal and each submission can be viewed by clicking on the reference number.

**Table 1 – List of Submissions**

<b>Person/Author</b>	<b>Company/Consultant (if applicable)</b>	<b>Body Represented (if applicable)</b>	<b>Ref (Url)</b>
Waste Policy & Resource Efficiency Division	Department of Communications, Climate Action and Environment		<a href="#">SD-C147-1</a>
Proinsias Fhlannchadha			<a href="#">SD-C147-2</a>
Alison Sheppard			<a href="#">SD-C147-3</a>
Donal Pat Cleary			<a href="#">SD-C147-4</a>
Conor Mulligan			<a href="#">SD-C147-5</a>
Ross Killen			<a href="#">SD-C147-6</a>
Joe Cully			<a href="#">SD-C147-7</a>
Amanda Higgins			<a href="#">SD-C147-8</a>
Colin Boyle			<a href="#">SD-C147-9</a>
Karen Keatinge			<a href="#">SD-C147-10</a>
Asa holmstrom holmstrom			<a href="#">SD-C147-11</a>
venkata subhash babu medisetty			<a href="#">SD-C147-12</a>
Lema Lo			<a href="#">SD-C147-13</a>
Joe Cully			<a href="#">SD-C147-14</a>
Tony O'Hara			<a href="#">SD-C147-15</a>
Rathcoole Community Council			<a href="#">SD-C147-16</a>
Rathcoole Community Council			<a href="#">SD-C147-17</a>
Jos Fullam			<a href="#">SD-C147-18</a>
Joanne Fitzpatrick			<a href="#">SD-C147-19</a>
Sheila & John Trant	JP & M Doyle		<a href="#">SD-C147-20</a>
Jim Brown	JP & M Doyle		<a href="#">SD-C147-21</a>

Constantin Roman			<a href="#">SD-C147-22</a>
Hilda Childs	JP & M Doyle		<a href="#">SD-C147-23</a>
Niamh Stephens			<a href="#">SD-C147-24</a>
Thomas Gallagher			<a href="#">SD-C147-25</a>
Prismline Ltd	David Mulcahy Planning Consultants Ltd		<a href="#">SD-C147-26</a>
Aoife Harrington			<a href="#">SD-C147-27</a>
Shane O'Brien			<a href="#">SD-C147-28</a>
Mick Mac Aree	National Transport Authority (NTA)		<a href="#">SD-C147-29</a>
Rathcoole Community Council			<a href="#">SD-C147-30</a>
Jim Conway	Eastern and Midland Regional Assembly (EMRA)		<a href="#">SD-C147-31</a>
Tracy Walsh			<a href="#">SD-C147-32</a>
Matthew Lysaght			<a href="#">SD-C147-33</a>
Michael Griffin		WORK Residents Association	<a href="#">SD-C147-34</a>
Muireann O'Dea		Dublin Cycling Campaign	<a href="#">SD-C147-35</a>
Transport Infrastructure Ireland (TII)	Transport Infrastructure Ireland (TII)		<a href="#">SD-C147-36</a>
Jean O'Brien			<a href="#">SD-C147-37</a>
Cian O'Mahony	Environmental Protection Agency (EPA)		<a href="#">SD-C147-38</a>
James McNerney			<a href="#">SD-C147-39</a>
Alan Creaner			<a href="#">SD-C147-40</a>
Flood Relief and Risk Management Division	Office of Public Works (OPW)		<a href="#">SD-C147-41</a>
Deirdre McMullan McMullan			<a href="#">SD-C147-42</a>
Orla Daly			<a href="#">SD-C147-43</a>
Rebuild the Silver Bridge			<a href="#">SD-C147-44</a>
BCKD Ltd	Simon Clear & Associates		<a href="#">SD-C147-45</a>
Dara Larkin			<a href="#">SD-C147-46</a>
Jennifer Doyle			<a href="#">SD-C147-47</a>
Sue Dorgan		Millrace Residents association (MRA)	<a href="#">SD-C147-48</a>
Niall Charleton			<a href="#">SD-C147-49</a>
Frank Kerins	James McNerney Planning Consultant		<a href="#">SD-C147-50</a>
Paula Lee			<a href="#">SD-C147-51</a>
Vincent Hyland			<a href="#">SD-C147-52</a>
Sinead O'Malley, Aoife McCarthy	Coillte		<a href="#">SD-C147-53</a>

Fergal Britton		ReNewcastle Community Group	<a href="#">SD-C147-54</a>
Sean Ward		Orwell Park (Templeogue) Residents Association	<a href="#">SD-C147-55</a>
Paul Murphy TD			<a href="#">SD-C147-56</a>
Niamh McDonald	Irish Water (IW)		<a href="#">SD-C147-57</a>
James McNerney			<a href="#">SD-C147-58</a>
Fergal Swaine			<a href="#">SD-C147-59</a>
Tesco Ireland Limited	Muireann Duffy – Avison Young		<a href="#">SD-C147-60</a>
South Dublin Chamber			<a href="#">SD-C147-61</a>
An Post	Muireann Duffy – Avison Young		<a href="#">SD-C147-62</a>
Hibernia REIT	Thornton O'Connor Town Planning		<a href="#">SD-C147-63</a>
Cairn Homes Properties Ltd			<a href="#">SD-C147-64</a>
Romeville Developments Ltd	Gareth Stanley – Virtus		<a href="#">SD-C147-65</a>
Jennifer Hannon			<a href="#">SD-C147-66</a>
James McNerney			<a href="#">SD-C147-67</a>
Robert Shevlin			<a href="#">SD-C147-68</a>
Ne Graver		Four Districts Day Care CLG	<a href="#">SD-C147-69</a>
Rachel O'Callaghan			<a href="#">SD-C147-70</a>
Kemi Obi			<a href="#">SD-C147-71</a>
Fiadh Ní Dhonnchadha			<a href="#">SD-C147-72</a>
Knocklyon Network			<a href="#">SD-C147-73</a>
Hugh Durkin	Savills		<a href="#">SD-C147-74</a>
Hugh Durkin, Nigel Smith	Savills		<a href="#">SD-C147-75</a>
National Flight Centre Ltd			<a href="#">SD-C147-76</a>
Thomas Finlay			<a href="#">SD-C147-77</a>
RROLR Resident's Group			<a href="#">SD-C147-78</a>
Withdrawn			<a href="#">SD-C147-79</a>
James McNerney			<a href="#">SD-C147-80</a>
Gordon Place			<a href="#">SD-C147-81</a>
Declan Hanley			<a href="#">SD-C147-82</a>
Geraldine Kelly			<a href="#">SD-C147-83</a>
Julie Prenderville			<a href="#">SD-C147-84</a>
Eugene Wisely			<a href="#">SD-C147-85</a>
Four Districts Woodland Habitat Group			<a href="#">SD-C147-86</a>
Deirdre Tierney			<a href="#">SD-C147-87</a>
Una Ruddock			<a href="#">SD-C147-88</a>
Glenasmole Concerned Residents & Farmers Group			<a href="#">SD-C147-89</a>

Marie Petiet			<a href="#">SD-C147-90</a>
John O'Leary		Beechwood Lawns Coolamber and Maple Residents Association	<a href="#">SD-C147-91</a>
John Shanahan			<a href="#">SD-C147-92</a>
Susan Healy			<a href="#">SD-C147-93</a>
Elizabeth Hickey			<a href="#">SD-C147-94</a>
Dublin Bus			<a href="#">SD-C147-95</a>
Public Participation Network			<a href="#">SD-C147-96</a>
BOC Gases	Savills		<a href="#">SD-C147-97</a>
Kar Kin Lim			<a href="#">SD-C147-98</a>
Ne Graver			<a href="#">SD-C147-99</a>
Olive O'Malley			<a href="#">SD-C147-100</a>
Brian Sherry			<a href="#">SD-C147-101</a>
Niall Charleton			<a href="#">SD-C147-102</a>
Litter Mugs			<a href="#">SD-C147-103</a>
Donal & Shane Griffin	Gibbons & Associates		<a href="#">SD-C147-104</a>
James McInerney			<a href="#">SD-C147-105</a>
Green Party Tallaght		South Dublin County Greens	<a href="#">SD-C147-106</a>
Roadstone Limited	SLR Consulting Ireland		<a href="#">SD-C147-107</a>
Gas Networks Ireland			<a href="#">SD-C147-108</a>
Hines Real Estate Ireland	Muireann Duffy – Avison Young		<a href="#">SD-C147-109</a>
CLlr Teresa Costello			<a href="#">SD-C147-110</a>
Finnstown Castle Hotel	Whyte Planning Consultants		<a href="#">SD-C147-111</a>
Cumann Luthcleas Gael Coiste Átha Cliath	Jim Brogan Planning and Development Consultant		<a href="#">SD-C147-112</a>
John Stephens			<a href="#">SD-C147-113</a>
Finnstown Castle Hotel	Whyte Planning Consultants		<a href="#">SD-C147-114</a>
Lisa English	EirGrid		<a href="#">SD-C147-115</a>
Alan Hanlon	Department of Education & Skills		<a href="#">SD-C147-116</a>
Alistair Mullan			<a href="#">SD-C147-117</a>
Cape Wrath Hotel Unlimited	Tom Phillips + Associates		<a href="#">SD-C147-118</a>
John Lahart TD			<a href="#">SD-C147-119</a>
Four Districts Wild Habitat Group			<a href="#">SD-C147-120</a>
Louise Byrne	daa (Dublin Airport Authority)		<a href="#">SD-C147-121</a>
Proinsias Fhlannchadha			<a href="#">SD-C147-122</a>
John and Frank Gargan	RW Nowlan & Associates		<a href="#">SD-C147-123</a>
Annette O'Connor		Resident Association for	<a href="#">SD-C147-124</a>



		Red Cow Cottages/ Woodfarm Cottages/ St. Fintan's Tce & Glenside Villas, Palmerstown Village	
Ray and Eleanor McBennett	RW Nowlan & Associates		<a href="#">SD-C147-125</a>
Mambas Limited	Simon Clear & Associates		<a href="#">SD-C147-126</a>
Sally Graver			<a href="#">SD-C147-127</a>
John Lahart			<a href="#">SD-C147-128</a>
Ger O'Halloran			<a href="#">SD-C147-129</a>
Glenn Johnston			<a href="#">SD-C147-130</a>
Eventpointe Ltd & Mambas Limited	Simon Clear & Associates		<a href="#">SD-C147-131</a>
Eamon Brennan			<a href="#">SD-C147-132</a>
Cllr Teresa Costello			<a href="#">SD-C147-133</a>
Cllr Teresa Costello			<a href="#">SD-C147-134</a>
NVD Limited	John Spain Associates		<a href="#">SD-C147-135</a>
Niall Healy			<a href="#">SD-C147-136</a>
Hugh McGreevy and Sons & Tierra Ltd	John Spain Associates		<a href="#">SD-C147-137</a>
Rohan Holdings Ltd	Future Analytics Consulting Ltd		<a href="#">SD-C147-138</a>
Fergal Mullally			<a href="#">SD-C147-139</a>
Wilson's Auctions	BMA PLANNING		<a href="#">SD-C147-140</a>
Ross O'Mullane			<a href="#">SD-C147-141</a>
Intrust Properties Company Limited By Guarantee	BMA PLANNING		<a href="#">SD-C147-142</a>
Michael Murphy	Department of Culture, Heritage and the Gaeltacht		<a href="#">SD-C147-143</a>
Anne Marie O'Connor	Office of the Planning Regulator		<a href="#">SD-C147-144</a>
Joe Gilligan			<a href="#">SD-C147-145</a>
Ken O'Connor			<a href="#">SD-C147-146</a>
South Dublin County Sports Partnership			<a href="#">SD-C147-147</a>
Brendan Heneghan			<a href="#">SD-C147-148</a>
Ross Boyd			<a href="#">SD-C147-149</a>
Audrey Warren	South Dublin Children Young People Services Committee		<a href="#">SD-C147-150</a>
Stanley Asphalt Limited	BMA PLANNING		<a href="#">SD-C147-151</a>

Fonthill Commercial Developments Ltd	John Spain Associates		<a href="#">SD-C147-152</a>
Maplewood Residential	Armstrong Fenton Associates		<a href="#">SD-C147-153</a>
Colm Neville Construction UC	Simon Clear & Associates		<a href="#">SD-C147-154</a>
Kelland Homes Ltd	Armstrong Fenton Associates		<a href="#">SD-C147-155</a>
Dublin Chamber			<a href="#">SD-C147-156</a>
CLlr Yvonne Collins			<a href="#">SD-C147-157</a>
Teresa Carroll			<a href="#">SD-C147-158</a>
Quintain Developments Ireland Limited (Michael Hynes)			<a href="#">SD-C147-159</a>
Irish Wildlife Trust			<a href="#">SD-C147-160</a>
O'Flynn Group	McCutcheon Halley Chartered Planning Consultants		<a href="#">SD-C147-161</a>
Sue Dorgan		Millrace Residents association (MRA)	<a href="#">SD-C147-162</a>
Wellsea Properties Ltd	Hughes Planning & Development Consultants		<a href="#">SD-C147-163</a>
Joan Moore, Andrina Wafer		Lower Kimmage Road Residents' Association (LOKRA)	<a href="#">SD-C147-164</a>
Jonny Edgar			<a href="#">SD-C147-165</a>
Castlethorn	Stephen Little & Associates		<a href="#">SD-C147-166</a>
Print and Display Limited and Downtree Investments Limited, PD Visual Limited (T/A P&D Visual) and Westside Press Limited	Gravis Planning		<a href="#">SD-C147-167</a>
Saggart Village Residents' Association			<a href="#">SD-C147-168</a>
Pádraig MacOitir		South Dublin Conservation Society	<a href="#">SD-C147-169</a>
Daragh Cagney			<a href="#">SD-C147-170</a>
Pauline Foster		Recorders Residents Association	<a href="#">SD-C147-171</a>
John Lahart TD			<a href="#">SD-C147-172</a>
CLlr Pamela Kearns			<a href="#">SD-C147-173</a>
National Disability Authority			<a href="#">SD-C147-174</a>
John Lahart			<a href="#">SD-C147-175</a>

Saggart Village Residents' Association			<a href="#">SD-C147-176</a>
Fiona Butler			<a href="#">SD-C147-177</a>
Albert Perris			<a href="#">SD-C147-178</a>
Development 8	John Spain Associates		<a href="#">SD-C147-179</a>
Finnstown Castle Hotel	Whyte Planning Consultants		<a href="#">SD-C147-180</a>
Cllr Pamela Kearns			<a href="#">SD-C147-181</a>
Finnstown Castle Hotel	Whyte Planning Consultants		<a href="#">SD-C147-182</a>
Aidan Doyle			<a href="#">SD-C147-183</a>
Colm Walsh			<a href="#">SD-C147-184</a>
Gerard Crowley	Electricity Supply Board (ESB)		<a href="#">SD-C147-185</a>
Not Here Not Anywhere			<a href="#">SD-C147-186</a>
Su Murray			<a href="#">SD-C147-187</a>
Cllr Teresa Costello			<a href="#">SD-C147-188</a>
Irish Wind Energy Association (IWEA)			<a href="#">SD-C147-189</a>
Cllr Eoin Ó Broin			<a href="#">SD-C147-190</a>
Denise Delappe		Parkwood Residents Association	<a href="#">SD-C147-191</a>
Andrew Dunne		Clondalkin Celtic FC	<a href="#">SD-C147-192</a>
Tom & Chris Coleman			<a href="#">SD-C147-193</a>
Tallaght Community Council			<a href="#">SD-C147-194</a>
Mairéad O'Connor			<a href="#">SD-C147-195</a>
Paul Kelly			<a href="#">SD-C147-196</a>
South Dublin Environmental Network			<a href="#">SD-C147-197</a>
Cllr Carly Bailey			<a href="#">SD-C147-198</a>
Withdrawn			<a href="#">SD-C147-199</a>
Tallaght Community Council			<a href="#">SD-C147-200</a>
Tallaght Community Council			<a href="#">SD-C147-201</a>
Cllr Alan Hayes			<a href="#">SD-C147-202</a>
Betsy Omidvaran			<a href="#">SD-C147-203</a>
John Duffin		Templeogue Tidy Towns, Austin Clarke Park & Bridge Working Party	<a href="#">SD-C147-204</a>
Fergal Scully			<a href="#">SD-C147-205</a>
Patrick Healy			<a href="#">SD-C147-206</a>
Monica McGill			<a href="#">SD-C147-207</a>
Tallaght Community Council			<a href="#">SD-C147-208</a>
Jon Norton			<a href="#">SD-C147-209</a>

Tallaght Community Council			<a href="#">SD-C147-210</a>
Tallaght Community Council			<a href="#">SD-C147-211</a>
Audrey Crone			<a href="#">SD-C147-212</a>
Cllr Shane Moynihan			<a href="#">SD-C147-213</a>
David Kennedy			<a href="#">SD-C147-214</a>
Patrick Leonard	An Taisce, South County Dublin Local Association		<a href="#">SD-C147-215</a>
Declan & Annette Hughes			<a href="#">SD-C147-216</a>
Mark Lynch	Edmonstown Golf Club		<a href="#">SD-C147-217</a>
Hilary Boylan			<a href="#">SD-C147-218</a>
Sean O'Donnell, Sean Lillis			<a href="#">SD-C147-219</a>
Martin Purcell			<a href="#">SD-C147-220</a>
Michael Bennett			<a href="#">SD-C147-221</a>
Keep Ireland Open			<a href="#">SD-C147-222</a>
Michael & Geraldine Carr			<a href="#">SD-C147-223</a>
Edward Fox	Cunnane Stratton Reynolds		<a href="#">SD-C147-224</a>
Paul Sweeney			<a href="#">SD-C147-225</a>
Orlagh GP Limited C/O Lahiff & Company	Brock McClure		<a href="#">SD-C147-226</a>
Alan Kelly	Land Development Agency		<a href="#">SD-C147-227</a>
Shane Dineen	Faite Ireland- National Tourism Development Authority		<a href="#">SD-C147-228</a>
Diarmuid Phelan			<a href="#">SD-C147-229</a>

\*Please Note: There were 227 number submissions in total. Two number submissions were Withdrawn (SD-C147-79 & SD-C147-199).

\*\*Please Note: The submission references in this Chief Executive's Report comprise of a reference number (as per the above Table) together with either the name of the Person/Author, Company/Consultant or Body Represented.

### 1.3 Pre-draft consultation - Summary

The pre-draft public consultation followed a well-planned and laid out strategy (further details can be viewed in Appendix C) resulting in 227 submissions, two additional submissions were withdrawn. The following is a short synopsis of the results of the public consultation.

#### The Mayor's Launch

The Mayor's launch on the 31<sup>st</sup> July 2020 was watched by 87 people via Facebook and by 239 people on Instagram (live). Although 87 people watched the live launch in full, 1,139 people clicked on the link and listened for up to 10 seconds. This means that at least 1,139 people had been made aware, via Facebook, that the County Development Plan was being launched on the 31<sup>st</sup> July 2020. 1,326 people saw the tweet of the Mayor's Launch 31<sup>st</sup> July 2020 via Twitter. The Launch images and videos had a further reach of 1,466 on Instagram.

On the day, 3,931 people were made aware of the launch of the County Development Plan process via Social Media.

### **Public Webinars**

Two Public Webinars were held during September 2020: 1) a morning webinar on Thursday 3<sup>rd</sup> September and 2) an evening webinar on 16<sup>th</sup> September 2020. The webinars were hosted by the Senior Executive Planner and comprised presentations undertaken by South Dublin senior staff using their expertise and knowledge to cover all eight themes contained within the Issues Papers. The webinars ended with a questions and answers session. Fifty-four people attended the first webinar and seventy three questions were raised. Forty-seven people attended the second webinar, which raised seventy eight questions.

### **Social Media**

For clarity: 'Impressions' means the number of times people saw the tweet/post and 'Total Engagement' means the total number of times people who interacted in some way with the Tweet/post. 'Reach' means the number of people reached by the post/tweet.

#### **TWITTER**

Over the entire 8-week public consultation there were a total of 83,891 'Impressions' with a 'Total engagement' of 2,856. 300 links were clicked, 154 retweets made and 173 likes. Of the 'Impressions' 22,416 of these were specifically related to the Virtual Consultation Room; 538 of these resulted in 'Total Engagement'.

#### **FACEBOOK**

The Facebook posts had an overall reach of 65,972 people, with 1,683 of these resulting in total engagements. 49 comments were made, and 32 posts shared.

The Virtual Room posts had a total reach of 18,602, resulting in 308 engagements.

#### **INSTAGRAM**

The Instagram posts had an overall reach of 12,020 people. 1,651 of this reach specifically related to the Virtual Consultation Room.

### **Virtual Consultation Room**

A Virtual Consultation Room was created within the development plan website, to offer an alternative to visiting a library or community hall. It was created to be visual and user friendly and was designed to encourage engagement with the process by viewing consultation posters and information on the eight themes but most importantly offering a means of talking to planning staff via a dedicated phone line.

### **Stakeholder Meetings**

Six Stakeholder Consultation Webinars were organised. The purpose of these webinars was to facilitate a cross sector discussion in relation to the medium to long term future of South

Dublin County and the ‘big picture’ issues that might impact on its future growth. The meetings were very well attended and attracted a wide cross section of the County’s stakeholders. [see Stakeholder Report in Part 4 section 4.4 of this report]

### **Open Sessions**

Open sessions with planners were organised on each Tuesday afternoon during the consultation period and held at County Hall, Tallaght. These were organised by appointment only and were generally well attended.

Open sessions with planners were organised on 26<sup>th</sup> August 2020 and Thursday 17<sup>th</sup> September 2020 at Tallaght Library. These were on a drop-in basis and gave the public access to planners without having to book a timeslot. Attendance at each of these sessions were quite low, this was highly likely to be due to COVID-19 restrictions in place at the time.

Open sessions also included planning staff being available to take calls on Thursday afternoons and Thursday evenings during the public consultation via the HUNT line accessible from the Virtual Consultation Room.

### **Printed Media**

The printed media was used to great advantage in disseminating information on the public consultation. Advertisements were placed in both the local and national press. An article appeared in the Citizen’s Newsletter, which is issued to every household within the County and The Echo Newspaper ran eight weekly articles covering each of the themes contained within the Issues Papers.

### **Briefing Sessions**

In addition to the public consultation, briefing sessions were provided to the Members and to the Land Use, Transportation and Planning SPC on the pre-draft stage of the Plan.

## **1.4 Planning Policy Context/Challenges**

### **Policy Context**

The new Draft Plan is being prepared in a new era for planning policy set out under the Project Ireland 2040 National Planning Framework (NPF) and National Development Plan, the Eastern Midlands Regional Spatial and Economic Strategy (RSES) and the Dublin Metropolitan Area Strategic Plan (MASP). These documents set the key National and Regional framework for South Dublin. In addition, there have been new planning guidelines published since the South Dublin Development Plan 2016-2022 was adopted. These planning guidelines have put in place guidance which emphasises the drive towards more compact growth, generally encouraging higher densities in our cities and towns. These new guidelines include special planning policy requirements (SPPRs) which planning authorities are required to apply. Guidelines with SPPRs include the Urban Development and Building Heights Guidelines and

the Apartment Design Guidelines, both published in 2018. SPPRs take precedence over any conflicting policy of development plans.

## **Challenges**

The NPF, published in 2018, includes the requirement for each Local Authority to prepare a Housing Needs Demand Assessment (HNDA) to inform the Housing Strategy. The HNDA is an evidenced based policy tool to inform, amongst other aspects, the need for a certain mix of residential unit type and tenure. The RSES notes that in the case of Dublin (Four Local Authorities), the HNDA may be at a metropolitan scale having regard to inter-county and inter-regional settlement interactions. However, statutory guidelines on HNDA's have not been published to date. In addition, updated Section 28 Ministerial Guidelines on County Development Plans which may further inform the HNDA and other aspects of the plan preparation process are in preparation by the Department but are not yet published. Therefore, preparation for this draft Development Plan is underway based on existing guidelines and the most current demographic information available.

While every effort will be made to incorporate new guidelines into the preparation of the draft Plan this may not be possible within the statutory timeframes which have to be met.

COVID-19 is a global health issue which has had and will continue to have wide ranging social and economic impacts for the foreseeable future. Planning, as an essential service, will continue to operate during the 5 levels set by Government unless otherwise stated. The virus has resulted in changes to consultation with less face-to-face and more digital tools as seen during the Pre-Draft Stage of the Plan. It is anticipated that this approach to consultation will continue over the course of preparing the Draft Plan until a vaccine is found and distributed amongst the wider population. As indicated in the following sections, the Planning Authority are satisfied that the consultation process undertaken during Covid restrictions engaged comprehensively with our citizens and stakeholders, noting that the number of submissions received represented an increase of over 90% on the same stage of the process in 2014.

The Draft Plan is being prepared in the context of global economic uncertainty. Every effort will be made to ensure that the Plan facilitates economic resilience and recovery.

## **1.5 Next Steps**

The elected members have up to 10 weeks (with an additional 9 extra days to account for the Christmas period) from the 19<sup>th</sup> November 2020 to consider this Chief Executive's Report on Pre-Draft submissions and consultations and issue directions. Any such directions must issue by 4th February 2021.

### **1.5.1 Members Briefings**

Members will be further briefed in relation to the review process prior to the special development plan meetings in January and February of 2021. There will be an opportunity

to discuss the contents of the Chief Executive's Report at the briefings and the approach to motions.

### **1.5.2 Consideration of Chief Executive's Report**

Special meetings of South Dublin County Council will take place to consider the CE Report and recommendations and will take account of Covid restrictions. It is intended that these meetings, at which the Members may issue strategic direction, will commence on the 27<sup>th</sup> January 2021 with the final one on the 4<sup>th</sup> February 2021. Dates will be confirmed in the coming weeks.

Pursuant to the requirements of Section 11 (4) of the Planning and Development Act (as amended) South Dublin County Council will consider the Chief Executive's Report on Pre-Draft Plan Consultation at this meeting and following consideration of the report may issue directions to the Chief Executive regarding the preparation of the Draft Plan.

Motions relating to the meeting must be provided at least 14 days in advance of the first meeting, the final date for all motions being the 6<sup>th</sup> January.

### **1.5.3 Preparation of the Draft Plan**

Not later than 12 weeks after the consideration of the Chief Executive's Report and the issuing of directions by Members, the Chief Executive is required to prepare the Chief Executive's Draft Plan for consideration of the members.

It is envisaged that the Chief Executive's Draft Plan will be submitted to the members on 28<sup>th</sup> April 2021 for their consideration. The Members are required to consider the Chief Executive's Draft Plan within 8 weeks of its submission to them and approve the Draft Plan to go out on public display. Special Meetings of the Council will take place in June 2021 to allow for consideration of the Draft Plan.

Within 2 weeks of consideration of the Draft Plan by members, the Chief Executive is required to publish notice of the preparation of the 'Draft South Dublin County Development Plan 2022-2028' to go out on display in early July 2021.

The Draft South Dublin County Development Plan 2022-2028 will be on public display for a period of 10 weeks from July to September 2021. The Council will engage in consultation with stakeholders and the public over this 10- week period.

The next steps will be updated on the Development Plan website, available at:

<https://www.sdcc.ie/en/devplan2022/>



## Part 2 – Framework for the Draft Core Strategy

### 2.1 Introduction

The purpose of the Core Strategy is to set out an evidence-based strategy for the future spatial development of the County. The central premise of the core strategy is to provide a transparent evidence-based rationale for the amount of land proposed to be zoned specifically for housing, population and employment or mixed-use land to service the projected demand.

This demand is all in the context of National and Regional planning policy over the lifetime of the Development Plan which envisages an additional 50,000 population from 2016-2031 and 46,518 from 2016 up to 2028 under a high growth scenario. Based on housing completions up to mid-2020, it is estimated that the population of the County has grown by 11,500 persons since 2016. Further information regarding population targets for South Dublin and the different scenarios is set under Table 1 and 2 below under sub-section 'Population, Employment Growth and Land Availability' of this report.

Section 11(4)(d) of the Act stipulates that following the consideration of the Chief Executive's Report on submissions for the Pre-Draft consultation stage (i.e. this report), that the Members of the Local Authority may issue Directions to the Chief Executive regarding the preparation of the Draft County Development Plan. The legislation outlines that any such Directions shall be for the purposes of delivering objectives and policies for an overall strategy for the proper planning and sustainable development of the area and shall be:

5. Strategic in nature,
6. Consistent with the draft core strategy,
7. shall take account of the statutory obligations of the Local Authority,
8. and any relevant policies or objectives for the time being of the Government, or of any Minister of the Government

In accordance with this statutory requirement, the Planning Authority have outlined the parameters for the draft core strategy to aid the Members when issuing any Directions ensuring that for this stage of the Plan directions are 'strategic in nature' and consistent with the parameters set by the national and regional planning frameworks.

**The planning legislation is quite clear that at this stage of the Plan process that zoning of land for any particular purpose shall not be considered.** That level of detail can be considered at the Draft Plan stage.

Since the adoption of the current South Dublin Development Plan there have been significant changes in planning legislation reflecting the adoption at national level of the National Planning Framework and the Eastern and Midlands Regional Spatial and Economic Strategy.

The Planning Authority must be consistent with these higher-level policy documents and their objectives. The Office of the Planning Regulator has also been established since the last plan was adopted. One of the core functions of that office is to ensure that there is consistency in County Development Plans with national and regional planning policy and objectives. In this regard, the Planning Regulator, as a prescribed body, is charged with monitoring the preparation of Development Plans and is obliged to make a submission to the Planning Authority providing their views on the plan's alignment with higher level policy. The Planning Regulator has powers, in conjunction with the Minister, to issue directions to the local authority where deemed necessary.

## **2.2 Strategic Context**

The parameters within which the Planning Authority must work when drafting the core strategy are defined within National and Regional planning policy frameworks comprising: Project Ireland 2040 National Planning Framework; the Eastern and Midlands Regional Spatial and Economic Strategy 2019-2031, including the Dublin Metropolitan Area Strategic Plan; and Section 28 Ministerial Guidelines including Specific Planning Policy Requirements outlined under subsection (1) of Section 28 of The Act. Each document and the parameters they set are discussed in turn as follows:

### **National Planning Framework, Project Ireland 2040 (2018)<sup>1</sup>**

The National Planning Framework (NPF), supported by the National Development Plan (NDP), is the Government's high-level strategic plan for shaping the future growth and development of the country to the year 2040.

The NPF has a clear development outcome to create compact growth within the existing urban footprint creating a priority to develop brownfield / infill development first before considering greenfield lands. As a result, this approach seeks to make use of existing infrastructure and encourage more people, jobs and activity into existing built-up urban and settlement areas.

Accordingly, it is a target of the NPF that 50% of future national population and employment growth is focused in the existing five cities and their suburbs (NPO 2a). In terms of housing, the NPF outlines that at least half (50%) of all new homes that are targeted in the cities are within their existing built-up footprints. For settlements other than the cities and their suburbs, at least 30% of all new homes are to be delivered within their existing built-up footprints (NPO 3c).

On this basis, the parameters set for the draft core strategy will focus future population and employment in a manner that complies with the National Policy Objectives of the NPF which includes the above percentages as they apply to South Dublin.

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<sup>1</sup> External Link to the National Planning Framework - <https://npf.ie/wp-content/uploads/Project-Ireland-2040-NPF.pdf>

The NPF sets out a requirement for zoning land to be tiered (NPO 72a) which is informed by an infrastructural assessment of the land. Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the Development Plan. When considering zoning lands for development purposes that require investment in service infrastructure, Planning Authorities will make a reasonable estimate of the full cost of delivery of the specified services and prepare a report, detailing the estimated cost at draft and final plan stages (NPO 72b). Where zoned land cannot be serviced within the life of the relevant plan, the NPF states that such lands should not be zoned for development (NPO 72c).

Circular Letter PSSP6/2010 and Guidance note issued by the Department of Housing outlines that strategic long-term sites (Strategic Development Zones of Adamstown and Clonburris or major regeneration sites, of Naas Road and Tallaght) should form part of the strategic long-term zoned land bank within the Development Plan as they may take a number of development plan cycles (i.e. 10 to 15+ years) to be realised.

## **Eastern Midlands Regional Spatial and Economic Strategy 2019 - 2031<sup>2</sup>**

The Eastern and Midlands Regional Spatial and Economic Strategy 2019 – 2031 (RSES) is a regional strategic plan which sets out a settlement and economic growth strategy to ensure the needs of the Region's citizens such as access to employment opportunities and services, ease of travel and overall well-being are met.

This approach is guided by sixteen Regional Policy Objectives which are aligned with the UN Sustainable Development Goals, the EU thematic objectives and the National Strategic Outcomes (NSOs) of the NPF to set the framework for City and County Development Plans. By ensuring this alignment is maintained to local level, the Regional Assembly can assist local authorities in aligning with EU priorities to leverage funding and partnership opportunities.

Under the RSES, RPO 3.2 requires local authorities in preparing their core strategies to set out measures to achieve compact urban development targets of at least 50% of all new homes within or contiguous to the built up area of Dublin City and Suburbs and a target of at least 30% for other urban areas.

The RSES, through the analysis of an asset-based assessment of settlements and a recognised Functional Urban Area produced by a city/town or village, devised a settlement strategy for the Region. The list of these settlements comprises seven levels with Dublin City & Suburbs forming the top-level settlement for the region. For South Dublin, Dublin City & Suburbs is the only regionally identified settlement within the County. This area is defined by the Central Statistics Office (CSO)<sup>3</sup>, as illustrated under Figure 1 above.

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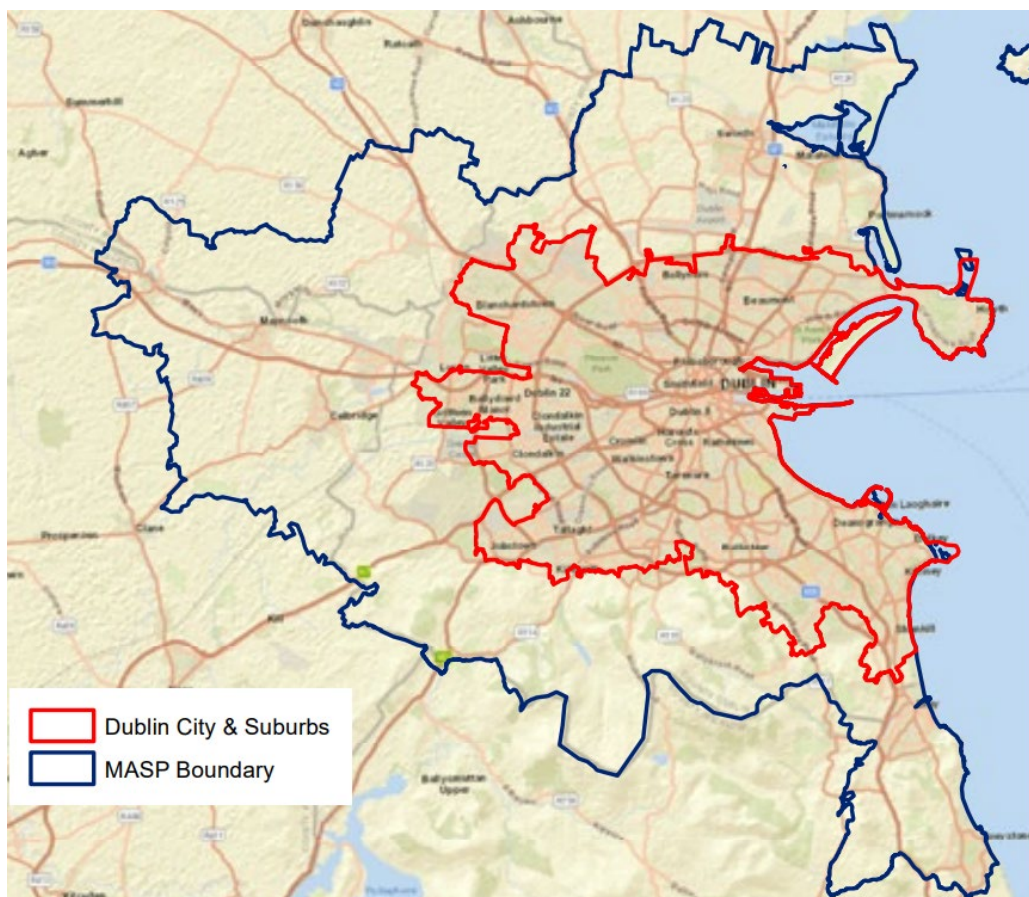
<sup>2</sup> External Link to EMRSES [https://emra.ie/dubh/wp-content/uploads/2020/05/EMRA\\_RSES\\_1.4.5web.pdf](https://emra.ie/dubh/wp-content/uploads/2020/05/EMRA_RSES_1.4.5web.pdf)

<sup>3</sup> For more information on the Dublin City & Suburbs boundary  
<https://www.cso.ie/en/census/census2016reports/census2016smallareapopulationstatistics/>

The settlement hierarchy of the RSES requires each Local Authority to identify settlements which are either: Self-Sustaining Growth Towns, Self-Sustaining Towns, Towns and Villages and/or Rural areas. Under the CSO, Newcastle, Rathcoole, Saggart and Brittas are identified settlements outside the Dublin City & Suburbs but not identified within the RSES. Their role within the overall settlement hierarchy for the County will be examined further in the process of preparing the Development Plan.

The RSES includes population figures for the Region, the parameters of which are set out under Appendix B which envisages South Dublin to grow by an additional 50,233 persons by 2031. This is discussed further below in this report.

Further to this, the Eastern Midlands Regional Assembly (EMRA) have agreed with the relevant Local Authorities transitional population figures in accordance with NPO68 of the NPF. This allows for the redistribution of regional population figures up to 2031 but only applies to the three Metropolitan key towns within the MASP (Bray, Maynooth & Swords).



**Figure 1:** Area of Dublin City & Suburbs & MASP Boundary

The RSES growth strategy for meeting the needs of the existing and future population was based on the availability of land, resources, environment and infrastructure capacity. A part of this growth strategy is to deliver sustainable growth of the Dublin Metropolitan Area (under Figure 1 above) through the Dublin Metropolitan Area Strategic Plan.

## **Dublin Metropolitan Area Strategic Plan**

Forming a part of the RSES, the Dublin Metropolitan Area Strategic Plan (MASP) sets out a 12 to 20-year strategic planning and investment framework for the Dublin Metropolitan area. The MASP is an integrated land use and transportation strategy for the Dublin Metropolitan Area that sets out:

- A vision for the future growth of the metropolitan area.
- Large scale strategic residential employment and regeneration.
- A sequence of infrastructure priorities.

All of South Dublin County Councils Administrative area is within the MASP boundary as shown under Figure 1.

As the MASP is an integrated land use and transportation strategy it provides a regional level framework which aligns population and employment growth with associated transport and infrastructure investment priorities. This is identified through strategic residential and employment areas. The Strategic Corridors and Areas of relevance for South Dublin are set out as follows:

- 1) The South West Corridor (Kildare line, DART expansion and Luas Red Line).
- 2) The City Centre within the M50 area (Multi modal).

The South West Corridor is divided between the two rail lines (Luas Red Line and Kildare line).

Along the Kildare line, the MASP identifies residential development at Adamstown SDZ and the phased development at Clonburris SDZ with a new residential community at Kilcarbery and the promotion of and development at Grange Castle Business Park for employment. Irish Rail are currently preparing a Railway Order to progress the application to upgrade capacity and electrify the Kildare line as far as Hazelhatch.

Along the Luas Red Line, the MASP identifies residential development and the regeneration of brownfield lands in Tallaght and a new district at Fortunestown near the emerging town of Saggart/Citywest with mixed /employment at Naas Road/ Ballymount and at Tallaght Town Centre/Cookstown.

At the City Centre within the M50 area, the MASP identifies the significant brownfield lands in South Dublin and Dublin City Council areas, with potential for residential development and more intensive employment/ mixed uses.

The framework for the draft core strategy below incorporates each of these strategic growth corridors / areas identified in the MASP and will be examined further during the process of preparing the Development Plan.

## **Ministerial Guidelines (Section 28 of The Act)**

The Department of Housing and Local Government (the Department) over the lifetime of different governments has produced various Ministerial Guidelines, known as Section 28 Guidelines, to inform and guide local authorities in carrying out their duties. There are a range of Section 28 Guidelines which will inform the preparation of the Draft Development Plan and draft core strategy.

Since 2018, the Planning and Development (Amendment) Act 2018 introduced a requirement for Planning Authorities to implement Specific Planning Policy Requirements (SPPRs) in the performance of their functions.

SPPRs are contained within Ministerial Guidelines from 2018 onwards. At the time of writing this report, the Department have finalised two guideline documents containing relevant SPPRs for the core strategy. The Design Standards for New Apartments – Guidelines for Planning Authorities (March 2018)<sup>4</sup> introduced SPPRs in relation to Apartment design standards which will be incorporated in the Draft Development Plan. It is the more recent Urban Development and Building Heights Guidelines for Planning Authorities, December 2018 (Urban Height Guidelines)<sup>5</sup> which have the greatest relevance for the framework for the Core Strategy.

The Urban Height Guidelines set a national planning policy guidance on building heights in relation to urban areas, as defined by the census, to strengthen the deliverability of National and Regional policy framework. The document has four SPPRs which must be complied with. Of these, there are three relating to strategic planning in the preparation of the Development Plan: SPPR 1, SPPR 2 and SPPR 4 which will be incorporated into the Draft Plan.

SPPR 1 outlines Planning Authorities must explicitly identify, through the statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development and shall not provide for blanket numerical limitation on building height.

In combination with increases in building height, Planning Authorities must ensure appropriate mixture of uses (SPPR 2), such as housing, commercial or employment development are catered for in statutory plan policy.

Finally, in planning for future development of greenfield or edge of city/town locations for housing, the Planning Authority must secure: minimum densities under the “Sustainable Residential Development in Urban Areas (2007)” guidelines or any amending or replacement

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<sup>4</sup> External web link to the Apartment Guidelines, 2018 - [https://www.housing.gov.ie/sites/default/files/publications/files/design\\_standards\\_for\\_new\\_apartments\\_-\\_guidelines\\_for\\_planning\\_authorities\\_2018.pdf](https://www.housing.gov.ie/sites/default/files/publications/files/design_standards_for_new_apartments_-_guidelines_for_planning_authorities_2018.pdf)

<sup>5</sup> External web link to the Building Height Guidelines 2018 - [https://www.housing.gov.ie/sites/default/files/publications/files/urban\\_development\\_and\\_building\\_height\\_guidelines\\_for\\_planning\\_authorities\\_december\\_2018\\_0.pdf](https://www.housing.gov.ie/sites/default/files/publications/files/urban_development_and_building_height_guidelines_for_planning_authorities_december_2018_0.pdf)

Guidelines, a greater mix of building heights and typologies and avoid mono-tone type building typologies across any one development.

All Section 28 Ministerial Guidelines published by the Department, including SPPRs, will be incorporated into the preparation of the Draft Development Plan.

## Population, Employment Growth and Land Availability

To set the National and Regional framework and demonstrate how South Dublin aligns with set population and employment targets, there are two parts which need to be examined: firstly the capacity of existing lands throughout the county, followed by the deliverability of such lands in line with NPO 72.

The Planning Authority are in the process of examining the capacity of existing zoned land (mixed-use, employment and residential) to understand the potential housing and employment yield. The second part is the preparation of the Infrastructure Assessment in line NPO 72(a)(b)(c) and Appendix 3 of the NPF. This will outline lands which are i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the Development Plan iii) land which does not fall within either the above categories.

While the Capacity Audit of existing zoned land and Infrastructure Assessment are still being finalised, the below figures set the Regional population context for South Dublin. Appendix B of the RSES, as guided by the National Planning Framework Implementation Roadmap 2018, envisages South Dublin to have a population of between 320,500 (low) and 329,000 persons (high) by 2031. For the high targets this is an increase of 50,233 persons over a 15-year period starting from 2016, or 3,348 persons a year. This information is shown below under **Table 1**.

**Table 1:** South Dublin Population Targets

	2016	2026	2031
South Dublin Population (persons)	278,767	314,000	329,000
Difference from 2016 - 2031	-	+35,233 persons	+50,233 persons
% of growth from 2016 - 2031	-	+12.63%	+18.01%

Source: High Level targets from Appendix B of the Regional Spatial Economic Strategy 2019 - 2031

Within the National Planning Framework Implementation Road Map there is flexibility to adjust the 2026 target by bringing forward population growth allocated for 2026 to 2031. The adjustment amounts to an additional 25% of the growth between 2016 - 2026 but must be within the overall population target for 2031. This adjustment means the 2026 population target is 322,808 or an additional +44,041 persons from 2016 and 329,000 by 2031. Applying an average year-on-year growth of these figures, the Development Plan population



framework is set out under Table 2. It is considered appropriate that the draft Plan cater for the NPF Implementation road map by bringing forward the population growth allocations.

**Table 2:** South Dublin adjusted Population Targets (Persons)

	2016	2022	2028
South Dublin Population (Persons)	278,767	305,192	325,285
Difference from 2016 (Number)	-	+26,425 persons	+46,518 persons
% of growth from 2016	-	+9.47%	+16.68%

The Planning Authority notes that figures for housing unit targets, based on population, for each Local Authority are due to be published by the Department but are not available to date.

In respect of employment, there is no specific figure for South Dublin at the time of writing this report. In terms of a framework, the NPF envisages the Eastern Midlands Region, within which South Dublin is located, to grow by 320,000 additional jobs over a 24-year period bringing employment in the region to 1.34 million by 2040. This context sets the parameters for the draft core strategy. A key part of employment will be retail provision for the County which must be consistent with the retail hierarchy for the Region under the RSES (Table 6.1 of the RSES) and prevailing Retail Planning Guidelines (RPO 6.11). The Planning Authority have appointed an Economic Consultant to examine the economic development of South Dublin in the context of the NPF with a view to developing appropriate policy to continue to promote and facilitate additional jobs in the county as part of the overall employment for the Region.

**Table 2:** Regional Employment Context

	2016	2040
Eastern Midland Region Employment	1,020,000	1,340,000
Difference from 2016 - 2040	-	+320,000 jobs
% of growth from 2016 - 2040	-	+31%

Source: National Planning Framework 2040

It is important to note that the above figures are across three census periods (2022, 2026 and 2031). Population and employment figures and overall National / Regional Strategy will be reviewed after each census period to evaluate the spatial growth of population for the State and Region. For the time being, **Table 1** and **Table 2**, in conjunction with further analysis, will

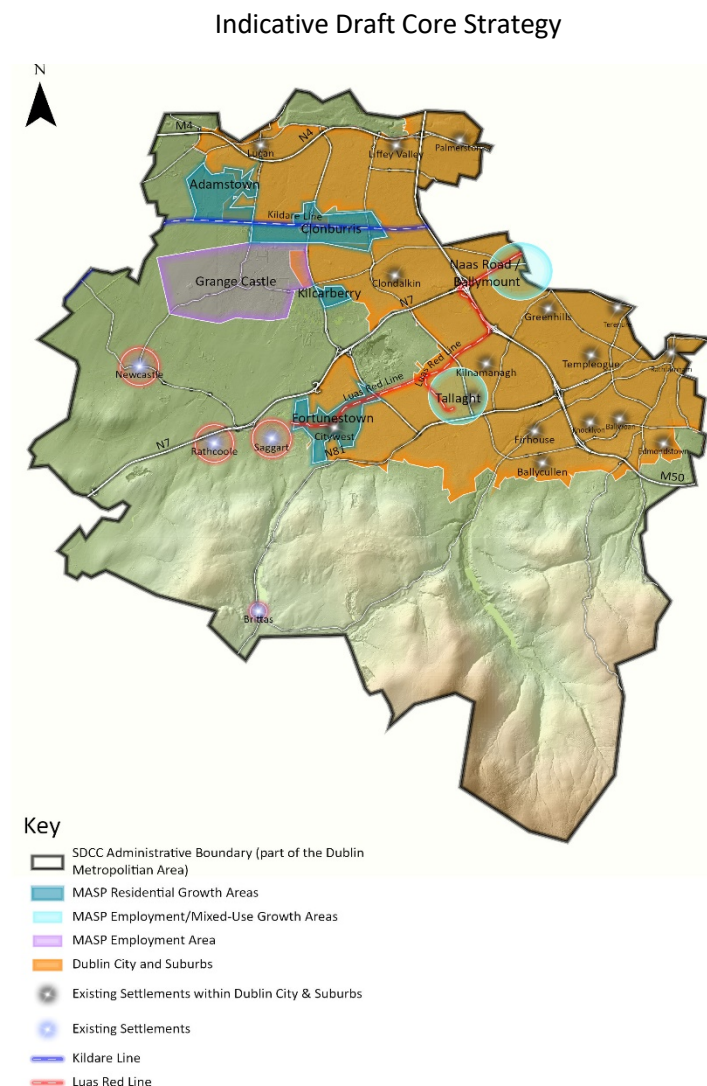


inform the pro-rata rate of population & employment growth for South Dublin between 2022 and 2028.

## 2.3 Framework for the Draft Core Strategy

The framework for the draft core strategy is based on the key principles and objectives of the NPF, RSES including the MASP and SPPIs of the Ministerial Guidelines. It applies a compact growth philosophy to the existing urban footprint of the Dublin City & Suburbs settlement in the County with particular focus on regionally identified residential and mixed-use communities along existing and proposed strategic transport corridors with the ability to deliver a reduced carbon footprint.

The map below illustrates the framework for forming the spatial growth of the County in order to prepare the draft core strategy based on the preceding sections. It is important to note that the map below sets an indicative framework to inform the preparation of the draft core strategy, during the Development Plan process.





## Part 3 – CE Strategic Recommendations for Policies in the Draft Development Plan

### Chief Executive’s Recommendations on Strategic Direction for Policy in the draft South Dublin County Development Plan 2022-2028

The following are the Chief Executive’s recommendations for the strategic policy direction that the draft Plan should encompass. These directions are taken from the recommendations included under each heading in Section 4 of this report. Those recommendations that are considered overarching for the draft Plan have been outlined separately below. In some instances, where the meaning remains the same recommendations have been amalgamated.

Strategic Issues	Policy Recommendations for the Strategic Direction of the Draft Plan
<b>Overarching Strategic Direction</b>	<ul style="list-style-type: none"><li>• Prepare a strategic vision for the Draft Plan which aligns, as appropriate, with the Objectives of the NPF and RSES having regard to their alignment with the United Nations Sustainable Development Goals</li><li>• Promote quality of life for all generations through the creation of healthy and attractive places to live, work, visit, invest and study in, as an overarching consideration in the preparation of the Draft Plan.</li><li>• Include climate action as an overarching and cross-cutting theme across the Draft Plan in line with policies and objectives contained in the NPF, the RSES, South Dublin’s Climate Change Action Plan 2019-2024 and national legislation.</li><li>• Support a broad-based economy within the County, catering for different skill levels and increasing economic resilience</li><li>• Support an efficient and effective transport system, promoting modal shift to public transport, walking and cycling, encouraging permeability and taking account of national and regional policy and guidance.</li><li>• Support and promote social inclusion having regard to the Council’s Corporate Plan and in line with national and regional policy</li></ul>

	<ul style="list-style-type: none"> <li>• Ensure that the preparation of the Draft Development Plan is fully informed by the environmental assessments carried out under the SEA, AA and SFRA processes in compliance with environmental legislative requirements</li> <li>• Ensure that the policies in the draft Development Plan have regard to section 28 planning guidelines and are consistent with the relevant SPPR's and national and regional objectives.</li> </ul>
<b>Population Growth and Housing</b>	<ul style="list-style-type: none"> <li>• Prepare an evidence-based Core Strategy, Housing Strategy and Settlement Strategy in line with the requirements of the Planning and Development Act 2000 (as amended) and consistent with the objectives of the NPF, RSES and the MASP.</li> <li>• Ensure the draft Plan is informed by a planning and infrastructural assessment in line with the provisions of Appendix 3 of the NPF and promote the phasing of new development alongside the delivery of required infrastructure to create sustainable communities.</li> <li>• Promote compact growth in line with the NPF and RSES through the inclusion of specific policies and targeted and measurable implementation measures that: <ul style="list-style-type: none"> <li>○ encourage infill / brownfield development and</li> <li>○ focus growth on the County's designated strategic development areas.</li> </ul> </li> <li>• Facilitate a co-ordinated approach to the future development of the Naas Road area with Dublin City Council and relevant stakeholders</li> </ul>
<b>Built Environment and Placemaking</b>	<ul style="list-style-type: none"> <li>• Promote a high standard of building and urban design, creating public spaces that are distinctive, safe and accessible and facilitate social and cultural diversity and interaction.</li> <li>• Promote compact growth, the prioritisation of active travel and the promotion of increased densities along public transport corridors in line with the NPF and RSES.</li> <li>• Ensure that section 28 planning guidelines and associated special planning policy recommendations inform the policies and objectives of the Draft Plan.</li> </ul>

	<ul style="list-style-type: none"> <li>• Promote a high standard in the delivery and on-going maintenance of infrastructure and utilities to enhance the built environment</li> <li>• Review the policies, standards and provisions on signage and strengthen where appropriate in the Draft Plan having regard to the signage strategy agreed by the Council in 2020.</li> <li>• Ensure that the Housing Strategy recognises the diverse needs of all of South Dublin's citizens meeting, insofar as is feasible, their diverse accommodation needs</li> <li>• Provide for the protection, preservation and promotion of the built heritage, including architectural heritage and archaeological heritage</li> <li>• Examine measures to encourage the retention and re-use of historic structures within the County</li> <li>• Recognise the value of cultural heritage to the County and support the implementation of the South Dublin Heritage Plan</li> </ul>
<b>Climate Action and Energy</b>	<ul style="list-style-type: none"> <li>• Support compact growth as a means of delivering on climate action through efficient use of public transport, active travel and achieving greater energy efficiencies.</li> <li>• Ensure the built environment is climate change ready by supporting climate change mitigation and adaptation measures into new and existing development</li> <li>• Encourage the decarbonisation of the transport, built environment and energy sectors and facilitate the transition to a low carbon economy and society in line with government policy and legislation.</li> <li>• Seek to set targets and indicators based on the policies and objectives within the draft Plan to monitor the achievement or otherwise of a reduction in the county's carbon footprint.</li> <li>• Ensure that surface water management and flood risk measures are considered as part of climate mitigation and adaptation</li> </ul>

<p><b>Sustainable Movement</b></p>	<ul style="list-style-type: none"> <li>• Direct compact growth around existing and planned services ensuring that transport and land use are integrated to the greatest extent possible so that the demand for travel in general and for car-based travel is reduced.</li> <li>• Include sustainable transport indicators, including targets for mode share, to monitor the policies and objectives of the draft Plan over its lifetime.</li> <li>• Work with TII and other national agencies, to protect and enhance the capacity of national routes, such as the N4, N7, N81 and M50 to minimise the impacts on the management of the broader network</li> </ul> <p><b>Walking and Cycling</b></p> <ul style="list-style-type: none"> <li>• Promote and enable the delivery of infrastructure to increase the number of people walking and cycling.</li> <li>• Work with surrounding local authorities to plan for and support delivery of public transport and active travel modes.</li> <li>• Support the delivery of a sustainable movement study and the Cycle South Dublin Strategy to promote permeable and compact communities with access to amenities, businesses, employment and retail areas and to improve mobility.</li> <li>• Support the delivery of a comprehensive network for safe cycling over the lifetime of the new plan including the delivery of new projects and the upgrade of the existing network and identify specific projects for delivery where possible.</li> <li>• Support delivery of infrastructure associated with cycling to enable and encourage a greater take up and comfort of cycling in the County.</li> <li>• Measure and promote the carbon reducing benefits of the increased cycle network and other modal shifts.</li> <li>• Incorporate requirements for Active Travel Plans and Traffic Management Plans where appropriate through the Development Management System</li> </ul>
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	<p><b>Public Transport: General</b></p> <ul style="list-style-type: none"> <li>• Support the delivery and improvement of public transport infrastructure and services across the County including BusConnects, rail and LUAS in terms of connections, capacity, and efficiency of services in line with national and regional policy.</li> <li>• Support new and improved public transport orbital routes; routes across the County; and connections into surrounding counties in line with the GDA Transport Strategy and national and regional policy.</li> <li>• Facilitate rural transport services that provide for social and economic connectivity between small villages/rural areas and larger towns within the County and support the delivery and enhancement of the NTA's Local Link Rural Transport Programme.</li> </ul> <p><b>Heavy and Light Rail</b></p> <ul style="list-style-type: none"> <li>• Support the use and improvement of the heavy and light rail networks within the County, in collaboration with the relevant transport providers, to provide a much-improved public transport offering and to support the principle of compact growth and integrated transport and land use planning alongside this.</li> </ul> <p><b>Electrical and Gas Networks Vehicles</b></p> <ul style="list-style-type: none"> <li>• Support the forthcoming 'Dublin Regional EV Charging Strategy' and support the delivery of electrical car charging infrastructure</li> <li>• Review Development Management policies in relation to the delivery of sustainable transport infrastructure in particular EV charging to support the use of cleaner fuel.</li> </ul> <p><b>Car Parking</b></p> <ul style="list-style-type: none"> <li>• Investigate measures which adequately meet the carparking requirements for residential and non-residential development in line with national planning and transport policy requirements.</li> <li>• Review and update policy in relation to wider carparking issues including shared car parking bays for electric vehicle parking, carpooling and other sustainable forms of transportation.</li> </ul>
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	<p><b>Roads</b></p> <ul style="list-style-type: none"> <li>• Seek to implement the provision of the Design Manual for Urban Roads and Streets (as updated) in relation to the delivery of safe streets and overall best practice design and promote the principle of filtered permeability.</li> <li>• Support measures that will help to manage road traffic across the County</li> <li>• Ensure that transport policies align with the objectives of Project Ireland 2040: National Planning Framework and National Development Plan, 2018 - 2027, Smarter Travel (DTTAS, 2009), (SFILT) Investing in our Transport Future (DTTAS, 2015), the provisions of the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012), and the Eastern and Midland Regional Assembly Regional Spatial and Economic Strategy (EMRA RSES)</li> <li>• Investigate the need for road infrastructure where it is required to support the delivery of compact growth</li> </ul> <p><b>Airports</b></p> <ul style="list-style-type: none"> <li>• Review and support the safety requirements of each of the airports/aerodromes located within the County and ensure that a balanced approach is taken to aircraft noise management in line with the recommendations of the International Civil Aviation Organization (ICAO).</li> </ul>
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<p><b>Community Services</b></p>	<ul style="list-style-type: none"> <li>• Support policies and objectives that protect and enhance existing community resources and support the development and expansion of new facilities and services in proximity to the populations they serve where their need is identified, and resources allow.</li> <li>• Consider the inclusion of new infrastructure projects, including parks and open spaces, in the Development Plan and their inclusion into any revised development contribution scheme subject to the necessary statutory processes</li> <li>• Prepare a social infrastructure audit which will inform policy on infrastructure provision within the County</li> <li>• Continue to work in collaboration with the Department of Education on all matters relating to the identification of suitable sites and the Department's delivery of new and extended schools and supporting facilities within the County.</li> <li>• Informed by the Green Infrastructure and Parks and Open Space Strategies, recognise the diverse and key roles that parks and open spaces have for sustainable communities and healthy placemaking.</li> </ul>
<p><b>Economic Development and Employment</b></p>	<ul style="list-style-type: none"> <li>• Support economic growth within the County, having regard to the National Planning Framework and the Regional Spatial and Economic Strategy and recognise the strategic importance of established urban centres.</li> <li>• Support the delivery of infrastructure that will attract both sustainable FDI investment and indigenous enterprise at appropriate locations throughout the county, in particular where it reduces the need for commuting.</li> <li>• Ensure flexibility to facilitate existing and future trends in economic development and employment, including identification of appropriate zoning objectives and being supportive of different ways of working whether from home or otherwise.</li> <li>• Review the existing retail hierarchy within the county having regard to the Greater Dublin Area Retail Strategy, or any superseding strategy, and explore the opportunity to strengthen the retail function in the county</li> <li>• Promote and facilitate the sustainable growth of South Dublin's tourism offer in both urban and rural areas, including by improving active travel opportunities for people to access these destinations</li> </ul>

	<ul style="list-style-type: none"> <li>● Review and update existing policies and objectives to support the protection and promotion of public rights of way in the county.</li> </ul>
<b>Natural Heritage and Biodiversity</b>	<ul style="list-style-type: none"> <li>● Ensure that the updated South Dublin Landscape Character Assessment inform policies and objectives in the draft Plan.</li> <li>● Prepare a Green Infrastructure Strategy as an integral part of the draft Plan preparation, to ensure that the ecological, economic, and social benefits to the County can be integrated into relevant policy and objectives through natural solutions</li> <li>● Continue to reflect the objectives of the Liffey Valley Special Amenity Area Order through relevant zoning and other objectives within the Plan seeking to increase access where appropriate and feasible</li> <li>● Develop policies and objectives within the Draft Plan that reflect the objectives of the National Biodiversity Action Plan 2017-2021, or subsequent plans</li> <li>● Provide for measures and indicators to monitor the environmental impact of the Development Plan</li> <li>● Include a list of existing Tree Preservation Orders in the Development Plan</li> <li>● Ensure that the Development Plan provides for appropriate protection of trees and hedgerows, where possible, recognising their value to our natural heritage, biodiversity and climate action and encourage tree planting in appropriate locations.</li> <li>● Provide for relevant projects to be subject to environmental impact assessment as required by Directive 85/337/EEC (EIA) as amended and codified and, where necessary and appropriate seek ecological impact assessment for sub-threshold developments</li> </ul>
<b>Infrastructure and Utilities</b>	<ul style="list-style-type: none"> <li>● Liaise with national infrastructure providers to co-ordinate, inform and influence the timely provision of infrastructure for the sustainable development of the County.</li> <li>● Facilitate and promote the development of energy networks and ICT infrastructure where necessary to facilitate sustainable growth and economic development, subject to proper planning and sustainable development.</li> </ul>

	<ul style="list-style-type: none"> <li>• Ensure the objectives of the East Midlands Region Waste Management Plan 2015-2021, or such plans as may be updated, are incorporated where relevant into the Development Plan</li> <li>• Support the principle of the Circular economy, facilitate the provision of additional bring banks and recycling centres to meet the growing population where a need is identified, and resources allow</li> <li>• Ensure new development, in particular higher density residential development, provides adequate space for waste management and recycling.</li> <li>• Engage with Irish Water to facilitate projects that deliver the water services infrastructure necessary to support South Dublin's settlement strategy, sustainable growth and mitigation and adaptation to climate change in line with national and regional policy.</li> <li>• Facilitate the achievement of 'good status' in all waterbodies in compliance with the Water Framework Directive and associated river basin management plans in the county.</li> <li>• Ensure a sequential and precautionary approach to flood risk management in line with the requirements of the Guidelines on the Planning System and Flood Risk Management (DHPLG/OPW, Nov 2009)</li> <li>• Ensure that measures to protect groundwater and drinking water sources are incorporated into the Development Plan</li> <li>• Ensure that sustainable urban drainage (SUDs) measures are incorporated into the draft Plan to reduce the level of surface water run-off, improve water quality and contribute to adaptation to climate change through natural solutions</li> <li>• Promote and support the pro-active management of noise including the South Dublin County Council's Noise Action Plan 2018-2023 which is due for review during the lifetime of the Plan.</li> </ul>
<b>Neighbourhood Areas</b>	The issues at neighbourhood area level have all been considered and form part of the recommendations above.



## **Part 4 Chief Executives Summary of Submissions, Opinion and Recommendations**

### **4.1 Chief Executives Summary, Opinion and Recommendations on submissions from Eastern and Midlands Regional Assembly, The National Transport Authority, and the Office of the Planning Regulator.**

#### **4.1.1 Eastern and Midland Regional Assembly Chief Executives Summary**

The submission provides a general background to the purpose of the Regional Spatial and Economic Strategy (RSES) and the requirement for the County Development Plan to be consistent with the RSES and the National Planning Framework (NPF) thus ensuring alignment between local, regional and national policy. The submission draws attention to key areas and Regional Policy Objectives (RPOs) of the RSES, and the National Strategic Objectives (NSOs) of the NPF which should inform the County Development Plan.

The submission sets out that the Planning Authority must ensure that the County Development Plan (CDP) 2022-2028 is consistent in its entirety with the RSES. The following are key areas that the Regional Assembly wish to draw attention to in the drafting of the Core Strategy of the CDP:

**Vision:** In determining the overall vision of the new South Dublin CDP, it is recommended that the Council consider the Vision, Key Principles and Regional Strategic Outcomes (RSOs) of the RSES Chapter 2. It is further stated that the RSO's are aligned to the National Strategic Outcomes (NSOs) of the NPF and the ability to demonstrate delivery of these may potentially be linked to future funding sources.

**Growth Strategy:** The submission draws the attention of the Council to the Growth Enablers for the Eastern and Midland Region, along with the Growth Enablers for Dublin City and Metropolitan Area and for the Dublin – Belfast Economic Corridor.

**Sustainable Compact Growth:** The submission draws the attention of the Council to RPO 3.2 which requires local authorities, in their Core Strategies to set out measures to achieve compact urban development targets of at least 50% of all new homes within or contiguous to the built up area of Dublin City and Suburbs and a target of at least 30% for other urban areas, in line with Project Ireland 2040 - the National Planning Framework (NPF).

The submission further sets out that RPO 3.3 also determines that regeneration lands are identified in Core Strategies and that specific objectives are set out to develop these lands.

It is anticipated that further guidance on the delivery and monitoring of compact growth will be addressed in upcoming draft Departmental Guidelines for Development Plans.

**Settlement Strategy:** The submission requests that the settlement strategy set out in the Draft Plan align with the RSES and Regional Policy Objective (RPO) 4.3 which relates to the settlement hierarchy. Consideration should be given to the definition of settlements located outside the city and suburbs boundary, as lower tier settlements and distinct from those areas that are located within or contiguous to the existing built up area of 'Dublin city and suburbs'.

In regard to Issues paper 'Neighbourhood Area's' the assembly acknowledges the identified clusters of settlements within the identified neighbourhood areas provide a rational basis for spatial consultation around strategic issues and opportunities, a key issue in the preparation of the Core Strategy will be to ensure consistency with the settlement hierarchy and settlement typologies set out in Table 4.2 and Table 4.3 of the RSES.

The submission recommends that consideration be given to the phasing and prioritisation of development lands, and that all future land subject to zoning shall undergo an infrastructure and deliverability assessment in line with NPF NPOs 72 (a), (b) and (c), which sets out a tiered approach for zoning lands. Also, of relevance are RSES RPO 4.2 to promote collaboration with infrastructure providers to ensure alignment of enabling infrastructure investment.

**Dublin Metropolitan Area Strategic Plan (MASP):** The submission makes reference to the regeneration of strategic lands at Naas Road/Ballymount in the City Centre within the M50, the consolidation and regeneration of the county town of Tallaght and delivery of the strategic residential and economic development areas on the South-West Corridor, supported by the LUAS and Kildare lines, as set out in Table 5.1.

The plan should ensure a phasing and prioritisation of enabling infrastructure is applied to ensure a steady supply of strategic development lands in the Dublin Metropolitan Area. The core strategy of the CDP should have a focus on the delivery of sites in the MASP whilst retaining flexibility to provide for ongoing opportunities for increased densities, reduced vacancy and re-use of underutilised lands within the Metropolitan area in line with the transitional population projections methodology in the NPF.

**National and Regional Population Targets:** The submission states that population targets should be applied as set out in the NPF Implementation Roadmap and NPO 68 of the NPF.

**The submission further sets out a number of points under the eight Strategic Issues and the Neighbourhood Areas as follows:**

**Built Environment and Placemaking:** The Council's attention is brought to RPO 9.1, which supports the provision of a mix of housing typologies to meet diverse future needs and to RPO 9.3, which supports a greater mix of housing type and tenure, including social and affordable.

RPOs 5.4 and 5.5 support the provision of higher residential densities, achieving qualitative standards and the right housing and tenure mix in the metropolitan area, in line with national guidelines on 'Sustainable Residential Development in Urban Areas', 'Sustainable Urban Housing; Design Standards for New Apartments' and 'Urban Development and Building Heights Guidelines for Planning Authorities'.

**Climate Action and Energy:** The focus in the Issues papers on Climate and Energy is welcomed, in keeping with the RSES Key Principle on Climate Action, supported by RSOs 6-11.

The submission sets out that information contained at Chapters 4, 7, 8 and 10 of the RSES will also assist the Local Authority in developing an integrated climate policy, in particular Section 7.9 Climate Change and the related RPOs address the need for decarbonisation of the transport, built environment and energy sectors.

The Council is also directed to Section 10.3 'Energy' and the Guiding Principles to support the roll out of smart grids and future energy networks enabling the promotion of renewable energy sources, in line with RPO 10.19

The future CDP will also be required to include measures to assess and monitor progress on carbon reduction targets, in line with RPO 3.6 of the RSES. To this end, it should be noted that EMRA is leading an ESPON EU research programme (QGasSP) to identify a robust method for quantifying the relative GHG impacts of alternative spatial planning policies, the outputs of which may inform the upcoming review of the development plan.

**Population Growth and Housing:** The Assembly welcome the stated alignment that is required between policies of the NPF and the RSES with the Core Strategy of the CDP and the inclusion in the Issues Paper of population targets that align with the high range of RSES population projections to 2031.

The Assembly recommend that further phased breakdown of population targets should be applied in accordance with the MASP Transitional Population Projections, as adjusted to comply with NPO 68 of the NPF and with the methodology for transitional projections in the NPF Implementation Roadmap.

In drafting the Core Strategy the Council is required to set out an evidence based rationale for the provision of adequate zoned land and a tiered approach to zoning to meet the NPF/RSES population targets over the lifetime of the plan, and to accommodate future development beyond the plan.

The Assembly welcomes the recognition of the issues paper to the designated growth centres within the County and it is anticipated that the review of the Draft plan will allow for consideration of targeted zoning objectives and active land management measures to drive the regeneration of designated lands at Tallaght and the Naas Road.

The Assembly welcomes the steps identified in the Issues paper on the adequate delivery of housing and the need to examine housing delivery and to prepare a land availability,

capacity and infrastructural study in order to inform the Core Strategy, Housing Strategy and zoning objectives.

It is recommended that the review of the CDP be informed by an evidence based Housing Needs Demand Assessment which will allow for the consideration of housing targets, types and tenures alongside the monitoring of housing delivery and supply in line with NPO37 of the NPF.

The assembly drawing the Council's attention to policies 9.3 of the RSES including RPO 9.5 in that EMRA will support local authorities in preparing a HNDA and it is considered that a sub-regional HNDA is appropriate for the four Dublin Local Authorities.

**Sustainable Movement:** The Regional Assembly welcomes the Council's commitment to integrated transport and land use and to sustainable mobility.

The Assembly refers to RPO 8.1, which requires that the integration of transport and land use planning shall be consistent with the Guiding Principles set out in Section 8.3 of the RSES. Further reference is made to RPO's 8.16 and 8.4 which require that land use plans within the GDA demonstrate consistency with the NTA's Transport Strategy for the Greater Dublin Area.

The Assembly recommends early engagement with the transport agencies to ensure the integration of transport and land use in the South Dublin CDP and in the preparation of Local Transport Plans for selected settlements in the Region (RPO 8.6) to help achieve a mode shift.

**Community Services:** The assembly welcomes the recognition of the need to promote social inclusion and create sustainable communities in line with the principle of Healthy Placemaking which underpins the RSES. The submission makes further reference to RPO's for healthy placemaking set out in section 9.4 of the RSES with particularly reference to RPO's 9.2, 9.14 and 9.17.

The Assembly notes that the South Dublin LECP will require review in light of the adoption of the RSES, also noting the statutory role of the Regional Assemblies in the LECP process in ensuring consistency between the LECP, the development plan and the RSES. Also, welcomed is the stated intention to carry out social infrastructure assessments where required to inform the planning of future sustainable communities.

**Economic Development and Employment:** The Assembly welcomes the inclusion of a section on Economic Development and Employment as part of the Issues Paper. Ensuring economic opportunity for all is one of the three key principles of the RSES, which sets out for the first time in Irish planning an economic strategy that is intrinsic to a regional spatial plan.

The submission refers to chapter 6 of the RSES and the identification of locations for strategic employment development being consistent with the growth and Settlement Strategy of the County Development Plan. It is further outlined that the new CDP should



also be informed by Section 8.3 - Integration of Transport and Landuse in the RSES, which set out guiding principles (Section 6.3) for the location of trip intensive developments such as large-scale retailing and strategic employment zones.

The submission recommends that the level of retail provision in the County be consistent with the retail hierarchy for the region as set out in Table 6.1 of the RSES. The Assembly also recognise the need for a new retail strategy for the region.

The submission makes further reference to town centre renewal and RPOs 6.12-6.14 which support placemaking and the revitalisation of urban centres.

**Natural Heritage and Biodiversity:** The Assembly welcomes the recognition given in the Issues Paper to the role of Green Infrastructure (GI) and Ecosystem Services in supporting biodiversity and enhanced quality of life. The planning authority is directed in this regard to the Guiding Principles for Green Infrastructure (Section 7.7 refers) and for Sustainable Urban Drainage (SuDs) (Section 10.2 refers) set out respectively in chapter 7 - Environment & Climate and Chapter 10 Infrastructure, which should be incorporated into the future CDP.

The Assembly welcomes the intention that a Landscape Character Assessment will accompany the new CDP.

The submission sets out that the plan in tandem with the required environmental processes, namely Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) offers an opportunity for additional assessment of greenhouse gas emissions subject to the availability of an agreed methodology at national level.

**Infrastructure and Utilities:** The Regional Assembly welcomes the Council's commitment to the provision of high-quality infrastructure and utilities in a plan led manner to ensure that there is adequate capacity to support future development.

The Assembly recommends early engagement with the relevant agencies, including Irish Water (IW), to ensure that water and air quality, noise and waste management accord with relevant EU and national legislation.

The submission draws the Council's attention to Sections 8.6 of the RSES which deals with communications and digital infrastructure (RPOs 8.25 and 8.26 refer) and to Section 10.3, which deals with future energy networks including the roll out of Smart Grids and Smart Cities and reinforcement of the Greater Dublin Area's transmission network (RPOs 10.19 to 10.24 refer) as part of Eirgrid's Development Strategy.

**Flood Risk:** It is recommended that the Council take into account the need to identify flood risks and ensure the resilience of critical infrastructure, as set out in RPO 7.43 of the RSES. The planning authority shall also note the provisions of the National Mitigation Plan 2017 and the National Adaptation Framework 2018 in this regard.

## **Conclusion**

The Regional Assembly welcomes the publication of the Issues Booklet which marks the beginning of the alignment of planning policy at county and local levels with Regional and National Policy. The Assembly look forward to corresponding with the Council on the forthcoming stages of the County Development Plan process. It is noted that the officials of the Regional Assembly are available to discuss the matters raised above and will be available throughout the County Development Plan process.

## **Chief Executive's Opinion**

The contents of the submission from the regional assembly is noted and welcomed.

The Council acknowledges the requirements of Section 10(1)(A) and 10 (2)(A) of the Planning and Development Act 2000 (as amended) in regard to the contents of the Core Strategy and the requirements for the Development Plan to be consistent with the NPF, RSES and the MASP.

The Council acknowledges the importance of both the NPF's National Strategic Outcomes (NSOs) and the RSES's Regional Strategic Outcomes. The vision for the next South Dublin County Development Plan will take account of the Vision, Key Principles and RSOs of the RSES as set out in Chapter 2.

It is further acknowledged that both the NSO's and RSO's are broadly aligned with the United Nations Sustainable Development Goals the provisions of which will further inform the vision for the new plan in the areas of climate action and energy, economic development, education, health, equality and the overall creation of an inclusive, safe, resilient and sustainable County.

The council recognise the provisions set out in section 3.2 of the RSES on Growth Enablers for the region and the contents of the MASP as set out in Chapter 5. The requirements of RPO 3.2 and the principles of sustainable compact growth are also recognised. The framework for the Draft Core Strategy as set out in part 2 of this report demonstrates that the draft development plan will be consistent with both National and Regional Policy in regard to the achievement of Compact Growth within the County.

In line with the provisions of RPO 3.3 and the requirements of section 10(2)(h) of the planning and Development Act (as amended) the Draft Plan will include specific policies and implementation measures that will encourage infill / brownfield development in the County's designated strategic development areas that are specific, targeted, and measurable.

The settlement strategy of the Draft Plan will be prepared having due regard to the strategy and hierarchy set out in the RSES. Figures 4.2 and 5.1 of the RSES provide a schematic of the Settlement Strategy which identifies Dublin City and Suburbs as defined by the CSO. The

Draft Plan will consider appropriate designations for settlements which are located outside and not contiguous to the defined city and suburbs boundary.

As part of the plan review process a Planning and Infrastructural Assessment (in line with the provisions of Appendix 3 of the NPF) is being carried out which will identify enabling infrastructural needs throughout the County and facilitate a phased approach to development.

The provisions of the MASP and opportunities for the growth of the County along existing sustainable transport corridors is acknowledged. The framework for the Draft Core Strategy as set out in Part 2 of this report demonstrates that the Draft development plan will place a focus on the delivery of sites within the MASP while also providing for increased densities, reduced vacancy and the re-use of underutilised lands located within the Metropolitan Area.

The Council acknowledges that the final adjustments to the NPF and the RSES Population forecasts at County level are still to be determined in accordance with the requirements of NPO68 of the NPF. Once finalised and where practicable within any timeframes the Core Strategy of the Draft Plan will be informed by the agreed population forecasts.

The provisions of RPOs 9.1 and RPO9.3 are noted and acknowledged. The need for responsive planning policy that is age and family friendly is recognised by the Council. Such measures will form a key cross cutting theme throughout the Draft Plan and will include measures for the delivery of compact growth including a mix of housing types and tenures, new and enhanced public spaces, the protection of built and natural heritage alongside a connected sustainable transport network.

With specific reference to housing need, and in the absence of the proposed national guidance or toolkit, it is intended to carry out a Housing Strategy (Needs Assessment) as part of the review process which will be underpinned by a robust baseline in regard to housing needs within the County capable of informing and guiding policies and objectives in the Draft Plan. It is intended that such provisions will include the integration of flexible housing typologies and tenure.

As part of the review process of the plan it is also intended to prepare a Building Height and Density Guide which shall have regard to the 'Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities' (2018) and the 4 SPPR's contained within in order to inform policy provision within the plan and guide future development.

The area of Climate Action will form a key cross cutting theme throughout all sections of the Draft Plan and will be implemented having regard to the Climate Action Regional Strategic Outcomes 6-11 and the provisions of chapters 4, 7, 8 and 10 of the RSES.

The Council are aware of their requirements under section 31AM(2)(a) to address, in particular, matters within the scope of section 10(2)(n) of the Act, the transition to a low carbon economy. The overall reduction in carbon emissions will form a central planning policy consideration in the preparation of the plan. The Draft plan will seek to build upon

existing renewable energy initiatives, such as the Tallaght District Heating Project throughout the County where feasible and viable.

With regard to RSO 9 and the transition to a low carbon economy by 2050 the work currently being carried out by the assembly is noted. The Council will endeavour to implement the provisions of any forthcoming guidance on the matter should it be feasible within the statutory timeframe associated with the making of the County Development Plan.

The promotion of alternatives to the private car in accordance with section 10(2)(n) of the Act alongside the provisions of RPO's 8.1 and 8.4 of the RSES will form a key theme within the Transport section of the Draft County Development Plan. Research and analysis are currently ongoing in conjunction with the NTA to identify infrastructural and other measures which will contribute towards a modal shift away from the private car. A key aspect of this work will be the development of modal shift targets over the short, medium, and longer term which will contribute towards the transition to a climate resilient low carbon County.

A key component to achieving compact growth within the County will be ensuring existing urban centres can meet the needs of the local community they serve. The Draft Plan will aim to promote a high standard of building and urban design within centres, creating public spaces that are distinctive, safe and accessible and which promote and facilitate social interaction.

The promotion of Healthy Placemaking and the provisions set out under RPO's 9.2, 9.14 and 9.17 are noted. The preparation of Social Infrastructure Assessments is ongoing as part of the plan review process which will assist in identifying existing and future community, cultural and recreational needs and inform policy provision within the plan.

The provisions set out in RPOs 6.12-6.14 will be used alongside RPO's 9.2, 9.14 and 9.17 in the development of policies and objectives capable of facilitating town centre renewal and healthy placemaking within the County.

It should be further noted that the Council is committed to improving accessibility and inclusivity for all in society, regardless of age, means or abilities, with the South Dublin LECP fulfilling the role of driving Council activities and actions in this regard. A wide range of actors and agencies will be required to deliver the LECP goals. It will be the role of the LCDC to coordinate the various organisations and actions required to fulfil the goals of the LECP. The Draft Plan will be crafted in a manner which facilitates the delivery of and improves access to such community facilities while also facilitating measures that enhance the amenity and physical attributes of communities.

The Council acknowledges the guiding principles set out for locating strategic employment, investment prioritisation in placemaking and the integration of land use and transport as set out in sections 6.3 and 8.3 of the RSES. As part of the review process of the plan an Economic Analysis is currently being carried out which will identify opportunities and inform the quantum/location and types of employment to be located within the County in line with the RSES guiding principles and the provisions set out for

the identified strategic employment corridors set out in the MASP.

The South Dublin County Retail Hierarchy is set out in Chapter 5, Table 5.1 of the current development plan and has been derived from the Retail Strategy for the Greater Dublin Area (2008-2016) and updated to take account of the existing scale and function of centres within the County. This table is consistent with the provisions of RPO 6.11 and table 6.1. The Draft Plan will carry forward such provisions for retailing within the County to facilitate and guide future growth of the retail sector within the County.

The Council notes the Assembly's reference to the guiding principles for Green Infrastructure and Sustainable Urban Drainage set out in Chapters 7 and 10 of the RSES. A green infrastructure strategy is currently being developed for the County which will identify opportunities to develop the green network within the County not only from a habitat, biodiversity and ecological perspective but also as a mean of addressing climate change adaptation and mitigation.

A review of the Landscape Character Assessment for the County is currently being prepared and will inform the policies and objectives of the Draft Plan.

The Council have actively engaged with the relevant infrastructural agencies through the early stages of the plan making process and will continue to do so through each of the plan making stages.

The Draft plan will be accompanied by a Strategic Flood Risk Assessment.

RPO 7.43 specifically relates to the identification of critical infrastructure within the County and ensuring it is capable of withstanding, adapting and recovering from adverse events is paramount. Critical infrastructure includes transport Infrastructure, electricity and gas networks, flood risk management, and water services infrastructure. South Dublin has a key role in the management of major emergencies within the County in line with the provisions of the Major Emergency Plan 2016 which includes risk assessments of the County area. It should be further noted that some critical infrastructure within the County is under the remit of other bodies such as Irish Water, Irish Rail, Bord Gais and the Electricity Supply Board (ESB) and Eirgrid.

The above provisions of the RSES relating to the delivery of communications and digital infrastructure, the development of future energy networks and reinforcement of the Greater Dublin Areas transmission network are noted. The Draft Plan will aim to facilitate the delivery of such measures through appropriate policy provision.

## **Chief Executive's Recommendations**

It is recommended that the Draft Plan policies and objectives address the issues outlined in the EMRA submission in the following ways:

- Prepare a Core Strategy, Housing Strategy and Settlement Strategy in line with the requirements of the Planning and Development Act 2000 (as amended) and consistent with the objectives of the NPF, RSES and the MASP.
- Prepare a strategic vision for the Draft Plan which aligns with the Objectives of the NPF and RSES.
- Include specific policies and implementation measures that encourage infill / brownfield development in the County’s designated strategic development areas that are specific, targeted, and measurable.
- Prepare a Planning and Infrastructural Assessment in line with the provisions of Appendix 3 of the NPF which will identify enabling infrastructural needs throughout the County and facilitate a phased approach to development.
- Ensure that the draft Development Plan has regard to section 28 planning guidelines and is consistent with the relevant SPPR’s and national and regional objectives.
- Develop climate action as a cross cutting theme through all sections of the plan in line with the provisions of section 10(2)(n) of the Act
- Promote sustainable settlement and transport strategies within the County and identify measures, including targets for modal shift, to reduce GHG emissions, a reduction in energy use and adaptation to climate change.
- Promote healthy placemaking as an overarching consideration in the preparation of the Draft Plan in accordance with the provisions of the RSES.
- Ensure that the economic and employment policy contained in the Draft Plan takes account of identified needs arising from current and anticipated future trends and that the Plan identifies sufficient employment lands in appropriate locations to meet those needs
- Prepare a Green Infrastructure Strategy for the County that identifies opportunities to develop the green network within the County from a habitat, biodiversity, and ecological perspective and as a means of addressing climate change adaptation and mitigation.
- Review and update as necessary the Landscape Character Assessment for the County.
- Prepare a Strategic Flood Risk Assessment and ensure that land use zonings have regard to the requirements of the Planning System and Flood Risk Management Guidelines 2009
- Develop policies and objectives which support the delivery of the required infrastructure to promote and facilitate sustainable growth within the County

## **4.1.2 National Transport Authority**

### **Chief Executive’s Summary**

The NTA have indicated that “National and Regional transport policy emphasises the need to reduce the demand for travel and the reliance on the private car in favour of public transport, cycling and walking.”

#### **Guiding Principles as set out in submission**

For urban development, the development of lands, within or contiguous with existing urban areas should be prioritised over development in less accessible locations. This

is of particular relevance to the largest urban areas.

To the extent practicable, residential development in urban areas should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport, including infill and brownfield sites, are prioritised.

Larger scale, trip intensive developments, such as offices and retail, should primarily be focused into central locations in urban areas.

As intensively used, central locations, the management of space in town centres should deliver a high level of priority and permeability for walking, cycling and public transport modes. The key outcome of such an approach would be town centres that are accessible, attractive, vibrant and safe, as places to work, live, shop and engage in community life.

Planning at the local level should promote walking, cycling and public transport by maximising the number of people living within walking and cycling distance of their neighbourhood or district centres, public transport services and other services at the local level such as schools.

The density and location of residential and employment development should be fully permeable and maximise the potential for the use of walking, cycling and public transport. Retrospective implementation of measures should be undertaken where practicable.

Where possible, new residential developments should provide for filtered permeability, i.e. provide for walking, cycling, public transport and private vehicle access while restricting or discouraging private car through.

Trip destinations (employment sites, schools, retail, etc.) should be developed at locations that can maximise the potential to access such developments by walking, cycling or on public transport.

For all major employment developments and all schools, travel plans should be conditioned as part of planning permissions and be carried out in a manner consistent with existing NTA guidance.

It is recommended that, where a requirement is identified to produce a Local Transport Plan for an area within the County, this process should be guided by the NTA/TII document Area Based Transport Assessment.

It is recommended that the Development Plan includes sustainable transport indicators, including mode share, for the purpose of monitoring the efficacy of policies and development objectives against a range of sustainable development indicators.

### **Strategic Road Network**

In order to protect the strategic transport function of the national roads, including motorways, the NTA recommends that any development objectives should be in accordance with the DOECLG Spatial Planning and National Roads Guidelines (2012), and that this

should be referenced in the Development Plan. National Strategic Outcome 2 of the National Planning Framework indicates the need for “Maintaining the strategic capacity and safety of the national roads network including planning for future capacity enhancements”.

### **Integrated Implementation Plan**

In December 2019, the NTA published its Implementation Plan 2019-2024, which sets out a range of transport projects that will be delivered or commenced during the life of the Plan. (Projects are listed as part of the submission and requested to be considered in the preparation of the Draft Development Plan – these include Bus Investment (redesign of network, development of roll out of Bus Connects with radial and orbital corridors, improved interchange and bus facilities, Light Rail (network development, fleet and network enhancement), Heavy Rail (network development and enhancement, DART and electrification extension and Integration Measures (GDA Cycle Network, cycle and pedestrian permeability projects, traffic management, safety schemes, real time passenger information and integrated ticketing .

The submission acknowledges that the next Government Capital Investment Programme and Greater Dublin Area Transport Strategy will also frame investment in the County over the period of the Development Plan. Certainty as to the content of these documents is not likely to emerge until 2022.

The submission also recommends that the preparation of the Development Plan is informed by the following NTA guidance and in any event by more recent national and regional plans:

- The National Cycle Manual;
- Permeability Best Practice Guide;
- Achieving Effective Workplace Travel Plans: Guidance for Local Authorities;
- Workplace Travel Plans: A Guide for Implementers;
- Toolkit for School Travel; and
- Guidance Note on Area Based Transport Assessment (NTA and TII).

### **Car Parking Standards**

The submission recommends that all non-residential development proposals should be subject to maximum parking standards. In addition, in locations where the highest intensity of development occurs, an approach that caps car parking on an area-wide basis should be applied - of particular relevance to the larger urban areas.

### **Rural Transport**

The submission recommends that the Development Plan acknowledges the role rural transport services can perform in providing for social and economic connectivity between small villages/rural areas and larger towns within the County. The NTA provides rural transport services through the Local Link Rural Transport Programme. The NTA will develop and expand the Local Link Rural Transport Programme in the following manner:

- seek further integration with other public transport services, including HSE and school transport;
- ensure fully accessible vehicles operate on all services;



- enhance the customer experience;
- increase patronage among children and young people; and
- encourage innovation in the service.

## **Chief Executive's Opinion**

### **Guiding Principles**

The submission is acknowledged and welcomed. The submission welcomes the role which South Dublin County has in delivering National and Regional transport policy. This will be core to the success of the National Planning Framework which focuses on building sustainable communities, cities and places. That sustainable future can only emerge if it is supported by sustainable movement, fast, efficient, integrated public transport and a road network which has appropriate capacity, is well maintained and capable of supporting significant pedestrian and cycle usage safely.

It is considered that the County Development Plan should comply with the guiding principles as set out in the NTA submission. In this context the following is noted: -

- The Draft Plan should incorporate an evidence based Core Strategy that accords with the provision of the Planning and Development Act (as amended) and with the requirement of the NPF, the RSES and MASP for the Dublin metropolitan area and all relevant statutory guidance. The purpose of the Core Strategy is to articulate a medium to longer term quantitative and qualitative based strategy for the spatial development of the County, identifying the quantum, location, and phasing of proposed development, as well as growth scenarios. The Core Strategy will form the basis for land-use and transportation policies and objectives which will be core to the plan.
- It should support an efficient and effective transport system and encourage smarter travel choices based on available options, taking account of National and Regional Policy and Guidance.
- It should seek to promote greater use of public transport, increase walking and cycling, and direct growth around existing and planned services so that the demand for travel in general and for car-based travel is reduced.
- It should seek to ensure that all development - residential, commercial, economic etc. - will comply with the guiding principles set out in the submission all of which contribute to the delivery of places in which people want to live, work and play.

In order to inform the Plan the Council is carrying out a Sustainable Movement study which will yield appropriate policies and, where identified, concrete proposals across the county which will act as a vehicle for enabling the implementation of the guiding principles set out above.

- It should seek to develop sustainable transport indicators, including mode share, for the purpose of monitoring the efficacy of policies and development objectives against a range of sustainable development indicators.

### **Strategic Road Network**

The importance of the strategic road network is acknowledged and its role the continued economic success of the country ensuring efficient transport between countries is noted. The role of this network in connecting communities at the local level is also noted. It is considered that the Draft Plan should incorporate objective(s) requiring compliance with the DOECLG Spatial Planning and National Roads Guidelines (2012).

### **Car Parking**

It is considered that the role of car parking and its potential to generate car-based travel will need to be balanced against the availability of alternative transport options. Parking provision should be based on the practical question of whether or not the proposed number of spaces is justified, taking into account factors such as location and access to public transport. The Draft Plan should seek to comply with the recommendations of the NTA in this matter.

### **Integrated Implementation Plan**

For the reasons set out above and as has been the case in previous County Development Plans, South Dublin County is committed to continuing to support the delivery of any and all relevant transport projects plans at National, Regional and Local level

### **Rural Transport**

The role of rural transport networks in the county is acknowledged. The Draft Plan should continue to support the role rural transport services perform in providing for social and economic connectivity between small villages/rural areas and larger towns within the County and will seek to include objectives and policies to reflect this.

## **Chief Executive's Recommendations**

It is recommended that the Draft South Dublin County Development Plan 2022-2028 and its Core Strategy accords with the issues raised and the recommendations of the submission of the NTA. It is recommended that the Draft Plan policies and objectives address the transportation and mobility issues outlined in the NTA submission in the following ways:-

- Support and enable the delivery of transport project plans at national, regional and local level where appropriate and where resources allow.
- Ensure that the Development Plan reflects the policies and objectives contained within the National Planning Framework, the National Development Plan and the Regional Spatial and Economic Strategy, in particular:

- ensure that growth is directed toward existing and planned transport infrastructure with more intensive land uses and residential densities developed in close proximity to services and employment
  - seek to encourage walking and cycling by improving the walking and cycling environment
  - seek to ensure that improvements to the local road/street network are focused on improving facilities for cyclists and pedestrians to ensure that walking and cycling is a safer and more convenient option. The plan will seek to incorporate the concept of filtered movement.
  - Promote traffic management through behavioural change initiatives
  - Review policy and standards on the provision of car parking provision in new development across the county
  - develop sustainable transport indicators, including mode share, for the purpose of monitoring the efficacy of policies and objectives within the plan
- Incorporate policies and objectives to improve public transport services and work in partnership with national agencies to secure and develop improvements to the various transport networks.
  - Provide for ongoing liaison with TII and other national agencies, protecting the future capacity of national routes, such as the N4, N7, N81 and M50 to minimise the impacts on the management of the broader network.
  - Work with TII and other national agencies, to protect and enhance the capacity of national routes, such as the N4, N7, N81 and M50 to minimise the impacts on the management of the broader network
  - Support development, residential, commercial, and economic that adheres to the overarching principles of placemaking, sustainable movement, and sustainable communities which will enable the delivery of places in which people want to live, work and play.

### **4.1.3 Office of the Planning Regulator**

#### **Chief Executive's Summary**

The OPR welcomes the publication of the issue papers in advance of the review of the County Development Plan while also setting out their obligations under the Planning and Development Act 2000, as amended (the Act), to evaluate and assess development plans.

#### **Consultation strategies**

The office commends the planning authority for the innovative methods used to inform and engage the public about the review of the plan with particular reference to the format,

layout and design of the booklet and website content and videos along with the use of social media, branding, webinars and a virtual consultation room.

### **Core Strategy and Settlement Strategy**

The submission refers to the provisions of the NPF and the RSES with specific reference to the MASP and growth enablers and guiding principles for the growth of the Dublin Metropolitan Area.

In respect of compact growth, it is pointed out that the RSES makes a distinction between the targets for the built-up area of the city and other areas which is of relevance to South Dublin.

In this regard, the Core Strategy and Settlement Strategy will need to provide clarity on the anticipated delivery of housing and employment on greenfield and brownfield sites within the city's footprint and within individual settlements in the rural hinterland. The inclusion of specific policies and implementation measures that encourage such infill / brownfield development in the County's designated strategic development areas should be specific, targeted, and measurable (i.e. include monitoring measures).

The office refers to Local Area Plans at Fortunestown and Ballycullen-Oldcourt which, it is stated, have expired and recommends that the content of such plans be transposed into the new plan in so far as possible and to ensure that there is transparency in the Core Strategy regarding the remaining development yields from the expired LAPs.

The office highlights the requirement for the population targets for the County to be consistent with the RSES and the MASP and in this regard advises that a significant proportion of the County's future population growth be directed to

1. *Naas Road / Ballymount Strategic Development Area, which has potential for residential development and more intensive employment / mixed use*
2. *South western corridor (western suburbs) – SDZ lands and Kilcarbery*
3. *South western corridor (LUAS red line) – Tallaght Town Centre / Cookstown and Fortunestown / Saggart / Citywest*

The OPR, while recognising that guidelines and a HNDA toolkit has not yet been prepared at national level, advises the planning authority to prepare a HNDA which responds to the specific socio- economic trends identified at the neighborhood level and is consistent with National Policy Objective (NPO) 37 of the NPF and any guidance on HNDA issued by the Department of Housing, Planning and Local Government.

With specific reference to the future development of the Naas Road corridor the OPR draws the attention of the planning authority to section 9(4) of the Act in regard to the coordination of the objectives for both lands within South Dublin and Dublin City.

### **Development Standards and Building Height**

The Office notes the standards for apartment development in Chapter 2 Housing and Chapter 11 Implementation of the current development plan and advises that some of the standards and requirements are not consistent with the updated section 28 'Sustainable Urban Housing; Design *Standards for New Apartments, Guidelines for Planning Authorities* (2018).

In this regard, Specific Planning Policy Requirements 1-6 (inclusive) of these guidelines should inform the development management standards for apartment development in the forthcoming development plan including requirements for, inter alia, mix of unit types, minimum floor areas, building height and building separation distances.

Reference is also made to the provisions of the guidelines in regard to replacement of 'general blanket restrictions on building height or building separation distances and with more performance-based criteria appropriate to location as supported by the NPF.

The office makes further reference to the current plan provisions in regard to restricted building heights on lands zone RES-N noting inconsistency with relevant guidelines.

### **Economic Development and Employment**

The OPR notes the quantum of land zoned for *Enterprise and Employment* including remaining undeveloped land and welcomes the proposed review of employment lands as part of the process of making a new plan.

The OPR draws the planning authority's attention to the guiding principles for the location of strategic employment and investment prioritisation, and the guiding principles for the location of trip intensive developments in sections 6.3 and 8.3 of the RSES respectively. It is also advised that the review should also consider the requirements for lower density employment uses to inform a clear direction in the plan for such uses.

The potential to re-intensify older industrial estates such as Naas Road/Ballymount, brownfield lands in Tallaght/Cookstown and to provide for high tech and research and development employment at Grangecastle which are identified as strategic employment locations in the RSES

### **Economic Strategy and the Naas Road**

The Office encourages the planning authority to continue its engagement with Dublin City Council, the National Transport Authority and other key stakeholders such as the IDA in developing its economic and employment strategy for the forthcoming plan with particular reference to the Naas Road corridor.

### **Retail**

The Office notes that EMRA will support and drive the preparation of a new retail strategy for the region under the requirements of the *Retail Planning Guidelines for Planning Authorities* (2012), and that RPO 6.11 requires the future provision of significant retail development to be consistent with the aforementioned guidelines, and retail hierarchy at table 6.1 of the RSES until such time as this hierarchy is updated.

## **Transport and Infrastructure**

The Office welcomes the proposal to examine the current movement patterns around the county as part of the review of the plan. In this regard it is essential for the planning authority to promote alternatives to the private car in the county to meet the requirements under section 10(2)(n) of the Act. The Office indicates that compliance with the principle of integration of land use and transport may assist the planning authority in meeting the mandatory objective section 10(2)(n) of the Planning Acts.

The Office would encourage the planning authority to include modal shift targets to be achieved over the plan period, aligned to relevant implementation measures, in order to achieve meaningful improvements in GHG emissions and energy use in line with section 10(2)(n) of the Act.

A key issue for the next development plan is to ensure that policies protect the strategic function of national roads, maximise the benefits of existing and planned public transport investment and that local policies and development management standards regarding access to national roads including exceptional circumstances are consistent with the *Spatial Planning and National Road Guidelines (2012)*.

The Office recommends that the plan commit to the proactive implementation of the *Design Manual for Urban Roads and Streets* (as revised in 2019) in the required locations, consistent with RPO 9.10, will also assist sustainable and active transport modes, in addition to improvement in the street environment and overall quality of life of urban areas and settlements of all sizes.

The Office advises the planning authority to continue to work proactively with transport agencies and Irish Water to progress projects that deliver infrastructure to support development in strategic development areas consistent with the RSES.

## **Rural Development**

The Office acknowledges that a significant part of the county is predominantly rural and that these rural areas present different issues and opportunities in terms of supporting viable businesses, protecting rural amenity values and managing pressure for further rural one-off housing.

In regard to rural housing the OPR advises that the plan's policies will need to demonstrate consistency with NPO19 and NPO 20 and consider the practical implementation of appropriate policy objectives through suitable land activation approaches and proactive facilitation of the building of homes within the footprint of rural settlements through measures such as site acquisition and serviced sites consistent with NPO 18a and NPO 18b

## **Strategic Flood Risk Assessment**

The OPR advises against the use of information from the Office of Public Work's (OPW) Preliminary Flood Risk Assessment (PFRA) and arterial drainage benefitting lands maps to

inform the SFRA. The planning authority will need to take account of OPW Flood Relief Schemes and undertake adequate flood risk assessment to determine if there is sufficient information to inform zoning decisions or if furthermore detailed analysis is required.

### **Climate Action and Energy**

The Office highlights their requirements under section 31AM(2)(a) to address, in particular, matters within the scope of section 10(2)(n) of the Act and identifies that the transition to a low carbon economy and the overall reduction in carbon emissions will become a central issue for planning policies during the preparation of the plan.

The Office commends the planning authority for its renewable energy initiatives, such as the Tallaght District Heating Project, and welcomes the proposals to establish similar in other areas.

The Office directs the attention of the Planning Authority towards the promotion of renewable energy sources within the County and the requirement for the planning authority to indicate how the implementation of its development plan over its effective period will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resource (in megawatts). This will also need to reflect the specific characteristics and constraints of the area noting the conclusion in the current development plan regarding large scale wind energy infrastructure.

The Submission concludes by summarising the key areas to consider in the preparation of the County Development Plan.

### **Chief Executive's Opinion**

#### **Consultation Strategy**

The comments made by the OPR on the production and format of the Issues booklet and consultation strategy implemented are acknowledged and welcomed.

#### **Core Strategy and Settlement Strategy**

The Council acknowledges the requirements of Section 10(1)(A) and 10 (2)(A) of the Planning and Development Act 2000 (as amended) in regard to the contents of the Core Strategy and the requirements for the Development Plan to be consistent with inter alia the NPF, RSES and the MASP.

The Draft Plan will include specific policies and implementation measures that encourage infill / brownfield development in the County's designated strategic development areas, set out in the RSES, that are specific, targeted, and measurable.

Reference to Local Area Plans at Fortunestown and Ballycullen-Oldcourt are acknowledged. However, the following should be noted in both of these Local Area Plans;

*Ballycullen Oldcourt Local Area Plan - On the 7th May 2019, by resolution, the Local Area Plan was extended for further period (in accordance with Section 19 of the Planning and Development Act 2000, as amended). The Local Area Plan will now expire 2nd June 2024.*

*On the 12<sup>th</sup> June 2017, by resolution, the Fortunestown Local Area Plan was extended for further period (in accordance with Section 19 of the Planning and Development Act 2000, as amended).*

*The Local Area Plan will now expire on 13<sup>th</sup> May 2022.*

While both Local Area Plans alongside the Newcastle Local Area Plan have yet to expire, they will expire during the lifetime of the 2022-2028 County Development Plan.

Opportunities to transpose key policies and objectives into the new Draft plan will be investigated alongside a recognition within the Core Strategy of lands yet to be developed within the draft Core Strategy.

Regarding the Housing Need Demand Assessment, the Council acknowledges the provisions of NPO 37 in the NPF and the requirement for each Local Authority area to prepare a HNDA. While the Council welcomes the introduction of the HNDA as a key mechanism for understanding current and future housing market needs it is highlighted that, at present, no formal Departmental guidance has been made available in respect of carrying out a HNDA.

NPO 37 of the NPF refers to the establishment of a coordination and monitoring unit to assist Local Authorities and Regional Assemblies in the development of the HNDA and that this will involve developing a centralised spatial database for housing data that supports the HNDA being undertaken by Local Authorities. To date no such unit has been established. Furthermore, the RSES states that having regard to the significant influence that Dublin plays in relation to the housing and settlement patterns and demands within the Region, that a Regional HNDA would be appropriate for the four Dublin Local Authorities.

In the absence of the publication of any guidance documents and supporting material regarding the preparation of a HNDA it is intended to carry out a Housing Strategy (Needs Assessment) which will be underpinned by a robust baseline in regard to housing needs within the County capable of informing and guiding policies and objectives in the Draft Plan.

The Council will endeavour to implement the provisions of any forthcoming guidance on the matter should it be feasible within the statutory timeframe associated with the making of the County Development Plan.

Having regard to the future growth of the Naas Road area the Council has, to date, actively engaged with Dublin City Council. It is acknowledged that particular focus will be required to the co-ordination of objectives with Dublin City Council and the future growth of this area.

## **Development Standards and Building Height**

As part of the review process of the plan it is intended to prepare a Building Height and Density Guide which will have regard to the 'Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities' (2018) and the 4 SPPR's contained within in order to inform policy provision within the plan and guide future development.



## **Economic Development and Employment**

The Council acknowledges the guiding principles set out for locating strategic employment, investment prioritisation in placemaking and the integration of land use and transport as set out in sections 6.3 and 8.3 of the RSES. As part of the review process of the plan an economic analysis is currently being carried out which will identify opportunities and inform the quantum/location and types of employment to be located within the County in line with the RSES guiding principles and the provisions set out for the identified strategic employment corridors set out in the MASP.

Such analysis will also include an examination of the need for lower density employment uses including measures to address the issues of possible displacement/re-intensification of existing low density employment uses located on strategically identified regeneration lands such as the Naas Road and Tallaght.

The Council will continue to engage with relevant key stakeholders in developing the economic and employment strategy for the forthcoming Development Plan which provides an appropriate balance between residential development and the re-intensification of employment lands and mixed uses.

### **Retail**

The South Dublin County Retail Hierarchy is set out in the current development plan Chapter 5 table 5.1 and has been derived from the Retail Strategy for the Greater Dublin Area (2008-2016) and updated to take account of the existing scale and function of centres within the County. This table is consistent with the provisions of RPO 6.11 and table 6.1. The Draft Plan will carry forward such provisions for retailing within the County to facilitate and guide future growth of the retail sector within the County.

### **Transport and Infrastructure**

The promotion of alternatives to the private car in accordance with section 10(2)(n) of the Act alongside the provisions of RPO's 8.1 and 8.4 of the RSES will form a key element within the transport section of the Draft County Development Plan. Research and analysis are currently ongoing in conjunction with the NTA to identify infrastructural and other measures which will contribute towards a modal shift away from the private car. A key aspect of this work will be the development of modal shift targets over the short, medium, and longer term which will contribute towards the transition to a climate resilient low carbon County.

Chapter 6 of the current Plan sets out a number of objectives aimed at protecting the strategic function of the national road network while also promoting existing and planned public transport investment. The Draft Plan will review and update as necessary these existing objectives alongside continuing to work in conjunction with transport agencies, including the Department of Transport, The NTA, Transport Infrastructure Ireland (TII) to deliver improvements and extensions to the strategic road network.

A specific action of Section 6.4.3 of the current Plan relates to the implementation of the DMURS for all new roads and streets within urban areas within the County. Such provisions

will be carried forward into the Draft Plan taking into consideration the revisions made in 2019.

The Council will continue to work in conjunction with all infrastructural agencies to progress projects in line with the provisions set out in the RSES and the MASP. Such provisions will be reflected in the Draft Plan.

### **Rural Development**

The provisions of NPO18a, 18b, NPO19 and NPO20 are noted in regard to the provision of rural housing. It is recommended that the policies in the Draft plan are prepared having regard to the most up to date and available guidance including the provisions set out in the NPOs of the NPF and Circular Letter PL 2/2017 relating to local needs criteria.

### **Strategic Flood Risk Assessment**

The Draft plan will be accompanied by a Strategic Flood Risk Assessment.

### **Climate Action and Energy**

The contents of the submission are noted. The Council are committed towards the delivery of a low carbon climate resilient County in line with the provisions of section 10(2)(n) of the Act. Climate Action will form a key cross cutting theme integrated throughout the different sections and chapters of the Draft plan.

### **Chief Executive's Recommendations:**

It is considered that that the Draft Plan policies and objectives address the issues outlined in the OPR submission in the following ways:

- Prepare a Core Strategy, Housing Strategy and Settlement Strategy in line with the requirements of the Planning and Development Act 2000 (as amended) and consistent with the objectives of the NPF, RSES and the MASP.
- Include specific policies and implementation measures that encourage infill / brownfield development in the County's designated strategic development areas that are specific, targeted, and measurable.
- Facilitate a co-ordinated approach to the future development of the Naas Road area with Dublin City Council and relevant stakeholders
- Ensure that the draft Development Plan has regard to section 28 planning guidelines including 'Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities' (2018); DMURS; Rural Housing Guidelines and the Wind Strategy guidelines and relevant amendments and is consistent with the relevant SPQR's and national and regional objectives.
- Ensure that the economic and employment policy contained in the Draft Plan takes account of identified needs arising from current and anticipated future trends and that the Plan identifies sufficient employment lands in appropriate locations to meet those needs

- Review and update, as necessary, existing objectives relating to the strategic road network and continue to work with transport agencies, including the Department of Transport, The NTA, and Transport Infrastructure Ireland (TII) to deliver improvements and extensions where required.
- Prepare a Strategic Flood Risk Assessment and ensure that land use zonings have regard to the requirements of the Planning System and Flood Risk Management Guidelines 2009
- Develop climate action as a cross cutting theme through all sections of the plan in line with the provisions of section 10(2)(n) of the Act
- Promote sustainable settlement and transport strategies within the County and identify measures, including targets for modal shift, to reduce GHG emissions, a reduction in energy use and adaptation to climate change.

## 4.2 Chief Executives Summary, Opinion and Recommendations on submissions relating to the Strategic Issues



## 4.2.1 Built Environment and Placemaking

### Chief Executive's Summary

There were 65 issues raised in relation to the strategic issue of Built Environment and Placemaking. More than just promoting better urban design, placemaking facilitates creative patterns of use, paying particular attention to the physical, cultural, and social identities that define a place and support its ongoing evolution. Therefore, the main issues raised are summarised under the headings of Physical Aspects, Cultural Aspects and Social Aspects of placemaking as set out in the table below.

Topic: Built Environment and Placemaking	Issues Raised	% of Total
Physical Aspects	28	43%
Cultural Aspects	32	49%
Social Aspects	5	8%
	65	100%

## Summary of Issues Raised

### Physical Aspects

The LDA supports the emphasis on placemaking and the need to deliver higher density mixed-use developments appropriate to their location in terms of type, scale, form and density, that is more compact and liveable to reduce urban sprawl in line with the LDA's vision. ([SD-C147-227, Land Development Agency](#))

A number of the submissions call for the Draft Plan to embrace the concept of the '15 Minute City' or similar type vision for walkable hubs in our towns, villages, communities and underutilised landbanks in South Dublin. The 15 Minute City is described as an urban planning concept focusing on community planning, the local economy, and the liveability of a city and is based on designing walkable communities or hubs in which people can live and access most of their daily needs within 15 minutes of active transport. Reference is made to 'Dublin: The 15 Minute City report' published by the Dublin Chamber and the 'How Walkable is Your Town?' report by Age Friendly Ireland. ([SD-C147-156, Dublin Chamber](#)) ([SD-C147-94, Elizabeth Hickey](#)) ([SD-C147-174, National Disability Authority](#)) ([SD-C147-106, Green Party Tallaght](#)) ([SD-C147-141, Ross O'Mullane](#)) ([SD-C147-56, Paul Murphy](#)) ([SD-C147-227, Land Development Agency](#))([SD-C147-63, Hibernia REIT](#))

The OPR notes the standards for apartment development in Chapter 2 Housing, and Chapter 11 Implementation of the current 2016-2022 development plan and advises that some of the standards and requirements are not consistent with the updated section 28 'Sustainable Urban Housing; Design Standards for New Apartments, Guidelines for Planning Authorities (2018). In this regard, it is stated that Specific Planning Policy Requirements 1-6 (inclusive) of these guidelines should inform the development management standards for apartment development in the forthcoming development plan including requirements for, inter alia,

mix of unit types, minimum floor areas, building height and building separation distances. The OPR also references the provisions of the guidelines regarding the replacement of general blanket restrictions on building height or building separation distances with more performance-based criteria appropriate to location as supported by the NPF. The OPR makes further reference to the current plan provisions in regard to restricted building heights on lands zone RES-N. ([SD-C147-144, Office of the Planning Regulator](#))

A further submission expressed the need for the Draft plan to incorporate all national and regional policies and guidelines relevant to South Dublin, including all Section 28 Ministerial Guidelines. ([SD-C147-39, James McNerney Planning Consultant](#))

One submission requests that the high density housing that is planned for the REGEN area in Tallaght to be very high quality and an attractive place where people would want to live. ([SD-C147-203, Betsy Omidvaran](#))

A further submission highlights the potential for the County to be exemplar for urban-rural transitional building design including infrastructure, rather than a dormitory suburb in the Greater Dublin region. ([SD-C147-16, Rathcoole Community Council](#))

A further submission suggests having minimum building standards for sustainable metrics. ([SD-C147-106, Green Party Tallaght](#))

A submission questions whether industrial buildings have their own architectural merit, should this value not be visible to the community rather than hidden behind the banking up of topsoil around industrial building sites to form a boundary, usually planted with trees, such as in Grange Castle? ([SD-C147-49, Niall Charleton](#))

A request that the impacts of Covid-19 influence design and layout of residential and urban areas to allow for adequate space for social distancing and increased green and outdoor space for health and safety purposes. ([SD-C147-157, Yvonne Collins](#))

Dublin Bus recommends that proximity of public transport links and other sustainable modes such as cycle tracks and adequate footpath space be a primary consideration in any place-building project or housing development design. It is further suggested that the design and layout of housing development should encourage the use of the local public transport links which should be invested in to ensure there is sufficient capacity and frequency to handle this increased demand. ([SD-C147-95, Dublin Bus](#))

One submission calls for effective estate management companies supported by a planning and legal framework. ([SD-C147-17, Rathcoole Community Council](#))

A further submission recommends the increased use of the derelict sites register in order to improve the aesthetics of the county and unlock revenue. ([SD-C147-96, Public Participation Network](#))

The Department of Arts, Heritage and the Gaeltacht recommends the inclusion of an objective whereby all public buildings and public open spaces in the county would incorporate positive biodiversity measures as standard practice such as nesting boxes for

swifts, bat boxes and/or bat bricks, the creation of wildlife habitats on public open spaces. ([SD-C147-143, Dept. of Arts, Heritage and the Gaeltacht](#))

One submission suggests that planters should be installed to act as barriers and decorate streets to brighten up public spaces with associated street lighting. ([SD-C147-198, Carly Bailey](#))

A further submission suggests ways of improving neighbourhoods generally including providing nice paving and lighting, better traffic management, a library, a 50-metre swimming pool, hanging baskets, playground, seating, better parking, improvements to buildings, remove big ad hoardings, dedicated space for temporary traders, a farmers market type area, a focal point such as sitting area, fountain, monument, statue, good transport facilities, a festival and other community events, more facilities for people of all ages, and providing more public art such as on electricity and traffic boxes, walls and gable ends, bus stops and so on, with dedicated areas and grants for artists and encouraging scheme similar to Tidy Towns across the county that focuses more on neighbourhoods and estates. It is also suggested that the Local Authority create its own app so people can interact more with the Council. The same submission also calls for the Local Authority to follow up on issues raised using the 'Fix My Streets' website. ([SD-C147-141, Ross O'Mullane](#))

The DoAHG recommends the use of warmer colours in exterior lighting to avoid environmental impacts associated with blue-rich LED light. A further submission requests the provision of public lighting in association with decorative planters, while another seeks improved lighting. Other submissions in relation to lighting are addressed in the relevant sections of the CE Report. ([SD-C147-143, Dept. of Arts, Heritage and the Gaeltacht](#)) ([SD-C147-198, Carly Bailey](#)), ([SD-C147-168, Saggart Village Residents' Association](#))

TII recommend that the erection of signage on national roads and roads running parallel to national roads, and along the Luas line, be tightly regulated for road and rail safety and environmental reasons and encourages the Local Authority to have regard to national policy and guidance such as TII's 'Policy on the Provision of National Roads (2011) and the DoECLG's Spatial Planning and National Roads Guidelines. ([SD-C147-36, Michael McCormack, Transport Infrastructure Ireland](#))

One submission calls for root and branch review of all signage and the removal of anything that is not required. ([SD-C147-141, Ross O'Mullane](#))

## **Cultural Aspects**

Several submissions advocate the importance of protecting, preserving and promoting built heritage within the County with calls for the identification of historic buildings in disrepair and the establishment of a mechanism to force owners to preserve them. It is also proposed that a dedicated chapter should be reserved for cultural, archaeological heritage and architectural heritage. ([SD-C147-87, Deirdre tierney](#)) ([SD-C147-169, South Dublin Conservation Society, South Dublin Conservation Society](#)) ([SD-C147-202, Cllr Alan Hayes](#)) ([SD-C147-143, Dept. of Arts, Heritage and the Gaeltacht](#))

A submission has identified Heritage, Conservation and Landscape Policies from the existing County Development Plan and has made recommendations to amend the associated wording within the new Plan. ([SD-C147-222, Keep Ireland Open, Keep Ireland Open](#)).

A number of submissions made suggestions for inclusion on the record of protected structures or amendments to such, and recommendations for Architectural Conservation Areas. Other submissions requested that existing structures on the RPS are restored. There were calls for additional heritage resources within the Council and a new RPS to be undertaken. ([SD-C147-171, Records Residents Association](#)) ([SD-C147-52, Vincent Hyland](#)) ([SD-C147-59, Fergal Swaine](#)) ([SD-C147-165, Jonny Edgar](#)) ([SD-C147-133, Teresa Costello](#)) ([SD-C147-63, Hibernia REIT, Hibernia REIT](#)) ([SD-C147-190, Eoin "Broin"](#))

Submissions have called for reuse or adaptation of existing protected structures to alternative uses in order to provide continued security of the heritage value of these buildings, attendant grounds and associated natural features and have also sought Specific Local Objectives relating to same within the new County Development Plan. ([SD-C147-126, Simon Clear & Associates](#)) ([SD-C147-226, Brock McClure](#))

Suggestion that villages and towns should have a focal point to hold festivals, farmer markets and cultural activities from these spaces and promote Dublin Canvas Project. ([SD-C147-198, Carly Bailey](#))

A submission calls for increased efforts to encourage the use of the Irish language by only using Irish names on streets and estates and encouraging Irish names on shop fronts while a further submission calls for the Draft Plan to promote the use of the Irish language in the County. ([SD-C147-82, Declan Hanley](#)) ([SD-C147-190, Eoin "Broin"](#))

A number of submissions have called for the restoration/refurbishment of Silver Bridge between Strawberry Beds and Waterstown Park. ([SD-C147-52, Vincent Hyland](#)) ([SD-C147-59, Fergal Swaine](#)) ([SD-C147-165, Jonny Edgar](#))

## **Social Aspects**

EMRA welcomes the recognition of the need to promote social inclusion and create sustainable communities in line with the principle of Healthy Placemaking which underpins the RSES (Section 9.4 ) and to RPO 9.2 which promotes active participation and social integration of minority groups in planning for diverse needs, and to RPOs 9.14 to 9.17 in relation to planning for the provision of recreation and open space facilities, to support the creation of healthy and attractive places. EMRA also makes reference to town centre renewal and RPOs 6.12-6.14 which support placemaking and the revitalisation of urban centres. ([SD-C147-31, EMRA](#))

A submission seeks the promotion of Traveller culture. ([SD-C147-141, Ross O'Mullane](#))



The need for public space and infrastructure to be planned with accessibility and inclusion in mind was expressed, particularly for more vulnerable members of the community, including the provision of seating and tactile paving. It was also requested that greater emphasis be placed on creating liveable and sustainable neighbourhoods, where persons with disabilities can live full and active lives as part of a real community. A further submission requests that the CEUD's Universal Design guidelines, should become the minimum standard for new social housing build projects. ([SD-C147-174, National Disability Authority](#)) ([SD-C147-96, Public Participation Network](#))

## 4.2 Chief Executive's Opinion

### Physical Aspects

The County Development Plan has a key role to play in shaping and influencing the physical, cultural and social identity of the County and its neighbourhoods. The three key principles of the RSES relating to Healthy Placemaking (along with Climate Action and Economic Opportunity) which aim “to promote people’s quality of life through the creation of healthy and attractive places to live, work, visit, invest and study in” will form a key cross cutting theme in the preparation of policies and objectives of the Draft Plan. This aligns with a core value of South Dublin’s Corporate Plan to actively support the Healthy Ireland goals (national health policy goals) where health and well-being are valued and supported at every level of society.

Strengthening the connection between people and the places they share through effective and healthy placemaking seeks to create vibrant urban centres with a diverse mix of retail, residential and commercial functions and high quality public spaces that are accessible across all societal needs, ages and abilities.

Policy in the draft plan will take account of the location and design of new buildings in relation to their proximity and connectivity to public and active transport modes.

One of the guiding principles in the RSES is to “Support the ‘10 minute’ settlement concept, whereby a range of community facilities and services are accessible in short walking and cycling timeframes from homes or accessible by high quality public transport to these services in larger settlements”. This is very similar to the concept of the 15 Minute City. The Local Authority is committed to reviewing and updating policy and provisions within the current Development Plan in order to align the Draft Plan with the overarching planning policy at national and regional level. The compact growth model which will form a key element of the core strategy for the draft Plan in accordance with the NPF and RSES will help to facilitate the 15-minute city concept.

The Draft Plan will have regard to section 28 planning guidelines including ‘Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities’ (2018) and the ‘Urban Development and Building Heights Guidelines for Planning Authorities’ (2018) and will be consistent with the relevant Special Planning Policy Requirements (SPPRs) and national and regional objectives.

As part of the review process of the plan it is intended to prepare a Building Height and Density Guide for inclusion in the draft Plan. This will have regard to the 'Urban Development and Building Heights Guidelines for Planning Authorities' and other relevant guidelines including SPPR's and will inform policy provision through performance-based criteria.

The Draft Plan will also have regard to the design criteria set out in Sustainable Residential Development in Urban Areas (2009) and the companion Urban Design Manual (2009) and the Sustainable Rural Housing - Guidelines for Planning Authorities (2005).

Building standards are covered by the Building Regulations where sustainable metrics would be more properly addressed.

The Local Authority notes the suggestion that industrial buildings should play a greater role in terms of informing the architectural character of an area. The current development plan includes key principles for development proposals within designated enterprise and employment zones based on criteria for access and movement, open space and landscape, and built form and corporate identity. This will be reviewed as part of the draft Plan preparation.

The impact of Covid-19 on how we think about our outdoor public spaces, pedestrian footpaths, cycle lanes and providing for more natural, biodiverse environments is widely acknowledged. Policies and provisions will be developed in the Draft Plan which reflect the longer-term needs of people many of which needs were brought to light during the pandemic. The preparation of a Green Infrastructure Strategy and a review of open space policy will identify opportunities to develop the green network within the County as a means of addressing connectivity while also contributing positively towards climate change, wellbeing, and biodiversity.

Pedestrian and cyclist permeability and connectivity to public transport corridors will also be a key consideration in placemaking policy and in this regard Cycle South Dublin will have a key role. A mobility study is also being carried out as part of the preparation of the draft Development Plan which will further inform policy in the Plan and improve access to active and public transport.

Issues raised in relation to estate management companies are noted. Planning conditions are attached where relevant to planning permissions requiring the formation of management companies. However, the running of individual management companies is not a matter which can be addressed in the development plan.

Improving neighbourhoods through the support of various infrastructure, planting and events is strongly supported in principle. However, not all of these improvements can be incorporated into policy in the development plan as many of them are operational issues for different departments or bodies and outside the remit of the development plan. The

development plan will continue to promote policy around community and cultural facilities, open space quality and quantity and the built environment.

Pedestrian areas are lit to the Local Authority's current design standards.

Street naming and numbering is required to be submitted to the Planning Authority in both English and Irish. Objectives HCL18 Objective 2: 'To promote the Irish Language and favour its use in the promotion of the Villages Initiative' and HCL18 Objective 3: 'To promote local heritage, the naming of any new residential development will reflect the local and historical context of its siting, and should include the use of the Irish language' are contained in the current plan and it is considered that this policy should be retained.

The issue raised by TII is noted and it is recognised that the draft plan needs to have regard to the DoECLG's Spatial Planning and National Roads Guidelines and other policy documents. The current Development Plan contains detailed and comprehensive policies and provisions in relation to signage. This will be reviewed having regard to the recently agreed signage strategy for South Dublin. Unauthorised signage is covered by legislation such as the Planning and Regulations 2001 (as amended) and the Litter Pollution Act 1997 (as amended) and enforcement is pursued as appropriate.

## **Cultural Aspects**

Built heritage, whilst informing the physical form and identity of our built environment, has an even greater significance and importance within the cultural aspects of placemaking.

Part IV, Chapter 1 of the Planning & Development Act 2000 as amended sets out the legislation regarding Protected Structures. Section 58 specifically refers to the 'duty of owners and occupiers to protect structures from endangerment'. The issue of the disrepair of Protected Structures and related enforcement is not a matter that can be dealt with in the context of the County Development Plan.

Section 2 of The Planning and Development Act 2000, as amended, gives a definition of protected structures and sets out what is deemed designated as part of that inclusion, which extends to the interior, exterior, lands and structures within said lands within the curtilage.

The current development plan seeks to preserve and conserve architectural and archaeological heritage and promote the county's cultural heritage and includes a Record of Protected Structures (RPS) and Architectural Conservation Areas which will be carried forward in the Draft Plan. A full review of the RPS and ACA's was carried out as part of the current 2016-2022 Plan. Individual proposals for inclusion on the RPS and ACAs as appropriate, will be reviewed and assessed as part of the preparation of this Development Plan.

All submissions in relation to the refurbishment of the Silver Bridge. The principle of providing access across the bridge is something which is supported but land ownership issues at this time on both sides of the Liffey Valley make delivery challenging. It is noted

that the bridge is in the ownership and control of Fingal County Council. A feasibility Study has been carried out on the bridge by Fingal County Council and was presented to the Lucan/Clondalkin/Fonthill area committee members in May of this year by the consultant engineer acting for Fingal, Lisa Eddin.

## **Social Aspects**

With regard to the promotion of Traveller culture, the Draft Plan will continue to support social inclusion as an overarching issue to be addressed in the Plan. Sites for traveller accommodation will be identified as part of the preparation of the plan in line with the Housing Strategy and Traveller Accommodation Programme. South Dublin's Corporate Plan has as one of its core values the prioritisation of social inclusion, equality of access and opportunity, and the needs of the most vulnerable people in society when designing and delivering services.

The Irish language is promoted in the current Plan and this policy should continue. It is also noted that the Draft Plan will be made available in Irish.

The promotion of universally accessible community infrastructure forms part of the current Development Plan and should continue to inform policy. At a regional level, the RSES state that "Local authorities and relevant agencies shall ensure that new social infrastructure developments are accessible and inclusive for a range of users by adopting a universal design approach and provide for an age friendly society in which people of all ages can live full, active, valued and healthy lives". The Local Authority is committed to aligning the policies and provisions of the Draft Plan with national and regional policy and its own core values. As a participant in the Age Friendly Programme for Ireland, South Dublin's Development Plan will have regard to the guidelines and toolkits provided by Age Friendly Ireland such as 'Being Age Friendly in the Public Realm' and 'Age Friendly Towns – A Guide' in the preparation of the Draft Plan.

Specific building standards are covered separately by the building regulations including Technical Guidance Document M – access and use. This is not a matter within the remit of the Development Plan.

## **Chief Executive's Recommendations**

The recommendations below include the relevant recommendations for the neighbourhood areas as they relate to this strategic issue.

It is considered that that the policies and objectives of the Draft Plan:

- Promote quality of life for all generations through the creation of healthy and attractive places to live, work, visit, invest and study in as an overarching consideration in the preparation of the Draft Plan.

- Promote a high standard of building and urban design, creating public spaces that are distinctive, safe and accessible and facilitate social and cultural diversity and interaction.
- Promote compact growth, the prioritisation of active travel and the promotion of increased densities along public transport corridors in line with the NPF and RSES.
- Ensure that section 28 planning guidelines and associated special planning policy recommendations inform the policies and objectives of the Draft Plan.
- Promote a high standard in the delivery and on-going maintenance of infrastructure and utilities to enhance the built environment
- Review the policies, standards and provisions on signage and strengthen where appropriate in the Draft Plan having regard to the signage strategy agreed by the Council in 2020.
- Continue to support and promote social inclusion, access for all and universal access in line with national and regional policy.
- Ensure that the Housing Strategy recognises the diverse needs of all of South Dublin’s citizens meeting, insofar as is feasible, their diverse accommodation needs
- Provide for the protection, preservation and promotion of the built heritage, including architectural heritage and archaeological heritage
- Examine measures to encourage the retention and re-use of historic structures within the County
- Recognise the value of cultural heritage to the County and support the implementation of the South Dublin Heritage Plan

## 4.2.2 Climate Action and Energy

### Chief Executive's Summary

A total of 43 issues were raised under this topic.

Topic	Issues Raised	% of Total
National/Regional Context	12	28%
Low Carbon/Carbon Neutral	7	16%
Energy and Buildings	14	33%
Climate Action – Practicality and Implementation	6	14%
Public Transport - bus	1	2%
Wind Energy	3	7%
Total	43	100%

### 1.1 National/Regional Context

The focus in the Issues papers on Climate and Energy is welcomed, in keeping with the RSES Key Principle on Climate Action, supported by RSOs 6-11. The submission sets out that the information contained at Chapters 4, 7, 8 and 10 of the RSES will also assist the Local Authority in developing an integrated climate policy, in particular Section 7.9 Climate Change and the related RPOs address the need for decarbonisation of the transport, built environment and energy sectors. The Council is also directed to Section 10.3 'Energy' and the Guiding Principles to support the roll out of smart grids and future energy networks enabling the promotion of renewable energy sources, in line with RPO 10.19. The future CDP will also be required to include measures to assess and monitor progress on carbon reduction targets, in line with RPO 3.6 of the RSES. To this end, it should be noted that EMRA is leading an ESPON EU research programme (QGasSP) to identify a robust method for quantifying the relative GHG impacts of alternative spatial planning policies, the outputs of which may inform the upcoming review of the development plan ([SD-C147-31 Pauline Riordan, EMRA](#))

Submission considers the Plan should align with National Climate Change Mitigation and Adaption commitments set out in the 'Climate Action Plan 2019', 'Ireland's Greenhouse Gas Emissions Projections for 2018-2040' (EPA 2109) and 'Integrating Climatic Factors into the Strategic Environmental Assessment Process in Ireland' (EPA 2019).([SD-C147-38, Cian O'Mahony, Environmental Protection Agency](#))

All elements of the County Climate Action Plan should be included and given priority in the new CDP. The next Climate Action Plan should be specified in this CDP to be even more ambitious than this current Climate Plan. Calls for a priority to be placed on increasing the tree cover in the county and fostering of hedgerows to aid the delivery of climate actions. ([SD-C147-203, Betsy Omidvaran](#))

Submission states that potential impacts of climate change include increased rainfall intensities, increased fluvial flood flows and rising sea levels. Development should be avoided in areas subject to flooding. ([SD-C147-41, Rachel Woodward, Office of Public Works](#))

The submission notes the link between climate change and flooding and notes that the RSES recommends the preparation of Flood Risk Management Plans. Submissions request the inclusion of an objective in the Draft Plan requiring the council to have regard to proposed Flood Relief Schemes within SDCC when considering development. ([SD-C147-41, Rachel Woodward, Office of Public Works](#))

Irish Water is focused on addressing the impacts of climate change and states that it is preparing a strategy to address national and global climate change legislation. It also draws attention to the Water Services Policy Statement 2018-2025 and the more recent Climate Change Sectoral Adaptation Plan for Water Quality and Water Services Infrastructure 2019. Irish water expresses its wish to work closely with Councils to ensure the overarching principles of mitigating against and adapting to climate change is achieved. ([SD-C147-57, Niamh McDonald, Irish Water](#))

Sustainable Development Goals should be evident throughout the new Plan and they should be linked to the various goals within the plan. They provide a common language for tackling shared, diverse issues, such as poverty, gender equality, food security, decent work, and climate change. ([SD-C147-202, Cllr Alan Hayes](#))

The submission welcomes the Climate Change Action Plan (2019) and the new Development Plan review recommending they should be collaborative documents. It recommends the following:

Ensure Sustainable Development Goals are at the core of our new Plan, in order to rebuild resilient communities.

Recommends that the plan should explore measures such as development of Eco-Villages, expanding biodiversity, explore the use of solar power to help achieve our carbon reduction targets ([SD-C147-96, Kieran Walsh, Public Participation Network](#))

DoCHG recommends that the policies and objectives set out in the 'Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage' are integral to all policies and objectives of the new South Dublin County Development Plan. These policies focus on mitigation and adaptation measures to protect our archaeological heritage. ([SD-C147-143, Manager Dau, Dept. of Arts, Heritage and the Gaeltacht](#))

The EMRA submission recommends that the Plan in tandem with Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) offers an opportunity for additional assessment of greenhouse gas emissions subject to the availability of an agreed methodology at national level. ([SD-C147-31 Pauline Riordan, EMRA](#))

The Chamber requests that the new Development Plan support the sustainable compact growth of South Dublin and its transition to a low carbon, climate resilient, and high-density

County playing an integral role in the Dublin region. The entire Dublin Metropolitan Area needs to focus on its resilience as a built-up urban area and commit to sustainable land management and resource efficiency to assist in the transition towards a low carbon society. ([SD-C147-156, Marian O'Donnell, Dublin Chamber](#))

The County Development Plan should ensure a rapid phasing out of all fossil fuels including gas, the next plan should not allow the expansion of the gas grid and should ban fracked gas in its energy mix. ([SD-C147-186, Aideen O'Dochartaigh, Not Here Not Anywhere](#))

A number of submissions have noted that compact growth allows for more efficient public transport, more efficient energy demands such as combined heat and power units to combat climate change and will allow natural habitats to be protected. These have been addressed in the section on Population Growth and Housing.

## **Chief Executive's Opinion**

There is a consistent theme across all submissions referring South Dublin County Council to international, national and regional policy documents for their application and their inclusion within the County Development Plan. These policy documents, which include, inter alia: the UN Strategic Development Goals, 'The Regional Spatial and Economic Strategy, 2019-2031', the 'Climate Action Plan, 2019', 'Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage, 2019', 'The Planning System and Flood Risk Management Guidelines,(2009)', circulars and '(Draft) Climate Change Sectoral Adaptation Plan for Water Quality and Water Services Infrastructure 2019'. These documents refer to climate action, the need for decarbonisation of the transport, built environment and energy sectors as well as setting carbon reduction targets, reducing Greenhouse Gases, managing water quality and flood relief.

It is considered that climate action should be an overarching and cross-cutting theme of the Draft Plan and should inform policies and objectives for the built and natural environment and environmental, water and transport infrastructure. Existing policies will be augmented and guided by South Dublin County Council's Climate Change Action Plan (CCAP) 2019-2024. In preparing the Draft County Development Plan all relevant national and regional policy documents, including those mentioned in the above submissions, will be taken into consideration to ensure that the Plan's policies and objectives provide for appropriate and measurable climate actions for all spatial planning proposals during the lifetime of the plan and beyond. '*Delivering Effective Climate Action 2030*' sets out a roadmap for how local authorities can lead in the effort to tackle that challenge, collaborating at a national level and working locally.

It is confirmed that that the Strategic Environmental Assessment process will include assessment of climate action measures, any national guidance available will inform that assessment. Where appropriate, the Appropriate Assessment process will also take account of climate change. Furthermore, climate action, the need for decarbonisation of transport, built environment and energy sectors as well as setting carbon reduction targets, reducing Greenhouse Gases, managing water quality and flood relief will all be reviewed in the drafting



of the plan and will be dealt with across the themes/chapters of the Plan and policies and objectives will be informed by the SFRA.

## **Chief Executive's Recommendations**

The recommendations below include the relevant recommendations for the neighbourhood areas as they relate to this strategic issue.

It is considered that that policies and objectives in the Draft Plan:

- Include climate action as an overarching and cross-cutting theme across the Draft Plan in line with policies and objectives contained in the NPF and RSES and national legislation.
- Support compact growth as a means of delivering on climate action through efficient use of public transport, active travel and achieving greater energy efficiencies.
- Include policies and objectives which will support the national Climate Action Plan 2019 and South Dublin County Council's Climate Change Action Plan 2019-2024 in the transition of South Dublin County to a low carbon and climate resilient economy and society.
- Encourage the decarbonisation of the transport, built environment and energy sectors and facilitate the transition to a low carbon economy and society in line with government policy and legislation.
- Seek to set targets and indicators based on the policies and objectives within the draft Plan to monitor the achievement or otherwise of a reduction in the county's carbon footprint.
- Ensure that surface water management and flood risk measures are considered as part of climate mitigation and adaptation

## **Low Carbon / Carbon Neutral**

The OPR highlights the requirements under section 31AM(2)(a) to address, in particular, matters within the scope of section 10(2)(n) of the Act and identifies that the transition to a low carbon economy and the overall reduction in carbon emissions will become a central issue for planning policies during the preparation of the plan. ([SD-C147-144, Maude Ni Bhrolchain, Office of the Planning Regulator](#))

Ban single use plastics in the county by 2024. Aim to be Carbon Neutral Council by 2028 ([SD-C147-141, Ross O'Mullane](#))

In preparing the draft County Development Plan, Coillte request that the Council promote the use of sustainable timber products in the Development Plan policies and objectives. ([SD-C147-53, Aoife McCarthy, Coillte](#))

Outside the development of this plan, the council should lead annual local climate dialogues which serve to inform communities about the ongoing transition to a low carbon society and seek their opinions, ideas and consent. ([SD-C147-186, Aileen O'Dochartaigh, Not Here Not Anywhere](#))

The South Dublin County Development Plan 2022-2028 presents a great opportunity to incorporate actions that will help in Ireland's overall efforts transition to a low-carbon economy by 2050, in line with the Paris Accord. Calls on SDCC to set a target of planting three native trees and shrubs for every person in the County by the end of 2028, equating to approximately 1 million additional trees and shrubs. ([SD-C147-103, John Kiberd, Litter Mugs](#))

Support and establish community energy projects throughout lifetime of the county development plan. ([SD-C147-186, Aileen O'Dochartaigh, Not Here Not Anywhere](#))

Support should be provided for all community attempts to deliver Community Energy projects as well as County wide proposals. ([SD-C147-73, Eugene Barrett, Knocklyon Network](#))

## **Chief Executive's Opinion**

A wide range of themes were raised in these submissions. The need to focus future policy on low carbon or carbon neutral initiatives was apparent across the submissions. A range of suggested policy initiatives were raised including a reduction in the use of plastic, increasing the use of sustainable timber and the planting of trees to help meet climate target. Several submissions suggested that dialogue between the Council and communities take place to help achieve these targets. The Council should support community energy initiatives throughout the life of the Plan.

The importance of factoring climate change adaptation and mitigation measures into the plan is acknowledged. The Council is obliged to meet national and regional climate action targets and the Draft Plan will incorporate policies and objectives that will endeavour to achieve these. Paramount to the Draft Plan will be those actions that will seek a smooth transition to a low-carbon economy and an overall reduction in carbon emissions. It is considered that a suite of policies and objectives should be developed for inclusion in the Draft Plan to achieve this. A range of measures in support of national and regional policy in the areas of solar energy, thermal energy, use of electrical vehicles, district heating and support of sustainable energy across the county will be considered. In addition, the inclusion of policy and objectives that support low carbon projects across the County, including tree planting. Furthermore, the Draft Plan will be subject to Strategic Environmental Assessment monitoring which will assess the impact of proposed policy initiatives to ensure they are implementable and measurable. The local authority has been working with the NTA to consider objectives for a targeted modal shift over the lifetime of the Plan. This would help to ensure that climate action objectives are measurable.

## **Chief Executive's Recommendations**

The recommendations below include the relevant recommendations for the neighbourhood areas as they relate to this strategic issue.

It is considered that that the policies and objectives of the Draft Plan:

- Incorporate climate action mitigation and adaptation measures into and throughout the plan in compliance with national and regional policy guidance (NPF, RSES) and relevant legislation.
- Support and encourage the transition to a low-carbon economy and an overall reduction in carbon emissions as we move towards the 2050 targets for a carbon neutral economy.
- Support a range of alternative energy measures including but not limited to solar energy, thermal energy, use of electrical vehicles, district heating and local/micro generation.
- Recognise the role that the natural environment has to play in the mitigation and adaptation to climate change.

## Energy and Buildings

Any data centre in SDCC area should be operated on a carbon neutral basis and their physical footprint kept to an absolute minimum. ([SD-C147-25, Thomas Gallagher](#))

The energy performance of our building stock should be enhanced to reduce costs to the end user. Government focus should, however, be on the decarbonisation of the energy grid where the greatest impact on climate change would be felt. ([SD-C147-75, Hugh Durkin Nigel Smith](#))

New data centres must be powered by onsite or new off-site renewable energy, with existing centres required to transition rapidly to onsite or new off-site renewables and where technically possible, heat recovered from Data Centres should be utilised for district heating systems. ([SD-C147-186, Aideen O'Dochartaigh, Not Here Not Anywhere](#))

Submission suggests the promotion of district heating systems, the use of nature based solutions to flooding, promote the use of biogas and solar, provision of roof-top gardens on buildings and the installation of more water fountains and deposit schemes for recyclables. ([SD-C147-198, Carly Bailey](#))

The submission supports a drive towards climate action and more sustainable energy generation, including the performance of the building stock to reduce costs to the end user. Government focus should however be on the decarbonisation of the energy grid where the greatest impact on climate change would be felt. ([SD-C147-74, Hugh Durkin](#))

Suggests retrofitting older housing stock and development of local energy sources within new residential developments to encourage sustainability, such as small wind turbines, to combat climate change. ([SD-C147-87, Deirdre tierney](#))

The use of renewable gas avoids the need for deep retrofits to convert properties to a suitable BER rating for electric heat pumps to work effectively and should be a consideration for the Council when evaluating the options for decarbonising council housing stock. ([SD-C147-108, Fiona O'Connor, Gas Networks Ireland](#))

SDCC should work with all the businesses in the County to reduce carbon emissions and energy usage. This might be encouraged through different rate levels depending on your score on an energy /pollution scale. ([SD-C147-73, Eugene Barrett, Knocklyon Network](#))

The Council needs to work with Government/SEAI to deliver grants or assistance to homes to upgrade their BER to levels that will reduce amounts of heating required. ([SD-C147-73, Eugene Barrett, Knocklyon Network](#))

Suggest using energy created by data centre for supporting heating networks should be supported. ([SD-C147-94, Elizabeth Hickey](#))

Suggests residents to be encouraged and financially supported to retrofit their dwellings to improve energy efficiencies. ([SD-C147-94, Elizabeth Hickey](#))

Submission suggests that SDCC ensure our social housing uses innovative building methods and practices to mitigate impacts on climate and biodiversity. ([SD-C147-106, Liam Sinclair, Green Party Tallaght](#))

The submission raises concerns that commerce is a large contributor of carbon emissions. SDCC must insist on a 'carbon footprint declaration' and a plan for meeting Climate Action Plan targets for all industrial developments. It considers data centres are not suitable in our densely built county and should no longer be considered. ([SD-C147-106, Liam Sinclair, Green Party Tallaght](#))

The ESB highlight the importance of renewable energy installations such as Leixlip Hydro Electric Station, which are integral to our fight against climate change. The ESB also calls for the Draft Plan to support the delivery and continuation of a secure and resilient supply of energy that optimises the use of the renewable energy resources of the County to address climate change, support job creation and the move to a competitive low carbon Green Economy, while also protecting the environment and amenities of the county. ([SD-C147-185, Electricity Supply Board](#))

## **Chief Executive's Opinion**

Generally, the submissions called for the enhancement of energy efficiency across the entire county, including that of the existing building stock, retrofitting of older residential properties (including social housing) the use of innovative building methods in new housing stock and industrial-type buildings to encourage sustainability and to mitigate impacts on climate. A number of the submissions recommended the use of renewable energy sources, including wind energy, hydro energy, solar energy and renewable gas and for the focus to be placed on the decarbonising of the energy grid. Suggestions on how to meet climate targets within the built environment included: the promotion of district heating systems, the use of nature based solutions within our building stock to reduce flooding, promoting the use of biogas and solar and provision of roof-top gardens on buildings and the

installation of more water fountains and deposit schemes for recyclables. Several submissions raised concerns regarding the impact of business and industry on climate.

The Local Authority actively promote and support sustainable energy use and renewable energy in the current Development Plan. The National 2050 Climate Objective for Ireland as set out in the Climate Action and Low Carbon Development (Amendment) Bill 2020 is to pursue the transition to a climate resilient and climate neutral economy by the end of the year 2050. The existing County Development Plan comprises energy policies and objectives, which include amongst other items the promotion of district heating schemes. These existing policies and objectives will be reviewed and strengthened in collaboration with CARO and Codema and in conjunction with the environmental assessments. The promotion and implementation of renewable energy sources within the County's built environment including residential, industrial, commercial and public owned structures will be important during the lifetime of the next plan and the Draft Plan will reflect this. Investigations, based on the findings of the Energy Performance of Buildings Directive, are ongoing and will help to inform the Draft Plan.

It is considered that policies and objectives relating to Data Centres, district heating schemes, energy performance in the county's building stock, encouragement of community projects all supporting the decarbonisation of the county should be investigated for inclusion within the draft development plan.

## **Chief Executive's Recommendations**

The recommendations below include the relevant recommendations for the neighbourhood areas as they relate to this strategic issue.

It is considered that that the policies and objectives in the Draft Plan:

- Encourage and promote a transition to a low carbon, climate resilient, County by reducing the need for energy use; ensuring energy efficiencies in building design and using green / renewable energy sources.
- Investigate implementable objectives, including indicators capable of being monitored for progress, for inclusion within the Draft Plan.
- Support the role of South Dublin as a leader in the transition towards a reduction in carbon through appropriate policies and objectives in the draft plan.
- Ensure that the draft Plan includes a review of energy policy to align with the NPF, the RSES and national legislation.

- Ensure the built environment is climate change ready by supporting climate change mitigation and adaptation measures into new and existing development

## **Public Transport – Bus**

Public transport is an inherently sustainable form of travel and a vital part of reducing our overall emission levels and creating a more climate resilient South Dublin County. One full Dublin Bus has the capacity to take 80 cars off the road...which equates to 92% less gCO<sub>2</sub> per kilometre travelled. SDCC should:

- Introduce demand management measures, taking the form of Park and Ride facilities, Automatic Number Plate Recognition (ANPR) to help police bus lanes and a reduction in the number of available carparking spaces.
- As the technology develops, on street charging infrastructure around South Dublin County may be necessary to ensure that electric buses have the ability to travel along some longer routes.
- Focus on turning away from consistent prioritisation of road improvement for private modes towards investment in low emission public transport and active travel.
- Align housing and transport strategies to future proof all new housing development with the goal of creating a more climate resilient and liveable South Dublin County in mind. ([SD-C147-95, Dublin Bus, Dublin Bus](#))

## **Chief Executive's Opinion**

The Dublin Bus submission raised a wide range of relevant issues. It argues that public transport is a sustainable form of travel which is vital in reducing the county's overall emission levels. The submission made suggestions on how to encourage the use of buses including introducing demand management measures, policing of bus lanes and on street charging infrastructure around the county for the charging of electric buses. It argues that the focus of policy should be away from the prioritisation of road improvement for private modes and towards investment in public transport and active travel together with aligning housing and transport strategies.

It is agreed that public transport and active travel are sustainable forms of travel that will reduce emission levels. The County Development Plan is limited to spatial planning and a number of issues raised are outside of the remit of the County Development Plan such as Automatic Number Plate Recognition (ANPR), the policing of bus lanes and the charging for infrastructure. However, policies and issues raised around Park and Ride facilities, the number of available carparking spaces, the prioritisation of investment in low emission public transport and active travel need to be addressed in the Draft plan. The Draft Plan should include measures to encourage both public transport and active travel within the County. (See also the Sustainable Movement and Population Growth and Housing sections of this report).

## **Chief Executive's Recommendations**

The recommendations below include the relevant recommendations for the neighbourhood areas as they relate to this strategic issue.

It is considered that that the Draft Plan includes policies and objectives that:

- Include measures that promote and support sustainable forms of travel including public transport and active travel (walking and cycling) within the county and to work closely with the NTA and other national and local agencies to achieve this.
- Explores options for the advancement of sustainable transport through the prioritisation of investment in low emission public transport and active travel and the provision of Park and Ride facilities for accessing public transport (where appropriate)

## Wind Energy

Coillte requests that SDCC in the preparation of the CDP, with respect to renewable energy:

- Include policies and objectives in the Plan that recognise, promote and facilitate on-shore wind and commit to ensuring the renewable energy potential of the county is maximised to achieve the most recent national targets.

- Recognise and respond to the scale and urgency of climate change as part of the County Development Plan review process by preparing/updating a Renewable Energy Strategy for the County based on the new national targets and the principles of the SEAI LARES.

- Lead the EMRA region in developing a consistent approach to key RES issues including a consistent approach to identifying suitable lands and categorising landscape sensitivity.

Ensure that wind speed, site specific engineering issues, and existing grid capacity issues are not considered constraints in identifying suitable lands, and ensure a sufficient quantum is identified to account for site level attrition.

- Reconsider the attachment of conditions of finite duration to wind farm permissions.

- Recognise the DHPLG Wind Energy Development Guidelines and any updates thereof, as the appropriate national standard rather than seeking to alter or replace the requirements therein.

- Work in partnership with other government agencies and third parties, including the public, to achieve these goals. ([SD-C147-53, Aoife McCarthy, Coillte](#))

Recommendation in relation to ENERGY (E) Policy 9 Wind Energy and associated provisions in the existing Plan – Undertake an analysis of suitable areas for wind energy. ([SD-C147-222, Keep Ireland Open, Keep Ireland Open](#))

Irish Wind Energy Association (IWEA) highlights the role that wind energy can play in SDCC's aspirations to become as low a carbon county as possible by increasing energy efficiency and unlocking renewable energy potential. IWEA believes it is now necessary to provide for the spatial planning of wind energy and electricity transmission infrastructure on a regional basis, rather than at the Local Authority level as has been the case to-date. If a sufficient quantum of land to accommodate 15-20GW of new wind energy has to be identified to ensure 4.2GW is actually installed by 2030, this target should be divided out between the three Regional Assembly areas. Allocating a clear target of 6GW per region, requires the areas of least landscape sensitivity with the greatest landscape capacity to be identified to ensure an average of 1.4GW of new wind energy can actually be delivered in each region by

2030, which is the only way of ensuring the 4.2GW overall national target is achieved. ([SD-C147-189, Denis Devane, IWEA LTD](#))

Within this section a review of the Council's wind energy and adoption/update of the Renewable Energy Strategy for the County based on the new national targets and the principles of the SEAI LARES is requested. All three submissions promoted the use of wind energy to meet national targets on renewable energy.

## **Chief Executive's Opinion**

The importance of wind energy in meeting the renewable energy requirements of the country is acknowledged. A wind energy strategy is included in the current 2016-2022 Development Plan carried out in accordance with the Wind Energy Guidelines. As part of the review of the 2016-2022 County Development Plan a full wind energy assessment was carried out in accordance with national guidance. A landscape character assessment which informed the wind strategy was also carried out and is being updated as part of the preparation of the draft Plan. Policy arising out of the Wind Energy Strategy for South Dublin does not provide for large scale wind energy infrastructure due largely to the coincidence of wind speeds and various constraints including Natura sites. However, policy does encourage small to medium scale wind energy developments and supports small community-based proposals in urban areas. Should any revised national guidance be published the Planning Authority will review the existing policy.

The Council will work in partnership with other government agencies and third parties, including the public, to meet national renewable energy targets. The planning authority, in collaboration with Codema are reviewing and investigating the potential for all sustainable and renewable energy sources throughout the County to meet our climate action targets and reduce the reliance on carbon.

## **Chief Executive's Recommendation**

It is considered that that the Draft Plan include policy and objectives to:

- Promote renewable energy informed by national policy and landscape character assessments.

## **Climate Action – Community Involvement and Implementation**

The Climate Action and Environment office within the council must be adequately resourced, publicised and staffed. These offices should work closely with local communities to improve education and access to information around environmental issues, proactively engage in consultations and participatory processes which allow local people to have a say in the energy transition in their area ([SD-C147-186, Aideen O'Dochartaigh, Not Here Not Anywhere](#))

Wherever practically possible, participatory processes should be designed in a participatory way, with input from representatives of all groups who are expected to take part in the



participatory process. Special outreach efforts must be made to include disadvantaged or marginalised groups in participatory processes. Those running participatory processes should keep a detailed record of the participation of marginalised groups and of best practices that serve to increase this participation. ([SD-C147-186, Aideen O'Dochartaigh, Not Here Not Anywhere](#))

Submission suggests SDCC lead and engage citizens on climate change and biodiversity and work with central Government to enhance environmental enforcement capacity. ([SD-C147-106, Liam Sinclair, Green Party Tallaght](#))

Submission raises concerns regarding potential impacts of climate change and impacts on future developments. Specific development management objectives are recommended and cognisance of the flood maps is required. ([SD-C147-41, Rachel Woodward, Office of Public Works](#))

The Council should make every effort to reduce the carbon emissions and energy usage in its capacity to deliver the services provided. Other suggestions include that the SDCC should encourage community energy projects, increases tree planting and biodiversity, reduce reliance on the car and encourage carpooling and similar projects to enable this. ([SD-C147-73, Eugene Barrett, Knocklyon Network](#))

The use of electric vehicles for Council vehicles ([SD-C147-198, Carly Bailey](#))

Several submissions requested or supported community involvement in energy projects to work alongside the Council to achieve successful climate actions. They requested that community involvement include education and access to information to facilitate full participation. Other submissions were concerned about implementation of climate action policies.

## **Chief Executive's Opinion**

The County Development Plan is limited to spatial planning and land use. A number of issues raised above are outside of the remit of the County Development Plan document such as the resourcing and staffing of the Environment Office. However, these ideas have been noted.

The Planning Department of South Dublin County Council instigated a thorough and engaging pre-draft public consultation strategy that ran for eight weeks between July and September 2020. The strategy was designed to reach out across all sections of the County and its stakeholders. A detailed record of the consultation is contained within this report. The Council will continue to engage with the public and stakeholders throughout the Development Plan process. Several submissions suggested that dialogue between the Council and communities take place to help achieve these targets. The Council should support community energy initiatives throughout the life of the Plan.

## **Chief Executive's Recommendations**

The recommendations below include the relevant recommendations for the neighbourhood areas as they relate to this strategic issue.

It is considered that that the Draft Plan include policy and objectives to:

- Support community energy initiatives throughout the life of the Plan.
- Enable the Council to continue the practice of leading by example such as in relation to the upgrade of BER's in Local Authority housing, the operation of the municipal fleet and the construction of community buildings.
- Seek to include Climate Action measures in the Development Management functions of the Local Authority.

## 4.2.3 Population Growth and Housing

### Chief Executives Summary of Issues Raised

There were 91 issues raised in relation to the high-level topic of Population Growth and Housing. The main issues in relation to this high-level topic are set out in the following table;

Topic:	Issues Raised	% of Total
Compact Growth	19	20%
Core Strategy	27	30%
Housing Delivery, Tenure and Type	39	43%
Rural Housing	6	7%
Total	91	100%

### Compact Growth

Submissions received outline the importance of compact growth in our urban areas and centres focusing on towns, villages and historic streets, creating mixed use housing and employment emphasising that it must be delivered in tandem with public transport / social infrastructure for existing and new communities. A further submission highlights that compact growth should be linked with transport and urban centres based on 20-min city concept. [A number of submissions dealt with this concept and are further addressed in the Built Environment and Placemaking section of this report].

Submissions also highlight the benefits of compact growth in reducing greenhouse gases and creating sustainable communities. It is indicated that all new developments should be plan-led and sequential from the inner centres to the periphery, especially the larger brown/greenfield sites, focusing on public transport orientated layouts which account for existing and planned transport nodes including Park and Ride facilities to meet housing need.

Other submissions welcome the approach to compact growth, urban density, mixed-housing typology, retail and commercial on brownfield regeneration lands in line with National and Regional Planning policy. There is a need in the Draft Plan to identify areas where increased residential densities are linked to public transport and deliver on the opportunities set under the MASP. The submissions highlight that by promoting sustainable forms of infill / brownfield redevelopment in existing urban areas or public transport nodes it protects and creates land management for biodiversity and green belts and creates a more efficient energy demand combating climate change.

The National Transport Authority submission requests the Draft Plan is guided by land use policies which prioritise development in accessible areas first (existing or planned) before considering other areas and that large-scale trip intensive uses are promoted in central urban locations.

Submissions outline the need to reverse the trend of completed houses taking place along the periphery, contrary to National and Regional Policies. It is indicated by the OPR that a

significant proportion of the County's population growth should be towards the Dublin Metropolitan Area Strategic Plan growth corridors for housing and other uses, comprising: Naas / Ballymount and South west Corridor (western suburbs and LUAS Red Line) ensuring engagement with surrounding Local Authorities, key stakeholders and land owners key to the success of mixed-use compact growth.

([SD-C147-227, Land Development Agency](#)), ([SD-C147-100, Olive O'Malley](#)), ([SD-C147-163, Wellsea Properties Ltd](#)), ([SD-C147-156, Dublin Chamber](#)), ([SD-C147-29, National Transport Authority](#)), ([SD-C147-96, Public Participation Network](#)), ([SD-C147-31, EMRA](#)), ([SD-C147-214, David Kennedy](#)) ([SD-C147-95, Dublin Bus](#)), ([SD-C147-2, Proinsias Fhlannchadha](#), [SD-C147-5, Conor Mulligan](#)), ([SD-C147-63, Hibernia REIT](#)), ([SD-C147-144, Office of the Planning Regulator](#)), ([SD-C147-141, Ross O'Mullane](#)), ([SD-C147-198, Carly Bailey](#)), ([SD-C147-95, Dublin Bus](#)),

## **Core Strategy**

### **Alignment with National and Regional Planning Policy Context**

The OPR and EMRA along with other submissions highlight the need for the Draft Plan to be consistent with the published Section 28 Ministerial Guidelines, and to ensure the Draft Plan aligns with all National and Regional vision, policies and objectives, including the Dublin Metropolitan Area Strategic Plan and growth enablers for Dublin.

The submissions from the OPR and EMRA request the Draft Plan to align with the population targets under the NPF Implementation Roadmap, NPO 68 of the NPF and Appendix B of the RSES. It is requested that the Draft Core Strategy look at the components of household demand through the preparation of an evidence-based Housing Needs Demand Assessment at the neighbourhood level with the possibility of a sub-regional HNDA for the Dublin Local Authorities in line with NPO37 of the NPF and policies 9.3 and 9.5 of the RSES. The assessment should include a survey of vacant homes and the rate of vacancy, and the Draft Core Strategy should examine and incorporate the remaining lands to be developed from the current Development Plan, Strategic Development Zones and Local Area Plans. One submission requests the Draft prioritises the capacity sites identified under the current plan.

Other submissions highlight that recent CSO population data, analysis of housing demand and available zoning under the current Development Plan indicate the figures under Appendix B of the Regional Plan are conservative and could lead to a shortage of housing to meet the further demand. It is suggested that the Draft Plan includes a headroom of 50% or greater in the zoned land for housing this need.

Submissions request the Local Authority to examine all available land to ensure there is sufficient zoned land for recreational, commercial, tourism and community uses and in particular to mixed-use housing which is proximate to existing and proposed public transport nodes and infrastructure radiating outwards, in line with opportunities of the Regional Plans with potential to develop high density infill urban redevelopment to promote sustainable movement within the County. ([SD-C147-64, Cairn PLC](#)), ([SD-C147-31, EMRA](#)), ([SD-C147-144, Office of the Planning Regulator](#)), ([SD-C147-159, Quintain Developments Ireland](#)

[Limited](#)), ([SD-C147-197, South Dublin Environmental Network](#)), ([SD-C147-63, Hibernia REIT](#)), ([SD-C147-53, Coillte](#)), ([SD-C147-224, Cunnane Stratton Reynolds](#))

Submissions, including EMRA and OPR, request the Draft Core Strategy include measures to achieve compact urban development targets as outlined under the National and Regional Planning Policy context with particular focus on areas within or contiguous to the built-up area of Dublin City and Suburbs.

The sites identified by the MASP provide the opportunity to ensure a steady supply of sites alongside key public transport projects and requisite infrastructure investment. In illustrating such measures, the Draft Core Strategy and Settlement Strategy should provide clarity on the anticipated delivery of housing and employment on greenfield and brownfield sites within the city's footprint and within individual settlements in the rural hinterland. ([SD-C147-31, EMRA](#)), ([SD-C147-144, Office of the Planning Regulator](#))

### **Settlement Hierarchy**

The submission requests the Draft Plan, in the context of Covid-19, to consider more flexibility to the pattern of development of SDCCs towns and villages, allowing for a higher proportion of greenfield development for larger homes, homeworking, larger private open space or countryside.

The submission from EMRA acknowledges the clustering of neighbourhoods for the purposes of spatial consultation around strategic issues and opportunities and recommend the settlement strategy should be in line with the RSES and Regional Policy Objective (RPO) 4.3 and Table 4.2 and Table 4.3. Consideration should be given to the definition of settlements located outside the Dublin City and suburbs boundary, as lower tier settlements. Such settlements should be distinct from those areas that are located within or contiguous to the existing built up area of 'Dublin city and suburbs' ([SD-C147-75, Hugh Durkin- Nigel Smith](#)), ([SD-C147-31, EMRA](#))

### **Infrastructural Assessment and Implementation**

Both EMRA and the OPR outline the need for the Draft Core Strategy to have a clear evidence based rationale for the provision of adequate zoned land which is tiered in line with NPF NPOs 72 (a), (b) and (c), and RSES RPO 4.2 and aligned with the NPF/RSES population targets is highlighted. Consideration of phasing and prioritisation of development lands in collaboration with infrastructure providers over the lifetime of the Draft Plan and beyond in a manner which meets demand in the short to medium term should also be considered.

The submission from EMRA requests the Draft Plan to include specific policies and implementation measures that encourage infill / brownfield development in the County's designated strategic development areas in line with RPO 3.3 and prioritise sites in line with the MASP. These policies and implementation measures should be specific, targeted, and measurable (i.e. include monitoring measures).

A submission proposes a 'use it or lose it' objective on large key landbank sites is put forward to ensure planning permissions are implemented in a timely manner. Submissions note that the Draft Plan needs to retain flexibility to provide for ongoing opportunities for increased densities, reduced vacancy and the re-use of underutilised lands within the Metropolitan area through the possible use of strategic local objectives which reflect the local context of existing infrastructure and transport in proximity to the site.

Further submissions request the Draft Plan include strategic policies, objectives and interventions together with flexible Development Management Standards, to ensure and facilitate timely housing supply which is of a high standard to meet the needs of the population without relying on large development sites which may not be delivered in the lifetime of the Plan.

A number of submissions, including the OPR, consider that policies for developing brownfield / underutilised sites should look at the technical and financial feasibility of areas in order to determine targeted zoning objectives and active land management measures that will drive the regeneration of brownfield/infill sites with particular emphasis placed on the areas of Tallaght/Cookstown and the Naas Road/Ballymount area.

Further submissions emphasise the need for a balanced approach to the future development of regeneration lands in a manner which provides for a mix of housing and employment uses and avoids unnecessary displacement of established economic engines within these areas.

An emphasis is placed the OPR and EMRA on the need for implementation measures to be in line with guidance under forthcoming Draft Development Plan Guidelines. Regeneration areas should have a clear framework for developing the lands, identifying land ownership, listing Council projects and identifying and prioritising projects, if eligible, for Urban Regeneration Development Fund. The Draft Plan should ensure a phasing and prioritisation of enabling infrastructure to ensure a steady supply of strategic development lands in the Dublin Metropolitan Area (Table 5.1 of the RSES).

[\(SD-C147-144, Office of the Planning Regulator\)](#), [\(SD-C147-63, Hibernia REIT\)](#), [\(SD-C147-31, EMRA\)](#), [\(SD-C147-227, Land Development Agency\)](#), [\(SD-C147-159, Quintain Developments Ireland Limited\)](#), [\(SD-C147-224, Cunnane Stratton Reynolds\)](#)

## **Housing Delivery, Tenure and Type**

### **Housing General**

The submissions highlight the need to construct houses as fast as possible at affordable prices, stating concern that the Planning Authority are focusing on compact growth without considering the impact of such policy on housing and village centres at local level. [\(SD-C147-18, Jos Fullam\)](#), [\(SD-C147-78, RROLR Resident's Group\)](#)

### **Housing - Housing Mix and Tenure**

Submissions request the Draft Plan discourages or places a ban on co-living, build-to-let housing, studios alongside a reduction of 1-bed apartments to include more family sized homes, and by promoting mixed tenure including homeownership leading to stronger communities.

A submission highlights that there is an undersupply of apartments in the County, and it is requested that the Draft Plan examine this further and identify sites where increased supply especially in built-up areas can occur to give people options to stay in their local communities based on housing need. ([SD-C147-197, South Dublin Environmental Network](#)), ([SD-C147-198, Carly Bailey](#)), ([SD-C147-63, Hibernia REIT](#)), ([SD-C147-106, Green Party Tallaght](#))

A submission highlights that through greater densities and compact growth, an increasing supply of tenure and unit type choices will allow for down-sizing and 'right-sizing' in a manner which adapts to specific housing needs change within communities. EMRA recommends the Draft Plan aligns with RPO 5.5, RPO 9.1 and RPO 9.3 which supports a mix of housing types and tenure to widen the housing stock appeal to families and wider demographic area including social and affordable units in the metropolitan area, in line with national guidelines. The submissions highlight the need to increase tenure choice and housing types within easy access to Open Space while another suggests the Draft Plan includes a SLO to create a demographic and tenure mix. ([SD-C147-171, Records Residents Association](#)) , ([SD-C147-73, Knocklyon Network](#)),, ([SD-C147-106, Green Party Tallaght](#)), ([SD-C147-174, National Disability Authority](#)), ([SD-C147-63, Hibernia REIT](#)), ([SD-C147-31, EMRA](#)), ([SD-C147-200, Tallaght Community Council](#)), ([SD-C147-61, South Dublin Chamber](#))

Submissions welcome the phasing out of the Strategic Housing Development (SHD) planning application process and express the need to review the current Development Plan and Local Area Plan policies to ensure that SHD developments are accounted for in delivering services. The Draft Plan should be used as a tool to counteract national planning policies at a local level as granted SHDs are considered to be Build-to-Rent which do not create true placemaking or encourage people to live and work.

([SD-C147-198, Carly Bailey](#)), ([SD-C147-202, Cllr Alan Hayes](#)),

The submissions highlight current issues with increased household occupancy rates and family sizes in the County and the importance of increased housing supply to enable homeownership as a tenure with a greater quantum of 1-2 bed units to form part of the supply to cater for multi-generational living, increasing the mobility in the housing stock across the community.

Other submissions request the Draft Plan to ensure a mix of bedspaces for private and social residential developments and that apartments are provided with common rooms, utilities and play spaces. A further submission requests the Planning Authority to lobby the Government to increase the minimum floor spaces in all apartments to accommodate home-based working. ([SD-C147-63, Hibernia REIT](#)), ([SD-C147-190, Eoin Ó Broin](#)), ([SD-C147-198, Carly Bailey](#))

Submissions note that the population is living longer and growing older and population including people with disabilities is increasing. The Draft Plan should highlight the need for the provision of alternative housing options for older people and with disabilities comprising own door independent living access, which promotes community care concept to free up larger family homes (3,4 and 5 bed houses). Lands within neighbourhood areas should be examined for suitability for such houses. ([SD-C147-174, National Disability Authority](#)), ([SD-C147-87, Deirdre tierney](#)), ([SD-C147-198, Carly Bailey](#)), ([SD-C147-96, Kieran Walsh, Public Participation Network](#))

### **Housing - Design of Houses**

Submissions expressed a need for all private and public residential units to accommodate homeworking with appropriate infrastructure or other flexible uses and spaces.

Further submission considers the Draft Plan should promote the development of Universal Design Homes which have long term social and environment benefits in line with the Programme for Government, , '10 Ways to Construct a More Lifetime Adaptable and Age Friendly Home' guidelines and Wexford County Development 2013 – 2019 to ensure housing supply incorporates the right mix of universally designed homes for older people and people with disabilities. ([SD-C147-198, Carly Bailey](#)), ([SD-C147-174, National Disability Authority](#)), ([SD-C147-200, Tallaght Community Council](#))

### **Housing - Energy Efficiency**

The need to promote a programme to upgrade the energy efficiency of public housing and ensure social housing units in all areas caters for all aspects of the population is highlighted. Such measures should be carried out in combination with the re-use of heat energy from data centres and placing an emphasis on locating housing near transport corridors ([SD-C147-198, Carly Bailey](#)), ([SD-C147-56, Paul Murphy](#)), ([SD-C147-215, An Taisce, South County Dublin Local Association](#))

### **Housing - Housing Strategy and Social Inclusion**

The submissions highlight the need to remove the threshold for access to Social Housing so that it is accessible to all and that the provision of Part V contributions to social housing stock should be a true reflection of the development scheme and not the least desirable houses or cheapest. Adequate social housing for larger families and 1-bed units is required. Another submission requests the Local Authority not to sell public land to private developers for profit. It is also considered that the Draft Plan encourage commitments for cost rental and affordable housing.

Further submissions request; a neighbourhood level housing strategy be carried out and that the Draft Plan support and work jointly with relevant agencies, including the SDCYPS members, on the current and future needs of areas categorised as 'very disadvantaged' or 'disadvantaged, homeless families, children and young people, improving existing facilities



in 'hubs' and providing supports to navigate the housing system. ([SD-C147-198, Carly Bailey](#)), ([SD-C147-197, South Dublin Environmental Network](#)), ([SD-C147-106, Green Party Tallaght](#)), ([SD-C147-190, Eoin Ó Broin](#)). ([SD-C147-150, South Dublin Children Young People Services Committee](#)), ([SD-C147-200, Tallaght Community Council](#))

## **Rural Housing**

Submissions request the Draft Plan consider local need for rural housing for people who continue local traditions and farming beside or within the land and that existing/new suburban homes are not suitable for farming requirements. The submission requests the Draft Plan facilitates this by including rural housing maps to determine suitability of a site for housing. It is also requested that written statement of the Development Plan sets out precisely what is meant by 'in exceptional circumstances' contained within zoning Objective 'RU' ([SD-C147-51, Paula Lee](#)), ([SD-C147-67, James McInerney Planning Consultant](#)), ([SD-C147-7, Joe Cully](#))

Submissions highlight the need for the Draft Plan rural housing policy and objectives to be clear to applicants and demonstrate consistency with NPO19 and NPO 20, consider the practical implementation of such policy objectives and encourage the building of homes within the footprint of rural settlements through measures consistent with NPO 18a and NPO 18b. ([SD-C147-144, Office of the Planning Regulator](#)), ([SD-C147-67, James McInerney Planning Consultant](#))

## **Chief Executive's Opinion**

### **Compact Growth**

The submissions raised in relation to compact growth are acknowledged. The review of the Development Plan will seek to build on the policies and objectives contained in the current 2016-2022 Development Plan. Full regard will be had to the National and Regional Planning Policy Context and the designated growth areas identified within those plans will inform the Core Strategy.

The Council recognises the importance of compact growth (NSO 1 of the National Plan) as a central theme for development at National and Regional planning level, noting the long-term benefits of this pattern of growth out-weigh the short-term development of greenfield sites which require new infrastructure whether it is transport, utilities or social infrastructure.

The Metropolitan Area Strategic Plan includes an integrated land-use and transport strategy plan for the Dublin Metropolitan Area with compact growth and development along existing and planned transport infrastructure central to the delivery of this plan.

Making efficient use of available land resources and infrastructure within our urban footprint, integrating land use and transport, forms a key approach to climate change and to the creation of sustainable communities and should be supported in the Draft Plan.

### **Core Strategy**

The requirements for an evidenced based analysis of the developable land in the County to ensure that an appropriate quantum of zoned land, in the right location, is delivered over the Draft Plan period 2022 – 2028 to meet the needs of the population are noted.

The submissions raised in relation to the Core Strategy are acknowledged and noted. The Draft Plan will seek to build on the policies and objectives contained in the current Development Plan to ensure alignment with National and Regional Planning Policy.

In this regard the Draft Plan will incorporate an evidence-based core strategy that accords with the provisions of the Planning and Development Act (as amended) and existing Section 28 Ministerial Guidelines at the time of writing.

The Draft Core Strategy will articulate an evidence-based strategy for the spatial development of the County which aligns with the RSES and MASP. Informed by the assessment of current zoned lands in the County, the Draft Core Strategy will identify the quantum, location and phasing of zoned land to accommodate housing and employment across greenfield and brownfield lands, in line with existing and proposed investment in transport and other infrastructure.

Zoned lands will be tiered based on the findings of the Infrastructure Assessment in line with NPOs 72 (a), (b) and (c), and RSES RPO 4.2.

The Draft Core Strategy will incorporate National and Regional Objectives to achieve compact urban growth development targets of at least 50% of all new homes within or contiguous to the built up area of Dublin City and Suburbs and a target of at least 30% for other urban areas.

The Draft Core Strategy and Housing Strategy will include: population targets set by the RSES Appendix B as amended by NPO68 of the NPF as required; requirements for zoning of lands for residential, employment and or mixed uses and; outline the existing and proposed future distribution of population within the Plan area within a Settlement Hierarchy that is consistent with the Settlement Strategy set out in the Regional Spatial Economic Strategy. The Neighbourhood Areas will align with this approach.

The Draft Plan will align with the principles of growth for the region that are set out in the Regional Spatial Economic Strategy and include the Council's share of that growth. The Draft Plan will incorporate measures that encourage infill / brownfield development in the County.

The Draft Plan and Draft Core Strategy will identify key growth or renewal areas within the County. A Social Infrastructure Audit will be prepared for the Draft Plan that will identify community infrastructure needs within the County and at a local neighbourhood level. This will be prepared in consultation with the relevant statutory agencies and the Community Department.

In accordance with the NPF and RSES, the Draft Plan will promote strategic policies and objectives. Development Management standards and active land management measures will be included in the Draft Plan. The plan will include objectives to monitor housing supply

on brownfield / infill / regen and greenfield sites in the context of NSO 1: Compact Growth to meet the needs of the population for South Dublin.

Preparation of the Draft Plan will be informed by the most-up to date housing and employment information and guidance to ensure the needs of the population are catered for during the life of the Development Plan whilst ensuring policy to provide for the population targets set under the Regional Strategy. The Core Strategy will form the basis for policies and objectives throughout the Draft Plan.

### **Housing Delivery, Tenure and Typology**

The issues raised in relation to strategic policy, development management and implementation levels are all acknowledged. These issues will be considered as part of the preparation of the Draft Plan policies and objectives.

The NPF, RSES and Central Statistics Office all recognise that the population is living longer and the household requirements for the older population and people with disabilities need to form a part of housing need. South Dublin in 2020 published an Age Friendly County Strategy 2020 – 2024 and the policies and objectives set within the document will be reviewed as part of the preparation of the Draft Plan. The policies of the Draft Plan will aim to support and facilitate 'right-sizing' in line with RPO 5.5, RPO 9.1 and RPO 9.2, alternative housing options for older people, adaptable homes in line with Universal Design principles and prevailing guidelines promoting a more flexible household stock within each neighbourhood.

The design, layout and density of housing and apartment units will be informed by section 28 Government Guidelines, including the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), 'Sustainable Urban Housing; Design Standards for New Apartments' (2018) and 'Urban Development and Building Heights Guidelines for Planning Authorities'(2018) and RPO 9.4. Working from home will be explored during the preparation of the Draft Plan in the context of the above guidelines.

In terms of energy retrofitting and efficiency, the Draft Plan will examine policies, in line with RPO 7.40 of the RSES, to promote high levels of energy conservation, energy efficiency and the use of renewable energy sources in existing buildings, insofar as this falls within the remit of the Development Plan. The retrofitting of energy efficiency measures in the existing building stock is an operational matter for social housing within the County. All new buildings within the Region will be required to achieve the Nearly Zero-Energy Buildings (NZEB) standard in line with the Energy Performance of Buildings Directive (EPBD) and building regulations.

The Housing Strategy under Part V of the Planning and Development Act 2000 (as amended) will examine existing and likely future housing need across the County over the period of the County Development Plan and will form part of the Draft Plan.

With specific reference to housing need, and in the absence of the proposed national guidance or toolkit, it is intended to carry out a Housing Strategy (Needs Assessment) as part of the review process which will be underpinned by a robust baseline of housing needs

within the County capable of informing and guiding policies and objectives in the Draft Plan. It is intended that the assessment will include an understanding of housing typologies and tenure.

The Council will endeavour to implement the provisions of any forthcoming guidance on the matter should it be feasible within the statutory timeframe associated with the making of the County Development Plan.

### **Rural Housing**

The content of the submissions is noted and will be considered in the preparation of the Draft Plan. The current Development Plan sets out specific policies in relation to rural housing under Section 2.5.0 which were prepared having regard to the Sustainable Rural Housing Guidelines for Planning Authorities (2005).

Since the adoption of the current Development Plan, as noted in submissions, the National and Regional Planning policy context has evolved. The policies under the Draft Plan will be reviewed and have regard to the most up to date and available information under the National and Regional policy context, the Sustainable Rural Housing Guidelines for Planning Authorities (2005) and Circular Letter PL, 2/2017 relating to local needs criteria.

### **Chief Executive's Recommendations**

The recommendations below include the relevant recommendations for the neighbourhood areas as they relate to this strategic issue.

It is considered that the Draft Plan includes policies and objectives to:

- Prepare a strategic vision for the Draft Plan which aligns, as appropriate, with the Objectives of the NPF and RSES.
- Prepare an evidence-based Core Strategy, Housing Strategy and Settlement Strategy in line with the requirements of the Planning and Development Act 2000 (as amended) and consistent with the objectives of the NPF, RSES and the MASP.
- Promote the phasing of new development alongside the delivery of key pieces of required infrastructure to create sustainable communities.
- Carry out a Planning and Infrastructural Assessment in line with the provisions of Appendix 3 of the NPF which will identify enabling infrastructural needs throughout the County and facilitate a phased approach to development.
- Promote compact growth in line with the NPF and RSES through the inclusion of specific policies and targeted and measurable implementation measures that:
  - encourage infill / brownfield development and
  - focus growth on the County's designated strategic development areas.
- Ensure that policies and objectives in relation to rural housing reflect the relevant National, Regional and Ministerial Planning Guidance Documents.

- Develop climate action as a cross cutting theme through all sections of the plan in line with the provisions of section 10(2)(n) of the Act
- Support the ongoing preparation of a master plan which will guide the future sustainable development of the Naas Road area in conjunction with Dublin City Council.
- Ensure that the draft Development Plan has regard to section 28 planning guidelines and is consistent with the relevant SPPRs and national and regional objectives.

## 4.2.4 Sustainable Movement

### Chief Executive's Summary of Issues Raised

There were 120 issues raised in relation to the high-level topic of Sustainable Movement. The main issues in relation to this high-level topic are set out in the following table;

Topic	Issues Raised	% of Total
Sustainable Movement - General	25	20.8%
Walking and Cycling	40	33.3%
Car Parking	6	5%
Electrical and Gas Vehicle	6	5%
Public Transport - General	22	18.3%
Roads	19	15.2%
Airports	2	1.7%
Total	120	100%

### Sustainable Movement – General

#### National Transport Authority

The NTA submission contains a detailed set of recommendations which The Draft Plan should incorporate an evidence based Core Strategy that accords with the provision of the Planning and Development Act (as amended) and with the requirement of the NPF, the RSES and MASP for the Dublin metropolitan area and all relevant statutory guidance. The purpose of the Core Strategy is to articulate a medium to longer term quantitative and qualitative based strategy for the spatial development of the County, identifying the quantum, location and phasing of proposed development, as well as growth scenarios. The Core Strategy will form the basis for land-use and transportation policies and objectives which will be core to the plan.

- It should support an efficient and effective transport system and encourage smarter travel choices based on available options, taking account of National and Regional Policy and Guidance.
- It should seek to promote greater use of public transport, increase walking and cycling, and direct growth around existing and planned services so that the demand for travel in general and for car-based travel is reduced.

- It should seek to ensure that all development - residential, commercial, economic etc. - will comply with the guiding principles set out in the submission all of which contribute to the delivery of places in which people want to live, work and play.

In order to inform the Plan the Council is carrying out a Sustainable Movement study which will yield appropriate policies and, where identified, concrete proposals across the county which will act as a vehicle for enabling the implementation of the guiding principles set out above.

- It should seek to develop sustainable transport indicators, including mode share, for the purpose of monitoring the efficacy of policies and development objectives against a range of sustainable development indicators.

The submission also makes reference to the NTA Implementation Plan 2019-2024 published in 2019 which sets out a range of transport projects that will be delivered or commenced during the life of the Plan. It also makes reference to the need to support the rural road network and to review car parking provision in line with sustainability guidelines.

[\(SD-C147-29, MICK MAC AREE, NATIONAL TRANSPORT AUTHORITY\)](#)

### **Eastern and Midlands Regional Assembly**

The Regional Assembly welcomes the Council's commitment to integrated transport and land use and to sustainable mobility. The Assembly makes reference to RPO 8.1, which requires that the integration of transport and land use planning shall be consistent with the Guiding Principles set out in Section 8.3 of the RSES. Further reference is made to RPO's 8.16 and 8.4 which require that lands use plans within the GDA demonstrate consistency with the NTA's Transport Strategy for the Greater Dublin Area. The Assembly recommends early engagement with the transport agencies to ensure the integration of transport and land use in the South Dublin CDP and in the preparation of Local Transport Plans for selected settlements in the Region (RPO 8.6) to help achieve this mode shift.

It further welcomes the proposal to examine the current movement patterns around the County as part of the review of the Plan. In this regard it is essential for the Planning authority to promote alternatives to the private car in the County in order to meet the requirements under section 10(2)(n) of the Act. The OPR encourages the Planning authority to include modal shift targets to be achieved over the Plan period, aligned to relevant implementation and monitoring measures, in order to achieve meaningful improvements in GHG emissions and energy use. Sustainable settlement and transport strategies are promoted for urban and rural areas with measures to reduce GHG emissions, reduce energy usage and to adapt to climate change. . [\(SD-C147-31, Pauline Riordan, EMRA\)](#)

### **Office of the Planning Regulator**

The OPR recommends that the Plan commit to the proactive implementation of the 'Design Manual for Urban Roads and Streets' (as revised in 2019) in the required locations, consistent with RPO 9.10, which will also assist sustainable and active transport modes, in

addition to improvement in the street environment and overall quality of life of urban areas and settlements of all sizes.

The submission welcomes the proposal to examine the current movement patterns around the county as part of the review of the plan. In this regard it is essential for the planning authority to promote alternatives to the private car in the county in order to meet the requirements under section 10(2)(n) of the Act.

The submission also encourages the planning authority to include modal shift targets to be achieved over the plan period, aligned to relevant implementation and monitoring measures, in order to achieve meaningful improvements in GHG emissions and energy use.

Sustainable settlement and transport strategies are promoted for urban and rural areas with measures to reduce GHG emissions, reduce energy usage and to adapt to climate change.

The submission highlights the need for consultation with transport agencies including the NTA and TII, and neighbouring planning authorities, during the preparation of land use and transport plans, and to ensure that policies and development management standards regarding access to national roads including exceptional circumstances are consistent with the Spatial Planning and National Roads Guidelines (2012).

The OPR advises the Planning authority to continue to work proactively with transport agencies and Irish Water to progress projects that deliver infrastructure to support development in strategic development areas consistent with the RSES. ([SD-C147-144, Maude Ni Bhrolchain, Office of the Planning Regulator](#))

The Dublin Bus submission draws attention to the fact that new Development Plan must strike a balance between public transport provision and the ongoing need to cater for private modes of transport.

This submission goes on to say that in order to encourage modal shift from car to active travel, public transport and personal powered transports, such as e-scooters, the convenience of the private car must be challenged, to do this:

- invest in road space for sustainable modes.
- Facilitate innovations such as Account Based Ticketing (ABT) and Mobility-as-a-Service (MaaS) and other intelligent transport innovative solutions. ([SD-C147-95, Dublin Bus, Dublin Bus](#))

A significant number of issues raised supported the promotion of sustainable modes of movement within the County based on populations located in proximity to centres, compact growth and based on the density and location of employment development. A range of issues were raised including the need for an ambitious strategy which will encourage people out of their cars and onto public transport, the importance of public transport to the local economy and at community level. Submissions also highlight the need for provision of cycling and walking routes from new development connecting to places of employment, education etc., reduce car reliance, promote car-sharing, create attractive environments for people to increase user potential, and provision of adequate active travel infrastructure. One submission highlights the need for the CDP to strike a balance between public transport provision and the ongoing need to cater for private modes of transport in light of Covid 19



and draws attention to the huge improvements in public transport provision throughout the Dublin area in the last 15 years.

([SD-C147-186, Aideen O'Dochartaigh, Not Here Not Anywhere](#)); ([SD-C147-186, Aideen O'Dochartaigh, Not Here Not Anywhere](#));([SD-C147-94, ELIZABETH HICKEY](#)) ([SD-C147-74, HUGH DURKIN](#)) )

Other submissions raise the following;

The need to move away from car-based travel, support for strategic cycle and car park facilities and urges collaboration between local authorities to improve the experience of travelling through and between counties and improve quality of life.

Concerns on the impact of geographic centralisation of services making access to services difficult and notes that an accessible transport service would be welcomed.

Transport should be a focus within this CDP, with a focus on settlement nucleation to protect rural areas from an explosion of vehicle dependent, dispersed and urban-generated settlements.

Every effort must be made to encourage people out of the car and provide safe ways of walking and cycling to schools. Encourage walking and cycling for short trips by making it safe to do so with cycle parking and safe ways to cross the road provided.

([SD-C147-169, South Dublin Conservation Society, South Dublin Conservation Society](#)) ([SD-C147-150, Joe RYNN, South Dublin Children Young People Services Committee](#)) ([SD-C147-164, Joan Moore, LOKRA](#) . ([SD-C147-73, Eugene Barrett, Knocklyon Network](#))

In relation to sustainable mobility, one submission suggests the reallocation of road space across the County. A suggestion is included to outline a scheme in favour of active travel. The submission asks for dedicated cycle lanes, maintenance of bus service as well as a Traffic Management Plan for the Knocklyon area. ([SD-C147-101, Brian sherry](#))

### **Chief Executive's Opinion**

It is agreed that the Draft Plan be based on national and regional guidance including, but not exhaustive: the RSES; the Transport Strategy for the Greater Dublin Area; the National Cycle Manual; Permeability Best Practice Guide; Achieving Effective Workplace Travel Plans: Guidance for Local Authorities; Workplace Travel Plans: A Guide for Implementers; Toolkit for School Travel; Guidance Note on Area Based Transport Assessment (NTA and TII); Spatial Planning and National Roads Guidelines (2012); Design Manual for Urban Roads and Streets (as revised in 2019). It is considered that the Council should continue to work in collaboration with transport providers, and neighbouring planning authorities to seek to improve transport provision within the County and to enable people to switch to public transport and active modes of travel. The Council will continue to seek funding for active travel measures and

infrastructure to further encourage a modal shift from private transport. The draft Plan will have due regard to the relevant national and regional policy and guidance documents.

It is agreed that a modal shift from motorised vehicles to more sustainable modes of transportation including active travel (walking and cycling) and public transport will be a primary aim of the Plan. Sustainable travel will not only help to meet our targets for carbon reduction and meaningful improvements in GHG emissions, but will also help to deliver a quality and healthier environment that is capable of supporting a growing population whilst attracting business and economic growth. It is recommended that the Draft Plan includes modal shift targets to be achieved over the Plan period, aligned to relevant implementation and monitoring measures, in order to achieve meaningful improvements in GHG emissions and energy use in line with section 10(2)(n) of the Act.

The draft Plan should include measures to enhance permeability as a key means of promoting the switch to active travel.

The draft Plan will support measures which provide for rural public transport initiatives.

The draft Plan will reflect the national and regional policy drive towards compact growth, the efficient use of land and the integration of land use with transport. In this regard compact growth will form a key concept for the settlement strategy and core strategy of the draft Plan.

## **Chief Executive's Recommendation**

It is considered that that the policies and objectives of the Draft Plan:

- Support an efficient and effective transport system, promoting modal shift to public transport, walking and cycling, encouraging permeability and taking account of national and regional policy and guidance.
- Direct compact growth around existing and planned services ensuring that transport and land use are integrated to the greatest extent possible.
- Include sustainable transport indicators, including targets for mode share, to monitor the policies and objectives of the draft Plan over its lifetime.
- Carry out a sustainable movement study as part of the preparation of the draft Plan to inform objectives and policy relating to improved mobility.
- Support and facilitate the rural transport bus infrastructure in the County.

## **Walking and Cycling**

A wide range of issues relating to walking and cycling have been raised. These include the need to promote safe places to cycle and walk, seeking investment in separated/segregated cycle tracks and the need for secure bicycle parking. The need for provision of more permeability across the County for walking and cycling and the need for the development of

Active Travel Plans and maintenance of the bus service to ensure modal shift was suggested. The reallocation of road space to facilitate active transport is suggested. There are suggestions the CDP should incorporate pedestrian first planning and Active Travel first approaches which improve active travel infrastructure which will enhance the permeability of the public spaces, creating a walkable County that supports inclusive, vibrant and healthy communities. It is also suggested that the Council run 'back in the saddle' courses. The development of Traffic Management Plans is also suggested. The promotion of walking school buses in villages is also recommended, ([SD-C147-56, Paul Murphy](#)) ([SD-C147-94, ELIZABETH HICKEY](#)) ([SD-C147-156, Marian O'Donnell, Dublin Chamber](#)), ([SD-C147-101, Brian sherry](#)) ([SD-C147-106, Liam Sinclair, Green Party Tallaght](#)) ([SD-C147-187, Su Murray](#))

One submission highlighted the need to support sustainable movement and connecting people to work, education, health and amenities. Two key challenges are seen as needing to be addressed:

1. Bring people closer to work, education and the services they require.
2. Prioritisation of cross radial routes linking our three main towns and outlying villages is essential for quality of life, travelling times and economic growth.

It also suggests the acceleration of investment in and delivery of the Greater Dublin Area Cycle Network Plan.

([SD-C147-61, Peter Byrne, South Dublin Chamber](#))

The NTA indicated that the management of space in town centres should deliver a high level of priority and permeability for walking, cycling and public transport modes. The key outcome of such an approach would be town centres that are accessible, attractive, vibrant and safe, as places to work, live, shop and engage in community life. They stated that new development areas should be fully permeable for walking and cycling and the retrospective implementation of walking and cycling facilities should be undertaken where practicable in existing neighbourhoods, in order to give a competitive advantage to these modes for local trip making; ([SD-C147-29, MICK MAC AREE, NATIONAL TRANSPORT AUTHORITY](#))

A number of submissions referred specifically to cycle infrastructure in the County, noted that existing cycling infrastructure is seriously lacking or poor while other submissions had concerns about the quantum and quality of cycle lanes in the County and the safety of cyclists at junctions. The need for more dedicated cycle infrastructure especially along main roads throughout the County was noted. It was felt that safe, segregated and joined up cycling routes are required in the County in order to encourage a more sustainable pattern of transport. A number of submissions suggested the provision of grants for businesses to install safe secure bike parking, the need for better end-of-trip facilities for cyclists such as safe, dry cycle parking and showers and lockers. They also sought the provision of good cycle lanes and covered storage places for bikes. It was suggested that permeability through all estates and between estates and parks should be provided.

It was also requested that cycle lanes need to be kept free from parked cars, debris and resurfaced as required. Cycle paths are needed in order to promote safe cycling and ease traffic congestion.

The cordoned off-road approach to cycle lanes is encouraged with the need for them to be smooth and maintained regularly. It is suggested that every junction needs to be considered in terms of pedestrian, bike user and motorised vehicles. It is suggested that footrests should be installed at traffic lights for cyclists and an app developed to report potholes.

It is also noted that many of the existing cycle lanes are not maintained and have become unfit for purpose.

One submission would welcome the provision of cycling training through 'Cycle Right' due to the increased numbers using this mode of transport.

It was pointed out that cycling and walking are low impact ways of engaging with the natural heritage. There was a call for more biking and walking infrastructure across the Dublin Mountains. It was also suggested that to meet carbon targets for sustainable transport, that cycling is the quickest way to implement a modal shift but requires high quality segregated infrastructure.

Recommendation was made to insert more detailed text around improving cycle and walking routes across the county in the Transport and Mobility (TM) Policy 3 Walking and Cycling and associated provisions in the existing Plan. ([SD-C147-222, Keep Ireland Open, Keep Ireland Open](#))

Submissions also note that many of the cycling initiatives listed in the existing plan have not been completed. It is essential that funding to develop a safe, segregated cycling network is ring-fenced, if the Plan is to be realistic and achievable. A list of key cycle routes that will be completed in the timeframe of the Plan is required.

It is also noted that creating more liveable urban areas through investing in cycling will help to achieve 'Compact Growth', a key objective of the National Development Plan. High standards are required for bicycle movements in and around high-density developments to local village centres and along commuting routes to Tallaght, Sandyford and Dublin City Centre. Secure bicycle parking must be provided as a planning condition in such developments. Reallocation of some existing road space to cycling, e.g. by making some roads one-way and dedicating one lane to cycling is suggested. The need for intermodal connections between cycling and public transport with cycle connections / pedestrian routes to Luas and adequate safe bike parking at Luas / bus connectors (especially hubs with Bus Connects) is raised.

It is also suggested that the Council should produce a mobility plan for the County that prioritises active travel and public transport. This should include a network of safe, segregated cycle routes that are suitable for people of all ages (8 to 80+). Interconnectivity

on cycle routes to other Local Authority infrastructure should be provided (SDCC to Fingal, DCC and DLR). There should be an emphasis on safe cycling routes to schools, community buildings/sporting venues, shops and large areas of employment e.g. Citywest and Grange Castle.

It was put forward that cycling provides the best return on investment of all transport modes and therefore the enhancement of cycling infrastructure should form an important element of the Plan. The Plan should put in place a comprehensive network of safe, segregated, well-lit and integrated cycle infrastructure supported by secure parking and services. New cycling routes and retrofitting of existing residential, commercial and retail environments are needed. This will support climate action as transport accounts for 20% of Ireland's overall emissions with 52% of overall transport emissions coming from private cars.

It is suggested that the NTA's Greater Dublin Cycle Network Plan should be progressed further and faster under this new Plan. SDCC should comment on all proposed developments that access/egress along the proposed routes.

One submission notes that the Grand Canal Greenway and other proposed greenways need to be completed as soon as possible. The lack of progress made by SDCC to complete the Grand Canal Greenway from Grange Castle to Hazelhatch is highlighted and the Council is encouraged to prioritise this in the next County development plan.

One submission highlights the lack of temporary cycle infrastructure and lanes which were created in areas like DCC and DLR but have yet to be created within the County.

[\(SD-C147-113, John Stephens\)](#); [\(SD-C147-82, Declan Hanley\)](#); [\(SD-C147-198, Carly Bailey\)](#); [\(SD-C147-183, AIDAN doyle\)](#); [\(SD-C147-100, Olive O'Malley\)](#) ; [\(SD-C147-27, Aoife Harrington\)](#); [\(SD-C147-9, Colin Boyle\)](#); [\(SD-C147-176, Lynn Tierney, Saggart Village Residents' Association\)](#); [\(SD-C147-141, Ross O'Mullane\)](#); [\(SD-C147-96, Kieran Walsh, Public Participation Network\)](#) ; [\(SD-C147-202, Cllr Alan Hayes\)](#)[\(SD-C147-35, Muireann O'Dea O'Dea, Dublin Cycling Campaign\)](#); ( [\(SD-C147-94, ELIZABETH HICKEY\)](#) ) [SD-C147-49, Niall Charleton](#) [\(SD-C147-113, John Stephens\)](#) [\(SD-C147-35, Muireann O'Dea O'Dea, Dublin Cycling Campaign\)](#) [\(SD-C147-202, Cllr Alan Hayes\)](#); [\(SD-C147-156, Marian O'Donnell, Dublin Chamber\)](#); [\(SD-C147-56, Paul Murphy\)](#); [\(SD-C147-28, Shane O'Brien\)](#); [\(SD-C147-119, John Lahart\)](#)

### **Chief Executive's Opinion**

A modal shift from private transport to more sustainable modes of transportation, including active travel (walking and cycling) and public transport, should be a key guiding principle of the Plan. South Dublin County Council has been working closely with the NTA to prepare a Sustainable Movement Study to inform the Draft Plan. This study alongside the projects proposed in Cycle South Dublin will act as a vehicle for the delivery of active travel infrastructure and enable the delivery of the NTA's guiding principles

A number of cycle infrastructure projects have been delivered in the lifetime of the current Plan including the Dodder Greenway. However, it is acknowledged that there remain

significant opportunities to expand the existing network and related infrastructure in the short, medium and long term. In this regard the Cycle South Dublin Strategy has proposed a clear roadmap for the delivery of improved cycling infrastructure in the County and projects will be advanced over the coming months and years.

The promotion of alternatives to the private car in accordance with section 10(2)(n) of the Act alongside the provisions of RPO's 8.1 and 8.4 of the RSES should be a key theme in the Draft Plan.

Support for active travel measures and improved public transport through the delivery of cross radial routes and orbital connections should be considered having due regard to the GDA Transport Strategy.

The recommendations of the NTA to prioritise space in town centres for active travel and public transport should be reflected in the draft Plan. The need for increased permeability to ensure easy access to transport options is recognised as important if modal shift is to be encouraged.

The Council will continue to work with the relevant transport providers NTA, TII, Irish Rail and other stakeholders to develop transport systems which best serve the needs of the population they serve.

### **Chief Executive's Recommendations: Walking and Cycling**

It is considered that that the Draft Plan includes policies and objectives to:

- Promote and enable the delivery of infrastructure to increase the number of people walking and cycling.
- Direct growth around existing and planned services so that the demand for travel in general and for car-based travel is reduced.
- Work with surrounding local authorities to plan for, and support delivery of public transport and active travel modes.
- Support the delivery of the sustainable movement study and the Cycle South Dublin Strategy to promote permeable and compact communities with access to amenities, businesses, employment and retail areas and to improve mobility.
- Support the delivery of a comprehensive network for safe cycling over the lifetime of the new plan including the delivery of new projects and the upgrade of the existing network. The plan will identify where possible specific projects for delivery.
- Support delivery of infrastructure associated with cycling to enable and encourage a greater take up and comfort of cycling in the County.

- Measure and promote the carbon reducing benefits of the increased cycle network and other modal shifts.
- Incorporate requirements for Active Travel Plans and Traffic Management Plans where appropriate through the Development Management System
- Support active travel measures and improved public transport through the delivery of cross radial routes and orbital connections having due regard to the GDA Transport Strategy.

## Car Parking

Submissions requested that a balance be struck between making provisions for cars within housing developments and the encouragement of the use of public transport. It is suggested that new housing developments do not need to provide a car parking space for each house. There is support for a gradual reduction in car parking numbers to reflect a gradual modal shift to more sustainable modes of transportation and support for maximum car parking standards. A submission requested that there be an increase in specialised car parking such as for EV, disabled bays and spaces designated for hired cars to reduce car dependency. A submission calls for free parking across SDCC.

Dublin Chamber request that car parking policies should reflect the expanding public transport and sustainable mobility network, while supporting modal shift. The level of car parking space within South Dublin should be gradually reduced on a phased basis to reflect modal shift to public transport and active travel. Car parking should also be future proofed to accommodate electric vehicles. Other parking spaces should be considered for conversion to accommodate active travel options, by including bike parking, e-scooter sharing schemes, or new pedestrian spaces as appropriate.

The NTA recommends that car parking provision for non-residential developments should be subject to maximum standards. In addition, in locations where the highest intensity of development occurs, an approach that caps car parking on an area-wide basis should be applied. ([SD-C147-156, Marian O'Donnell, Dublin Chamber](#)); ([SD-C147-95, Dublin Bus, Dublin Bus](#)); ([SD-C147-198, Carly Bailey](#)); ([SD-C147-141, Ross O'Mullane](#)); ([SD-C147-29, MICK MAC AREE, NATIONAL TRANSPORT AUTHORITY](#))

## Chief Executive's Opinion

The role of car parking and its potential to generate car-based travel will need to be carefully balanced against the availability of alternative transport options. Parking provision should be based on whether or not the proposed number of spaces is justified, taking into account factors such as location, access to public transport and turnover rates. The Draft Plan will have regard to national policy, to NTA policy documents and to relevant planning guidelines which encourage a criteria-based approach to car parking provision and associated policy.

A Dublin Regional EV Charging Strategy is currently being prepared and once published within the timeframe of the draft plan will inform policy and objectives of the draft plan.

### **Chief Executive's Recommendations**

It is considered that that the policies and objectives of the Draft Plan:

- Investigate measures which adequately meet the carparking requirements for residential and non-residential development in line with national planning and transport policy requirements.
- Review and update policy in relation to wider carparking issues including shared car parking bays for electric vehicle parking, carpooling and other sustainable forms of transportation.

### **Electrical Vehicles and Gas Network Vehicles**

There was general support for electrical car charging infrastructure. A submission called for electrical car charging points to be provided in Part 8 residential developments in South Dublin and for SDCC to show leadership on this issue. It is suggested that where planning permission is sought for car parking space, they should always include electrical charge points for each car park space provided to future proof sustainable development. A submission recommends the expansion of PV solar to all new public buildings, to plan for an increase in electric vehicles, improve and expand public charging infrastructure and charging points at new homes and businesses. There was support for electric car charging stations to be integrated into all residential and commercial planning applications.

Promoting, encouraging and facilitating the use of sustainable modes and patterns of transport including electric vehicles is suggested, including parking standards that will set minimum levels of parking provision for EVs.

Gas Networks Ireland suggest that the Sustainable Movement section of the new South Dublin Development Plan includes wording to support compressed natural gas (CNG) infrastructure. This would be in line with the 'Eastern and Midland Regional Assembly Regional Spatial and Economic Strategy 2019-2031 (EMRA RSES) which supports the 'use of alternative cleaner fuels for home heating and transport including the use of Compressed Natural Gas powered commercial vehicles'.

[\(SD-C147-106, Liam Sinclair, Green Party Tallaght\)](#); [\(SD-C147-25, Thomas Gallagher\)](#); [\(\(SD-C147-94, ELIZABETH HICKEY\)\)](#); [\(SD-C147-108, Fiona O'Connor, Gas Networks Ireland\)](#); [\(SD-C147-185, Colm Cummins, Electricity Supply Board \)](#)

### **Chief Executive's Opinion**

The importance of the Dublin Regional EV Charging Strategy, currently being prepared and led by Fingal County Council with CARO and other representatives from the four Dublin Local Authorities including South Dublin County Council is acknowledged and its objectives supported. The strategy will steer the provision of electrical car charging points within the Dublin Region. Innovations where there are long term sustainable gains and supports the use



of alternative cleaner fuels for transport including the use of Compressed Natural Gas-powered commercial vehicles are supported and acknowledged.

### **Chief Executive's Recommendations**

It is considered that that policy and objectives in the Draft Plan:

- Support the forthcoming 'Dublin Regional EV Charging Strategy' and support the delivery of electrical car charging infrastructure
- Review Development Management policies in relation to the delivery of sustainable transport infrastructure in particular EV charging to support the use of cleaner fuel.

### **Public Transport**

In relation to public transport submissions refer to the need for improvements to bus and rail services across the County.

#### **Bus Service**

A number of submissions request improvements to bus services, including upgrading of the road and other infrastructure to cater for increased capacity, improved bus priority, improved network speed, improved journey times and more consistent journey times. A submission suggests that dedicated Bus Lanes should be on all major roads. Another submission promotes the conversion of buses to electric or Biofuel or some alternative energy source than carbon fuels. A submission suggests provision of short, localised bus routes and orbital routes.

Dublin Bus has made a number of observations and recommendations including that:

In the interim period between now and the completion of the BusConnects project, road space allocation should continue to favour sustainable modes of travel including public transport and bus priority measures. Increasing the number of bus shelters available across South Dublin County will also be beneficial to public transport users and building these in high population density/footfall locations should be prioritised.

While there are large Park and Ride facilities currently located in South Dublin County, specifically at Adamstown (200 vehicle capacity), Cheeverstown (312 vehicle capacity) and the Red Cow (727 vehicle capacity) further enhancement of these facilities should be examined to future proof these facilities against the rising urban population. New Park and Ride facilities should also be developed in line with the BusConnects plan to ensure this infrastructure works cohesively with the existing and planned future public transport network.

It is Dublin Bus's view that the bus network of the future must have increased capacity, improved bus priority, improved network speed, improved journey times, more consistent journey times. To achieve this, SDCC and Dublin Bus must prioritise public transport to help build a sustainable Dublin. This means:

- Implementation of BusConnects
- Expansion of Dublin Bike Scheme to South Dublin County
- Introduction (subject to regulation) of e-scooters to the public transport value chain
- Shift investment towards public transport
- Implementation of Account Based Ticketing

- Implementation of Mobility-as-a-Service
- Transition towards a zero-emission fleet
- Introduction of demand management measures
- Prioritise high density developments near high quality public transport hubs

It is suggested that all these options should be up for discussion with a view to building consensus around the options which work best for South Dublin County. The urban bus is and will continue to be by far the largest mode of public transport in our fast-growing city for decades to come. It is suggested as critical that we are ambitious and invest in our bus network so it meets the needs of people, supports economic growth and also meets our social and environmental responsibilities.

([\(SD-C147-95, DUBLIN BUS, DUBLIN BUS\)](#)); ([\(SD-C147-73, Eugene Barrett, Knocklyon Network\)](#)); ([\(SD-C147-100, Olive O'Malley\)](#)); ([\(SD-C147-106, Liam Sinclair, Green Party Tallaght\)](#))

### **Heavy and Light Rail Facilities**

Several submissions would like to see improvement in the heavy and Light-rail services and resources. It is suggested that the rail line from Kildare to Dublin is an underused resource and seeks a way of increasing the use of this service. The provision of a large car park at the new station at Kishogue defeats the purpose and suggests that the station is of little value to Clondalkin.

A number of submissions expressed support for public transport but identified the need to improve it. It was suggested that more emphasis needs to be placed on connecting to existing rail services in the County and give serious consideration to prioritising extra rail lines over roads to transport greater number of people and reduce CO2 emissions.

In relation to sustainable movement, a submission states consideration should be given to a spur off the Kildare rail line to Newcastle/Rathcoole, with park and ride facilities provided.

A submission questions why Clonburris SDZ is not a stop on the future DART line from Dublin to Celbridge.

Active engagement between SDCC and Irish Rail is encouraged on any future projects which pass stations in South Dublin. Active engagement should also take place between the TII and other public transport providers. ([\(SD-C147-64, Emma Flanagan, Cairn PLC\)](#)); ([\(SD-C147-25, Thomas Gallagher\)](#)); ([\(SD-C147-122, Proinsias Fhlannchadha\)](#)); ([\(SD-C147-113, John Stephens\)](#))

Several of the submissions would like to see improvement and extension of the light-rail services, and resources.

TII indicated that they are in the process of finalising Technical Guidelines for Development of the Light Rail Environment. Any works adjacent or interfacing with Luas infrastructure must be carried out in accordance with TII's 'Code of engineering practice for works on, near, or adjacent the Luas light rail system' available at <https://www.luas.ie/work-safety-permits.html>.

Support was expressed for Metrolink to the County connecting to Metro North and the continuation of Metrolink to South West Dublin, which it is considered will have many

benefits on the environment and population health, as well as reducing journey times in cars.

One submission suggests additions to TM1 Objectives 5 and 6 of the 2016-2022 Plan providing for support for the continuation of Metrolink to South West Dublin.

A view was expressed that existing public transport is overcrowded, inefficient and unreliable while another submission stated that public transport must be improved as an option and combined with carpools and cycle garages. It was suggested that public transport capacity needs to be examined on buses and the Luas, especially in light of Covid-19 social-distancing restrictions.

A submission called for improvement to the public transport network, expansion of the light rail system, the Luas from Saggart to Hazelhatch, the Luas into Dun Laoghaire-Rathdown area, and to provide Metro South and Dublin South West rail.

[\(SD-C147-171, Pauline Foster, Records Residents Association\)](#) . [\(SD-C147-172, John Lahart\)](#) [\(SD-C147-55, Sean Ward\)](#) [\(SD-C147-36, Michael McCormack, Transport Infrastructure Ireland\)](#) [\(SD-C147-106, Liam Sinclair, Green Party Tallaght\)](#)

### **Chief Executive's Opinion**

The range of issues raised in relation to public transport infrastructure including, bus, heavy and light rail are noted. while the local authority is not directly responsible for the provision or delivery of public transport the Council will continue to support improvements to the existing network and the principle of planned new networks in the County work in collaboration with the relevant transport providers, including Dublin Bus, NTA, TII and Iarnrod Éireann to provide the best service possible and ensure that investment in the infrastructure is protected and capitalised upon to the advantage of the population of the County.

It is noted that the NTA are investigating the viability of a number of measures to reduce the need for car based movements within towns and cities including strategic Park and Ride measures with may be provided in conjunction with bus and rail.

It is noted that detailed research and analysis is currently ongoing as part of the preparation of the draft Plan between South Dublin and the NTA to identify infrastructural and policy measures that will contribute towards a modal shift towards public transport across the County and to adjoining areas.

### **Chief Executive's Recommendations**

The recommendations below include the relevant recommendations for the neighbourhood areas as they relate to this strategic issue.

It is considered that that the Draft Plan includes policy and objectives that:

Public Transport: General

- Support the delivery and improvement of public transport infrastructure and services across the County including BusConnects, rail and LUAS in terms of connections, capacity and efficiency in line with national and regional policy.
- Seek an increased modal shift onto Public Transport by supporting the delivery of new and improved public transport in line with the County's settlement strategy.
- Support new and improved public transport orbital routes; routes across the County; and connections into surrounding counties in line with the GDA Transport Strategy and national and regional policy.
- Facilitate rural transport services that provide for social and economic connectivity between small villages/rural areas and larger towns within the County and support the delivery and enhancement of the NTA's Local Link Rural Transport Programme.

#### Heavy and Light Rail

- Support the use and improvement of the heavy-rail network within the County to provide a much-improved public transport offering and to support the principle of compact growth and integrated transport and land use planning alongside this.
- Support the use and improvement, in collaboration with the NTA and TII, of the light rail network within the County to provide a much-improved public transport offering and to support the principle of compact growth and integrated transport and land use planning alongside this.

#### Roads

A wide range of issues were raised in relation to roads in the County.

TII request that the protection of the safety, carrying capacity and efficiency of the existing/future national roads network and Luas network is maintained:

- That the County Development Plan reflects the provisions of official policy (Project Ireland 2040: National Planning Framework and National Development Plan, 2018 - 2027, Smarter Travel (DTTAS, 2009), (SFILT) Investing in our Transport Future (DTTAS, 2015), the provisions of the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012), and the Eastern and Midland Regional Assembly Regional Spatial and Economic Strategy (EMRA RSES)) and national objectives in relation to spatial planning, national roads and Luas.
- That SDCC policies and objectives are developed to ensure that the carrying capacity, operational efficiency, safety and national investment made in national roads is safeguarded.
- That the Council consider the implications of land use policies on the strategic national road network in the area as a criterion in determining the future land use zoning strategy to be outlined in the Draft Development Plan and the respective Core Strategy.

- An integrated approach to land use and transportation solutions throughout the County should be undertaken such that local traffic generated by developments is catered for primarily within the framework of the local (i.e. non-national) road network.
- Local development contributions schemes to be used to pay for the costs of accommodation of local development proposals connecting to the national roads. Any additional connectivity to national roads should be developed in accordance with the requirements of Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012).
- That the strategic transport function of national roads and associated junctions should be maintained and protected in statutory land use plans.
- there is a requirement to carefully consider a review of existing development plan policies related to local roads adjacent to national roads taking account of Section 28 Guidance Spatial Planning and National Roads Guidelines for Planning Authorities
- An integrated approach to the design of development areas should include a set of principles and criteria designed to ensure a high standard of access by public transport, foot and private car. ([SD-C147-36, Michael McCormack, Transport Infrastructure Ireland](#))

In order to protect the strategic transport function of the national roads, including motorways, the NTA recommends that any development objectives should be in accordance with the DOECLG Spatial Planning and National Roads Guidelines (2012), and that this should be referenced in the Development Plan. National Strategic Outcome 2 of the National Planning Framework indicates the need for 'Maintaining the strategic capacity and safety of the national roads network including planning for future capacity enhancements'. ([SD-C147-29, MICK MAC AREE, NATIONAL TRANSPORT AUTHORITY](#))

The OPR indicates that a key issue for the next development plan is to ensure that policies protect the strategic function of national roads, maximise the benefits of existing and planned public transport investment and that local policies and development management standards regarding access to national roads including exceptional circumstances are consistent with the Spatial Planning and National Road Guidelines (2012). ([SD-C147-144, Maude Ni Bhrolchain, Office of the Planning Regulator](#))

A submission called for the new Development Plan to strike a balance between public transport provision and the ongoing need to cater for private modes of transport. Good quality road provision will ensure the economy and residents' access to services is crucial. Another submission indicated that the new Development Plan should provide greater certainty to private landowners affected by major infrastructure proposals, such as long-term road objective relates to the N81 Hollywood Cross to Tallaght Road Improvement Scheme where there remains no certainty about delivery timescales or whether the road scheme will ultimately come forward. These infrastructure proposals can place significant restrictions on the ability of landowners to invest in their properties and land. They also create significant uncertainty on landowners in respect of potential compulsory purchase and major works that could be undertaken on their lands.

A number of submissions made suggestions for improvements including more soundproofing along the M50, possibly using recycled plastic to create barriers. Calls for

better and more consistent speed bump design and provision. Remove pedestrian railings at junctions and have consistency in the layout of junctions and plan for infrastructure related to automated electric vehicles now. ([SD-C147-141, Ross O'Mullane](#)) ([SD-C147-75, Hugh Durkin Nigel Smith](#))

There were a number of submissions which sought specific improvements or infrastructure as follows:

Calls for SDCC to consider providing a second slip road off the R120 at Commercial Hurling Club to connect with the N7 heading south bound to allow traffic leaving Newcastle and Greenogue access the N7 directly without the need to stop at the roundabout. The Western Dublin Orbital Route, as indicated in the current Plan, by-passing Newcastle village or similar alternative route, would benefit and enhance the wellbeing of residents in Newcastle, which have seen an increase in the volume of traffic through its village year on year over the last decade.

The provision of the Western Dublin Orbital Route (North) is requested from the proposed separation junction on the N7 at Tootenhill west of Rathcoole to Leixlip Village on the N4 prior to further development taking place within Newcastle.

The provision of a ring road to be built around Newcastle soon is requested to prevent accidents. In the interim SDCC is asked to consider an outright HGV ban, a HGV ban at certain times or increased traffic calming measures.

A call for improved traffic lights coordination at major junctions serving the Clonburris SDZ lands including at the T junction into Grange Castle near Milltown on the old Nangor Road are causing traffic tailbacks and pollution.

A submission refers to specific Roads and Transportation proposals at Colmanstown Lane which are put forward to address difficulties currently encountered by landowners with agricultural and residential properties. It is considered that the Plan needs to consider the Trans T Network proposal to further upgrade the N7 National Route to one level below Motorway standard which will require upgrades to existing at grade junctions. The submissions puts forward proposals aimed at addressing existing access issues onto the N7 in this area.

Traffic and congestion issues in relation to a number of specific areas is also raised. Traffic congestion possibly affecting public health in Rathcoole, congestion on the ) Bohernabreena Road and Kiltipper Park where it is felt development should be planned in 'integrated manner', need for additional pedestrian crossings along the Ballymount Road Upper and the need for a Grade Separated junction between R148 and Kennelsfort Road. Traffic issues in the Rathcoole/Saggart /Citywest neighbourhood areas were also raised.

([SD-C147-11, Asa holmstrom holmstrom](#)) ([SD-C147-25, Thomas Gallagher](#)) ([SD-C147-54, Fergal Britton, ReNewcastle Community Group](#)) ([SD-C147-105, James McNerney, James McNerney Planning Consultant](#)) ([SD-C147-85, Eugene Wisely](#)) ([SD-C147-4, Donal Pat Cleary](#)) ([SD-C147-24, Niamh Stephens](#)) ([SD-C147-214, David Kennedy](#)) ,([SD-C147-213, Shane Moynihan](#)), ([SD-C147-206, Patrick Healy](#)).

## Chief Executive's Opinion

Issues raised in relation to roads are acknowledged. The Council will continue to upgrade road infrastructure where necessary and where resources allow to make South Dublin a safer place to travel and move around.

The Council follows the DOECLG Spatial Planning and National Roads Guidelines (2012), with National Strategic Outcome 2 of the National Planning Framework indicating the need for *'Maintaining the strategic capacity and safety of the national roads network including planning for future capacity enhancements'*. In this regard the compact growth model basing population growth along transport corridors is a key element of planning policy.

The Draft Plan will support the provisions of *'The NPF: Project 2040', Transport Strategy for Greater Dublin Area 2014-2035, National Development Plan 2018-2027, Smarter Travel-A Sustainable Transport Future 2009-2020, Investing in our Transport Future (DTTAS, 2015), The Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012)* and the *EMRA RSES* in relation to the delivery of transport, including the road needs in the county.

SDCC will review all policy and objectives in relation to local roads as stated within Section 28 Guidance Spatial Planning and National Roads Guidelines for Planning Authorities.

Other comments have been noted and will be considered during the Draft Plan stage.

## Chief Executive's Recommendations

The recommendations below include the relevant recommendations for the neighbourhood areas as they relate to this strategic issue.

It is considered that that the Draft Plan includes policies and objectives that:

- Seek to implement the provision of the Design Manual for Urban Roads and Streets (as updated) in relation to the delivery of safe streets and overall best practice design and promote the principle of filtered permeability.
- Support measures that will help to manage road traffic across the County
- Ensure that transport policies align with the objectives of Project Ireland 2040: National Planning Framework and National Development Plan, 2018 - 2027, Smarter Travel (DTTAS, 2009), (SFILT) Investing in our Transport Future (DTTAS, 2015), the provisions of the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012), and the Eastern and Midland Regional Assembly Regional Spatial and Economic Strategy (EMRA RSES).
- Investigate the need for road infrastructure where it is required to support the delivery of compact growth

## **Airports**

The DAA has made observations regarding the Obstacle Limitation Surface (OLS) asking that any proposals which exceed 90m above ground level and which lie within the 15km safety zone are referred to the DAA. They have also recommended that any development proposals at Weston Airport with potential impact on the safe operation of Dublin Airport are referred to the DAA and the IAA for comment. Also, in relation to the area of Glint and Glare, it is recommended that SDCC refer any proposals for solar farms within 15km of Dublin Airport to the IAA and DAA. ([SD-C147-121, Louise Byrne, DAA](#))

A request was made that consideration to development within inner approach areas and public safety zones be given within the Development Plan review. Such development should be subject to an aviation safety assessment to ensure it is appropriate. Facilitating such development would assist in delivering on a number of objectives to provide for compact sustainable urban growth within existing built up areas by providing for appropriate development within such zones, examples of other jurisdictions provision were submitted. It was requested that consideration be given to the maximisation of land use within urban areas including lands with constraints such as Inner Approach Area and public safety zone designations. A broad variety of employment should be provided, including expansion of existing commercial businesses to ensure their long-term viability, or new employment uses adjacent to existing ones. ([SD-C147-135, Andrew Boland, NVD Limited](#))

## **Chief Executive's Opinion**

It is considered that that in collaboration with the DAA and IAA existing policies and objectives be reviewed to ensure continued support for the operational requirements of each of the airports/aerodromes located within the County. Issues relating to Obstacle Limitation Surface (OLS), the 15km safety zone, Inner Approach Area, Glint and Glare, public safety zone designations and land uses in proximity to these areas, will be investigated in collaboration with the relevant aviation bodies and will be considered in the formulation of policies and objectives.

## **Chief Executive's Recommendation**

It is considered that that the Draft Plan includes policy and objectives that:

- Review and support the safety requirements of each of the airports/aerodromes located within the County and ensure that a balanced approach is taken to aircraft noise management in line with the recommendations of the International Civil Aviation Organization (ICAO).



## 4.2.5 Community Services

### Summary of Issues Arising

There were 55 issues raised in relation to the strategic issue theme Community Services. The main issues raised are highlighted in the following table.

#### Community Services:

Topic: Community Services	Issues Raised	% of Total
Community Centres and Facilities	18	32.7%
Delivery	15	27.3%
Education	3	5.5%
Parks and open space	13	23.6%
Social Inclusion	6	10.9%
Total	55	100%

#### Community Centres and Facilities

Several submissions call for the review of council funded community centres to ensure that they are offering a wide range of activities for all age groups. A need for more investment and financial support is called for in youth centres/neighbourhood centres and community centres some of which offer after school and weekend youth programmes and facilities for all community groups. The provision of meeting cafes, public seating and public toilets and men/women sheds throughout the county should also be considered.

Concerns are also raised that parts of the County comprise some of the most disadvantaged communities in Ireland where community development/facilities should be enhanced and prioritised in these areas alongside other key infrastructure. ([SD-C147-56, Paul Murphy](#)) ([SD-C147-134, Teresa Costello](#)) ([SD-C147-128, John Lahart](#)).([SD-C147-147, SDCSP](#) [SD-C147-202, Cllr Alan Hayes](#)) ([SD-C147-61, South Dublin Chamber](#)) ([SD-C147-202, Cllr Alan Hayes](#)) ([SD-C147-198, Carly Bailey](#)) ([SD-C147-128, John Lahart](#))

Several submissions have requested increased provision of leisure and leisure centres throughout the county, with pitches, swimming pools, training facilities and angling amenities. It is also suggested that the concept of outdoor swimming pools should be investigated. ([SD-C147-94, Elizabeth Hickey](#)) ([SD-C147-106, Green Party Tallaght](#)) ([SD-C147-198, Carly Bailey](#)) ([SD-C147-205, Fergal Scully](#)) ([SD-C147-128, John Lahart](#)) ([SD-C147-197, South Dublin Environmental Network](#))

Other submissions have called for an enhancement of existing library services and that the Draft Plan should ensure full implementation of the 'Our Public Libraries 2022' Strategy and successor strategies. ([SD-C147-106, Green Party Tallaght](#)) ([SD-C147-94, Elizabeth Hickey](#))

The need for adequate childcare provision in appropriate locations, near schools, villages/towns and transport routes and ensure that the development of sports amenities is in line with housing development throughout the county is also highlighted. ([SD-C147-106, Green Party Tallaght](#)) ([SD-C147-214, David Kennedy](#))

Further submissions welcome support for the Arts, including art installations, pop-up festivals, additional small theatre spaces while proposing that each town should have its own flagship cultural amenity. ([SD-C147-198, Carly Bailey](#)) ([SD-C147-106, Green Party Tallaght](#))

A submission from Dublin Chamber requests that the integration and consideration of community needs are included in planning conditions and zoning. It further suggests the consideration of partnerships between industry and communities to develop mixed-use spaces. ([SD-C147-156, Dublin Chamber](#))

A submission suggests that allotments should be prioritised for apartment residents and that the Council should explore opportunities for 'Grow Your Own' initiatives in communities on public owned lands ([SD-C147-94, Elizabeth Hickey](#))

A further submission requests the council consider the provision of planning policies that support development of a number of uses on Coillte lands including use for community and recreational purposes. ([SD-C147-53, Coillte](#))

A further submission outlines that significant improvements in the angling amenities of South Dublin County are required. ([SD-C147-205, Fergal Scully](#))

## **Delivery**

A submission highlights that if community facilities are required to close or are not accessible, it is essential that the service they provide can be delivered in an innovative way. Further submissions highlight the need for publicly funded community facilities funded by development levies within the County with a particular reference to Tallaght, Citywest and the Ballycullen Areas while concerns are also raised that the level of growth in the County has not been or will not be met with a commensurate level of community infrastructure provision to serve the existing and future populations. Specific reference is also made here to the areas of Knocklyon, Ballycullen, Scholarstown, Firhouse and Tallaght. ([SD-C147-75, Hugh Durkin Nigel Smith](#)) ([SD-C147-97, BOC Gases](#)) ([SD-C147-128, John Lahart](#)) ([SD-C147-106, Green Party Tallaght](#))

The need for the establishment of a meeting framework with relevant representatives and multi-disciplinary team of senior decision makers within the council is highlighted in order to develop a 'County Sports Plan' in line with the 'National Sports Policy 2018-2027'. ([SD-C147-147, SDCSP](#))

Several submissions have raised concerns that community and voluntary groups are experiencing huge insurance costs and would like to see a provision made for group insurance schemes for low risk activities; that financial supports should be targeted to disadvantaged areas suffering from deprivation, and that the new plan should address

'barriers to access', namely transport and its associated costs, long waiting lists for mental health and disability services. It is further outlined that there are gaps in service provision for young people relating to addiction, mental health, education options, disability services and lack of supports. ([SD-C147-96, Public Participation Network](#)) ([SD-C147-150, South Dublin Children Young People Services Committee](#))

## **Education**

The submission from the Department of Education and Skills (DES) identifies that the Development Plan should include policy and objectives which support the provision of new schools, while protecting what already exists. The submission "welcomes the positive and proactive interaction with officials in SDCC to date in respect of this Development Plan, as well as school accommodation matters generally". The submission calls for a specific community and infrastructure land use zoning objective; that sites identified by the DES for school provision are explicitly supported through appropriate zoning and /or specific local objectives (SLOs) in the Plan; that consideration should be given to education development zonings adjacent to established schools to allow for future expansion; that schools should be located in built-up areas with the associated population to achieve compact growth; that zoned lands should be flexible to allow for the development of schools and that consideration is given to potential synergies with adjacent facilities in the siting of schools. It is further outlined that revised guidelines for schools will be published by DES in 2020. ([SD-C147-116, Department of Education & Skills](#))

## **Parks and Open Space**

A number of submissions seek to protect existing public green spaces, parks playing pitches and playparks, given the projected increases in population and the construction of smaller sized residential units.

A call for improved accessibility for all within parks and open spaces was made, including the provision of; multi-generational destination parks with the use of 'Crosbie gates' for accessibility purposes, park facilities for all age cohorts within the county, sensory and play trails for people with disabilities and associated signage, designated play times, sensory units and accessible changing rooms. ([SD-C147-83, Geraldine Kelly](#)) ([SD-C147-96, Public Participation Network](#)) ([SD-C147-198, Carly Bailey](#))

Further submissions highlight the need for existing recreational assets, both public and private within South Dublin to be maximised while calls were also made for adequate car parking provision at all parks. ([SD-C147-197, South Dublin Environmental Network](#)) ([SD-C147-106, Green Party Tallaght](#)) ([SD-C147-173, Pamela Kearns](#))

A submission seeks well-designed, accessible, high quality, well maintained active recreational facilities, both outdoor and indoor, to accommodate all clubs which form part of the GAA and the maximisation of the use of South Dublin's existing recreational assets, both public and private. ([SD-C147-112, Cumann Luthcleas Gael Coiste Átha Cliath, Jim Brogan Planning and Development Consultant](#))

A submission calls for a minimum of 2 hectares per 1,000 population of open space be provided in accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) with particular reference to the area of Newcastle. ([SD-C147-85, Eugene Wisely](#))

## **Social Inclusion**

The Regional Assembly welcomes the recognition of the need to promote social inclusion and create sustainable communities in line with the principle of Healthy Placemaking which underpins the RSES. The submission makes further reference to regional policy objectives (RPO's) for healthy placemaking set out in section 9.4 of the RSES with particularly reference to RPO's 9.12, 9.14 and 9.17.

The Assembly notes that the South Dublin LECP will require review in light of the adoption of the RSES, also noting the statutory role of the Regional Assemblies in the LECP process in ensuring consistency between the LECP, the development plan and the RSES. Also, welcomed is the stated intention to carry out social infrastructure assessments where required to inform the planning of future sustainable communities. ([SD-C147-31, EMRA](#))

A further submission relates to the growing population of South Dublin and a need to ensure access and provision to services for families, young people, early years, education, health and recreation. The provision of these services will support and enhance services relating to mental health, drug & alcohol, disability and allow for the implementation of the 'Healthy Ireland Strategy'. In this regard the Public Participation Network makes reference to the results of a community wellbeing survey while another submission highlights the benefits of angling to mental health and well-being. ([SD-C147-150, South Dublin Children Young People Services Committee](#)) ([SD-C147-205, Fergal Scully](#)) ([SD-C147-96, Public Participation Network](#)) ([SD-C147-150, South Dublin Children Young People Services Committee](#))

## **Chief Executive's Opinion**

Provisions within the current development plan (2016 – 2022) namely Policy C1 and C1 objective 2 seek to ensure all communities have access to multi-functional community centres that provide a focal point for community activities while supporting the provision of a network of community centres across the county that can function as multifunctional, active and vibrant community hubs.

Points raised regarding the service and facility requirements in more disadvantaged areas of the County are also noted.

There are a wide range of community facilities and civic amenities in existence throughout the county. The current county development plan contains policies and objectives to support sporting facilities, to continue to provide community focused public libraries, facilitate the development of arts and culture within the county and to support and facilitate the provision of accessible childcare facilities in suitable locations. It is also

relevant that the Corporate Plan actively supports the Healthy Ireland goals (national health policy goals) where health and well-being are valued and supported at every level of society through the Council's work in inclusion, arts, cultural and recreational activities, library services, employment creation and enterprise support, housing supply, community, sports and leisure services and facilities.

While the Local Economic and Community Plan (LECP), will have a more significant role in terms of identifying investment to deliver infrastructure and community facilities at a local level the Draft Development Plan will be required to ensure appropriate provisions are in place to facilitate the delivery of such community facilities.

Community Infrastructure is an important part of fostering sustainable communities and delivering successful places and spaces. The current plan supports the provision of a wide range of community facilities throughout the County and boasts a suite of policies and objectives in addition to those contained within the Local Economic and Community Plan 2016-2021.

The Draft Plan will build upon the policies contained within the current plan and will be informed by a Social Infrastructure Assessment (SIA) currently being prepared as part of the plan review process. The SIA will assist in identifying existing and future community needs and inform policy provision within the plan.

Allotment uses are 'open for consideration' on lands with zoning objectives: RES, RES-N, REGEN, TC, DC, VC, MRC, LC, EE, HA-LV within the current plan. Prioritising allotments for apartment dwellers are not a County Development Plan issue. This is an operational/management issue. A Parks and Open Space Strategy is being prepared and allotments and 'Grow Your Own' initiatives will be considered as part of this.

With specific reference to the use of Coillte owned lands the Council will continue to engage with such agencies with the aim of facilitating suitable lands for community and recreational purposes.

Calls for more innovative measures to ensure the delivery of community infrastructure and facilities commensurate with new development are noted. As detailed above a Social Infrastructure Assessment (SIA) is being prepared as part of the plan review process. The SIA will assist in identifying existing and future community needs and inform policy provision within the plan at an early stage in order to ensure new development is accompanied by required community infrastructure.

Submissions regarding the use of development levies to provide funding and support for new community facilities including cultural facilities in all areas but specifically targeting more disadvantaged areas within the County are noted. The highlighted need for existing community facilities to be upgraded is noted. These existing facilities are managed by the Community Section of the Council on an on-going basis as funding allows.

The content of the submissions regarding insurance costs, access to mental health, disability services and the establishment of a multi-disciplinary team to develop the County Sports

Plan are noted, however these issues in themselves do not fall within the direct remit of a County Development Plan. The Development Plan can consider the issues of physical access to services and parameters around their general location

The submission regarding the need for improved angling amenities is noted and where a watercourse is within the ownership of the Council consideration of angling as an amenity can be considered, however this is an operational matter for SDCC Parks and Public Realm.

The Council welcomes the submission from the DES. Current policy provision requires the Council “to work in conjunction with the relevant education authorities to promote and support the provision of primary and post-primary schools in the County” and to “engage with the Department of Education and Skills and to support the Department’s School Building Programme by actively identifying sites for primary and post-primary schools at suitable locations, based on forecast needs”. This engagement has been on-going and will continue as part of the preparation of the development plan and school delivery.

In achieving compact growth, national and regional policy objectives require the provision of appropriate supporting community and social infrastructure, including good access to education. RPO 9.21 in the RSES states that “where significant new housing is proposed, an assessment of need regarding schools provision should be carried out in collaboration with the Department of Education and Skills and statutory plans shall designate new school sites at accessible, pedestrian, cycle and public transport friendly locations”. As indicated above, the Council will continue to work with the DES to facilitate the provision of schools.

The Council welcome the future publication of new revised guidelines for schools.

It is worth noting that the current plan includes objectives which (C9 Objective 7) aim “to promote and support schemes that facilitate the shared use of sufficient school facilities, particularly at planning stage, such as sports halls, ball courts and all weather pitches for community use outside of school hours and support the co-location of pre and after school childcare facilities on new primary school developments”. It is considered that such policy provision facilitates and promotes potential synergies between schools and other complementary uses of a school site outside of school hours that may benefit the wider community.

The Chief Executive acknowledges the issues raised in regard to parks and open space and points to the substantial network of parks and open spaces within the county which fall within an open space hierarchy of managed parks ranging from regional parks to smaller open spaces within residential areas, all with a range of amenities such as sports pitches, playgrounds, running tracks, teen and other spaces and natural amenities. The submission is noted regarding the provision of multi-generational parks with facilities for people with disabilities.

In this regard a Parks and Open Space Strategy is currently being prepared to inform the Draft Plan. This strategy will review the current policy within the development plan, the designation, role and function of existing parks within the county alongside opportunities for connections between and through such spaces. The provision of this strategy will inform

the policies and provisions of the Draft Plan and will be used to inform the relevant elements of the Green Infrastructure Strategy being prepared as an integral part of the draft plan.

The protection and enhancement of the places and spaces within the county is critical to the promotion of wellbeing and quality of life that comes from the interaction of people and their environment. Inclusive communities with access to education, health services for all ages, abilities and backgrounds alongside an attractive public realm, access to good sustainable transport options and designs, access to recreational amenities and open spaces all contribute towards positive social inclusion. The creation of sustainable communities and healthy placemaking within the County will form an overarching theme within the Draft Plan in line with the provisions of National Policy namely NPO26 and the provisions of the RSES set out under RPO's 9.2, 9.12, 9.14 and 9.17.

Gaps in social infrastructure will be identified as part of the preparation of the draft development plan. However, the specific submission regarding gaps in services relating to addiction, mental health, justice services, disability services and the lack of supports are a matter for the particular service provider concerned. The development plan will seek to support the delivery of these services through appropriate spatial policies.

It is confirmed that social inclusion will continue to be supported in line with the Council's Corporate Plan and national and regional policy.

## **Chief Executive's Recommendations**

The recommendations below include the relevant recommendations for the neighbourhood areas as they relate to this strategic issue.

It is considered that that policies and objectives in the Draft Plan:

- Support policies and objectives that protect and enhance existing community resources and support the development and expansion of new facilities and services in proximity to the populations they serve where their need is identified, and resources allow
- Consider the inclusion of new infrastructure projects, including parks and open spaces, in the Development Plan and their inclusion into any revised development contribution scheme subject to the necessary statutory processes
- Prepare a Social Infrastructure Audit which will inform policy on infrastructure provision within the County
- Support and promote social inclusion in line with the Council's Corporate Plan and national and regional policy

- Continue to work in collaboration with the Department of Education on all matters relating to the identification of suitable sites and the Department’s delivery of new and extended schools and supporting facilities within the County.
- Recognise the diverse and key roles that parks and open spaces have for sustainable communities and healthy placemaking and incorporate appropriate policies and objectives in the draft development plan informed by the Parks and Open Space and Green Infrastructure Strategies.
- Promote healthy placemaking as an overarching consideration in the preparation of the Development Plan, promoting accessibility and social inclusion



## 4.2.6 Economic Development

### Summary of Issues Arising

There were 43 issues raised in relation to the high-level topic Economic Development and Employment representing 5.2% of total submissions received. The main issues in relation to this high-level topic are set out in the following table.

Topic: Economic Development & Employment	Issues Raised	% of Total
Employment/Industry	21	48.8%
Town Centres and Retail	7	16.3%
Tourism	13	30.2%
Quarries	2	4.7%
Total	43	100%

### Employment/Industry

A number of submissions dealt with a review in the EE zoning category, asking for more flexibility within the zoning category (i.e. allow for more developments to happen on EE lands). Suggests adding additional zonings for employment E1: to provide for enterprise and employment related uses (to encourage mixed/ office uses) and another E2: to provide for industrial and employment (to facilitate industrial estates).([SD-C147-2](#), [Proinsias Fhlannchadha](#), [SD-C147-170](#), [Daragh Cagney](#), [SD-C147-138](#), [Rohan Holdings Ltd.](#))

A number of submissions highlighted changes in traditional work patterns particularly arising from Covid-19. This relates to changes to traditional office buildings to smaller employment hubs throughout the county, as well as working from home. The idea of creating enterprise/digital hubs throughout the county has also been identified. Develop local employment areas. The need to create conditions to attract internationally mobile investment and opportunities for indigenous enterprise growth was highlighted. ([SD-C147-106](#), [Green Party Tallaght](#), [SD-C147-138](#), [Rohan Holdings Ltd.](#), [SD-C147-2](#), [Proinsias Fhlannchadha](#), [SD-C147-96](#), [Public Participation Network](#), [SD-C147-187](#), [Su Murray](#), [SD-C147-75](#), [Hugh Durkin Nigel Smith](#))

One submission related to the economic opportunity of hosting concerts at Tymon Park or other parks in the county, as a future investment opportunity within the county. ([SD-C147-198](#), [Carly Bailey](#))

One submission highlighted the importance of Citywest, Saggart, Rathcoole and Newcastle as new development areas in the county with Kingswood and Baldonnell having potential as new economic growth centres in the county, with policy changes requested to encourage economic growth. A submission also raised the potential for Clondalkin Industrial estate for

regeneration, this has been dealt with under the heading of compact growth. ([SD-C147-179, Development 8](#))

Further submissions emphasise the need for a balanced approach to the future development of regeneration lands in a manner which provides for a mix of housing and employment uses and avoids unnecessary displacement of established economic engines within these areas. ([SD-C147-200, Tallaght Community Council](#)), ([SD-C147-97, BOC Gases](#))

An Post raised the issue of their future development throughout the county, with access to sites and car parking required throughout the lifetime of the plan. ([SD-C147-62, Muirenn Duffy](#)).

Other submissions dealt with the abolishing of commercial rates throughout the county. Another dealt with the number of data centres in the county, stating that permission should not be granted any further for these developments due to scarcity in land. Another submission deals with the creation of a SDCC social events app to advertise social events throughout the county. ([SD-C147-56, Paul Murphy](#), [SD-C147-198, Carly Bailey](#), [SD-C147-96, Public Participation Network](#))

The submission from the OPR notes the quantum of land zoned EE including remaining undeveloped land and welcomes the proposed review of employment lands. The submission draws the councils attention to guiding principles for the location of strategic employment and investment prioritisation and the guiding principles for the location of trip intensive developments in sections 6.3 and 8.3 of the RSES respectively and advises that the review should also consider the requirements for lower density employment uses. ([SD-C147-144, Office of the Planning Regulator](#))

The potential to re-intensify older industrial estates such as Naas Road/Ballymount, brownfield lands in Tallaght/Cookstown and to provide for high tech and research and development employment at Grangecastle which are identified as strategic employment locations in the RSES ([SD-C147-144, Office of the Planning Regulator](#))

The OPR encourages the planning authority to continue its engagement with Dublin City Council, the National Transport Authority and other key stakeholders such as the IDA in developing its economic and employment strategy for the forthcoming plan with particular reference to the Naas Road corridor. ([SD-C147-144, Office of the Planning Regulator](#))

EMRA raised the point that economic opportunity for all is one of the three key principles of the RSES, which sets out for the first time in Irish planning an economic strategy that is intrinsic to a regional spatial plan. It states further that the Draft Plan should refer to Chapter 6 of the RSES as well as Section 8.3 Integration of Transport and Land use in the RSES. ([SD-C147-31, EMRA](#))

The completion of Clonburris/Adamstown SDZ's, the N7 development plan and Tallaght LAP are important anchors for economic growth, as well as having appropriate lands zoned for commercial and industrial uses. ([SD-C147-61, South Dublin Chamber](#)).

The growth of third-level education, multi-use buildings (due to covid-19, development of transport hubs and increasing medical and office provision in Tallaght should all be provided for in the Plan. ([SD-C147-61, South Dublin Chamber](#))

### **Town Centres and Retail**

A number of submissions deal with retailing, asking for more flexibility to be introduced in retailing throughout the county allowing for a wider and more diverse range of retail formats. This relates to the creation of units in areas which can adapt and compete. Particular reference to Fonthill Retail Park. ([SD-C147-152, Fonthill Commercial Developments Ltd, SD-C147-156, Dublin Chamber, SD-C147-152, John Spain Associates](#) )

The importance of retail areas throughout the county are identified, highlighting the importance of the Retail Hierarchy for the Region. Welcomes proposal for an updated retail strategy for the East Region. Highlights the need to support convenience sector, provide greater flexibility within zonings to allow more convenience outlets. Requests appropriate floorplates, car parking and servicing access be provided. ([SD-C147-152, John Spain Associates](#) , [SD-C147-60, Muirenn Duffy](#))

Submission highlights the need for regeneration of town centres and urban hubs throughout the county. It is noted that these can be facilitated throughout the county in town centres and village centres. This may lead to the development of high-quality public realm design from which urban hubs can be created. ([SD-C147-156, Dublin Chamber](#))

Other submissions relate to the positives of out of centre/retail warehousing throughout the county. Retail zoning should be more flexible so that there should be no need for 'not permitted' development. Out of centre retail centres should be encouraged (works well during Covid-19). The protection of delivery and access routes throughout the county is requested for all retail, especially supermarkets. ([SD-C147-60, Muirenn Duffy](#)[SD-C147-60, Muirenn Duffy, SD-C147-64, Cairn PLC, SD-C147-170, Daragh Cagney](#))

EMRA recommends that the level of retail provision in the County be consistent with the retail hierarchy for the region as set out in Table 6.1 of the RSES. The Assembly also recognise the need for a new retail strategy for the region. The submission makes further reference to town centre renewal and RPOs 6.12-6.14 which support placemaking and the revitalisation of urban centres. ([SD-C147-31, EMRA](#))

The OPR notes that EMRA will support and drive the preparation of a new retail strategy for the region under the requirements of the *Retail Planning Guidelines for Planning Authorities (2012)*, and that RPO 6.11 requires the future provision of significant retail development to be consistent with the aforementioned guidelines, and retail hierarchy at table 6.1 of the RSES until such time as this hierarchy is updated. ([SD-C147-144, Office of the Planning Regulator](#))

### **Tourism**

A number of submissions relate to the provision of different tourism types and that the development plan should aim to enhance all tourist infrastructure throughout the county,

while also investing in communities to provide new destinations, as well as driving the local economy. The Dublin Mountains are highlighted as a hub for tourism development, with a focus on active travel enhancing cycling tourism throughout the county. ([SD-C147-228, Failte Ireland, SD-C147-35, Dublin Cycling Campaign, SD-C147-53, Coillte, SD-C147-94, Elizabeth Hickey, SD-C147-48, Millrace Residents association \(MRA\)](#))

It is noted that future collaboration with Failte Ireland and other tourism sector stakeholders can help aid the development of tourism in the county. This collaboration will aid in the development of future tourism stakeholders, as they create growth for the local economy. Request support of the 'Dublin Outdoors' brand initiative. Request for dedicated tourism chapter, supports public transport role in tourism development, requests continued protection of the landscape through Landscape Character Assessment. Support for domestic tourism opportunities (walking, cycling etc) benefiting from the environment and ecology. Request for support of rural based enterprises including tourism. ([SD-C147-228, Failte Ireland, SD-C147-106, Green Party Tallaght, SD-C147-53, Coillte](#))

Other submissions deal with a range of policy across the county. There were suggestions for detailed amendments to various policies and objectives around tourism and walking/cycling in the current plan, suggested changes to their location within the plan and references to policy in other plans. The consideration of kayaking along the river Dodder, the development of a county museum or a science museum, the promotion of festivals and support for current rural policy which aids in the development of rural tourism were put forward. There was support for the development of heritage trails (Tourism Strategy). ([SD-C147-228, Failte Ireland, SD-C147-2, Proinsias Fhlannchadha, SD-C147-222, Keep Ireland Open, SD-C147-141, Ross O'Mullane, SD-C147-30, Alan Fairman, Rathcoole Community Council](#))

A number of submissions deal with a public register of Public Rights of Way within the county, also looking for them to be identified, opened and mapped. ([SD-C147-222, Keep Ireland Open, SD-C147-106, Green Party Tallaght](#))

### **Quarries**

A submission states there should be a ban on all extractive industries throughout the county, including fracking and mining. ([SD-C147-197, South Dublin Environmental Network](#))

Another submission makes a number of points regarding the importance and benefits of the quarry and extractive industry in the county stating that its status should be raised within the Plan. It states also that the plan should reflect the views of the NPF and EMRA RSES. It goes on to state that all planning policy needs to identify, protect, preserve and enable the extractive industries with the county. ([SD-C147-107, Roadstone Limited](#)).

### **Chief Executive's Opinion**

The Chief Executive notes that National and Regional economic development and employment policy (NPF, RSES) emphasises the need to encourage economic growth and increase employment in different sectors of the economy. This is also reflected in the current and previous County Development Plans and should be a key element of the draft Plan.

The Chief Executive notes that the Development Plan review will seek to build on the policies and objectives contained in the current Plan to build and strengthen the County's economic competitiveness, resilience and attractiveness. Policies and objectives relating to the delivery of housing, infrastructure and environmental protection should seek to retain and enhance the attractiveness of the County as a place within which to live, work and invest thereby strengthening its attractiveness for investment. A review being undertaken as part of the preparation of the draft plan will inform the current zoning quantum, locations and the objectives for zoning in the draft plan. The consolidation and sustainable development of existing centres will be a factor to the long-term viability of the County. The importance of including objectives and policies which enable the delivery of development at Adamstown, Clonburris and Tallaght is acknowledged, as is the need to include objectives and policies which secure the growth of third level education, transport hubs and medical and office provision in appropriate settlements such as Tallaght and the SDZ lands.

The Council acknowledges the guiding principles set out for locating strategic employment, the investment in and prioritisation of placemaking and the integration of land use and transport as set out in sections 6.3 and 8.3 of the RSES. As part of the review process of the plan an economic analysis is currently being carried out which will identify opportunities and inform the quantum/location and types of employment to be located within the County in line with the RSES guiding principles and the provisions set out for the identified strategic employment corridors set out in the MASP.

Such analysis will also include an examination of the need for lower density employment uses including measures to address the issues of possible displacement/re-intensification of existing low density employment uses located on strategically identified regeneration lands such as the Naas Road and Tallaght.

The Council will continue to engage with relevant key stakeholders in developing the economic and employment strategy for the forthcoming Development Plan which provides an appropriate balance between residential development and the re-intensification of employment lands and mixed uses.

It is acknowledged that retail activity has an essential role in economic growth and employment throughout the county of South Dublin. The Development Plan review will build on existing policy and objectives and explore new policy options which will strengthen the County's retail function. The specific requests for more flexibility in retail uses and alterations to the policy approach to retail development is noted and will be considered at Draft Plan stage. The Chief Executive welcomes the proposal to update the Retail Strategy for the East and Midlands Region but notes that the current Retail Strategy for the Region applies until such an update is completed.

The South Dublin County Retail Hierarchy is set out in Chapter 5, Table 5.1 of the current development plan and has been derived from the Retail Strategy for the Greater Dublin Area (2008-2016) and updated to take account of the existing scale and function of centres within the County. This table is consistent with the provisions of RPO 6.11 and table 6.1. The Draft Plan will carry forward such provisions for retailing and review where necessary to facilitate and guide future growth of the retail sector within the County.

The substantial number of submissions relating to the tourism industry in the county are acknowledged and the value of tourism to the economic growth of the county is fully appreciated. The importance of tourism infrastructure, the hospitality industry and the very significant tourist attractions in the county are a source of pride to the local authority and those who live and work in the county. The Draft County Development Plan will continue to support the Tourism Strategy for the county and provide policy to promote tourism.

The Chief Executive notes that the current County Development Plan contains policy and objective which promote the preservation of public rights of way. It also promotes the creation of Permissive Access Routes and heritage trails that will facilitate access to high amenity, scenic and recreational lands. Existing policy also promotes the continued development of the Dublin Mountain Way and the Wicklow Way in association with the Dublin Mountain Partnership. It is considered it appropriate to include similar policies in the new Draft Plan.

The Chief Executive recognises the importance of quarries and the extractive industry to the county and also recognises that they must be managed carefully to ensure the greatest protection possible to the environment through compliance with environmental legislation and regulations.

The submissions of An Post are noted. Any individual planning application will be addressed on a case by case basis. However, the planning department's Development Management Unit will liaise with An Post and any other developer in relation to parking, access and other related issues on request.

It is agreed that the future approach to the development of data centres in the county should be considered.

While a number of submissions raised issues in relation to commercial rates and the creation of an events app, it is noted such issues fall outside the scope of the County Development Plan, the purpose of which is to set out a framework for the spatial growth and development of the County.

### **Chief Executive's Recommendations**

The recommendations below include the relevant recommendations for the neighbourhood areas as they relate to this strategic issue.

It is considered that that policies and objectives in the Draft Plan:

- Support economic growth within the County, having regard to the National Planning Framework and the Regional Spatial and Economic Strategy and recognise the strategic importance of established urban centres.
- Support the delivery of infrastructure that will attract both sustainable FDI investment and indigenous enterprise at appropriate locations throughout the county, in particular where it reduces the need for commuting.

- Support a broad-based economy within the County, catering for different skill levels and increasing economic resilience.
- Ensure flexibility to facilitate existing and future trends in economic development and employment, including identification of appropriate zoning objectives and being supportive of different ways of working whether from home or otherwise.
- Review the existing retail hierarchy within the county having regard to the Greater Dublin Area Retail Strategy, or any superseding strategy, and explore the opportunity to strengthen the retail function in the county
- Promote and facilitate the sustainable growth of South Dublin's tourism offer in both urban and rural areas, including by improving active travel opportunities for people to access these destinations
- Review and update existing policies and objectives to support the protection and promotion of public rights of way in the county.

## 4.2.7 Natural Heritage and Biodiversity

### Summary of Issues Raised

There were 67 issues raised in relation to the strategic issue Natural Heritage and Biodiversity as set out in the table below.

Topic: Natural Heritage and Biodiversity	Issues Raised	% of Total
Landscape Character	2	2.98%
Landscape Protection	5	7.46%
Biodiversity	32	47.76%
Green Infrastructure	18	26.86%
Environmental Reports	10	14.92%
Total	67	100%

### Landscape Character

Submissions have welcomed the preparation of a South Dublin Landscape Character Assessment as part of the County Development Plan review. A submission raised the issue that the Landscape Character Assessment should seek to protect landscape characteristics with measurable outcomes highlighting specific areas for their rural character and setting. Another submission suggested that local authorities consider/reconsider their Landscape Character Assessment (LCA) and identify landscape sensitivities vis a vis renewable energy developments. ([SD-C147-31, EMRA](#)) ([SD-C147-99, Ne Graver](#)) ([SD-C147-53, Coillte](#))

### Landscape Protection

A number of submissions have suggested a Green Belt zoning objective should be included within the plan in place of existing open space and rural zonings currently set out within or adjoining urban areas. It is further suggested that the landscape is changing, it needs to be preserved to avoid coalescence, a transitional zone between rural and urban areas is recommended. ([SD-C147-47, Jennifer Doyle](#)) ([SD-C147-54, ReNewcastle Community Group](#)) ([SD-C147-158, Teresa Carroll](#)) ([SD-C147-87, Deirdre tierney](#))

A submission called to include a strategy to protect and enhance the special amenity order for Waterstown Park and the Liffey Valley, including the protection and enhancement of heritage structures including the Silver Bridge in Palmerstown. [The Silver Bridge is also addressed in the Built Environment and Placemaking section of this report] ([SD-C147-139, Fergal Mullally](#))



## Biodiversity

The Department of Culture, Heritage and the Gaeltacht advises that we are in a national and global biodiversity crisis. Government policy on nature conservation is clearly set out in the National Biodiversity Action Plan 2017-2021 (NBAP) and Ireland is fully committed to halting the loss of biodiversity and the degradation of ecosystem services as set out in the EU Biodiversity Strategy to 2030. Ireland is a signatory to the United Nations (UN) Convention on Biological Diversity Strategic Plan for Biodiversity 2011-2020.

The Department points out the role biodiversity plays in maintaining our physical and mental health and indicates that a County Development Plan that has biodiversity embedded in its core policies will help build a county that is a healthy place for its people and visitors, and that will provide other valuable ecosystem services such as food production and clean air and water.

The Department recommends that the Development Plan includes natural heritage objectives that are clear and robust, and there is an objective to protect, conserve and enhance biodiversity both within and outside protected sites.

Numerous submissions have called for the protection, preservation, enhancement, promotion, and improvement of biodiversity within the County and that a Biodiversity Plan is required alongside an expansion of the Pollinator Programme. Another submission suggests that South Dublin's Biodiversity Plan should align with planning proposals. It is further advised that when preparing the Draft Plan that national, regional and sectoral plans should be taken into account.

Submissions consider that open space should be integrated into each land use zoning category as a means of protecting and enhancing natural heritage and biodiversity within the County. ([\(SD-C147-44, Rebuild the Silver Bridge\)](#) ([\(SD-C147-25, Thomas Gallagher\)](#), ([\(SD-C147-75, Hugh Durkin Nigel Smith\)](#) ([\(SD-C147-198, Carly Bailey\)](#) ([\(SD-C147-56, Paul Murphy\)](#) ([\(SD-C147-74, Hugh Durkin\)](#) ([\(SD-C147-136, Niall Healy\)](#) ([\(SD-C147-38, Environmental Protection Agency\)](#) ([\(SD-C147-86, Four Districts Woodland Habitat Group\)](#) ([\(SD-C147-83, Geraldine Kelly\)](#) ([\(SD-C147-96, Public Participation Network\)](#) ([\(SD-C147-106, Green Party Tallaght\)](#) ([\(SD-C147-190, Eoin Ó Broin\)](#) ([\(SD-C147-169, South Dublin Conservation Society, South Dublin Conservation Society\)](#) . ([\(SD-C147-113, John Stephens\)](#) ([\(SD-C147-99, Ne Graver\)](#) ([\(SD-C147-139, Fergal Mullally\)](#) ([\(SD-C147-87, Deirdre tierney\)](#) ([\(SD-C147-202, Cllr Alan Hayes\)](#) ([\(SD-C147-94, Elizabeth Hickey\)](#)

A submission considers that open space should be integrated into each land use zoning category as a means of protecting and enhancing natural heritage and biodiversity within the County. ([\(SD-C147-86, Four Districts Woodland Habitat Group\)](#)))

A submission notes that the SDCC Biodiversity Plan should be used when assessing open space within new developments. ([\(SD-C147-122, Proinsias Fhlannchadha\)](#)

Several submissions raised concerns regarding the need to retain existing woodlands requesting that they be protected and preserved together with their associated wildlife. In addition, they should be retained as valuable amenity areas and for their value as effective flood defence measures. ([\(SD-C147-117, alistair mullan\)](#) ([\(SD-C147-206, Patrick Healy\)](#) ([\(SD-](#)

[C147-169, South Dublin Conservation Society, South Dublin Conservation Society](#)) ([SD-C147-136, Niall Healy](#))

It has been variously suggested in submissions that SDCC Tree Policy 2015-2020 include trees within hedgerows and woodland settings and non-urban settings, that fruit and nut trees should be provided in parklands, that the provision of urban forests would have a positive role for biodiversity and that each resident of SDCC should be provided with a tree to plant. A submission also calls for a comprehensive tree planting program based around 'Steppingstone Forests' to educate children about the importance of planting and care of forests. ([SD-C147-99, Ne Graver](#)) ([SD-C147-73, Knocklyon Network](#)) ([SD-C147-61, South Dublin Chamber](#)) ([SD-C147-141, Ross O'Mullane](#)) ([SD-C147-139, Fergal Mullally](#)) ([SD-C147-86, Four Districts Woodland Habitat Group](#))

Several submissions suggest the need for an increase in tree planting in the county and provide tree replacement programmes for new developments. ([SD-C147-73, Knocklyon Network](#)) ([SD-C147-106, Green Party Tallaght](#)) ([SD-C147-106, Green Party Tallaght](#)) ([SD-C147-169, South Dublin Conservation Society, South Dublin Conservation Society](#))

A submission has called for an increase in the number of Tree Preservation Orders. ([SD-C147-87, Deirdre tierney](#)) ([SD-C147-190, Eoin "Broin"](#))

Submission requests that improved angling amenities are provided for within the county, which will enhance the biodiversity quality of angling waters and increase flora and fauna. ([SD-C147-205, Fergal Scully](#))

The Department Culture, Heritage and the Gaeltacht submission acknowledges the Council's positive steps in promoting, conserving and enhancing biodiversity within the county, including its management of extensive areas of grassland in its parks to maximise their value for wildlife and insects in conformity to the All-Ireland Pollinator Plan; its adoption of effective policies to control invasive plant and animal species and its publication of the Draft Biodiversity Action Plan in July 2020.

The Department recommends that the Council include objectives in its development plan to implement and monitor the actions set out in the National Biodiversity Action Plan, as the conservation of biodiversity is an essential component of sustainable development. The Department also recommends that biodiversity considerations are integrated into all sections of the CDP and are taken into account when zoning lands for development.

The review of the plan's policies and objectives should take place with a view to streamlining and strengthening policies and ensuring that they are consistent with current EU and National plans, reports, guidance documents and case law relating to biodiversity (i.e. policies and objectives must be biodiversity-proofed).

The Department would welcome the inclusion of an objective whereby all public buildings and public open spaces in the county would incorporate positive biodiversity measures as standard practice.

([SD-C147-143, Manager Dau, Dept. of Arts, Heritage and the Gaeltacht](#))

Submission requests that the Biodiversity Action Plan should be used to inform the new Draft Plan and an updated Heritage Action Plan is required. ([SD-C147-106, Green Party Tallaght](#))

Submission suggests that a biodiversity officer should be appointed within the Council. The use of artificial grass and paving should be discouraged, as it impacts on biodiversity. Agricultural lands should be protected from further urban sprawl; agricultural and rural diversification should be promoted especially for food growth. ([SD-C147-169, South Dublin Conservation Society, South Dublin Conservation Society](#))

### **Green Infrastructure**

It is suggested that a Liffey Valley Park extending along the River Liffey to Straffan in Co. Kildare should be provided to link up with the heritage amenities across the Liffey Valley. ([SD-C147-44, Rebuild the Silver Bridge](#)).

Several suggestions call for the development of a Green Infrastructure network to protect and enhance biodiversity, safeguard lands from future development, and ensure that future developments are interweaved into the landscape. ([SD-C147-157, Yvonne Collins](#)) ([SD-C147-99, Ne Graver](#)) ([SD-C147-106, Green Party Tallaght](#)) ([SD-C147-203, Betsy Omidvaran](#)) ([SD-C147-169, South Dublin Conservation Society, South Dublin Conservation Society](#))

Several submissions call for the potential development and completion of Greenway infrastructure such as Dodder-Blessington Greenway Link, Grand Canal Greenway and others. ([SD-C147-6, Ross Killen](#)) ([SD-C147-56, Paul Murphy](#))

Submissions call for protection and preservation of Rathcoole woodlands and to incorporate it into Rathcoole Park and form a wider nature trail extending from Saggart to Lugg Woods. ([SD-C147-81, Gordon Place](#) [SD-C147-84, Julie Prenderville](#) [SD-C147-136, Niall Healy](#) [SD-C147-86, Four Districts Woodland Habitat Group](#)) ([SD-C147-160, Irish Wildlife Trust](#))

A submission has highlighted that the Landscape Character, Natura 2000 sites and Sites of Geological Interest should be supported at the County level by the Green Infrastructure and Open Space Strategies, and the Biodiversity Action Plan. These strategies and Action Plan need to address the problems identified in the SEA for the current County Development Plan. ([SD-C147-99, Ne Graver](#))

Several submissions suggest the need for an increase in tree planting in the county and provide tree replacement programmes for new developments. ([SD-C147-73, Knocklyon Network](#)) ([SD-C147-106, Green Party Tallaght](#)) ([SD-C147-106, Green Party Tallaght](#)) ([SD-C147-169, South Dublin Conservation Society, South Dublin Conservation Society](#))

It is recommended that all hedgerows be retained and where removal is absolutely necessary that the equal length of replacement hedgerow is planted. A list of native hedgerows should be provided in the CDP. ([SD-C147-143, Manager Dau, Dept. of Arts, Heritage and the Gaeltacht](#)) ([SD-C147-106, Green Party Tallaght](#))

Several submissions have welcomed the preparation of the Green Infrastructure Strategy. EMRA has recommended that Chapter 7 and 10 of the RSES is incorporated into the new Plan. ([SD-C147-143, Manager Dau, Dept. of Arts, Heritage and the Gaeltacht](#)) ([SD-C147-106, Green Party Tallaght](#)) ([SD-C147-31, EMRA](#))

The Department of Culture, Heritage and the Gaeltacht requests that setback distances that support the attainment of high ecological status for water bodies the conservation of biodiversity, good ecosystem health and provide buffer zones for flood plains be included in the Draft Plan. ([SD-C147-143, Dept. of Arts, Heritage and the Gaeltacht](#))

A further submission encourages the inclusion of policies and objectives on the use of SUDS and Green Infrastructure. ([SD-C147-57, Niamh McDonald, Irish Water](#))

## **Environmental Reports**

### **Appropriate Assessment**

Submission from Department of Culture, Heritage and the Gaeltacht recommends that Appropriate Assessment, Environmental Impact Assessment and Ecological Impact Assessment (EclA) as required and appropriate are carried out for all downstream plans and projects. The Department indicates that it is imperative that environmental assessments (Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA)) in relation to the CDP are integrated with the plan-making process and apply the precautionary principal to ensure there is no further deterioration of habitats and species both within and outside designated sites across the county and its zone of influence. If projects are not subject to EIA, assessment of biodiversity impacts should be facilitated through the preparation of an ecological impact assessment (EclA). ([SD-C147-143, Manager Dau, Dept. of Arts, Heritage and the Gaeltacht](#))

It is recommended that SEA/AA should include an assessment of the impacts of nitrogen deposition on Natura 2000 sites within the draft CPD's zone of influence and additional assessment of greenhouse gas emissions subject to availability of an agreed methodology at national level. ([SD-C147-143, Dept. of Arts, Heritage and the Gaeltacht](#), [SD-C147-31, EMRA](#)).

A submission requested that all planning applications should be assessed against habitats legislation. ([SD-C147-197, South Dublin Environmental Network](#))

### **Environmental Impact Assessment**

Submission requests greater use of Environmental Impact Assessment on all developments to assess impacts of biodiversity. ([SD-C147-106, Liam Sinclair, Green Party Tallaght](#))

### **Strategic Environmental Assessment**

A submission suggests when preparing the CDP that consideration is given to 'SEA of Local Authority Land Use Plans- EPA Recommendations and Resources' and ensure the Plan is aligned with the NPF and RSES. ([SD-C147-38, Environmental Protection Agency](#))

It is stated that a significant issue is missing from the Issues Consultation Booklet in indicating how the identification of the issues has been influenced by the environmental assessment of the previous South Dublin County Development Plan 2016 - 2022. The determination of the success, or otherwise, of the policies of the previous plan in relation to the environmental impact on the surrounding environment of that Plan is a critical consideration in the formulation of the new plan. This will lessen the likelihood of sustainable and environmentally positive outcomes in South Dublin. ([SD-C147-99, Ne Graver, SD-C147-86, Four Districts Woodland Habitat Group, SD-C147-46, Dara Larkin](#))

Submission from Department of Culture, Heritage and the Gaeltacht recommends that Appropriate Assessment of the draft CDP should include an assessment of the impacts of nitrogen deposition on Annex 1 habitats outside European sites. Such sources can include nitrogen (NOx) emissions from combustion processes in cars, domestic heating systems or energy generation facilities and should be taken into account when considering the location of energy facilities within the county. The submission indicates that consideration should also be given to monitoring nitrogen deposition in the Strategic Environmental Assessment of the Plan. More broadly, the Department has indicated it would welcome a clear and specific monitoring plan to be included with the Strategic Environmental Report that would clearly outline how it is proposed to record the impacts of plan implementation on biodiversity, both in terms of biodiversity loss and biodiversity enhancement during the lifetime of the CDP. ([SD-C147-143, Manager Dau, Dept. of Arts, Heritage and the Gaeltacht](#))

### **Strategic Flood Risk Assessment**

The OPW recommends that reference should be made in the CDP to the Guidelines on the Planning System and Flood Risk Management DHPLG/OPW, Nov 2009) and associated Circulars and Technical Appendices to ensure that the key principles of flood risk management and sustainable planning are adopted. It is noted that the sequential approach to managing flood risk within the planning system should be used at the earliest stage in the CDP process and where risk exists, the precautionary approach then adopted. The submission outlines the three stages of flood risk assessment.

Stage 1 Flood risk identification  
Stage 2 Initial flood risk assessment  
Stage 3 Detailed flood risk assessment

The OPW recommend that particular attention be paid to the following sections of the Flood Risk Guidelines;

The Planning Principles, the Sequential Approach, Definitions of Appropriate Development, and The Plan making Justification Test. Where it is intended to zone or otherwise designate land in areas of moderate or high probability of flooding, the application of the Justification Test must be supported by detailed analysis.

The OPW highlights specific flood risk management issues for consideration. It is pointed out that the RSES requires the implementation of regional Flood Risk Management Plans and Flood Maps prepared by the OPW, (CFRAMS) and (FRAMS). SDCC is requested to take full

regard of the following FRAMS; Liffey and Dublin Bay, Baldonnell, Dublin City, Hazelhatch, Leixlip and Lucan to Chapelizod. SDCC should also have regard to the ongoing design, planning and implementation of flood relief schemes for the Poodle, the Camac and Dodder (Whitechurch Stream) rivers and ensure that the zoning and objectives of the Development Plan take account of these schemes. It is noted that there is an obligation on local authorities to maintain any flood relief schemes completed under the Aerial Drainage Act including the Griffeen in Lucan. The OPW suggests that the Council should consider including a register of key flood risk infrastructure in the County Development Plan. ([SD-C147-41, Rachel Woodward, Office of Public Works](#))

The OPR advises against the use of information from Office of Public Work's (OPW) Preliminary Flood Risk Assessment (PFRA) and arterial drainage benefitting lands maps to inform the SFRA. ([SD-C147-144, Office of the Planning Regulator](#))

EMRA recommends that as the CDP develops, further opportunity for focused environmental assessment will be required, including Strategic Flood Risk Assessment (SFRA) as set out in RPO 7.12 of the RSES, further to this RPO 7.15 states that Local Authorities shall take opportunities to enhance biodiversity and amenities and to ensure the protection of environmentally sensitive sites and habitats, including where flood risk management measures are planned. ([SD-C147-31 Pauline Riordan, EMRA](#))

A further submission highlights the importance of trees and woodlands as a key component of effective flood defence strategies. ([SD-C147-136, Niall Healy](#))

## **Chief Executive's Opinion**

The submissions are noted. A review of the Landscape Character Assessment for the County is currently being carried out which will assess the robustness of existing policies and objectives and inform the development/enhancement of same as required. This review will be carried out according to best practice and incorporate the whole county including areas identified in the submissions. Its purpose is to provide guidance for development within the different landscape character areas of the County.

The National Planning Framework (NPF) National Policy Objective (NPO) 62 references the role of greenbelts in preventing coalescence of built up areas but also in allowing long term expansion of urban areas. A review of zoning will be carried out, having regard to land use requirements, which will inform future policy and objectives within the Plan.

The Liffey Valley Special Amenity Area Order was confirmed in 1990 as the Dublin County Council (Lucan Bridge to Palmerston) Special Amenity Area Order giving protection to the relevant area of the Liffey Valley. The area covered by the Order is zoned as High Amenity in the current County Development Plan and as such is provided with a high level of protection reflecting the intent of the Order.

The Council recognises that there is a global biodiversity crisis. It is policy under the current County Development Plan to protect the natural heritage and biodiversity of the County. The Council has signed up to the All-Ireland Pollinator Plan and supports the development of

green networks across the County through the CDP, County Heritage Plan, recently agreed County Biodiversity Action Plan and the Climate Change Action Plan.

The Draft Plan will seek to build on the existing policies to protect and enhance biodiversity and to build on its role in improving human health and wellbeing. Such measures will be informed and supported by the environmental assessments which will accompany the plan, the review of the Landscape Character Assessment for the County and the Green Infrastructure Strategy currently being prepared as an integral part of the preparation of the new Plan.

Trees are recognised as an asset not only in terms of biodiversity but also for their aesthetic value and for their part in climate action by acting as carbon sinks. The Development Plan will include policy to encourage greater tree planting in the county and to retain existing trees and hedgerows where appropriate. Regarding Tree Preservation Orders the Current County Development Plan identifies 4 no. tree preservation orders registered within the County as out in table 9.5. The designation of tree preservation orders is not a matter for the development plan. However, the development plan will recognise the conservation value of trees and groups of trees that are the subject to a Tree Preservation Order.

The sharing of thoughts and ideas for the management of the County's Green Infrastructure (GI) is welcomed. The preparation of a Green Infrastructure Strategy for the County is underway and includes expert consultants. It is intended to liaise with adjoining authorities as part of the preparation of the Green Infrastructure Strategy. Being an integral part of the Development Plan and the formulation of spatial policy, public consultation on the green infrastructure strategy will be provided for as part of the significant public consultation process of the Development Plan.

The Green Infrastructure Strategy will incorporate relevant provisions of the County's Biodiversity and Climate Action Plans as well as relevant elements of the SFRA, SEA and AA which are currently being prepared in conjunction with the Draft Plan. Green Infrastructure, as a tool for providing ecological, economic, and social benefits through natural solutions is considered to meet many of the County's core values, including health and wellbeing and sustainability. It will build on the County's resilience to climate change, responsibility to the environment and create an attractive place to live, visit and do business.

The current County Development Plan contains policies and objectives providing for the protection and enhancement of the Liffey Valley and supporting the Liffey valley SAAO. Public parks and open spaces are a key asset within the Green Infrastructure network and they also provide for active and passive recreational amenity for the public. There are policies and objectives in the current Plan for the development of Greenways which will be reviewed, enhanced and updated as necessary in the Draft Plan.

Specific requests for the inclusion of policy and objectives in relation to the protection of Rathcoole Woods and the extension of the Liffey Valley Park are noted. As per the land use designation the Council is preparing a housing masterplan for the Rathcoole lands, with an initial proposal presented to Council in 2019. As part of this work an ecological assessment is underway, and this work will inform the next steps. Liffey Valley Park is an objective of the

management plan for the Liffey Valley SAAO which sought to provide open space on both sides of the river while not acquiring new land. Waterstown Park is a key element in South Dublin's delivery of this objective.

The setback distances from riparian ways will be reviewed as part of the GI Strategy and the environmental assessments for the plan preparation and the outcome of that process will inform policy and objectives of the Draft Plan.

All development must comply with EU and national legislation in relation to required environmental assessments. This is required by legislation, but the draft Plan can make reference to that requirement.

Submissions in relation to Appropriate Assessment at this stage of the Development Plan process are welcomed. Consultants have been employed to undertake assessments under the Habitats Directive and the Strategic Environmental Assessment Directive to ensure that policies and objectives of the County Development Plan 2022-2028 have been fully assessed against environmental and Natural 2000 conservation objectives. These assessments have commenced, and the draft AA will inform policies and objectives within the Draft Plan. In preparing the Draft Plan, the Council will comply with all appropriate legislation and guidelines.

As indicated above, a Strategic Environmental Assessment of the draft Plan has commenced and will inform the draft policies and objectives. In preparing the Draft Plan, the Council will comply with all relevant legislation and guidelines, as well as considering the 'SEA of Local Authority Land Use Plans- EPA Recommendations and Resources' and ensure alignment with the provisions of the NPF and RSES. It is fully recognised that the draft Plan will have to provide for a fit for purpose monitoring system which will give feedback on the extent to which the policies, objectives and indicators included in the Draft Plan and SEA will be achieved over the lifetime of the Plan. As part of the SEA for the draft Plan, the consultants will undertake a review of the policies and objectives of the current 2016-2022 Development Plan.

The request to monitor nitrogen deposits on Annex 1 habitat both within and outside designated sites is noted. This will be considered as part of the Strategic Environmental Assessment of the draft Plan and its associated monitoring indicators.

A Strategic Flood Risk Assessment will be carried out as required having regard to the Floods Directive and the section 28 'Planning System and Flood Risk Guidelines'. Consultants have been engaged to carry out the assessment, which will run in tandem with the Draft Plan. The draft SFRA will inform policies and objectives within the Draft Plan and will take account of recommendations and guidance from the OPW. The submission from the OPR is noted and will be considered as part of the review and updating of the current SFRA, in the preparation of the Draft Plan.

Environmental Impact Assessment is required to assess the effects of certain public and private projects on the environment. It is not required as part of the plan making process of the Development Plan. The Development Plan will set the framework for certain projects



and planning applications which will require an EIA if they meet the thresholds or criteria set out in the Planning and Development Acts.

## **Chief Executive's Recommendations**

The recommendations below include the relevant recommendations for the neighbourhood areas as they relate to this strategic issue.

It is recommended that the draft Plan include policies and objectives that:

- Ensure that the updated South Dublin Landscape Character Assessment inform policies and objectives in the draft Plan.
- Prepare a Green Infrastructure Strategy as an integral part of the draft Plan preparation to ensure that the ecological, economic, and social benefits to the County can be integrated into relevant policy and objectives through natural solutions
- Continue to reflect the objectives of the Liffey Valley Special Amenity Area Order through relevant zoning and other objectives within the Plan seeking to increase access where appropriate and feasible
- Develop policies and objectives within the Draft Plan that reflect the objectives of the National Biodiversity Action Plan 2017-2021, or subsequent plans
- Provide for measures and indicators to monitor the environmental impact of the Development Plan
- Include a list of existing Tree Preservation Orders in the Development Plan
- Ensure that the Development Plan provides for appropriate protection of trees and hedgerows, where possible, recognising their value to our natural heritage, biodiversity and climate action and encourage tree planting in appropriate locations.
- Ensure that the preparation of the Draft Development Plan is carried out in conjunction with the SEA, AA and SFRA processes in compliance with legislative requirements and section 28 Guidelines
- Provide for relevant projects to be subject to environmental impact assessment as required by Directive 85/337/EEC (EIA) as amended and codified and, where necessary and appropriate seek ecological impact assessment for sub-threshold developments

## 4.2.8 Infrastructure and Utilities

### Summary of the Issues Raised

There were 59 issues raised in relation to Infrastructure and Utilities. The most pressing issues related to Energy Networks, Renewable Energy and Information and Communications Technology (ICT). A breakdown of the issues can be seen in the table below.

Topic	Issues Raised	% of Total
Infrastructure and Utilities – General	7	11.9%
Energy Networks, Renewable Energy & ICT	19	32.2%
Waste Management	7	11.9%
Water Supply & Wastewater Drainage	15	25.4%
Surface Water, Ground Water & Flood Risk	4	6.8%
Noise	7	11.9%
Total	59	100%

### Infrastructure and Utilities General

Several submissions expressed the need for the Draft Plan to ensure the timely provision of enabling infrastructure to support the needs of South Dublin's growing population. A shift to 'infrastructure first' planning is recommended and linking this to the UN Sustainable Development Goal 11 and to the Programme for Government, Towns First policy.

Green infrastructure should be considered on a par with social and physical infrastructure.

One submission calls for national infrastructure providers to support the Local Authority in the growth of sustainable centres.

The climate and biodiversity crisis should inform all decision-making regarding infrastructure and utilities. The 'doughnut economics' model for public policy formation adopted in Amsterdam and Philadelphia is put forward as a way to achieve sustainable development. ([SD-C147-156, Dublin Chamber](#)) ([SD-C147-31, EMRA](#)) ([SD-C147-16, Rathcoole Community Council](#)) ([SD-C147-74, Hugh Durkin](#)) ([SD-C147-106, Green Party Tallaght](#)) ([SD-C147-82, Declan Hanley](#)) ) ([SD-C147-88, Una Ruddock](#))

### Energy Networks, Renewable Energy and Information and Communications Technology

The summary, Chief Executive's opinion and recommendations for renewable energy are set out in the Climate Action and Energy section of this report.

EMRA highlight the need for the Draft Plan to have regard to Eirgrid's Transmission Development Plan (2018-2027) which is the plan for the development of the Irish transmission network and interconnection up to 2028. ([SD-C147-31, EMRA](#))

The ESB request that the Draft Plan protects the County's future capacity for the development of electricity transmission and distribution infrastructure. ([SD-C147-185, Electricity Supply Board](#))

EirGrid in their submission request appropriate and robust policies and objectives for planning the national grid infrastructure and prioritising it appropriately in order to deliver national, regional and local benefits, and refer to the RSES and the Regional Policy Objectives in relation to energy provision. Eirgrid request that the Draft Plan facilitate the development of grid reinforcements including grid connections and a transboundary network into and through the City and between all adjacent counties and to support the development of international connections. They suggest that policies and objectives which support a safe, secure and reliable supply of electricity need to be explicit in the Draft Development Plan in order to assist EirGrid in the successful implementation of its *Grid Development Strategy - Your Grid, Your Tomorrow* (2017) ([SD-C147-115, EirGrid](#))

A number of submissions requested that all pylons, powerlines and cables be placed underground. ([SD-C147-198, Carly Bailey](#)) ([SD-C147-141, Ross O'Mullane](#))

The ESB called for policies and objectives in the Draft Plan to facilitate the expansion and improvement in telecommunications infrastructure in order to help position the county to attract intellectual and physical capital and to act as a mechanism to improve virtual connectivity. Another submission recommended the installation of the fastest broadband service in South Dublin. A further submission requests that the Council, in assessing applications for telecommunications infrastructure, take into account the impact on established walking routes. A further submission requests that telecommunication masts be located sensitively. ([SD-C147-185, Electricity Supply Board](#)) ([SD-C147-222, Keep Ireland Open](#)) ([SD-C147-198, Carly Bailey](#))

## **Waste Management**

The Department of Communications, Climate Action and Environment request that all waste management related matters within the Draft Plan are discussed with the respective Regional Waste Management Planning Office. ([SD-C147-1, Department of Communications, Climate Action and Environment](#))

A number of submissions expressed the need for additional bring centres and recycling facilities, particularly for recycling heavy household items, to serve the growing population in South Dublin. Concerns were also raised in regard to the cost burden on low-income households and the need to review policy in relation to refuse and recycling to mitigate against illegal dumping. A further submission also calls for domestic waste to be controlled by the Council. ([SD-C147-32, Tracy Walsh](#)) ([SD-C147-25, Thomas Gallagher](#)) ([SD-C147-198, Carly Bailey](#)) ([SD-C147-96, Public Participation Network](#))

A number of submissions highlight the need to reduce waste in the county, particularly from excess packaging and single use plastics and calls for the Council to ban single use plastics. ([SD-C147-25, Thomas Gallagher](#)) ([SD-C147-73, Knocklyon Network](#)) ([SD-C147-141, Ross O'Mullane](#))

## **Water Supply and Wastewater Drainage**

Irish Water draws attention to Section 10.2 of the RSES which provides general policy direction in relation to the sustainable management of water supply and wastewater needs. They indicate that their Draft Investment Plan 2020-2024 has been approved by the Regulator and work has commenced internally in IW to review it and to align it with Irish Water's Strategic Funding Plan and work plans and programmes. IW have advised that they will keep South Dublin County Council informed of this process.

Irish Water encourages sequential development in areas with existing water services infrastructure and spare capacity.

Water supply is indicated as being low during critical periods of drought / significant winter events. The long-term development of the GDA region will be dependent on the Water Supply Project for the Eastern Region. The National Water Resources Plan will outline the longer term plan for the South Dublin area and is due to be published for public consultation by IW later this year. IW have indicated that prioritisation will be given to domestic supply on a first come, first served basis.

South Dublin is primarily served by Ringsend Wastewater Treatment Plant which is currently undergoing upgrade works. This, in conjunction with the proposed greater Dublin drainage project, will provide capacity for the growth of the South Dublin area into the future.

On climate change, IW have stated that they will work with the Council to ensure the overarching goals of mitigating against, and adapting to, climate change in relation to water and wastewater are achieved.

Irish Water encourages the inclusion of policies and objectives on the use of Sustainable Urban Drainage Systems and Green Infrastructure in new developments and retrofitted in existing developed areas. ([SD-C147-57, Irish Water](#))

The OPR advises the Local Authority to continue to work proactively with Irish Water to progress projects that deliver infrastructure to support development in strategic development areas consistent with the RSES. ([SD-C147-144, Office of the Planning Regulator](#))

In respect to water supply, Irish Water's strategic project to provide connectivity between the major treated water reservoirs at Peamount and Saggart in South Dublin County was welcomed. Further submissions relating to water supply request that the Council have regard in the Draft Plan to drinking water standards and provision while also calling for the existing water services infrastructure to be updated. ([SD-C147-74, Hugh Durkin](#)) ([SD-C147-207, Monica McGill](#)) ([SD-C147-141, Ross O'Mullane](#))

In respect to wastewater drainage, the issue of increased pressure on wastewater infrastructure due to residential developments was raised with calls for the Council to ensure that wastewater capacity keeps pace with increased demand. ([SD-C147-106, Green Party Tallaght](#))

### **Surface Water, Ground Water and Flood Risk**

The OPW indicates that reference should be made in the draft development plan to the Guidelines on the Planning System and Flood Risk Management (DHPLG/OPW, Nov 2009) and to a sequential or precautionary approach to flood risk. The impacts of climate change should be accounted for. It is recommended that South Dublin County Council has full regard in the preparation of its Development Plan 2022 – 2028 to the proposed development of flood relief schemes at Lucan to Chapelizod, and the ongoing design, planning and implementation of flood relief schemes in Poddle River, Camac River, and Dodder River (Whitechurch Stream). The Council is requested to consider including a register of key flood risk infrastructure in the County Development Plan. The preparation of the development plan should take account of the opportunities for natural water retention measures to reduce runoff and provide other benefits such as to water quality, biodiversity, etc. including SUDS measures.

The OPW expressed the need for the Draft Plan to ensure access requirements are preserved for maintenance of arterial drainage schemes, drainage districts, protection of agricultural embankments.

The OPR recommend against the use of information from the Office of Public Work's (OPW) Preliminary Flood Risk Assessment (PFRA) and arterial drainage benefitting lands maps to inform the SFRA.

The EMRA advise the Local Authority to have regard to RPO 7.43 of the RSES and the need to identify flood risks and ensure the resilience of critical infrastructure in preparing the Draft Plan.

Irish Water has indicated that it is committed to working with public bodies and other stakeholders towards a common goal of the protection of drinking water sources and is involved in pilot drinking water source protection projects.

A further submission sets out recommended changes to surface water and groundwater policy and provisions in the current Development Plan. Another submission highlights the need for Irish Water to clear drains in public parks. One submission outlines specific issues relating to the protection and preservation of the fresh water source to a property which is a protected structure in Newcastle.

A number of submissions call for the Council to protect and improve the water quality of our watercourses including rivers, streams and canals within the county. The Department of Culture, Heritage and the Gaeltacht in their submission set out a number of recommendations in relation to development along watercourses and advise the Council to have regard to the Inland Fisheries Ireland Document 'Planning for Watercourses in the

Urban Environment' in relation to formulating objectives and policies for riparian zones in the Draft Plan. Issues raised in relation to the Camac river included calls for a river management plan for the Camac and the provision of a reservoir near its source in order to maintain water flow throughout the summer.

[\(SD-C147-41, Office of Public Works\)](#) [\(SD-C147-31, EMRA\)](#) [\(SD-C147-222, Keep Ireland Open\)](#) [\(SD-C147-50, James McNerney Planning Consultant\)](#), [\(SD-C147-144, Office of the Planning Regulator\)](#), [\(SD-C147-57, Irish Water\)](#) [\(SD-C147-197, South Dublin Environmental Network\)](#) [\(SD-C147-25, Thomas Gallagher\)](#) [\(SD-C147-143, Dept. of Culture, Heritage and the Gaeltacht\)](#) [\(SD-C147-49, Niall Charleton\)](#)

## Noise

A number of submissions raise concerns in relation to noise from major and national roads within the County such as the M50, N7 and N4. Several submissions request the implementation of measures to reduce noise levels from the N4. It is also requested that the previous noise study on the N4 be reviewed in light of the new road layout and that noise recordings be carried out over an entire week. It is recommended that tree planting along the N7 be provided to ameliorate noise and that recycled plastic could be repurposed to create soundproofing along the M50.

The TII in their submission request that the Council refer to the requirements of S.I. No. 140 of 2006 Environmental Noise Regulations in the Draft Plan. TII advises that it requires that development proposals identify and implement noise mitigation measures, where warranted. TII indicate that the costs of implementing mitigation measures shall be borne by the developer, as the Authority (TII) will not be responsible for the provision of additional noise mitigation. The EMRA recommends early engagement with relevant agencies to ensure that matters such as noise accord with the relevant EU and national legislation.

[\(SD-C147-177, Fiona Butler\)](#) [\(SD-C147-37, JEAN O'BRIEN\)](#) [\(SD-C147-102, Niall Charleton\)](#) [\(SD-C147-36, Transport Infrastructure Ireland\)](#) [\(SD-C147-141, Ross O'Mullane\)](#) [\(SD-C147-31, EMRA\)](#)

## Chief Executive's Opinion

The Local Authority maintains a close working relationship with all national infrastructure providers including Irish Water, National Transport Authority and Transport Infrastructure Ireland, to ensure the timely provision of infrastructure within the County in line with national and regional policy and objectives.

The 'doughnut economics' model is understood to be a visual framework for sustainable development which seeks to find the balance between the capacity of the planet to sustain human actions without an ecological collapse and human or social needs. The social foundation or inner ring of the doughnut aligns with the UN's 17 Sustainable Development Goals. Since 2015, Ireland has been a signatory to the United Nations Sustainable Development Goals (SDGs). There is significant alignment between the UN SDGs and the National Planning Framework's National Strategic Outcomes (NSOs) in areas such as climate action, clean energy, sustainable cities and communities, economic growth, reduced inequalities and innovation and infrastructure, as well as education and health. The policies

and provisions of the Draft Plan should align with overarching planning policy at national and regional level and the UN Sustainable Goals where relevant.

The Planning Authority is conscious that energy networks will need to be expanded to facilitate population growth and economic development. The draft development plan should continue to include policy to facilitate energy networks having regard to needs and to the proper planning and sustainable development of the county.

The provision of telecommunication infrastructure in Ireland is guided by the Planning Guidelines for Telecommunications Antennae and Support Structures (1996) and Circular Letter PL 07/12 issued by the DECLG. The Council is currently working with the NBP contractor (National Broadband Ireland) to plan for the delivery of high-speed broadband in South Dublin, 5% of all premises. The Council also works with telecommunication operators with their infrastructural investment.

The Local Authority is committed to reducing waste and supports the circular economy approach in relation to waste management in line with the RSES and the Eastern Midland Waste Management Plan 2015 – 2021. The importance of ensuring sufficient waste facilities are available within the County and within new developments is recognised and should be addressed in the draft Plan. While the Local Authority supports a reduction in the use of single use plastics this is not a matter which can correctly be addressed through policies in the Draft Development Plan.

Irish Water is responsible for public water services in Ireland including water supply and wastewater drainage. The Local Authority maintains a close working relationship with Irish Water to facilitate the timely delivery of ongoing upgrades and the expansion of water supply and wastewater services to meet the future needs of the County.

The Local Authority is responsible for surface water management and aquifer protection in the County, with the Office of Public Works (OPW) having responsibility for flood risk management. The main objective of the EU Water Framework Directive (WFD) is to protect and restore water quality in both surface and groundwater. It includes a requirement to 'contribute to mitigating the effects of floods', which has been enacted through the Floods Directive. The implementation of the Floods Directive and the development of Flood Risk Management Plans (FRMPs) are closely linked to the implementation of the Water Framework Directive (WFD). It is important that the objectives of these Directives are met and that projects identified through flood risk management plans and river basin management plans are implemented. Policy in the draft development plan should seek to achieve compliance with the Water Framework Directive and the Floods Directive.

The Environment department of the Council is preparing revised guidelines in relation to surface water and sustainable urban drainage (SUDs). The implementation of SUDs measures is critical to improving water quality and addressing surface water run-off through natural solutions.

Blocked drains are an operational matter for the Council or other responsible body and are not something which is appropriate to address in the development plan.

The County's watercourses form a major and unique element of the Green Infrastructure network. The considered management and enhancement of watercourses and wetland areas can provide effective measures to help manage fluvial and pluvial flooding whilst supporting a quality, multi-functional green network generating multiple benefits for the environment, tourism and society.

The South Dublin County Council Noise Action Plan 2018-2023 includes interactive Strategic Noise Maps for the County which are a graphical representation of weighted predicted annual average road traffic sound levels in the County. The Strategic Noise Maps have been developed in accordance with S.I.No.140/2006 (the Environmental Noise Regulations) and are representative of the average environmental sound levels over one complete year.

South Dublin County Council's Noise Action Plan 2018-2023 is one of four action plans adopted by the four Dublin Authorities as part of the overall Dublin Agglomeration Environmental Noise Action Plan. The key objective of the Dublin Agglomeration Noise Action Plan 2018-2023 is to avoid, prevent and reduce, where necessary, on a prioritised basis the harmful effects, including annoyance, arising from long term exposure to environmental noise from road traffic and rail. At a national policy level, the NPF promotes the pro-active management of noise where it is likely to have significant adverse impacts on health and quality of life and supports the aims of the Environmental Noise Regulations through national planning guidance and Noise Action Plans.

### **Chief Executive's Recommendations**

The recommendations below include the relevant recommendations for the neighbourhood areas as they relate to this strategic issue.

It is considered that that the draft development plan includes policies and objectives to:

- Continue to liaise with national infrastructure providers to co-ordinate, inform and influence the timely provision of infrastructure for the sustainable development of the County.
- Ensure that the Draft Plan is informed and influenced by national and regional policy having regard to their alignment with the United Nations Sustainable Development Goals.
- Facilitate and promote the development of energy networks where necessary to facilitate sustainable growth and economic development, subject to proper planning and sustainable development.
- Promote the development of ICT infrastructure where it facilitates the sustainable growth and economic development of the county
- Recommendations in relation to renewable energy are set out under the Climate Action and Energy section of this report.
- Ensure the objectives of the East Midlands Region Waste Management Plan 2015-2021, or such plans as may be updated, are incorporated where relevant into the Development Plan



- Support the principle of the Circular economy, facilitate the provision of additional bring banks and recycling centres to meet the growing population where a need is identified, and resources allow
- Ensure new development, in particular higher density residential development, provides adequate space for waste management and recycling.
- Engage with Irish Water to facilitate projects that deliver the water services infrastructure necessary to support South Dublin’s settlement strategy, sustainable growth and mitigation and adaptation to climate change in line with national and regional policy.
- Facilitate the achievement of ‘good status’ in all waterbodies in compliance with the Water Framework Directive and associated river basin management plans in the county.
- Ensure a sequential and precautionary approach to flood risk management in line with the requirements of the Guidelines on the Planning System and Flood Risk Management (DHPLG/OPW, Nov 2009)
- Ensure that measures to protect groundwater and drinking water sources are incorporated into the Development Plan
- Ensure that sustainable urban drainage (SUDs) measures are incorporated into the draft Plan to reduce the level of surface water run-off, improve water quality and contribute to adaptation to climate change through natural solutions
- Promote and support the pro-active management of noise including the South Dublin County Council’s Noise Action Plan 2018-2023 which is due for review during the lifetime of the Plan.

## 4.2.9 Miscellaneous (Including Zoning Submissions)

### Outside the Scope of the Plan

#### Summary of Issues Raised

A number of submissions raised issues which are not considered to be covered within the remit of the Draft Plan including particular planning applications, legal matters, procedural issues and other functions and services provided by the Local Authority. Where these submissions are not already been addressed in the preceding sections they are addressed here.

One submission calls for the Dublin Mountains (Hell Fire Club, Masseys Wood) planning permission to be stopped to allow for public participation. A further submission raises concerns that enforcement is not making sure developers and builders are complying with the conditions of their planning. One submission recommends tax write-offs. ([SD-C147-197, South Dublin Environmental Network](#)) ([SD-C147-141, Ross O'Mullane](#))

A further submission urges the Council to take the initiative to incorporate accessibility/universal design requirements across all its tendering processes. ([SD-C147-174, National Disability Authority](#))

One submission raises concerns relating to the 'South Dublin County Council' masterplan' in Rathcoole making particular reference to the concerns of the residents of Beechwood Lawns, Coolamber Drive, Coolamber Road and Maple Grove (BCM) area as it proposes a large car park and library on the BCM green area known as the 'three corner field'. This area is designated as a green space for the BCM estates which were built some 50 years ago. An alternate unused amenity area was proposed for car parking by BCM some years ago and continues to remain idle. [SD-C147-206, Patrick Healy](#))

A further submission raises a number of issues in regard to the Ballyfermot Area. ([SD-C147-22, Constantin Roman](#))

#### Chief Executive's Opinion

The contents of these submissions are noted. The issues raised including recommendations in relation to current legislation, tax reliefs, specific planning applications and proposals and Local Authority communication and customer care services are not within remit of the Draft Plan.

The concerns raised in regard to the Master Plan in Rathcoole and the three-corner field are noted. It should be noted that the masterplan is in draft format and the location of uses including those referenced will be subject to further review before any masterplan is finalised

Ballyfermot is not within South Dublin County Council's administrative area.

## **Chief Executive's Recommendation**

No further recommendations.

## **Development Plan Interpretation and Clarity**

### **Summary of Issues Raised**

One submission requests that Schedule 5: Definition of Use Classes & Zoning Matrix Table, 'Aparthotels' of the current Development Plan 2016-2022 be amended to include: 'for use by tourists and visitors and excludes residential use and student accommodation'. ([SD-C147-105, James McInerney Planning Consultant](#))

One submission requests that the current "Open Space" zoning status of the lands be amended to include all or some of the following uses: Camp Site, Car Park, Childcare Facilities, Conference Centre, Education, Health Centre, Housing for Older People, Office, Outdoor Entertainment Park, Residential, Restaurant/Cafe, Retirement Home and Stadium. ([SD-C147-111, Finnstown Castle Hotel](#))

One submission requests that the references to 'Liffey Valley Shopping Centre' in the Development Plan should be replaced with more general reference to 'Liffey Valley'. ([SD-C147-142, BMA PLANNING](#) )

### **Chief Executive's Opinion**

The issues raised in regard to the zoning matrix are noted. A review of same will be carried out as part of the preparation of the Draft Plan and the zoning provision. Such provisions cannot be considered at this stage in the plan making process.

The reference made to the use of the term Liffey Valley Shopping Centre relates specifically to the retail facility. However, the Liffey Valley is a physical valley subject to a SAAO and a high amenity zoning and should not be confused with the current retail and employment area. It is intended to review the retail hierarchy as part of the draft Plan preparation and the names of the different centres will need to reflect their function.

## **Chief Executive's Recommendation**

No further recommendations. A recommendation is included in the Economic and Employment section above to review the retail hierarchy as part of the preparation of the draft Plan.

## **Development Plan Procedure and Clarity**

One submission highlights a number of issues in relation to the format and layout of the current Development Plan and questions some of the headings and sub-headings used. It is suggested that the Local Authority consider following the format of the Waterford County Development Plan 2011. The submission also raise concerns regarding the use of 'seek to' and 'contribute to' in development plans generally and that the current Development Plan

fails to comply with the Planning and Development Act, the plans of adjoining counties, the Heritage Act 1995 and the National Heritage Plan. ([SD-C147-222, Keep Ireland Open](#))

One submission recommends that policies, objectives and actions should be measurable and should be ongoing and updated over the lifetime of the plan. This submission also raises concerns regarding the timeframe of the entire process as such a considerable amount of time may have lapsed from when the process of arriving at a County Development Plan was initiated to the time land zoning is enacted. Both the communities and the landscape/natural environment context may have entirely changed in the intervening time. The submission also raises concerns regarding the difference in land-use zoning and what each use class means, it calls for greater definitions of these and more emphasis on 'achieving' protection rather than 'seeking' protection.

([SD-C147-87, Deirdre Tierney](#))

One submission raises concerns that zoning of Naas Rd/Ballymount area was changed through variation whilst it should have been done through the County Development Plan process to allow engagement with stakeholders.

([SD-C147-97, BOC Gases](#) )

One submission asks what the relationship is between the new Development Plan and the Climate Action Plan and Heritage Plan. ([SD-C147-106, Green Party Tallaght](#))

One submission raises the issue that there is no guidance under the current Development Plan on what or how 'approved area plans' are formulated, and it is suggested that it is replaced with 'masterplans' to avoid certain zones becoming undeveloped / sterilised. ([SD-C147-65, Gareth Stanley](#))

One submission requests that the new Plan is written in clear plain English, as 1 in 6 Irish adults have literacy difficulties and that the Local Authority uses the 'Simply Put' approach for the next 2 stages of public consultation. ([SD-C147-96, Public Participation Network](#) )

## **Chief Executive's Opinion**

The contents of these submissions are noted. The policies and provisions in the Draft Plan will be informed and influenced by policy at national and regional level, and the appropriate use of particular terms such as 'seek to', 'seeking', 'contribute to', and 'achieving' will be considered in view of the overarching policy and provisions and the role of the Planning Authority in achieving the objective.

The Draft Plan will be prepared in accordance with the Planning and Development Act 2000 (as amended) and have due regard to the Development Plans Guidelines for Planning Authorities (2007) or subsequent guidelines as appropriate. Issues raised with regard to the timeframe for the preparation of a Development Plan are noted but outside the scope of the Local Authority.

The issue raised on the Regen Zoning on the Naas Road area is noted. This designation was carried out through Variation 3 to the current plan which was adopted on the 7<sup>th</sup> of May

2019. This process was carried out in line with the provisions of the Planning and Development Act 2000 (as amended) and included a public consultation process.

The County Development Plan sets out a strategic framework for the proper planning and sustainable development of the administrative area of the local authority, over a six-year period. The issue of Climate Action will form a key cross cutting theme for the Draft Plan which will promote policies and objectives which will support and facilitate the implementation of the provisions set out in the Climate Action Plan.

In a similar manner the Draft Plan will promote policies and objectives which will support and facilitate the delivery of actions and objectives of the Heritage Plan.

The issue raised regarding the preparation of 'approved area plans' is noted. The draft Plan will review all land use zonings and related objectives including local area plans, approved area plans and masterplans as part of the core strategy and the settlement strategy with a view to the efficient delivery of development of the lands having regard to proper planning and sustainable development.

The Local Authority is committed to prioritising social inclusion, equality of access and opportunity, and the needs of the most vulnerable people in society when designing and delivering services in accordance with South Dublin's Corporate Plan 2020-2024. However, the Draft Plan, due to its technical nature, is likely to contain some language which does not accord with 'plain english' guidance due to the legislative requirements of what must be contained in a County Development Plan and this must take precedence. However, the drafting and further consultation phases of the Plan will take account of the benefits of plain English and the 'Simply Put' approach insofar as is possible

## **Chief Executive's Recommendation**

It is considered that no further action. Recommendations in relation to the core strategy and settlement strategy have been included in the Population Growth and Housing section of the report.

## **Zoning Submissions**

### **Summary of Issues Raised**

28 no. submissions, comprising 3.3% of total written submissions received, related to a request or proposal for zoning of particular land for any purpose. Where appropriate, other issues which may have been raised in these submissions have been dealt with under the relevant strategic issue heading.

Topic	Issues Raised	% of Total
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Zoning	28	100%
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([SD-C147-45, Simon Clear & Associates, SD-C147-20, Sheila & John Trant, SD-C147-23, Hilda Childs, SD-C147-21, Jim Brown, SD-C147-26, Prisimline Ltd, Prisimline Ltd, SD-C147-104, Gibbons Associates, Gibbons& Associates, SD-C147-140, BMA PLANNING , SD-C147-111, Finnstown Castle Hotel, SD-C147-114, Finnstown Castle Hotel, SD-C147-159, Quintain Developments Ireland Limited, SD-C147-155, Kelland Homes Ltd, SD-C147-218, Hilary Boylan, SD-C147-154, Simon Clear & Associates, SD-C147-132, Eamon Brennan, SD-C147-123, John and Frank Gargan, SD-C147-223, Michael & Geraldine Carr, SD-C147-225, Paul Sweeney, SD-C147-118, Tom Phillips + Associates, SD-C147-137, Hugh McGreevy & Sons, SD-C147-109, Muirenn Duffy, SD-C147-221, Michael Bennett, SD-C147-216, Declan & Annette Hughes, SD-C147-182, Finnstown Castle Hotel, SD-C147-180, Finnstown Castle Hotel, SD-C147-153, Maplewood Residential, SD-C147-151, BMA PLANNING , SD-C147-124, Annette O Connor, SD-C147-152, John Spain Associates on behalf of Fonthill Commercial Developments Ltd, SD-C147-125, Ray and Eleanor McBennett](#))

## Chief Executive's Opinion

The Statutory provisions and procedures regarding the making of a Development Plan are set out in the Planning & Development Acts 2000 (as amended). Pursuant to section 11(2)(bc) of the Act which states , 'requests or proposals for zoning of particular land for any purpose shall not be considered at this stage', such proposals cannot be considered at this pre-draft stage of the plan preparation process.

The purpose of this stage of the development plan process is to create a framework for the proper planning and sustainable development of the county for agreement. The re-zoning of particular land should only be considered in the context of this framework and of the overall land use zoning of the County. The Planning Authority will carry out a full review of zoning as part of the preparation of the Draft Plan following this stage of strategic direction setting the framework. All zoning issues will be addressed at the draft stage, which will be subject to a further detailed public consultation process.

## Chief Executive's Recommendation

No Recommendations.

### 4.3 Chief Executive's Summary and Opinion on Submissions Relating to the Neighbourhood Areas



### 4.3.1 Citywest/Saggart/Rathcoole/Newcastle

#### Summary of Issues Raised

There were 140 issues raised in relation to Citywest/Saggart/Rathcoole/Newcastle Neighbourhood Area. A breakdown of strategic issues in this neighbourhood is set out in the table below:

Topic	Issues Raised	% of Total
Built Environment and Placemaking	14	10
Climate Action and Energy	1	0.7
Community Services	36	25.7
Economic Development and Employment	7	5
Infrastructure and Utilities	5	3.57
Natural Heritage and Biodiversity	32	22.85
Population Growth and Housing	18	12.85
Sustainable Movement	27	19.28
<b>Total</b>	<b>140</b>	<b>100%</b>

#### Built Environment and Placemaking

Submissions suggest potential for the Local Authority to promote exemplar building design and infrastructure for the urban-rural transition. A submission requests the Draft Plan to restrict building height as density can be achieved without height and promote spacious, family friendly, functional apartments which do not block light. Other submissions build on this and request the Draft Plan objectives promote better use of urban spaces and vacant lots to create better market areas, and communal green spaces. ([SD-C147-16, Rathcoole Community Council](#)), ([SD-C147-113, John Stephens](#)), ([SD-C147-212, Audrey Crone](#))

Submissions request the Draft Plan to include policy to ensure new development is directed into the centre of towns. By doing this, the policy should outline measures to protect, maintain and enhance the existing historic built environment and village character. A submission requests Saggart to be protected and designated an Architectural Conservation Area. While another seeks to restrict building height and include transitional heights in proximity to Newcastle. A submission requests development to be prohibited around the edges of towns to protect the surrounding rural areas with Green Belt policy. ([SD-C147-80, James McNerney Planning Consultant](#)), ([SD-C147-212, Audrey Crone](#)), ([SD-C147-105, James McNerney Planning Consultant](#))

A submission requests the Draft Plan to separate Newcastle from the Citywest/Saggart/Rathcoole/Newcastle Neighbourhood due to the segregation of the N7/M7 ([SD-C147-80, James McNerney Planning Consultant](#))

A submission outlines that Newcastle has a lack of retail provision and presently suffers from a lack of facilities without a basic play area for young children and the placemaking envisaged under the LAP has not taken place. Requests that more emphasis is needed in the new Draft Plan for the provision of recreational and community facilities in tandem with new housing.



It is further requested that a Specific Local Objectives for Newcastle in relation to building height is applied, limiting inappropriate development, the provision of commercial, recreational and community services and the establishment of a Historic/Cultural quarter at the west end. ([SD-C147-80, James McInerney Planning Consultant](#)), ([SD-C147-105, James McInerney, James McInerney Planning Consultant](#))

The submission highlights that placemaking requires an active communication plan with relevant stakeholders and the residents of Citywest to facilitate 'community planning'. ([SD-C147-90, Marie Petiet](#))

The submission notes that LC zoning and the protection of Village Centres must be a consideration in a planning assessment in conjunction with impacts on traffic and provision of community facilities. ([SD-C147-176, Lynn Tierney, Saggart Village Residents' Association](#))

## Climate Action and Energy

The submission requests that Rathcoole Woodlands be incorporated into the SDCC Development Climate Change Action Plan, as a Nature-Based Solution. ([SD-C147-127, Sally Graver](#))

## Community Services

Submissions expressed a need for community facilities in this neighbourhood. A list of community facilities outlined under the different submissions include: Garda Station, library, primary and secondary schools, community centres, public open space, creches, sports club and pitches, spaces for kids, teens and adults of all ages, space for community events, medical facilities, basketball courts, bmx/scooter ramps, running and cycle tracks, and a scout hall. The central theme across the submissions is to ensure the provision of community facilities caters for existing and future populations in the neighbourhood.

Another submission requests that further development should stop until community facilities and transport infrastructure are in place for future populations and should be provided by the Local Authority and not developer led. There are submissions which welcome the investment by the Local Authority in the Saggart Community Centre.

([SD-C147-12, venkata subhash babu medisetty](#) [SD-C147-19, Joanne Fitzpatrick](#)), ([SD-C147-10, Karen Keatinge](#)), ([SD-C147-10, Karen Keatinge](#)), ([SD-C147-13, Lema Lo](#)), ([SD-C147-32, Tracy Walsh](#)), ([SD-C147-32, Tracy Walsh](#)), ([SD-C147-42, Deirdre McMullan McMullan](#)), ([SD-C147-98, Kar Kin Lim](#)), ([SD-C147-54, Fergal Britton, ReNewcastle Community Group](#)), ([SD-C147-54, Fergal Britton, ReNewcastle Community Group](#)), ([SD-C147-54, Fergal Britton, ReNewcastle Community Group](#)), ([SD-C147-3, Alison Sheppard](#)), ([SD-C147-71, Kemi Obi](#)), ([SD-C147-196, Paul Kelly](#)), ([SD-C147-100, Olive O'Malley](#)), ([SD-C147-70, Rachel O'Callaghan](#)), ([SD-C147-70, Rachel O'Callaghan](#)), ([SD-C147-8, Amanda Higgins](#)), ([SD-C147-11, Asa holmstrom holmstrom](#)), ([SD-C147-209, jon norton](#)), ([SD-C147-56, Paul Murphy](#)), ([SD-C147-74, Hugh Durkin](#)), ([SD-C147-212, Audrey Crone](#)), ([SD-C147-105, James McInerney, James McInerney Planning Consultant](#)), ([SD-C147-105, James McInerney, James McInerney Planning Consultant](#)), ([SD-C147-90, Marie Petiet](#)), ([SD-C147-90, Marie Petiet](#)), ([SD-C147-90, Marie Petiet](#)), ([SD-C147-90, Marie Petiet](#)), ([SD-C147-176, Lynn Tierney, Saggart Village Residents' Association](#)), ([SD-C147-195, Mairéad](#)

[O'Connor](#)), ([SD-C147-168, Lynn Tierney, Saggart Village Residents' Association](#) ), ([SD-C147-168, Lynn Tierney, Saggart Village Residents' Association](#) ),([SD-C147-54, Fergal Britton, ReNewcastle Community Group](#)), ([SD-C147-176, Lynn Tierney, Saggart Village Residents' Association](#) ), ([SD-C147-168, Lynn Tierney, Saggart Village Residents' Association](#) ), ([SD-C147-195, Mairéad O'Connor](#)),

## **Economic Development and Employment**

The submissions highlight tourist and recreational opportunities. A submission requests the Local Authority to take in charge the Swiftbrook Mill to form part of the proposed Greenway Slade Castle to Brittas of the 2015-2020 tourist strategy. It is suggested that the Mill presents a great opportunity to create a historical and community hub and museum detailing the works that went on during the years it was in operation and with linkages to the greenway would also be an amenity to walkers and students. Another submission requests the Local Authority to harness funds for projects to re-use the old courthouse building in Rathcoole as an exhibition centre, café and tourist info desk. A submission requests the Draft Plan to preserve community plans for a Greenway between Rathcoole Park and Slade Valley walk. ([SD-C147-16, Rathcoole Community Council](#)), ([SD-C147-168, Saggart Village Residents' Association](#) ), ([SD-C147-48, Sue Dorgan, Millrace Residents association \(MRA\)](#))

The submission highlights the need to expand Citywest Shopping Centre retail offer instead of the proliferation of fast food takeaways and associated littering and loitering ([SD-C147-32, Tracy Walsh](#)), ([SD-C147-90, Marie Petiet](#))

The submission requests the Draft plan to encourage and support the continued development of Greenogue Business Park into adjoining greenfield land and opportunities for office space and business hubs in Newcastle and Rathcoole towns. ([SD-C147-74, Hugh Durkin](#))

## **Infrastructure and Utilities**

The submissions express a need for waste bins and bottle bank facilities and additional public lighting. ([SD-C147-32, Tracy Walsh](#)), ([SD-C147-176, Saggart Village Residents' Association](#) )

The submissions highlight that recently built housing estates in Rathcoole have put enormous pressure on roads and infrastructure which are prejudicing future development. It is essential that national infrastructure providers support the Council in the growth of sustainable centres like Newcastle and Rathcoole ([SD-C147-16, Rathcoole Community Council](#)), ([SD-C147-74, Hugh Durkin](#))

The submission requests a Specific Local Objective in the Draft Plan at The Old Glebe relating to the fresh water source. This is sought in order to secure the preservation and protection of the ornamental pond at the rear of The Old Glebe, Main Street, Newcastle, Co. Dublin, a protected structure, by the separation of the fresh water source from the existing surface water disposal system. ([SD-C147-50, James McNerney, James McNerney Planning Consultant](#))

Issues around drainage/flooding and protecting rivers were raised in the submissions. These include the request for the Council to examine surface water run-off causing flooding in

Saggart village and; to identify, protect and preserve through objectives the remaining section of unculverted first order streams in the upper catchments of the Griffeen and Camac near Rathcoole to ensure their function and maintain their catchment connectivity. ([SD-C147-212, Audrey Crone](#)), ([SD-C147-86, Eimear Healy, Four Districts Woodland Habitat Group](#)), ([SD-C147-99, Ne Graver](#))

A further submission highlights that Rathcoole Village has serious sewage capacity issues that require attention prior to consideration of any additional housing units. This development will feed through the existing sewage network and the Tay Lane pumping station is already at capacity. ([SD-C147-206, Patrick Healy](#))

## **Natural Heritage and Biodiversity**

The submissions highlight the importance of Rathcoole Woodlands to the local community and emphasise that the development of housing on the woodlands would be a loss to the community. It is also put forward that the proposed development of the woodland area will result in the destruction of a flood plain as it is primarily wetland which provides flooding protection to the surrounding areas. A number of submissions suggest that the woodlands should be incorporated into Rathcoole Park. Various designations, including SAAO, Nature Reserve and nomination as a SAC or pNHA, are proposed for the woodlands to give them increased protection as a native woodland. Other natural assets of importance outlined in submissions include: People's Park, Three Corner Field and Burgage fields & hedgerows all part of the wider ecological network in the area. The general request from submissions is to protect these assets through designations / objectives in the Development Plan and ensure such assets form part of the Green Infrastructure Strategy for the area. ([SD-C147-66, Jennifer Hannon](#) [SD-C147-91, John O'Leary, Beechwood Lawns Coolamber and Maple Residents Association](#)), ([SD-C147-93, Susan Healy](#)), ([SD-C147-196, Paul Kelly](#)), ([SD-C147-72, Fiadh Ní Dhonnchadha](#)), ([SD-C147-197, christine Barretto, South Dublin Environmental Network](#)), ([SD-C147-183, AIDAN doyle](#)), ([SD-C147-43, Orla Daly](#)), ([SD-C147-212, Audrey Crone](#)), ([SD-C147-99, Ne Graver](#)), ([SD-C147-99, Ne Graver](#)), ([SD-C147-99, Ne Graver](#)), ([SD-C147-86, Eimear Healy, Four Districts Woodland Habitat Group](#)), ([SD-C147-127, Sally Graver](#)), ([SD-C147-127, Sally Graver](#)), ([SD-C147-127, Sally Graver](#)), ([SD-C147-127, Sally Graver](#)), ([SD-C147-162, Sue Dorgan, Millrace Residents association \(MRA\)](#)), ([SD-C147-120, Annie Flynn, Four Districts Wild Habitat Group](#)), ([SD-C147-190, Eoin Ó Broin](#)), ([SD-C147-209, jon norton](#)), ([SD-C147-86, Eimear Healy, Four Districts Woodland Habitat Group](#)), ([SD-C147-99, Ne Graver](#)), ([SD-C147-127, Sally Graver](#)),

Other submissions relate to the potential to unlock nature-based trials south of Saggart / Rathcoole. To incorporate the Old Paper Mill and ponds in Saggart into any plans for a heritage trail and ensure its preservation and promotion as a site of historical significance and interest to both residents and visitors, with the potential for a visitors site with café / shop amenities. The Lugg Wood on the south eastern side of Slade Valley should be developed as a park amenity for people to enjoy the views, picnic, and walk in the woods. ([SD-C147-176, Lynn Tierney, Saggart Village Residents' Association](#) ), ([SD-C147-168, Lynn Tierney, Saggart Village Residents' Association](#) ), ([SD-C147-16, Alan Fairman, Rathcoole Community Council](#))

The submission requests policies to ensure new development addresses existing historic built environment and that green belts should be introduced around the villages of Newcastle, Rathcoole and Saggart, nearby business Parks and the N7 to retain their identity within rural surroundings. ([SD-C147-105, James McNerney, James McNerney Planning Consultant](#))

## Population Growth and Housing

A number of submissions highlight that the pattern for development around towns must be balanced and changed from back land development sprawl to encouraging brownfield infill along the heart of the historic main street to protect biodiversity and deliver an efficient public transport and energy network. The submissions request that a Local Area Plan is prepared for Rathcoole and Saggart that takes cognisance of all relevant spatial and economic attributes and that the area should be a gateway town for tourist, recreational and employment based potential which maximises the areas proximity to the rural hinterland

. ([SD-C147-16, Alan Fairman, Rathcoole Community Council](#)), ([SD-C147-16, Alan Fairman, Rathcoole Community Council](#)), ([SD-C147-196, Paul Kelly](#)) , ([SD-C147-16, Alan Fairman, Rathcoole Community Council](#)), ([SD-C147-99, Ne Graver](#)) ([SD-C147-196, Paul Kelly](#)), ([SD-C147-87, Deirdre tierney](#)), ([SD-C147-74, Hugh Durkin](#))

The submissions highlight the need for ongoing growth in residential development of well-connected greenfield sites in Citywest and the wider Neighbourhood, including Kingswood, given the high levels of employment at nearby centres. ([SD-C147-75, Hugh Durkin Nigel Smith](#)), ([SD-C147-179, Development 8, Development 8](#))

The submissions highlight that Newcastle has a higher concentration of social housing compared with other areas. Build to Rent apartments make it difficult to create vibrant communities and that the neighbourhood concept is positive, but Rathcoole/Newcastle should be separate as they are not major growth nodes. ([SD-C147-98, Kar Kin Lim](#)),([SD-C147-54, ReNewcastle Community Group](#)), ([SD-C147-87, Deirdre tierney](#))

The submissions highlight the importance of providing appropriate housing for the ageing population to accommodate downsizing and promote intergenerational accommodation in local areas, are part of programs / strategy in partnership with key stakeholders. ([SD-C147-69, Ne Graver](#)), ([SD-C147-69, Ne Graver](#))

Submissions have highlighted the need for further zoned land for housing in Rathcoole to meet the population target for 2022 with another submission requesting that population targets should not be capped for Newcastle and Rathcoole to allow for market demand for countryside living following the onset of Covid-19. Another submission highlights Rathcoole is a hub for significant economic activity (tourism, recreational and employment) and should be considered a gateway town and not a suburb town of Dublin. On the other hand, a submission requests that Rathcoole / Newcastle should be preserved as small towns with no further development and designate Brittas as a 'village' to establish a rural centre with

facilities and infrastructure. ([SD-C147-65, Gareth Stanley](#)), ([SD-C147-74, Hugh Durkin](#)), ([SD-C147-87, Deirdre Tierney](#)), ([SD-C147-16, Alan Fairman, Rathcoole Community Council](#))

The submissions seek to protect and maintain the zoning of Saggart Village as a village which is cognisant of older housing and that any new planning applications or SHDs take the village zoning into consideration and provide a mix of housing types and availability of existing adequate community services and parking availability ([SD-C147-168, Lynn Tierney, Saggart Village Residents' Association](#)), ([SD-C147-90, Marie Petiet](#))

## **Sustainable Movement**

Submissions highlight that there is limited public transport infrastructure for the new housing, in particular in Newcastle. It is requested that the Draft Plan consider safe sustainable transport and infrastructure options to Hazelhatch train station, Saggart Luas stop, shopping centres and schools/universities from Newcastle Village to tackle climate change. Another submission highlights overcrowding on the Luas at peak times and indicates that the bus service has been reduced in the area. It is also suggested that a Greenway link to Rathcoole and to Hazelhatch and the Canal would be hugely beneficial. ([SD-C147-15, Tony O'Hara](#)), ([SD-C147-56, Paul Murphy](#)), ([SD-C147-209, Jon Norton](#)), ([SD-C147-105, James McNerney Planning Consultant](#)), ([SD-C147-64, Emma Flanagan, Cairn PLC](#)), ([SD-C147-168, Lynn Tierney, Saggart Village Residents' Association](#)), ([SD-C147-90, Marie Petiet](#)) ([SD-C147-54, Fergal Britton, ReNewcastle Community Group](#))

The submissions request the Draft Plan consider traffic management plans for Saggart and Newcastle, to manage school drop-off and collections which incorporates traffic calming measures prioritising safe cycle and walk-to-school routes. ([SD-C147-212, Audrey Crone](#)), ([SD-C147-209, Jon Norton](#)), ([SD-C147-176, Lynn Tierney, Saggart Village Residents' Association](#)), ([SD-C147-168, Lynn Tierney, Saggart Village Residents' Association](#)), ([SD-C147-105, James McNerney, James McNerney Planning Consultant](#))

It is requested that the Draft Plan consider public transport improvements for the neighbourhood with a submission making particular reference to Citywest, due to the large increase in population highlighting that this will bring Citywest traffic to a halt. A submission outlines a list of cycle infrastructure and the maintenance of same for the area. Another submission highlights that traffic congestion will increase when the Boherboy and Magna sites are developed and should be reconsidered. ([SD-C147-70, Rachel O'Callaghan](#)), ([SD-C147-168, Saggart Village Residents' Association](#)), ([SD-C147-179, Development 8, Development 8](#))

Submissions outline the serious traffic congestion in Rathcoole caused by increased levels of development and the fact that all traffic has to use the Main Street. It is suggested that this will only worsen as large industrial development under construction is built out causing health and safety issues. It is requested that the Draft Plan includes an objective for the flyover/N7 inbound exit to divert traffic away from main Street Rathcoole and a Rathcoole / Saggart village bypass in order to promote walking and cycling ([SD-C147-72, Fiadh Ní Dhonnchadha](#)), ([SD-C147-176, Saggart Village Residents' Association](#)), ([SD-C147-176, Lynn Tierney, Saggart Village Residents' Association](#)), ([SD-C147-168, Saggart Village Residents' Association](#)); ([SD-C147-206, Patrick Healy](#))

It is requested that the Draft Plan includes road and sustainable transport infrastructure for Newcastle, including: a road bypass before any further development takes place in the LAP area, traffic calming measures for the main street, delivery of the Western Dublin Orbital Route north of the N7, and the prioritisation of a bus service, as part of BusConnects. A Greenway route connecting Newcastle Village with nearby heavy and light rail stops and Tallaght is also called for. ([SD-C147-80, James McInerney Planning Consultant](#)), ([SD-C147-90, Marie Petiet](#)), ([SD-C147-195, Mairéad O'Connor](#))

Submissions request the Draft Plan include car and school bus parking standards when planning for schools and create public transports links with Saggart and main colleges (incl. Maynooth, DCU and UCD) ([SD-C147-176, Saggart Village Residents' Association](#)), ([SD-C147-168, , Saggart Village Residents' Association](#))

Submissions request the Draft Plan consider footpaths between Newcastle and Hazelhatch train station, footpath on Castle Road up to the Nursing home, additional paths along Garter Lane towards the Business Campus and the Luas. One submission requests a ban on construction HGVs using small village main streets ([SD-C147-195, Mairéad O'Connor](#)), ([SD-C147-176, Saggart Village Residents' Association](#))

There were requests for additional public lighting, widening and provision of footpaths along Garter lane towards the Saggart Luas and nearby Nursing Homes. ([SD-C147-168, ,](#)) ([SD-C147-176, Lynn Tierney, Saggart Village Residents' Association](#))

## 4.2 Chief Executive's Opinion

The submissions raised on Built Environment and Placemaking are acknowledged. The protection and enhancement of historic main streets in Saggart/ Rathcoole and Newcastle is recognised as an important element of placemaking and enhancing the sense of place. National and Regional policy promotes compact growth to focus development into our main streets presenting opportunities to examine our urban settings to add value and create more attractive places in which people can live, work and invest. Housing choice is an important factor in creating compact cities, towns and villages. Striking the balance between new and historic buildings will form a key part of the policy consideration for the Draft Plan guided by a review of on building height and density policy.

The submissions on Climate Action and Energy are acknowledged. In line with the adoption of South Dublin's Climate Action Plan 2019-2024 and the Climate Action and Low Carbon Development (Amendment) Bill 2020 that requires Ireland to be Carbon Neutral by 2050, the Draft Plan will include and facilitate measures to becoming low carbon as we transition to the 2050 carbon neutral targets. The draft Plan should include policy and objective in the area of energy efficiency, renewable energy, a modal shift towards public transport and active travel at County and neighbourhood level. The compact growth model of development will assist in transitioning to a low carbon economy and society.

The significant number of issues raised Community Services are acknowledged. The preparation of the Draft Plan will include a social infrastructure audit for each neighbourhood reviewing the existing and future requirements for facilities. The outcomes of the audit will inform policies of the Draft Plan and when adopted, the policies and objectives of the 'Local Economic and Community Plan' (LECP). Some of the services



outlined as being required are not within the remit of the Council to deliver, for example, Garda Stations and medical facilities. However, the Development Plan should include policy to facilitate such development and the Council will work with service providers to the greatest extent possible. The Planning Department is currently liaising with the developers in Citywest to bring forward the delivery of a community centre.

The submissions on Economic Development and Employment are acknowledged. The Draft Plan will seek to build on the policies and objectives contained in the current Plan with a view to strengthening the County's economic competitiveness and attractiveness. The value of tourism to the County's economy is recognised as are the County's substantial natural and built assets. The draft Plan should continue to include policy to promote and facilitate the South Dublin Tourism Strategy. A review of the current policy and objectives as they relate to employment and the economy is being undertaken as part of the draft Plan preparation process. This will include a review of the quantum, capacity and location of zoned employment lands.

The submissions on Infrastructure and Utilities are acknowledged. The Draft Plan will build on the policies and objectives contained within the current Plan, working with key stakeholders to deliver associated infrastructure in tandem with housing and employment. The Draft Plan will include an Infrastructural Assessment which examines the infrastructure requirements (roads, drainage, open space, etc) for zoned sites across the various settlements. The outcome of this assessment will inform the core strategy and settlement strategy of the draft Plan.

The submissions on Natural Heritage and Biodiversity are acknowledged. A Green Infrastructure Strategy is currently being prepared as an integral part of the preparation of the Draft Plan. The Draft Plan should include policy to identify and extend the green infrastructure network where this has been identified through the GI strategy. A number of designations have been suggested for Rathcoole woodlands, many of these designations, such as pNHA and SACs are outside the Council's remit. Policy should be included in the draft Plan which reflect the objectives of the National Biodiversity Action Plan 2017-2021.. The inclusion of a zoning designation for Greenbelts will be explored as part of the review of the current development plan.

The submissions on Population Growth and Housing are acknowledged. The Draft Plan will incorporate a core strategy including a settlement strategy and housing strategy which will set out an evidence-based rationale for developing each settlement in line with National and Regional Policy context. The draft Plan should include policy which facilitates downsizing and housing for older people.

The issues raised in relation to Sustainable Movement are acknowledged. The Council will promote active travel (cycling and walking) and improved public transport provision in co-ordination with various stakeholders, including the National Transport Authority (NTA), Transport Infrastructure Ireland (TII) and Dublin Bus. As part of the preparation of the draft plan a mobility study is being carried out in conjunction with the NTA. The NTA have examined the overall bus network under BusConnects with plans to enhance the connection

in the Neighbourhood between settlements, surrounding employment, education, and light and heavy rail lines.

Policy on sustainable movement measures will be carried out in line with the NTAs 'Transport Strategy for Greater Dublin Area 2016 – 2035' and the delivery of the Metropolitan Cycle Network set out in the Greater Dublin Area Cycle Network Plan which aims to improve cycling in the County, throughout the lifetime of the plan. In this regard, Cycle South Dublin will ensure the delivery of a number of cycle routes within the County. The submissions outlining traffic congestion issues are noted. The draft Plan will review the road proposals in the current 2016-2022 Development Plan and revise where appropriate. Regard also must be had to the National Development Plan 2018-2027 and the Greater Dublin Area Transport Strategy where national and regional road investment and proposals are set out. The Draft Plan policies and provisions will be consistent with the Transport Strategy for Greater Dublin Area 2016 – 2035 the 'National Planning Framework 'Project 2040', Transport Strategy for Greater Dublin Area 2016-2035, National Development Plan 2018-2027 and Smarter Travel-A Sustainable Transport Future 2009-2020 in relation to transport needs for South Dublin.

### **4.3 Chief Executive's Recommendation**

Strategic recommendations for this neighbourhood area have been addressed under each key strategic issue in section 4.2 above and Part 3 of this report.



## 4.3.2 Clondalkin/Clonburris/Grangecastle

### Summary of Issues Raised

There were 30 issues raised in relation to Clondalkin/Clonburris/Grangecastle Neighbourhood Area. A breakdown of strategic issues in this neighbourhood is set out in the table below:

Topic	Issues Raised	% of Total
Built Environment & Placemaking	13	43.3%
Climate Action & Energy	1	3.3%
Community Services	3	10%
Economic Development & Employment	3	10%
Infrastructure & Utilities	2	6.6%
Natural Heritage & Biodiversity	2	6.6%
Population Growth & Housing	1	3.3%
Sustainable Movement	5	16.6%
Total	30	100%

#### Built Environment & Placemaking

A number of submissions deal with the Mill Centre in Clondalkin village, one submission asking for the provision of a new urban space between both the Mill Centre and Clondalkin Village. Another submission asked for the Clondalkin Mill Ponds be taken into public ownership ([SD-C147-25, Thomas Gallagher](#), [SD-C147-190, Eoin Ó Broin](#)).

One submission related to height restrictions in Clondalkin Village for to new apartments. The regeneration of Watery Lane was welcomed once overdevelopment does not occur. Considers 5-6 storey buildings to be inappropriate to the look and atmosphere of the village. This submission also asks for more engagement from elected members in the planning process. ([SD-C147-33, Matthew Lysaght](#)).

While welcoming the interpretative centre at the Round Tower, the submission raises concerns around the preservation of culture and heritage in Clondalkin Village, as well as the protection of the Irish language throughout the county. This submission also requests limiting fast food provision within Clondalkin. ([SD-C147-193, Tom & Chris Coleman](#)).

One submission calls for a preservation of Clondalkin, with a non-development buffer surrounding the village. ([SD-C147-77, Thomas Finlay](#)).

One submission asks for litter wardens, dog wardens, parking wardens and security along the Canal and Corkagh park. ([SD-C147-207, Monica McGill](#)).

A submission highlights that there is fear around the development of apartments replacing houses in Clondalkin Village. This submission also supports the council's work already within

Clondalkin village and welcomes further engagement in the future ([SD-C147-113, John Stephens](#)).

One submission asks for better security in Housing estates of Clondalkin ([SD-C147-82, Declan Hanley](#)).

One submission requests that the ACA in Clondalkin village be reviewed and consider the incorporation of a number of different sites as well as securing the protection of St Cuthbert's medieval church with installation of lighting. The submission goes on to state that an activity centre be provided at the Lock House and that Clondalkin Village is pedestrianised with benches and public toilets installed. ([SD-C147-190, Eoin Ó Broin](#))

### **Climate Action & Energy**

The submission suggests that sustainability will be a key feature in the development plan and promotes a focus on investment in clean energy, walking and cycling, a reduction in waste services and recycling/upcycling facilities. ([SD-C147-193, Tom & Chris Coleman](#))

### **Community Services**

This submission relates to a list of topics which should be considered as part of the new CDP. These include green open spaces, monastic garden, pony & horse clubs for young people, amenities promised for older people, dog pound, animal rescue and puppy farms. ([SD-C147-207, Monica McGill](#))

This submission calls for the Council to develop St Culbert's Park, highlighting the need for a playground in the park. ([SD-C147-192, Clondalkin Celtic FC](#))

A submission looks for more amenities for teenagers, both outdoors and at a community level. Further amenities for all ages which could be provided include a theatre, boule/pentang courts and artist studios. ([SD-C147-190, Eoin Ó Broin](#))

### **Economic Development & Employment**

A submission suggests additional height provision at Clonburris Station and lands along the rail line. It is also suggested that policies should reflect the changing nature of retail, to inform future changes to the SDZ scheme at Clonburris. ([SD-C147-64, Emma Flanagan, Cairn PLC](#))

This submission states that Rowlagh and Neilstown should be looked at within the Draft Plan regarding retail ([SD-C147-213, Shane Moynihan](#)).

A submission has requested that the Specific Local Objective (SLO) relating to the Wilson's Auctions premises be updated within the forthcoming Development Plan to reflect the established nature of the Wilson's Auctions operations on the site and to facilitate the ongoing operation of the Wilsons business, namely replacing 'at the Former Interbloem Premises' with 'at the Wilson's Auctions Premises (c.7.7ha)'. The submission also requests a rezoning of site to Enterprise and Employment. ([SD-C147-140, BMA PLANNING](#))

## **Infrastructure & Utilities**

This submission requests that tree planting along the Naas Road would deal with noise from the road. ([SD-C147-102, Niall Charleton](#)).

A submission relates to a list of topics which should be considered as part of the new CDP. These include drinking water standards and provision, air condition standards, voting and polling stations and postal voting. ([SD-C147-207, Monica McGill](#))

## **Natural Heritage & Biodiversity**

A submission relates to a list of topics which should be considered as part of the new CDP for both natural and built heritage and biodiversity. The submission highlights the following: 'Old Heritage'- Architectural Conservation Areas, built heritage, ancient roadway(s), old street furniture, SDCC naming policy and practices, Irish language, shop-front signage, character of Clondalkin, shop premises and liaise with local groups and 'New Heritage' – requiring support for new people moving into the area.

The submission goes on to highlight the following regarding natural Environment: trees, tree protection orders, conserving and maintaining waterways, wildlife protection, cruelty to animals, liaise with local groups. ([SD-C147-207, Monica McGill](#))

## **Population Growth & Housing**

This submission relates to a list of topics which should be considered as part of the new CDP. These include infill building projects, boardwalk, new builds, developers' fees, planning permissions and problems connected with them, liaise with local groups, 'bottom-up' rather than 'top-down' approach. ([SD-C147-207, Monica McGill](#))

## **Sustainable Movement**

This submission notes that the road infrastructure can barely accommodate existing traffic levels at the junction of Watery Lane and Orchard Road. ([SD-C147-33, Matthew Lysaght](#))

This submission asks for an extension of the LUAS line to Clondalkin/Lucan or the creation of a new line. ([SD-C147-100, Olive O'Malley](#))

This submission relates to issues with cycling within this neighbourhood, including bad lighting which discourages cycling along the greenway at the Canal, the need to open Kishogue Railway Station to encourage cycling, securing bike parking and developing cycling infrastructure in Clonburris which will reduce the need for cars. The submission also requests more cycle and pedestrian access to Kilcarbery as well as an off-road cycle link to Clondalkin Village. ([SD-C147-35, Dublin Cycling Campaign](#))

This submission relates to a list of topics which should be considered as part of the new CDP. These include street signage, street lighting, care of roadside drains and drainage, official ban on political posters in Clondalkin village area, changes to traffic flow. ([SD-C147-207, Monica McGill](#))

A submission would like to see the cycleway along the banks of the Camac from Clondalkin village to the Grand Canal developed in the lifetime of this plan. ([SD-C147-49, Niall Charleton](#))

A submission calls for SDCC to promote walking school buses to reduce traffic in areas such as Clondalkin village. [SD-C147-187, Su Murray](#)

## **Chief Executive's Opinion**

The issues raised under the various strategic themes are acknowledged. Consultants have been engaged to review height and density policy across the County. The draft Plan will have to ensure compliance with national policy and guidelines, and it is noted that the OPR has raised the issue that the current 2016-2022 Development Plan is not consistent with these guidelines.

The importance of the built heritage of the villages within the County including Clondalkin is acknowledged. The existing Architectural Conservation Area (ACA) in Clondalkin was fully considered as part of the preparation of the 2016-2022 Development Plan and aims to protect historic and cultural buildings within the village. The implementation of the policies related to ACAs and protected structures will add value to these assets and the villages in which they are designated creating more attractive places in which people can live and work. The Draft Plan will review existing policy in relation to the preservation and enhancement of the historical character and the visual setting of Architectural Conservation Areas, and consider any proposals requesting changes to the ACAs.

The adequate supply of housing with a choice of house type and size is critical to the growth of the County. It is important that policy and objectives ensure that these developments occur in a sensitive manner taking into account the architectural heritage of Clondalkin and other villages.

The submission raised with regards to Climate Action and Energy is acknowledged. The adoption of SDCC's Climate Action Plan 2019-2024 and the Climate Action and Low Carbon Development (Amendment) Bill 2020 require Ireland to be Carbon Neutral by 2050. The draft Plan should include policies which will contribute to the low carbon economy, increase energy efficiency and promote renewable energy.

It is noted also that a Green Infrastructure Strategy is being prepared for the County in tandem with the County Development Plan which will support the delivery of more connectivity across the County, allow for natural solutions to respond to the need to be more climate resilient and complement place making within the County.

Submissions which request the improvement of Community Services in the County are acknowledged. It is noted that the 'Local Economic and Community Plan' (LECP), contains measures to promote and support community and economic development in the County, with one of its key goals being 'Delivery of Community Facilities'. The Draft Plan will seek to include objectives which will support the delivery of these objectives of the LECP.

The concerns raised in submissions around Economic Development and Employment are acknowledged. The Draft Plan will review and strengthen existing policy and objectives to improve the County's economic competitiveness. In particular, policies and objectives relating to the delivery of housing, infrastructure and environmental protection should seek to retain and enhance the attractiveness of the County as a place within which to live, work or invest. The consolidation and sustainability of existing centres will be a factor to the long-term viability of the County.

The Draft Plan will review the existing retail hierarchy and will seek to include objectives and policies which support retail development across the County. It is noted that amendments to Clonburris SDZ are not within the remit of the Draft Plan, any changes to existing SDZ's go through a separate process of approval with An Bord Pleanála.

The issues raised in relation to Infrastructure and Utilities are acknowledged. Policies and objectives relating to tree planting will be addressed within the County's Green Infrastructure Strategy, which is being prepared in tandem with the County Development Plan. The issues raised in relation to drinking water standards and provision, air condition standards, voting and polling stations and postal voting are not matters for the development plan.

Submissions relating to Natural Heritage and Biodiversity are acknowledged. As stated above, a Green Infrastructure Strategy is currently being prepared in tandem with the County Development Plan. The integration of this strategy with the draft plan will ensure that policies and objectives to help protect and extend the green network throughout the County will be carefully considered. This will include ways to optimise green infrastructure within towns and villages such as Clondalkin.

The issues raised regarding population growth and housing are acknowledged. The Draft Plan will include a review of the Core Strategy and related settlement and housing strategies. The plan will include a review of Development Management standards.

The issues raised in relation to Sustainable Movement are acknowledged. In the context of Clondalkin, Clonburris and Grange Castle it is highlighted that the Council will continue in the Draft Plan as in previous plans to include policies and objectives to further develop and enhance cycling infrastructure throughout the county. The Draft Plan will support the delivery of the 'National Cycle Policy Framework 2009-2020'. Its aim is to improve cycling infrastructure in the County, throughout the lifetime of the plan. The recent Cycle South Dublin programme for cycling infrastructure within the County will deliver on this framework. The Draft Plan will include policies and objectives which will support the delivery of the 'National Planning Framework 'Project 2040', Transport Strategy for Greater Dublin Area 2014-2035, National Development Plan 2018-2027 and Smarter Travel-A Sustainable Transport Future 2009-2020 in relation to transport needs in the county.

The policies and objectives of the Plan will continue to support the delivery of the Lucan LUAS (linking Lucan, Liffey Valley and the City centre) and other national and regional projects identified in the NTAs Transport Strategy for the Greater Dublin Area.

## **Chief Executive's Recommendation**

Strategic recommendations for the neighbourhood areas are included in the relevant strategic issue in section 4.2 and Part 3 of this report.

### 4.3.3 Lucan/Palmerstown/Adamstown

#### Summary of Issues Raised

There were 34 issues raised in relation to Lucan/Palmerstown/Adamstown. A breakdown of strategic issues in this neighbourhood can be seen under the table below:

Topic	No. of Issues	% of Total
Built Environment and Placemaking	6	17.65%
Climate Action and Energy	1	2.94%
Population Growth and Housing	3	8.82%
Sustainable Movement	10	29.41%
Community Services	4	11.76%
Economic Development and Employment	4	11.76%
Natural Heritage and Biodiversity	5	14.71%
Infrastructure and Utilities	1	2.94%
Total	34	100%

#### Built Environment and Placemaking

Submissions have been received which relate to the Palmerstown Village area, calling for the plan to ensure the traditional village character is retained by restricting building heights and ensuring high quality design.

It is also suggested that no further development should occur in this area until an interchange is in place at Lower Kennelsfort/R148 junction and that the Palmerstown ACA is extended to include all homes and businesses over 100 years in the Village Area, including all stone walls in Mill Lane and surrounding areas i.e. entrance to Old Church Mill Lane. ([SD-C147-40, Alan Creaner](#))([SD-C147-124, Annette O Connor](#))

A further submission calls for the preservation of all historic and heritage villages from over-development within this Neighbourhood Area. ([SD-C147-213, Shane Moynihan](#))

A number of submissions have outlined disappointment that there has been no mention of the restoration of Silver Bridge in the issues papers. ([SD-C147-130, Glenn Johnston](#)) ([SD-C147-68, Robert Shevlin](#)) ([SD-C147-129, Ger O'Halloran](#))

A submission highlights that Adamstown is a fine example of delivering a compact pattern of growth, through increased density and high-quality design married with protecting the built heritage, providing a mix of land uses and sustainable transport modes which go towards creating positive built environments and attractive places to live and work. ([SD-C147-166, Castlethorn](#))

A submission highlights that Weston is an historic airfield founded and operational since the 1930s which pre-dates Dublin Airport and that it is an irreplaceable element of Irish transport heritage comprising the aerodrome buildings integral to the local and wider aviation community and open space of the airfield enhancing the setting for the surrounding built and natural environment. ([SD-C147-76, National Flight Centre](#))

### **Climate Action and Energy**

A submission highlights the County should aspire to becoming a low carbon county by increasing energy efficiencies and promotion of renewable energy potential. The Draft Plan should build upon existing energy and climate action policies, by facilitating ease of access to employment zoned lands by active modes of travel. ([SD-C147-166, Castlethorn](#))

### **Population Growth and Housing**

A submission considers that there is an opportunity to extend Adamstown SDZ along the western rail corridor as a strategic and sustainable 'Metropolitan Consolidation Town' given the level of infrastructure (existing and proposed public transport links) available to facilitate development.

It is also highlighted that Adamstown is located close to the strategic employment area of Grange Castle, which is identified as an area for potential employment development in the NPF and RSES and is bolstered by good sustainable modes of transport linkages. ([SD-C147-166, Castlethorn](#))

A further submission identifies that the agricultural lands adjacent and to the west of Adamstown, at Aderrig and Tobermaclugg, which are situated on the Dublin - Kildare rail line, are a highly suitable location to accommodate future population growth and housing needs of the County. The submission considers that an extension to the SDZ lands would align with National Planning Policy and the RSES which promotes the integration of land use and public transportation, consolidation of growth within the metropolitan area of the GDA, adherence to the sequential approach to land use zoning as specifically identified in the South-West Corridor, along the Hazelhatch / Celbridge to Dublin line, as a suitable location to cater for future growth within the Metropolitan Area. ([SD-C147-137, Hugh McGreevy & Sons](#))

A submission has called for the Draft Plan to consider the need for residential and other uses in combination with a strong employment base at Liffey Valley Shopping Centre to accommodate a projected population and housing growth demand in South Dublin County, in line with National and Regional Policy. ([SD-C147-109, Muirenn Duffy](#))

### **Sustainable Movement**

It is recommended that the Plan prioritise active travel modes with specific reference to the restoration of the Silver Bridge to become a pedestrian/cycle link, extension of Liffey Cycle Route/Greenway, Palmerstown and the village of Lucan to provide sustainable mobility connections for cyclists and pedestrians, to assist in easing traffic congestion and reducing



pollution. A further submission raises the issue of a cycle route to the Backweston agricultural labs in conjunction with Kildare County Council. ([SD-C147-44, Rebuild the Silver Bridge](#)) ([SD-C147-129, Ger O'Halloran](#)) ([SD-C147-146, Ken O'Connor](#)) ([SD-C147-145, Joe Gilligan](#)) ([SD-C147-149, Ross Boyd](#)). ([SD-C147-76, National Flight Centre](#))

A further submission highlights the need for improvements to sustainable transport modes within Adamstown including improve bus times, safe cycling infrastructure and signage. It is also highlighted that kissing gates and unfinished sections of the cycle network from Adamstown to Hazelhatch inhibit its full potential. ([SD-C147-35, Dublin Cycling Campaign](#))

A submission suggests maximising the strategic nature of Adamstown by supporting significant infrastructural investment in the rail network which will deliver a sustainable county where compact growth marries integrated land use and efficient transport systems. ([SD-C147-166, Castlethorn](#))

Concerns are raised regarding potential traffic congestion, safety and quality of life within Palmerston Village due to a lack of roads infrastructure and the impact of Bus Connects proposals and associated road layouts. There are calls that no further residential developments are permitted until an interchange is provided at Lower Kennelsfort Rd/R148 junction. ([SD-C147-40, Alan Creaner](#)) ([SD-C147-124, Annette O Connor](#))

A submission considers that Weston Airport is an integral part of South County Dublin and it should remain as an airport facility into the future. ([SD-C147-76, National Flight Centre](#))

## **Community Services**

A submission proposes that the definition of community services should be broadened and that there should be a commitment that the provision of green space will be a key focus for the Draft Plan. It is further suggested that the southern and eastern parts of Lucan should be looked at for investment in community services. ([SD-C147-213, Shane Moynihan](#))

Submission suggests that Adamstown's geographic context provides for opportunities to optimise the Grand Canal Greenway to contribute towards wider community benefits. ([SD-C147-166, Castlethorn](#))

A further submission requests the inclusion of a Specific Objective in respect of the St. Edmundsbury lands located within the Liffey Corridor to examine and explore the potential for the development of a Liffey Valley Park. ([SD-C147-161, O'Flynn Group](#))

## **Economic Development and Employment**

One submission highlights the importance of Weston Airport, to facilitate the continued use and further development as a national centre for professional aviation training, for aviation-related tourism, and promote economic growth in the form of a recreational and educational facility in the County. ([SD-C147-76, National Flight Centre](#))

A submission has highlighted that Liffey Valley Shopping Centre should retain its 'Major Retail Centre' zoning objective, Level 2 status in the Retail Hierarchy and the 'Core Retail Area' in the new Draft Plan. It further calls for a Specific Local Objective relating to the Core Retail Area to support greater flexibility in retail store types. ([SD-C147-142, BMA PLANNING](#))

The submission considers Adamstown is located in close proximity to employment zoned lands offering opportunities for sustainable development. ([SD-C147-166, Castlethorn](#))

The Failte Ireland submission has expressed that further developments of the public realm, improved wayfinding, signage and Tidy Towns Initiatives should be prioritised in Lucan in order to maximise its tourism potential and build upon significant investment already received from Failte Irelands Destination Towns Funding Programme. ([SD-C147-228, Failte Ireland, Failte Ireland- National Tourism Development Authority](#))

## **Infrastructure and Utilities**

A submission suggests that utilities infrastructure as constructed in Adamstown has been designed to support the future development of the southern portion of Adamstown SDZ. ([SD-C147-166, Castlethorn](#))

## **Natural Heritage and Biodiversity**

Submissions highlight the importance of restoration of the Silver Bridge, across the River Liffey, and to work collaboratively with Fingal County Council to restore this link in order to provide a unique amenity facility for the area and to create a Liffey Valley National Park. ([SD-C147-149, Ross Boyd](#))

The rich natural and built heritage in Palmerstown and Lucan was highlighted as an area which should be promoted and improved to attract visitors while a call for the Grand Canal and its Greenway to be protected and developed as an important ecological corridor was also put forward. ([SD-C147-202, Cllr Alan Hayes](#))

The National Flight Centre advocates that Weston is retained as a rural space to protect and preserve natural heritage and biodiversity, ensuring the purity of Liffey waters, avoid urban sprawl and retain the green buffer on the county border. ([SD-C147-76, National Flight Centre](#))

The need for the Draft Plan to promote the protection of the Grand Canal as an ecological corridor was also highlighted. ([SD-C147-213, Shane Moynihan](#)) ([SD-C147-166, Castlethorn](#))

Another submission seeks access to forest lands at Clonard and Clonbrone lands, Eskill Hill, Lucan from the east, west or north. ([SD-C147-132, Eamon Brennan](#))

## Chief Executive's Opinion

The Chief Executive notes concerns raised in relation the impact of large residential developments within Palmerstown Village in terms of building heights, dominance, design quality and the loss of the unique character of the village. As part of the review process of the plan it is intended to prepare a Building Height and Density Guide which will have regard to the 'Sustainable Urban Housing design Standards for New Apartments Guidelines for Planning Authorities' (2018) and the 4 SPPR's contained within the 'Urban Development and Building Heights Guidelines for Planning Authorities' (2018) in order to inform policy provision within the plan and guide future development.

The Chief Executive acknowledges the submissions received regarding restoration of the Silver Bridge across the Liffey. It should be noted that the Silver Bridge is in the control and ownership of Fingal County Council. A feasibility Study has been carried out by Fingal regarding the restoration of the bridge but currently ownership on either side of the bridge is private and this presents challenges to delivering a feasible connection to the north side of the Liffey.

In regard to the designation of Palmerstown Village as an Architectural Conservation Area it should be noted that an independent appraisal was previously carried out by the Dublin Civic Trust which recommended that Palmerstown Village did not warrant formal designation as an ACA and that the Mill Complex should be provided with protection due to it being the only historical industrial area within South Dublin County.

The submission relating to Adamstown being a model example in placemaking is noted.

The Draft Plan will review and amend if necessary, the existing policies in relation to the preservation and enhancement of the historical character and the visual setting of the County's built heritage.

In relation to Climate Action and Energy, the compact growth approach within the Lucan/Palmerstown/Adamstown neighbourhood area to achieving appropriate densities is supported and encouraged, delivering efficient public transport and increased energy efficiency to contribute towards the County's transition to a low carbon, climate resilient and environmentally sustainable economy.

The review of the development plan will seek to build on the policies and objectives contained in the current 2016-2022 Development Plan. Full regard will be had to the National and Regional Planning Policy Context and the designated growth areas identified within those plans will inform the Core Strategy.

The Council recognises the importance of compact growth (NSO 1 of the National Plan) as a central theme for development at National and Regional planning level, noting the long-term benefits of this pattern of growth out-weigh the short-term development of greenfield

sites which require new infrastructure whether it is transport, utilities or social infrastructure.

The Metropolitan Area Strategic Plan includes an integrated land-use and transport strategy plan for the Dublin Metropolitan Area with compact growth and development along existing and planned transport infrastructure central to the delivery of this plan.

Making efficient use of available land resources and infrastructure within our urban footprint, integrating land use and transport, forms a key approach to climate change and to the creation of sustainable communities and should be supported in the draft Plan.

Delivering national and regional transport policies are at the core of building sustainable communities, which is supported by fast, efficient, integrated public transport and a road network which has appropriate capacity, is well maintained and capable of supporting significant pedestrian and cycle usage safely.

The potential for sustainable movement along green cycle routes throughout the County such as a Liffey Cycle Route and a Greenway from Dublin city centre to Kildare are noted. The principle of additional provision of cycle routes and greenways within the County is supported and policies in the draft Plan should support their delivery where appropriate. The Council will align with the Dublin Metropolitan Area Cycle Network, the National Planning Framework 'Project 2040', the Transport Strategy for Greater Dublin Area 2016-2035, the National Development Plan 2018-2027 and Smarter Travel-A Sustainable Transport Future 2009-2020 in relation to transport needs in the County.

The Draft Plan will continue to support the development, enhancement and promotion of sustainable mobility policies and objectives. The delivery of Metropolitan Cycle Network and alignment of the transport investment priorities identified in the RSES such as RPO 8.8 which supports delivery of rail projects such as LUAS expansion to Lucan, the assessment of potential LUAS expansion to Hazelhatch, the electrification of existing Kildare line to Hazelhatch and RPO 8.9 which supports the delivery of bus projects such as new interchange and bus hub facilities and Bus Connects.

The Council will continue to incorporate policies and objectives into the Draft plan relating to provision of community infrastructure. To inform this process the Council are currently undertaking a Social Infrastructure Audit of the existing community infrastructure within the County and will determine future requirements based on existing and projected population growth within the County.

A Green Infrastructure Strategy is being prepared as part of the draft Plan and will inform policy on a green network for the County. A review of open space policy is also being undertaken as part of the preparation of the draft Plan which will inform policy provision on the hierarchy and type of open spaces to be provided. The issue of permeability should be addressed in the Draft Plan and reflected in the recommendations to this report.

The issues raised in relation to Economic Development and Employment in the context of Lucan/Palmerstown/Adamstown area are noted. SDCC is committed to building on the

policies and objectives contained in the current Plan in a manner that will strengthen the County's economic competitiveness and attractiveness for investment.

The submission highlighting the importance of Weston Airport as a high-quality specialised piece of physical aviation infrastructure which performs a key economic role within the county is noted. A review of the existing policies and provisions in the current plan, largely relating to the required safety constraints and noise regulations around the aerodromes and airports within the County is underway, the recommendations of which will be used to inform the Draft Plan.

It is acknowledged that the retail sector has an essential role in the economic growth of the County. In particular, the role of Liffey Valley Core Retail Area and other retail centres within the neighbourhood. The Draft Plan will build upon existing policies and explore new policy options to strengthen the County's retail function. Draft Plan policies will be required to align with retail policies contained within the Retail Strategy for the Greater Dublin Area 2008-2016. The Retail Hierarchy within the current County Development Plan is consistent with the provisions of RPO 6.11 and table 6.1. The Draft Plan will incorporate provisions for retailing within the County to facilitate future growth of this sector.

The Council will continue to support and facilitate the development of a sustainable tourism industry and recognise the value of tourism to the economic growth of the County. In this regard, at this neighbourhood level, the Council will be upgrading the entrance and car park to Lucan Demesne and will present preliminary designs in due course for the upgrading of the village green, the riverside weir and for signage linking the two.

Submissions identifying the rich natural heritage of Palmerstown, Lucan and the rural lands surrounding Weston and the importance of the Grand Canal Greenway as an ecological corridor are noted. The Draft Plan will seek to build on existing policies to protect and enhance biodiversity and promote ecological corridors such as greenways to bolster the natural assets within the County. The preparation of a Green Infrastructure Strategy will identify opportunities to develop the green network within the County.

Infrastructure provision within Adamstown SDZ is being delivered in line with the phasing requirements of the SDZ planning scheme and future developments in Adamstown will continue to be required to adhere to these phasing requirements. The potential for that infrastructure to serve further lands outside the SDZ boundary will only arise if lands are identified as being required as part of the evidence-based core strategy for the draft plan.

## **Chief Executive's Recommendation**

Strategic recommendations for this neighbourhood area have been addressed under each key strategic issue in section 4.2 above and Part 3 of this report.

## 4.3.4 Naas Road

### Chief Executives Summary

There were 12 issues raised in relation to the Naas Road Neighbourhood Area. The most pressing issues in this neighbourhood related to the strategic issues of Population Growth and Housing and Economic Development and Employment.

Topic	Issues Raised	% of Total
Climate Action and Energy	2	0.23%
Economic Development and Employment	4	0.45%
Population Growth and Housing	4	0.45%
Sustainable Movement	2	0.23%
Total	12	1.36%

### Climate Action and Energy

The existing role of industry within the Naas Road area in the production of zero emission fuel sources was outlined as was the role Green Infrastructure can play in contributing towards climate action within the future development of this area. ([SD-C147-97, BOC Gases](#))

### Economic Development and Employment

A number of issues raised referred to the presence of existing industry within the Naas Road Area, the need to facilitate the expansion of existing industries and employment types within the area and the constraints facing industry within this Neighbourhood Area with displacement noted as a key concern.

The need for continued engagement with Dublin City Council, the NTA and other key stakeholders was raised in developing an economic and employment strategy for the forthcoming plan which provides an appropriate balance between residential development and the re-intensification of employment lands and mixed uses.

([SD-C147-97, BOC Gases](#)) ([SD-C147-144, Office of the Planning Regulator](#))

### Population Growth and Housing

Submissions acknowledge the potential for the future development of the Naas Road area, highlighting opportunities for intensification of uses that maximise existing infrastructure such as the Luas, while the challenges in regard to providing a mixed use development comprising of higher density residential development require further exploration in regard to viability. One issue highlighted the need for a co-ordinated approach to future development within this area in the form of a Local Area Plan. ([SD-C147-219, Sean O'Donnell Sean Lillis](#)), ([SD-C147-97, Glen Jenkins, BOC Gases](#)), ([SD-C147-198, Carly Bailey](#))

### Sustainable Movement

The need for safe cycle infrastructure to be provided within the area was highlighted. Particular reference was made to the cycle lane on the Naas Road heading from the Red Cow towards the city centre which is segregated for circa 200m and then ends at a left turn slip road at Woodies which is a dangerous point to enter traffic, that the existing segregated cycle/pedestrian bridge from the Ballymount Industrial Estate that crosses the N7 needs serious improvement as markings have faded and there is insufficient signage and that there is a need from cycle lanes within Ballymount Industrial Estate. A requirement for convenient and suitable road access for distribution purposes was identified. Road Maintenance was also raised as an issue within an existing industrial estate. ([SD-C147-35, Muireann O'Dea O'Dea, Dublin Cycling Campaign](#)), ([SD-C147-97, Glen Jenkins, BOC Gases](#)) ([SD-C147-24, Niamh Stephens](#))

## **Chief Executive's Opinion**

The Chief Executive acknowledges the submissions raised with regards to Climate Action and Energy and highlights the adoption of SDCC's Climate Action Plan 2019-2024 and the Climate Action and Low Carbon Development (Amendment) Bill 2020 that requires Ireland to be Carbon Neutral by 2050. The County, including the Naas Road Masterplan study area aspires to become low carbon and to make a tangible effort to increase energy efficiency and to unlock renewable energy potential.

A Green Infrastructure Strategy is being prepared for the County in tandem with the County Development Plan and will be taken into consideration as part of the master planning project, which is currently ongoing for the Naas Road / Ballymount area, to ensure that any future framework plan is consistent with this Strategy.

The Chief Executive acknowledges issues raised in relation to Economic Development and Employment. As the Naas Road area changes and becomes more intensely developed there will be an inevitable shift in land uses with more mixed development taking place over time. The Council fully recognises the important role of existing businesses in the area in offering employment opportunities but also in helping the County to function. The Council will need to prepare a plan that takes account of existing operations, what industry will need to stay and what will be able to move. The potential displacement of existing uses in the area and their relocation elsewhere is a key factor for consideration as part of the ongoing master planning exercise.

The submission from the Office of the Planning Regulator is acknowledged and welcomed by the Chief Executive and as highlighted SDCC will continue to engage with Dublin City Council, the NTA and other key stakeholders in developing an economic and employment strategy for the forthcoming Development Plan which provides an appropriate balance between residential development and the re-intensification of employment lands and mixed uses.

Issues raised regarding sustainable movement, population growth and housing are acknowledged and noted. Issues regarding opportunities for intensification of uses that maximise existing infrastructure and public transport, such as the Luas, the rail line and buses are noted.

The issue of the need for safe cycling infrastructure is noted. The recommendations for policy in the Plan should include this issue. Specific access issues will be dealt with through the development management process. While the submission on road maintenance is noted it is an operational matter and not one for the Development Plan to address.

The suggested need for a co-ordinated approach to future development for the Naas Road in the form of a Local Area Plan is also acknowledged and consideration will need to be given to the most appropriate statutory plan type for the area.

South Dublin County Council and Dublin City Council are undertaking a joint master planning project for the Naas Road, Ballymount, Park West and Cherry Orchard areas. In July of this year and after a formal procurement process, a multi-disciplinary masterplan team was appointed. Stage I of the project is to prepare a baseline study of the area and to gain an understanding of the site, including but not limited to topics such as, land-use and the economy, demographics, movement and mobility, environmental factors, and site constraints. Stage II of the project involves the preparation of a non-statutory Strategic Framework Plan or Masterplan which will be informed by the work and findings that is currently on-going as part of Stage I. The master planning project, which is to be completed in Q4 2021, will seek to ensure a sustainable and co-ordinated approach to the future development of the Naas Road area, including the optimisation of strategically important regeneration land and infrastructure investment in line with national policy.

## **Chief Executive's Recommendation**

The recommendations for this neighbourhood area have been addressed under the relevant key strategic issue in section 4.2 above and as Part 3 of this report.



## 4.3.5 Rural Uplands

### Summary of Issues Raised

There were 7 issues raised in relation to Rural Uplands. A breakdown of strategic issues in this neighbourhood can be seen under the table below.

TOPIC	Issues Raised	% of Total
Built Environment and Placemaking	2	28.5
Community Services	1	14.3
Economic Development and Employment	1	14.3
Natural Heritage and Biodiversity	2	28.5
Sustainable Movement	1	14.3
Total	7	100%

### Built Environment and Placemaking

Submissions suggest that both physical and community infrastructural supports are needed in this neighbourhood area to support community development, enhance the sense of place and the unique landscape of the area. ([SD-C147-89, Glenasmole Concerned Residents & Farmers](#)) ([SD-C147-226, Brock McClure](#))

### Community Services

A submission expresses the need for increased Community facilities within the area with particular reference to the provision of a nursing home facility at Orlagh House. ([SD-C147-226, Brock McClure](#))

### Economic Development and Employment

A submission has suggested that the provision of a nursing home at Orlagh House with complementary health and related uses developed in tandem with tourism uses would have the potential to generate significant levels of employment opportunities in the local rural economy for people employed in the professional / caring and tourism industries. ([SD-C147-226, Brock McClure](#))

### Natural Heritage and Biodiversity

A submission suggests that the development of Orlagh House demesne will facilitate and provide for the estate management of trees, woodlands and watercourses within the demesne to ensure they are preserved and enhanced in a manner which will result in increases in natural biodiversity, green linkages and the ecological value of the area. ([SD-C147-226, Brock McClure](#))

A further submission contends that there should be no further rezoning of land for housing or other development above the current limit of 120m in height. This is in the interest of climate change mitigation, biodiversity, and amenity value/protecting views. Such lands should be prioritised for re-wilding and planting woodlands (grants are available for native

deciduous trees). ([SD-C147-169, South Dublin Conservation Society, South Dublin Conservation Society](#))

### **Sustainable Movement**

A submission has suggested that if any development for hotel, leisure, recreation and tourism elements on Woodtown Manor House and lands should include a provision for the adequate upgrading of Stocking Lane to meet the requirements of the extra traffic generated by such development and notes that there is an existing road improvement objective in the current plan for the R115 Stocking Lane, to provide safer access to the Dublin Mountains. ([SD-C147-126, Simon Clear & Associates](#))

## **Chief Executive's Opinion**

The Chief Executive acknowledges issues raised regarding maintaining the unique character and sense of place and community facilities within the Rural Uplands. The Draft Plan will include a Landscape Character Assessment and policies in the Plan will reflect the unique landscape character and sense of place of the rural uplands. A Green Infrastructure Strategy is also being prepared as part of the draft Plan and will inform the green network for the County and its role in placemaking.

A social infrastructure audit is being carried out as part of the Plan preparation to assess existing community services and future needs within the county. The outcome of this audit will inform policy and objectives for community infrastructure including health care provision.

Regarding the specific issue of nursing home developments within the rural uplands as a potential employment generator the policy provisions set out in the current Plan (2016 – 2022) should be noted, where the provision of such facilities is supported in residential and mixed use areas and at locations that are proximate to existing services and amenities including pedestrian paths, local shops, parks and public transport. The council will continue to support the Health Service Executive and other statutory and voluntary agencies in the provision of appropriate healthcare facilities in the right locations.

The large rural area in the south of the county with its unique culture and identity, its ample natural resources, biodiversity, heritage, environmental qualities and its landscape character are fully recognised. Policy measures to support the local economy will be considered as part of the review of the current Plan.

The issues raised in relation to natural heritage and biodiversity which highlight that no further re-zoning of lands above 120m height limit should occur in order to protect and preserve natural heritage, amenity values/views, to promote biodiversity and associated green infrastructure is noted. The current plan provides that development above the 350 metre contour in the Dublin Mountains will seek to protect the open natural character of mountain heath, gorse lands and mountain bogs. Existing policies and objectives within the current plan will be reviewed and strengthened where appropriate.

Existing road improvement objectives in the development plan will be reviewed and retained where appropriate. The delivery of such road improvements will be informed by the capital programme and roads programme.

### **Chief Executive's Recommendation**

Strategic recommendations for the neighbourhood areas are included in the relevant strategic issue in section 4.2 and Part 3 of this report

### 4.3.6 Tallaght

The issues of most concern in the Tallaght neighbourhood area were those around the built environment and placemaking and population growth and housing. Economic development also featured strongly.

Topic	Issues Raised	% of Total
Built Environment & Placemaking	11	22.9%
Community Services	4	8.3%
Economic Development & Employment	8	16.6%
Infrastructure & Utilities	3	6.25%
Natural Heritage & Biodiversity	6	12.5%
Population Growth & Housing	12	25%
Sustainable Movement	4	8.3%
Total	48	100%

#### Built Environment & Placemaking

A submission stated that placemaking is not just about construction of new areas but also about the creation of a larger unbroken, walkable environment. The submission goes on to state that for Tallaght to grow development must focus on the construction of high-density mixed-use developments to foster a diverse local economy, built on commerce and nightlife to allow Tallaght to flourish as a destination. ([SD-C147-18, Jos fullam](#))

Another submission calls for more high density housing on REGEN zoned land to be of high quality and an attractive place to live. ([SD-C147-203, Betsy Omidvaran](#)).

A number of submissions acknowledge restoration work being carried out on buildings in the County such as Ballymount Gate. There is also a request for the restoration of Tynan Hall. ([SD-C147-100, Olive O'Malley](#), [SD-C147-220, Martin Purcell](#)).

The development of a Museum or Heritage Centre within Tallaght is requested. ([SD-C147-178, Albert Perris](#), [SD-C147-175, John Lahart](#))

The installation of brown heritage signs and black village signs in Tallaght Village is requested ([SD-C147-208, Tallaght Community Council](#)).

A number of submissions request the proactive support and protection of the Tallaght Village Architectural Conservation Area. Tallaght Community Council also requests that traditional village centres be kept as vibrant and sustainable centres which follow a consistent design statement. The submission goes on to state there should be an SLO put in place regarding building height in Tallaght village. ([SD-C147-110, Teresa Costello](#), [SD-C147-211, Tallaght Community Council](#), [SD-C147-208, Tallaght Community Council](#) ).

One submission notes that the Old Bawn Waterfall is incorrectly referred to as the 'City Weir' in the existing CDP and the list of protected structures and should be corrected. ([SD-C147-194, Gerard Stockil, Tallaght Community Council](#))

### **Climate Action and Energy**

A submission has called for South Dublin County Council to make public information on the energy potential of the Balrothery Weir and the Dodder in general, with a view to a Community Energy Scheme and that the Council support any local bid for a RESS Scheme. ([SD-C147-73, Eugene Barrett, Knocklyon Network](#))'

### **Community Services**

A number of submissions request the need for appropriate and proper community facilities to be provided throughout Tallaght due to population growth in the area. A submission requested a second Garda station for Tallaght due to growth in population. ([SD-C147-220, Martin Purcell, SD-C147-200, Gerard Stockil, Tallaght Community Council](#))

Another submission highlights the need for toilets and changing rooms to be placed at Aylesbury Park for soccer and Gaelic teams. ([SD-C147-188, Teresa Costello](#))

### **Economic Development and Employment**

A number of submissions raise concerns about the retention of jobs in Tallaght. Areas highlighted for continued growth of jobs include, Cheeverstown, Fortunestown, Cookstown and Tallaght LAP area. In addition, a number of submissions note that the areas of Jobstown and Killinarden have been highlighted as areas which require jobs growth for younger disadvantaged people. The need to retain existing businesses along with new in Cookstown is highlighted. ([SD-C147-167, Ed Barrett, Gravis Planning, SD-C147-98, Kar Kin Lim, SD-C147-201, Tallaght Community Council, SD-C147-138, Rohan Holdings Ltd.](#)) .

One submission relates to data centres replacing traditional employment facilities within Tallaght. It is requested that the number of these developments are limited throughout the LAP area. ([SD-C147-220, Martin Purcell](#))

One submission requests the council explain how the Tallaght Local Area Plan states that both employment and population will increase, however the Issues paper on Tallaght states that 'regeneration may cause displacement of some business', which seems to suggest that jobs in the area may be reduced. It ask for a detailed plan which highlights how the population and job figures in the LAP are accommodated without displacing jobs. ([SD-C147-201, Tallaght Community Council](#))

It is requested that LAPs are given heightened roles which will have a positive effect on South Dublin's future workforce and economic development. ([SD-C147-138, Rohan Holdings Ltd. Rohan Holdings Ltd., Rohan Holdings Ltd.](#))

The South Dublin Chamber refers to the importance of Tallaght as being a strong centre, with increased employment opportunities and public facilities. ([SD-C147-61, Peter Byrne, South Dublin Chamber](#)).

## **Infrastructure and Utilities**

SDCC is commended in the progress it has made in connecting the Peamount and Saggart water reservoirs and the N81 Hollywood Cross to Tallaght Road Improvement scheme. It is requested that schemes such as these should be supported in the Draft Plan, this in turn will support the expansion of commercial and residential developments which are required by residents. ([SD-C147-74, Hugh Durkin](#))

It was highlighted that utility boxes should be placed along boundary walls in order to not block sight lines. ([SD-C147-208, Tallaght Community Council](#))

There was a request for the retention of the Old Bridge Way in Sean Walsh Park. ([SD-C147-208, Tallaght Community Council](#)).

There is a request that SDCC should make public their information on the energy potential of the Balrothery Weir and the Dodder in general, with a view to a Community Energy Scheme ([SD-C147-73, Knocklyon Network](#))

## **Natural Heritage and Biodiversity**

It is stated that the area surrounding M50/N7/Belgard road should be maintained as a green belt for the Tallaght/Clondalkin area. If removed it will lead to more densification of the area, which is highlighted in another submission, looking for a buffer zone between Tallaght, Clondalkin and the Naas Road. ([SD-C147-100, Olive O'Malley, SD-C147-220, Martin Purcell](#)).

The facilities at Ballymount Park are commended, requesting them to be retained and extended ([SD-C147-220, Martin Purcell](#)).

A submission asks that the new Plan support the completion of the pathway in Aylesbury Park in Tallaght to full circuit pathway within the boundaries of the park, providing a safe looped walkway that can be enjoyed by all people, young, old and those with reduced mobility and providing a vital facility in an expanding community and that markers be located along the walkway beside parch marks found at Old Bawn House. ([SD-C147-191, Denise Delappe](#)).

Improvements along the Dodder Valley Park are requested and it is also recommended that the River Poddle be brought into use, creating a visual asset for the County. The same submission asks for improvements to Sean Walsh Park including the provision of tea rooms and a farmers market.

Other improvements throughout the County include addressing problems of scrambler bikes, addressing access to Tymon Park, as well as introductions of SLO's to protect the natural heritage of the County.

The provision of Tree Preservation orders is sought throughout Tallaght in areas such as, Kiltalawn House, TUD Tallaght, the hedgerow on the N81 through Jobstown, the hedgerows on the Kiltipper Road, Bohernabreena Road and Ballymanna Lanes and The Priory woodlands and heronry. ([SD-C147-194, Tallaght Community Council](#))

A submission requests a local heritage and Tallaght heritage centre be provided within the Draft Plan, in line with what is stated within the Tallaght LAP. ([SD-C147-208, Tallaght Community Council](#)).

### **Population Growth and Housing**

It is suggested that Tallaght should be made a city, separate to Dublin City. ([SD-C147-14, Joe Cully](#))

A focus on the provision of high-quality walkable and dense mixed-use developments on brownfield sites is requested. ([SD-C147-18, Jos Fullam](#)).

Tallaght Community Council has raised several issues relating to population growth and housing. Concerns are expressed that too many SHD applications are being granted in Tallaght, not allowing for proper placemaking. That there is a need to harmonise the Tallaght LAP and the new CDP, due to differences between the Issues Paper and the Tallaght LAP figures. It is stated that the SDCC Part 8 at Belgard Square contradicts the Tallaght LAP policy for a minimum of 30% requirement for 3-bed units. It is also queried why the growth of Tallaght under the LAP is unsustainably large compared to National/Regional figures.

The Community Council requested that the council lobby the Government to increase the minimum floor spaces in all apartments to allow for work from home facilities. They indicate that there is a massive overhang of empty apartments and a change in housing type is needed to ensure sustainable development and a reduction in vacancy. This to be addressed by way of a specific local objective (SLO). The construction of other housing types is proposed to widen housing stock and appeal to families, in order to widen social demographics. An SLO to create a demographic mix who make Tallaght their long-term home by ensuring there is a robust. A mix of housing types in the County Town is also requested. An SLO is proposed to make Tallaght more sustainable and less cluttered ([SD-C147-200, Tallaght Community Council, SD-C147-208, Tallaght Community Council](#)) [SD-C147-201, Gerard Stockil, Tallaght Community Council](#)

### **Sustainable Movement**

A number of submissions deal with the need for safe cycling infrastructure within Tallaght. It is also highlighted that there are difficulties in combining pedestrian and bicycles on the same path without separation. ([SD-C147-220, Martin Purcell, SD-C147-73, Knocklyon Network](#))

The lack of Luas red line services during peak times is highlighted, also asking for high capacity public transport, as well as revisiting the Metro Extension. ([SD-C147-220, Martin Purcell](#))

It is requested that the pathway in Aylesbury Park be completed, providing a safe looped walkway. ([SD-C147-191, Denise Delappe](#))

### **Chief Executive's Opinion**

The submissions raised with regards to Built Environment and Placemaking are acknowledged. Consultants have been engaged as part of the preparation of the draft development plan to review height and density policy across the County. Policy within the draft Plan will have to have regard to national planning guidelines including the Urban Development and Building Heights Guidelines which were issued by the Department of Housing, Planning and Local Government in December 2018. These guidelines included specific planning policy requirements (SPPRs) which must be complied with by local authorities in carrying out their functions.

The issue raised with regards to Climate Action and Energy is noted. SDCC's Climate Action Plan 2019-2024 and the Climate Action and Low Carbon Development (Amendment) Bill 2020 require Ireland to be Carbon Neutral by 2050. Policies which will contribute to the low carbon economy, increase energy efficiency and promote renewable energy will form a key aspect of the Draft Plan.

The issues of placemaking and urban design were addressed in detail in the preparation of the 2020 adopted Local Area Plan. A detailed urban design assessment around the core concepts of centrality, connectivity, permeability and distance from public transport was carried out. The Plan approach is characterised by cascading heights and density outwards from the core of the Town Centre and public transport nodes and using the existing hierarchy of streets.

The overall strategy is formulated using best practice urban design principles; urban function, movement and public transport, land use, building height and density.

With regard to ACA's the Chief Executive acknowledges the importance of the built heritage of the villages within the County including Tallaght. The existing designated Architectural Conservation Area (ACA) in the village aims to protect historic and cultural buildings. The Draft Plan will review policy in relation to the preservation and enhancement of the historical character and the visual setting of Architectural Conservation Areas, it will also consider any proposals requesting changes to the ACA's. The implementation of these policies will add value to these assets and the villages in which they are designated creating more attractive places in which people can live and work.

The issue raised on the Old Bawn Waterfall is noted and will be reviewed as part of the preparation of the Draft Plan.

The Chief Executive notes that the Tallaght Local Area Plan adopted in 2020 includes a social infrastructure audit and a detailed phasing programme which provided for the delivery of community infrastructure in tandem with development.

It is also noted that the 'Local Economic and Community Plan' (LECP), includes measures to promote and support community and economic development in the County, with one of its key goals being 'Delivery of Community Facilities'. The Draft Plan will include policy and objectives which will support LECP and LAP community infrastructure projects.



The submissions on Economic Development and Employment are acknowledged. A review of economic development trends and needs in the County is ongoing in preparation for the draft development plan. This will include a review of policy and objectives for inclusion in the Draft Plan, and the outcome of this review will seek to strengthen the County's economic competitiveness and attractiveness through appropriate policy measures. The consolidation and sustainability of existing centres will be a factor to the long-term success of the County.

The comments raised regarding the contents of the Tallaght Local Area Plan which provides for increased population and employment and the content of the issues papers is noted. For clarification, the Tallaght Local Area Plan acknowledges the risk of displacement of existing businesses within the LAP area especially in Cookstown and the Town Centre as the regeneration zoning will provide for more residential and intensive office based commercial development. However, the plan also contains strong policies which support the integration of existing businesses into any new development within these regeneration areas. It also supports the accommodation of existing enterprises and businesses within the existing industrial zoned lands within the LAP.

It is confirmed that the County Retail hierarchy will be reviewed as part of the preparation of the Draft Plan.

The Chief Executive acknowledges the submissions relating to Infrastructure and Utilities. The Draft Plan will contain objectives and policies to ensure the delivery of all necessary infrastructure and utilities to support future development in the County. The Draft plan will include policies to support the 'National Planning Framework 'Project 2040', Transport Strategy for Greater Dublin Area 2014-2035, National Development Plan 2018-2027 and Smarter Travel-A Sustainable Transport Future 2009-2020.

The Chief Executive acknowledges the submissions relating to Natural Heritage and Biodiversity. Issues regarding tree planting will be considered as part of the County's Green Infrastructure and Open Space and Strategy, which is being prepared in tandem with the County Development Plan. This document will support the preparation of policies and objectives to help protect and extend the green network throughout the County. It will also address the treatment of lands lying between towns, villages and built up areas within the County. The County's Tree Policy already contains policy relating to tree planting and this will be considered in the formulation of any policy on trees in the draft development plan.

The Chief Executive acknowledges issues raised regarding population growth and housing. Many of these issues will be addressed through the Core Strategy of the Draft Plan. However, the Chief Executive wishes to clarify that the Tallaght Local Area Plan is a statutory six year plan. Given the nature of the plan and the need to ensure consistency going forward in addition to population projections for the six year timeframe of the plan it also contained some detail on the long term potential for housing and population were the entire LAP lands to be built out in the long term. This process accounts for apparent inconsistencies in the population/housing figures. Figures from the LAP will be used to inform the draft core strategy.

The Chief Executive acknowledges issues raised in relation to Sustainable Movement in the context of Tallaght and highlights that the Council aims to develop and enhance cycling infrastructure throughout the County. The delivery of the Metropolitan Cycle Network set out in the Greater Dublin Area Cycle Network Plan, which will be implemented in part through the Cycle South Dublin proposed network aims to improve cycling in the County, throughout the lifetime of the Plan and beyond. The Draft plan will include policies to support the 'National Planning Framework 'Project 2040', Transport Strategy for Greater Dublin Area 2014-2035, National Development Plan 2018-2027 and Smarter Travel-A Sustainable Transport Future 2009-2020. It is confirmed that all relevant documents were taken into consideration and relevant policies and objectives included as part of the preparation of the Tallaght Local Area Plan 2019 and will also inform policy in the draft development plan.

In respect of the provision of three bed apartments the Chief Executive notes the following.

The requirements 'Sustainable Urban Housing: Design Standards for New Apartments: Guidelines for Planning Authorities' preclude statutory development plans from implementing a minimum requirement for three or more-bedroom apartments in the absence of a Housing Need and Demand Assessment (HNDA). As part of the preparation of the Housing Strategy for the draft development plan it is intended to include an interim HNDA until such time as the government publishes guidelines and the proposed national toolkit for HNDA.

In relation to the provision of a museum the adopted Tallaght Local Area Plan 2020 includes Objective ED 9 (chapter 4 Tourism) which supports the progression of a feasibility study to progress the design and funding of a museum for Tallaght. This project to be progressed through the Economic Development, Enterprise and Tourism Development Department of SDCC. Signage issues are a matter for the Economic, Enterprise and Tourism Development Department of SDCC under their Tourism Strategy remit. The same applies to the development of a Heritage Centre in Tallaght. The Draft Plan will contain policies and objectives to support the provisions of the County Tourism Strategy and appropriate signage policy where appropriate.

## **Chief Executive's Recommendation**

Strategic recommendations for this neighbourhood area have been addressed under each key strategic issue in section 4.2 above and Part 3 of this report.

### 4.3.7 Templeogue/Walkinstown/Rathfarnham/Firhouse

#### Summary of Issues Raised

There were 35 issues raised in relation to Templeogue/ Rathfarnham / Walkinstown / Firhouse Neighbourhood Area the greatest number of which relate to sustainable movement.

Templeogue/Walkinstown/Rathfarnham/Firhouse	No.	% of Total
Built Environment and Placemaking	7	20%
Climate Action and Energy	2	6%
Community Services	2	6%
Natural Heritage and Biodiversity	5	14%
Population Growth and Housing	3	8%
Sustainable Movement	16	46%
Total	35	100%

#### Built Environment and Placemaking

The submissions request a number of improvements and enhancements to this neighbourhood area, including: safety improvements, maintenance and enhancement works for the Austin Clarke Bridge, develop a 'mini park' within the Corrybeg Way development in order to prevent the decline of this space into wasteland. It was suggested that a 'marker' should be erected to the poet in the Park and support given to a street artist to compose a gallery underneath the Bridge. ([SD-C147-204, John Duffin](#)),

The submission highlights the need for more green open space as new residential estates have reduced green space compared to older estates. As gardens are reduced in size, the greenery is diminishing as a percentage of the land. ([SD-C147-73, Knocklyon Network](#))

The submission requests the Draft Plan includes Edmondstown in the Templeogue/ Rathfarnham/ Walkinstown/ Firhouse Neighbourhood. ([SD-C147-224, Cunnane Stratton Reynolds](#))

The submission requests local improvement works to Perrystown Village to enhance the public realm and built environment with a wide range of furniture, community facilities, events space and infrastructure to cater for the people in the area which are suitable to all ages. ([SD-C147-141, Ross O'Mullane](#))

#### Climate Action and Energy

The submission requests the Draft Plan to support Community Energy Schemes in any local bids under RESS Schemes and request the Local Authority publish information it has on energy potential for Balrothery Weir and the Dodder in general. ([SD-C147-73, Knocklyon Network](#))

#### Community Services

Submission requests the Draft Plan acknowledges and addresses the lack of community facilities in the neighbourhood and following the survey of community facilities under the

current Development Plan, include a strategy to provide community facilities for Knocklyon ([SD-C147-73, Knocklyon Network](#))

## **Natural Heritage and Biodiversity**

The submissions request improvement to local recreational facilities, to make local parks more inclusive to all and protect biodiversity. ([SD-C147-204, John Duffin](#)), ([SD-C147-181, Pamela Kearns](#))

The submissions request the Local Authority to investigate the potential of the Dodder Valley Parklands for natural SUDs, recreational and wildlife water areas and a linear park south of the Dodder from Ely Arch to the Bohernabreena Reservoir in conjunction with the Dodder Greenway. ([SD-C147-73, Knocklyon Network](#))

## **Population Growth and Housing**

The submission, supported by civil and transportation data outlines the current baseline provision for the strategic development site at Edmondstown, Whitechurch and requests the Draft Plan recognises the potential of the lands to provide a high-quality integrated neighbourhood, remove the current H3 SLO 1 and include a new road objective. ([SD-C147-45, Simon Clear & Associates](#))

The submission requests the Draft Plan retains part of the text under H3 SLO 1 relating to the Edmondstown golf course and requests a 30-metre wide buffer along the boundary of the course be reserved for communal open space purposes. ([SD-C147-217, Edmonstown Golf Club](#))

## **Sustainable Movement**

A submission highlights that there are deficiencies in the existing cycle infrastructure network and requests the Draft Plan to facilitate necessary investment in a network of segregated cycle routes connecting with the Dublin Area and for more localised trips. Submission also requests the Draft Plan to investigate the possibility of a county wide bike sharing scheme and provide adequate bicycling parking.

It is also requested that the Draft Plan prioritise sustainable movement by increasing permeability, increase connections across the M50 and provide orbital public transport routes. The submission also requests that road extensions and realignments should incorporate greenways.

It is further requested that the Draft Plan engages with children and young adults alongside key stakeholders into developing transport infrastructure. ([SD-C147-92, John Shanahan](#))

A submission requests a new car park be provided at the junction of Limekiln Road and Limekiln Avenue to serve Tymon Park which is lacking car parking spaces resulting in overspill of cars into adjacent residential areas. ([SD-C147-34, WORK Residents Association](#))

Submissions highlight the need for public transport provision to serve existing and future development in the Knocklyon, Firhouse- Bohernabreena LEA, Ballycullen area. A number of submissions indicate that a Metro is needed to serve this area, linking up with Metro South and Tallaght. One submission supports the need for a Metro with supporting documentation

and requests that the Draft Plan includes the outcomes of an existing feasibility study for continuing MetroLink to South West Dublin.

The submissions note current bus provision is inadequate but that Bus Connects initiative is welcomed and should connect to high employment centres but is not the sole solution for transport in the area. ([SD-C147-148, Brendan Heneghan](#)), ([SD-C147-198, Carly Bailey](#)), ([SD-C147-56, Paul Murphy](#)), ([SD-C147-73, Knocklyon Network](#)), ([SD-C147-73, Eugene Barrett, Knocklyon Network](#)), ([SD-C147-94, Elizabeth Hickey](#))

A submission highlights the need to improve pedestrian mobility along the stretch of Templeogue Road from Spawell roundabout to the village and provide a ramped access to the underpass and wheelchair accessible fishing platform. ([SD-C147-204, John Duffin](#))

The submission requests the Draft Plan to support existing and emerging Sustainable Energy Community's, with particular reference to a Sustainable Transport Plan for Knocklyon. ([SD-C147-73, Knocklyon Network](#))

The submission requests the Draft Plan includes the pedestrian and cycle infrastructure for St. Columcilles PS works identified under the '300K Have Your Say' Scheme, during the period of the Plan. ([SD-C147-73, Knocklyon Network](#))

Knocklyon Network highlights that Knocklyon area has the potential to be enhanced through better walkways and green areas but attention is required for street and park furniture and general tree and hedge maintenance.

The submission requests the Draft Plan examine the joining up of cycle infrastructure to provide safe space for children, and also welcomes the Dodder Greenway which could have a major impact both on commuting and leisure cycling.

It is further highlighted that there are issues in relation to the lack of development or foresight in the building or widening of roads which is causing issues. ([SD-C147-73, Knocklyon Network](#))

## **Chief Executive's Opinion**

The submissions raised in Built Environment and Placemaking are acknowledged. The three Key Principles of the RSES relating to Healthy Placemaking (along with Climate Action and Economic Opportunity) aim “to promote people’s quality of life through the creation of healthy and attractive places to live, work, visit, invest and study in”. These principles will form a key cross cutting theme in the preparation of policies and objectives of the Draft Plan. The area of Edmondstown is in this neighbourhood.

The submission raised with regards to Climate Action and Energy is acknowledged. In line with the adoption of SDCC’s Climate Action Plan 2019-2024 and the Climate Action and Low Carbon Development (Amendment) Bill 2020 that requires Ireland to be Carbon Neutral by 2050, the Draft Plan will include and facilitate measures to become low carbon as we transition to the 2050 carbon neutral targets. The Draft Plan should include policy and objective in the area of energy efficiency, renewable energy, a modal shift towards public transport and active travel land. County and neighbourhood level. The compact growth model of development will assist in transitioning to a low carbon economy and society.

The preparation of the Draft Plan will include a social infrastructure audit for each neighbourhood reviewing the existing and future requirements for facilities. The outcomes of the audit will inform policies of the Draft Plan in relation to community services and when adopted, the policies and objectives of the 'Local Economic and Community Plan' (LECP).

The submissions on Natural Heritage and Biodiversity are acknowledged. A Green Infrastructure Strategy is currently being prepared as an integral part of the preparation of the Draft Plan. The Draft Plan should include policy to identify and extend the green infrastructure network where this has been identified through the GI strategy. A review of policy on open space is being undertaken as part of the preparation of the Draft Plan and will inform policy.

The issues raised on Population Growth and Housing are acknowledged. It is recognised that lands at Edmondstown, Whitestown are currently zoned for residential development with a specific local objective. The Draft Plan will incorporate a core strategy including a settlement strategy which will set out an evidence-based rationale for developing each settlement in line with National and Regional Policy context.

The issues raised in relation to Sustainable Movement are acknowledged. The Local Authority will continue to develop and enhance cycling infrastructure as part of the wider network throughout the County to make South Dublin a safer place to cycle. The delivery of a Metropolitan Cycle Network set out in the Greater Dublin Area Cycle Network Plan aims to improve cycling in the County, throughout the lifetime of the plan. The council follows the 'National Planning Framework 'Project 2040', Transport Strategy for Greater Dublin Area 2016-2035, National Development Plan 2018-2027 and Smarter Travel-A Sustainable Transport Future 2009-2020 in relation to transport needs for South Dublin. All road designs must comply with Design Manual for Urban Roads and Streets which has included safety considerations in design. A new and improved network of cycle routes has been proposed as part of Cycle South Dublin.

## **Chief Executive's Recommendation**

Strategic recommendations for the neighbourhood areas are included in the relevant strategic issue in section 4.2 and Part 3 of this report.

## 4.4 Stakeholder Engagement

### List of Meeting Topics

1. Heritage	10 <sup>th</sup> September 2020
2. Community and Placemaking	14 <sup>th</sup> September 2020
3. Climate Action	17 <sup>th</sup> September 2020
4. Population Growth and Housing	18 <sup>th</sup> September 2020
5. Economic Development	22 <sup>nd</sup> September 2020
6. Sustainable Mobility	24 <sup>th</sup> September 2020

### OVERVIEW

Six stakeholder meetings were organised by the Planning Department as part of the pre-draft public consultation on the South Dublin County Development Plan 2022-2028 during the month of September 2020. All meetings took place via Microsoft Teams online due to restrictions on meeting in person that were in place at that time due to the Covid 19 Pandemic. The six meetings covered all of the eight strategic themes contained in the Issues Paper Booklet prepared for the consultation.

Each themed meeting started with a presentation by the Senior Planner on the current stage of consultation and understanding of the Development Plan process and purpose. This was followed by a brief overview of the relevant theme by representatives from internal SDCC departments referring to progress and issues identified for South Dublin. The discussion was then framed by sub-theme under the main heading.

The main issues raised and discussed during each of the meetings have been summarised. The summaries are laid out below under each of the six meeting headings. The bodies/persons that attended each of the meetings are listed before each of the summaries and a list of those that were invited but could not attend are listed after each of the summaries.

The stakeholder consultation will inform the opinions and recommendations of the Chief Executive's Report on the pre-draft South Dublin County Development Plan public consultation.

## Meeting 1: *Heritage*

10<sup>th</sup> September 2020

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### IN ATTENDANCE:

**Internal SDCC:** Hazel Craigie, Senior Planner - Tracy McGibbon, Executive Planner – Ben Duignan, Graduate Planner - Therese Prender, Architects – Orla Scannell, Arts – Rosaleen Dwyer, Heritage – Suzanne Furlong, Public Realm – Laurence Colleran, Public Realm.

**External:** Catherine O'Connor, OPW - Gerry Clabby, OPW, Terry Doherty, OPW – Ruth Minogue, Minogue Associates - Clodagh Duffy, Coillte - Nessa Roche, DoACH - James Chilton, Future Analytics - Heather Dowling Wade, Failte Ireland - Aoibhin Flanagan, Future Analytics - Gretta Hannigan, Fisheries Ireland - Matthew Jebb, OPW – Colm Murray, Heritage Council – Gary Tyrrell, An Taisce - Nicholas de Jong, Future Analytics – Nicola Matthews, DoACH – Terry Doherty, DoCHG – Patrick Leonard, An Taisce – Aoife Doyle, Future Analytics.

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### ISSUES DISCUSSED/RAISED:

#### Cultural Heritage

- Heritage has three facets cultural, built and natural.
- Shared use of public open spaces (heritage and arts initiative).
- Invest in improving access to cultural heritage in South Dublin.
- There is a need to enshrine the national list of heritage assets within the draft plan.
- Energy renovations of heritage buildings – energy efficiency. SDCC advised to seek expert advice and to liaise with other local authorities in advance of preparing an energy upgrading policy.
- A need to engage more people to get involved and take ownership of the County's Heritage - culture night an example.
- Communicating heritage, to encourage more people to engage and take ownership through existing events & programmes, while identifying overlaps in areas such as biodiversity & climate change, events such as Culture Night (Friday Week) or First Fortnight (first two weeks in Jan) as two examples. SDCC gave examples of a number of events that they run.
- Wellbeing is received from the arts.
- Investigate the possibility of an online mapping survey of how people use or see things such as open space, engage with their place and what they value.
- Suggestion of a seed fund objective for the architectural conservation officer to support community-led initiatives which raise awareness of built heritage and assist to change mindsets towards valuing it and what it means to people instead of seeing it as inhibiting development. This could work well with the Heritage Forum but would be specifically on built heritage actions.

#### Landscape Character Assessment

- Use the Landscape Character Assessment as a basis to what should be in place.
- The Landscape Character Assessment is under review and will be modified as part of the County Development process, with an emphasis on views and prospects.



- Recognising and weaving historical features and landscapes into the Development Plan
- Views and Prospects – back to the term ‘setting’ and should be considered side by side
- The concept of ‘urban landscape’ should be incorporated given the changes that are happening and associated pressures.
- NIAH – what are our best assets, make sure they have as much protection through policy objectives as possible.
- Vernacular architecture and setting. Landscape informs the typology
- ‘Best place to locate a development is in the worst part of the site’. Consider existing brown field sites/industrial areas for new housing and turn negatives spaces into positives.

### **Built Heritage and Archaeology**

- The importance of the word ‘setting’. Curtilage is difficult to pin down, could utilise the term ‘setting’ and give it an appropriate understanding
- The experience of setting of Protected Structures in relation to proposed development such as windfarms could be examined.
- Use of design quality indicators should be examined. These would help in defining the quality and characteristics of a particular site and the capacity to accept change.
- A new National Architectural Policy is being drafted

### **Green Infrastructure/Biodiversity/Natural Heritage**

- Opportunities to include biodiversity in public parks etc
- Protect green way corridors as their destruction is a major threat to Biodiversity, some of these corridors along rivers are pNHAs and the protection afforded has not always happened.
- Long term road proposals cutting across green areas in west of the County along Kildare boundary would affect wildlife. Most problematic would be the crossing of the Liffey Valley through the last green area of the county.
- Glenasmole now has a good level of protection
- Pressure is on the foothills with examples of reduction in flora
- Spoil for reclamation takes out scrub and changes the landscape.
- Need to think of biodiversity not only in the protected areas. Look for opportunities, at the least no net loss.
- Recognised that SDCC has good biodiversity policy in current development plan
- Need for policy convergence across the Plan with hope that SEA process can help in aligning policies e.g. greenway
- Like to see a long-term perspective on biodiversity. Climate change is a challenge to biodiversity
- Integrate biodiversity into SDCC buildings and projects e.g. bat boxes, swift nests

- Protecting river corridors is really important. They connect biodiversity, Liffey Valley and SAAO very important
- National Guidance on appropriate assessment is currently being updated (2021) to reflect changes in practices and law. (Article 6.3 and 6.4 of Habitats Directive)
- Need to keep in mind three peregrine falcon nesting sites, and kestrel and ravens nesting in quarries.
- Ecosystem services mapping is a very helpful tool. Some good guides from England on how to integrate biodiversity into the built environment e.g. RIBA
- There are lots of synergies which sometimes occur at particular places. Including ecosystem services is important, including cultural services
- Underpin GI and LCA with other synergies, mountains are important in SDCC and the Region, join the dots. Development Plan a good place to do this and to identify the most valuable areas.

## Geology

- Geological sites in SDCC outlined
- Importance of quarries for peregrine falcons nesting sites. Also used by Kestrels and Ravens.

## ISSUES RAISED AFTER MEETING VIA EMAIL OR TEAMS

- Asked that when considering applications involving Protected Structures that onerous conditions, that may make the developer abandon the project or not carry out the required works or that might prevent the structure becoming more user friendly (all with the result that the premises is lost) are not imposed.

## BODIES INVITED TO THE MEETING BUT COULD NOT ATTEND:

Environmental Protection Agency – Dublin Mountains Partnership – Bats Conservation Ireland – Bird Watch Ireland – Waterways Ireland – Irish Georgian Society – EMRA – Irish Architecture Foundation – Geological Survey of Ireland

## Meeting 2: *Community and Placemaking*

14<sup>th</sup> September 2020

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### IN ATTENDANCE:

**Internal SDCC:** Hazel Craigie, Senior Planner - Tracy McGibbon, Executive Planner – Ben Duignan, Graduate Planner - Therese Pender, Architects – Paul McAlerney, Community – Jonathan Hayden – Paddy DeRoe, Architects – Suzanne Furlong, Public Realm – Laurence Colleran, Public Realm – Irenie McLoughlin, Architectural Conservation.

**External:** Kieran Walsh, PPN – Jack Keyes, Age Friendly Ireland - Deirdre McNicholas, Volunteer South Dublin - Tracy Malcolm, PPN - Ronan Leydon, IT Tallaght - Peter Duff, An Garda Síochána - Bibiana Savin, SAGE Advocacy - Phil Mulvaney, IT Tallaght - Joe Rynn, TUSLA - Alan Hanlon, DoES – Aine Cusack, DoES - Kate Oliver, Department of Justice - Rita Harte, Clondalkin/Lucan Women's Network - Donna Doyle, Jigsaw - Mary Corcoran, LCDRC - Tony Twomey, An Garda Síochána – Sharon Harty – Aine Lynch, Tallaght University Hospital.

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## **ISSUES DISCUSSED/RAISED:**

### **What makes good placemaking?**

- There is a need in open spaces to cater for all generations, universal design and encourage integration.
- Develop and enhance ability to have urban food systems and provide a focal point for the community as well as for food. A good way to integrate new communities. The CDP needs to find ways of reconnecting the community with nature, such as green spaces for cultivation, community gardens. Green spaces with functional use.
- Be aware of the Urban Agriculture Initiative
- These types of projects need to be community led.
- Points of inter-connection between nature and the built environment and aesthetics are very important. Smaller green spaces have great potential to get the community involved, particularly in more socially deprived areas.
- Placemaking and public spaces important for health and wellbeing.
- The aesthetic of areas is important.
- Marginalised communities require the maximization of space to reach their full potential – work required to enhance the look of Jobstown and Neilstown.
- Investigate polycentric development where a person can work and reside – to encourage employment and investment. Cultural capitalism. With more homeworking, need for cafes and similar
- Develop retail, cultural etc. before the housing. Need to frontload facilities in communities, children and young person services. There is a lack of integration between housing and central local areas. SDZs solve this issue.
- Facilities required for growing areas of population and large housing estates. Existing facilities to grow alongside growing housing developments.

### **Key Infrastructure**

- Schools, their positioning in terms of the community, need to be in the centre. Important use for the community but patrons have a say in this.
- Seating is important especially along walking routes where ideally, they would be every 200-300 metres. Important to consider this as part of new developments.
- Need charge points for electric bicycles.
- Car parking for primary school drop-off.
- Schools should not be set up before the building – should not be sharing schools.
- Youth centres as key infrastructure.
- Need to plan for greater access to health services. Health services gap in services.
- Tallaght Hospital – student accommodation and accommodation for nursing – remains unsolved.

- Digital hubs, coffee shops, sports clubs, cultural centres, retail, café/pubs all part of key infrastructure. In all neighbourhoods access to Parks. In some cases, these pieces of key infrastructure can all be together.
- Providing healthy spaces through public realm, teenage spaces.

### **How to Ensure Key Community Infrastructure**

- Larger community centres are better from experience. A discussion on the model of management with an explanation that approach by SDCC is to set up a local company managed by the community for the community with SDCC representatives on the board.
- The spec of a new facility is important.
- Elderly should be able to live in a community setting
- Identify areas prone to anti-social behaviour. General discussion regarding design and policing. An Garda Siochana would like to see planning applications going through their Crime Prevention Unit. A lot of work being done in Scandinavian countries. CCTV can be an issue – who monitors who.
- IT Tallaght is developing a module on ‘active citizenship’.

### **ISSUES RAISED AFTER MEETING VIA EMAIL OR TEAMS**

- Concerned that there may be a push to economise on future capital investments/facilities. It is important not to put in inferior quality infrastructure elements during recessionary times.
- Sheltered seating for older people.
- Western Development Commission to be investigated.
- Encourage tree planting, space for cultivation schemes that are community led.
- Public space to be designed for all age groups, gender, ethnicity, and class groups.
- Support for Tidy Towns and environmental groups.
- Recommendations made in the Healthy County Strategy 2019-2022 from the point of view of planning and the public realm. Points to recommendations 8 and 9 on p. 62 of that document which was attached by email. Suggests it is imperative that in planning for the public realm attention needs to be given to spaces for community access to allotments, community gardens and other innovative food cultivation opportunities, particularly in and around schools, colleges, hospitals and nursing homes. The planning strategy should support communities in initiatives to increase healthy eating and reduce food waste, thereby creating a virtuous cycle. The added value of this approach is that people are given the opportunity to engage more with nature, which is found to have very positive benefits for mental health
- Reference to New Haven Connecticut from experience in 2018. Many neighbourhoods in and around New Haven would have a similar profile to some of the disadvantaged neighbourhoods in Tallaght (West) and also had large immigrant populations. An initiative undertaken by The Urban Resources Initiative (sponsored by Yale University)

[www.uri.yale.edu/programs](http://www.uri.yale.edu/programs) made it possible for people to improve the public realm of the neighbourhoods by being able to access resources from the URI. The Community Greenspace initiative in particular provides material resources and supports to resident-driven greening projects. If SDCC could partner with a horticultural company or an appropriate company with a corporate social responsibility remit, it might be possible to set up (or even pilot) a programme of this nature. Getting community buy-in the enhancement of the neighbourhood is crucial to creating defensible space and militating against anti-social behaviour.

#### **BODIES INVITED TO THE MEETING BUT COULD NOT ATTEND:**

Crosscare Youth Service – Childhood Development Initiative – Foroige – Clondalkin Traveller Development Group – Ronanstown Women’s CDP – SDC Partnership – HSE – Department of Agriculture – Volunteers South Dublin.

### **Meeting 3: *Climate Action***

17<sup>th</sup> September 2020

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#### **IN ATTENDANCE:**

**Internal SDCC:** Hazel Craigie, Senior Planner - Tracy McGibbon, Executive Planner – Ben Duignan, Graduate Planner – Chris Galvin, Environment - Suzanne Furlong, Public Realm – Laurence Collieran, Public Realm – Irenie McLoughlin, Architectural Conservation – Fionnghuala Ryan, Environment Awareness.

**External:** David Dodd, CARO – Colin Kelleher, OPW – Vincent Hussey, OPW — Donna Gartland, Codema – Michael McAree, NTA – Clive Bowers, ESB – Dominic Muldoon, OPW – Zee Gamiet-Parker, OPW – John O’Shea, Codema – Graham Brennan, SEAI - Julie Galbraith, NTA.

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#### **ISSUES DISCUSSED/RAISED:**

##### **Energy and Buildings**

- Role of Codema energy master planning District Heating.
- Decarbonisation zones are an action in the Climate Action Plan but no guidelines are prepared yet. CARO has done a position paper on decarbonization zones. They could include landfill, nature-based solutions, transport, EV element.
- Consideration of a designation of a decarbonisation zone at Local Authority Level (possibly de-carbonising zone for the whole county); designate & implement. The zone should not just be for energy and buildings, but also actions such as transportation and tree planting.
- Ventilation a big part of regulations for new builds to help with climate action. Tree planting in brownfields.

## **Transport**

- 840,000 electric vehicles to meet 2030 targets and 100% electric cars would be needed by 2026. EV A regional strategy for EV charging is being prepared. There is a need to look at building and urban design solutions. Guidelines to be put in the plan on new build and renovation and retrofitting.
- Advised that grants are to be made available for charging points for homes and apartments. 100% ducts on all new builds.
- Compact growth – how to achieve. The Development Plan is a step towards long term climate goals – it has to be done in stages. Not a simple one answer.
- Neighbourhood and settlement areas - work with NTA for a modal share with a bias towards active travel and public transport. Bike lanes required.
- Car sharing/club schemes. Discussion on this, seen as reducing car parking and question as to whether there is innovation in two seat vehicles that can be rented, reduce congestion. NTA indicating that this would need to be piloted and demand management should be the first thing to discourage cars.
- CARO advised that a demand management study is coming to final stages being prepared by Dept of Transport and Systra.
- Engagement with the public on key pinch points. The reaction to Dun Laoghaire Rathdown Covid-19 response seen as good.
- Suggested that local authority could designate land for Park and Ride. NTA indicated that Park and Ride facilities are looked at as a short-term solution and strategic P&R is included in their strategy. It is important not to undermine walking/cycling infrastructure.
- Engage with SMART Dublin.

## **Flood Resilience**

- Flood resilience and heat effect.
- Management of riparian strips along waterways. Maintain streams and water quality.
- Manage rainfall and sustainable drainage.
- Green infrastructure – integrated constructed wetlands. Natural based solutions. Rain gardens, biodiversity. Reduced grass cutting. High pollinator plan and programme. Tree planting on public lands.
- It was advised by CARO that there is a regional green infrastructure working group.
- OPW advised that design standards for surface water systems needs to be reviewed. Indicated that there should be objectives in the Development Plan on the Flood Risk Guidelines and any flood schemes with implementation of flood management plans.
- Design standards for surface water systems, a guidance document is being produced by the Environment Department in SDCC, this will be relevant to water quality and flooding.

## **Nature Based Solutions**

- Need to think about maintenance issues for rivers and streams.

- All Ireland Pollinator Plan approach.
- Department of Agriculture woodland scheme, local authority grants available.
- Multi-use functional open spaces as part of GI Strategy.

### **Resource Management**

- National guidance on new waste plan. Elimination of single use plastic. Halve food waste.
- Circular economy.
- Revisions to Construction and Demolition waste.
- Accommodation of waste within new builds. EU requirements for recycling are increasing. Not enough space on public lands and private landowners reluctant to accommodate bottle banks/recycling banks.

### **ISSUES RAISED AFTER MEETING VIA EMAIL OR TEAMS**

- Improvement to footpaths, safe/separate cycle lanes. Investigate space for e-bikes, electric scooters.
- Retrofitting of local authority social housing for energy efficiency to future proof these dwellings.

### **BODIES INVITED TO THE MEETING BUT COULD NOT ATTEND:**

Department of Action & Environment – Eirgrid

## **Meeting 4: *Population Growth and Housing***

18<sup>th</sup> September 2020

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### **IN ATTENDANCE:**

**Internal SDCC:** Hazel Craigie, Senior Planner - Tracy McGibbon, Executive Planner – Ben Duignan, Graduate Planner - Marguerite Staunton, Housing – Niamh Carton, Housing - Colm Maguire, Planning – Leah Clarke, Planning – Therese Pender, Architects.

**External:** Catherine McGilcuddy, Irish Council for Social Housing - Christophe Teevan, Cairn Homes - James Benson, CIF - Pauline Riordan, EMRA - John Hanlon, Harcourt House - Pat Power, Harcourt House - Grainne Johnston, Housing Agency - John White, Ardstone - John Grace, Cairn Homes.

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### **ISSUES DISCUSSED/RAISED:**

#### **Population and Housing Targets**

- Query on difference between ESRI figures and net migration and CSO figures and whether there will be adjustments to the targets and the degree of flexibility within RSES.

- Noted that the NPF and RSES is based on ESRI figures with an allowance for headroom, NPF roadmap relevant. The Department will be releasing work carried out by ESRI with housing targets relevant to Development Plans.

### **Addressing Housing Need**

- Guidelines relevant to Housing Need Demand Assessment due but will not be available in time for this stage of the Development Plan.
- Affordable Strategy being developed in SDCC. Noted by SDCC Housing Dept that planning applications for one and two bed units is in line with need on the housing list. Always a need for three beds.
- There is a high level of need for 1 and 2 bed units for single people & couples. Increase in need for older households. Need for downsizing. Right Sizing Schemes allows tenants in 3 / 4 beds who want to move.
- Keep older people within their community. There is a demand from marriage breakdown, particularly older men. High rents create need.
- Disability housing in line with Housing Strategy.
- A need for age friendly housing, private as well as social.
- Noted that an Age friendly strategy brought to recent Council Meeting. Use of infill sites for 'right sizing'.
- Demographic factors to be investigated.
- EMRA welcomes an evidence based HNDA but recognizes the difficulties in the absence of guidance. Robust analysis important.

### **Compact Growth - Location**

- Apartments have worked well in Adamstown and, the number of 'new Irish', the number from Dublin and surrounding hinterland noted as helping with apartment success in Adamstown. Apartments deemed not ideal for everyone. The three bed houses in Adamstown have been a huge success.
- Clonburris requires a mixture of house types and tenures. Development on infill and brownfield brings additional challenges. There will be a push towards duplex and apartments but viability not there putting an extra strain on affordability.
- In South Dublin three bed houses have been a big success, a review shows this to be similar to all local authorities. Surprised by mix of tenants. Scheme in Stocking Lane – north, worked well. Also scheme in White Pines with over 100 traditional unit being rented to the market is successful.
- 3-bedroom apartments hard to make viable, better to look to something away from the apt block. Hard to tick all the boxes in building regulations and planning standards e.g. dual aspect.
- Difficult to compare other European countries to us as standards are far higher now than in other countries with Ireland seen as having superior quality. Viability is entwined with this.



- More could be done with amenity, workspace outside apartments, break-out spaces.
- Some developers looking at changing internal design and model concept to adapt to work from home. Also, different options for apartments – 2 beds with smaller area for home office. ‘Pod’ in garden another option where built into the planning application and design.
- The Metropolitan Area Strategic Plan has potential as a forum to co-ordinate transport

### **Compact Growth - Delivery**

- Affordability and supply issues
- Regeneration of the Naas Road. Transportation into older industrial areas.
- Irish Water connections. Network not meeting capacity and developers are not certain of network needs and associated costs until too late in development process. Impacts on affordability as costs are passed on to buyers on behalf of the whole community. Lack of clarity of costs to developers will impact on growth potential.
- There can be an inconsistency in interpretation of Part Vs. Developers noted possible increase from 10% to 20% with concern as seen as impacting on marginally viable projects.
- Developers see the end of SHD process as a threat to delivery
- Covid-19 has slowed development
- Site assembly – development always easier on single owned sites. smaller sites less viable
- Viability for apartments outside Dublin not good.
- vacant site levy seen by CIF as being successful. Planning process can put developers in an unfair position from timing perspective.

## **Meeting 5: *Economic Development***

22<sup>nd</sup> September 2020

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### **IN ATTENDANCE:**

**SDCC Internal:** Hazel Craigie, Senior Planner – Laura Leonard, SEO Development – Ben Duignan, Planning – Suzanne O’Toole, Planning – Leah Clarke, Planning – Mary Maguire, Planning – Stephen Willoughby, Planning.

**External:** Thomas Rooney, LEO – Heather Dowling Wade, Failte Ireland - Pauline Riordan, EMRA – Conor Simpson, IDA – Peter Byrne, South Dublin Chamber – Aidan Sweeney, IBEC - John Daly - Enterprise Ireland.

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### **ISSUES DISCUSSED/RAISED:**

#### **Attracting Investment**

- Priorities for FDI include serviced sites, mix of building solutions. Each investment creates 70+ jobs on average. These investments need different property solutions and different rates of growth. Need to create a pipeline of property solutions. Quality of life and placemaking piece is really important.

- Compact growth. The need for places for people to live to attract inward investment. Quality of life – offering employment and quality of place to live. Build upon the attractiveness of city life. Employment located alongside transport – transport links with public transport working unusual hours to suit all workers. Investigate apartment living to achieve this. 80% of people coming to work in SDCC are from Kildare, Meath and Wicklow. Upgrading commuter rail services.
- A view that as a county we could be a bit less ‘bland’ if we had more trees
- Provide cross radial routes – Tallaght-Lucan-Clondalkin
- Make best use of urban lands for growth, including employment growth. Regeneration of lands. Long term potential of Naas Road, Cookstown etc
- Large scale office development. Target SDCC as a hub and digi-tech centre. Development of innovation quarter. Development of a new state of the art innovation centre by 2023. Hubs and remote working options to be investigated. Two thirds of investment in the county is office based. Investigate the subdivision of large buildings into smaller office spaces.
- A belief that companies are genuine in pursuing renewable energy solutions. Solar seen as the likely direction for South Dublin. Solar parks should be pursued particularly with data centres. The business sustainability programme referenced.
- Appeal of Dublin Mountains. Need to broaden the domestic appeal as there is lots of potential in South Dublin. Need to meet world class best practice.
- Tourism: Expansion of tourism, heritage and retail sectors. Develop greater connectivity to Dublin City. Integration of storytelling. SDCC’s roads challenging to navigate for tourism purposes - the need to create linkages for people on foot, by bike and park and ride to reach tourism areas.
- Investigate the expansion of tourism – develop local heritage trails and promote the mountains. Work with stakeholders such as hotels.
- Look at themes. Clondalkin heritage centre encourages tourism, valuable for employment.
- The Regional Spatial and Economic Strategy (RSES) has an economic strategy. The role of the MASP in placemaking and marketing is highlighted. An implementation group has been established with Local Authorities and different agencies.
- SDCC has good broadband which is a huge advantage

### **Zoning for Employment**

- The nature of work is changing. Queries whether more nuanced zoning may be appropriate, understanding the needs of technology.
- A view that dedicated areas for certain types of activities is good.
- Homeworking options should be considered
- Potential of regeneration lands – what best suits these areas. Capitalising on transport links
- Buildings are designed around processes – high end manufacturing and global services.
- High end office development looking for campus feel. Recreation spaces and food

- Serviced office space providers e.g. Regis
- Companies attracting people with language skills and from outside of Ireland who have experience of living apartment-life. Need to meet employees' infrastructural needs – getting to and from work. Often employees don't want to buy cars and houses.
- Companies have to deal with natural attrition and so need their employees to be able to rent and travel easily
- An evidence-based approach to quantum and location of zoned lands is welcomed. Focus is on compact growth and increasing employment densities within the M50, with large trip generators – office and retail, located close to high quality public transport.
- Suitable employment for socio-demographic needs

### **Challenges to Growth**

- We have to highlight our benefits as a county as we are competing
- Brexit presents huge challenges which will take time to fully understand
- Covid-19 will impact. The take-up for restarts has been lower than expected
- The business sustainability programme set up many years ago has been a big help in communicating the issues to the local authority. Looking at three groups: those that are doing ok; those struggling with some homeworking; and those that will not survive the negative impact of Covid.
- A good level of start-ups in South Dublin
- Allow for the growth and evolution of companies.

### **Sectoral Challenges**

- Retail – challenges with online
- Office space – many people have a preference to work from home with ability to use an office space in the locality
- Working from home accelerated with Covid. Feedback to IDA is that project teamwork struggles a bit from home. Not necessarily getting back to the office but could work from a hub. Some concern at security issues for companies with working from home in terms of wifi, laptops etc. Hub would help with this where space designated to a company. Reduces need to commute and makes more attractive to workers. Companies no longer requiring such significant scale.
- Ireland is sometimes a jumping space with smaller companies not needing large buildings so much.
- A mix of home working and office most likely
- South Dublin has seen growth in food areas - good opportunity to build and create food locations. How do we encourage these new start-ups to locate in town centres and in particular to re-locate from industrial areas where many of them are currently located.
- How to encourage and create hubs e.g. craft and design  
Retail developments need to be close to good transport. Empty retail spaces. How to deal with the challenges of online trading and how to make shopping streets more attractive

- Regional Assembly analysis on potential for co-working spaces. Looking at sectors most suited and policies around that. Indicated that this work would be published shortly. Separate work being undertaken on areas most affected by Covid.
- Build on measures taken during Covid – placemaking, cycling etc.

## ISSUES RAISED AFTER MEETING VIA EMAIL OR TEAMS

- Fáilte Ireland are developing best practice guidelines for Heritage Trail Apps.

## BODIES INVITED TO THE MEETING BUT COULD NOT ATTEND:

The Department of Housing, Local Government and Heritage – Department of Agriculture – Solas – Irish Housing Federation.

## Meeting 6: *Sustainable Mobility*

24<sup>th</sup> September 2020

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### IN ATTENDANCE:

**SDCC Internal:** Hazel Craigie, Senior Planner – Ben Duignan, Graduate Planner – Tracy McGibbon, Exec. Planner - Suzanne O'Toole, Executive Planner – Leah Clarke, Executive Planner – John Joe Hegarty, Roads - Aws Taki, Roads.

**External:** Julie Galbraith, NTA – Damien O'Tuama, An Taisce – Mairead Forsythe, Dublin Cycling Campaign – Aisling Dineen, TII – Barbara Connolly, Cycling Ireland – Deborah Madden, Cycling Ireland – Heida Hopper-Duffy, Irish Rail – Christophe O'Brien, IAA – Paul Johnston, CIE – William Glover, Dublin Bus – Paul Grogan, NTA – Sallie Shipsey, CIE – Colm Mulcahy, CIE – Brian Wylie, Irish Rail – Paul Mullins, IAA – Christophe O'Brien, IAA – Louise Byrne, DAA – Des Cox, Department of Transport – Tomas Campbell, Department of Transport, Tourism and Sport - Caoimhe Donnelly, CIE.

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## ISSUES DISCUSSED/RAISED:

### Aviation

- Military airbase in Casement is not under IAA but with Dept. of Defence
- Dublin Airport obstacle area has extensive reach across south Dublin up to Louth and Kildare
- Weston – straddles two county boundaries and safeguarding is with the local authorities
- Aerodrome operator has responsibility for protection of their own aerodromes. IAA makes observations as part of the planning process and these are usually aligned with the Aerodrome from Safety Oversight Basis
- Dublin Airport Authority – public safety and noise zones. Fingal is now the designated noise authority for Dublin Airport. New noise zones were introduced in January 2020 but do not extend as far as South Dublin.
- Obstacle limitation surface for Dublin Airport extends 15km protecting aircraft in the air - tall buildings, aers, antenna, cranes.
- Solar policy (glint and glare studies required for proposed developments). No solar farm guidance available yet. DAA have a 15km radius for solar developments that they examine and recommend referrals of planning applications.

- Bird hazard – care to be taken – need to consult.

### **Transport - Compact Growth**

- Link strategic developments to public transport, preferably to rail. Maximise the potential for walking and cycling. Employment and residential to be located in close proximity.
- Compact growth will help – shorten journeys – if below 2 km lend themselves to walking, over that there is drop off. 6 – 7k is a comfortable journey for average cyclist over that cycling trips drop off. Employment and schools – journeys kept compact and short lend themselves to active travel. Good public transport routes – higher density supports viability, helps on two counts.
- Important to keep school journeys as short as possible
- Department of Transport are working on a 2040 Plan, getting transport in first is important to influence modal shift. Freiburg as a good example.
- Integration of land with transport. Phasing of development in accordance with provision of sustainable modes of transportation. Bus routes in places before houses are built (challenging to include bus routes after dwellings are constructed)  
Bus connects – NTA working closely with the local authority's wider area, to plan in advance where there will be bus stops. It is important for NTA to know what is happening and the scale of development down
- the line so they can identify gaps and requirements. Bus Connects – four years for the network and up to 2028 for the infrastructure.
- SDCC working closely with NTA to understand the travel patterns – transport modal share.
- NTA will work closely with SDCC on Clonburris and elsewhere on the bus network

### **Active Travel**

- Compact growth is essential. Services and work as close as possible to where people live.
- Improving the infrastructure is key, women and children still not cycling very much. There needs to be a commitment to deliver the projects – Cycle South Dublin will be key.
- Bike facilities including segregated cycle routes. Links from where people live to the cycling infrastructure. Audit of existing cycling network.
- In Dutch model the first 1-2km are considered walkable and further kilometres being cycled. Where car speeds are over 60km there is a requirement for segregated facilities. Bicycle parking – cycle hubs. E-bikes to replace the car.
- Commitment to deliver walking and cycling – links. Links to public transport. Change of attitude – priority at junctions for pedestrians and cyclists. Retrofitting links into older estates.
- Permeability is critical. NTA is working on a tool to measure permeability using the Transport for London methodology. Also, a measure of accessibility to local services
- A lot of good work in response to COVID. Trials with a perspective to adjusting has been shown to work
- The design of cycle infrastructure is not good. How do we consult with the public on the infrastructure design? Conversation outlined that standards are set by NTA and followed by local authorities; standards are evolving.
- Intermodal transport important – to be able to walk/cycle to the public transport.

### **Public Transport**

- NTA projects – BusConnects final revised network routes due out soon. Dart+ project – rail line. Luas is a later stage project, no agreed alignment. Final strategy 2022, new investment framework
- Radial and orbital bus routes. Phases for orbital routes is a question coming from public to SDCC. NTA advised that the order is the ‘H’ spine first, followed by Lucan corridor but this has to be confirmed.
- Inter-modal transport re-emphasised.

### **Heavy and Light Rail**

- Irish Rail advised that Dart+ expanding in the west and south west. 4-tracking to be complete Park West to Heuston. Electrification to Hazelhatch. Upgrading of signals. New electric fleet.
- Significant increases in rail use at Adamstown and Clondalkin.
- Hazelhatch – increases in rail use from 260/day to 1000/day
- Mass transport mode requires compact growth
- We need secure and covered bicycle parking at stations. Capacity to carry bikes onto trains.
- CIE outlined that the carrying of bikes on trains involves significant infrastructure and is complex
- CIE as one of the biggest landholders is developing a transport-oriented development plan, ensuring that the major stations encourage cycling as part of their development. They are working with micro mobility companies to access their lands – including parking.

### **The Role of Roads**

- Aim to move away from single occupancy journeys but there are higher value journeys e.g. HGV
- Need to look at a better mode of travel, serving the trips that are generated by other ways. If residual capacity need arises only then should we be building new roads.
- Sharing of the roads. DMURS. Best practice in Netherlands and in London.
- It is not just about new roads but how existing roads should be used. Interesting changes in the Dutch environment where visible road narrowing changed behaviour. School zones and school streets.
- Roads to move – for who? Should talk about people moving.
- E-bikes need to be encouraged as a replacement for the car. They need specific parking standards.

### **BODIES INVITED TO THE MEETING BUT COULD NOT ATTEND:**

Department of Housing, Planning and Local Government

## **Chief Executive’s Opinion**

The input and engagement from the wide range of stakeholders is welcomed. The wide range of discussion issues which arose will be further considered and will inform the preparation of the draft Plan.

## **Chief Executive's Recommendation**

The draft Plan should incorporate policies and objectives, as appropriate, to address the issues raised in the stakeholder workshops.

The Chief Executive's recommendations in relation to the topics discussed is set out in Part 3 and 4 of this report and are informed by the issues raised and information gathered through the stakeholder workshops.





## **Appendices**

**Appendix A** - Public Notice

**Appendix B** - Statutory Prescribed Bodies

**Appendix C** - Pre-Draft Consultation Strategy Report

**Appendix D** – Development Plan timetable

**Appendix E** – Summary of Submissions



# APPENDIX-A

## NOTICE OF THE INTENTION TO REVIEW THE SOUTH DUBLIN COUNTY DEVELOPMENT PLAN 2016 – 2022 AND TO PREPARE A NEW SOUTH DUBLIN COUNTY DEVELOPMENT PLAN 2022 – 2028

**Notice is hereby given** in accordance with Part 2 Section 11(1) of the Planning and Development Act 2000 (as amended) that South Dublin County Council intends to review the existing South Dublin County Development Plan 2016 – 2022 and to prepare a new South Dublin County Development Plan 2022 – 2028. The new County Development Plan will be strategic in nature for the purposes of developing (a) the objectives and policies to deliver an overall strategy for the proper planning and sustainable development of the area of the Development Plan (South Dublin County) and (b) the Core Strategy. It will also take account of 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.

### STRATEGIC ENVIRONMENT ASSESSMENT AND APPROPRIATE ASSESSMENT

In compliance with the Strategic Environmental Assessment Directive (2001/42/EC) and accordance with Article 13B of the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436/2004) (as amended), the Planning Authority proposes to carry out a Strategic Environmental Assessment (SEA) as part of the review of the existing Development Plan and preparation of a new Development Plan. For this purpose, the Planning Authority will prepare an Environmental Report of the likely significant effects on the environment of implementing the new Plan. The provisions of Articles 13C to 13J of Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004) (as amended) shall also apply.

Pursuant to the requirements of Article 6 of the Habitats Directive (92/43/EEC), a Stage One Screening for Appropriate Assessment (AA) shall be carried out as part of the overall process and subsequent stages of AA shall be carried out, if required.

### PUBLIC CONSULTATION

The Public Consultation will take place between:

**Friday 31st July 2020 to Monday 28th September 2020 (inclusive).**

The Council is encouraging members of the general public, local businesses, resident's associations, community organisations and schools to have a say in influencing and helping to frame the general direction the next County Development Plan might take. Public inputs at the start of the Plan-making process are vitally important to ensure the finished Plan reflects public concerns and aspirations.

Information, including a booklet of the issues facing the county, is available to download from the website [www.sdcc.ie/en/devplan2022/](http://www.sdcc.ie/en/devplan2022/) and will be available at various locations within the county including public libraries.

**A series of Public Information Sessions are scheduled for the following dates:**

Public Information Sessions	Date	Time
Public Webinar*	Thurs 3rd September	11.00am
Public Webinar*	Wed 16th September	7.00pm
By Appointment Only: Telephone Call / Drop-in at the Planning Counter, County Hall, Tallaght. Maximum 15-minute timeslot. To book appointment with a planner please email <a href="mailto:devplan@sdublincoco.ie">devplan@sdublincoco.ie</a>	August Tuesday: 4th, 11th, 18th, 25th September Tuesday: 1st, 8th, 15th, 22nd	1.00pm - 4.00pm
Tallaght Library	Wed 26th August Thurs 17th September	2.00pm - 5.00pm

\*Details on the Webinar and any other events will be provided on the council website within the latest news section [www.sdcc.ie/en/devplan2022/](http://www.sdcc.ie/en/devplan2022/) and social media.

### SUBMISSIONS/OBSERVATIONS

Making a submission is simply a way for you to give us your **thoughts and ideas** on what you think are the important things in planning for the future growth of South Dublin and your neighbourhood.

South Dublin County Council hereby invites any interested parties to make submissions or observations with regard to the review of the existing South

Dublin County Development Plan 2016 – 2022 and the preparation of the new South Dublin County Development Plan 2022 – 2028 including the SEA and AA process.

In respect of making a submission or observation please note the following:

- Submissions/observations at this stage of the overall Plan-making process should be strategic in nature and focus on 'big picture' issues. Visit our website to get more information on these issues.
- Children or groups or associations representing the interests of children, are particularly encouraged to make submissions or observations regarding the foregoing.
- The Council **cannot** consider at this Pre-Draft stage of the County Development Plan process submissions or observations relating to the zoning and/or re-zoning of specific or particular parcels of land. These more detailed matters will be considered during the Draft Plan stage of the overall process – which is approximately 12 months away.
- Submissions/observations should include your name, and where relevant details of any organisation, community group or company etc., which you represent. These details will be published in the Chief Executive's Report and online. Your address/email address will be used for correspondence purposes only and will be redacted if included in the submission.
- Please be advised that all submissions received will be published online in accordance with the requirements of the Planning Act. You should ensure that no vexatious, libellous or confidential information, including confidential information in relation to a third party (in respect of which the third party has not, expressly, or impliedly in the circumstances, consented to its disclosure) is included in your submission. The Planning Authority reserves the right to redact any submission or part thereof.

A submission can be made online via:

[www.sdcc.ie/en/devplan2022/](http://www.sdcc.ie/en/devplan2022/)

or

<https://consult.sdublincoco.ie/browse>

Or

by post, addressed to:

**Senior Executive Officer, Forward Planning Section, Land Use Planning and Transportation Department, County Hall, Tallaght, Dublin 24, D24 A3EX.**

**NOTE:** Please make your submission by **one** medium only i.e. post/online. Email submissions will not be accepted.

**The final date for receipt of submissions is 4.00pm by post on Monday 28th September 2020 and 11.59pm on Monday 28th September 2020 online.**

Please note late submissions will not be considered.

### Important Note Regarding Submissions:

In accordance with Section 11 (3A)(a) of the Planning and Development Act, 2000 (as amended), written submissions or observations received by a Planning Authority under this section shall be published on the website of the authority within 10 working days of its receipt by that authority.

**Mick Mulhern, Director of Services**  
**Land Use Planning and Transportation Department,**  
**County Hall,**  
**Tallaght,**  
**Dublin 24. D24 A3EX**

**Tel: 01 414 9000**  
**Web: [www.sdcc.ie](http://www.sdcc.ie)**



# APPENDIX B

## Prescribed Bodies:

- Eastern & Midlands Regional Assembly, 3<sup>rd</sup> Floor North, Ballymun Civic Centre, Dublin 9 D09 C8P5
- Dublin City Council, Civic Offices, Wood Quay, Dublin 8 D08 RF3F
- Dun Laoghaire Rathdown County Council, County Hall, Marine Road, Dun Laoghaire, Co. Dublin
- Kildare County Council, Áras Cill Dara, Devoy Park, Naas, Co. Kildare
- Wicklow County Council, County Buildings, Whitegates, Wicklow Town
- Fingal County Council, County Hall, Main Street, Swords, Dublin K67 X8Y2
- Forfás, Department of Jobs, Enterprise & Innovation, 23, Kildare Street, Dublin D02 TD30
- Dublin Airport Authority, Head Office, Old Central Terminal Building, Dublin Airport, Co. Dublin
- Minister for Education & Skills, Department of Education & Skills, Marlborough Street, Dublin 1
- Environmental Health, Health & Wellbeing Division, HSE, Oak House, Limetree Avenue, Millennium Park, Naas, Co. Kildare
- Minister for Communications, Climate Action and Environment Transport & Sport, Department of Communications, Climate Action, 29 – 31, Adelaide Road, Dublin 2
- Transport Infrastructure Ireland, Land Use Planning Section, Parkgate Business Park, Parkgate Street, Dublin 8 D08 YFF1
- National Transport Authority, Dún Scéine, Harcourt Lane, Dublin 2 D02 WT20
- Minister for Culture, Heritage & the Gaeltacht, Department of Culture, Heritage & the Gaeltacht, 23, Kildare Street, Dublin 2
- An Taisce – The National Trust for Ireland, Taylor’s Hall, Back Lane, Dublin 8 D08 X2A3
- The Arts Council, 20, Merrion Square, Dublin 2 D02 NY52
- Fáilte Ireland, 88-95, Amiens Street, Dublin 1 D01 WR86
- The Heritage Council, Church Lane, Kilkenny, Co. Kilkenny R95 X264
- Inland Fisheries Ireland, 3044, Lake Drive, Citywest Business Campus, Dublin 24 D24 Y265
- The Health & Safety Authority, The Metropolitan Building, James Joyce Street, Dublin 1 D01 K0Y8
- Irish Aviation Authority, The Times Building, 11 -12, D’Olier Street, Dublin 2
- Environmental Protection Agency, PO Box 3000, Johnstown Castle Estate, Co. Wexford Y35 W821
- Irish Water – Forward Planning, Asset Strategy & Sustainability, PO Box 6000, Dublin 1
- Minister for Housing, Planning & Local Government, Custom House, Dublin 1 D01 W6X0
- An Bord Pleanála, 64, Marlborough Street, Dublin 1 D01 V902

- Minister for Agriculture, Food & the Marine, Climate Change Section, Johnstown Castle Estate, Co. Wexford
- Taoiseach & Minister for Defence, Station Road, Newbridge, Co. Kildare
- Eirgrid, The Oval, 160, Ballsbridge Road, Dublin 4 D04 FW28
- ESB (Electric Ireland), PO Box 841, South City Delivery Office, Cork T12 C825
- Waterways Ireland, 2, Sligo Road, Enniskillen, Co. Fermanagh BT74 7JY
- Department of Public Expenditure & Reform with special responsibility for the Office of Public Works and Flood Relief, Government Buildings, Upper Merrion Street, Dublin 2 D02 R583
- Tánaiste & Minister for Business Enterprise & Innovation, Department of Business Enterprise & Innovation, Kildare Street, Dublin 2
- Minister for Transport, Tourism & Sport, 44, Kildare Street, Dublin 2
- Office of the Planning Regulator, Block C, 77, Sir John Rogerson's Quay, Grand Canal Dock

# PRE-DRAFT CONSULTATION

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Strategy Report  
31<sup>st</sup> July – 28<sup>th</sup> Sept 2020

November 2020

# Pre-Draft Public Consultation Strategy Report

## Contents

1. Why Public Consultation?
2. Consequences of Covid Legislation on the Public Consultation Process 2020-2028
3. CDP 2022-2028 Pre-Draft Consultation Strategy Overview

### WHY PUBLIC CONSULTATION?

1. The Planning and Development Act (as amended) requires the following: 'a planning authority shall take whatever additional measures it considers necessary to **consult** with **the general public** and other **interested bodies**' S11(3)(a) and 'a planning authority shall hold **public meetings** and seek written submissions' S11(3)(b).
2. To encourage dialogue with affected parties and encourage ownership of the document:
  - a. Public consultation allows for engagement between the Council and people/bodies affected by the implementation of the Plan and the policies it contains.
  - b. By involving people with a stake hold in the County at an early stage in the process they may be encouraged to take ownership of the document and ultimately their compliance with the policy within.
  - c. Providing customer service and strengthening public relations.

### CONSEQUENCES OF COVID LEGISLATION ON THE PUBLIC CONSULTATION PROCESS 2020-2028

The Public Consultation Strategy for the South Dublin Development Plan 2016-2022 comprised human interaction: meeting people face to face, round table discussions, crowded rooms and busy places. In 2020, with legislation/guidelines reducing and prohibiting human interaction the public consultation for the Pre-Draft of the County Development Plan had to become more innovative in its approach.

Two Teams-Think-Tanks (15-30minutes long) were held: the first on the afternoon of 13<sup>th</sup> May 2020 with members of the County Development Team and the second was held on the



morning of 14<sup>th</sup> May 2020 with members of the Development Management team to brainstorm different approaches to public consultation.


## **COUNTY DEVELOPMENT PLAN 2022-2028 PRE-DRAFT CONSULTATION STRATEGY**

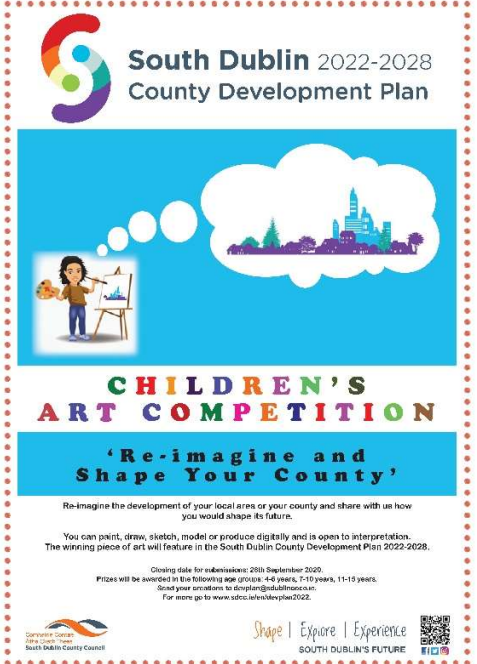

### **Overview**

The accepted Public Consultation Strategy was based on the minimum statutory requirements, complemented by the experiences of past public consultations, the findings of the Think-Tanks and took into consideration legislation relating to Covid. It comprised the following steps:

1. Branding
2. Issues Papers
3. Mayor's Launch Day
4. Internet Presence
5. Submissions Portal
6. Social Media Campaign
7. Webinars
8. Stakeholder Meetings
9. PPN Community Involvement
10. Art Competition
11. Open sessions
12. Promotion/Advertisement

Strategy Steps	Description
Branding	<p>A strong, modern and distinct branding, including logo, has been created to represent and define the County Development Plan. This branding will be used on all media relating to the plan.</p>  <p><b>South Dublin 2022-2028</b> County Development Plan</p>
Issues papers	<p>The Issues Papers were desktop published under 8 main themes and neighbourhoods within the County. The papers were highly coloured, used images and iconography cleverly to complement the important text. The purpose was to create a visually appealing document, reaching out to all that read it. This was deemed to be very important to ensure that the information was made available to everyone, including those who may not be comfortable using technology.</p>  <p><b>Next Steps:</b></p> <p>For more information scroll through the website homepage and stage below: <a href="http://www.sdcc.ie/en/devplan2022">www.sdcc.ie/en/devplan2022</a></p> <p>To make a submission click on the make a submission link or go to: <a href="http://www.sdcc.ie/en/devplan2022">www.sdcc.ie/en/devplan2022</a></p>
Internet Presence	<p>A web page was created to publish all information associated with the County Development Plan, including links to where other details could be found.</p> <p>A Virtual Room was created, enticing people to enter to view posters, information on the 8 themes contained within the Issues Papers and to contact planning staff via a dedicated phone line. The phone line was opened up on Thursday evenings during the consultation.</p>
Mayors Launch	<p>The pre-draft public consultation of 2022-2028 County Development Plan commenced with the Mayor's launch on the 31<sup>st</sup> July 2020. The launch was</p>

	<p>livestreamed via Facebook and Instagram. It was also recorded and uploaded to the website for viewing.</p> 
Submissions Portal	Produced by CiviQ and managed by the CDP team. The Submissions Portal was created to be user friendly, encouraging users to make submissions online rather than via historic means such as e-mail and post.
Social Media Campaign	A social media campaign was created. It engaged with 4 separate mediums: Twitter, Facebook, Instagram and LinkedIn. Councillors were encouraged to engage in this process by agreeing to disseminate information across their social media accounts and to their constituents.
Webinars	Two Public Webinars were held during September (A morning webinar on Thursday 3 <sup>rd</sup> September and an evening webinar on 16 <sup>th</sup> September 2020). The webinars were hosted by planning staff and comprised presentations undertaken by relevant SDCC staff covering all 8 themes contained within the Issues Papers. The webinars ended with a questions and answers session. Fifty-four people attended the first webinar, and 73 questions were raised. Forty-seven people attended the second webinar, which raised 78 questions.
Stakeholder Meetings	Six Stakeholder Webinars were organised. The purpose of these webinars was to facilitate a cross sector discussion in relation to the medium to long term future of South Dublin County and the 'big picture' issues that might impact on its future growth. [For further information refer to the Stakeholder Consultation Report]
PPN Collaboration	Planning staff collaborated with the PPN to reach out to their 3 pillars and associated groups: Environment, Social Inclusion and Community and voluntary. PPN encouraged their groups to attend events/webinars held.

Art Competition	<p>Planning staff in collaboration with the Arts Officer and the Community Department organised an Arts Competition for young people to encourage youth engagement in the development plan process.</p> 
Open Sessions	<p>Open sessions with planners were organised on Tuesday afternoons during the consultation period. These were organised by appointment only.</p> <p>Open sessions with planners were organised on 26<sup>th</sup> August 2020 and Thursday 17<sup>th</sup> September 2020 at Tallaght Library. These were on a drop-in basis and gave the public access to planners without having to book a timeslot.</p>
Promotion/Advertisement	<p>Printed Media:</p> <ul style="list-style-type: none"> <li><b>Statutory Requirement:</b> Newspaper Notices printed in local and national newspapers.</li> </ul> 

- **Citizens Newsletter** - dropped to every household in the County two weeks before the launch. It contained an article on the upcoming public consultation and how the public could engage with the process
- **Eight weekly Articles in The Echo Newspaper:** Over the course of the 8-week public consultation the Echo published 8 separate articles (one each week) that discussed each of the Themes of the Plan in turn.



#### Poster Campaign

- **Bus Stop Advertisements** - SDCC has the use of 25 Bus Shelters to advertise and these were used during the consultation. Eye catching posters were specially designed to be erected in each of the 25 carefully chosen bus stop. The bus stops were chosen for their location and frequency of use.
- The posters, designed for the bus stop advertising campaign, were erected in libraries, post offices, community centres, credit unions throughout the County and were also issued to the PPN for dissemination.





# APPENDIX D

## The Process Timeline



	Stage	Stage Description	Process	Timeframe
1	Pre-Draft		Pre-draft starts Public Consultation	31st July 2020 –28th Sept 2020
			Prepare Chief Executives Report on Pre-Draft Submissions	8 Weeks <b>CE Report November 2020</b>
			<b>Councillors Consider Chief Executive's Report on Submissions and make directions</b>	<b>10 weeks</b> <b>By 4th February 2021</b>
			Preparation of Chief Executive's Draft Plan	12 Weeks
			Councillors Consider Chief Executive's Draft Plan and deem it to be the Draft Plan unless amended	8 Weeks <b>By late June 2021</b>
2	Draft Plan		Preparation of Draft County Development Plan	2 Weeks
			<b>Draft Plan Public Consultation</b>	10 Weeks <b>July 2021–Sept 2021</b>
			Prepare Chief Executive's Report on Draft Plan Submissions	12 Weeks <b>CE Report December 2021</b>
			Councillors Consider Chief Executive's Report on Submissions. Councillor's now ADOPT or AMEND Draft Plan	12 Weeks <b>By March 2022</b>
3	Amend-ments to Draft Plan		Preparation of Amendments to Draft Plan	3 Weeks (or more if required by AA or SEA) <b>By early March 2022</b>
			<b>Amendments Public Consultation</b>	<b>4 weeks</b> <b>March–April 2022</b>
			Preparation of Chief Executives Report on Submissions	4 Weeks
			Councillors Consider Chief Executive's Report on Submissions. Plan must now be MADE	6 Weeks <b>June 2022–Plan Made</b>
4	Adopted Plan		South Dublin County Development Plan comes into effect	6 weeks <b>Plan Effective August 2022</b>

**Note: Exact dates may change over the course of the process**





# Appendix E

## Summary of Submissions

### Table of Contents

#### Summary of Submissions relating to Strategic Themes

1. Built Environment and Placemaking
2. Climate Action and Energy
3. Population Growth and Housing
4. Sustainable Movement
5. Community Services
6. Economic Development
7. Natural Heritage and Biodiversity
8. Infrastructure and Utilities
9. Miscellaneous (including Zoning Submissions)

#### Summary of Submissions relating to the Neighbourhood Areas

1. Citywest/Saggart/Rathcoole/Newcastle
2. Clondalkin/Clonburris/Grangecastle
3. Lucan/Palmerstown/Adamstown
4. Naas Road
5. Rural Uplands
6. Tallaght
7. Templeogue/Walkinstown/Rathfarnham/Firhouse



## Summary of submissions relating to Strategic Themes

### Built Environment and Placemaking

#### Physical Aspects

1. Dublin Chamber requests support within the County Development Plan for its published Dublin: The 15 Minute City report. The 15 Minute City is an urban planning concept focusing on community planning, the local economy, and the liveability of a city. Creating a 15 Minute City is about designing walkable communities in which people can live and access most of their daily needs within 15 minutes of active transport, i.e. walking or cycling. The Chamber requests:
  - Establishment of a 15 Minute City pilot programme to establish learnings and identify implementation issues arising from such an ambitious plan.
  - Use of the Local Area Plan and Strategic Development Zone models to deliver the 15 Minute City vision and to encourage further development and regeneration in built parts of the city.
  - A review to identify parts of South Dublin that have a particular shortage of the facilities essential to creating a 15 Minute City, particularly greenspace and public transport.
  - Particular focus given to areas at the edge of the Local Authority's boundary. Co-ordination with Dún Laoghaire-Rathdown, Dublin City, Fingal, Kildare and Wicklow Local Authorities is essential in these areas.
  - The investigation of the Naas Road as a prime opportunity to enable the 15 Minute City vision.
  - The recognition of town centres as a vital feature of the 15 Minute City. ([SD-C147-156, Dublin Chamber](#))
2. Request the new Written Statement of the Development Plan considers the Contents of the 'How Walkable is Your Town?' report by Age Friendly Ireland and Centre for Excellence in Universal Design at the National Disability Authority. ([SD-C147-174, National Disability Authority](#))
3. The submission suggests the Council develop the concept of 15-minute city, each village becomes a central hub within 15 minutes of active travel time from residents. Centre of villages should be design for use by pedestrians, active travel, and public transport modes. This concept will promote compact growth. ([SD-C147-94, Elizabeth Hickey](#))
4. Remote working should be supported by creating hubs, changes to house designs, focus on compact growth, improve public and active travel infrastructure. ([SD-C147-106, Green Party Tallaght](#))
5. Identify 30-40 villages or areas across SDC and make them 15-minute city and people can go to these areas for grocery shopping, community events, socialise and carry out basic day to day living. ([SD-C147-141, Ross O'Mullane](#))

6. The Development plan should promote the development of sustainable mixed-use communities with easy access to services and facilities while also promoting the development of publicly owned renewable energy resources. ([SD-C147-56, Paul Murphy](#))
7. Are there underutilised landbanks which may benefit from master planning and community focused design which is focused on the 10-minute city model based on Regional Planning Policy? Such developments can provide for a range of commercial activity, services, community infrastructure, education, and residential use at sites that benefit from good access to transport infrastructure and thus sustainable journeys. ([SD-C147-63, Hibernia REIT](#))
8. The submission refers to the banking up of topsoil around industrial building sites to form a boundary, usually planted with trees, such as in Grange Castle. It questions whether if industrial buildings have their own architectural merit, should this value not be visible to the community? ([SD-C147-49, Niall Charleton](#))
9. The impacts of Covid-19 should influence strategic planning going forward. Residential/ urban design and layouts should be revisited to allow for adequate space for social distancing and increased green and outdoor space for health and safety purposes. ([SD-C147-157, Yvonne Collins](#))
10. The proximity of public transport links should be a primary consideration in any place-building project. Developments should be created to ensure that sustainable modes will be prioritised, as such, cycle tracks, adequate footpath space and a low level of car parking space availability should be standard in any place-making project. ([SD-C147-95, Dublin Bus](#))
11. Housing development design should encourage the use of the local public transport links which should be invested in to ensure there is sufficient capacity and frequency to handle this increased demand. ([SD-C147-95, Dublin Bus](#))
12. High density living needs effective estate management companies supported by planning and legal framework. ([SD-C147-17, Rathcoole Community Council](#))
13. Planning Conditions which establish an Operating Management Company (OMC) should include time limits on when a developer should hand over control of the OMC to residents and/or for taken in charge by SDCC to avoid a deterioration of quality of life for all and lack of funds to manage an estate. Conditions should also require the estimated annual service charges. ([SD-C147-17, Rathcoole Community Council](#))
14. Consideration of how individual houses (freehold) within a high-density mixed estate are managed when the house is legally independent from the OMC in enforcing original estate design / boundaries. ([SD-C147-17, Rathcoole Community Council](#))
15. SDCC multi-unit task force that is used to address issues with Council Tenants is made available to OMC directors to advise and support them in the management of anti-social households. ([SD-C147-17, Rathcoole Community Council](#))
16. Planning regulations should insist that all units in high density mixed housing estates should be purchased under leaseholder title only, and that SDCC recognise the need to consult with an estates OMC to control and maintain minor breaches in planning

resulting in a poor the quality of life of residents. ([SD-C147-17, Rathcoole Community Council](#))

17. Submission would welcome an increased use of the derelict sites register, to improve the aesthetics of the county and unlock revenue. ([SD-C147-96, Public Participation Network](#))
18. The LDA supports the emphasis on placemaking and the need to deliver higher density mixed-use developments appropriate to their location in terms of type, scale, form and density, that is more compact and liveable to reduce urban sprawl is in line with the LDA's vision. ([SD-C147-227, Land Development Agency](#))
19. Planters should be installed to act as barriers and decorate streets to brighten up public spaces with associated street lighting. ([SD-C147-198, Carly Bailey](#))
20. DoAHG recommends the inclusion of an objective whereby all public buildings and public open spaces in the county would incorporate positive biodiversity measures as standard practice such as nesting boxes for swifts, bat boxes and/or bat bricks, the creation of wildlife habitats on public open spaces. ([SD-C147-143, Dept. of Arts, Heritage and the Gaeltacht](#))
21. Suggests ways of improving neighbourhoods: nice paving & lighting, better traffic management, a library, a 50-metre swimming pool, hanging baskets, playground, seating, better parking, improvements to buildings, remove big ad hoardings, give tax breaks for, dedicated space for temporary traders, a farmers market type area, a focal point such as sitting area, fountain, monument, statue, good transport facilities, a festival and other community events, more facilities for people of all ages. Provide more public art such as on electricity and traffic boxes, walls and gable ends, bus stops and so on, with dedicated areas and grants for artists. Encouragement of scheme similar to tidy towns across SDC that focuses more on neighbourhoods and estates rather than towns. It is also suggested that the Local Authority create its own app so people can interact more with the Council. The same submission also calls for the Local Authority to follow up on issues raised using the 'Fix My Streets' website. ([SD-C147-141, Ross O'Mullane](#))
22. The submission requests for additional public lighting along Garter's Lane and Castle Road. ([SD-C147-168, Saggart Village Residents' Association](#))
23. DoAHG notes that policy 5 in the current plan requires all new developments to use LED bulbs in all external lighting. The colour of the spectrum produced by LED installations should be considered when specifying and installing exterior lighting. In keeping with Dark Sky Ireland Lighting Recommendations, it is suggested that, as a general rule, LED luminaires with warmer colours (i.e., CCT values at or below 2700K) be specified for future installations to avoid environmental impacts associated with blue-rich LED light. ([SD-C147-143, Dept. of Arts, Heritage and the Gaeltacht](#))
24. The OPR notes the standards for apartment development in Chapter 2 Housing and Chapter 11 Implementation of the current development plan and advises that some of the standards and requirements are not consistent with the updated section 28 'Sustainable Urban Housing; Design Standards for New Apartments, Guidelines for Planning Authorities (2018). In this regard, Specific Planning Policy Requirements 1-6 (inclusive) of these guidelines should inform the development management

standards for apartment development in the forthcoming development plan including requirements for, inter alia, mix of unit types, minimum floor areas, building height and building separation distances. Reference is also made to the provisions of the guidelines in regard to replacement of 'general blanket restrictions on building height or building separation distances and with more performance-based criteria appropriate to location as supported by the NPF. The OPR makes further reference to the current plan provisions in regard to restricted building heights on lands zone RES-N. ([SD-C147-144, Office of the Planning Regulator](#))

25. The submission suggests having minimum building standards for sustainable metrics. ([SD-C147-106, Green Party Tallaght](#))
26. TII request that on national roads and roads running parallel to national roads, and along the Luas line, the erection of signage needs to be tightly regulated for road and rail safety and environmental reasons. The following documents are referred to:
  - TII Policy on the Provision of Tourist & Leisure Signage on National Roads (March 2011);
  - Section 3.8 of the DoECLG's Spatial Planning and National Roads Guidelines which indicates a requirement to control the proliferation of non-road traffic signage on and adjacent to national roads;
  - TII's Code of engineering practice for works on, near, or adjacent the Luas light rail system'.
27. The Authority would welcome the provisions of the TII Policy and the DoECLG Guidelines incorporated into the new Development Plan. ([SD-C147-36, Transport Infrastructure Ireland](#))
28. Calls for root and branch review of all signage and remove anything that not required. ([SD-C147-141, Ross O'Mullane](#))
29. Calls for the high-density housing that is planned for the REGEN area in Tallaght to be very high quality and an attractive place where people would want to live. ([SD-C147-203, Betsy Omidvaran](#))
30. Potential to be an exemplar for urban-rural transitional building design including infrastructure, rather than a dormitory suburb in the Greater Dublin region. ([SD-C147-16, Alan Fairman, Rathcoole Community Council](#))

## **Cultural Aspects**

1. The literature fails to mention the restoration of key structures of historical and recreational interest. ([SD-C147-52, Vincent Hyland](#))
2. Support the Save the Silver Bridge campaign that is asking for the council to act on the restoration of this iconic structure. ([SD-C147-52, Vincent Hyland](#))
3. Architectural Conservation Areas: I would like to request that the 2 Cottages no. 10 & 11 Old Bawn Road be assessed and included on the Record of Protected Structures and recommended as ACA's as examples of 20th Century Local Authority Housing. ([SD-C147-133, Teresa Costello](#))

4. Identify historical buildings in disrepair and establish a mechanism to force owners to preserve them. ([SD-C147-87, Deirdre Tierney](#))
5. This submission relates to the refurbishment of Silver Bridge between Strawberry Beds and Waterstown Park. ([SD-C147-59, Fergal Swaine](#))
6. The refurbishment/re-building of Silver Bridge. Submission highlights that a feasibility study has been carried out but momentum on this project should continue as the benefits of the refurbishment will have many positive effects for the areas heritage, as well as creating connectivity with other local authorities. ([SD-C147-165, Jonny Edgar](#))
7. Can the Development Plan making process consider the identification of longer-term options for Heritage Buildings in terms of adaptation for uses such as social, community, commercial, tourism etc.? ([SD-C147-63, Hibernia REIT](#))
8. DoCHG recommends that every Development Plan have within it a stand-alone dedicated 'Archaeological Heritage' Chapter within the plan and sets out the recommended policies and objectives for inclusion in same. ([SD-C147-143, Dept. of Culture, Heritage and the Gaeltacht](#))
9. Calls for SDCC to appoint more full-time resources to heritage in the lifetime of the next Plan. ([SD-C147-194, Tallaght Community Council](#))
10. Calls for a new register of Rights of Way; new register of trees with Tree Protection Orders and new register of Protected Structures. ([SD-C147-190, Eoin Ó Broin](#))
11. Recommendation in relation to Heritage, Conservation and Landscapes (HCL) Policy 1 Overarching and associated provisions in the existing Plan. ([SD-C147-222, Keep Ireland Open](#))
12. Recommendation in relation to Heritage, Conservation And Landscapes (HCL) Policy 2 Archaeological Heritage and associated provisions in the existing Plan. ([SD-C147-222, Keep Ireland Open](#))
13. Recommendation in relation to Heritage, Conservation And Landscapes (HCL) Policy 7 Landscapes and associated provisions in the existing Plan. ([SD-C147-222, Keep Ireland Open](#))
14. Recommendation in relation to Heritage, Conservation And Landscapes (HCL) Policy 10 Liffey Valley and Dodder Valley and associated provisions in the existing Plan. ([SD-C147-222, Keep Ireland Open](#))
15. Recommendation in relation to Heritage, Conservation And Landscapes (HCL) Policy 11 Grand Canal and associated provisions in the existing Plan. ([SD-C147-222, Keep Ireland Open](#))
16. Recommendation in relation to Heritage, Conservation And Landscapes (HCL) Policy 12 Natura 2000 Sites and associated provisions in the existing Plan. ([SD-C147-222, Keep Ireland Open](#))
17. Recommendation in relation to Heritage, Conservation And Landscapes (HCL) Policy 13 Natural Heritage Areas and associated provisions in the existing Plan. ([SD-C147-222, Keep Ireland Open](#))

18. Recommendation in relation to Heritage, Conservation And Landscapes (HCL) Policy 14 Liffey Valley SAAO and associated provisions in the existing Plan. ([SD-C147-222, Keep Ireland Open](#))
19. Recommendation in relation to Heritage, Conservation And Landscapes (HCL) Policy 15 Non-Designated Areas and associated provisions in the existing Plan. ([SD-C147-222, Keep Ireland Open](#))
20. Recommendation in relation to Heritage, Conservation And Landscapes (HCL) Policy 16 Public Rights of Way and Permissive Access Routes and associated provisions in the existing Plan. ([SD-C147-222, Keep Ireland Open](#))
21. Recommendation in relation to Heritage, Conservation And Landscapes (HCL) Policy 19 Geological Sites and associated provisions in the existing Plan. ([SD-C147-222, Keep Ireland Open](#))
22. Recommendation in relation to Implementation, namely 11.5.5 Landscapes. ([SD-C147-222, Keep Ireland Open](#))
23. All protected structures throughout the county should be maintained and protected.
  - A dedicated chapter should be outlined in the current development plan which relates to cultural, archaeological and architectural heritage.
  - The Rathcoole woodlands should be protected at all costs. ([SD-C147-169, South Dublin Conservation Society](#))
24. Heritage (Built): Kimmage Manor House, the interior and lands surrounding the house should be included in the description of this site on the Protected Structures list. ([SD-C147-171, Records Residents Association](#))
25. The Poddle river should be protected from culverting in the future, historical mills are located in the immediate area. ([SD-C147-171, Records Residents Association](#))
26. Submissions have called for reuse or adaptation of existing protected structures to alternative uses in order to provide continued security of the heritage value of these buildings, attendant grounds and associated natural features and have also sought Specific Local Objectives relating to same within the new County Development Plan ([SD-C147-226, Brock McClure](#))
27. Submissions have called for reuse or adaptation of existing protected structures to alternative uses in order to provide continued security of the heritage value of these buildings, attendant grounds and associated natural features and have also sought Specific Local Objectives relating to same within the new County Development Plan ([SD-C147-126, Simon Clear & Associates](#))
28. Submission highlights the County's motto 'This we hold in Trust', that our natural and built heritage should be protected, preserved, and promoted and it referred to several examples within the county. ([SD-C147-202, Cllr Alan Hayes](#))
29. Submission suggests villages and towns should have a focal point to hold festivals, farmer markets and cultural activities from these spaces and promote Dublin Canvas Project. ([SD-C147-198, Carly Bailey](#))



30. Support the promotion of the Irish language in the County. There are many people with Irish and many wanting to learn Irish. ([SD-C147-190, Eoin Á" Broin](#))
31. Calls for increased efforts to encourage the use of the Irish language such as by only using Irish names on streets and estates and encourage Irish names on shop fronts. ([SD-C147-82, Declan Hanley](#))

## **Social Aspects**

1. Request that there should be a greater emphasis on creating liveable and sustainable neighbourhoods, where persons with disabilities can live full and active lives as part of a real community. ([SD-C147-174, National Disability Authority](#))
2. Promote Traveller culture ([SD-C147-141, Ross O'Mullane](#))
3. The submission notes that the Plan should take cognisance that public space and infrastructure needs to be planned with accessibility and inclusion in mind. Accessibility for more vulnerable members of the community need to be prioritised, which includes seating and tactile paving. ([SD-C147-96, Public Participation Network](#))
4. Submission requests that the CEUD's Universal Design guidelines, should become the minimum standard for new social housing build projects. ([SD-C147-174, National Disability Authority](#))
5. Request the new Written Statement of the Development Plan considers the Contents of the 'How Walkable is Your Town?' report by Age Friendly Ireland and Centre for Excellence in Universal Design at the National Disability Authority. ([SD-C147-174, National Disability Authority](#))



## Climate Action and Energy

### Active Transport Climate Specific

1. The LDA welcomes the approach to Climate Action in making better use of land resources, maximising adaptive re-use opportunities, promotion of compact, mixed use development with better use of sustainable transport options especially along key corridors and at key nodes. ([SD-C147-227, Alan Kelly, Land Development Agency](#))

### Alternative Energy

1. The submission recommends expansion of PV solar to all new public buildings, plan for increase in electric vehicles, improve and expand public charging infrastructure and charging points at new homes and businesses. ([SD-C147-106, Green Party Tallaght](#))
2. Climate Action and Energy - Reducing consumption and increasing alternatives  
County is geologically suited to the development of geothermal energy. Solar energy parks are identified as a way for providing habitats for wildflowers and insects. Insulation of housing stock identified as a form of reducing energy consumption. ([SD-C147-61, Peter Byrne, South Dublin Chamber](#))
3. Gas Networks Ireland (GNI) suggests that the new South Dublin Development Plan reference renewable gas wherever renewable energy sources are being listed. ([SD-C147-108, Gas Networks Ireland](#))
4. GNI note that renewable gas was first introduced to the Irish gas grid through an injection point in County Kildare, supplied by Green Generation, in August 2019. ([SD-C147-108, Gas Networks Ireland](#))
5. GNI indicate that renewable gas is the lowest cost option to decarbonise the domestic heat sector base on a report by KPMG commissioned by Evria. ([SD-C147-108, Gas Networks Ireland](#))
6. The OPR commends the planning authority for its renewable energy initiatives, such as the Tallaght District Heating Project, and welcomes the proposals to establish similar in other areas.

The Office directs the attention of the Planning Authority towards the promotion of Renewable Energy sources within the County and the requirement for the planning authority to indicate how the implementation of its development plan over its effective period will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resource (in megawatts). This will also need to reflect the specific characteristics and constraints of the area noting the conclusion in the current development plan regarding large scale wind energy infrastructure. ([SD-C147-144, Maude Ni Bhrolchain, Office of the Planning Regulator](#))

## Climate Action

1. The focus in the Issues papers on Climate and Energy is welcomed, in keeping with the RSES Key Principle on Climate Action, supported by RSOs 6-11.

The submission sets out that the information contained at Chapters 4, 7, 8 and 10 of the RSES will also assist the Local Authority in developing an integrated climate policy, in particular Section 7.9 Climate Change and the related RPOs address the need for decarbonisation of the transport, built environment and energy sectors. The Council is also directed to Section 10.3 'Energy' and the Guiding Principles to support the roll out of smart grids and future energy networks enabling the promotion of renewable energy sources, in line with RPO 10.19.

The future CDP will also be required to include measures to assess and monitor progress on carbon reduction targets, in line with RPO 3.6 of the RSES. To this end, it should be noted that EMRA is leading an ESPON EU research programme (QGasSP) to identify a robust method for quantifying the relative GHG impacts of alternative spatial planning policies, the outputs of which may inform the upcoming review of the development plan. ([SD-C147-31, Pauline Riordan, EMRA](#))

2. The OPR highlights the requirements under section 31AM(2)(a) to address, in particular, matters within the scope of section 10(2)(n) of the Act and identifies that the transition to a low carbon economy and the overall reduction in carbon emissions will become a central issue for planning policies during the preparation of the plan. ([SD-C147-144, Maude Ni Bhrolchain, Office of the Planning Regulator](#))
3. Ban single use plastics in the County by 2024. Aim to be Carbon Neutral CoCo by 2028 ([SD-C147-141, Ross O'Mullane](#))

## Climate Action - General/Strategic

1. In preparing the draft County Development Plan, Coillte request that the Council promote the use of sustainable timber products in the Development Plan policies and objectives. ([SD-C147-53, Aoife McCarthy, Coillte](#))
2. The County Development Plan should ensure a rapid phasing out of all fossil fuels including gas, should not allow the expansion of the gas grid and should ban fracked gas in its energy mix. ([SD-C147-186, Aideen O'Dochartaigh, Not Here Not Anywhere](#))
3. Outside the development of this plan, the council should lead annual local climate dialogues which serve to inform communities about the ongoing transition to a low carbon society and seek their opinions, ideas and consent. ([SD-C147-186, Aideen O'Dochartaigh, Not Here Not Anywhere](#))
4. The Climate Action and Environment office within the council must be adequately resourced, publicised and staffed. These offices should work closely with local communities to improve education and access to information around environmental issues, proactively engage in consultations and participatory processes which allow local people to have a say in the energy transition in their area ([SD-C147-186, Aideen O'Dochartaigh, Not Here Not Anywhere](#))

5. Wherever practically possible, participatory processes should be designed in a participatory way, with input from representatives of all groups who are expected to take part in the participatory process. Special outreach efforts must be made to include disadvantaged or marginalised groups in participatory processes. Those running participatory processes should keep a detailed record of the participation of marginalised groups and of best practices that serve to increase this participation. ([SD-C147-186, Aideen O'Dochartaigh, Not Here Not Anywhere](#))
6. It considers the Plan should align with National Climate Change Mitigation & Adaption commitments set out in the 'Climate Action Plan 2019', 'Ireland's Greenhouse Gas Emissions Projections for 2018-2040' (EPA 2109) and 'Integrating Climatic Factors into the Strategic Environmental Assessment Process in Ireland' (EPA 2019). ([SD-C147-38, Cian O'Mahony, Environmental Protection Agency](#))
7. Submission raises concerns regarding potential impacts of climate change and impacts on future developments. Specific development management objectives are recommended and cognisance of the flood maps is required. ([SD-C147-41, Rachel Woodward, Office of Public Works](#))
8. The Council should make every effort to reduce the carbon emissions and energy usage in its capacity to deliver the services provided. Other suggestions include that the SDCC should encourage community energy projects, increase tree planting and biodiversity, reduce reliance on the car and encourage car-pooling and similar projects to enable this. ([SD-C147-73, Eugene Barrett, Knocklyon Network](#))
9. The Chamber requests that the new Development Plan support the sustainable compact growth of South Dublin and its transition to a low carbon, climate resilient, and high-density County playing an integral role in the Dublin region. The entire Dublin Metropolitan Area needs to focus on its resilience as a built-up urban area and commit to sustainable land management and resource efficiency to assist in the transition towards a low carbon society. ([SD-C147-156, Marian O'Donnell, Dublin Chamber](#))
10. The submission welcomes the Climate Change Action Plan (2019) and the new Development Plan to work together and recommend the following:
  - Ensure SDGs are at the core of our new Plan, in order to rebuild resilient communities,
  - Provide a feasibility study & zoning for provision of an Eco Village,
  - Planting of 'Stepping Stone Forests' of native species to act as biodiversity oases,
  - Provision of solar compacting litter bins in the county,
  - Provision of Reverse vending machines within the county, ([SD-C147-96, Kieran Walsh, Public Participation Network](#))
11. The South Dublin County Development Plan 2022-2028 presents a great opportunity to incorporate actions that will help in Ireland's overall efforts transition to a low-carbon economy by 2050, in line with the Paris Accord.

Calls on SDCC to set a target of planting three native trees and shrubs for every person in the County by the end of 2028, equating to approximately 1 million additional trees and shrubs. ([SD-C147-103, John Kiberd, Litter Mugs](#))

12. Submission suggests SDCC lead and engage citizens on climate change and biodiversity and work with central Government to enhance environmental enforcement capacity. ([SD-C147-106, Liam Sinclair, Green Party Tallaght](#))
13. The submission sets out that the plan in tandem with the required environmental processes, namely Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) offers an opportunity for additional assessment of greenhouse gas emissions subject to the availability of an agreed methodology at national level. ([SD-C147-31, Pauline Riordan, EMRA](#))
14. The submission sets out that the plan in tandem with the required environmental processes, namely Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) offers an opportunity for additional assessment of greenhouse gas emissions subject to the availability of an agreed methodology at national level. ([SD-C147-31, Pauline Riordan, EMRA](#))

## **Energy & Buildings**

1. Any data centre in SDCC area should be operated on a carbon neutral basis and their physical footprint kept to an absolute minimum. ([SD-C147-25, Thomas Gallagher](#))
2. The energy performance of our building stock should be enhanced to reduce costs to the end user. Government focus should, however, be on the decarbonisation of the energy grid where the greatest impact on climate change would be felt. ([SD-C147-75, Hugh Durkin Nigel Smith](#))
3. All-new large scale fossil fuel infrastructure projects are mandated to undertake climate impact assessment to ensure they are consistent with Ireland's fair share net cumulative carbon dioxide (CO2) quota in line with the Paris agreement or future equivalent ([SD-C147-186, Aideen O'Dochartaigh, Not Here Not Anywhere](#))
4. New data centres must be powered by onsite or new off-site renewable energy, with existing centres required to transition rapidly to onsite or new off-site renewables and where technically possible, heat recovered from Data Centres should be utilised for district heating systems. ([SD-C147-186, Aideen O'Dochartaigh, Not Here Not Anywhere](#))
5. Submission suggests the promotion of district heating systems, the use of nature based solutions to flooding, promote the use of biogas and solar and the use of electric vehicles for Council vehicles, provision of roof-top gardens on buildings and the installation of more water fountains and deposit schemes for recyclables. ([SD-C147-198, Carly Bailey](#))
6. The submission supports a drive towards climate action and more sustainable energy generation, including the performance of the building stock to reduce costs to the end user. Government focus should however; be on the decarbonisation of the energy grid where the greatest impact on climate change would be felt. ([SD-C147-74, Hugh Durkin](#))

7. Suggests retrofitting older housing stock and development of local energy sources within new residential developments to encourage sustainability, such as small wind turbines, to combat climate change. ([SD-C147-87, Deirdre Tierney](#))
8. The use of renewable gas avoids the need for deep retrofits to convert properties to a suitable BER rating for electric heat pumps to work effectively and should be a consideration for the Council when evaluating the options for decarbonising council housing stock. ([SD-C147-108, Fiona O'Connor, Gas Networks Ireland](#))
9. SDCC should work with all the businesses in the County to reduce Carbon emissions and Energy usage. This might be encouraged through different rate levels depending on your score on and energy /pollution scale. ([SD-C147-73, Eugene Barrett, Knocklyon Network](#))
10. The Council needs to work with Government/SEAI to deliver grants or assistance to homes to upgrade their BER to levels that will reduce amounts of heating required . ([SD-C147-73, Eugene Barrett, Knocklyon Network](#))
11. Suggest using energy created by data centre for supporting heating networks should be supported. ([SD-C147-94, Elizabeth Hickey](#))
12. Suggests residence to be encouraged and financially supported to retrofit their dwellings to improve energy efficiencies. ([SD-C147-94, Elizabeth Hickey](#))
13. DoCHG recommends that the policies and objectives set out in the 'Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage' are considered for inclusion in the South Dublin Development Plan. ([SD-C147-143, Manager Dau, Dept. of Arts, Heritage and the Gaeltacht](#))
14. Submission suggests that SDCC ensure our social housing uses innovative building methods and practices to mitigate impacts on climate and biodiversity. ([SD-C147-106, Liam Sinclair, Green Party Tallaght](#))
15. The submission raises concerns that commerce is a large contributor of carbon emissions. SDCC must insist on a 'carbon footprint declaration' and a plan for meeting Climate Action Plan targets for all industrial developments. It considers data centres are not suitable in our densely built County and should no longer be considered. ([SD-C147-106, Liam Sinclair, Green Party Tallaght](#))
16. Energy installations such as Leixlip Hydro Electric Station which are an integral part of our fight against climate change. There is a critical need for curtilage management and for the restriction of land uses, which might affect the ability for ESB consolidation and/or expansion as well as essential access, monitoring and maintenance. ([SD-C147-185, Electricity Supply Board](#) )
17. Support the delivery and continuation of a secure and resilient supply of energy that optimises the use of the renewable energy resources of the County to address climate change, support job creation and the move to a competitive low carbon Green Economy, while also protecting the environment and amenities of the county. ([SD-C147-185, Electricity Supply Board](#) )

## Energy Projects / Community Involvement

1. Support and establish community energy projects throughout lifetime of the County development plan. ([SD-C147-186, Aileen O'Dochartaigh, Not Here Not Anywhere](#))
2. Support should be provided for all community attempts to deliver Community Energy projects as well as County wide proposals. ([SD-C147-73, Eugene Barrett, Knocklyon Network](#))

## Flood Resilience

1. Submission suggests cognisance of Planning System and Flood Risk Management Guidelines (2009) and circulars to ensure key principles of Flood Risk Management and Sustainable Planning are adopted. ([SD-C147-41, Rachel Woodward, Office of Public Works](#))
2. The submission highlights that Flood Risk Management Plans are an objective of the RSES. The new Plan should have regard for proposed Flood Relief Schemes within SDCC, ensure adequate zoning and the OPW have included a specific objective to be included in the draft development plan. ([SD-C147-41, Rachel Woodward, Office of Public Works](#))

## National/Regional Context

1. Climate Change- Irish Water is focused on addressing the impacts of climate change, with the Water Services Policy Statement 2018-2025 and most recently the Climate Change Sectoral Adaptation Plan for Water Quality and Water Services Infrastructure 2019 ([SD-C147-57, Niamh McDonald, Irish Water](#))
2. Irish Water is available to assist South Dublin County Council in identifying suitable zoned lands from a water services perspective, as per Appendix 3 and NPO 72 of the National Planning Framework. ([SD-C147-57, Niamh McDonald, Irish Water](#))
3. Recommends that all elements of the County Climate Action Plan should be included and given priority in the new CDP. The next Climate Action Plan (2024-2029?) should be specified in this CDP to be even more ambitious than this current Climate Plan.

Calls for a priority to be placed on increasing the tree cover in the County and fostering of hedgerows. ([SD-C147-203, Betsy Omidvaran](#))

4. Irish Wind Energy Association (IWEA) Highlights the role that wind energy can play in SDCC's aspirations to become as low a carbon County as possible by increasing energy efficiency and unlocking renewable energy potential.

IWEA believes it is now necessary to provide for the spatial planning of wind energy and electricity transmission infrastructure on a regional basis, rather than at the Local Authority level as has been the case to-date. If a sufficient quantum of land to accommodate 15-20GW of new wind energy has to be identified to ensure 4.2GW is actually installed by 2030, this target should be divided out between the three Regional Assembly areas. Allocating a clear target of 6GW per region, requires the areas of least landscape sensitivity with the greatest landscape capacity to be



identified to ensure an average of 1.4GW of new wind energy can actually be delivered in each region by 2030, which is the only way of ensuring the 4.2GW overall national target is achieved. ([SD-C147-189, Denis Devane, IWEA LTD](#))

### **Public Transport - Bus**

1. Public transport is an inherently sustainable form of travel and a vital part of reducing our overall emission levels and creating a more climate resilient South Dublin County.

One full Dublin Bus has the capacity to take 80 cars off the road... which equates to 92% less gCO<sub>2</sub> per kilometre travelled. SDCC should:

- Introduce demand management measures, taking the form of Park and Ride facilities, Automatic Number Plate Recognition (ANPR) to help police bus lanes and a reduction in the number of available carparking spaces.
- As the technology develops, on street charging infrastructure around South Dublin County may be necessary to ensure that electric buses have the ability to travel along some longer routes.
- Focus on turning away from consistent prioritisation of road improvement for private modes towards investment in low emission public transport and active travel.
- Align housing and transport strategies to future proof all new housing development with the goal of creating a more climate resilient and liveable South Dublin County in mind. ([SD-C147-95, Dublin Bus, Dublin Bus](#))

### **Sustainable Development**

1. Sustainable Development Goals should be evident throughout the new Plan and they should be linked to the various goals within the plan. ([SD-C147-202, Cllr Alan Hayes](#))

### **Wind Energy**

1. Recommendation in relation to ENERGY (E) Policy 9 Wind Energy and associated provisions in the existing Plan. ([SD-C147-222, Keep Ireland Open, Keep Ireland Open](#))
2. Coillte requests that SDCC in the preparation of the CDP, with respect to renewable energy:
  - Include policies and objectives in the Plan that recognise, promote and facilitate on-shore wind and commit to ensuring the renewable energy potential of the county is maximised to achieve the most recent national targets.
  - Recognise and respond to the scale and urgency of climate change as part of the County Development Plan review process by preparing/updating a Renewable Energy Strategy for the County based on the new national targets and the principles of the SEAI LARES.

- Lead the EMRA region in developing a consistent approach to key RES issues including a consistent approach to identifying suitable lands and categorising landscape sensitivity. Ensure that wind speed, site specific engineering issues, and existing grid capacity issues are not considered constraints in identifying suitable lands, and ensure a sufficient quantum is identified to account for site level attrition.
- Reconsider the attachment of conditions of finite duration to wind farm permissions.
- Recognise the DHPLG Wind Energy Development Guidelines and any updates thereof, as the appropriate national standard rather than seeking to alter or replace the requirements therein.
- Work in partnership with other government agencies and third parties, including the public, to achieve these goals. ([SD-C147-53](#), [Aoife McCarthy](#), [Coillte](#))

## Population Growth and Housing

### Compact Growth

1. New developments should be located in close proximity to transport hubs with higher density development located in close proximity to existing infrastructure such as Luas/Rail. Mixed Use Development should be encouraged within urban centres maximising existing infrastructure and connections to retail and commercial zonings. ([SD-C147-2, Proinsias Fhlannchadha SD-C147-5, Conor Mulligan](#))
2. The LDA supports the position of and states that it is critical in delivering sustainable communities of the future that a plan led approach is promoted to the delivery of housing in particular locations served by good quality infrastructure. ([SD-C147-227, Alan Kelly, Land Development Agency](#))
3. The LDA is supportive of the approach to develop the main settlements within the County which include compact growth, brownfield regeneration and integration with public/sustainable transport options. ([SD-C147-227, Alan Kelly, Land Development Agency](#))
4. The LDA is supportive of the overall strategy to accommodate an additional 80,000 people to 32,000 homes by 2040 with aims to focus growth where high quality public transport already exist at Adamstown and Clonburris SDZs along with the regeneration lands of Tallaght and the Naas Road. ([SD-C147-227, Alan Kelly, Land Development Agency](#))
5. No new areas should be developed for housing without transport / schools infrastructure first and the focus should be to densify existing urban areas like industrial estates but do not put housing in active industrial areas. Therefore, allowing Green belts to remain as green zones for the health and wellbeing of SDCC citizens. ([SD-C147-100, Olive O'Malley](#))
6. New housing development should be linked to existing and planned public transport and the public transport network should have the capacity to support this growth, this is especially true of the SDZs at Adamstown and Clonburris. ([SD-C147-95, Dublin Bus, Dublin Bus](#))
7. Public transport, housing and employment strategies should be aligned to ensure there is adequate transport links between high-density employment areas and high-density housing areas. ([SD-C147-95, Dublin Bus, Dublin Bus](#))
8. In order to provide sustainable communities housing provision should be provided in tandem with services such as schools, childcare facilities, community centres. All new communities should have community centres of suitable size and seeks to remove community shared spaces in apartments going forward. The submission suggests the 15/20 min City Concepts should be considered, to increase densities but communities should be close to education/employment /public transport. ([SD-C147-198, Carly Bailey](#))
9. Requests that the South Dublin County Development Plan 2022-2028 actively promotes and encourages 'Consolidation Areas within the Gateway' as an appropriate location for further sustainable intensification and provide for additional residential units within the 'Consolidation Areas within the Gateway' i.e.

Palmerstown, Naas Road, Templeogue, Ballyroan, Ballyboden, Knocklyon, Firhouse, Ballycullen, Greenhills, Terenure and Rathfarnham. ([SD-C147-163, Wellsea Properties Ltd, Wellsea Properties Ltd](#))

10. From 2011 - 2019, Housing completions has occurred along the periphery of County Dublin, contrary to National and Regional Policies which seek consolidation within the Dublin Metropolitan area. How does the Development Plan address this development trend? ([SD-C147-63, Hibernia REIT, Hibernia REIT](#))
11. Are there opportunities to enhance development potential close to Park and Ride facilities to create sustainable neighbourhoods with a range of services to support the wider community? ([SD-C147-63, Hibernia REIT, Hibernia REIT](#))
12. Has South Dublin examined the quantum and location of open space (Objective OS) and agricultural land (Objective RU) within the built footprint of the County and in close proximity to existing and planning transport corridors to identify if they may be suitable for an alternative use that would assist in achieving sustainable compact growth? ([SD-C147-63, Hibernia REIT, Hibernia REIT](#))
13. Are there opportunities for infill and sprawl repair which can assist in improved land use management and greater biodiversity to the benefit of the wider amenity and ecological sustainability of the County? ([SD-C147-63, Hibernia REIT, Hibernia REIT](#))
14. The Chamber strongly supports a vision of sustainability, compact growth, urban density, and brownfield regeneration contained in the National Development Plan (NPF). Consistency with the vision and objectives in the National Planning Framework and Metropolitan Area Strategic Plan and supports planning policies to achieve compact growth, brownfield regeneration, and high-density development. ([SD-C147-156, Marian O'Donnell, Dublin Chamber](#))
15. Dublin Chamber request a focus on mixed-housing developments, increased population density and embracing the principle of compact growth and brownfield regeneration. ([SD-C147-156, Marian O'Donnell, Dublin Chamber](#))
16. The NTA requests that the Development Plan be guided by and include land use policies and objectives which support the consolidation of urban-generated development within existing urban areas, in complement with the integration of land use and transport planning:
  - the development of lands, within or contiguous with existing urban areas should be prioritised over development in less accessible locations;
  - To the extent practicable, residential development in urban areas should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport, including infill and brownfield sites, are prioritised;
  - Larger scale, trip intensive developments, such as offices and retail, should primarily be focused into central locations in urban areas; ([SD-C147-29, Mick Mac Aree, National Transport Authority](#))
17. Submission suggests that new communities should be designed with a Transport Orientated Development outlook or using the compact growth concept. ([SD-C147-96, Kieran Walsh, Public Participation Network](#))

18. Encourage acceleration of housing at appropriate densities throughout the county, with specific mention of the Ballycullen/Old Court Local Area Plan. ([SD-C147-214, David Kennedy](#))
19. Increase housing density close to major public transport hubs. Calls for more infill development. ([SD-C147-141, Ross O'Mullane](#))

### **Core Strategy**

1. Request the Draft Plan promote utilisation of available funding for plan led development and regeneration of key sites including publicly owned land to support the most efficient use of state lands. ([SD-C147-227, Alan Kelly, Land Development Agency](#))
2. Request that the key opportunity areas for regeneration are identified in the Draft Plan which specifies what urban regeneration projects the Council are committing to apply for or, the inclusion of criteria or framework to guide the selection of such additional project. ([SD-C147-227, Alan Kelly, Land Development Agency](#))
3. Request that projects within regeneration areas are listed for prioritisation with projects eligible for URDF funding clearly identified. ([SD-C147-227, Alan Kelly, Land Development Agency](#))
4. In preparing the draft County Development Plan, Coillte request that the Council ensure the zoning of sufficient lands/inclusion of appropriate policies with associated objectives for recreational, commercial, tourism and community uses. ([SD-C147-53, Aoife McCarthy, Coillte](#))
5. The submission calls for a survey and identification of vacant homes which could be used to meet housing needs. ([SD-C147-197, christine Barretto, South Dublin Environmental Network](#))
6. Development at higher densities and compact growth are important aspirations for any Development Plan. Given the impact of Covid-19 however, more flexibility should be afforded to the pattern of development of SDCCs towns and villages. A higher proportion of greenfield development may be required to allow for larger homes with home workspaces and access to larger private amenity space or countryside. ([SD-C147-75, Hugh Durkin Nigel Smith](#))
7. It is important that the South Dublin County Development Plan 2022-2028 policies, together with the Development Management Standards therein, ensure that the right land is zoned for the plan period (and headroom) given the growth in population that is projected. It is important that strategic policy and Development Management Standards protect both the public/consumer and housing providers by imparting appropriate flexibility while ensuring high standards throughout. ([SD-C147-159, Margo Grogan, Quintain Developments Ireland Limited](#))
8. Requests that consideration be given for appropriate objectives and policy interventions, together with relevant adjustment to development management standards in order to ensure and facilitate timely housing supply for South Dublin's growing population. ([SD-C147-159, Margo Grogan, Quintain Developments Ireland Limited](#))

9. Request that SDCC carefully re-calibrate the future Core Strategy to not only reflect the upper growth trajectory documented in the Implementation Roadmap for the National Planning Framework and facilitated through the Regional Spatial and Economic Strategy for the Eastern and Midland Region, but to consider the granularity also of these national exercises which use data at county level. Research carried out by FAC demonstrates how the Implementation Roadmap is too conservative in its population targets, and South Dublin is no different. ([SD-C147-159, Margo Grogan, Quintain Developments Ireland Limited](#))
10. Has South Dublin fully considered or assessed substantial landbanks within the urban footprint which can be brought into use as sustainable infill opportunities to meet housing demand close to existing and planned public transport and infrastructure? ([SD-C147-63, Hibernia REIT, Hibernia REIT](#))
11. How can the development plan deliver on the opportunities set out in the Strategic Corridors of the Dublin Metropolitan Area Strategic Plan under the Eastern Midlands Regional Spatial Economic Strategy? ([SD-C147-63, Hibernia REIT, Hibernia REIT](#))
12. What are the risks in future housing delivery for a six-year period being based on just a select number of larger sites which may or may not be delivered within the lifespan of the Plan? ([SD-C147-63, Hibernia REIT, Hibernia REIT](#))
13. How can the planning system ensure that there are housing sites that are ready to be activated and delivered to meet the demand in the short to medium term are part of the future Core Strategy? ([SD-C147-63, Hibernia REIT, Hibernia REIT](#))
14. Should a 'use it or lose it' Strategic Local Objective be included for the zoning of larger landbanks that have a significant role to play in housing delivery for the County? ([SD-C147-63, Hibernia REIT, Hibernia REIT](#))
15. Has South Dublin fully explored the expansion of infill development and mixed-use activity at transportation nodes and radiating out from high quality transportation corridors in all directions? ([SD-C147-63, Hibernia REIT, Hibernia REIT](#))
16. Has South Dublin identified gaps and underutilised areas within the urban form of the built environment which could be repaired by strategic infill developments, providing for connected communities, increased permeability and a range of uses? ([SD-C147-63, Hibernia REIT, Hibernia REIT](#))
17. Population Growth Carin Homes hope the latest population growth figures from the CSO are viewed, as the NPF and RSES are currently projecting figures are too low, which may lead to a shortage of appropriately zoned land to cater for demand, which will have an impact on the delivery of new homes in the County. ([SD-C147-64, Emma Flanagan, Cairn PLC](#))
18. Housing: Focusing on household size, as well as evidence of a low vacancy rate and population increases to be higher, SDCC should ensure there is sufficient provision of zoned land and supported appropriate policies. The issue of headroom is also mentioned, stating that there is need to maintain headroom level of 50% or greater in the zoning of housing lands within the County. ([SD-C147-64, Emma Flanagan, Cairn PLC](#))

19. National Planning Policy: Cairn Homes would encourage SDCC to engage with any further Section 28 Guidelines as well as ensure the new CDP is consistent with what is stated within the MASP of the EMRA/NPF. ([SD-C147-64, Emma Flanagan, Cairn PLC](#))
20. The submission provides a general background to the purpose of the Regional Spatial and Economic Strategy (RSES) and the requirement for the County Development Plan to be consistent with the RSES and the National Planning Framework (NPF) thus ensuring alignment between local, regional and national policy. The submission draws attention to key areas and Regional Policy Objectives (RPOs) of the RSES, and the National Strategic Objectives (NSOs) of the NPF which should inform the County Development Plan.

**Growth Strategy:** The submission draws the attention of the Council to the Growth Enablers for the Eastern and Midland Region, along with the Growth Enablers for Dublin City and Metropolitan Area and for the Dublin - Belfast Economic Corridor.

**Sustainable Compact Growth:** The submission draws the attention of the Council to RPO 3.2 which requires local authorities, in their Core Strategies to set out measures to achieve compact urban development targets of at least 50% of all new homes within or contiguous to the built up area of Dublin City and Suburbs and a target of at least 30% for other urban areas, in line with Project Ireland 2040 - the National Planning Framework (NPF).

The submission further sets out that RPO 3.3 also determines that regeneration lands are identified in Core Strategies and that specific objectives are set out to develop these lands. It is anticipated that further guidance on the delivery and monitoring of compact growth will be addressed in upcoming draft Departmental Guidelines for Development Plans.

**Settlement Strategy:** The Submission requests that the settlement strategy set out in the Draft Plan be in line with the RSES and Regional Policy Objective (RPO) 4.3 which relates to the settlement hierarchy.

Consideration should be given to the definition of settlements located outside the city and suburbs boundary, as lower tier settlements and distinct from those areas that are located within or contiguous to the existing built up area of 'Dublin city and suburbs'.

**Dublin Metropolitan Area Strategic Plan (MASP):** The submission makes reference to the regeneration of strategic lands at Naas Road/Ballymount in the City Centre within the M50, the consolidation and regeneration of the county town of Tallaght and delivery of the strategic residential and economic development areas on the South-West Corridor, supported by the LUAS and Kildare lines, as set out in Table 5.1.

The plan should ensure a phasing and prioritisation of enabling infrastructure is applied to ensure a steady supply of strategic development lands in the DMA. The core strategy of the CDP should have a focus on the delivery of sites in the MASP whilst retaining flexibility to provide for ongoing opportunities for increased densities, reduced vacancy and re-use of underutilised lands within the Metropolitan area in line with the transitional population projections methodology in the NPF.



National and Regional Population Targets: The submission states that population targets should be applied as set out in the NPF Implementation Roadmap and NPO 68 of the NPF.

The submission sets out that the Planning Authority must ensure that the County Development Plan (CDP) 2022-2028 is consistent in its entirety with the RSES the following are key areas that the Regional Assembly wish to draw attention to in the drafting of the Core Strategy of the CDP:

Vision: In determining the overall vision of the new South Dublin CDP, it is recommended that the Council consider the Vision, Key Principles and Regional Strategic Outcomes (RSOs) of the RSES Chapter. ([SD-C147-31, Pauline Riordan, EMRA](#))

21. The Assembly welcome the stated alignment that is required between policies of the NPF and the RSES with the Core Strategy of the CDP and the inclusion in the Issues Paper of population targets that align with the high range of RSES population projections to 2031.

The Assembly recommend that further phased breakdown of population targets should be applied in accordance with the MASP Transitional Population Projections, as adjusted to comply with NPO 68 of the NPF and with the methodology for transitional projections in the NPF Implementation Roadmap.

In drafting the Core Strategy the Council is required to set out an evidence based rationale for the provision of adequate zoned land and a tiered approach to zoning to meet the NPF/RSES population targets over the lifetime of the plan, and to accommodate future development beyond the plan.

The Assembly welcomes the recognition of the issues paper to the designated growth centres within the County and it is anticipated that the review of the Draft Plan will allow for consideration of targeted zoning objectives and active land management measures to drive the regeneration of designated lands at Tallaght and the Naas Road.

The Assembly welcomes the steps identified on the Issues paper in regard to the adequate delivery of Housing and the need to examine housing delivery and to prepared a land availability, capacity and infrastructural study in order to inform the Core Strategy, Housing Strategy and zoning Objectives.

It is recommended that the review of the CDP be informed by an evidence based Housing Needs Demand Assessment which will allow for the consideration of housing targets, types and tenures alongside the monitoring of housing delivery and supply in line with NPO37 of the NPF.

The assembly drawing the Council's attention to policies 9.3 of the RSES including RPO 9.5 in that EMRA will support local authorities in preparing a HNDA and it is considered that a sub-regional HNDA is appropriate for the Four Dublin Local Authorities. ([SD-C147-31, Pauline Riordan, EMRA](#))

22. While the assembly acknowledge the identified clusters of settlements within the identified neighbourhood areas provide a rational basis for spatial consultation



around strategic issues and opportunities, a key issue in the preparation of the Core Strategy will be to ensure consistency with the settlement hierarchy and settlement typologies set out in Table 4.2 and Table 4.3 of the RSES.

Neighbourhood Areas - The submission recommends that consideration to be given to the phasing and prioritisation of development lands, and that all future land subject to zoning shall undergo an infrastructure and deliverability assessment in line with NPF NPOs 72 (a), (b) and (c), which sets out a tiered approach for zoning lands. Also, of relevance are RSES RPO 4.2 to promote collaboration with infrastructure providers to ensure alignment of enabling infrastructure investment.

[\(SD-C147-31, Pauline Riordan, EMRA\)](#)

23. The submission refers to the provisions of the NPF and the RSES with specific reference to the MASP and Growth enablers and guiding principles for the growth of the Dublin Metropolitan Area. In respect of compact growth, the RSES makes a distinction between the targets for the built up area of the city and other areas which is of relevance to South Dublin.

To achieve ambitious compact development targets of at least 50% of all new homes within or contiguous to the existing built up area in Dublin and 30% in other settlements, the MASP identifies strategic residential, employment and regeneration development opportunities on the corridors along with the requisite infrastructure investment needed to ensure a steady supply of sites in tandem with the delivery of key public transport projects. [\(SD-C147-144, Maude Ni Bhrolchain, Office of the Planning Regulator\)](#)

In this regard, the Core Strategy and Settlement Strategy will need to provide clarity on the anticipated delivery of housing and employment on greenfield and brownfield sites within the city's footprint and within individual settlements in the rural hinterland.

The office refers to Local Area Plans at Fortunestown and Ballycullen-Oldcourt which have expired and recommends that the content of such plans be transpose into the new plan in so far as possible and to ensure that there is transparency the Core Strategy regarding the remaining development yields from the expired LAPs.

The office highlights the requirement for the population targets for the County to be consistent with the RSES and the MASP and in this regard advises that a significant proportion of the County's future population growth be directed to

1. Naas Road / Ballymount Strategic Development Area, which has potential for residential development and more intensive employment / mixed use
2. South western corridor (western suburbs) SDZ lands and Kilcarbery
3. South western corridor (LUAS red line) Tallaght Town Centre / Cookstown and Fortunestown / Saggart / Citywest.

The OPR advises the planning authority to prepare a HNDA which responds to the specific socio- economic trends identified at the neighbourhood level and is consistent with National Policy Objective (NPO) 37 of the NPF and any guidance on HNDA issued by the Department of Housing, Planning and Local Government.

With specific reference to the future development of the Naas Road Corridor the Office draws the attention of the planning authority to section 9(4) of the Act in

regard to the coordination of the objectives for both lands within South Dublin and Dublin City. ([SD-C147-144, Maude Ni Bhrolchain, Office of the Planning Regulator](#))

24. National and regional objectives for population growth, compact growth and regeneration in determining the Core Strategy, including the settlement hierarchy for your functional area. In this regard, the OPR advises that a significant proportion of the County's future population growth should be directed to the Naas / Ballymount Strategic Development Area and South west Corridor (western suburbs and LUAS Red Line).

Compact Growth: The inclusion of specific policies and implementation measures that encourage infill / brownfield development in the County's designated strategic development areas. These policies and implementation measures should be specific, targeted, and measurable (i.e. include monitoring measures).

Naas Road: The potential to re-intensify older industrial estates such as Naas Road/Ballymount, brownfield lands in Tallaght/Cookstown and to provide for high tech and research and development employment at Grangecastle which are identified as strategic employment locations in the RSES. A coordinated and joint approach with Dublin City Council will be required in respect of the redevelopment of the Naas Road corridor to ensure an appropriate balance between residential development, the re-intensification of employment lands and mixed uses.

The inclusion of specific policies and implementation measures that encourage infill / brownfield development in the County's designated strategic development areas. These policies and implementation measures should be specific, targeted, and measurable (i.e. include monitoring measures).

The promotion of renewable energy sources within the county in accordance with the relevant section 28 guidelines. ([SD-C147-144, Maude Ni Bhrolchain, Office of the Planning Regulator](#))

25. Request the Draft Plan prioritises the development of capacity sites identified under the current Development Plan. ([SD-C147-224, Cunnane Stratton Reynolds, Cunnane Stratton Reynolds](#))

26. Requests that SDCC avoid site specific restrictions for individual sites such as the restriction of residential sites to retirement living for sites that have perceived vehicular access constraints, particularly where alternative forms of public transport are available.

Given the mature nature of consolidation areas, available sites for development should prioritise the densification and provision of diverse housing types which are lacking in the local area. ([SD-C147-224, Cunnane Stratton Reynolds, Cunnane Stratton Reynolds](#))

## **Housing Delivery/Tenure**

1. Construct homes as quickly and as cheap as possible. ([SD-C147-18, jos fullam](#))

2. Concerns are raised to ban co-living housing and ensure that SDCC do not sell public land to private developers for profit. ([SD-C147-197, christine Barretto, South Dublin Environmental Network](#))
3. Concerns that SDCC is prioritising the national objective for compact growth without considering the impact of strategic housing developments on village centres such as Palmerstown village. ([SD-C147-78, Riversdale, Riverview, Old Lucan Road Resident's Group, RROLR Resident's Group](#))
4. The submission suggests, adequate social housing for larger families and 1-bed units are required and that accommodation needs for older people and those with intellectual disabilities should be provided in all areas so social links can be maintained and ensure Traveller accommodation grants are used. ([SD-C147-198, Carly Bailey](#))
5. Current Build-to-Let housing policy must be discouraged, and Co-living housing policy should be rejected. These policies do not promote sustainable communities. The submission welcomes the phasing out of the SHD policy. Some of these high-density sites were inconsistent with existing CDP and LAP policies and seek that if such sites are to be amended or extended that SDCC ensure that these developments are improved if possible. ([SD-C147-198, Carly Bailey](#))
6. Ensure all housing provides space for home-working and also community hubs and hot-desk spaces. ([SD-C147-198, Carly Bailey](#))
7. The plan should promote a rapid retrofit programme for all Council housing stock. The plan should promote the development of sufficient high quality and energy efficient public housing. ([SD-C147-56, Paul Murphy](#))
8. Provide older population alternative housing options within their existing communities to downsize and thus free up larger family homes. ([SD-C147-87, Deirdre tierney](#))
9. Submission raises concerns that SDCC does not 'defend' its own Development Plan, that SHD's are bypassing the local planning system and are being granted contrary to our Development Plan policies. Considers that SDCC Development Plan, which is made for and with the people of South Dublin County should trump national planning policies. ([SD-C147-202, Cllr Alan Hayes](#))
10. Will the Draft Plan recognise the clear undersupply of apartment developments which have clear sustainability benefits to this type of typology in the County and identify sites that are capable of delivering higher density housing typologies? ([SD-C147-63, Hibernia REIT, Hibernia REIT](#))
11. There are a number of Electoral Divisions and neighbourhoods within the built-up area of South Dublin County Council which have seen very little growth in housing supply and are dominated by housing, typically of the semi-detached typology. ([SD-C147-63, Hibernia REIT, Hibernia REIT](#))
12. Has South Dublin considered how to increase tenure choice in such areas to allow people to stay in their local communities as their housing needs change? ([SD-C147-63, Hibernia REIT, Hibernia REIT](#))

13. Local level planning policy needs to ensure that demand for housing, which is significantly higher than supply is addressed to enable homeownership as a housing choice. The supply must include a greater diversity of housing stock beyond the average family home by increasing the quantum of 1-2 bed units within a wider range of building types is clearly required in order to cater to the changing needs of the community. ([SD-C147-63, Hibernia REIT, Hibernia REIT](#))
14. The increase in Household occupancy rates and of family sizes within South Dublin illustrates issues of congestion, multi-generational living and lack of mobility in the housing stock. ([SD-C147-63, Hibernia REIT, Hibernia REIT](#))
15. Through a range of measures a diverse mix of unit types can be included in new developments and regeneration which can provide for greater densities and compact growth. Such diversity of tenure is more conducive to supporting new and existing communities and can provide for down-sizing and 'right-sizing' within one's own community ([SD-C147-63, Hibernia REIT, Hibernia REIT](#))
16. The longer individuals are relegated to renting in a market with an insufficient supply of tenure choices the harder it will become for them to establish households and stronger community connections which could lead to damage economic growth and lead to further disparities of supply and affordability in existing communities. ([SD-C147-63, Hibernia REIT, Hibernia REIT](#))
17. SDCC should partner with developers to provide suitable housing for older people where there is a huge number of houses within South Dublin which are 3,4,5 beds but only occupied by a single person or couples as they mainly see no alternative accommodation being provided unless it is to go into an apartment. ([SD-C147-73, Eugene Barrett, Knocklyon Network](#))
18. Population Growth & Housing - A Growing Population meeting its needs  
The challenge in the County is to address allocating housing provision, schools , public transport and amenities for a growing population. The SD Chamber would like to see a wide variety of Housing types and easy access to Green public spaces within the County. ([SD-C147-61, Peter Byrne, South Dublin Chamber](#))
19. Request an SLO that all Council built homes and those SDCC support through the Voluntary Housing Sector have adequate floor space and design to support effective home working space and infrastructure - ventilation, natural light, power connections, etc. ([SD-C147-200, Gerard Stockil, Tallaght Community Council](#))
20. Tallaght needs a housing strategy that attracts families and homeowners to choose Tallaght as their home. ([SD-C147-200, Gerard Stockil, Tallaght Community Council](#))
21. Submission suggests that smaller houses for the elderly are incorporated into their building projects, so people can downsize within their communities.  
Lands are currently available in Whitehall Road, Terenure which could accommodate such a development.  
([SD-C147-96, Kieran Walsh, Public Participation Network](#) )
22. In the context of COVID-19, Universal Design Homes could have adaptable home offices or work stations designed in from the start that could be adapted for other

uses once the pandemic threat of Covid-19 recedes. ([SD-C147-174, Edward Crean, National Disability Authority](#))

23. To recognise that while UD homes have a higher upfront cost, this can negate a portion of any future long-term retrofit costs with potential to incorporate as part of Energy retrofitting funding UD approaches are incorporated. ([SD-C147-174, Edward Crean, National Disability Authority](#))
24. Request that SDCC review the 10 Ways to Construct a More Lifetime Adaptable and Age Friendly Home guidelines developed in collaboration with Fingal County Council, Age Friendly Ireland and the NDA's Centre for Excellence in Universal Design (CEUD). ([SD-C147-174, Edward Crean, National Disability Authority](#))
25. Request that the Wexford County Development 2013 - 2019 is reviewed as it promotes Universal Design and Lifetime Housing in accordance with best practice requiring:
  - application for large scale development, to prepare an Access Statement in accordance with Appendix 6 of Booklet 9 'Planning and policy' from the NDA's Buildings for Everyone: A Universal Design Approach.
  - An objective to ensure that a minimum of 20% of dwellings in all new housing estates of five dwellings or more are suitable to accommodate or are adaptable to provide accommodation for people with disabilities.
  - Developments which do not confirm with Part M should be taking in charge.
  - UD forms part of the pre-planning to ensure the 20% minimum is achieved. ([SD-C147-174, Edward Crean, National Disability Authority](#))
26. Draft Plan to consider the aspects of the core features of a Universal Design Home relating to fixtures, fittings, bathrooms and general inner workings of a household with internal structural support to facilitate future extensions at ground level with typical house types set out in an appendix to the submission. ([SD-C147-174, Edward Crean, National Disability Authority](#))
27. To reiterate the Programme for Government which commits to ensuring that an appropriate mix of housing design types is provided, including universally designed units, accommodation for older people and people with disabilities. ([SD-C147-174, Edward Crean, National Disability Authority](#))
28. For SDCC to recognise that our population is living longer, the number of older persons is growing and people with disabilities is increasing with particular implications for housing and supported living in the community, and the need to ensure a sustainable Universal Design is incorporated into the housing model for Ireland's future. ([SD-C147-174, Edward Crean, National Disability Authority](#))
29. SDCC to recognise that National Disability Authority, in partnership with housing industry introduced measures to ensure that over a five year period deliver of units include that 30% of all new dwellings are built to incorporate Universal Design principles to accommodate our ageing population ([SD-C147-174, Edward Crean, National Disability Authority](#))

30. Housing which follow the Universal Design approach have long-term benefits in the form of savings to the State in health and social care, help alleviate the challenges presented by climate change, and improve the well-being and fabric of communities that are appearing to become more disjointed and individualised. ([SD-C147-174, Edward Crean, National Disability Authority](#))
31. Submission raises concerns that homelessness is an issue, SDCYPSC need to build on its work to respond to needs of homeless families, children and young people, support those living in emergency accommodation, improving existing facilities in 'hubs' and providing supports to navigate the housing system. ([SD-C147-150, Joe RYNN, South Dublin Children Young People Services Committee](#))
32. Submission raises concern that 52,946 people in South Dublin County reside in areas categorised as 'very disadvantaged' or 'disadvantaged'. CYPSC members will need to work jointly to provide adequate responses to emerging issues within such areas, take account of current needs but also future needs of these communities. ([SD-C147-150, Joe RYNN, South Dublin Children Young People Services Committee](#))
33. The submission suggests that new housing developments require a true mix of tenures. Developer contributions to social housing stock should be true reflection of the development scheme, not the least desirable houses or cheapest. Encourage commitments for cost rental and affordable housing. ([SD-C147-106, Liam Sinclair, Green Party Tallaght](#))
34. A housing provision shift for older people is required. Provision of housing options within their existing communities with own door access, which promotes community care concept rather than residential care is welcomed. ([SD-C147-106, Liam Sinclair, Green Party Tallaght](#))
35. Submission raises concerns that co-living is contrary to health and well-being and should not be a housing option. ([SD-C147-106, Liam Sinclair, Green Party Tallaght](#))
36. This submission is in agreement with the issue paper on the area of green application's and the use of heat energy from data centres in neighbouring areas. It also notices emphasis on housing developments near transport corridor ,which at present is not happening enough, using Rathfarnham as an example. ([SD-C147-215, An Taisce South County Dublin Local Association, An Taisce, South County Dublin Local Association](#))
37. Ensure that residential development have a mix of 1-bed to 4-bed units. In apartment developments, common rooms, laundry rooms, storage and covered play areas should be provided. Calls for SDCC to remove the threshold for access to Social Housing so that it is accessible to all. ([SD-C147-190, Eoin Ó Broin](#))
38. Built Environment and Placemaking - The Council's attention is brought to RPO 9.1, which supports the provision of a mix of housing typologies to meet diverse future needs and to RPO 9.3, which supports a greater mix of housing type and tenure, including social and affordable.  
  
RPOs 5.4 and 5.5 support the provision of higher residential densities, achieving qualitative standards and the right housing and tenure mix in the metropolitan area, in line with national guidelines on 'Sustainable Residential Development in Urban

Areas', 'Sustainable Urban Housing; Design Standards for New Apartments' and 'Urban Development and Building Heights Guidelines for Planning Authorities' ([SD-C147-31, Pauline Riordan, EMRA](#))

39. Housing: Allow for development of smaller units throughout the County, to allow for the older population of the County to downsize. ([SD-C147-171, Pauline Foster, Recorders Residents Association](#))

## **Rural Housing**

1. Due to an aging farming population, a decline in farming activity can have a serious negative impact on the ecology and nature of the mountain areas. In the new plan the council should encourage the next generation of local farmers to be considered and catered for by allowing those who will continue the traditions and hill farming to be allowed to be housed beside or within the land. ([SD-C147-51, Paula Lee](#))
2. It is considered that the existing rural housing policy within the 2016-2022 is unjust and runs against the grain of the Irish Constitution. It is contended that a person who can demonstrate a long term ownership of land in area and a personal commitment to the community should be considered favourably for planning permission in such areas. ([SD-C147-7, Joe Cully](#))
3. Request the new Written Statement of the Development Plan, includes the following:
  - Map showing areas within the county under strong urban influence, strong rural areas, structurally weaker rural areas, and areas with clustered settlement patterns.
  - Maps showing areas for Settlement Expansion to Villages and Settlements.
  - Close family ties should be specified, i.e. uncle/aunt/cousin etc.
  - Applicants to be allowed to build a rural house should include:
    - persons who have lived in a rural area for substantial part of their lives and now want to remain close to the family home,
    - persons who have left the area and now wish to return to reside near to or to care for immediate family members.
    - persons who want to establish a new full-time rural business or activity.
    - persons who resides in a neighbouring county.

The new Written Statement of the Development Plan should include Maps highlighting areas with potentially effect on Natura 2000 Sites and or Natural Heritage Areas by so that applications outside the possible affective areas do not require the submission of screening reports. ([SD-C147-67, James McInerney, James McInerney Planning Consultant](#))

4. Request the Planning Authority considers the dynamics of rural farming and thus housing requirements which incorporate living and agricultural business activity (Storage spaces for tools, Office work, Changing and Washing Facilities, modes of Transportation, and set-down space) which their existing/new suburban house does not offer, and in particular a genuine need to reside on the landholding. The



outcome of this should inform the new Written Statement of the Development Plan. ([SD-C147-67, James McNerney, James McNerney Planning Consultant](#))

5. Request the new Written Statement of the Development Plan incorporates National and Regional policies which encourages rural generated housing and opposes urban generated housing and to ensure the policy wording is clear whereby it is clear to applicants that their applications would be refused. ([SD-C147-67, James McNerney, James McNerney Planning Consultant](#))
6. The Office acknowledges that a significant part of the county is predominantly rural and that these rural areas present different issues and opportunities in terms of supporting viable businesses, protecting rural amenity values and managing pressure for further rural one-off housing.

In regard to Rural Housing the Office advises that the plans policies will need to demonstrate consistency with NPO19 and NPO 20 and consider the practical implementation of appropriate policy objectives through suitable land activation approaches and proactive facilitation of the building of homes within the footprint of rural settlements through measures such as site acquisition and serviced sites consistent with NPO 18a and NPO 18b. ([SD-C147-144, Maude Ni Bhrolchain, Office of the Planning Regulator](#))



## Sustainable Movement

### Sustainable Movement - Overarching

1. Request that consideration to development within inner approach areas and public safety zones be given within the Development Plan review. Such development should be subject to an aviation safety assessment to ensure such development is appropriate. Facilitating such development would assist in delivering on a number of objectives to provide for compact sustainable urban growth within existing built up areas by providing for appropriate development within such zones. (Examples of world cases and examples submitted). Requests that consideration be given as to the maximisation of land within urban areas including lands with constraints such as Inner Approach Area and public safety zone designations. A broad variety of employment should be provided, including expansion of existing commercial businesses to ensure their long-term viability, or new employment uses adjacent to existing ones. ([SD-C147-135, Andrew Boland, NVD Limited](#))

### Active Travel

1. There is no mention of the recent developments of rebuilding the Silver bridge which has been awarded funding from Fingal CoCo of 1.6 million to protect a listed structure. Is there an opportunity for SDCC to collaborate with Fingal CoCo and the OPW to request funding to develop this walking and cycling link across the liffey? The opening up links to Waterstown Park via the Silver bridge is a great opportunity of local residents and tourists alike. ([SD-C147-44, Paul Corcoran, Rebuild the Silver Bridge](#) )
2. The plan should promote the development of safe places for people to walk and cycle, with investment in separated cycle tracks wherever possible. ([SD-C147-56, Paul Murphy](#))
3. The Chamber request that the CDP incorporate pedestrian-first planning to enhance the permeability of the public spaces, creating a walkable county that supports inclusive, vibrant and healthy communities. ([SD-C147-156, Marian O'Donnell, Dublin Chamber](#))
4. High quality segregated cycling infrastructure, including bike parking is a necessity. Development of an Active Travel Plan to ensure modal shift, recommendations for such plan were set out. Increase permeability throughout the county for pedestrians and cyclists. ([SD-C147-94, Elizabeth Hickey](#))
5. This submission deals with sustainable mobility, raising the point of reallocation of road space across the county (Knocklyon Road/Scholarstown road map is submitted to outline a scheme in favour of active travel). The submission asks for dedicated cycle lanes, maintenance of bus service as well as a Traffic Management Plan for the Knocklyon area. ([SD-C147-101, brian sherry](#))
6. The submission suggests that active travel must be prioritise, protected, and promoted. Road network space should be reallocated to active travel, adopt an active travel first approach to planning, improve active travel infrastructure and

associated bike parking, run 'back in the saddle' courses. ([SD-C147-106, Liam Sinclair, Green Party Tallaght](#))

7. Recommendation in relation to Transport and Mobility (TM) Policy 3 Walking and Cycling and associated provisions in the existing Plan. ([SD-C147-222, Keep Ireland Open, Keep Ireland Open](#))

## Airports

1. This submission deals with the DAA submission. Regarding Obstacle Limitation Surface (OLS) they have asked that any proposals which exceed 90m above ground level are referred to the DAA which lies within the 15km safety zone. They have also recommended any development proposals at Weston Airport with potential impact on the safe operation of Dublin Airport are referred to the DAA and the IAA for comment.

Also, in relation to the area of Glint and Glare, it is recommended that SDCC refer any proposals for solar farms within 15km of Dublin Airport to the IAA and DAA. ([SD-C147-121, Louise Byrne, daa](#))

## Car Parking

1. Calls for electrical car charging points to be provided in Part 8 residential developments in South Dublin and for SDCC to show leadership on this issue. Where planning permission is sought for car park spaces they should always include electrical charge points for each car park space provided to future proof sustainable development. ([SD-C147-25, Thomas Gallagher](#))
2. New housing developments do not need enough car parking spaces to provide each household with the capacity to park a car. ([SD-C147-95, Dublin Bus, Dublin Bus](#))
3. Increase number of electric vehicle parking bays, more disable parking bays and bays designated for hired cars, which will reduce car dependency. ([SD-C147-198, Carly Bailey](#))
4. Dublin Chamber request that car parking policies should reflect this expanding public transport and sustainable mobility network, while supporting modal shift. The level of car parking space within South Dublin should be gradually reduced on a phased basis to reflect modal shift to public transport and active travel. Car parking should also be future proofed to accommodate electric vehicles. Other parking spaces should be considered for conversion to accommodate active travel options, by including bike parking, e-scooter sharing schemes, or new pedestrian spaces as appropriate. ([SD-C147-156, Marian O'Donnell, Dublin Chamber](#))
5. All non-residential development proposals should be subject to maximum parking standards; In locations where the highest intensity of development occurs, an approach that caps car parking on an area-wide basis should be applied - of particular relevance to the larger urban areas; and ([SD-C147-29, Mick Mac Aree, National Transport Authority](#))
6. The NTA recommends that car parking provision for non-residential developments should be subject to maximum standards. In addition, in locations where the highest

intensity of development occurs, an approach that caps car parking on an area-wide basis should be applied. ([SD-C147-29, Mick Mac Aree, National Transport Authority](#))

7. Submission recommends expansion of PV solar to all new public buildings, plan for increase in electric vehicles, improve and expand public charging infrastructure and charging points at new homes and businesses. ([SD-C147-106, Liam Sinclair, Green Party Tallaght](#))
8. Calls for free parking across SDCC. ([SD-C147-141, Ross O'Mullane](#))
9. Promoting, encouraging and facilitating the use of sustainable modes and patterns of transport including electric vehicles, including Parking Standards that will set minimum levels of parking provision for EVs. ([SD-C147-185, Colm Cummins, Electricity Supply Board](#))

## Cycling

1. Asks if there are plans to develop a cycle route to the Backweston agricultural labs in conjunction with Kildare County Council, as it is difficult to cycle from Lucan/Palmerstown to Backweston. ([SD-C147-44, Paul Corcoran, Rebuild the Silver Bridge](#))
2. Newcastle needs safe cycle and walking lanes. A Greenway link to Rathcoole and to Hazelhatch and the Canal would be hugely beneficial ([SD-C147-54, Fergal Britton, ReNewcastle Community Group](#))
3. Existing cycling infrastructure is dangerously lacking. ([SD-C147-18, jos fullam](#))
4. Submission calls for more segregated cycling lanes in South Dublin and continuity of provision along routes.

Cycle lane on the Naas Road heading from the Red Cow towards the city centre is segregated for circa 200m and then ends at a left turn slip road at Woodies which is a dangerous point to enter traffic.

Submission highlights the need for an improved network of cycle lanes in South Dublin. Many of the existing cycle lanes are not maintained and have become unfit for purpose. 4

The existing segregated cycle/pedestrian bridge from the Ballymount Industrial Estate that crosses the N7 needs serious improvement as markings have faded and there is insufficient signage.

There is a need for cycle lanes within Ballymount Industrial Estate. ([SD-C147-24, Niamh Stephens](#))

5. A need for more dedicated cycle infrastructure especially along main roads throughout the County. ([SD-C147-100, Olive O'Malley](#))
6. Concerns about the quantum and quality of cycle lanes in the county and the safety of cyclists at junctions. Highlights the need for better end-of-trip facilities for cyclists such as safe, dry cycle parking and showers and lockers. ([SD-C147-27, Aoife Harrington](#))

7. Safe, segregated and joined up cycling routes are required in the County in order to encourage a more sustainable pattern of transport within the County. ([SD-C147-9, Colin Boyle](#))
8. Highlights the lack of progress made by SDCC to complete the Grand Canal Greenway from Grange Castle to Hazelhatch and encourages SDCC to prioritise this in the next county development plan. ([SD-C147-28, Shane O'Brien](#))
9. Seeks the provision of good cycle lanes and covered storage places for bikes in line with what is available on the continent. ([SD-C147-82, Declan Hanley](#))
10. Cycling infrastructure should be improved across the county, support segregated cycle lanes, provide grants for businesses to install safe secure bike parking. Permeability through all estates is required to promote active travel. ([SD-C147-198, Carly Bailey](#))
11. Cycling provides the best return on investment of all transport modes, therefore the enhancement of cycling infrastructure should form an important element of the plan. Plan for a network of safe, segregated cycle lanes and the plan should put in place a comprehensive network of safe, segregated, well lit and integrated cycle infrastructure supported by secure parking and services. New cycling routes and retrofitting of existing residential, commercial and retail environments are needed. This will support Climate action as transport accounts for 20% of Ireland's overall emissions with 52% of overall transport emissions coming from private cars.  
  
Many of the cycling initiatives listed in the existing plan have not been completed. It is essential that funding to develop a safe, segregated cycling network is ring-fenced, if the plan is to be realistic and achievable. A list of key cycle routes that will be completed in the timeframe of the plan  
  
Creating more liveable urban areas through investing in cycling will help to achieve 'Compact Growth', a key objective of the National Development Plan. High standards are required for bicycle movements in and around high-density developments to local village centres and along commuting routes to Tallaght, Sandyford and Dublin City Centre. Secure bicycle parking must be provided as a planning condition in such developments. Reallocation of some existing road space to cycling, e.g. by making some roads one-way and dedicating one lane to cycling. Intermodal connections between cycling and public transport with cycle connections / pedestrian routes to Luas and adequate safe bike parking at Luas / bus connectors (especially hubs with Bus Connects).  
  
The council should produce a mobility plan for the county that prioritises active travel and public transport. This should include a network of safe, segregated cycle routes that are suitable for people of all ages (8 to 80+). Interconnectivity on cycle routes to other Local Authority infrastructure (SDCC to Fingal, DCC and DLR). Emphasis on safe cycling routes to Schools, Community buildings / sporting venues, shops and large areas of employment e.g. Citywest and Grange Castle. ([SD-C147-35, Muireann O'Dea O'Dea, Dublin Cycling Campaign](#))
12. Cycling and walking are low impact ways of engaging with the natural heritage. ([SD-C147-35, Muireann O'Dea O'Dea, Dublin Cycling Campaign](#))

13. The present cycling infrastructure within the county is poor. There needs to be a planning effort focusing on ROUTES for example cycling from Clondalkin village towards Dublin city centre and Red Cow to make them accessible and safe. Cycle lanes need to be kept free from parked cars, debris and resurfaced as required. Many existing ones are in a bad state.  
([SD-C147-113, John Stephens](#))
14. Submission expresses the requirement for safe cycle infrastructure. The NTA's Greater Dublin Cycle Network Plan should be progressed further and faster under this new Plan. SDCC should comment on all proposed developments that access/egress along the proposed routes. ([SD-C147-202, Cllr Alan Hayes](#))
15. Dublin Chamber request the acceleration of investment in and delivery of the Greater Dublin Area Cycle Network Plan. ([SD-C147-156, Marian O'Donnell, Dublin Chamber](#))
16. Cycle paths are needed in order to promote safe cycling to ease traffic congestion  
([SD-C147-176, Lynn Tierney, Saggart Village Residents' Association](#))
17. This submission relates to cycling infrastructure within the county, highlighting the lack of temporary cycle infrastructure and lanes which were created in areas like DCC and DLR but have yet to be created within SDCC. ([SD-C147-119, John Lahart](#))
18. Submission would welcome the provision of cycling training through 'Cycle Right' due to the increased numbers using this mode of transport. ([SD-C147-96, Kieran Walsh, Public Participation Network](#))
19. The cordoned off approach to cycle lanes and the need to be smooth and maintained regularly. Every junction needs to be considered in terms of pedestrian, bike user, then motorised vehicles. Safe cycle parking at transport terminals.  
Install footrests at traffic lights for cyclists An app to report potholes. Calls for more biking and walking infrastructure across the Dublin Mountains.  
([SD-C147-141, Ross O'Mullane](#))

## General

1. To encourage people out of their cars into pedestrian, cycling and public transport there needs to be an ambitious strategy which looks at making these sustainable modes desirable which is cognisant of place-making with the required infrastructure in place. ([SD-C147-18, jos fullam](#))
2. The benefits of good quality transport infrastructure go beyond climate change goals and can be felt in the realms' of the local economy and on a community level. ([SD-C147-18, jos fullam](#))
3. In order to encourage modal shift from car to active travel, public transport and Personal Powered Transports, such as e-scooters, the convenience of the private car must be challenged, to do this:
  - invest in road space for sustainable modes.
  - Facilitate innovations such as Account Based Ticketing (ABT) and Mobility-as-a-Service (MaaS) and other intelligent transport innovative solutions.
 ([SD-C147-95, Dublin Bus, Dublin Bus](#))

4. Covid-19 has demonstrated the ongoing importance of private modes of transport. Great improvements in public transport have been achieved in SDCC and the Greater Dublin Area in the past 15 years. The new Development Plan must strike a balance between public transport provision and the ongoing need to cater for private modes of transport. ([SD-C147-74, Hugh Durkin](#))
5. GNI suggests that the Sustainable Movement section of the new South Dublin Development Plan includes wording to support CNG infrastructure. This would be in line with the 'Eastern and Midland Regional Assembly Regional Spatial and Economic Strategy 2019-2031 (EMRA RSES) which supports the 'use of alternative cleaner fuels for home heating and transport including the use of Compressed Natural Gas powered commercial vehicles'. ([SD-C147-108, Fiona O'Connor, Gas Networks Ireland](#))
6. The submission gives suggestions such as the provision of cycling and walking routes from new development connecting to places of employment, education etc., reduce car reliance, promote car-sharing, create attractive environments for people to increase user potential, and provision of adequate active travel infrastructure. ([SD-C147-94, Elizabeth Hickey](#))
7. Suggests that to meet carbon targets for sustainable transport, that cycling is the quickest way to implement a modal shift but requires high quality segregated infrastructure. ([SD-C147-94, Elizabeth Hickey](#))
8. The NTA Recommend: Planning at the local level should promote walking, cycling and public transport by maximising the number of people living within walking and cycling distance of their neighbourhood or district centres, public transport services and other services at the local level such as schools;  
  
New development areas should be fully permeable for walking and cycling and the retrospective implementation of walking and cycling facilities should be undertaken where practicable in existing neighbourhoods, in order to give a competitive advantage to these modes for local trip making;  
  
The density and location of employment development should maximise the potential for the use of walking, cycling and public transport;  
  
Where possible, new residential developments should provide for filtered permeability, i.e. provide for walking, cycling, public transport and private vehicle access while restricting or discouraging private car through trips;  
  
Trip destinations (employment sites, schools, retail, etc.) should be developed at locations that can maximise the potential to access such developments by walking, cycling or on public transport; ([SD-C147-29, Mick Mac Aree, National Transport Authority](#))
9. For all major employment developments and all schools, travel plans should be conditioned as part of planning permissions and be carried out in a manner consistent with existing NTA guidance. ([SD-C147-29, Mick Mac Aree, National Transport Authority](#))
10. The NTA recommends that the 'Sustainable Movement' Section of the Issues paper (page 36) be revised as part of the Draft Development Plan and informed by more

recent national and regional plans. ([SD-C147-29, Mick Mac Aree, National Transport Authority](#))

11. In December 2019 the NTA published its Implementation Plan 2019-2024, which sets out a range of transport projects that will be delivered or commenced during the life of the Plan. (Projects are listed as part of the submission and requested to be considered in the preparation of the Draft Development Plan - these include Bus Investment, Light and Heavy Rail Investment Projects and Integration Measures and Sustainable Transport Investment).

The next Government Capital Investment Programme and Greater Dublin Area Transport Strategy will also frame investment in the County over the period of the Development Plan. Certainty as to the content of these documents is not likely to emerge until 2022. ([SD-C147-29, Mick Mac Aree, National Transport Authority](#))

12. The NTA recommends that the Development Plan acknowledges the role rural transport services can perform in providing for social and economic connectivity between small villages/rural areas and larger towns within the County. The NTA provides rural transport services through the Local Link Rural Transport Programme. The NTA will develop and expand the Local Link Rural Transport Programme in the following manner:

- seek further integration with other public transport services, including HSE and school transport;
- ensure fully accessible vehicles operate on all services;
- enhance the customer experience;
- increase patronage among children and young people; and
- encourage innovation in the service. ([SD-C147-29, Mick Mac Aree, National Transport Authority](#))

13. The NTA recommends that the preparation of the Development Plan is informed by the following NTA guidance:

- The National Cycle Manual;
- Permeability Best Practice Guide;
- Achieving Effective Workplace Travel Plans: Guidance for Local Authorities;
- Workplace Travel Plans: A Guide for Implementers;
- Toolkit for School Travel; and
- Guidance Note on Area Based Transport Assessment (NTA and TII). ([SD-C147-29, Mick Mac Aree, National Transport Authority](#))

14. It is recommended that, where a requirement is identified to produce a Local Transport Plan for an area within the County, this process should be guided by the NTA/TII document Area Based Transport Assessment.

<https://www.nationaltransport.ie/strategic-planning/guidance-documents/> ([SD-C147-29, Mick Mac Aree, National Transport Authority](#))

15. It is recommended that the Development Plan includes sustainable transport indicators, including mode share, for the purpose of monitoring the efficacy of policies and development objectives against a range of sustainable development indicators. ([SD-C147-29, Mick Mac Aree, National Transport Authority](#))



16. Move away from car based travel, showing full support for the associated strategic cycle and car park facilities and other elements which complete the Bus Connects concept. Urge collaboration amongst neighbouring Local Authorities so impacts of passing through may be lessened and impacts on quality of life enhanced. ([SD-C147-164, Joan Moore, LOKRA](#))
17. Transport: Currently within the village there is a lot of Traffic issues which cause many health issues for people living in the area. ([SD-C147-206, Patrick Healy](#))
18. Relates to traffic congestion along the Bohernabreena Road and Kiltipper Park, where all development should be planned in an 'integrated manner'. ([SD-C147-214, David Kennedy](#))
19. The Regional Assembly welcomes the Council's commitment to integrated transport and land use and to sustainable mobility.  
  
The Assembly make reference to RPO 8.1, which requires that the integration of transport and land use. Planning shall be consistent with the Guiding Principles set out in Section 8.3 of the RSES. Further reference is made to RPO's 8.16 and 8.4 which require that land use plans within the GDA demonstrate consistency with the NTA's Transport Strategy for the Greater Dublin Area.  
  
The Assembly recommends early engagement with the transport agencies to ensure the integration of transport and land use in the South Dublin CDP and in the preparation of Local Transport Plans for selected settlements in the Region (RPO 8.6) to help achieve this mode shift. ([SD-C147-31, Pauline Riordan, EMRA](#))
20. OPR advises the planning authority to continue to work proactively with transport agencies and Irish Water to progress projects that deliver infrastructure to support development in strategic development areas consistent with the RSES. ([SD-C147-144, Maude Ni Bhrolchain, Office of the Planning Regulator](#))
21. The need for consultation with transport agencies including the NTA and TII, and neighbouring planning authorities, during the preparation of land use and transport plans, and to ensure that policies and development management standards regarding access to national roads including exceptional circumstances are consistent with the Spatial Planning and National Roads Guidelines (2012). ([SD-C147-144, Maude Ni Bhrolchain, Office of the Planning Regulator](#))
22. Transport should be a focus within this CDP, with a focus on settlement nucleation to protect rural areas from an explosion of vehicle dependant, dispersed and urban-generated settlements.  
([SD-C147-169, South Dublin Conservation Society, South Dublin Conservation Society](#))
23. Transport should be a focus within this CDP, with a focus on settlement nucleation to protect rural areas from an explosion of vehicle dependant, dispersed and urban-generated settlements.  
([SD-C147-169, South Dublin Conservation Society, South Dublin Conservation Society](#))



## Public Transport

1. To place more emphasis on connecting to existing rail services in the County and give serious consideration to prioritising extra rail lines over roads to transport greater number of people and reduce CO2 emissions. ([SD-C147-15, Tony O Hara](#))
2. Existing public transport is overcrowded, inefficient and unreliable. ([SD-C147-18, jos fullam](#) [SD-C147-5, Conor Mulligan](#))
3. Why is Clonburris SDZ not a stop on the future DART line from Dublin to Celbridge? ([SD-C147-25, Thomas Gallagher](#))
4. Dedicated Bus Lanes should be on all major roads. ([SD-C147-100, Olive O'Malley](#))
5. In the interim period between now and the completion of the BusConnects project, road space allocation should continue to favour sustainable modes including public transport and bus priority measures should be put in place where possible. Increasing the number of bus shelters available across South Dublin County will also be beneficial to public transport users and building these in high population density/footfall locations should be prioritised. ([SD-C147-95, Dublin Bus, Dublin Bus](#))
6. While there are large Park and Ride facilities currently located in South Dublin County, specifically at Adamstown (200 vehicle capacity), Cheeverstown (312 vehicle capacity) and the Red Cow (727 vehicle capacity) further enhancement of these facilities should be examined to future proof these facilities against the rising urban population. New Park and Ride facilities should also be developed in line with the BusConnects plan to ensure this infrastructure works cohesively with the existing and planned future public transport network. ([SD-C147-95, Dublin Bus, Dublin Bus](#))
7. It is Dublin Bus's view that the bus network of the future must have: increased capacity, improved bus priority, improved network speed, improved journey times, more consistent journey times. To achieve this, SDCC and Dublin Bus must prioritise public transport to help build a sustainable Dublin. This means:
  - Implementation of BusConnects
  - Expansion of Dublin Bike Scheme to South Dublin County
  - Introduction (subject to regulation) of e-scooters to the public transport value chain
  - Shift investment towards public transport
  - Implementation of Account Based Ticketing
  - Implementation of Mobility-as-a-Service
  - Transition towards a zero-emission fleet
  - Introduction of demand management measures
  - Prioritise high density developments near high quality public transport hub.

All these options should be up for discussion with a view to building consensus around the options which work best for South Dublin County. The urban bus is and will continue to be by far the largest mode of public transport in our fast-growing city for decades to come. It is critical we are ambitious and invest in our bus network so it meets the needs of people, supports economic growth and also meets our social and environmental responsibilities. ([SD-C147-95, Dublin Bus, Dublin Bus](#))

8. Buses to be converted to electric or Biofuel or some alternative energy source than carbon fuels. ([SD-C147-73, Eugene Barrett, Knocklyon Network](#))
9. Public transport must be improved as an option and combined with carpools and cycle garages. ([SD-C147-73, Eugene Barrett, Knocklyon Network](#))
10. The Chamber support necessary transport infrastructure projects including BusConnects and the Luas and DART expansions. ([SD-C147-156, Marian O'Donnell, Dublin Chamber](#))
11. Submission suggests providing public transport between public services, to reduce reliance on the private car and increase well-being. ([SD-C147-96, Kieran Walsh, Public Participation Network](#))
12. The submission raises concerns on the impact of geographical centralisation of services making access to services difficult, it is recognised that marginalised families/people are less likely to access services if accessibility to transport is poor. An accessible transport service would be welcomed. ([SD-C147-150, Joe RYNN, South Dublin Children Young People Services Committee](#))

#### **Rail - Heavy**

1. The rail line from Kildare to Dublin is an underused resource there must be a way of increasing the use of this service. The provision of a large car park at the new station defeats the purpose. The station is of little value to Clondalkin. ([SD-C147-113, John Stephens](#))
2. In relation to sustainable movement, the submission states consideration should be given to a spur off the Kildare rail line to Newcastle/Rathcoole, with park and ride facilities provided. ([SD-C147-122, Proinsias Fhlannchadha](#))
3. Infrastructure & Utilities:  
Active engagement between SDCC and Irish Rail should take place on any future projects which pass stations in South Dublin. Active engagement should also take place between the TII and other public transport providers. ([SD-C147-64, Emma Flanagan, Cairn PLC](#))

#### **Rail - Light**

1. TII is in the process of finalising Technical Guidelines for Development Light Rail Environment. Any works adjacent or interfacing with Luas infrastructure must be carried out in accordance with TII's 'Code of engineering practice for works on, near, or adjacent the Luas light rail system' available at <https://www.luas.ie/work-safety-permits.html>. ([SD-C147-36, Michael McCormack, Transport Infrastructure Ireland](#))
2. This submission highlights support for Metrolink to the County connecting to Metro North. ([SD-C147-172, John Lahart](#))
3. Improve public transport network, expand the light rail system, extend the Luas from Saggart to Hazelhatch, expand the Luas into Dun Laoghaire-Rathdown area, provide Metro South and Dublin South West rail, provision of short localised bus routes and

orbital routes.

([SD-C147-106, Liam Sinclair, Green Party Tallaght](#))

4. This submission deals with the continuation of Metrolink to South West Dublin, which will have many benefits on the environment and population health, as well as reducing journey times in cars. ([SD-C147-55, Sean Ward](#))
5. Transport: The continuation of Metrolink to South West Dublin, with inclusion in the CDP under TM1 Objective 5: To balance the needs of road users and the local community with the need to support the development of a sustainable transportation network and Objective 6: to facilitate sustainable new development in the County.  
([SD-C147-171, Pauline Foster, Recorders Residents Association](#))

## Roads

1. Requests that a ring road be built around Newcastle soon to prevent accidents. In the interim SDCC to consider an outright HGV ban, a HGV ban at certain times or increased traffic calming measures. ([SD-C147-54, Fergal Britton, ReNewcastle Community Group](#))
2. Calls for improved traffic lights coordination at majors junctions serving the Clonburris SDZ lands including at the T junction into Grange Castle near Milltown on the old Nangor Road are causing traffic tailbacks and pollution. ([SD-C147-25, Thomas Gallagher](#))
3. The submission refers to specific Roads and Transportation proposals at Colmanstown Lane which are put forward to address difficulties currently encountered by landowners with agricultural and residential properties.  
  
It is considered that the Plan needs to considered the Trans T Network proposal to further upgrade the N7 National Route to one level below Motorway standard which will require upgrades to existing at grade junctions.  
  
The submissions puts forward proposals aimed at addressing existing access issues onto the N7 in this area. ([SD-C147-4, Donal Pat Cleary](#))
4. Traffic issues within the he Neighbourhood Area of Rathcoole/Saggart /Citywest need to be addressed. ([SD-C147-11, Asa holmstrom holmstrom](#))
5. Calls for the new Development Plan to strike a balance between public transport provision and the ongoing need to cater for private modes of transport. Good quality road provision will ensure the economy and residents' access to services is crucial. ([SD-C147-75, Hugh Durkin Nigel Smith](#))
6. The new Development Plan should provide greater certainty to private landowners affected by major infrastructure proposals, such as This long-term road objective relates to the N81 Hollywood Cross to Tallaght Road Improvement Scheme where the remains no certainty about delivery timescales or whether the road scheme will ultimately come forward. These infrastructure proposals can place significant restrictions on the ability of landowners to invest in their properties and land. They also create significant uncertainty on landowners in respect of potential compulsory

purchase and major works that could be undertaken on their lands. ([SD-C147-75, Hugh Durkin Nigel Smith](#))

7. TII request that the protection of the safety, carrying capacity and efficiency of the existing/future national roads network and Luas network is maintained:
  - That the County Development Plan reflects the provisions of official policy (Project Ireland 2040: National Planning Framework and National Development Plan, 2018 - 2027, Smarter Travel (DTTAS, 2009), (SFILT) Investing in our Transport Future (DTTAS, 2015), the provisions of the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012), and the Eastern and Midland Regional Assembly Regional Spatial and Economic Strategy (EMRA RSES)) and national objectives in relation to spatial planning, national roads and Luas.
  - That SDCC policies and objectives are developed to ensure that the carrying capacity, operational efficiency, safety and national investment made in national roads is safeguarded.
  - That the Council consider the implications of land use policies on the strategic national road network in the area as a criterion in determining the future land use zoning strategy to be outlined in the Draft Development Plan and the respective Core Strategy.
  - An integrated approach to land use and transportation solutions throughout the County should be undertaken such that local traffic generated by developments is catered for primarily within the framework of the local (i.e. non-national) road network.
  - Local development contributions schemes to be used to pay for the costs of accommodation of local development proposals connecting to the national roads. Any additional connectivity to national roads should be developed in accordance with the requirements of Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012).
  - That the strategic transport function of national roads and associated junctions should be maintained and protected in statutory land use plans.
  - there is a requirement to carefully consider a review of existing development plan policies related to local roads adjacent to national roads taking account of Section 28 Guidance Spatial Planning and National Roads Guidelines for Planning Authorities
  - An integrated approach to the design of development areas should include a set of principles and criteria designed to ensure a high standard of access by public transport, foot and private car. ([SD-C147-36, Michael McCormack, Transport Infrastructure Ireland](#))
8. Calls for SDCC to consider providing a 2nd slip road off the R120 at Commercial Hurling Club to connect with the N7 heading south bound to allow traffic leaving Newcastle and Greenogue access the N7 directly without the need to stop at the roundabout.

The Western Dublin Orbital Route, as indicated in the current Plan, by by-passing Newcastle village or similar alternative route, would benefit and enhance the wellbeing of residents in Newcastle, which have seen an increase in the volume of traffic through its village year on year over the last decade. ([SD-C147-85, Eugene Wisely](#))

9. In order to protect the strategic transport function of the national roads, including motorways, the NTA recommends that any development objectives should be in accordance with the DOECLG Spatial Planning and National Roads Guidelines (2012), and that this should be referenced in the Development Plan. National Strategic Outcome 2 of the National Planning Framework indicates the need for 'Maintaining the strategic capacity and safety of the national roads network including planning for future capacity enhancements'. ([SD-C147-29, Mick Mac Aree, National Transport Authority](#))
10. A key issue for the next development plan is to ensure that policies protect the strategic function of national roads, maximise the benefits of existing and planned public transport investment and that local policies and development management standards regarding access to national roads including exceptional circumstances are consistent with the Spatial Planning and National Road Guidelines (2012). ([SD-C147-144, Maude Ni Bhrolchain, Office of the Planning Regulator](#))
11. More soundproofing along the M50, possibly using recycled plastic to create barriers. ([SD-C147-141, Ross O'Mullane](#))
12. Calls for better and more consistent speed bump design and provision. Remove pedestrian railings at junctions and have consistency in the layout of junctions. ([SD-C147-141, Ross O'Mullane](#))
13. Plan for infrastructure related to automated electric vehicles now. ([SD-C147-141, Ross O'Mullane](#))

### **Sustainable Modes**

1. Submission suggests accelerated delivery of public transport in tandem with residential and commercial developments in SDZs, the electrification of Kildare rail line and segregated cycling infrastructure should be prioritised and provision of orbital bus routes in the county. ([SD-C147-202, Cllr Alan Hayes](#))
2. Every effort must be made to change peoples over dependence on car travel. Safe ways of walking, cycling to schools must be developed. People should be encouraged to walk or cycle for short trips by making it safe to do so and having facilities for parking cycles and safely crossing roads. ([SD-C147-73, Eugene Barrett, Knocklyon Network](#))
3. Support electric car charging stations which should be integrated into all residential and commercial planning applications. ([SD-C147-94, Elizabeth Hickey](#))
4. Public transport capacity needs to be examined on buses and the Luas, especially in light of Covid-19 social-distancing restrictions. ([SD-C147-106, Liam Sinclair, Green Party Tallaght](#))

5. The OPR welcomes the proposal to examine the current movement patterns around the county as part of the review of the plan. In this regard it is essential for the planning authority to promote alternatives to the private car in the county in order to meet the requirements under section 10(2)(n) of the Act.
6. The OPR encourages the planning authority to include modal shift targets to be achieved over the plan period, aligned to relevant implementation and monitoring measures, in order to achieve meaningful improvements in GHG emissions and energy use.

Sustainable settlement and transport strategies are promoted for urban and rural areas with measures to reduce GHG emissions, reduce energy usage and to adapt to climate change. ([SD-C147-144, Maude Ni Bhrolchain, Office of the Planning Regulator](#))

7. The OPR recommends that the plan commit to the proactive implementation of the Design Manual for Urban Roads and Streets (as revised in 2019) in the required locations, consistent with RPO 9.10, will also assist sustainable and active transport modes, in addition to improvement in the street environment and overall quality of life of urban areas and settlements of all sizes. ([SD-C147-144, Maude Ni Bhrolchain, Office of the Planning Regulator](#))
8. Requests the enhancement of public transport provision and retrofitting public and cycle facilities in consolidation areas in association with key stakeholders and statutory providers.

Requests that zoned land in the defined consolidation areas be considered for transport and accessibility upgrade and investment, including bus network redesign which is underway, to ensure suitable sites for development are not delayed by integrated land use and transport policy or infrastructural investment. ([SD-C147-224, Cunnane Stratton Reynolds, Cunnane Stratton Reynolds](#))

## **Walking/Pedestrian**

1. Would like to see greater permeability between estates and permeability between estates and parks be increased during the period of this plan. ([SD-C147-49, Niall Charleton](#))
2. Sustainable Movement - Connection people to work, education, health and amenities Two key challenges addressed here.
  1. Bring people closer to work, education and the services they require.
  2. Prioritisation of cross radial routes linking our three main towns and outlying villages is essential for quality of life, travelling times and economic growth. ([SD-C147-61, Peter Byrne, South Dublin Chamber](#))
3. The management of space in town centres should deliver a high level of priority and permeability for walking, cycling and public transport modes. The key outcome of such an approach would be town centres that are accessible, attractive, vibrant and safe, as places to work, live, shop and engage in community life. ([SD-C147-29, Mick Mac Aree, National Transport Authority](#))

## Community Services

### Community Centres and Facilities

1. We need to invest in youth centres in every local community as well as after school and weekend youth programmes. ([SD-C147-56, Paul Murphy](#))
2. Calls for a review of council funded community centres to ensure that they are offering a wide range of formal and informal activities for all ages. ([SD-C147-134, Teresa Costello](#))
3. Additional community centres should be provided to facilitate the growing demand in areas such as Kiltipper, Marlfield and Tallaght Town Centre. ([SD-C147-134, Teresa Costello](#))
4. The submission highlights the future population growth, especially in the western parts of the county and requirements for additional community centres and active travel infrastructure. Currently SDCC and Sports Partnership help clubs to develop facility plans and coaching, but the real requirement is the certainty of financial supports. ).([SD-C147-147, SDCSP](#) [SD-C147-202, Cllr Alan Hayes](#))
5. Community Services - Strong community is where everyone wants to live. More strong urban centres with active green spaces provided. Centres are essential to serve the needs of the community ([SD-C147-61, Peter Byrne, South Dublin Chamber](#))
6. Request that local community centres and leisure facilities, bolster and reinforce community ties and are climate-friendly developments, obviating as they do, the need for additional commuting. ([SD-C147-128, John Lahart](#))
7. The previous Development Plans envisaged the neighbourhood centres would provide local community facilities this has not worked and communities have been left overly-dependent on schools for meeting venues / clubs. ([SD-C147-128, John Lahart](#))
8. In preparing the draft County Development Plan, Coillte request that the Council support the provision of accessible recreational, community facilities in the county. ([SD-C147-53, Coillte](#))
9. The submission suggests youth amenities are required across the county, both indoor and outdoor facilities, such as BMX tracks, skate park, a specific scrambler park alongside free or low-cost programs around drama, music, coding, art, activism. The provision of public seating and public toilets. The provision of meeting cafes and men/women sheds and women sheds. ([SD-C147-198, Carly Bailey](#))
10. Welcome support for the Arts, including art installations, pop-up festivals, additional small theatre spaces in all areas and the concept of outdoor swimming pools. ([SD-C147-198, Carly Bailey](#))
11. Request that services in community facilities are reviewed and should address the requirements of: Meeting Space; Creative Space; Indoor Sports Space (which is predominantly provided by private clubs); Arts and Culture Space; Library Space; Sports arena space & Swimming Pool Space. ([SD-C147-128, John Lahart](#))



12. The submission expresses concern that parts of SDCC are some of the most disadvantaged communities in Ireland, housing, community development/facilities, childcare, economic development should be enhanced and prioritised. ([SD-C147-202, Cllr Alan Hayes](#))
13. Raises concerns over the lack of angling amenities in South Dublin County. ([SD-C147-205, Fergal Scully](#))
14. Dublin Chamber request that the integration and consideration of community needs are input into planning conditions and zoning. Consideration of partnerships between industry and communities to develop mixed-use spaces. ([SD-C147-156, Dublin Chamber](#))
15. Provide increased leisure centres in SDCC with pitches, swimming pools and high-class training facilities. Enhance the existing library services. ([SD-C147-94, Elizabeth Hickey](#))
16. To ensure there is development of sports amenities in line with any housing development throughout the county; ([SD-C147-214, David Kennedy](#))
17. Adequate childcare provision should be available in appropriate locations, near schools, villages/towns and transport routes. ([SD-C147-106, Green Party Tallaght](#))
18. The new plan should ensure full implementation of the 'Our Public Libraries 2022' Strategy and successors. ([SD-C147-106, Green Party Tallaght](#))
19. Submission supports existing cultural and sporting amenities in the county but seeks to expand these types of facilities. Each town should have its own flagship cultural amenity. ([SD-C147-106, Green Party Tallaght](#))

#### **Education:**

1. Calls for a secondary school in Newcastle. ([SD-C147-80, James McInerney Planning Consultant](#))
2. This submission states that the SD CDP 2022-2028 should include policy and objectives which support the provision of new schools, while protecting what already exists, as well as the development of infrastructure and amenities. ([SD-C147-116, Department of Education & Skills](#)).
3. The inclusion of a community and infrastructure land use zoning for the county. Alternatively, SLO (Specific Local Objectives) for school provision can be used.  
  
School provision should be located in built up areas in order to school the increasing population of the county while achieving compact growth.  
  
That the CDP's zoned lands be flexible for the development of schools. ([SD-C147-116, Department of Education & Skills](#))



## Parks & Open Space

1. Requests that SDCC partner with local schools, youth organizations, men's shed etc to organize planting of meadows, or for creating organic gardens. ([SD-C147-25, Thomas Gallagher](#))
2. The submission considers that all parks should include sensory and play trails for people with disabilities including communication boards and designated play times, sensory units and accessibly changing rooms should be provided in public buildings. ([SD-C147-198, Carly Bailey](#))
3. According to the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas published by Environment, Heritage and Local Government, a minimum of 2 hectares per 1,000 population is recommended for public open space. As part of the new housing development at Graydon in Newcastle, a two-hectare public park will be provided, however as the population of Newcastle is expected to reach approx. 6,000 residents by mid-2021, the park is too small to cater for these numbers. The proposed development plan should identify an area to extend the park in line with the area to population ratio recommended in the above document. ([SD-C147-85, Eugene Wisely](#))
4. Rathcoole Park needs to be protected for its ecological and biodiversity function in conjunction with its use as a recreational amenity. A balance needs to be achieved between its recreational use and ecosystem function by removing the prospect of other uses or amenity related development to ensure at least its present form is maintained into the future.  
  
Requests that Rathcoole Park be extended to include Rathcoole Woodlands and the GAA lands and re-designate as a Regional Park. ([SD-C147-86, Four Districts Woodland Habitat Group](#))
5. Ask SDCC to consider turning some of the green spaces into allotments for people who do not have large gardens or indeed no garden at all could rent a space and grow their own vegetables etc. ([SD-C147-83, Geraldine Kelly](#))
6. This submission seeks well-designed, accessible, high quality, well maintained active recreational facilities, both outdoor and indoor, to accommodate all clubs which form part of the GAA. ([SD-C147-112, Jim Brogan Planning and Development Consultant](#))
7. The submission also gives light to the facilitation of the maximisation of the use of, in particular, South Dublin's existing recreational assets, both public and private. ([SD-C147-112, Jim Brogan Planning and Development Consultant](#))
8. This submission is in support of the WORK residents association and their submission which related to the creation of parking facilities at Tymon Park, which currently acts as a positive community facility for the county. ([SD-C147-173, Pamela Kearns](#))
9. The submission raises concerns that with the estimated increase in population and construction of smaller dwellings sizes, the need for public green open space is critical to serve the communities and provide a link to nature.
10. ([SD-C147-106, Green Party Tallaght](#))

11. Tymon Parks improvements such as providing a wider variety of trees, addressing the noise from the M50, repurposing some of the playing pitches for other uses such as allotments and community farms, better playgrounds, raising the level of the lake, providing an amphitheatre, bbq areas, bonfire areas, urban orchard, a running track, boat rental, update the gates, nudist area, water park and hot springs, a scrambler and BMX park. ([SD-C147-141, Ross O'Mullane](#))
12. Submission suggests provision of a multi-generational destination parks with the use of 'Crosbie gates' as opposed to 'kissing gates' for accessibility. ([SD-C147-96, Public Participation Network](#))

## **Delivery**

1. If community facilities close or are not accessible, it is essential that the service they provide can be delivered in other ways. The need for more innovation community service delivery should be reflected in the new SDCC Development Plan. ([SD-C147-75, Hugh Durkin Nigel Smith](#))
2. The submission suggests the need for the establishment of a meeting framework with relevant representatives and multi-disciplinary team of senior decision makers within the council to develop a 'County Sports Plan' in line with the 'National Sports Policy 2018-2027'. ([SD-C147-147, Thos Mc Dermott, SDCSP](#))
3. Highlights that a more innovate community service delivery should be provided for within the new Plan. ([SD-C147-97, BOC Gases](#))
4. Would like to see significant improvements in the angling amenities of South Dublin County, provide lakes of high quality, and achieve funding and leadership from the local authority. Existing water courses such as Grand Canal, Crockagh Park, The Liffey should be improved and enhanced in terms of stock levels, increased protection and weed control. ([SD-C147-205, Fergal Scully](#))
5. Suggests a survey of waterways in the county in relation to their suitability for Angling amenities suitable for urban environments, also fishery management to protect amenities from poachers and attract senior anglers and younger novices to the sport is essential. ([SD-C147-205, Fergal Scully](#))
6. Need for publicly funded Community Services which should be funded by development levies in the new development areas of: Tallaght, Ballycullen, Scholarstown and CityWest as community facilities in the Knocklyon and Firhouse areas have been privately funded predominantly by local communities. There is no publicly-funded performing arts centres outside the county town; no meeting rooms and no leisure facilities, in spite of the millions collected in development levies in the last two decades. ([SD-C147-128, John Lahart](#))
7. The planned amenities provision under the Citywest LAP (the Fortunestown LAP), Knocklyon, Ballycullen, Scholarstown, Firhouse area and future development for Tallaght are inadequate and there needs to be a corresponding level of amenities to serve existing and future populations. ([SD-C147-128, John Lahart](#))

8. Request SDCC examine DLRCoCo's Samuel Beckett Centre on Ballyogan Road in Sandyford- phase one of which has been completed where it was funded from Development Levies. ([SD-C147-128, John Lahart](#))
9. Development Levies should be ring-fenced into landmark Community Facilities for new development areas to avoid commuter traffic being continuously displaced from local areas and in commuters going 'cap-in-hand' to schools and other private facilities for meeting and leisure place. ([SD-C147-128, John Lahart](#))
10. The submission notes that community and voluntary groups are experiencing huge insurance costs and they would like to see the provision of group insurance schemes especially for low risk activities/groups. ([SD-C147-96, Public Participation Network](#))
11. Funding and grants should be targeted to disadvantaged areas suffering from deprivation, which have specific needs. ([SD-C147-96, Public Participation Network](#))
12. The new Plan should seek to address barriers to access such as transport and associated costs, and long waiting lists for mental health and disability services. ([SD-C147-150, South Dublin Children Young People Services Committee](#))
13. The submission raises concerns that community services need to be upgraded or provided for prior to the completion of developments. ([SD-C147-106, Green Party Tallaght](#))
14. Submission welcomes the audit of community infrastructure in the county. ([SD-C147-106, Green Party Tallaght](#))

## **Social Inclusion**

1. Angling makes a positive contribution to mental health and well-being. ([SD-C147-205, Fergal Scully](#))
2. Submission offers to share the results of a community wellbeing survey which will be the PPN's vision for the county. Some aspects could be incorporated into the new Plan. ([SD-C147-96, Public Participation Network](#))
3. The submission states South Dublin County has a growing population and SDCYPSC must ensure access and availability to services to meet the needs of families, especially young people, early years, education, health, and recreation. ([SD-C147-150, South Dublin Children Young People Services Committee](#))
4. The submission refers to a service capacity and availability analysis was carried out by CYPSC and concluded that service provision is not proportionate to need. Some of the most deprived areas in the County were areas of least service provision for mental health, wellbeing and justice services. There are gaps in service provision for young people relating to addiction, mental health, education options, disability services and lack of supports. ([SD-C147-150, South Dublin Children Young People Services Committee](#))
5. The South Dublin CYPSC has the following key priority areas:

- Active & Healthy: support and enhance service provision relating to mental health, drug & alcohol, disability and implement 'Healthy Ireland Strategy',
- Achieving in all areas of learning and development: through parenting, early school leaving and educational transitions,
- Safe and protected from harm: providing family supports, youth justice and 'aftercare' supports,
- Economic Secure: developing and improving employment and training, service provision and housing needs,
- Connected & Respected: increase participation and engagement, development supports and facilities in new communities. ([SD-C147-150, South Dublin Children Young People Services Committee](#))

6. The assembly welcomes the recognition of the need to promote social inclusion and create sustainable communities in line with the principle of Healthy Placemaking which underpins the RSES. The submission makes further reference to RPO's for health placemaking set out in section 9.4 of the RSES with particularly reference to RPO's 9.2, 9.14 and 9.17.

The Assembly notes that the South Dublin LECP will require review in light of the adoption of the RSES, also noting the statutory role of the Regional Assemblies in the LECP process in ensuring consistency between the LECP, the development plan and the RSES. Also, welcomed is the stated intention to carry out social infrastructure assessments where required to inform the planning of future sustainable communities.

The Assembly welcome the intention to carry out social infrastructure assessments where required to inform the planning of future sustainable communities. ([SD-C147-31, EMRA](#))

## Economic Development

### Employment/Industry

1. SDCC need to consider a wide range of projects which are capable of being delivered in the area as the environs are drastically underserved when it comes to attracting tourists to the region. These will benefit the wider commercial environment greatly. ([SD-C147-2, Proinsias Fhlannchadha](#))
2. Greater detail is required for the zoning category of Employment to differentiate between lands identified for industry and more commercial/office-based activities. ([SD-C147-2, Proinsias Fhlannchadha](#))
3. The period between now and the preparation of the draft Development Plan will be significant in observing whether working patterns have changed temporarily or permanently. Sufficient flexibility should be built into the draft Development Plan to allow it to respond to the potential evolution in working locations and the wider economy. ([SD-C147-75, Hugh Durkin Nigel Smith](#))
4. Submission suggests that all businesses should be financially supported, and some sectors should have special commercial rates or zero rates. ([SD-C147-198, Carly Bailey](#))
5. The submission suggests data centres should not be welcome, that land is a scarce resource and these provide low level employment. ([SD-C147-198, Carly Bailey](#))
6. Submission suggests, whether Tymon Park or another park could hold concerts/festivals, launch an App to advertise social enterprises and events throughout the county, advertising space sold by SDCC should be ethical. ([SD-C147-198, Carly Bailey](#))
7. No further data centres should be permitted or constructed and any that have been permitted but not yet under construction should be cancelled. ([SD-C147-56, Paul Murphy](#))
8. Calls for an enterprise/digital hub in Clondalkin to facilitate remote working without infringing on space in the local libraries or coffee shops. ([SD-C147-187, Su Murray](#))
9. It is requested that Enterprise and Employment lands zoned in the Cheeverstown area (zoned within the South Dublin County Development Plan 2016-2022 and the Fortunestown LAP 2012 (as extended)) should be retained, noting that some Enterprise and Employment lands (or Objective EP2 lands per the LAP) experienced a change of zoning upon adoption of the South Dublin County Development Pan 2016-2022. ([SD-C147-138, Rohan Holdings Ltd.](#))
10. Support given for policy within the Development Plan that aims to create conditions to attract internationally mobile investment and opportunities for indigenous enterprise growth in line with national and regional frameworks and considering innovative ways of achieving a resilient and prosperous future for South Dublin County. (NPF supports, encouragement of FDI in the county, policy and objectives) ([SD-C147-138, Rohan Holdings Ltd.](#))

11. This submission deals with Economic Development & Employment, relating to flexibility of zoning frameworks within the county. Retail zoning should be more flexibility so that there should be no need for 'not permitted' development. Out of Centre retail centres should be encouraged (works well during Covid-19). ([SD-C147-170, Daragh Cagney](#))
12. Economic Development & Employment - Requirements for Growth:  
The completion of Clonburris/Adamstown SDZ's, the N7 development plan and Tallaght LAP are important anchors for economic growth, as well as having appropriate lands zoned for commercial and industrial uses.  
  
The growth of third-level education, multi-use buildings (due to covid-19, development of transport hubs and increasing medical and office provision in Tallaght should all be provided for in the Plan. (acknowledge the submission and SDCC will continue to promote the delivery of the 2 SDZ and Tallaght LAP.) ([SD-C147-61, South Dublin Chamber](#))
13. Policy examples supplied are as follows: 'To support An Post in the provision of new postal facilities and the enhancement of existing facilities, including operational requirements, in the County "To facilitate the provision of postal infrastructure at suitable locations in the County."To promote the integration of appropriate post office facilities within new and existing communities that are appropriate to the size and scale of each settlement.' ([SD-C147-62, Muirenn Duffy](#))
14. Other issues that An Post have stated include Car Parking and Deliveries & Access throughout the County. ([SD-C147-62, Muirenn Duffy](#))
15. Other issues that An Post have stated include Car Parking and Deliveries & Access throughout the County. ([SD-C147-62, Muirenn Duffy](#))
16. Economic Development & Employment: Cairn homes state that enterprise and employment lands should be more flexible in their approach to development (due to covid-19) and allow a more flexible approach to a wide range of uses on these lands ([SD-C147-64, Emma Flanagan, Cairn PLC](#))
17. Submission would like to see SDCC support local employment opportunities within communities, to reduce commute times and which are accessible by public transport. ([SD-C147-96, Kieran Walsh, Public Participation Network](#))
18. The submission suggests the provision of 'work hubs' or 'safe share public offices' within the communities to facilitate home working. ([SD-C147-106, Liam Sinclair, Green Party Tallaght](#))
19. Further economic development and employment should be supported at Baldonnell and Kingswood to enhance commercial developments and provide appropriate zoning for further growth. ([SD-C147-179, Development 8, Development 8](#))
20. The Assembly welcomes the inclusion of a section on Economic Development and Employment as part of the Issues Paper. Ensuring Economic Opportunity for all is one of the three key principles of the RSES, which sets out for the first time in Irish planning an economic strategy that is intrinsic to a regional spatial plan.

The submission makes reference to chapter 6 of the RSES and the identification of locations for strategic employment development being consistent with the Growth and Settlement Strategy of the County Development Plan. It is further outlined that the new CDP should also be informed by Section 8.3 - Integration of Transport and Landuse in the RSES, which set out guiding principles (Section 6.3) for the location of trip intensive developments such as large-scale retailing and strategic employment zones.

The submission recommends that the level of retail provision in the County be consistent with the retail hierarchy for the region as set out in Table 6.1 of the RSES. The Assembly also recognise the need for a new retail strategy for the region.

Reference is made to town centre renewal and RPOs 6.12-6.14 which support placemaking and the revitalisation of urban centres.

The submission makes further reference to the requirement for a review of the South Dublin LECP in light of the adoption of the RSES. ([SD-C147-31, Pauline Riordan, EMRA](#))

21. The Offices notes the quantum of land zoned for Enterprise and Employment including remaining undeveloped land and welcomes the proposed review of employment lands as part of the process of making a new plan.

The Office draws the planning authority's attention to the guiding principles for the location of strategic employment and investment prioritisation, and the guiding principles for the location of trip intensive developments in sections 6.3 and 8.3 of the RSES respectively. It is also advised that the review should also consider the requirements for lower density employment uses to inform a clear direction in the plan for such uses.

The coordination of economic development and employment with population growth and transport to ensure trip intensive uses are directed to appropriate locations, lands with strategic employment potential are retained for that purpose and lower intensity employment is encouraged to relocate from areas with strategic redevelopment potential for employment / mixed use. ([SD-C147-144, Maude Ni Bhrolchain, Office of the Planning Regulator](#))

## Quarries

1. Seeks SDCC to ban extractive industries in the area, fracking and mining etc. ([SD-C147-197, South Dublin Environmental Network](#))
2. Roadstone Requests that the following be incorporated within the CDP:
  1. Recognition of the importance and benefits of the quarry and extractive industry, (similar to how the existing CDP does) and recognise National Policy Objective 23 of the NPF, RPO 6.7 of the RSES in support of extractive industries and Project 2040.
  2. Three important points that statutory planning policy needs to address:
    - Importance of Extractive Industries and Aggregates



- Identifying and Protecting Reserves
  - Enabling Extraction of Aggregates
3. Outline of the economic value and significance of the aggregates and minerals sector in the County of South Dublin, emphasising the sectors significance and added value in terms of the local, regional and national economy (Employment generation and providing raw materials to the construction industry).
  4. That South Dublin has significant but finite mineral resources and it should be the aim to safeguard areas of significant resources from incompatible developments to ensure the continued viability of the extractive industry, whilst of course, ensuring that environmental, rural, scenic and residential amenities are protected.
  5. It is submitted that the Council should have due regard to Roadstone Ltd.'s property assets within ([SD-C147-107, Roadstone Limited](#))

## Retail

1. Request that the Development Plan make reference to, and specifically cater for changing trends and formats of retailing, with sufficient flexibility introduced to enable existing retail destinations to adapt and compete in a rapidly changing context. Particular reference to Fonthill Retail Park. ([SD-C147-152, Fonthill Commercial Developments Ltd](#))
2. Another issue raised relates to changes in the way people shop and the move towards online shopping due to Covid-19. They state that the value of out of centre/retail warehouse developments can not be undervalued at this time due to covid-19 and have asked for more of these developments to be built, where appropriate and sustainable. ([SD-C147-170, Daragh Cagney](#))
3. It is also of paramount importance that the position of Liffey Valley within the retail hierarchy for South Dublin is not only maintained within the new Development Plan, but that it is strengthened as well. The Regional Spatial and Economic Strategy (RSES) designates Liffey Valley as a Level 2 Major Town Centre/County (Principal) Town Centre and the Development Plan being brought forward must align with the regional policies of the RSES that recognises the retail importance of Liffey Valley. ([SD-C147-109, Muirenn Duffy](#))
4. This submission states that given the projected population increase in South Dublin, it is submitted that the future provision of retail facilities within the Counties primary settlements should be considered and facilitated as part of the new South Dublin CDP. Retail Policy framework should be drafted as part of the South Dublin CDP to attract new retail floorspace at appropriate locations. South Dublin County Council should consider the future provision of retail convenience floorspace holistically to ensure that settlements are adequately served by such floorspace.

Safeguarding of delivery and access routes and spaces to undertake deliveries are vital to the operation of supermarkets within the county.



Request that no policies are introduced that could lead to any restrictions on deliveries as part of the South Dublin CDP.

Preparation of an updated retail strategy would be welcomed.

Protection given to existing District Centres and Village Centres for retail provision.

Future policies should also recognise the design of modern retail formats, which should allow for flexibility. ([SD-C147-60, Muirenn Duffy](#))

5. Retail: Review of the retail hierarchy within the county, with a review of vacancy rates and town centre health checks being of benefit.

Cairn homes have also requested that consideration be given to the level of retail proposed for Clonburris. This will require changes to the SDZ scheme but believe that changes to the retail hierarchy with the emerging CDP is what should be looked at first. ([SD-C147-64, Cairn PLC](#))

6. The Office notes that EMRA will support and drive the preparation of a new retail strategy for the region under the requirements of the Retail Planning Guidelines for Planning Authorities (2012), and that RPO 6.11 requires the future provision of significant retail development to be consistent with the aforementioned guidelines, and retail hierarchy at table 6.1 of the RSES until such time as this hierarchy is updated. ([SD-C147-144, Office of the Planning Regulator](#))

## Tourism

1. SDCC need to consider a wide range of projects which are capable of being delivered in the area as the environs are drastically underserved when it comes to attracting tourists to the region. These will benefit the wider commercial environment greatly. ([SD-C147-2, Proinsias Fhlannchadha](#))
2. In preparing the draft County Development Plan, Coillte request that the Council continue to support sustainable rural based enterprises such as tourism/recreation and forestry in the county and make adequate provisions and objectives to facilitate their delivery. ([SD-C147-53, Aoife McCarthy, Coillte](#))
3. In preparing the draft County Development Plan, Coillte request that the Council support the provision of tourism infrastructure and visitor services at appropriate locations in the Coillte estate. ([SD-C147-53, Aoife McCarthy, Coillte](#))
4. Cycle tourism should be promoted within the plan. ([SD-C147-35, Dublin Cycling Campaign](#))
5. Recommends that the Woodtown Manor demesne lands, with their extensive road frontages onto the R115 and R113, present beneficial strategic development opportunities relating to integration with the adjacent suburbs and facilitating access to tourism and recreation in the foothills of the Dublin Mountains.

Recommends that the Oldcourt/Ballycullen neighbourhood be consolidated into the northern and eastern Woodtown area to support public infrastructure improvements in the area. ([SD-C147-131, Simon Clear & Associates](#))

6. Active travel will contribute to cycle tourism, enhance villages, improve public realm and built environment and will contribute towards cycle tourism initiatives.  
([SD-C147-94, Elizabeth Hickey](#))
7. Submission suggests the promotion of domestic tourism opportunities available within the Dublin Mountains, development of walking and cycling routes, outdoor pursuits whilst having regard to biodiversity and provision of appropriate signage. Public rights of Way should be identified, open and mapped.  
([SD-C147-106, Green Party Tallaght](#))
8. While the Core Strategy indirectly relates to the concerns of tourism, such as environmental walking, cycling and active sport and recreation and green infrastructure, Fáilte Ireland request more explicit reference to tourism and its economic importance.

Fáilte Ireland request an objective promoting collaboration with Fáilte Ireland and other tourism sector stakeholders in the future development of tourism in the County.

Fáilte Ireland, as a standard approach, typically requests that a key element of any emerging Development Plan should include a dedicated chapter on tourism in order to provide the required focus on tourism for the County as a whole. This enables decision makers and stakeholders to easily follow guidance in relation to tourism amenities and assets. It is considered in the case of South Dublin, and the more urban context of the Council area, that a Tourism and Recreation may be considered appropriate. The chapter should (a) encompass all of the policies and objectives relating to this important economic driver and asset, building on the actions and objectives set out in the wider Development Plan and (b) recognise the significant role that tourism and recreation plays in the overall operation and development of the County. In particular, Fáilte Ireland promotes the incorporation of the principles of sustainability in the tourism policy section of the County Development Plans (included in Appendix A of this Submission). Fáilte Ireland would also like to see tourism policies and objectives clearly set out where possible through the inclusion of maps in the draft Development Plan.

Key elements of the County's tourism potential remains reliant on access to private transport. Further support of key infrastructure is required in the forthcoming Development Plan such as public transport and cycle facilities through objectives and policies.

Fáilte Ireland note that the Council has prepared a 'Landscape Character Assessment of South Dublin County' (2015), and would like to see the continued protection of the County's landscape and tourism recognised as a potential sensitive receptor through the potential impact upon landscape.

Fáilte Ireland note that the Issues Paper does not contain a section focusing specifically on tourism, but that it does contain a number of references throughout.

Tourism can make an important contribution to the local economy and can be a key driver in this context. Fáilte Ireland wish to see this emphasis further detailed in the forthcoming Development Plan to enable tourism stakeholders develop into the future.

Fáilte Ireland supports the continued development of the 'Dublin's Outdoors' brand initiative by SDCC and its implementation through the County Tourism Strategy. It is considered that this should feature in the Development Plan.

Faillte Ireland recommends that the Council supports the development of a wide range of accommodation for tourists, particularly in areas which currently have limited offerings) and other local enterprises through Development Plan policies, objectives and zonings.

Faillte Ireland wish to see support for festivals in the emerging Development Plan.

Faillte Ireland wish to see an objective supporting continued collaboration with the Faillte Ireland and tourism stakeholders to develop Destination Development Plans in the county which may arise in the future. The development of Destination Development Plans can provide a comprehensive and holistic response to ensuring attractions are appreciated and appeal to visitors.,([SD-C147-228, Failte Ireland-National Tourism Development Authority](#))

9. Recommendation in relation to ECONOMIC AND TOURISM (ET) Policy 5 Tourism Infrastructure and associated provisions in the existing Plan.

Recommendation in relation to ECONOMIC AND TOURISM (ET) Policy 6 Greenways, Trails and Loops and associated provisions in the existing Plan.

Recommendation in relation to ECONOMIC AND TOURISM (ET) Policy 9 Rural Economy and associated provisions in the existing Plan.

Recommendation in relation to ECONOMIC AND TOURISM (ET) Policy 10 Mineral Extraction and associated provisions in the existing Plan. ([SD-C147-222, Keep Ireland Open, Keep Ireland Open](#))

10. Consider kayaking on the Dodder ([SD-C147-141, Ross O'Mullane](#))

11. Repurpose the quarry at newlandscross as a hotel. Make the Dublin mountains more of a destination with accommodation and variety of activities and provide a huge statue similar to christ the redeemer or the angel of the north.

Consider big initiatives that draw people in to the area such as the Tallaght science museum or the Clondalkin museum of contemporary art. ([SD-C147-141, Ross O'Mullane](#))

12. Calls for the Slade Valley Walk (Slade Valley Corridor and Heritage Trail) identified in the South Dublin Tourist Strategy 2015-2020 be completed as part of the county development plan and that it be extended past the Swiftbrook mill ponds, to be taken in charge by the Parks Department, to terminate the walk in Rathcoole Park. ([SD-C147-30, Alan Fairman, Rathcoole Community Council](#))

13. "Submission requests that SDCC take the area around Swiftbrook Mill in charge and include this area in the proposed Slade Castle to Brittas Greenway as per 2015-2020 Tourist Strategy. The submission further suggest that a parkland, historical and community hub with museum be provided at this location, as an amenity for the area and to contribute to the existing Green Infrastructure and promotion of wildlife". ([SD-C147-48, Millrace Residents association \(MRA\)](#))

14. A number of submissions deal with a public register of Public Rights of Way within the county, also looking for them to be identified, opened and mapped. ([SD-C147-222, Keep Ireland Open, SD-C147-106, Green Party Tallaght](#))
15. In collaboration with SDCC, it is proposed to develop a Masterplan for a fishing resort and boutique hotel as a tourist destination. ([SD-C147-180, Finnstown Castle Hotel, Finnstown Castle Hotel, Finnstown Castle Hotel](#))

### **Town Centres**

1. The Dublin Chamber requests that development and regeneration of town centres and urban hubs is provided through careful planning and a high-quality public realm. ([SD-C147-156, Marian O'Donnell, Dublin Chamber](#))

## Natural Heritage and Biodiversity

### Landscape Character

1. Requests that the landscape characteristics of Newcastle and Rathcoole as stated in the LCA are protected by specific objectives with measurable outcomes in the Plan to ensure their preservation and enhancement. Stony Hill Road/ Lane are worth noting and retaining for its more intact rural character.

Requests that the Plan has specific objectives and actions with measurable outcomes for sites of Geological Interest ([SD-C147-99, Ne Graver](#))

2. The Assembly welcome the intention that a Landscape Character Assessment will accompany the new CDP ([SD-C147-31, EMRA](#))
3. Suggested that the Local Authority consider/reconsider their Landscape Character Assessment (LCA) and identify landscape sensitivities vis a vis renewable energy developments. ([SD-C147-53, Coillte](#))

### Landscape Protections

1. Asks that the lands off the Belgard Road around Katherine Tynan House, Whitehall, adjacent to and between Newlands Cross cemetery, Ballymount Park, Naas Road, including the site of a Protected Structure be reinstated as Green Belt and given protection as it offers relief from the increasing high density development experienced within Tallaght. ([SD-C147-47, Jennifer Doyle](#))
2. Concerned that the continuing rapid expansion of the Greenogue Industrial area will eat into the existing Greenbelts towards Newcastle and we would like to see determination that this does not happen. The existing Greenbelts must be maintained. ([SD-C147-54, ReNewcastle Community Group](#))
3. The green area at Belgard road acts as a vital lung for the area and should be protected. Urban areas require green areas and existing green areas should remain untouched. ([SD-C147-158, Teresa Carroll](#))
4. Calls to include in the Plan a strategy to protect and enhance the special amenity order for Waterstown Park and the Liffey Valley, including the protection and enhancement of heritage structures including the Silver Bridge in Palmerstown. Request for SDCC to sign up to Biodiversity Irelands All Island Pollinator initiative and include a policy to eliminate the use of glyphosphates throughout the entire county.

Request for SDCC to promote and implement the planting of native trees and hedgerows and the protection of existing.

Request for SDCC to commit to greater coordination and consultation with local conservation groups to avoid habitat destruction during council activities. ([SD-C147-139, Fergal Mullally](#))

5. Submission raised concerns that the landscape is changing, it needs to be preserved to avoid coalescence, a transitional zone between rural and urban areas is recommended. It highlights that an EIA should be undertaken on all zoned lands, implement Biodiversity Action Plan, preserve the floodplains in Newcastle, create

additional designations for habitats within South Dublin County and increase number of TPO's. ([SD-C147-87, Deirdre tierney](#))

## **Biodiversity**

1. To promote Biodiversity SDCC should sign up to Biodiversity Ireland's All Island Pollinator initiative to improve and maintain Biodiversity within the county. ([SD-C147-44, Rebuild the Silver Bridge](#))
2. Calls for SDCC parks department to plant many wildflower meadows on all urban green spaces throughout the county to support pollinating species such as wild bees.  
Calls for SDCC to reduce its carbon footprint by reducing the amount of annual grass cutting to be done during the year by sowing wild flower meadows.  
The Griffeen river in Grange castle could further support wildlife by increasing the wild space around the river where it runs through grange castle.  
Requests that SDCC advises the community on not using traditional harmful weed killers and instead opt for non toxic organic weed killer.  
Requests that roof garden ecosystems are considered for all flat roof space on urban large-scale buildings providing their own eco system and cooling areas.  
Requests that SDCC partner with local schools, youth organizations, men's shed etc to organize planting of meadows, or for creating organic gardens.  
Large swathes of land between units in business parks - such as in Nangor Road Area in Grange Castle, Profile park, Baldonnel etc - could be left in a more natural state to provide corridors for wildlife and some wetlands /woodland or meadows instead of grass lawns or waste ground.  
Calls for nesting boxes for wild birds of prey.  
Calls for SDCC to encourage farmers to widen the area around hedgerows to encourage wildlife corridors. ([SD-C147-25, Thomas Gallagher](#))
3. Requests that SDCC partner with local schools, youth organizations, men's shed etc to organize planting of meadows, or for creating organic gardens. ([SD-C147-25, Thomas Gallagher](#))
4. Calls for SDCC to align its Biodiversity Plan with Planning proposals and assess planning applications against Habitats legislation. ([SD-C147-197, South Dublin Environmental Network](#))
5. Access to the natural environment for SDCC residents should continue to receive investment and priority. This investment should be undertaken in conjunction with the need to enhance biodiversity. ([SD-C147-75, Hugh Durkin Nigel Smith](#))
6. Submission suggests that a biodiversity plan is required, to improve and provide tree coverage, pollinator patches and wildflower meadows, encourage community gardening, encourage communities to apply for grants for heritage sites, protection of species and habitats. ([SD-C147-198, Carly Bailey](#))
7. Significantly increased attention needs to be paid to promoting biodiversity within the Council. Green spaces should be protected from development, but also diversified,

with investment in wetlands and other areas of biodiversity. ([SD-C147-56, Paul Murphy](#))

8. Access to the natural environment for SDCC residents should continue to receive investment and priority in conjunction with the need to enhance biodiversity. ([SD-C147-74, Hugh Durkin](#))
9. Highlights the benefits of biodiversity to physical and mental health. ([SD-C147-136, Niall Healy](#))
10. Suggests promotion of 1) protect non-designated biodiversity, 2) protect and enhance biodiversity, 3) incorporate any relevant habitat mapping, 4) ensure control & management of invasive species. Highlights that national/regional/sectoral plans should be taken account of when preparing the Plan and relevant list has been included. ([SD-C147-38, Environmental Protection Agency](#))
11. The expansion of scope in the replacement or updated SDCC Tree Management Policy 2015-2020 Living with Trees to include trees in hedgerows and woodlands in rural settings and other non-urban settings, to ensure more than just trees in urban street, urban open space and park settings are considered and managed. ([SD-C147-86, Four Districts Woodland Habitat Group](#))
12. Currently there is much overlap between zoning definitions that afford little no protection to nature such as Objective OS under which various land uses are permitted in principle and open for consideration. ([SD-C147-86, Four Districts Woodland Habitat Group](#))
13. Requests that South Dublin County Council's Tree Policy 2015-2020 include trees within hedgerows and woodlands in rural settings and other non-urban settings. ([SD-C147-99, Ne Graver](#))
14. Calls on SDCC to retain our green spaces and wildlife living there as a source of education for children and as a contributor to lowering our carbon footprint. ([SD-C147-83, Geraldine Kelly](#))
15. This submission deals with Natural Heritage and Biodiversity, stating that the council should be more pro-active in their approach to creating wild habitats in areas where there is poor access to wildlife. Rathcoole Woodland is identified as an example of a wild area which has a positive effect on the community at large. ([SD-C147-117, alistair mullan](#))
16. In relation to natural heritage & biodiversity, the submission states that the goals of the SDCC Biodiversity Plan should be promoted when assessing open space within new developments. ([SD-C147-122, Proinsias Fhlannchadha](#))
17. That the Council support the use of parklands for fruit and nut trees to benefit the local community. ([SD-C147-73, Knocklyon Network](#))
18. Increasing the angling amenities will reduce car journeys associated with having to leave the county for fishing trips. Biodiversity will significantly improve the quality of angling waters and increase in flora and fauna. ([SD-C147-205, Fergal Scully](#))

19. Natural Heritage & Biodiversity - Enrichment Opportunities the CDP should consider impact of urban forests in their role as part of the biodiversity, air cleansing and place identification. ([SD-C147-61, South Dublin Chamber](#))
20. Submission suggests expanding the pollinator program within the County. ([SD-C147-94, Elizabeth Hickey](#))
21. DoCHG is aware of the positive steps SDCC is taking to promote, conserve and enhance biodiversity within the county, including its management of extensive areas of grassland in its parks to maximize their value for wildlife and insects, in conformity with the 'All Ireland Pollinator Plan'; its adoption of effective policies to control invasive plant and animal species; and its publication of the Draft Biodiversity Action Plan for South Dublin County in July 2020. ([SD-C147-143, Dept. of Arts, Heritage and the Gaeltacht](#))
22. The submission supports the enhancement of biodiversity and would welcome the development of an Urban Apiary (Beekeeping). ([SD-C147-96, Public Participation Network](#))
23. Woodland: To protect and preserve the woodlands for future generations, incorporating into the GI Strategy, protecting the area acting as a natural floodplain. ([SD-C147-206, Patrick Healy](#))
24. Calls on SDCC to introduce a comprehensive and multifaceted tree planting program based around 'Stepping Stone forests' similar to Leaf Ireland's Choill Bheag\* program which uses planting and care of the forests to educate young children. Funding for such a scheme could come from sources such as the Government scheme for the creation of native woodland on public land by the DoAFM, lottery funding or corporate funding. ([SD-C147-103, Litter Mugs](#))
25. It considers the new plan identifies area of important heritage and formulate a strategy to inform and educate the public of these areas. ([SD-C147-106, Green Party Tallaght](#))
26. Submission suggests that the Biodiversity Action Plan should be used to inform the new County Development Plan. An updated Heritage Action Plan is required, covering investment and conservation and this plan should be published and accessible to all. ([SD-C147-106, Green Party Tallaght](#))
27. Small wild areas the size of tennis courts should be installed in the parks of estates around the county. They should also be clearly marked with explanatory signs. ([SD-C147-190, Eoin Ó Broin](#))
28. DoCHG welcomes the control work by SDCC in relation invasive species, and also that it is intended in the near future to extend this work to the large stands of Japanese knotweed occurring beside the Bohernabreena Reservoirs within the Glenasmole Valley SAC. Trapping of mink carried out on behalf of the Council over the last five years on the River Dodder has also been very successful in reducing the presence of this invasive animal species. It is recommended that these measures to control invasive species within the county should be continued and in the future extended to other species such as Himalayan balsam. ([SD-C147-143, Dept. of Arts, Heritage and the Gaeltacht](#))



29. Give every person in SDCC a tree to plant and provide places to plant them. ([SD-C147-141, Ross O'Mullane](#))
30. A biodiversity officer should be appointed within the Council.
- More support for the development of Green Corridors and Special Amenity Area Orders within the County.
  - The retention of public open space and parkland should be supported within this CDP.
  - Stop any further urban expansion throughout the County to protect agricultural and rural lands.
  - The use of Artificial grass and paving of front lawns should be discouraged.
  - A push for more agricultural and rural diversification i.e, specific focus on food growth to reduce our carbon footprint. ([SD-C147-169, South Dublin Conservation Society](#))
31. The preservation of Biodiversity (hedge, trees, ponds, bogs and other wet areas) should be incorporated into all facets of planning such as buildings, roads, parklands, flood management, playing pitches, and also industrial developments such as Grange Castle. ([SD-C147-113, John Stephens](#))
32. Requests that Land Use Zoning Categories be developed with objectives, actions with measurable outcomes to protect and enhance Natural Heritage and Biodiversity, and of Parks built into each and every Land Use Zone category. ([SD-C147-99, Ne Graver](#))

### **Green Infrastructure**

1. Most of the area of the Liffey valley is already a SAAO it would be a good idea to protect and develop the idea of a Liffey valley park all along the Liffey to Straffan in Co Kildare. This may include a trail along the Liffey from Dublin City into SDCC and would link up with the heritage amenities across the valley. It would also tick a lot of boxes for sustainable transport, place making and Biodiversity. ([SD-C147-44, Rebuild the Silver Bridge](#))
2. The protection and bolstering of habitats to support biodiversity and reduces flood risk, such as natural riparian strips. The development of Green Infrastructure can enhance biodiversity and safeguard land from future development. ([SD-C147-157, Yvonne Collins](#))
3. The plan should investigate the potential/feasibility of a Dodder-Blessington Greenway Link in conjunction with Wicklow County Council. ([SD-C147-6, Ross Killen](#))
4. Calls for the Rathcoole Woodlands, a valuable amenity for the people for Rathcoole, to be protected and preserved. Rathcoole Woodlands should be incorporated into Rathcoole Park and form part of a wider nature/walking trail from Saggart to Lugg Woods in the Green Infrastructure Strategy.

Calls for Rathcoole Woodlands to be designated as a Special Amenity Area. Calls for the recognition of Rathcoole Woodland as the first Native Woodland resulting from

re-wilded agriculture land. ([SD-C147-81, Gordon Place](#) [SD-C147-84, Julie Prenderville](#) [SD-C147-136, Niall Healy](#) [SD-C147-86, Four Districts Woodland Habitat Group](#))

5. The New Plan must have 1) Conservation and Protection of the Environment 2) Compliance with objectives of river basin management plans 3) Preservation of Landscape Character and must prevent habitat fragmentation. ([SD-C147-99, Ne Graver](#))
6. The Landscape Character, Natura 2000 sites, and Sites of Geological Interest should be supported at the County level by the Green Infrastructure Strategy, Open Space Strategy, and the Biodiversity Action Plan. The latter strategies and Action Plan need to address the problems identified in the SEA for the current County Development Plan. ([SD-C147-99, Ne Graver](#))
7. Requests that future development be interweaved into the landscape, thereby achieving a better balance in favour of Green Infrastructure/Nature to Urban landscape. ([SD-C147-99, Ne Graver](#))
8. There should be an increased amount of tree planting and biodiversity planting throughout the county. There should be more encouragement of Communities to plant and develop the many neglected corners or pieces of council lands. This will be a considerable saving for the Council. ([SD-C147-73, Knocklyon Network](#))
9. DoCHG suggests that the SDCC include in the CDP the objective that all hedgerows will be retained and subject to appropriate long-term management in any new development and where removal is absolutely necessary that the same length of compensatory hedgerow will be planted. A list of native species which should be used and which are appropriate to South Dublin County should be provided in the CDP.  
  
DoCHG welcomes the preparation of a Green Infrastructure Strategy for SDCC. ([SD-C147-143, Dept. of Arts, Heritage and the Gaeltacht](#))
10. Submission suggests adoption of creative zonings to allow for pocket forests/pocket parks, which provides connection to nature, carbon wash and have positive impacts for biodiversity. Provide ambitious tree replacement programmes for new developments. ([SD-C147-106, Green Party Tallaght](#))
11. Submission suggests that green Infrastructure is equally important as other forms of infrastructure. Preservation of green infrastructure is vital, creation of pocket parks, provision of water fountains in public spaces and parks and improve active travel infrastructure. ([SD-C147-106, Green Party Tallaght](#))
12. In relation to the green infrastructure strategy for the county, recommends that SDCC carry out a detailed evaluation of what the Council aspires to do, what has been attempted and what obstacles have been encountered or are expected. This way the new plan can build on previous experiences. Recommends that maps be included in the new Plan detailing the Green Infrastructure elements including making rivers and streams for visible and labelling areas of green as parks, golf courses, woodlands, etc. ([SD-C147-203, Betsy Omidvaran](#))
13. The submission advocates the protection of hedgerows, increase tree canopy coverage, connecting parks and open spaces via green corridors, support use of SUDS,

safeguard Natura 2000 sites and establishment of a tree nursery. ([SD-C147-106, Green Party Tallaght](#))

14. The Assembly welcomes the recognition given in the Issues paper to the role of Green Infrastructure (GI) and Ecosystem Services in supporting biodiversity and enhanced quality of life. The planning authority is directed in this regard to the Guiding Principles for Green Infrastructure (Section 7.7 refers) and for Sustainable Urban Drainage (SuDs) (Section 10.2 refers) set out respectively in Chapter 7 - Environment & Climate and Chapter 10 Infrastructure, which should be incorporated into the future CDP ([SD-C147-31, EMRA](#))
15. Ecological buffer zones should be identified throughout the lifetime of the plan.
  - Green infrastructure should be developed throughout the lifetime of the plan ensuring it is protected .
  - A proposed policy within the new CDP should relate to the protection of trees from development ([SD-C147-169, South Dublin Conservation Society](#))
16. The submission has highlighted Rathcoole Woodland has high value biodiversity, includes several diverse habitats and species. Rathcoole Woodland should be protected by a specific objection or action within the new plan and considers that it should be designated a Nature Reserve. ([SD-C147-160, Irish Wildlife Trust](#))
17. The Department of Culture, Heritage and the Gaeltacht requests that setback distances that support the attainment of high ecological status for water bodies the conservation of biodiversity, good ecosystem health and provide buffer zones for flood plains be included in the Draft Plan. ([SD-C147-143, Dept. of Arts, Heritage and the Gaeltacht](#))
18. IW encourages the inclusion of policies and objectives on the use of SUDS and Green Infrastructure. ([SD-C147-57, Niamh McDonald, Irish Water](#))

## **Environmental Reports**

1. DoCHG recommends that there is an overarching commitment in the CDP to undertake Appropriate Assessment (AA), EIA and Ecological Impact Assessment (EclA) as required and appropriate in relation to all downstream plans and projects. Where development projects arising from the CDP are not subject to Environmental Impact Assessment (EIA), assessment of the impacts to biodiversity will best be facilitated through the preparation of an Ecological Impact Assessment (EclA). ([SD-C147-143, Dept. of Arts, Heritage and the Gaeltacht](#))
2. The submission suggests that Environmental Impact Assessments should be more rigorous and far reaching across the development spectrum due to increased population and growth in order to ensure biodiversity loss is avoided. ([SD-C147-106, Green Party Tallaght](#))

3. DoCHG recommends that Appropriate Assessment of the draft CDP should include an assessment of the impacts of nitrogen deposition on Natura 2000 sites within the draft CDP's zone of influence. ([SD-C147-143, Dept. of Arts, Heritage and the Gaeltacht](#))
4. Contends that there is a significant issue missing from the Issues Consultation Booklet and that is how the identification of the issues has been influenced by the environmental assessment of the previous South Dublin County Development Plan 2016 - 2022. The determination of the success, or otherwise, of the policies of the previous plan in relation to the environmental impact on the surrounding environment of that Plan is a critical consideration in the formulation of the new plan. The neglect of this crucial feedback loop is detrimental to the production of a new plan and runs counter to the Irish Planning legislation and National Planning Guidelines. The absence of this information in the formulation of the new plan will lessen the likelihood of sustainable and environmentally positive outcomes in South Dublin. ([SD-C147-46, Dara Larkin](#))
5. The submission suggests, when preparing the new County Development Plan that consideration is given to 'SEA of Local Authority Land Use Plans- EPA Recommendations and Resources' and ensure its aligned with the NPF & RSES. ([SD-C147-38, Environmental Protection Agency](#))
6. Highlights the need for all underpinning strategies and action plans, such as the Green Infrastructure Strategy, Open Space Strategy, and the Biodiversity Action Plan, together with the next County Development Plan to address the problems identified in the SEA for the current County Development Plan and other material where threats and pressures to the natural environment are identified. ([SD-C147-86, Four Districts Woodland Habitat Group](#))
7. All the underpinning strategies and Action Plans and the next County Development Plan need to address the problems identified in the SEA for the current County Development Plan and other material where threats and pressures to the natural environment are identified. ([SD-C147-99, Ne Graver](#))
8. DoCHG would welcome a clear and specific monitoring plan to be included with the Strategic Environmental Report that would clearly outline how it is proposed to record the impacts of plan implementation on biodiversity, both in terms of biodiversity loss and biodiversity enhancement during the lifetime of the CDP. ([SD-C147-143, Manager Dau, Dept. of Arts, Heritage and the Gaeltacht](#))
9. Highlights the importance of trees and woodland in effective flood defence strategies. ([SD-C147-136, Niall Healy](#))
10. The Office advises against the use of information from the Office of Public Work's (OPW) Preliminary Flood Risk Assessment (PFRA) and arterial drainage benefitting lands maps to inform the SFRA. The planning authority will need to take account of OPW Flood Relief Schemes and undertake adequate flood risk assessment to determine if there is sufficient information to inform zoning decisions or if furthermore detailed analysis is required. ([SD-C147-144, Office of the Planning Regulator](#))
11. The OPW recommends that reference should be made in the CDP to the Guidelines on the Planning System and Flood Risk Management DHPLG/OPW, Nov 2009) and

associated Circulars and Technical Appendices to ensure that the key principles of flood risk management and sustainable planning are adopted.

It notes that the sequential approach to managing flood risk within the planning system should be used at the earliest stage in the CDP process and where risk exists, the precautionary approach then adopted.

The submission outlines the three stages of flood risk assessment.

Stage 1 Flood risk identification

Stage 2 Initial flood risk assessment

Stage 3 Detailed flood risk assessment

The OPW recommend that particular attention be paid to the following sections of the Floodrisk Guidelines; The Planning Principles, the Sequential Approach, Definitions of Appropriate Development, and The Plan making Justification Test. Where it is intended to zone or otherwise designate land in areas of moderate or high probability of flooding, the application of the Justification Test must be supported by detailed analysis.

The submission highlights specific Floodrisk Management Issues for Consideration. The RSES requires the implementation of regional Flood Risk Management Plans and Flood Maps prepared by the OPW, (CFRAMS) and (FRAMS). SDCC is requested to take full regard of the following FRAMS; Liffey and Dublin Bay, Baldonnell, Dublin City, Hazelhatch, Leixlip and Lucan to Chapelizoid.

SDCC should also have regard to the ongoing design, planning and implementation of flood relief schemes for the Poodle, the Camac and Dodder (Whitechurch Stream) rivers and ensure that the zoning and objectives of the Development Plan take account of these schemes.

It is noted that there is an obligation on Local Authorities to maintain any flood relief schemes completed under the Aerial Drainage Act including the Griffeen in Lucan. SDCC should consider including a register of key flood risk infrastructure in the County Development Plan. ([SD-C147-41, Rachel Woodward, Office of Public Works](#))



## Infrastructure and Utilities

### Infrastructure & Utilities General

1. The Chamber requests that the CDP ensures the development of enabling infrastructure to meet the needs of South Dublin's growing population. ([SD-C147-156, Dublin Chamber](#))
2. The submission states that climate action underpins every element of the future development of the county. Not only through renewable energy or waste management but also a shift is required to reduce commuting to provide attractive communities with amenities and thriving businesses. The concept of 'infrastructure first' planning so be at the fore to ensure infrastructure is in place ahead of mass development. ([SD-C147-106, Green Party Tallaght](#))
3. The submission strongly encourages infrastructure to be in place before dwellings and commercial buildings are completed. Existing community services should be audits and upgrades provided for as part of new developments and infill developments. ([SD-C147-106, Green Party Tallaght](#))
4. It is essential that national infrastructure providers support SDCC in the growth of sustainable centres like Newcastle and Rathcoole. ([SD-C147-74, Hugh Durkin](#))
5. The EMRA welcomes the Council's commitment to the provision of high-quality infrastructure and utilities in a plan led manner to ensure that there is adequate capacity to support future development. ([SD-C147-31, EMRA](#))
6. The submission recommends using the 'doughnut economics' model for public policy formation on infrastructure and utilities. ([SD-C147-106, Green Party Tallaght](#))
7. Highlights the need for investment in infrastructure and utilities such as electricity and water and waste water services to support the quantum of development planned in South Dublin. ([SD-C147-82, Declan Hanley](#))

### Waste Management

1. The submission calls for more litter bins and bottle bank recycling facilities in Citywest. ([SD-C147-32, Tracy Walsh](#))
2. The submission requests that all waste management related matters within the plan are discussed with the respective Regional Waste Management Planning Office. ([SD-C147-1, Corporate Support Unit, Department of Communications, Climate Action and Environment](#))
3. The submission calls for more centralised recycling centres and more local initiatives to help dispose of old heavy household items. Ballymount recycling centre can only be accessed by car which is a problem. ([SD-C147-25, Thomas Gallagher](#))
4. The submission encourages SDCC to seek an outright ban on single use plastics within the county. ([SD-C147-25, Thomas Gallagher](#))
5. There needs to be plans to reduce waste, plastic, all non-renewable products. Pressure needs to be put on all producers to reduce excess packaging, The contribution of Online stores to Repak needs to be legalised. ([SD-C147-73, Knocklyon Network](#))

6. The submission raises concerns about refuse and recycling services in South Dublin County which places considerable burdens on low-income households, this has led to the illicit dumping of waste that causes negative impacts on county. It is proposed that SDCC reassess its refuse/recycling policy. ([SD-C147-96, Public Participation Network](#))
7. Domestic waste collection should be controlled by SDCC. ([SD-C147-198, Carly Bailey](#))

### **Energy Networks, Renewable Energy & ICT**

1. The OPR commends the planning authority for its renewable energy initiatives, such as the Tallaght District Heating Project, and welcomes the proposals to establish similar in other areas. ([SD-C147-144, Office of the Planning Regulator](#))
2. The OPR directs the attention of the Planning Authority towards the promotion of Renewable Energy sources within the County and the requirement for the planning authority to indicate how the implementation of its development plan over its effective period will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resource (in megawatts). This will also need to reflect the specific characteristics and constraints of the area noting the conclusion in the current development plan regarding large scale wind energy infrastructure. ([SD-C147-144, Office of the Planning Regulator](#))
3. The Irish Wind Energy Association (IWEA) Highlights the role that wind energy can play in SDCC's aspirations to become as low a carbon county as possible by increasing energy efficiency and unlocking renewable energy potential. ([SD-C147-189, IWEA LTD](#))
4. The IWEA believes it is now necessary to provide for the spatial planning of wind energy and electricity transmission infrastructure on a regional basis, rather than at the Local Authority level as has been the case to-date. If a sufficient quantum of land to accommodate 15-20GW of new wind energy has to be identified to ensure 4.2GW is actually installed by 2030, this target should be divided out between the three Regional Assembly areas. Allocating a clear target of 6GW per region, requires the areas of least landscape sensitivity with the greatest landscape capacity to be identified to ensure an average of 1.4GW of new wind energy can actually be delivered in each region by 2030, which is the only way of ensuring the 4.2GW overall national target is achieved. ([SD-C147-189, IWEA LTD](#)) #
5. The EMRA draws the Council's attention to the Greater Dublin Areas transmission network as of EirGrid's Development Strategy. ([SD-C147-31, EMRA](#))
6. The Council is also directed to Section 10.3 'Energy' and the Guiding Principles to support the roll out of smart grids and future energy networks enabling the promotion of renewable energy sources, in line with RPO 10.19 ([SD-C147-31, EMRA](#))
7. The submission states that EirGrid require appropriate and robust policies and objectives for planning the national grid infrastructure, allowing for the delivery of benefit nationally, regionally and locally. The importance of the grid should be highlighted as a strategic issue within the CDP. ([SD-C147-115, EirGrid](#))



8. The ESB request that the Draft County Development Plan includes clear policies in relation to:

Renewable energy installations such as Leixlip Hydro Electric Station which are an integral part of our fight against climate change. There is a critical need for curtilage management and for the restriction of land uses, which might affect the ability for ESB consolidation and/or expansion as well as essential access, monitoring and maintenance.

Supporting the delivery and continuation of a secure and resilient supply of energy that optimises the use of the renewable energy resources of the County to address climate change, support job creation and the move to a competitive low carbon Green Economy, while also protecting the environment and amenities of the county.

Safeguarding existing strategic energy corridors from encroachment by other developments that could compromise the delivery of energy networks.

Protecting the County's future capacity for the development of electricity Transmission and Distribution infrastructure.

Facilitating expansion and improvement in telecommunications infrastructure and to help position the county to attract intellectual and physical capital and to act as a mechanism to improve virtual connectivity.

Promoting, encouraging and facilitating the use of sustainable modes and patterns of transport including electric vehicles, including Parking Standards that will set minimum levels of parking provision for EVs. ([SD-C147-185, Colm Cummins, Electricity Supply Board](#) )

9. The submission recommends that all wires underground and install the fastest broadband. ([SD-C147-141, Ross O'Mullane](#))
10. The Submission suggests pylons and cables should be underground and telecommunication masts should be located sensitively. ([SD-C147-198, Carly Bailey](#))
11. The submission includes a recommendation in relation to Infrastructure & Environmental Quality (IE) Policy 4 Information and Communications Technology (ICT) and associated provisions in the existing Plan. ([SD-C147-222, Keep Ireland Open](#))

## **Water Supply & Wastewater Drainage**

1. The submission highlights the following regarding Public Services: drinking water standard and provision, air condition standards, voting and polling stations, postal voting. ([SD-C147-207, Monica McGill](#))
2. The EMRA recommends early engagement with the relevant agencies, including Irish Water (IW) to ensure that water and air quality, noise and waste management accord with relevant EU and national legislation. ([SD-C147-31, EMRA](#))
3. The EMRA recommends that the Council take into account the need to identify flood risks and ensure the resilience of critical infrastructure, as set out in RPO 7.43 of the RSES. The planning authority shall also note the provisions of the National Mitigation

Plan 2017 and the National Adaptation Framework 2018 in this regard. ([SD-C147-31, EMRA](#))

4. There is an issue in Rathcoole with over capacity of sewage which will effect the building of houses. ([SD-C147-206, Patrick Healy](#))
5. The submission notes an increased pressure on wastewater infrastructure due to increase in residential developments. SDCC must ensure that wastewater capacity keeps pace with increased demand. ([SD-C147-106, Green Party Tallaght](#))
6. The submission expressed the need to update our Victorian water solution. ([SD-C147-141, Ross O'Mullane](#))
7. Irish Water need to clear drains in public parks. ([SD-C147-198, Carly Bailey](#))

### **Surface Water, ground water and flood risk**

1. The OPW express the need to ensure access requirements are preserved for maintenance of Arterial Drainage Schemes, Drainage Districts, protection of Agricultural Embankments and avoid flood risks and seek opportunities for natural water retention measures such as SUDS. ([SD-C147-41, Office of Public Works](#))
2. The submission includes a recommendation in relation to Infrastructure & Environmental Quality (IE) Policy 2 Surface Water & Groundwater and associated provisions in the existing Plan. ([SD-C147-222, Keep Ireland Open](#))
3. Irish Water need to clear drains in public parks. ([SD-C147-198, Carly Bailey](#))
4. The submission calls for the proper river management of the Camac river and its ponds in Clondalkin including restoring the filter ponds and cleaning up the river. ([SD-C147-25, Thomas Gallagher](#))
5. The submission calls for SDCC to improve water quality of rivers and streams within the county. ([SD-C147-197, South Dublin Environmental Network](#))
6. The submission suggests that a reservoir to be built near the source of the Camac to maintain water flow throughout the summer. ([SD-C147-49, Niall Charleton](#))
7. The DoAHG recommends that the Inland Fisheries Ireland Document 'Planning for Watercourses in the Urban Environment' should be consulted in relation to formulating objectives and policies for riparian zones in the new plan. ([SD-C147-143, Dept. of Arts, Heritage and the Gaeltacht](#))
8. DoAHG recommends that specific measures to discourage culverting of water courses and encourage the reopening of previously culverted water courses should also be considered when drafting the new CDP. Where culverting is unavoidable, the Department recommends that, where possible, ecologically friendly box culverts should be used in preference to piped culverts. Realignment of water courses should incorporate stream enhancement measures, as outlined in OPW Environmental Guidance. The CDP should also promote the removal of historic infilling along watercourses. ([SD-C147-143, Dept. of Arts, Heritage and the Gaeltacht](#))

## Miscellaneous (including Zoning Related Submissions)

### Outside the Scope of the Plan

1. Calls for the Dublin Mountains (Hell Fire Club, Masseys Wood) planning permission to be stopped to allow for public participation. ([SD-C147-197, South Dublin Environmental Network](#))
2. Council Enforcement has not been making sure Developers and builders are complying with the conditions of their planning. ([SD-C147-73, Knocklyon Network](#))
3. Recommends tax write offs. ([SD-C147-141, Ross O'Mullane](#))
4. The Disability Act 2005 places significant obligations on public bodies to make their buildings and services accessible to persons with disabilities and in particular, that they comply with Part M of the building regulations, and any amendments within 10 years of those amendments being commenced being 2022. Due to potential funding restraints, NDA suggest that public buildings that have the greatest customer footfall would be prioritised for auditing and improvement works.

Assisted Decision-Making (Capacity) Act 2015 will have a bearing on the housing application process and the decision involved. When the Act is operational, it will be up to local authority housing officers to be as supportive as they can to applicants who may have capacity issues with the Housing Agency being very proactive in engaging with the NDA about the development of guidance for local authority housing officials

Procurement draft templates which each local authority are required to use, do not refer to the requirement for the inclusion of accessibility as a criteria within this process. Section 27 of the Disability Act 2005, layout and format of tender briefs must not be generic template documents and that the Council should take the initiative in incorporating accessibility/universal design across all its tendering processes. ([SD-C147-174, National Disability Authority](#))

5. The 'SDCC draft masterplan' also has serious concerns for us as residents of Beechwood Lawns, Coolamber Drive, Coolamber Road and Maple Grove (BCM) area as it proposes a large car park and library on the BCM green area known as the 'three corner field'. This area is designated as a green space for the BCM estates which were built some 50 years ago. An alternate unused amenity area was proposed for car parking by BCM some years ago and continues to remain idle. ([SD-C147-206, Patrick Healy](#))
6. Submission relates to Ballyfermot which is not within South Dublin County Council's administrative area. ([SD-C147-22, Constantin Roman](#))

### Development Plan Interpretation and Clarity

1. Requests that Schedule 5: Definition of Use Classes & Zoning Matrix Table, 'Aparthotels' of the current Development Plan 2016-2022 be amended to include: 'for use by tourists and visitors and excludes residential use and student accommodation'. ([SD-C147-105, James McNerney Planning Consultant](#))
2. Requests that the current "Open Space" zoning status of the lands be amended to include all or some of the following uses: Camp Site, Car Park, Childcare Facilities, Conference Centre, Education, Health Centre, Housing for Older People, Office, Outdoor

Entertainment Park, Residential, Restaurant/Cafe, Retirement Home and Stadium. ([SD-C147-111, Finnstown Castle Hotel](#))

3. The references to 'Liffey Valley Shopping Centre' in the Development Plan should be replaced with more general reference to 'Liffey Valley'. ([SD-C147-142, BMA PLANNING](#))

### **Development Plan Procedure and Clarity**

1. Recommendation in relation to the format and layout of the existing Plan and specific headings and sub-headings used. Recommendation to consider following the format of the Waterford County Development Plan 2011. Concerns regarding the use of 'seek to' and 'contribute to' in development plans generally. The existing Plan fails to comply with the Planning and Development Act, the plans of adjoining counties, the Heritage Act 1995 and the National Heritage Plan. ([SD-C147-222, Keep Ireland Open](#))
2. Current CDP policies & objectives & actions, should be measurable, should be ongoing & updated over the lifetime of the plan. ([SD-C147-87, Deirdre Tierney](#))
3. Submission raises concerns regarding the timeframe of the entire process in that considerable time may have elapsed from when the process of arriving at a County Development Plan was initiated to the time land zoning is enacted. Both the communities that existed at the time and the landscape/natural environment context may have entirely changed in the intervening time. ([SD-C147-87, Deirdre Tierney](#))
4. Submission raises concerns regarding the difference in land-use zoning and what each use class means, it calls for greater definitions of these and more emphasis on 'achieving' protection rather than 'seeking' protection. ([SD-C147-87, Deirdre Tierney](#))
5. Submission raises concerns that zoning of Naas Rd/Ballymount area was changed through variation whilst it should have been done through the County Development Plan process to allow engagement with stakeholders. ([SD-C147-97, Glen Jenkins, BOC Gases](#))
6. The submission asks what the relationship is between the new Development Plan and the Climate Action Plan and Heritage Plan. ([SD-C147-106, Liam Sinclair, Green Party Tallaght](#))
7. There is no guidance under the current development plan on what or how 'approved area plans' are formulated, and it is suggested that it is replaced with 'masterplans' to avoid certain zones becoming undeveloped / sterilised. ([SD-C147-65, Gareth Stanley](#))
8. Request the new Written Statement is clear when defining 'genuine need' for rural housing and the reasons for refusal on this basis are transparent and understandable so that it can be adequately challenged by the applicants. ([SD-C147-67, James McNerney Planning Consultant](#))
9. Submission requests that the new Plan is written in clear plain English, as 1 in 6 Irish adults have literacy difficulties and that SDCC uses the 'Simply Put' approach for the next 2 stages of public consultation. ([SD-C147-96, Public Participation Network](#))

## **Zoning Related Submissions**

1. To re-zone 4.4 Hectares of Agriculture zoned land south of Newcastle settlement to Residential. ([SD-C147-20, Sheila & John Trant](#))
2. Request for changing the zoning of lands to the south of Tallaght for Objective RU to Objective RES-N. ([SD-C147-23, Hilda Childs](#))
3. Request to change the zoning objective of lands in Rathcoole from Objective RU to RES-N. ([SD-C147-21, Jim Brown](#))
4. Request for change to zoning objective of lands at Newlands Cross, Naas Road from Objective EE and RES to REGEN. ([SD-C147-26, Prismline Ltd, Prismline Ltd](#))
5. A re-zoning request to consider lands at Aylmer Road, Newcastle for enterprise and employment uses. ([SD-C147-104, Gibbons Associares, Gibbons& Associates](#))
6. Request to change the zoning objective of lands in Corkagh, Clondalkin from Objective OS (open space) to EE (Enterprise and Employment). ([SD-C147-140, Alan Crawford, BMA PLANNING](#))
7. Request for existing lands to the east of Finnstown Castle Hotel (7 acres) which are zoned as "Open Space" be amended to facilitate the expansion of Finnstown Hotel Facility and that a mixed use zoning be applied to the lands with a proviso that a masterplan for the lands be agreed with SDCC prior to any application lodged. ([SD-C147-111, Finnstown Castle Hotel Finnstown Castle Hotel, Finnstown Castle Hotel](#))
8. This submission relates to lands at Boherboy, Saggart, Co. Dublin to be rezoned for specific older persons housings. Map attached with both sites ([SD-C147-114, Finnstown Castle Hotel Finnstown Castle Hotel, Finnstown Castle Hotel](#)).
9. Requests that SDCC carry out an analysis and audit of key settlement development areas throughout the county, such as for example Adamstown and sequentially consider the incorporation of further lands in close proximity to Adamstown and to recalibrate the associated planning scheme and its vision and evidence-led strategy accordingly. [Lands in Quintain Ireland Ltd ownership] [Engineering Report, planning report detailing planning rationale supporting the rezoning of lands] ([SD-C147-159, Quintain Developments Ireland Limited](#))
10. Land use re-zoning request for lands at Killinarden for residential land use, i.e. Objective RES-N 'To provide for new residential communities in accordance with approved area plans' as part of the new South Dublin Development Plan 2022-2028. ([SD-C147-155, Kelland Homes Ltd, Armstrong Fenton Associates](#))
11. This submission relates to lands located at the intersection of the Watery Lane and Nangor Road and relate to the re-zoning of the site to Residential. The site benefits from being located beside current housing developments and close to infrastructure which already exists. ([SD-C147-218, Hilary Boylan](#))

12. Zoning request for lands comprising 3.23 Hectares (8 acres) located at Newlands between Newlands Cross and The Red Cow Roundabout approximately 4km southwest of Dublin City Centre be re-zoned to allow renewal of the area ([SD-C147-154, Paula Shannon, Simon Clear & Associates](#))
13. Rezoning request for 'a modest section of land from OS (open space) to RES at Clonard & Clonbrone, Eskill Hill, Lucan. ([SD-C147-132, Eamon Brennan](#))
14. The landowners request rezoning of their land at Newcastle from RU (rural) to VC 'Village Centre' which would allow for the development of a supermarket/Convenience store on site. ([SD-C147-123, John and Frank Gargan](#))
15. The second submission relates to the same landowners as submission No. 123 but relates to a different area of land located between Newcastle and Rathcoole. Request a change of zoning from rural RU to employment EE, for future employment opportunities. ([SD-C147-123, John and Frank Gargan](#))
16. Request that lands on Peamount Road in Newcastle be zoned for development in the new Plan. ([SD-C147-223, Michael & Geraldine Carr](#))
17. Requests that lands on the Peamount Road in Newcastle be zoned for residential or industrial use in the new Plan. ([SD-C147-225, Paul Sweeney](#))
18. This submission deals with lands owned by the Citywest hotel. The submit that the Citywest Hotel lands can provide for new residential communities in Fortunestown/Citywest. The submission looks for land to be rezoned at the citywest complex from employment to residential use, as it offers a unique mix of many facilities. ([SD-C147-118, Stephen barrett, Tom Phillips + Associates](#))
19. This submission identifies the agricultural lands adjacent and to the west of Adamstown, at Aderrig and Tobermaclugg, which are situated on the Dublin –Kildare rail line, as being a highly suitable location to accommodate future population growth and housing needs of the County. Such an approach has regard to National Planning Policy and the RSES which promote the integration of land use and public transportation, consolidation of growth within the metropolitan area of the GDA, adherence to the sequential approach to land use zoning and specifically identify the South-West Corridor, along the Hazelhatch / Celbridge to Dublin line, as a suitable location to cater for future growth within the Metropolitan Area. ([SD-C147-137, John McGreevy, Hugh McGreevy & Sons](#))
20. Zoning consideration request for lands at Liffey Valley Shopping Centre to deliver future residentially-led mixed use development that can accommodate a projected population, housing growth and associated demand for services for South Dublin to be delivered over the new Development Plan period. Request that residential development and an

expansion of appropriate uses such as office, medical/healthcare and education at Liffey Valley in the new Development Plan for 2022-2028. A full rationale for the zoning request submitted with this proposal. ([SD-C147-109, Muirenn Duffy](#))

21. The attached submission relates to 6.01 Hectares of land zoned agriculture in the Newcastle area requesting the consideration of such lands for residential development. ([SD-C147-221, Michael Bennett](#))
22. Submission relates to re-zoning of rural land to facilitate development north of Newcastle Village. ([SD-C147-216, Declan & Annette Hughes](#))
23. Request to change lands, comprising Tassagart House and environs, zoned open space to residential which are 200m from Saggart Luas Line. ([SD-C147-182, Finnstown Castle Hotel Finnstown Castle Hotel, Finnstown Castle Hotel](#))
24. The attached submission relates to 25 acres of land zoned Open Space in Finnstown, Lucan requesting the consideration of such lands for Residential development. ([SD-C147-153, Maplewood Residential, Armstrong Fenton Associates](#))
25. The submission attached relates to Blackchurch Business Park Rathcoole currently zoned 'RU', requesting the consideration to zone these lands as Enterprise & Employment 'EE' and provide a Specific Local Objective. ([SD-C147-151, Alan Crawford, BMA PLANNING](#))
26. Request for rezoning of Glenside Villas in Palmerstown. from commercial to residential in Palmerstown, in order to safeguard from future commercial development. ([SD-C147-124, Annette O Connor](#))
27. Request that the zoning of lands located at Fonthill Retail Park, and in particular in the southern portion of the Fonthill Retail Park, be reviewed to facilitate a neighbourhood retail centre, including mixed uses (residential) with appropriate policies and specific objectives. The southern area of Fonthill Retail Park should be included as a neighbourhood centre in the retail hierarchy of the new County Development Plan. That locations such as Fonthill Retail Park should accommodate an appropriate mix of uses as espoused within the 2018 Building Height guidelines. ([SD-C147-152, John Spain Associates on behalf of Fonthill Commercial Developments Ltd](#))
28. Rezoning request from 'EE' to 'RES' ([SD-C147-125, Ray and Eleanor McBennett](#))





## Summary of submissions relating to Neighbourhood Areas

### Citywest/Saggart/Rathcoole/Newcastle Neighbourhood Area

#### Built Environment and Placemaking

1. Potential to be an exemplar for urban-rural transitional building design including infrastructure, rather than a dormitory suburb in the Greater Dublin region. ([SD-C147-16, Alan Fairman, Rathcoole Community Council](#))
2. The Market Square in Newcastle village would be better laid out for a market or communal green space rather than as a car park. There is too much car dependency in housing developments. ([SD-C147-113, John Stephens](#))
3. Requests that Saggart be designated as an Architectural conservation area and requests that the village be protected. ([SD-C147-212, Audrey Crone](#))
4. Requests that the vacant lot in the centre of Saggart village be converted into a village green. ([SD-C147-212, Audrey Crone](#))
5. Requests that high rise development is not considered in Saggart. A certain density can be achieved without high rise of six stories which are overcrowded and block light a key need for mental and physical health. If apartments are necessary, they must be suitable for families and functional ([SD-C147-212, Audrey Crone](#))
6. The N7/M7 motorway provides for a separation that should have Newcastle excluded for the Citywest/Saggart/Rathcoole/Newcastle Neighbourhood and to become a Neighbourhood on its own right. ([SD-C147-80, James McInerney, James McInerney Planning Consultant](#))
7. Highlights the need for all new developments in Saggart, Rathcoole and Newcastle to recognise, respect, protect, maintain and enhance the existing historic built environment and that green belts should be introduced and preserved so that these individual former villages retain their identity within rural surroundings. ([SD-C147-80, James McInerney, James McInerney Planning Consultant](#))
8. Newcastle presently suffers from a lack of facilities and relies heavily on one filling station/shop and small corner shop and is without a basic play area for young children. The placemaking envisaged by the Newcastle Local Area Plan has not taken place and more emphasis needs to be incorporated into the new Draft Development Plan for the provision of recreational and community facilities in tandem with new housing. ([SD-C147-80, James McInerney, James McInerney Planning Consultant](#))
9. Calls for Specific Local Objectives for Newcastle including in relation to building heights, provision of commercial, recreational and community services and the establishment of a Historic/Cultural quarter around the existing medieval monuments and protected structures located at the western end of Newcastle Village. ([SD-C147-80, James McInerney, James McInerney Planning Consultant](#))
10. Requests that all new development in Newcastle retain a village character and development should be directed into its centre in a strictly controlled manner and prohibit development around its edges that does not accord with the zoning

objectives for the area. ([SD-C147-105, James McNerney, James McNerney Planning Consultant](#))

11. Requests that Newcastle's medieval character be protected by limiting further development inappropriate to the area and establishing a Historic/Cultural quarter around the existing medieval monuments and protected structures located at the western end of Newcastle Village. ([SD-C147-105, James McNerney, James McNerney Planning Consultant](#))
12. Placemaking requires an active communication plan with relevant stakeholders and the residents of Citywest in order facilitate 'community planning'. ([SD-C147-90, Marie Petiet](#))
13. LC Zoning is beneficial to the protection of Saggart Village, however, this must be a consideration as part of the planning assessment, either as a normal application or through the SHD process in the areas immediately surrounding Saggart Village and must assess the impact of traffic, and provision of Community Facilities (Medical and Childcare) ([SD-C147-176, Lynn Tierney, Saggart Village Residents' Association](#))
14. Requests that any future development of both residential and/or commercial within the boundaries of the Newcastle Local Area Plan should not be higher than two storeys, save as for landmark buildings and requests that the height of new buildings proposed on 'RU' Zoned lands in proximity to Newcastle be gradual with no significant marked increase in building height in close proximity to existing housing. ([SD-C147-105, James McNerney, James McNerney Planning Consultant](#))

### **Climate Action and Energy**

1. Requests that the Rathcoole Woodlands be incorporated into the SDCC Development Climate Change Action Plan, as a Nature-Based Solution to reduce green house gases, provide flood resilience and provide clean air. ([SD-C147-127, Sally Graver](#))

### **Community Services**

1. Citywest needs Community Centres, a Garda Station, a Library and more Secondary Schools. ([SD-C147-12, venkata subhash babu medisetty](#) [SD-C147-19, Joanne Fitzpatrick](#))
2. Need for a full time garda station in Citywest. ([SD-C147-10, Karen Keatinge](#))
3. Citywest needs a public library and community centres which cater for existing and future expanding populations which are accessible for children in the area. ([SD-C147-10, Karen Keatinge](#))
4. Need for Community Facilities (Schools, Community Centre, medical, local playing pitches and dental) which takes into consideration the existing and proposed populations. Increased levels of anti-social behaviour due to little or no Garda presence in the area. ([SD-C147-13, Lema Lo](#))

5. Due to increase in anti-social behaviour a need for a new Garda Station in Saggart/Rathcoole area. ([SD-C147-32, Tracy Walsh](#))
6. Concerned that community facilities have not been constructed alongside the increase in number of high rise, high density apartments in Citywest. There is a need for an additional secondary school, library community centre and sports club. ([SD-C147-32, Tracy Walsh](#))
7. Concerned that more policing is required due to anti-social behaviour in Corbally area of Citywest, especially in light of the growing population. The existing Tallaght Garda Station is under resourced. ([SD-C147-42, Deirdre McMullan McMullan](#))
8. Citywest is lacking in community facilities. ([SD-C147-98, Kar Kin Lim](#))
9. Requests that the increased development of Newcastle is stopped until infrastructure including roads, walking routes and community parks are put in place for the growing population. ([SD-C147-54, Fergal Britton, ReNewcastle Community Group](#))
10. Newcastle requires a space for older kids, teens, adults and the elderly to enjoy. ([SD-C147-54, Fergal Britton, ReNewcastle Community Group](#))
11. Newcastle has no community areas to hold community events. The Market Square (leading off the Community Centre) was given over to car parking. ([SD-C147-54, Fergal Britton, ReNewcastle Community Group](#))
12. Newcastle has experienced a huge population increase, a new primary school and a post-primary school is now required. ([SD-C147-54, Fergal Britton, ReNewcastle Community Group](#))
13. The submissions highlights a need for additional community infrastructure within the Citywest/Saggart/Rathcoole and Newcastle Areas with particular reference to a Community Centre, Library and Schools. ([SD-C147-3, Alison Sheppard](#))
14. To consider Community Facilities in the local Citywest/Saggart area following recent growth of family dwellings. The provision of good community services is needed to build a community, particularly youth facilities and parks. ([SD-C147-71, Kemi Obi](#))
15. There is a lack of community facilities in Saggart which is resulting in anti-social behaviour. Services should be first provided, such as secondary schools before any future development takes place. There is a lack of large open space areas. Open space areas should be available throughout the community to allow for community events. ([SD-C147-196, Paul Kelly](#))
16. Need for more Community Services (Secondary Schools, Library, Medical, sporting grounds and associated facilities) ([SD-C147-100, Olive O'Malley](#))
17. Engage with local schools to gauge requirements for facilities in their community with suggested community services to include: Enhancing Carraigmore Park, more basketball courts, a teenage playground; bmx/scooter ramps, a running gravel path in Rathcoole Park as seen in Dodder Valley Park for Bros Pearse AC. ([SD-C147-70, Rachel O'Callaghan](#))
18. Extra Garda resources is a must to ensure the current anti-social behaviour does not continue. ([SD-C147-70, Rachel O'Callaghan](#))

19. New and additional Garda resources are required within this neighbourhood area. ([SD-C147-8, Amanda Higgins](#))
20. It is considered that the Neighbourhood Area of Rathcoole/Saggart is currently deficient in the provision of community services and infrastructure ([SD-C147-11, Asa holmstrom holmstrom](#))
21. Safe outdoor recreational facilities are required including a cycle link to the greenway from Newcastle. More community facilities are needed in Newcastle, the existing community centre should be expanded to increase the community offering. ([SD-C147-209, jon norton](#))
22. The level of development within the Citywest area needs to be complemented by sufficient community services and facilities. ([SD-C147-56, Paul Murphy](#))
23. The growth in population of towns like Newcastle and Rathcoole must be matched by the provision of new community services. This will ensure that they are self-sustaining and liveable communities. ([SD-C147-74, Hugh Durkin](#))
24. Saggart requires greater community facilities. The 14.2ha park is not large enough for the population. The park is used for other purposes, such as dog walking, and not solely for football pitches. Requests that there is a proposal in the development plan to expand the park at Rathcoole from a neighbourhood park to a regional park with amenities to match, this could be achieved by incorporating the woodland area and also the zoned lands designated 'To preserve and provide for open space and recreational amenities'. ([SD-C147-212, Audrey Crone](#))
25. Requests that the Draft Development Plan provide for recreational and community facilities in tandem with new housing in Newcastle. ([SD-C147-105, James McNerney, James McNerney Planning Consultant](#))
26. Requests the establishment of a secondary school in Newcastle. ([SD-C147-105, James McNerney, James McNerney Planning Consultant](#))
27. The Medical Centre is oversubscribed due to the population increase and there is a lack of dentists in the Citywest area. Due to the population age profile within Citywest area, there will be a need for a Day Care Centre for the elderly in the medium term. ([SD-C147-90, Marie Petiet](#))
28. Citywest area requires a library and community centre, with associated sports facilities, pitches, running/cycle track. Due to the growing population and increase in crime and anti-social behaviour, a Garda Station is required in close proximity of the shopping centre. Carrigmore Park is too small for the population it serves and requires maintenance of lighting, benches and bins. ([SD-C147-90, Marie Petiet](#))
29. Submission suggests an additional secondary school, in addition to that already planned is required in the short term as 27% of population is between 0-14yrs. ([SD-C147-90, Marie Petiet](#))
30. Raises concerns about the environmental impact of housing development and the loss of green spaces in the Citywest area, especially at the shopping centre. ([SD-C147-90, Marie Petiet](#))

31. A need for increased educational capacity in particular secondary schools. ([SD-C147-176, Lynn Tierney, Saggart Village Residents' Association](#))
32. We are thankful therefore of South Dublin County Council's investment in the Saggart Community Centre due to open in December 2021. ([SD-C147-176, Lynn Tierney, Saggart Village Residents' Association](#))
33. Highlights the serious lack of amenities and green space in Newcastle and the need for facilities such as park, public playing pitches, community facilities, a scout hall, preservation of our historic sites and green spaces, a supermarket, basketball courts and Wi-Fi hotspots for young people, and if Rathcoole Garda station is to properly serve the Communities of Newcastle, Saggart, and Rathcoole it needs to be properly manned and open every day. Concerns that building such a volume of housing in a small village such as Newcastle without improving amenities has the potential to result in social problems. New primary school in Newcastle is not sufficient for the growing population. A secondary school will be needed soon. Play spaces should be provided by SDCC and not be developer-led. ([SD-C147-195, Mairéad O'Connor](#))
34. The submission raised concerns that there is lack of secondary schools in Citywest/Saggart area. ([SD-C147-168, Lynn Tierney, Saggart Village Residents' Association](#))
35. Submission welcomes the current investment in the Saggart Community Centre which is due to open in December 2021. ([SD-C147-168, Lynn Tierney, Saggart Village Residents' Association](#))
36. There is a lack of GP clinics in the Saggart area and many are closed to new patients as they are at capacity. ([SD-C147-168, Lynn Tierney, Saggart Village Residents' Association](#))

### **Economic Development and Employment**

1. There is a proliferation of fast-food outlets in Citywest. ([SD-C147-32, Tracy Walsh](#))
2. To preserve community plans to use Rathcoole's local attraction: Slade Valley ,Slieve Thoul and Lugg (Saggart Hills) walks and require the preservation of a Greenway between Rathcoole Park and the beginning of the Slade Valley walk ([SD-C147-16, Alan Fairman, Rathcoole Community Council](#))
3. To harness significant funds to initiate visitor focused projects including: the upgrading of the old courthouse building to an exhibition centre with cafeteria and Tourist information desk. ([SD-C147-16, Alan Fairman, Rathcoole Community Council](#))
4. Proposes that SDCC take the area around SwiftBrook Mill in charge and add this area to the proposed Greenway Slade Castle to Brittas part of the 2015-2020 tourist strategy and parklands and create a feature similar to that of the Round Tower in Clondalkin by creating a historical and community hub with museum. This will be an amenity for walkers and students and contribute to GI and wildlife. ([SD-C147-48, Sue Dorgan, Millrace Residents association \(MRA\)](#))

5. The development plan should encourage and support opportunities and requirements for office space and business hubs to sustain and expand the economic health of smaller towns like Newcastle and Rathcoole. Greenogue Business Park provides valuable employment to residents of Newcastle and surrounding areas and its growth should not be constrained by a lack of zoned sites due to the abundance of adjoining greenfield land. ([SD-C147-74, Hugh Durkin](#))
6. Citywest Shopping Centre is small with an anchor store but little other retail offering except for a growing number of takeaways and its associated littering and loitering. ([SD-C147-90, Marie Petiet](#))
7. The submission suggests that the Old paper Mill be preserved and promoted as a site of historical significance and interest to both residents and visitors, with the potential for a visitor's site with café / shop amenities. ([SD-C147-168, Lynn Tierney, Saggart Village Residents' Association](#))

### **Infrastructure and Utilities**

1. More litter bins and bottle bank recycling facilities in Citywest. ([SD-C147-32, Tracy Walsh](#))
2. Recently built housing estates in Rathcoole have put enormous pressure on roads and infrastructure and are prejudicing the future. ([SD-C147-16, Alan Fairman, Rathcoole Community Council](#))
3. It is essential that national infrastructure providers support SDCC in the growth of sustainable centres like Newcastle and Rathcoole. ([SD-C147-74, Hugh Durkin](#))
4. There is an issue in Rathcoole with over capacity of sewage which will effect the building of houses. ([SD-C147-206, Patrick Healy](#))
5. Additional Public lighting is needed along Garter's Lane and Castle Road ([SD-C147-176, Lynn Tierney, Saggart Village Residents' Association](#))
6. The submission seeks the insertion of a Specific Local Objectives in the new Draft Development Plan to protect and preserve the fresh water source to the ornamental pond at the rear of The Old Glebe. The SLO to read as follows: "To secure the preservation and protection of the ornamental pond at the rear of The Old Glebe, Main Street, Newcastle, Co. Dublin a protected structure by the separation of the fresh water source from the existing surface water disposal system." ([SD-C147-50, James McInerney, James McInerney Planning Consultant](#))

### **Natural Heritage and Biodiversity**

1. Rathcoole woodland should remain a woodland. To develop on it would be a loss to the community. ([SD-C147-66, Jennifer Hannon](#) [SD-C147-91, John O'Leary, Beechwood Lawns Coolamber and Maple Residents Association](#))
2. Rathcoole Woodland should be preserved, form part of the Green Infrastructure Strategy and be designated with protections. ([SD-C147-93, Susan Healy](#))

3. Rathcoole Park should be protected as it is a unique habitat and a great amenity for the local community. ([SD-C147-196, Paul Kelly](#))
4. Rathcoole Woodlands is a valuable amenity and should be recognised as being the first Native Woodland resulting from re-wilded agriculture land and should be protected and preserved for present and future generations by designating it as a Nature Reserve, obtaining a Special Amenity Area Order and if appropriate to nominate it as a candidate Special Area of Conservation by bringing it to the attention of NPWS or as a Natural Heritage Area. Should link with minimal management into Rathcoole Park and should be incorporated into the Green Infrastructure Strategy as part of a wider nature/walking trail from Saggart to Lugg Woods. ([SD-C147-72, Fiadh Ní Dhonnchadha](#))
5. Concerns are raised seeking the protection of all native woodlands in the county and Rathcoole Woodlands should be given designations for its protection and should form part of the Green Infrastructure Strategy for the area. ([SD-C147-197, christine Barretto, South Dublin Environmental Network](#))
6. The Burgage plots in Newcastle are not being respected within all developments, as per the existing Local Area Plan. ([SD-C147-209, jon norton](#))
7. The Rathcoole Woodlands is a valuable amenity to the people of Rathcoole and Saggart and must be preserved as it helps protect biodiversity and protect us from climate change. Actions to be taken should be to Protect and preserve Rathcoole Woodland for present and future generations that may come to live here. To designate it as a Nature Reserve. To Obtain a Special Amenity Area Order and if appropriate nominate it as candidate Special Area of Conservation by bringing it the attention of the NPWS or as an area of Natural Heritage. To incorporate Rathcoole woodlands as is with minimal management into Rathcoole Park. To Incorporate all of Rathcoole Woodlands as is, into the Green Infrastructure Strategy as part of wider nature/walking trail from Saggart to Lugg Woods. ([SD-C147-183, AIDAN doyle](#))
8. Rathcoole woodlands corresponds to the 'Priority Annex I habitat to 91E0 Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior*' as listed under the EU Habitats Directive with implications for developments within and adjacent to the woodland. ([SD-C147-43, Orla Daly](#))
9. Rathcoole Woodlands should be protected as a valuable amenity for the people of Saggart and Rathcoole. ([SD-C147-212, Audrey Crone](#))
10. Consideration must be taken into account for water run-off, there is extreme flooding in times of rain in Saggart village since the development of Mill race and other estates. ([SD-C147-212, Audrey Crone](#))
11. Requests that SDCC identify, protect and preserve the remaining sections of unculverted first order streams in the upper catchments of the Griffeen and Camac in the vicinity of Rathcoole in their natural state as ecological corridors, for the retention of sediments, attenuation of pollutants and flood control function by retaining and enhancing the associated riparian/bankside margins and incorporating into the green infrastructure. This is particularly important for Rathcoole Woodlands and Rathcoole Park. ([SD-C147-86, Eimear Healy, Four Districts Woodland Habitat Group](#))



12. Requests that SDCC identify, protect and preserve the best examples of Burgage fields in Rathcoole and of those that remain in Newcastle. Burgage hedgerows are identified as an important cultural heritage feature which should be protected where possible. ([SD-C147-86, Eimear Healy, Four Districts Woodland Habitat Group](#))
13. Calls on SDCC to map, maintain and expand the diversity of the current mosaic of natural, managed and man-made habitats in the Townland of Rathcoole and its Landscape Characteristic Area. ([SD-C147-86, Eimear Healy, Four Districts Woodland Habitat Group](#))
14. Requests that Rathcoole Woodlands and other habitats are protected by objectives and actions such as seeking a Special Amenity Area Order with measurable outcomes in the Plan that ensure its preservation. Requests the recognition of Rathcoole Woodland as being the first Native Woodland resulting from re-wilded agriculture land and its incorporation into Rathcoole Park. ([SD-C147-99, Ne Graver](#))
15. Rathcoole People's Park is located at the eastern end of Rathcoole Village. There is no Local Area Plan for Rathcoole. This must be rectified in the 2022-2028 Plan. Requests that Rathcoole Park be protected by specific objectives, actions with measurable outcomes in the Plan that ensures its function as a Park and its ecological benefits. ([SD-C147-99, Ne Graver](#))
16. The rivers that flow through and under Rathcoole belong to two river sub-catchments; the Griffeen and the Camac. It is important that the first order streams are protected by specific objectives, actions with measurable outcomes in the Plan that ensure their function and maintain their catchment connectivity. ([SD-C147-99, Ne Graver](#))
17. It is important that the Brugage hedgerows of Newcastle and Rathcoole are protected by specific objectives and actions with measurable outcomes in the Plan to ensure their preservation and enhancement. ([SD-C147-99, Ne Graver](#))
18. Requests that the remaining unculverted first order streams in the upper catchments of the Griffeen and Camac in the vicinity of Rathcoole be identified, protected and preserved. ([SD-C147-99, Ne Graver](#))
19. Requests that the current mosaic of natural, managed and man-made habitats in the Townland of Rathcoole and its Landscape Characteristic Area be mapped, maintained and expanded. ([SD-C147-99, Ne Graver](#))
20. Requests that SDCC Development Plan documentation be updated to safeguard the Three Corner Field (adjacent to Rathcoole Park) Area into the future, for the BCM Residents. ([SD-C147-99, Ne Graver](#))
21. Requests that all new developments recognise, respect, protect, maintain and enhance the existing historic built environment and accordingly green belts should be introduced and preserved so that these individual former villages (Newcastle, Rathcoole and Saggart) retain their identity within rural surroundings.
  - Newcastle should become a neighbourhood in its own right.
  - Newcastle Village, being located with the rural hinterland, needs to be protected around its edges to soften the transition with the built environment.



- Green belts are required between the N7 and the Business Parks and between the Business Parks and Newcastle Village. ([SD-C147-105, James McInerney, James McInerney Planning Consultant](#))
22. That the Development Plan leads by example in preserving, valuing nature and protects rather than destroys the Rathcoole Woodlands. This could be achieved by designating it as a: Nature Reserve; Special Amenity Area Order; Special Area Of Conservation; Natural Heritage Area. ([SD-C147-127, Sally Graver](#))
  23. Calls for the Development Plan to protect the Rathcoole Woodland by reason of its rich biodiversity and pollinators which are essential for future food and medicine supplies and our very existence. ([SD-C147-127, Sally Graver](#))
  24. Preserve the Rathcoole Woodlands as part of the national heritage due to its species rich wildflower meadow, native trees, hedgerows, wetlands, springs and streams. ([SD-C147-127, Sally Graver](#))
  25. Calls for the Rathcoole Woodlands to be recognized as part of an existing Green Infrastructure, providing quality open spaces and amenities for the communities of Rathcoole and Saggart that are vital for physical and mental well-being. ([SD-C147-127, Sally Graver](#))
  26. Calls for Rathcoole Woodlands to be valued as an excellent example of a rewilded Woodland and used as a source of education, discovery and learning about nature and its benefits. ([SD-C147-127, Sally Graver](#))
  27. Proposed housing on the Rathcoole Woodlands should not be allowed to happen. ([SD-C147-127, Sally Graver](#))
  28. Request that the Rathcoole Woodlands be preserved and protected. ([SD-C147-162, Sue Dorgan, Millrace Residents association \(MRA\)](#))
  29. That the Old Paper Mill and ponds be incorporated into any plans for a heritage trail and is preserved and promoted as a site of historical significance and interest to both residents and visitors, with the potential for a visitors site with café / shop amenities. ([SD-C147-176, Lynn Tierney, Saggart Village Residents' Association](#))
  30. This submission deals with the NA of Citywest/Saggart/Newcastle/Rathcoole and deals with the issue of Rathcoole woodland. The importance of the woodland is highlighted throughout the submission, with fears that it may be replaced with houses having detrimental effects on the community. At present Rathcoole Woodlands offers many benefits for the local community, as well as reducing local flooding and having positive effects on mental health.  
  
The submission states that the rarity of a site like this within SD offers many benefits to local biodiversity in the area, as well as to the community of Rathcoole. ([SD-C147-120, Annie Flynn, Four Districts Wild Habitat Group](#))
  31. Submission requests that the Old Paper Mill and ponds in Saggart be incorporated into any plans for a heritage trail. ([SD-C147-168, Lynn Tierney, Saggart Village Residents' Association](#))
  32. The Lugg Wood on the south eastern side of Slade Valley should be developed as a park amenity for people to enjoy the views, picnic, and walk in the woods. The Four

Districts Woodland (Rathcoole Woodlands) should be preserved and developed as an amenity without compromising its ecological and hydrological value. ([SD-C147-190, Eoin Ó Broin](#))

### **Population Growth and Housing**

1. Rathcoole is a hub of a significant economic activity and should be considered a gateway town not a dormitory suburb as it has potential to create tourist, recreational and employment based activity which is proximate to rural lands serving the needs of its rural hinterland and local businesses. ([SD-C147-16, Alan Fairman, Rathcoole Community Council](#))
2. Following the expansion of the town southwards, a more balanced pattern of development would be to allow additional residential development on the northern side of Newcastle to ensure the Main Street remains at the heart of the town. ([SD-C147-74, Hugh Durkin](#))
3. Developments in Rathcoole have focused on housing needs for the greater Dublin region along the back land but there has been a lack of focus on encouraging brownfield development along the historic main street. ([SD-C147-16, Alan Fairman, Rathcoole Community Council](#))
4. Preparation of a Local Area Plan for Rathcoole that takes cognisance of all relevant spatial and economic attributes of the town. ([SD-C147-16, Alan Fairman, Rathcoole Community Council](#))
5. All the Build to Rent apartments constructed in Citywest makes it difficult to create a vibrant community if residents will only be short-medium term renters. ([SD-C147-98, Kar Kin Lim](#))
6. The percentage of social housing in Newcastle is much higher than other areas. ([SD-C147-54, Fergal Britton, ReNewcastle Community Group](#))
7. Due to an ageing population in Rathcoole and Saggart area, the Development Plan to include policy on providing independent living for the elderly and to consider factors such as residents wishing to downsize from 3 or 4 bed houses to 1 or 2 houses or apartments in a Managed environment to better manage housing stock. ([SD-C147-69, Ne Graver](#))
8. Consideration of and promote sites with potential to provide inter- generational accommodation, physical and mental wellbeing , as well as provide local , accessible activities and social housing in particular such sites that are part of programs / strategy in partnership with key stakeholders. ([SD-C147-69, Ne Graver](#))
9. In Saggart, urban sprawl is having a negative impact on biodiversity and is not cost effective when providing services and infrastructure. Compact growth is the key to achieve densities, provide delivery of more efficient public transport, allow for more efficient energy demands such as Combined Heat and Power units to combat climate change and will allow natural habitats to be protected. ([SD-C147-196, Paul Kelly](#))
10. Development in Saggart is piecemeal and the area needs a Local Area Plan. ([SD-C147-196, Paul Kelly](#))

11. Citywest has benefitted from significant investment in public transport and community facilities in the past 15 years. Given the high levels of employment at Citywest Business Campus and nearby employment centres, there is a need for ongoing growth in residential development in Citywest. Citywest's growth should not be constrained by the availability of brownfield given ample availability of well-connected greenfield sites. ([SD-C147-75, Hugh Durkin Nigel Smith](#))
12. Rathcoole has the potential to accommodate a significant proportion of the predicted population and housing need of the plan period and beyond. Based on a settlement analysis of developable land, the submission claims there is insufficient land to achieve the current Development Plan population target for Rathcoole of 5,703 persons by 2022 and that the Council need to consider other suitable land adjoining the Rathcoole settlement to achieve this target. The submission notes that the increased land and population can avail of a range of existing and planned infrastructure and retail / community services, including parks. ([SD-C147-65, Gareth Stanley](#))
13. Recommend that the population targets of Newcastle and Rathcoole are not capped to allow for market demand. The onset of Covid-19 has resulted in a desire for housing outside of the major urban centres in proximity to the countryside as people seek greater work / life balance which Newcastle and Rathcoole meet many of these new demand characteristics and are likely to be an attractive purchasing location over the life of the next Development Plan. ([SD-C147-74, Hugh Durkin](#))
14. Submission considers the neighbourhood concept is positive, but that Citywest/Saggart/Rathcoole/Newcastle should have been split into 2 different neighbourhoods, as Rathcoole/Newcastle are not identified as major growth nodes. ([SD-C147-87, Deirdre tierney](#))
15. Raises concerns that there are no 'villages' identified in SDCC. Consider that Rathcoole/Newcastle should be preserved as small towns with no more development, define Brittas as a 'village', requirement for a Rathcoole LAP. Remove huge developments like SDZ's and opt for multi-linked villages to maintain a rural context. Establish new high density villages with proper facilities and infrastructure. ([SD-C147-87, Deirdre tierney](#))
16. Citywest has seen an explosion of housing development and it is not keeping pace with the current LAP. Residents are concerned that they have no control over the development of their community, their objections to development are not been listened to. Certain areas need to be managed to prevent creation of hubs of social unrest. The submission considers that the current strategy of apartment construction is not in keeping with the older housing and would welcome a mixed housing type. ([SD-C147-90, Marie Petiet](#))
17. The submission seeks to protect and maintain the zoning of Saggart Village as a village and that any new planning applications or SHDs take the village zoning into consideration, the availability of existing adequate community services and parking availability ([SD-C147-168, Lynn Tierney, Saggart Village Residents' Association](#) )

18. Further residential growth should be encouraged in the NA of Citywest, Saggart, Rathcoole and Newcastle as well as in Kingswood. ([SD-C147-179, Development 8, Development 8](#))

### **Sustainable Movement**

1. There is limited Public Transport options for new housing in Newcastle. SDCC to consider safe sustainable transport and infrastructure options to Hazelhatch train station from Newcastle Village. ([SD-C147-15, Tony O Hara](#))
2. What local transport improvements are planned in the area as the large number of apartment blocks and increase in population will bring Citywest traffic to a halt.

Suggested sustainable transport projects include: a joined up cycle paths - from the top of Citywest Road - so Corbally, Belfry, Saggart Abbey residents can cycle to all local schools and business campus safely. Safe places to cross Citywest Road from Magna Park. Cut back the trees along Citywest Road outside Saggart Abbey to increase light, make it safer for cyclists on the road (currently trees are at eye level while cycling). These are basic things and yet Citywest is a forgotten area by SDCC. Public lighting is needed on the Blessington Road (N81) along the Belfry boundary. ([SD-C147-70, Rachel O'Callaghan](#))

3. To progress with the development of a flyover/N7 inbound exit at the Poitín Stil to divert traffic away from main Street Rathcoole. ([SD-C147-72, Fiadh Ní Dhonnchadha](#))
4. Considers that a traffic/pedestrian plan should be carried out for the growing village of Newcastle. Peak traffic flows from N7 need to be addressed, horizontal traffic calming methods are required, safe cycle and walk-to-school routes should be prioritised. ([SD-C147-209, jon norton](#))
5. Increased development of Newcastle Village needs to take cognisance of tackling climate change. This requires provision of public transport, cycle routes and links to transport hubs such as Luas in Saggart and rail-link in Hazelhatch and a bus links to serve the nearest secondary school. ([SD-C147-209, jon norton](#))
6. Increased public transport infrastructure is required to serve new development ([SD-C147-56, Paul Murphy](#))
7. Saggart requires a traffic management plan. ([SD-C147-212, Audrey Crone](#))
8. Calls for the provision of the east-west link road from the roundabout at Ballynakelly Roundabout (Newcastle Boulevard Roundabout) east of the Newcastle Village on the R120 and extending westward south of the Newcastle Village to Athgoe Road and onward to Hazelhatch Road R140 before any further development is approved within the area of the Newcastle Local Area Plan.

Calls for the provision of the traffic calming measures along the main street of Newcastle Village following the provision of the east-west link road.

Calls for the provision of the Western Dublin Orbital Route (North) from the proposed separation junction on the N7 at Tootenhill west of Rathcoole to Leixlip

Village on the N4 before expanding the area covered by the Newcastle Local Area Plan.

Calls for the provision of a regular local-link bus service, high frequency at peak times linking Newcastle Village with Hazelhatch and Celbridge Rail Station, Luas Terminus at Saggart and The Square Shopping Centre.

Calls for the provision of a Greenway Route (pedestrians and cyclists) from Newcastle Village to Hazelhatch and Celbridge Rail Station, Saggart Luas Terminus and the Grand Canal. ([SD-C147-80, James McInerney, James McInerney Planning Consultant](#))

9. Requests that policies be developed for Newcastle to shift modal choice from the private car to public transport. Provision of reliable high frequency access to the existing sustainable public transport routes and linking major shopping areas at peak times would be beneficial. ([SD-C147-105, James McInerney, James McInerney Planning Consultant](#))
10. Requests that an east-west link road from the roundabout at Ballynakelly Roundabout (Newcastle Boulevard Roundabout) east of the Newcastle Village on the R120 and extending westward south of the Newcastle Village to Athgoe Road and onward to Hazelhatch Road R140 be put in place before any further development is approved within the area of the Newcastle Local Area Plan. Request for traffic calming measures along the main street of Newcastle Village following the provision of the east-west link road with priority given to pedestrians and cyclists activity and with a ban on Heavy Goods Vehicles and a design speed of 30km to 40km per hour. ([SD-C147-105, James McInerney, James McInerney Planning Consultant](#))
11. Traffic congestion is bad in Citywest area. Proposal to connect the Boherboy development through existing estates should be strongly reconsidered as it will increase travel congestion. The proposed development beside Magna Park should have traffic lights on the existing roundabout for ease of movement, the new junction at the Shopping Centre is dangerous and has not eased congestion, the LUAS is overcrowded at peak times, and consists of shuttle services to Belgard at weekends, bus service has been reduced in the area and the Bus Connects project will see people having to change buses for onward travel. ([SD-C147-90, Marie Petiet](#))
12. Newcastle: Newcastle is greatly underserved by public transport. SDCC should engage with public transport providers to improve transport in and out of the village. Investment is required in utilities also. ([SD-C147-64, Emma Flanagan, Cairn PLC](#))
13. Any planned school should be required to have parking considerations to meet the demands / school busses to serve the students and create public transports links with Saggart and main colleges (incl. Maynooth, DCU and UCD) ([SD-C147-176, Lynn Tierney, Saggart Village Residents' Association](#))
14. Traffic management is needed as Cars are illegally parked on footpaths and traffic is at a standstill at school drop off and collection times in Saggart/Rathcoole villages. ([SD-C147-176, Lynn Tierney, Saggart Village Residents' Association](#))
15. Wider footpaths are required in the Saggart area. SDCC recently upgraded some footpaths around the village plaza which are a great addition, but only to within a

few metres of the plaza. Extending these newer footpaths along Garter Lane, towards the Business Campus and the Luas would be of benefit to many pedestrians. ([SD-C147-176, Lynn Tierney, Saggart Village Residents' Association](#) )

16. There is a requirement for a footpath on Castle Road up to the Nursing home which we have requested on several occasions. This is a barrier to residents in the Nursing Home accessing their local community. ([SD-C147-176, Lynn Tierney, Saggart Village Residents' Association](#) )
17. Request that the village bypass for Rathcoole & Saggart Village is included in the new Development Plan. ([SD-C147-176, Lynn Tierney, Saggart Village Residents' Association](#) )
18. Traffic congestion, pollution and safety with large trucks, pass through the villages as they flow from N81 through Saggart and Rathcoole in order to get to the N7 which could be diverted around the village using the bypass. The current situation impacts resident's wishes to walk and cycle. ([SD-C147-176, Lynn Tierney, Saggart Village Residents' Association](#) )
19. One hourly bus service in Newcastle to Clondalkin is insufficient. A bus service connecting Newcastle to Hazelhatch train station and the Luas in Saggart is required. There is no footpath between Newcastle and Hazelhatch train station. Concerns that building such a volume of housing in a small village such as Newcastle without improving the roads has the potential to result in a serious accident or fatality. Calls for a ban on HGVs using main street in Newcastle regardless of it being a strategic route. ([SD-C147-195, Mairéad O'Connor](#) )
20. Considers that any planned schools have parking provision to meet the demand. ([SD-C147-168, Lynn Tierney, Saggart Village Residents' Association](#) )
21. Traffic at standstill in Saggart at school drop off collection times with cars parked illegally. ([SD-C147-168, Lynn Tierney, Saggart Village Residents' Association](#) )
22. Create public transport links from Saggart to main Colleges/Universities. ([SD-C147-168, Lynn Tierney, Saggart Village Residents' Association](#) )
23. The submission requests for additional public lighting along Garter's Lane and Castle Road, extension and widening of footpaths around Saggart village and towards the Luas, provision of a footpath on Castle Road to service the Nursing Home. ([SD-C147-168, Lynn Tierney, Saggart Village Residents' Association](#) )
24. Provision of cycle infrastructure in Saggart to promote safe cycling, aid modal shift and reduce traffic congestion. ([SD-C147-168, Lynn Tierney, Saggart Village Residents' Association](#) )
25. The submission requests that a proposed bypass for Saggart Village is included in the plan, as there are traffic congestion problems and associated safety and pollution impacts in Saggart. ([SD-C147-168, Lynn Tierney, Saggart Village Residents' Association](#) )
26. Calls for the prioritisation of the establishment of the W6 orbital bus to link Newcastle Village with the Hazelhatch Train Station as part of Bus Connects. ([SD-C147-190, Eoin Ó Broin](#) )

27. Infrastructure & Utilities: Improvements should be made to public transport in the NA of Citywest, Saggart, Rathcoole and Newcastle. ([SD-C147-179, Development 8, Development 8](#))
28. Requests the provision of a Greenway Route (pedestrians and cyclists) from Newcastle Village to Hazelhatch and Celbridge Rail Station, Saggart Luas Terminus and the Grand Canal. ([SD-C147-105, James McNerney, James McNerney Planning Consultant](#))
29. Newcastle is lacking in proper public transport corridor links and there are no details of when the changes proposed by Bus Connects will be implemented. ([SD-C147-85, Eugene Wisely](#))
30. Requests the provision of the Western Dublin Orbital Route (North) from the proposed separation junction on the N7 at Tootenhill west of Rathcoole to Leixlip Village on the N4 prior to further development taking place within Newcastle. ([SD-C147-105, James McNerney, James McNerney Planning Consultant](#))
31. Calls for designated, safe, well-lit cycle paths to connect Newcastle Village to Hazelhatch and Celbridge Railway Station and the Red Luas Line terminus in Saggart.  
  
The provision of Dublin bikes services in urban areas such as Newcastle, Rathcoole and Saggart to connect to the various transport hubs and local historical attractions such as The Grand Canal, Lyons Estate, Arthur's Way and St. Finian's Well would provide an eco-friendly, carbon free form of transport and would be a great way for tourists to get around and to develop a historical trail. ([SD-C147-85, Eugene Wisely](#))





## Clondalkin, Clonburris & Grange Castle Neighbourhood Area

### Built Environment & Placemaking

1. Concerned that high rise apartment construction in Clondalkin village, especially on Watery Lane is having a negative impact on the character of the village. There should be height restrictions on new apartment blocks as they are affecting the look and atmosphere of the village. ([SD-C147-33, Matthew Lysaght](#))
2. Development of apartments and shops with its associated regeneration are welcomed in Watery Lane, Clondalkin but consider that there is overdevelopment and the development should be set back from the roadside. ([SD-C147-33, Matthew Lysaght](#))
3. Consider that local Elected Members need to engage in the planning process for Clondalkin village or there is fear it will end up like Tallaght village, where the heart of the town was torn down for generic apartment blocks. ([SD-C147-33, Matthew Lysaght](#))
4. The preservation of rich culture and heritage in Clondalkin is vital to the future development of the area and as such, future development should not comprise this rich heritage in the village with particular reference to development proposals around the Church and Convent area. ([SD-C147-193, Tom & Chris Coleman](#))
5. The vibrant Irish speaking community and associated cultural activities and facilities has vastly enhanced quality of life and opportunities for the community. This must be a priority for investment in any development plan. ([SD-C147-193, Tom & Chris Coleman](#))
6. Limit the amount of cut-price fast food outlets in the Clondalkin area and instead invest in businesses that make use of local produce and food that will not threaten the health of our community. ([SD-C147-193, Tom & Chris Coleman](#))
7. Calls for the preservation of the remaining villages in suburban Dublin, such as Clondalkin village, by creating a boundary for non-development around each of the remaining villages. ([SD-C147-77, Thomas Finlay](#))
8. The submission highlights the following regarding Public Security and Safety: litter wardens, dog wardens, parking wardens, security and safety along the canal and in Corkagh Park. ([SD-C147-207, Monica McGill](#))
9. Concerned that housing in Clondalkin is being replaced by high rise apartments, which are not sympathetic to their surroundings. Clear and sympathetic planning strategies need to be in place that identify and value the built heritage of historic places like Clondalkin village. ([SD-C147-113, John Stephens](#))
10. Welcomes the Council's engagement with locals when considering development such as the development of Brú Chrónáin at the historic Round Tower and would welcome further engagement with similar projects and value Clondalkin village as a historic site. ([SD-C147-113, John Stephens](#))
11. Highlights the need to link Clondalkin village with the mill centre to bring social and commercial activity back into the village by providing a new urban space between

the two. Recommends Clondalkin becomes a digital village with work hubs in order to attract start ups, ([SD-C147-25, Thomas Gallagher](#))

12. Calls for better security in the housing estates of Clondalkin including careful supervision of local authority housing. ([SD-C147-82, Declan Hanley](#))
13. In respect to protecting the built heritage and improving placemaking in Clondalkin, recommends that the Clondalkin Mill Ponds beside the Leisure Centre are taken into public ownership, the silt cleaned out of them, and boating and fishing set up; that the Architectural Conservation Area of Clondalkin be reviewed to consider the incorporation of some Schools, Churches, the Convent, the Library etc; that the little medieval church in St Cuthberts be secured and public lighting installed; that an activity centre be provided at the Lock House beside the 11th Lock while maintaining the structure of the building; that Clondalkin Village be pedestrianised and benches installed and that a public toilet be installed in the village. ([SD-C147-190, Eoin Ó Broin](#))

### **Climate change**

1. That sustainability forms a key feature in the Development Plan which should incorporate: Investment in clean energy from wind, solar and hydro sources, promotion of walking and cycling transport in the environs of the villages and Facilitation of reduced-waste services and events: including recycling/upcycling facilities (connected to community initiatives like men's sheds), refilling stations, swap-shops/swap-markets. ([SD-C147-193, Tom & Chris Coleman](#))

### **Community Services**

1. The submission highlights the following regarding Amenities: green open spaces, monastic garden, pony & horse clubs for young people, amenities promised for older people, dog pound, animal rescue, puppy farms. ([SD-C147-207, Monica McGill](#))
2. Calls for SDCC to develop St Culbert's park for the future of the community. St Culbert's Parks is the training grounds for Clondalkin Celtic FC which caters for over 200 kids and is the oldest soccer club in Clondalkin. Highlights the need for a playground in St Culbert's Park to serve the growing local community. ([SD-C147-192, Andrew Dunne, Clondalkin Celtic FC](#))
3. Amenities for teenagers in the greater Clondalkin area need to be prioritised such as outdoor teen spaces, mountain biking trails, additional skate parks, kayaking facilities on the canal, ziplines and adventure parks such as Skypark on the Carlingford Peninsula.

At a community level, amenities such as the use of halls for indoor activities like table tennis, archery, bowling and computer gaming would provide a safe place with facilities for teenagers to go and meet up without having to roam the streets with nothing to do. Further amenities for all ages could include a theatre and performance space, Boule/Petanque courts, an art house cinema and artists studios. ([SD-C147-190, Eoin Ó Broin](#))

## **Economic Development & Employment**

1. It is requested that the Specific Local Objective (SLO) relating to the Wilson's Auctions premises be updated within the forthcoming Development Plan to reflect the established nature of the Wilson's Auctions operations on the site and to facilitate the ongoing operation of the Wilsons business, namely replacing 'at the Former Interbloem Premises' with 'at the Wilson's Auctions Premises (c.7.7ha)' ([SD-C147-140, Alan Crawford , BMA PLANNING](#) )
2. Clonburris: Additional height at Clonburris Train station should be up for consideration. Policies within the new CDP should reflect the changing nature of Retail, to inform future amendments of the SDZ Planning Scheme. ([SD-C147-64, Emma Flanagan, Cairn PLC](#))
3. Retail: Rowlagh and Neilstown should be looked at within the Draft CDP for retail. ([SD-C147-213, Shane Moynihan](#))

## **Infrastructure & Utilities**

1. Traffic Noise.Traffic on the Naas Road passing Clondalkin is noisy. Tree planting on both sides of the Road would help ameliorate this problem. ([SD-C147-102, Niall Charleton](#))
2. The submission highlights the following regarding Public Services: drinking water standard and provision, air condition standards, voting and polling stations, postal voting. ([SD-C147-207, Monica McGill](#))

## **Natural Heritage & Biodiversity**

1. The submission highlights the following: 'Old Heritage'- Architectural Conservation Areas, built heritage, ancient roadway(s), old street furniture, SDCC naming policy and practices, Irish language, shop-front signage, character of Clondalkin, shop premises and liaise with local groups and 'New Heritage' - Liaise with people newly arrived to the area and their treatment. ([SD-C147-207, Monica McGill](#))
2. The submission highlights the following regarding natural Environment: trees, tree protection orders, conserving and maintaining waterways, wildlife protection, cruelty to animals, liaise with local groups. ([SD-C147-207, Monica McGill](#))

## **Population Growth & Housing**

1. The submission highlights the following regarding new buildings: infill building projects, boardwalk, new builds, developers' fees, planning permissions and

problems connected with them, liaise with local groups, 'bottom-up' rather than 'top-down' approach. ([SD-C147-207, Monica McGill](#))

### **Sustainable Mobility**

1. Current infrastructure and traffic levels at junction of Watery Lane and Orchard Road are at capacity and new development will only exacerbate this issue. ([SD-C147-33, Matthew Lysaght](#))
2. To extend the Red Luas line towards Clondalkin /Lucan or a new Luas Line. ([SD-C147-100, Olive O'Malley](#))
3. Cycling infrastructure within Clonburris will reduce reliance on cars. Bad lighting discourages cycling on the greenway, particularly at night. Opening the Kishoge Railway Station would encourage users to cycle to the train station. Secure cycling parking is required. ([SD-C147-35, Muireann O'Dea O'Dea, Dublin Cycling Campaign](#))
4. Kilcarbery with 1000 homes planned requires provision for cyclists and pedestrians to move around safely. An off-road cycling link to Clondalkin Village is required. ([SD-C147-35, Muireann O'Dea O'Dea, Dublin Cycling Campaign](#))
5. The submission highlights the following regarding Roadways and Streets: street signage, street lighting, care of roadside drains and drainage, official ban on political posters in Clondalkin village area, changes to traffic flow. ([SD-C147-207, Monica McGill](#))
6. Would like to see the cycleway along the banks of the Camac from Clondalkin village to the Grand Canal developed in the lifetime of this plan. ([SD-C147-49, Niall Charleton](#))
7. Calls for SDCC to promote walking school buses to reduce traffic in areas such as Clondalkin village. ([SD-C147-187, Su Murray](#))
8. It is important the Grand Canal Greenway be completed (and maintained). The section between Adamstown and Hazelhatch should be prioritised. ([SD-C147-113, John Stephens](#))

## Lucan/Palmerstown/Adamstown Neighbourhood Area

### Built Environment and Placemaking

1. The submission seeks to retain Palmerstown as a 'traditional village' with 'unique character' and to ensure positive placemaking with associated high-quality design occurs in the future. ([SD-C147-40, Alan Creaner](#))
2. Request that Development Plan includes text to protect and refuse permission in the remaining areas within Palmerstown Village and Mill Lane from development which are large-scale and overbearing until an interchange is in place at Lower Kennelsfort/R148 junction.

Request that the Written Statement of the Development Plan includes text which safeguard the Village area by restricting build height, ensuring build materials reflect the area i.e. granite, stone, brick work etc to support Palmerstown Village and showcase how a traditional village with a unique character can be protected and enhanced.

Request that the Palmerstown ACA is extended to include all homes and businesses over 100 years in the Village Area, including all stone walls in Mill Lane and surrounding areas i.e. entrance to Old Church Mill Lane. Submission is accompanied by photographs of structures within the village. ([SD-C147-124, Annette O Connor](#))

3. Built Heritage: Preserve historic and heritage villages from over development within the NA. ([SD-C147-213, Shane Moynihan](#))
4. No specific mention to the restoration of Palmerstown Silver Bridge in the Issues Paper. ([SD-C147-130, Glenn Johnston](#)) ([SD-C147-68, Robert Shevlin](#)) ([SD-C147-129, Ger O'Halloran](#))
5. Submission suggests that Adamstown is a model example of built environment and Placemaking by delivery of compact growth, through increased density whilst protecting built heritage, providing connections to sustainable transportation, and providing appropriate infrastructure. ([SD-C147-166, Castlethorn](#))
6. Weston is a historic airfield founded in, and operational since, the 1930s which was open before Dublin Airport. It is an irreplaceable element of Irish transport heritage comprising the aerodrome buildings integral to the local and wider aviation community and open space of the airfield enhancing the setting for the surrounding built environment. ([SD-C147-76, National Flight Centre](#))

### Climate Action and Energy

1. A submission highlights the County should aspire to becoming a low carbon county by increasing energy efficiencies and promoting renewable energy potential. The Draft Plan should build upon existing energy and climate action policies, by facilitating ease of access to employment zoned lands by active modes of travel. ([SD-C147-166, Castlethorn](#))

## Population Growth and Housing

1. Submission considers that there is an opportunity to consolidate further the strategic development of lands along the western rail corridor and in the vicinity of Adamstown Rail Station offering sustainable development in proximity to a rail station.

The submission highlights that Adamstown is located close to the strategic employment area of Grange Castle, which is identified as an area for potential employment development in the NPF and RSES, which is bolstered by good sustainable modes of transport linkages. in close proximity to employment zoned lands. ([SD-C147-166, Castlethorn](#))

It is further suggested that the extension of Adamstown as a strategic and sustainable town should be considered to ensure that there is a coherent plan for a strategic, sequential and sustainable development of this Metropolitan Consolidation Town where all infrastructural requirements are available to support development in a timely and sequential manner.

([SD-C147-166, Castlethorn](#))

2. This submission identifies the agricultural lands adjacent and to the west of Adamstown, at Aderrig and Tobermaclugg, which are situated on the Dublin - Kildare rail line, as being a highly suitable location to accommodate future population growth and housing needs of the County. Such an approach has regard to National Planning Policy and the RSES which promote the integration of land use and public transportation, consolidation of growth within the metropolitan area of the GDA, adherence to the sequential approach to land use zoning and specifically identify the South-West Corridor, along the Hazelhatch / Celbridge to Dublin line, as a suitable location to cater for future growth within the Metropolitan Area. ([SD-C147-137, Hugh McGreevy & Sons](#))
3. Zoning consideration request for lands at Liffey Valley to deliver future residentially-led mixed use development that can accommodate a projected population, housing growth and associated demand for services for South Dublin to be delivered over the new Development Plan period. Request that residential development and an expansion of appropriate uses such as office, medical/healthcare and education at Liffey Valley in the new Development Plan for 2022-2028. This zoning request is accompanied by a rationale for this proposal. ([SD-C147-109, Muirenn Duffy](#))

## Sustainable Movement

1. SDCC should prioritise the movement of people, instead of cars, within Lucan Village by reducing car lanes and increasing pedestrian space and cycle lanes. This will also help to reduce noise and air pollution. A further submission raises the issue of a cycle route to the Backweston agricultural labs in conjunction with Kildare County Council. ([SD-C147-44, Rebuild the Silver Bridge](#) )
2. The submission relates to the restoration of Silver Bridge, Lucan, and the benefits of opening it up to cyclists and pedestrians which offers a unique opportunity to

restore the heritage of the area and increase active travel in the community from Waterstown Park to the Phoenix Park. ([SD-C147-129, Ger O'Halloran](#))

3. Opportunity to improve interconnectivity from SDCC to Fingal by restoration of the Silver Bridge, to develop this as a walking and cycling link to the Phoenix Park. ([SD-C147-146, Ken O'Connor](#))
4. The submission would welcome SDCC investment to improve interconnectivity from SDCC to Fingal by restoration of the Silver Bridge, to develop this as a walking and cycling link to the Phoenix Park. ([SD-C147-145, Joe Gilligan](#))
5. Restoration of the Silver Bridge will have benefits for active travel and health, encouraging a modal shift away from cars and creating connectivity through the Greater Dublin Area Cycling Network. ([SD-C147-149, Ross Boyd](#))
6. Include a plan to re-instate Silver Bridge as a cycle and pedestrian link to Phoenix park. ([SD-C147-184, Colm Walsh](#))
7. Protection of space enhances the prospect for extending, in conjunction with adjoining county authorities, the Liffey Cycle Route / Greenway from Dublin city centre, into County Kildare and beyond. ([SD-C147-76, National Flight Centre](#))
8. Adamstown:
  - Improved bus travel times are required
  - Improved cycling infrastructure could reduce the burden on buses and remove the need for more car parking.
  - Additional off-road cycling infrastructure within Adamstown is needed.
  - Signage which informs cyclists of journey times to various locations
  - Kissing gates and unfinished sections of the cycle network from Adamstown to Hazelhatch inhibit its full potential. ([SD-C147-35, Dublin Cycling Campaign](#))
9. Submission suggests that Adamstown provides sustainable movement by way of its rail station, providing access to employment centres and education centres in Kildare and also to employment zoned lands within SDCC.

Maximising the strategic nature of Adamstown will support significant infrastructural investment in the planned electrification of Kildare rail line with critical mass. ([SD-C147-166, Castlethorn](#))

10. Recent granted planning permissions will impact sustainable movement and the current sustainable movement infrastructure and future development will impact this further at the expense of the safety and quality of life of all Palmerstown Village Residents, Businesses and Visitors to the Village.

The Bus Connect proposal for Palmerstown Village will remove and outbound lane at St. Fintan's Terrace and no left turn at the Lower Kennelsfort Road/R148 which will have a detrimental effect on the quality of life of Residents and will ensure traffic chaos will occur when the Build To Rent Apartments are completed. ([SD-C147-124, Annette O Connor](#))

11. Concerns are raised to the potential traffic congestion as a result of a Strategic Housing Development granted permission on the 'Vincent Byrne Site' at Kennelsfort Road, Palmerstown due to the lack of roads infrastructure (fly-over) being put in place. Transport infrastructure is sought to improve traffic impacts within the village. ([SD-C147-40, Alan Creaner](#))

## **Community Services**

1. Community Services: The CDP should look at a broader definition of Community Services, with commitment to provision of green space a core focus of the CDP. ([SD-C147-213, Shane Moynihan](#))
2. Community Services: The southern and eastern parts of Lucan should be looked at for investment in community services. ([SD-C147-213, Shane Moynihan](#))
3. Submission considers that Adamstown's geographic context provides for opportunities to optimise the Grand canal Greenway to contribute towards wider community benefits. ([SD-C147-166, Castlethorn](#))
4. Requests the inclusion of a Specific Objective in respect of the Edmundsbury lands located within the Liffey Corridor as follows: 'South Dublin County Council will examine and explore means and mechanisms to realise a Liffey Valley Park. In doing so they will engage with the landowners and the promoters of this objective together with sectoral interests with a view to seeking consensus on how this can be achieved, so as to reinforce the role of Lucan as a service centre and residential catchment area and provide for the wider recreational and residential needs of the growing Dublin Metropolitan Area' ([SD-C147-161, O'Flynn Group](#))

## **Economic Development and Employment**

1. South Dublin should, in its development strategy, facilitate the continuing use and further development of Weston Airport, as a regional and national centre for professional aviation training, for general aviation activity, for aviation-related tourism and economic growth, as a recreational and educational facility for the Lucan / Leixlip and surrounding communities.

Weston has significant potential to be a location for ground-based aviation-related tourism attractions, contributing to the local economic development and employment and can be developed to become a national/international destination for young people (and others) interested in learning about aviation or engaging in part- or full-time education in the sector, further adding to the County's economic goals.

If Weston Airport were no longer to exist, Dublin would be the only major European city without a regional centre for professional flight education, or a general aviation facility and if ceased, it can be extremely difficult, if not impossible, to revive.

Weston Airport promotes and provides high quality specialised physical infrastructure, to allow development to progress in a sustainable manner and play



an important role in securing future economic investment in the County. ([SD-C147-76, National Flight Centre](#) )

2. In respect to Liffey Valley, indicates that: The current Major Retail Centre zoning objective at Liffey Valley is suitable and should be retained; The current 'Level 2' Centre designation for Liffey Valley in the South Dublin County Retail Hierarchy is suitable and should be retained;
3. The current 'Core Retail Area' as defined in Figure 5.6 of the current Plan which includes the LVRP lands should be retained. Calls for the following Specific Local Objective in the new Plan - "Within Core Retail Area of Liffey Valley Major Retail Centre, the Planning Authority will support a greater mix of uses and will apply flexibility in allowing types of retail stores where a mix of bulky and non-bulky goods can be sold. ([SD-C147-142, BMA PLANNING](#) )
4. The submission considers Adamstown is located in close proximity to employment zoned lands offering opportunities for sustainable development. ([SD-C147-166, Castlethorn](#))
5. Lucan has been awarded significant investment under Fáilte Ireland's Destination Towns funding programme. Fáilte Ireland wish to see this investment further capitalised upon and supported by SDCC. Key interventions can include improved public realm, improved wayfinding and signage, the promotion of town facilities and tidy towns initiatives. Lucan has excellent links via greenways and the River Liffey which could allow visitors explore County Dublin outside the city centre by bicycle or water-based recreational activity. ([SD-C147-228, Fáilte Ireland, Fáilte Ireland-National Tourism Development Authority](#))

### **Natural Heritage and Biodiversity**

1. The submission relates to the restoration of Silver Bridge, for SDCC to work collaboratively with Fingal to create a Liffey Valley National Park, linking St Catherine's Park to the Phoenix Park as a sustainable transport mode while also protecting nature along the River Liffey and ensure it can be used as a public amenity. ([SD-C147-149, Ross Boyd](#))
2. Palmerstown and north of the R148 is rich in natural and built heritage. The new Plan should seek to improve the potential for increased visitors to these sites while maintaining the natural biodiversity and heritage of the entire Liffey Valley area. ([SD-C147-202, Cllr Alan Hayes](#))
3. Retention of Weston as a rural space on the south bank of the River Liffey, offers protection of exquisite natural heritage and biodiversity in the locality. Its use as an airport guarantees that maintenance of open space, guarantees purity of Liffey waters in an area, avoids urban sprawl, provides a precious, substantial green space buffer on the Western border of the County. ([SD-C147-76, National Flight Centre](#) )
4. Another submission seeks access to forest lands at Clonard and Clonbrone lands, Eskill Hill, Lucan from the east, west or north ([SD-C147-132, Eamon Brennan](#))

5. Natural Heritage & Biodiversity: The Grand Canal should be protected as it is an hugely important ecological corridor. ([SD-C147-213, Shane Moynihan](#))
6. The submission considers the Grand Canal Greenway has an opportunity to protect and develop natural heritage and biodiversity. ([SD-C147-166, Castlethorn](#))

#### **Infrastructure and Utilities**

1. Submission suggests that infrastructure as constructed in Adamstown North has been designed to support potential future development at Adamstown South. ([SD-C147-166, Castlethorn](#)).

## **Naas Road Neighbourhood Area**

### **Climate Action and Energy**

1. BOC Gases contributes to and supports climate action, by supplying hydrogen fuel to zero emission buses in Europe, in Dublin BOC Gases are involved in plans to facilitate green Hydrogen Bus Trials, which involves refuelling at Bluebell site. ([SD-C147-97, Glen Jenkins, BOC Gases](#) )
2. Identifies a need for additional green infrastructure in the Naas Road area. ([SD-C147-97, Glen Jenkins, BOC Gases](#) )

### **Economic Development and Employment**

1. Submission highlights that it is Boc Gases intention to remain in its Bluebell site long-term and policies must be formulated in context of this Seveso operation. ([SD-C147-97, Glen Jenkins, BOC Gases](#) )
2. Submission considers that more supports should be available for the expansion of existing employment sites and to expand employment types. ([SD-C147-97, Glen Jenkins, BOC Gases](#) )
3. The Issue Paper for Naas Road fails to discuss the existing constraints of Naas Rd, 'displacement of existing businesses' has raised concerns and uncertainty for employers. ([SD-C147-97, Glen Jenkins, BOC Gases](#) )
4. The Office encourages the planning authority to continue its engagement with Dublin City Council, the National Transport Authority and other key stakeholders such as the IDA in developing its economic and employment strategy for the forthcoming plan with particular reference to the Naas Road Corridor.
5. Naas Road: The potential to re-intensify older industrial estates such as Naas Road/Ballymount, brownfield lands in Tallaght/Cookstown and to provide for high tech and research and development employment at Grangecastle which are identified as strategic employment locations in the RSES. A coordinated and joint approach with Dublin City Council will be required in respect of the redevelopment of the Naas Road corridor to ensure an appropriate balance between residential development, the re-intensification of employment lands and mixed uses. ([SD-C147-144, Maude Ni Bhrolchain, Office of the Planning Regulator](#))

### **Population Growth and Housing**

1. Submission relates to lands at the Red Cow Interchange off Monastery Road and welcomes the overall vision for the area and indicates that their site has significant potential, as an underutilised motor showroom site, to optimise the site for more intensive uses due to proximity to the Red Luas line in accordance with National and Regional planning policy. ([SD-C147-219, Sean O'Donnell Sean Lillis](#))

2. Concerns raised regarding challenges of providing high density residential development in areas of existing brownfield industrial sites. Technical and financial feasibility of regeneration areas must be explored. ([SD-C147-97, Glen Jenkins, BOC Gases](#) )
3. Submission suggests it supports delivery of new housing for growing population in Naas Rd area, but requires retention of certain commercial operations within these regeneration areas. ([SD-C147-97, Glen Jenkins, BOC Gases](#) )
4. Naas Road area (Ballymount/Greenhills Industrial Estate) requires a Local Area Plan. ([SD-C147-198, Carly Bailey](#))

### **Sustainable Movement**

1. Safe cycle infrastructure is needed at Naas Road/Ballymount. ([SD-C147-35, Muireann O'Dea O'Dea, Dublin Cycling Campaign](#))
2. Submission commends great improvements in public transport in SDCC, but highlights requirement for convenient road access, suitably maintained for distribution operations. It highlights the lack of road maintenance in JFK Industrial Estate and lack of traffic management. ([SD-C147-97, Glen Jenkins, BOC Gases](#) )
3. Particular reference was made to the cycle lane on the Naas Road heading from the Red Cow towards the city centre which is segregated for circa 200m and then ends at a left turn slip road at Woodies which is a dangerous point to enter traffic, that the existing segregated cycle/pedestrian bridge from the Ballymount Industrial Estate that crosses the N7 needs serious improvement as markings have faded and there is insufficient signage and that there is a need from cycle lanes within Ballymount Industrial Estate. ([SD-C147-24, Niamh Stephens](#))
4. Request for additional pedestrian crossings along the Ballymount Road Upper. ([SD-C147-24, Niamh Stephens](#))

## **Rural Uplands Neighbourhood Area**

### **Built Environment and Placemaking**

1. Installation of livestock grids on public roads (As used in the Curragh and Mount Leinster) along the Dublin Mountain commonage roads to prevent animals from roaming freely down to the lowlands, causing nuisance and damage to property, will have a positive impact on the unique and important landscape, Biodiversity and Tourism potential. ([SD-C147-89, Glenasmole Concerned Residents & Farmers](#))
2. To retain and strengthen the strong sense of place requires help to the necessary physical and community supports to ensure communities thrive and that the unique landscape is maintained and continues into the future. [SD-C147-226, Brock McClure](#))

### **Community Services**

1. There is currently a lack of nursing home facilities within the County and in the vicinity of Orlagh House and the proposal for a health campus in a rural setting presents an opportunity for an integrated suite of care and facilities to complement the nearby school site and residential zoned belt along Stocking Avenue and Hunters Road, providing an opportunity for the elderly to continue to live in the area. ([SD-C147-226, Brock McClure](#))

### **Economic Development and Employment**

1. The provision of a nursing home with complementary health and recovery uses including accommodation has potential to generate significant levels of diverse employment opportunities to the local rural economy area. ([SD-C147-226, Brock McClure](#))
2. To have the provision of 'RU' zone maintained and expanded to allow for other uses suitable in a rural setting for health and wellbeing purposes which benefit from 'green' setting, including housing for older people, live-work units, nursing homes, health care and recuperation uses or in the case of the submission lands, the inclusion of a specific local objective for provision of a health and wellbeing centre at Orlagh House and grounds which is supported by a preliminary Masterplan. ([SD-C147-226, Brock McClure, Brock McClure](#))

### **Natural Heritage and Biodiversity**

1. The provision of health campus type developments provide a sustainable economic and ecological future for Orlagh House with proper management of trees, hedgerows, woodland and water courses as an amenity including linkages with surrounding uses. ([SD-C147-226, Brock McClure](#))
2. There should be no further rezoning of land for housing or other development above the current limit of 120m in height. This is in the interest of climate change

mitigation, biodiversity, and amenity value/protecting views. Such lands should be prioritised for re-wilding and planting woodlands (grants are available for native deciduous trees). ([SD-C147-169, South Dublin Conservation Society, South Dublin Conservation Society](#))

### **Sustainable Movement**

1. That any grant of permission to develop the hotel leisure recreation and tourism elements on Woodtown Manor House and lands include a provision for the adequate upgrading of Stocking Lane to meet the requirements of the extra traffic generated by such development. ([SD-C147-126, Simon Clear & Associates](#))

## Tallaght Neighbourhood Area

### Built Environment & Placemaking

1. Place-making isn't just the construction of new areas with outdoor seating and uses, it is an unbroken walkable environment built at a human scale which has a place for everybody, instead of being anchored by a single commercial use. ([SD-C147-18, jos fullam](#))
2. For Tallaght to grow as a destination of desire, future development must focus on the construction of high-density mixed-use developments to foster a diverse local economy, built on commerce and nightlife to allow Tallaght to flourish as a destination instead of a place to commute from. ([SD-C147-18, jos fullam](#))
3. The restoration of Ballymount gatehouse is very welcome work. ([SD-C147-100, Olive O'Malley](#))
4. There is history in the Tallaght area and many monument's and protected structures. These should be preserved and protected for unsightly development in surrounding areas. Tynan hall should also be preserved and developed in the same way as the Tower in Clondalkin. ([SD-C147-100, Olive O'Malley](#))
5. The Development Plan should celebrate the unique and ancient Heritage of Tallaght through a designated focal point (Museum or Heritage Centre) in or close to the civic centre of Tallaght village to provide a valuable point of interest and attract people to the locality and informing them of the extraordinarily rich history and heritage of the area and promote a unique sense of civic identity and pride in the locality which can contribute to the local economy, tourism and recreation, education, culture and community development. ([SD-C147-178, Albert perris](#))
6. Welcome the recent works to a protected structure in Ballymount Park and request other such structures in the immediate area are retained and maintained, e.g. Katherine Tynan Whitehall Ballymount, a structure of significant historical interest. ([SD-C147-220, Martin Purcell](#))
7. Implementing & Upholding ACA's in Tallaght Village. That the council makes every effort to ensure that the shop frontages in Tallaght village reflect the historic nature of the village and that the Plan includes measures that not only discourages modern, gaudy, bright, signage but enforces existing signage regulations in areas of conservation and if they don't exist ensure that they are introduced and enforced. ([SD-C147-110, Teresa Costello](#))
8. The Tallaght village ACA needs proactive heritage auditing and support. The village should have a community led design statement and focused enforcement to drive up the compliance to guidelines and levels of compliance. There is a proliferation of takeaways, large obtrusive neon signs and a move away from the traditional style buildings and architecture on Main St and Main Road. Tallaght would benefit from a series of street art that depicts local heritage. ([SD-C147-211, Gerard Stockil, Tallaght Community Council](#))
9. To request that the Development Plan makes provision in Tallaght for a landmark centrepiece (Heritage/Museum offering) which celebrates its rich and long history. This should be down in partnership with Consultants and the public as it did with

regard to the creation of the Hellfire Club Visitor Centre and should be extensive and wide-ranging in its scope. ([SD-C147-175, John Lahart](#))

10. Tallaght - Strong centre and local employment

Tallaght town centre requires a strong town centre with increased employment opportunities and public facilities.

([SD-C147-61, Peter Byrne, South Dublin Chamber](#))

11. Calls for the high-density housing that is planned for the REGEN area in Tallaght to be very high quality and an attractive place where people would want to live. ([SD-C147-203, Betsy Omidvaran](#))

12. This submission deals with a number of Strategic Issues which deal with the Tallaght area. Built Environment & Placemaking:

- Looking for an installation of a brown heritage sign (Welcome to Tallaght) at the M50 Gateway.
- Request for black village style sign at Tallaght Village.
- Extension of the Tallaght village ACA.
- Detailed list of protected structures within Tallaght.

A project to capture all the stories of Tallaghts lost townlands and lost grand houses should be established. ([SD-C147-208, Gerard Stockil, Tallaght Community Council](#))

### Climate Action and Energy

1. 'SDCC make public their information on the energy potential of the Balrothery Weir and the Dodder in general, with a view to a Community Energy Scheme and that the Council support any local bid for a RESS Scheme. ([SD-C147-73, Eugene Barrett, Knocklyon Network](#))'

### Community Services

1. Due to recent growth population in Tallaght, there is a need for a second garda station for people to feel safe in their communities. ([SD-C147-220, Martin Purcell](#))
2. Concerned that community facilities have not kept abreast of increased housing development in Kiltipper, Marlfield, Old Court, Deerpark, Elder Heath and more planned for Killinarden hill. There is a need for increased community centre space for indoor recreational activities that can support them all year round. ([SD-C147-210, Gerard Stockil, Tallaght Community Council](#))
3. Request that the Development Plan ensures that existing and planning Community Services can support the large population growth in a small area envisaged under the Tallaght LAP. ([SD-C147-200, Gerard Stockil, Tallaght Community Council](#))
4. Highlights the need for toilets and changing facilities to be available to the soccer and Gaelic teams that use the four pitches in Aylesbury Park as currently they do not have any facilities. ([SD-C147-188, Teresa Costello](#))



## **Economic Development & Employment**

1. Greater investment required in areas such as Jobstown and Killinarden, as these areas are disadvantaged and need employment schemes for younger people. ([SD-C147-98, Kar Kin Lim](#))
2. Tallaght has lost manufacturing plants and industry over the last couple of decades which are then replaced by Data Centres which use massive amounts of energy and water and employ very few people and would ask that the number of these centres are limited in the area. ([SD-C147-220, Martin Purcell](#))
3. Concerns that Tallaght is losing its employment and industry base to make way for residential development. That new employers will find it difficult to source sites to attract large industries. Tallaght needs to retain its competitiveness to attract economic investment. ([SD-C147-201, Gerard Stockil, Tallaght Community Council](#))
4. The submission requests the council to explain how the Tallaght Local Area Plan states that BOTH employment and population will increase, however the Issues paper on Tallaght states that 'regeneration may cause displacement of some business', which seems to suggest that jobs in the area may be reduced. ([SD-C147-201, Gerard Stockil, Tallaght Community Council](#))
5. Requests that Local Area Plans throughout the County but particularly so for the Fortunestown area are given the heightened role they could play in South Dublin's future from a workforce and economic development perspective. ([SD-C147-138, Rohan Holdings Ltd. Rohan Holdings Ltd., Rohan Holdings Ltd.](#))
6. Requests that the Cheeverstown area remains well placed to accommodate key employment-generating investment in the near-term and requests that due regard is had to safeguarding and supporting the timely delivery of new investment and job creation in the Cheeverstown/Fortunestown/Citywest areas. Highlights that the NPF and RSES speak of 'Fortunestown' and the 'emerging town of Citywest/Saggart' which it is important to ensure can consolidate and re-intensify with an appropriate mix of land uses for a sustainable and compact pattern of urban growth. The presence of the Luas line further reaffirms the notable role that Fortunestown/Cheeverstown and the wider environs will play in this part of South Dublin. ([SD-C147-138, Rohan Holdings Ltd. Rohan Holdings Ltd., Rohan Holdings Ltd.](#))
7. This submission relates to a business which exists within Cookstown Industrial Estate. They strongly support the issue paper comment on 'retention of employment alongside mixed uses in Cookstown', as this will protect employment use in areas undergoing regeneration. ([SD-C147-167, Ed Barrett, Gravis Planning](#))

## **Infrastructure & Utilities**

1. The submission welcomes the progress in connecting the Peamount and Saggart treater water reservoirs and the N81 Holywood Cross to Tallaght Road Improvement Scheme should be supported in the new Development Plan to support the expansion of the commercial and residential development required by residents of SDCC. ([SD-C147-74, Hugh Durkin](#))

2. Utility boxes should be placed along boundary walls not to block site lines at junctions. Bridge in Sean Walsh Park should be retained. ([SD-C147-208, Gerard Stockil, Tallaght Community Council](#))

### **Natural Heritage & Biodiversity**

1. To keep the area surrounded by the M50/N7/Belgard road a green belt as it is the green "lung" that is a vital for the Tallaght/ Clondalkin area. Any change would have a major negative impact on the health and wellbeing of the residents of Tallaght and Clondalkin and development of this area would also lead to over densification of the area and would not have as major an impact as re-zoning of this vital green belt. ([SD-C147-100, Olive O'Malley](#))
2. Ballymount Park is a fantastic facility and needs to be retained or even extended if possible. ([SD-C147-220, Martin Purcell](#))
3. Need to maintain a buffer between Tallaght, Clondalkin and Naas Road to stop the urban sprawl. ([SD-C147-220, Martin Purcell](#))
4. Requests that a marker be located at the site of parch marks found in Aylesbury Park. ([SD-C147-191, Denise Delappe](#))
5. Calls for Tree Preservation Orders around Kiltalawn House, TUD Tallaght, The Priory, the hedgerow on the N81 through Jobstown, the hedgerows on the Kiltipper Road, Bohernabreena Road and Ballymanna Lanes and The Priory woodlands and heronry. ([SD-C147-194, Gerard Stockil, Tallaght Community Council](#))
6. Local Heritage and Tallaght heritage centre to be provided within the Plan in line with what is stated within the Tallaght LAP. ([SD-C147-208, Gerard Stockil, Tallaght Community Council](#))
7. In relation to the Dodder Valley park and surrounds, recommends a number of improvements including the development of a lopped walk from Old Bawn Bridge and Waterfall to the City Watercourse and Balrothery Weir with clear sightlines of the two protected structures; the upgrade the existing bridges at Watergate and Bolbrook; the nomination of the cycle bridge that joins Kilininny to Bawnville as 'The Jim Lawlor bridge'; the provision of an open lattice footbridge or similar at the old Bawn bridge.

In Tallaght town centre, recommends that the Poddle river is brought out of hiding to create a visual asset in the town centre; specific greening the community projects be run to help restore green assets / biodiversity in the town centre area such as large pollinator beds, wetlands, sculpted grassed mounds and planting of Stepping-Stone Forests.

In relation to Sean Walsh Park, recommends a number of improvements including the provision of a viewing tower; that the marshy lands at the southwest end of the park be retained for passive recreation only to protect existing wildlife, together with the provision of flowering pollinator meadows and hedgerows in this area to provide visual amenity; provision of Tea rooms and a Farmers market.

Other recommendations in the Tallaght area include addressing the problems of scrambler bike access to parks; improving pedestrian access to Tymon Park at Spawell; carrying out an audit of the natural play areas installed since 2010 to assess the success of them; include an SLO to scope and design for the provision of formal entrances and boundaries at the Dodder Valley Park, Killinarden Park, Jobstown Park and McGee Park; include an SLO to ensure water quality of our waterways including rivers, streams and canals; include an objective for a research project to identify field names and farm lands in 1920 in the Tallaght area; protect the rural areas in Tallaght; retain the SLO in the existing Plan to install animal grids in Cunard and Piperstown and set a completion date; for SDCC to work in collaboration with the owners of Whitehall, Kathrine Tynans house and farm to provide public access to these lands as a tourist amenity, including making the protected house weather proof; the creation of a County tree nursery in Tallaght.

Calls for Tree Preservation Orders around Kiltalawn House, TUD Tallaght, The Priory, the hedgerow on the N81 through Jobstown, the hedgerows on the Kiltipper Road, Bohernabreena Road and Ballymanna Lanes and The Priory woodlands and heronry. ([SD-C147-194, Gerard Stockil, Tallaght Community Council](#))

### **Population Growth & Housing**

1. Based on Tallaght's population, range of services and infrastructure, is a city in its own right and should be independent of Dublin City. ([SD-C147-14, Joe Cully](#))
2. The policy of the Development Plan needs to focus on high quality walkable and dense mixed-use developments in brownfield sites and not the continuation of low-density sprawl seen south and west of Tallaght Town Centre. ([SD-C147-18, jos fullam](#))
3. Concerns are raised that too many SHD (Strategic Housing Developments) are being granted permission in Tallaght, the majority are built to rent apartments, which do little to facilitate true placemaking or encourage people to live and work in Tallaght, leads to reduced greenhouse gases or create sustainable communities. ([SD-C147-201, Gerard Stockil, Tallaght Community Council](#))
4. The New CDP must harmonise with the Tallaght LAP or if required, CDP should inform the LAP through amendments as there are differences between the Issues Paper and the Final LAP figures and the phase 'Long Term period' needs to be clarified. ([SD-C147-200, Gerard Stockil, Tallaght Community Council](#))
5. Clarify why the growth of Tallaght under the LAP is unsustainably large when compared with the growth of the Overall County and National / Regional Projections. ([SD-C147-200, Gerard Stockil, Tallaght Community Council](#))
6. A SDCC part 8 application (Belgard Square) is contradicting the Tallaght Local Area Plan policy for the minimum 30% requirement for 3-bed units and request SDCC withdrawn the application as all developers in the County could use this decision to show the LAP has no meaning whatsoever. ([SD-C147-200, Gerard Stockil, Tallaght Community Council](#))
7. A detailed Plan which demonstrates how the population and job figures in the LAP are accommodated without displacing jobs and relocating established economic

engines as the current market focus is on high density housing without corresponding employment development for Tallaght. ([SD-C147-200, Gerard Stockil, Tallaght Community Council](#))

8. Request the Council to lobby the Government to increase the minimum floor spaces in all apartments to accommodate home-based working and space for a work hub / office as a vital feature of attractive, functioning homes. ([SD-C147-200, Gerard Stockil, Tallaght Community Council](#))
9. Request an SLO for Tallaght which ensures sustainable development and a reduction in vacancy generally stating that with a massive overhang of empty & unfinished apartments in Tallaght - a change in housing type is needed not more of the same. ([SD-C147-200, Gerard Stockil, Tallaght Community Council](#))
10. SDCC also need to encourage other types of housing types to widen the housing stock and appeal to families and ensure a wide social demographic are attracted to live in Tallaght town centre. ([SD-C147-200, Gerard Stockil, Tallaght Community Council](#))
11. Request an SLO to create a demographic mix who make Tallaght their long term home by ensuring there is a robust mix of housing types in the County Town to meet the criteria of 'thriving' and drive the local economy. ([SD-C147-200, Gerard Stockil, Tallaght Community Council](#))
12. All new developments in Tallaght should include family sized homes, with no more studios provided as well as a reduction in 1 bed apartments due to Covid-19 (suggested SLO provided).
  - An SLO to be included in the Plan which relates to density, one that will make Tallaght 'more sustainable and not cluttered'.
  - Traditional village centres should be kept as vibrant and sustainable centres and follow a consistent design statement.
  - SLO required in the village regarding building height. ([SD-C147-208, Gerard Stockil, Tallaght Community Council](#))

## **Sustainable Mobility**

1. The current Luas red line service is insufficient at peak times and would ask that high capacity public transport is provided and perhaps the Metro extension is revisited. ([SD-C147-220, Martin Purcell](#))
2. Safe cycling infrastructure would benefit the area and would reduce carbon emissions. ([SD-C147-220, Martin Purcell](#))
3. There may be difficulties in combining pedestrian and cycles on the same paths without separation. Many pedestrians are accompanied by dogs, all cycles should be required to have bells. ([SD-C147-73, Eugene Barrett, Knocklyon Network](#))
4. Asks that the new Plan include the completion of the pathway in Aylesbury Park in Tallaght to full circuit pathway within the boundaries of the park, providing a safe looped walkway that can be enjoyed by all people, young, old and those with

reduced mobility and providing a vital facility in an expanding community. ([SD-C147-191, Denise Delappe](#))



## **Templeogue/ Rathfarnham / Walkinstown / Firhouse Neighbourhood Area**

### **Built Environment and Placemaking**

1. The submission seeks the development of a 'mini park' named after Austin Clarke within the Corrybeg Way development, in Templeogue, to prevent the spaces decline into wasteland and to erect a 'marker' to the poet in the Park. ([SD-C147-204, John Duffin](#))
2. Support a 'street artist' to compose a gallery to Austin Clarke in the Bridge underpass, which will enhance the natural setting of Templeogue Weir. ([SD-C147-204, John Duffin](#))
3. Provide safety improvements, maintenance and enhancement works for the Austin Clarke bridge. ([SD-C147-204, John Duffin](#))
4. Quantum of Open Space in new Estates is reduced in comparison with older Estates. Garden are reducing in size and the Greenery is diminishing as a percentage of the land. ([SD-C147-73, Eugene Barrett, Knocklyon Network](#))
5. Requests the inclusion of Edmondstown into the Templeogue/Rathfarnham area. ([SD-C147-224, Cunnane Stratton Reynolds, Cunnane Stratton Reynolds](#))
6. Suggests ways of improving Perrystown Village including: nice paving & lighting, better traffic management, a library, a 50-metre swimming pool, hanging baskets, playground, seating, better parking, improvements to buildings, remove big ad hoardings, give tax breaks for, dedicated space for temporary traders, a farmers market type area, a focal point such as sitting area, fountain, monument, statue, good transport facilities, a festivals and other community events, more facilities for people of all ages. ([SD-C147-141, Ross O'Mullane](#))
7. Request that a Specific Local Objective is included within the Written Statement of the new Development Plan which facilitates hotel, leisure, recreation and tourism development at the Woodtown Manor House and lands, Stocking Lane, Rathfarnham subject to: Due consideration being given to ensuring the conservation of historic, architectural and archaeological features of existing buildings and site. ([SD-C147-126, Paula Shannon, Simon Clear & Associates](#))

### **Climate Action and Energy**

1. SDCC make public their information on the energy potential of the Balrothery Weir and the Dodder in general, with a view to a Community Energy Scheme and that the Council support any local bid for a RESS Scheme. ([SD-C147-73, Eugene Barrett, Knocklyon Network](#))
2. Request the Council support an assessment of the Dodder Valley Parklands in relation to a community solar scheme RESS bid. ([SD-C147-73, Eugene Barrett, Knocklyon Network](#))

## **Community Services**

1. Based on the results of the Community Facilities Survey under the current Plan, that the Council draw up a strategy to provide facilities for Knocklyon such as those achieved in Ballyroan. ([SD-C147-73, Eugene Barrett, Knocklyon Network](#))
2. Lack of Community facilities in line with population growth (Community Centres, Swimming Pools, Playing Fields, Parks, Libraries, Playspaces, Schools and Primary Care Centre and Hospital facilities) ([SD-C147-73, Eugene Barrett, Knocklyon Network](#))

## **Natural Heritage and Biodiversity**

1. Improve local recreational facilities and protect biodiversity. ([SD-C147-204, John Duffin](#))
2. Local Parks should be inclusive with focus on people with additional needs. ([SD-C147-181, Pamela Kearns](#))
3. That the Council investigate the potential of the Dodder Valley Parklands for Willow Plantations, reed-beds or other Schemes that would purify water and reduce the pollution load and flooding. ([SD-C147-73, Eugene Barrett, Knocklyon Network](#))
4. That recreational and wildlife water areas be provided along the Dodder. ([SD-C147-73, Eugene Barrett, Knocklyon Network](#))
5. Dodder Valley Park, as it extends from the Ely Arch to the Bohernabreena Reservoir, should be developed as a linear park for the large population south of the Dodder from Rathfarnham through Knocklyon Firhouse Ballycullen Old Court, Old Bawn, etc and should be combined with the Dodder Greenway, the play spaces, proper footpaths, planting, to include water features and ponds, flowers, shrubs, layout etc, be implemented to raise the standard to that of Tymon , Sean Walsh etc. ([SD-C147-73, Eugene Barrett, Knocklyon Network](#))

## **Population Growth and Housing**

1. A zoning request to consider lands at Edmondstown to provide a high-quality integrated neighbourhood south of Rathfarnham. ([SD-C147-45, Paula Shannon, Simon Clear & Associates](#))
2. Edmondstown golf course state they would like the provision within H3 SLO 1 about the course to be retained. ([SD-C147-217, Edmonstown Golf Club, Edmonstown Golf Club](#))
3. They have made a further request of a 30 metres in width buffer along the boundary of the course be reserved for communal open space purposes. ([SD-C147-217, Edmonstown Golf Club, Edmonstown Golf Club](#))



## Sustainable Movement

1. Concerned there are deficiencies in the existing cycle infrastructure and lack of investment. A safe network of segregated cycle routes across Dublin Area and for more localised trips with associated infrastructure is required. Submission would welcome a County wide bike sharing scheme and adequate bicycling parking. ([SD-C147-92, John Shanahan](#))
2. Active travel and public transport should be prioritised, offer greater interconnectivity across the M50 and provide orbital public transport routes. Road extensions and realignments should incorporate greenways. Increase permeability. ([SD-C147-92, John Shanahan](#))
3. Give children and young adults a voice and key stakeholder input into development transport infrastructure. ([SD-C147-92, John Shanahan](#))
4. There is a lack of car parking facilities for Tymon Park. The existing car parks are full, and users are parking in the adjacent residential areas. The submission highlights a need for a car park at the junction of Limekiln Road and Limekiln Avenue. ([SD-C147-34, Michael Griffin, WORK Residents Association](#))
5. There is a need for the provision of a Metro to South Dublin County, especially towards Firhouse. It is inadequate to only have bus provision east of Tallaght, as there are pinch points enroute into Dublin City, such as at Terenure. Metro is considered the most ideal sustainable transport method for South West Dublin. ([SD-C147-148, Brendan Heneghan](#))
6. Improve pedestrian mobility along the stretch of Templeogue Road from Spawell roundabout to village and provide a ramped access to the underpass and a wheelchair accessible fishing platform. ([SD-C147-204, John Duffin](#))
7. Welcomes Bus Connects initiative to encourage people to use public transport. Consider that Metro South should be extended to Ballycullen and link to Luas in Tallaght. Increase provision of public transport in Ballycullen area. ([SD-C147-198, Carly Bailey](#))
8. Increased public transport infrastructure is required to serve new development ([SD-C147-56, Paul Murphy](#))
9. Request the Council will actively support existing emerging Sustainable Energy Community's, with particular reference to Sustainable Transport Plan for Knocklyon. ([SD-C147-73, Eugene Barrett, Knocklyon Network](#))
10. Request the inclusion of the footpaths and cycleways scheme for St Columcilles PS works under the '300K Have Your Say' Scheme, during the period of the Plan. ([SD-C147-73, Eugene Barrett, Knocklyon Network](#))
11. Knocklyon area has potential to be enhanced through better walkways, green areas which due to COVID-19 has raised the emphasis on walking, jogging, cycling which has highlighted a number of areas which need attention, including: benches, cutting back overhanging trees, briars, hedges which are dangerous to walkers. ([SD-C147-73, Eugene Barrett, Knocklyon Network](#))

12. The new Written Statement of the Development Plan should include the outcomes of a Feasibility Study for continuing MetroLink to South West Dublin, agreed by all three political parties, which are now in Government, prior to the general election. The reasons for including this statement are backed up by document which are accompanied by Reports titled: 'The case for continuing Metrolink to South West Dublin' and 'South West Dublin and the Continuation of Metrolink - Improvement in Commuting times' both documents are noted. ([SD-C147-73, Eugene Barrett, Knocklyon Network](#))
13. Bus Connects is welcome but not as a sole solution as it will never deliver sufficient capacity for all the commuters however, when combined with a Metro will meet the purpose of getting people out of their cars and into public transport. ([SD-C147-73, Eugene Barrett, Knocklyon Network](#))
14. In Knocklyon many of the walking or cycleways are not joined up and are unsafe in parts for children, and welcome the Dodder Greenway which could have a major impact both on commuting and leisure cycling. ([SD-C147-73, Eugene Barrett, Knocklyon Network](#))
15. Most of the homes in Knocklyon depend on the car for the commute to work or school, the lack of development or foresight in the building or widening of roads is causing issue. ([SD-C147-73, Eugene Barrett, Knocklyon Network](#))
16. Suggests that Bus Connects should be fully implemented and offer connectivity to high employment centres in the County. Metro link is desirable to serve Firhouse-Bohernabreena LEA. ([SD-C147-94, Elizabeth Hickey](#))