

Chief Executive's Report On
Pre-Draft Consultation for
the Old Connaught Draft
Local Area Plan
August 2023

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1.0 Introduction

The Pre-Draft Public Consultation process for the Old Connaught Draft Local Area Plan (LAP) ran for a period of four weeks from 8th May to 6th June 2023. Two public consultation events were held in St. Gerard's Junior School, Thornhill Road, on the 18th of May 2023 and 29th of May 2023 from 4pm - 8pm. Both sessions were very well attended. Written submissions were received from the public, and the Councils' 'Citizen Space' consultation hub was also used. As well as advertising in the national press, social media channels were used to publicise the process.

A total of 38 no. submissions were received.

There was a broad range of interest in the Local Area Plan, with submissions coming from individual citizens, from residents' groups, from landowners and developers, from Prescribed Bodies and State Agencies.

The submissions covered a wide range of issues which have been grouped in a number of categories in the following sections of the document. The initial sections cover the topics that attracted the majority of submissions, namely transport infrastructure, water services infrastructure and public transport.

The report is structured to provide a high-level summary of the issues raised under each topic and to outline broadly how the Executive intends to address these issues (in the form of the likely policy/objective focus) in the draft Local Area Plan.

The following report is intended to give a summary of the submissions raised and does not purport to reflect every comment made in the submissions received.

2.0 Issues Raised

2.1 Transport Infrastructure, Roads and Traffic

A significant proportion of the submissions received, 73% in total, raise the issue of traffic congestion, transport infrastructure, land use & transport integration and active travel. The issues referred to include the substandard local roads, lack of cyclist and pedestrian facilities, the need for local road upgrades and for these to include pedestrian and cyclist facilities, existing traffic congestion, and the inability of the local roads, in particular Old Connaught Avenue, to deal with additional traffic in the area as a result of proposed development. 24% of the submissions referred to Old Connaught Avenue in respect of the existing traffic congestion, its inability to facilitate additional traffic and requests that the congestion is resolved before any new development takes place in the area.

Furthermore, reference is made in submissions, that the development of the LAP lands is contingent on the delivery of critical transport infrastructure, and references are made to the N11/M11 Junction 4 to Junction 14 Improvement Scheme (N11/M11 Scheme), the upgrade of the Old Connaught interchange (Junction 5 N11/M11), and the proposed N11/M11 Bus Priority Interim Scheme (BPIS) to tie in with BusConnects.

A submission raised the issue of an additional direct access to the M11 from Old Connaught Avenue. In other submissions, the requirement for new road links across the M11 is also raised, as is reconnecting Allies River Road to provide for pedestrian and cyclists. Submissions were also made in support of a vehicular bridge across the County Brook Glen. One submission requests the provision of a Park and Ride located just off the M11 at junction 5.

One submission recommends that an objective should be provided in the LAP for an access route across the Council owned site fronting onto Old Connaught Avenue to provide an access route for the 'A1' zoned lands to the north of Old Connaught Avenue.

Several submissions suggest a new access route to/from St. Gerard's School from Old Connaught Avenue or a new road providing a shared entrance to both Bray Emmet's GAA and St Gerard's School.

Prescribed Bodies

Transport Infrastructure Ireland (TII) highlights the strategic context of the national road network, land use and transport integration and requests that it is formally recognised as a critical stakeholder in the draft LAP process and that they are formally engaged with in the ABTA process to be undertaken to inform the draft LAP.

The National Transport Authority (NTA) in their submission, highlights the NTA GDA Transport Strategy, Climate Action Plan, Local Transport Plans (LTP), Walking and Cycling, Accessibility, the Strategic Road Network, Traffic Management, NTA Guidance Documents and Mode Share.

The Department of Transport refer to transport and accessibility to ensure accessible public transport for all, especially for persons with disabilities, reduced mobility, and older people.

2.1.1 Policy Recommendations for Draft LAP

The draft Local Area Plan will include policies and objectives for the improvement of the transport infrastructure in the area.

The Bray and Environs Transport Study 2019, updated in 2021, recommended options for the development of transport infrastructure in the area.

The 2021 Study recommended the following options for the area, including;

- To develop the Woodbrook DART station and Park & Ride;
- To provide for a busway from Fassaroe to Old Connaught over County Brook at Ballyman Glen which facilitates walking and cycling;
- To support the delivery of a bus service from Sandyford to Bray DART station via Old Connaught and Rathmichael until such time as the Luas Green Line extension to Bray is suitably advanced;
- To provide bus services to the west of the N11 in order to cater for developments;
- To facilitate the delivery of Metro South to Cherrywood;
- To facilitate the Luas Green Line extension to Bray town centre;
- N11/M11 Junction 4 to 14 improvement scheme;
- Cycle improvements listed within Greater Dublin Area Cycle Network Plan.

The draft LAP will examine the recommendations of the Bray and Environs Transport Studies 2019 & 2021, as appropriate. Any upgrades and improvements will include the provision of pedestrian and cyclist facilities, and the improvements will facilitate and allow for the introduction of bus services. Furthermore, the provision of a pedestrian and cyclist greenway and local links will be explored as part of the draft LAP.

The draft LAP will also include a masterplan for development on the overall 'A1' zoned lands which will include indicative access routes.

2.2 Water Services Infrastructure

Many of the submissions, 60% in total, raised issues and concerns regarding the water services infrastructure. These submissions consisted primarily of issues and concerns regarding wastewater/foul, surface water/SuDS, water supply, flooding and flood risk management, pumping station and a drainage area plan.

Regarding flooding and flood risk, several submissions were received from the Office of Public Works (OPW), a prescribed body, and other interested parties. The OPW submission is detailed further below. The submissions raised issues relating to flood risk management, strategic flood risk assessment, flood zones and flood relief scheme. A submission indicates that the water network constraints map showing flood zones, illustrated as part of the Pre-Draft consultation, is out of date and should be updated as a result of works undertaken in 2014. Another submission indicates the flood maps do not adequately reflect what has happened in the recent past regarding the actual flooding that has occurred, in that, some houses that experienced flooding are not in flood zones and some houses that were not flooded are in a flood zone.

Two submissions referred to the requirement for the potential location of a wastewater pumping station as part of a drainage area plan for the area.

Three submissions refer to the preparation of a drainage area plan for the area by Uisce Éireann.

Several submissions raised queries in relation to connecting existing properties into any new foul drainage network for the area and that existing housing be given priority over new housing developments.

Prescribed Bodies

The Office of Public Works (OPW) made a submission and highlighted the following guidance,

- Reference should be made to the Guidelines on the Planning System and Flood Risk Management (DHPLG/OPW, Nov 2009) issued under Section 28 of the Planning Acts and associated Circulars and Technical Appendices, to ensure that the key principles of flood risk management and sustainable planning are adopted.
 - Sequential Approach and
 - Justification Test
 - Specific Flood Risk Management Issues
-
- Flood Risk Management Plans and Flood Maps
 - Map Review Programme, ongoing review for Old Connaught
 - National Indicative Flood Mapping
 - Consideration of Climate Change Impacts
 - Impacts on Other Areas
 - Nature-based Solutions and SuDS

Uisce Éireann made a submission and indicates the Old Connaught/Woodbrook Water Supply Scheme is proposed to serve the long-term water supply needs of the LAP area and involves the provision of two new high-level reservoirs at Ballyman and the installation of approximately 11km of new trunk supply water mains to serve the developing areas of Woodbrook-Shanganagh, Old Connaught and Fassaroe. The scheme is currently under construction.

Uisce Éireann also indicate that in relation to wastewater treatment and sewer network, the area is not currently serviced. They have indicated that they are finalising a drainage area plan for the area, which is examining solutions to connect to the Bray / Shanganagh catchment. This would comprise a wastewater pumping station and a new rising main crossing the motorway to the Dublin Road foul sewer network leading to Bray wastewater pumping station. Uisce Éireann indicate that upgrade works were delivered locally east of the motorway to accommodate initial LAP flows into the gravity network and that future upgrades will be required in this gravity system to cater for full LAP growth. Furthermore, initial flow could be accommodated via local pumping to allow phased development with a larger strategic wastewater pumping station delivered when flows and connections dictate the need. They indicate that where network reinforcements such as upgrades or extensions are required, these shall be developer driven unless there are committed Uisce Éireann projects in place to progress such works.

The Office of the Planning Regulator (OPR) made a submission and highlighted that as a Flood Relief Scheme (FRS) is not likely to be delivered within the lifetime of the LAP, dlr should ensure the protection of the elements of the FRS and determine what elements, if any, of the FRS that can be put in place in tandem with the phased development of LAP lands.

2.2.1 Policy Recommendations for Draft LAP

For clarity, Uisce Éireann are responsible for foul water drainage and water supply, and dlr County Council are responsible for surface water drainage.

With regards to flooding, national Flood Zone maps were prepared by the Office of Public Works, and these maps also form part of the suite of maps included with the Dún Laoghaire – Rathdown County Development Plan 2022-2028. The Flood Zone maps identify some of the LAP lands as being within Flood Zones ‘A’ and ‘B’.

The OPW submission indicates,

‘Map Review Programme

It should be noted that in certain areas physical changes may have occurred since the preparation of the flood maps under the National CFRAM Programme that would affect the watercourse and floodplains, and hence the Flood Zones. In some areas, there may have been limited information recorded on past flood events against which to calibrate the models, and more recent flood events or other evidence that becomes available may indicate that the flood extents should be greater or lesser than those currently mapped. In other areas, very detailed local assessments may have been undertaken, such as for a site-specific flood risk assessment that could be more detailed,

contemporary and/or robust than the flood maps that were developed through the National CFRAM Programme. The OPW will review, and where necessary update, the flood maps on an on-going basis. Flood Mapping produced under the National CFRAM Programme is currently under review in the Old Connaught Wilford area. The OPW requests that Dún Laoghaire Rathdown Council note that the mapping in this area/these areas may change as part of the review process.'

Uisce Éireann have indicated in their submission, the provision of new water supply facilities in the area and that they are finalising a drainage area plan for the area.

The draft Local Area Plan will provide policies and objectives to address these issues.

2.3 Public Transport

A significant number of submissions, circa 50%, referred to issues around public transport, specifically Luas and Bus services. Issues raised include:

- Notes that the Luas to Bray has been included in the 2022-2042 NTA GDA Transportation Study, but concerned to note that the line to Fassaroe has not been included. Urge dlr to ensure that the corridor for the Luas Fassaroe link is facilitated in the LAP. The proposed bus link, with a bridge over the Ballyman valley, is to be welcomed as a temporary alternative, but its capacity can never approach that of the Luas.
- A submission indicates that the LAP should omit any reference to the extension of the Luas line south of Old Connaught Avenue to Fassaroe.
- Concerns regarding LAP prematurity in advance of firm dates for public transport links to the area, including the LUAS extension and the M11 bus corridor.
- Welcomes the inclusion of the Luas to Bray and in the meantime a local bus route will be important to the area. Notes that a cycle network should also be included on all new roads and upgrades as well.
- Notes that there is little point in building houses without the transport links so necessary for modern living - roads, trains and buses first.
- Supports the provision of Luas to Bray and suggests location of stops in the LAP lands, that the delivery of development within the LAP lands should not be curtailed indefinitely pending the delivery of the future Luas infrastructure and development within the LAP area to be supported and served by enhanced bus services, to include the busway link.
- Refers to the NTA GDA Transport Strategy and the Bray and Environs Transport Study (BETS) 2019. Suggests the upgrade of Ferndale Road and the provision of additional public transport measures, such as Bus Rapid Transit service along the M11 corridor. Further suggests that the proposed pedestrian/cyclist bridge over the M11 proposed in the BETS to be upgraded to accommodate shuttle bus services to the Woodbrook DART station and/or a branch of the Bray-City Centre Core Bus Corridor.
- Concern that the Luas line down Old Connaught Avenue onto the Dublin Road will leave insufficient space for traffic of cars and trams at peak hours.

Prescribed Bodies

A submission from the NTA states that the LAP should be guided by the NTA GDA Transport Strategy in complement with the integration of land use and transport planning. In summary, the NTA also refer to, Road User Hierarchy, Climate Action Plan, Movement at Settlement Level/Local Transport Plans (LTP), Walking and Cycling, Accessibility, Strategic Road Network, Traffic Management, NTA Guidance Documents and Sustainable Transport Indicators/Mode Share.

A submission from the TII notes that the progression of the N/M11 Junction 4 to Junction 14 Improvement Scheme, has been suspended and the N11/M11 Bus Priority Interim Scheme remains. TII also refer to land use and transport integration and Local Transport Plans/ABTA process.

A submission from the OPR states,

- Proposed N11/M11 Bus Priority Interim Scheme (BPIS) which will tie in with Bus Connects. Unclear how the BPIS, in the absence of the upgrade of Junction 5, would service the LAP lands.
- Notes that the development of the LAP lands is predicated on the delivery of Luas extension. Notes that the CDP mapping appears inconsistent with the NTA GDA Strategy 2022-2042. The planning authority should consider with the NTA the implications for the future development of the LAP lands, should the eventual Luas route run to the east of the M11.
- Reference the requirement for a Local Transport Plan, based on the Area Based Transport Assessment approach, and DMURS.

The HSE refer in their submission to Active Travel and Connectivity.

The Department of Transport in their submission asks for dlr to ensure accessible public transport for all, especially for Persons with Disabilities, Reduced Mobility and Older People.

The Department of Environment, Climate and Communications in their submission, refer to the Climate Action Plan 2023 and a 50% reduction in transport emissions. dlr is requested to consider the measures within the CAP 2023 relating to transport and reducing the demand for transport when drafting the local area plan.

2.3.1 Policy Recommendations for Draft LAP

The draft Local Area Plan will include policies and objectives for the improvement of public transport infrastructure in the area.

The draft LAP will examine the recommendations of the Bray and Environs Transport Studies 2019 & 2021, including where appropriate, policies and objectives relating to the provision, upgrade and

improvement of public transports facilities, the provision of pedestrian and cyclist facilities, and the introduction of bus services. Furthermore, the provision of a pedestrian and cyclist greenway and local links will be explored as part of the draft LAP.

Furthermore, BusConnects Route 13, which will be delivered by the NTA, proposes a high frequency route which will be at the junction of Old Connaught Avenue and Dublin Road, less than 1km from the LAP lands. This scheme has been submitted to An Bord Pleanála in August 2023.

2.4 Social & Community Facilities

32% of the submissions raised the issue of social and community facilities, including the provision of schools, childcare facilities, healthcare facilities and neighbourhood centre facilities. The majority of these submissions considered that these facilities in particular are lacking in the area and should be planned for.

Several further submissions indicate the need for the provision of neighbourhood centre facilities, education facilities, social and community facilities and improved cycling and pedestrian facilities to the existing schools in the LAP area.

A submission suggests that a neighbourhood centre should be delivered at the mid-point or later stage of the overall build out of Old Connaught to ensure sufficient population is in place to support services and pending the delivery of a neighbourhood centre, it is suggested there is an opportunity to develop a 'village green' type focal point.

Another submission suggests that the location of the neighbourhood centre would be in the lands adjacent to the Jubilee Hall.

One submission requests the relocation of the education objective for a proposed education site, from within their landholding, northwards.

A further submission submits that the most appropriate location for a mixed-use neighbourhood centre to serve the new residential community would be adjacent to the future Luas stop at Old Connaught Avenue.

Prescribed Bodies

The OPR indicates, that the draft LAP should be consistent with NPO 31 of the NPF, 'Access to Quality Childcare, Education and Health Services', with the objectives of the RSES for education facilities and the Development Plan Guidelines 2022. Their submission also refers to NPO 4, 28, 30

and 33 and indicates that the LAP should also be consistent with the objectives of the RSES for social and community facilities. Their submission also refers to the dlr LECP 2023-2028 and the Traveller Accommodation Programme 2019-2024 and in relation to schools dlr should consult with the Forward Planning and Site Acquisitions section of the Department of Education.

The OPR submission further indicates that the draft LAP should consider the demand for retail services and regard should be had to the sequential approach to the location of retail development and other provisions of the Retail Planning Guidelines for Planning Authorities (2012), and the position of the settlement in the retail hierarchy of the County Development Plan.

The Department of Education welcomed the opportunity to engage and the inclusion of the proposed Education site objective in the LAP. They also highlight the need to be mindful of unforeseen circumstances such as the Ukrainian crisis in terms reassessment of school place provision. They also anticipate that additional Special Education Needs provision at both Primary and Post Primary level will be required in the future throughout the country and this may result in schools requiring additional accommodation to meet this growing need.

It is noted that there is an education objective, for a proposed education site, provided for in the LAP area.

The Department of Public Health in their submission, request that specifics on education facilities are required.

The HSE in their submission, refer to the provision of additional health centre/facilities in the area.

The NTA in their submission, refer to the Safe Routes to School.

2.4.1 Policy Recommendations for Draft LAP

As part of the drafting of the LAP, the Council will liaise with the Department of Education, the Health Service Executive, with Wicklow County Council, and other relevant stakeholders in the area.

Furthermore, childcare facilities will be provided in accordance with the provisions of the DoEHLG 'Childcare Facilities Guidelines for Planning Authorities' 2001, and the relevant policies and objectives of the Dún Laoghaire-Rathdown County Development Plan 2022-2028.

The draft LAP will identify locations for schools, social & community facilities and neighbourhood centre uses, to provide for the new (and existing) community in Old Connaught and environs and will include objectives and policies in relation to these.

2.5 Open Space

In the region of 31% of the submissions referred to open space, recreation, and amenity. Many submissions highlighted the relative paucity of open space in and around the LAP area, including sports facilities and the wish to preserve the existing green spaces and provision of additional green spaces.

Some submissions submit that the LAP takes full account of the County's Biodiversity Action Plan 2021-25, particularly for the "Glendoo Mountain to Shanganagh corridor", suggest that there needs to be a new vision for a "Shanganagh-Rathdown Regional Park" and supports reconnecting the Allies River Road for pedestrians and cyclists, as provided for in the CDP, which should also provide for wildlife corridors across the M11.

A number of submissions support the development of green and blue infrastructure in the LAP area.

A submission indicated that open space provision in new developments should not be privatized, and concern was expressed in relation to possible relocation of Festina Lente and the walled garden.

A submission welcomes comment in the public consultation Issues Paper that making provision for green open spaces will be a key priority and suggests that Festina Lente could serve as a focal point for a surrounding open green space/parkland to serve.

One submission refers to the existing open space facilities in the area and suggests the use of green belt lands if a need for a neighbourhood/district park is identified. Suggests that the LAP should consider contributions in lieu to support the delivery of open space in the green belt lands.

A submission indicates disappointment that the Issues Paper appears to be suggesting that the existence of private/charitable-owned facilities in the Old Connaught area compensates for the paucity of public open spaces. Strongly recommend that at least one sizeable public open space (within reasonable walking distance for the residents - particularly the elderly - who live on Old Connaught Avenue) should be identified and incorporated into the Plan.

A submission refers to the oak tree at the triangle in the village.

One submission indicates that if the green belt between Shankill and Bray is to be eroded, this should be done from the perspective of how development can be achieved while prioritising nature and biodiversity. This should include linking up parks and preserving vital wildlife corridors.

Prescribed Bodies

The OPR indicates that the LAP should consider the application of nature-based solutions in implementing greenway connectivity to proposed pedestrian / cycle access across the M11 corridor in the vicinity of Allies River Road.

The HSE comments on the existing facilities in the area and points out that most of the land is not publicly available. Submits that an opportunity is afforded here to create sufficient green spaces within and around residential areas, given the 'blank slate' of the area. Green spaces should also be utilised as part of the '10-minute neighbourhood' concept, with benches and shelters at strategic places to allow rest and cover when needed.

Uisce Éireann support the enhancement of green and blue infrastructure in the area.

2.5.1 Policy Recommendations for Draft LAP

The relative lack of public open space within the LAP area is acknowledged and the draft LAP will include policies and objectives that will aim to address this shortfall, where possible. Any policies and objectives of the draft LAP will be in line with the Dún Laoghaire - Rathdown Green Infrastructure Strategy, the dlr County Development Plan 2022-2028 and the dlr Biodiversity Action Plan 2021-2025.

The provision of quality public open space will be explored in the draft LAP and the potential for the provision of greenways with pedestrian and cyclist facilities, will also be explored.

2.6 Phasing of Development

A number of submissions raised the issue of the phasing of development within the LAP area, namely that construction/occupation of the residential units should not occur prior to the provision of adequate transport and water services infrastructure (foul drainage and surface water drainage) to facilitate the development.

One submission recommends that delivery of development on the lands should not be curtailed indefinitely pending the delivery of the Luas infrastructure and that development within the LAP area be supported and served by enhanced bus services, to include the busway link. This submission also indicates that the initial phases of development within the LAP lands must be future proofed for the delivery of Luas services, and development must proceed in a manner which reflects this planned significant transport infrastructure. It further submits that the draft LAP should include an objective for an access / route across the dlr lands, to facilitate the orderly development of the LAP lands to the north of Old Connaught Avenue, which the submission considers are best suited for development in the short term.

A submission requests that the Old Connaught LAP provides a clear roadmap for the timely delivery of phased development and suggests a sequential approach to orderly blocks of development from southeast to north and northwest. This submission submits to ensure early and orderly provision of essential infrastructure, community facilities and amenities necessary for the development of sustainable communities. It also suggests that the LAP could incorporate an appropriately scaled local retail provision within one of the initial phases of development.

A submission indicates that the LAP should prioritise access and infrastructure improvements to enable the early delivery of development on the LAP lands.

Prescribed Bodies

The OPR indicate that is essential that the LAP includes a clear phasing strategy, in consultation with infrastructure providers, to ensure that adequate capacity for services (e.g., water supply, wastewater, transport, broadband) is available to match projected demand for services.

2.6.1 Policy Recommendations for Draft LAP

The draft Local Area Plan will include a section on the phasing of development on the LAP lands, clearly linking it to the provision and upgrade of the transport and water services infrastructure. The timing and level of development per a phasing schedule will be informed in part, by the timeframes of the statutory providers of enabling infrastructure with responsibility for the area.

2.7 Natural & Built Heritage, Biodiversity

With regard to natural heritage, a number of the submissions raise concerns regarding the impact of development in the area on the natural landscape, character of the area and its impact on biodiversity and wildlife.

Concerns were raised in relation to the impact on the biodiversity of the area, including wildlife, treelines and hedgerows, that any loss of green space will incur. The Ballyman Glen was also referred to as being of ecological importance, and the need to preserve the natural landscape. A number of submissions referred to the Council's Biodiversity Action Plan 2021-25 and the "Glendoo Mountain to Shanganagh corridor".

Regarding built heritage, a number of submissions raised concerns regarding the preservation and protection of the built heritage, the character of the area, and the protection of the village character of the area.

A number of submissions refer to the need for Strategic Environmental Assessment and Appropriate Assessment of the draft LAP.

Prescribed Bodies

The Department of Housing, Local Government and Heritage have made a submission referring to Archaeology, Archaeological Heritage and Nature Conservation. The submission includes several recommended policies and objectives to be included in the draft LAP. Regarding nature conservation they further recommend that breeding birds and wintering bird surveys be carried out and included in the Strategic Environmental Assessment (SEA) of the draft LAP. The submission refers to bats, badgers, deer, stoat, and pine marten in the area. It also recommends preserving the existing treelines and hedgerows along the local roads in the area, which are at least of local biodiversity value, as far as possible. The Department refer to the nature conservation significance of the Ballyman Glen Special Area of Conservation and that the SEA of the draft LAP should take into consideration potential impacts on Ballyman Glen SAC, including any proposed bridge over the valley.

The OPR also refer to the Ballyman Glen SAC and the potential for disturbance.

The EPA request that they be notified regarding the SEA scoping/screening stage of the draft LAP process.

2.7.1 Policy Recommendations for Draft LAP

The draft LAP area consists predominantly of agricultural lands which are punctuated with treelines and hedgerows, of which, it is acknowledged, have value in term of biodiversity. A Strategic Environmental Assessment (SEA) will be carried out as part of the preparation of the Local Area Plan, to determine any significant impacts on the receiving environment. The proximity of the Ballyman Glen to the development lands is also a factor, and in this respect an Appropriate Assessment (AA) will also be undertaken to determine any significant impacts on this designated area.

With regard to built heritage, the draft LAP will include policies and objectives on built heritage to protect and enhance the local heritage of Old Connaught and will make recommendations on how best to integrate new development in a sensitive and sustainable manner.

2.8 Building Height, Type, Density, and Impact on Views

Several submissions referred to building heights in the LAP area and some expressed opposition to any high-rise development. Some submissions refer to housing type and sizes. A preference for bungalow or two-storey dwellings in short curving closes branching out from feeder roads was expressed.

Several submissions raise concerns regarding the impact of building heights on views and the sylvan character of the area, particularly along Thornhill Road, Ballyman Road and Ballyman Lane (views to the mountains).

A submission refers to housing density and that any buildings and their height should not impede current residents' enjoyment of the locality and the surrounding natural habitat and mature trees.

A submission refers to the draft 'Sustainable and Compact Settlements Guidelines for Planning Authorities - Proposed Policy Approach', the Urban Development and Building Heights Guidelines (2018) and the Design Standards for New Apartments (2022).

A submission queries the density figures provided in the public consultation Issues Paper and urges that the draft LAP ensures that the new development includes a variety of designs and unit sizes, unit types, heights to suit the typography and refers to development suggestions for sites to the south and north of Old Connaught Avenue and on Ferndale Road, Ballyman Road and Thornhill Road.

A further submission indicates that the distribution of development density and height, and development phasing within the LAP, should be cognisant of the future location of the Luas line within the lands, while also taking account of shorter-term infrastructure provision including bus services to serve Old Connaught Avenue.

Another submission suggests maximising the land usage of the land near transport nodes, 'A1' land should be capable of delivering a minimum of 50 units per hectare. Submits that this could rise to 80 units per hectare for land within 200 metres of the proposed Luas station on Old Connaught Avenue.

Prescribed Bodies

The OPR recommend having regard to relevant Section 28 guidelines to the provisions or standards for residential density or building height in the draft LAP.

2.8.1 Policy Recommendations for Draft LAP

The preparation of the draft LAP will have regard to the Dún Laoghaire - Rathdown County Development Plan 2022-2028, regional and national guidance including the relevant Section 28 Government guidelines.

The draft LAP will recommend densities for 'A1' zoned lands within the LAP area, and frameworks will be included illustrating this. In calculating densities and guidance on building height, guidance will be taken from national and local planning documents including the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns and Villages) 2009, the draft 'Sustainable and Compact Settlements, Guidelines for Planning Authorities' 2023, the Urban Development and Building Heights Guidelines 2018, the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2022, and the Dún Laoghaire - Rathdown County Development Plan 2022-2028.

Any new development will need to be designed to respect the established views illustrated on the County Development Plan maps and also, protecting the curtilage of Protected Structures.

2.9 Climate Change and Mitigation

Several submissions were made referring to climate change and mitigation.

One submission indicates that with climate change the biodiversity value of the area needs to be preserved.

Prescribed Bodies

The Department of Environment, Climate and Communications made a submission and request dlr to refer to the Climate Action Act 2021, reference the Climate Action Plan 2023 and indicate that dlr contact the Climate Action Regional Offices. The submission also encourages dlr to examine the potential of district heating including district heating derived from waste heat, where available, technically feasible and cost effective, and commit to carrying out a feasibility exercise and the use of heat mapping in support of same in the draft policies of the LAP.

The Department of Environment, Climate and Communications also refer in their submission to renewable energy, retrofitting, the circular economy and reductions in transport emissions.

The OPR refer to climate change mitigation, the Climate Action Plan 2023 and district heating systems.

The OPW refer to the consideration of climate change impacts.

The NTA refer to the Climate Action Plan and three actions that should inform the LAP, reducing the demand for travel; increasing use of public transport, walking and cycling and a reduction in trips by car; conversion of the transport fleet to zero emissions vehicles.

The Department of Housing, Local Government and Heritage recommend polices for the draft LAP regarding climate change.

The HSE, in relation to climate change, indicate that the risk of extreme heat and resultant health effects in urban areas can be reduced by the appropriate development of green infrastructure.

2.9.1 Policy Recommendations for Draft LAP

During the preparation of the draft LAP, dlr will have regard to the Climate Action Plan 2023, the Dún Laoghaire - Rathdown Climate Action Plan and the Dún Laoghaire - Rathdown County Development Plan 2022-2028 and the relevant Government and regional guidance.

2.10 Rezoning of Land

One submission raises the possibility of extending the A1 zoning objective to the north of Old Connaught to include the lands currently identified as a Strategic Land Reserve.

2.10.1 Policy Recommendations for Draft LAP

In relation to extending the A1 zoning objective, a draft LAP shall be consistent with the objectives of the County Development Plan, its core strategy, and regional spatial and economic strategy that apply to the area of the plan.

2.11 Other Issues Raised in Submissions

Several submissions were received stating that broadband coverage in the area is poor and support the rollout of the National Broadband Plan.

Several submissions raised issues about construction phase impacts.

Prescribed Bodies

The OPR indicate in their submission, that the Planning Act requires the LAP to be consistent with the objectives of the RSES, in addition to the Project Ireland 2040: National Planning Framework (NPF), the SPPRs of Section 28 guidelines and the relevant development plan and its core strategy.

The Department of Environment, Climate and Communications, in their submission, refer to the national digital strategy and NSO 6 of the NDP. They indicate that direct support in the draft Plans of supporting 5G rollout and the National Broadband Plan would be welcome from a policy perspective.

The Geological Survey Ireland in their submission encourage the use of and reference to the GSI datasets. They indicate that this data can add to the content and robustness of the SEA process. They include a list of publicly available datasets useful for the environmental assessment and planning process. They recommend that dlr review the list and refer to any datasets considered relevant to the assessment. The remainder of their submission provides more detail on some of the datasets including, Geoheritage, Groundwater, Geological Mapping, Geohazards, Natural Resources (Minerals/Aggregates) and Geochemistry of soils, surface waters and sediments.

2.11.1 Policy Recommendations for Draft LAP

Dlr will consider all relevant submissions received when proposing policies and objectives for the draft LAP.

