

Ballyogan & Environs

Draft Local Area Plan 2019 - 2025

Chief Executive's Report on Submissions Received
May 2019

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Part 1

Introduction

Introduction

Statutory Background to the Chief Executive's Report

This Chief Executive's Report forms part of the statutory procedure for the preparation of a Local Area Plan (LAP), as required by Section 20(3)(c) of the Planning and Development Act, 2000 (as amended) and sets out to:

- List the persons who made submissions or observations under this Section (i.e. during the public consultation period of the Draft Local Area Plan);
- Summarise the issues raised by the persons in the submissions or observations; and,
- Give the opinion of the Executive to the issues raised, and his or her recommendation in relation to the proposed Local Area Plan, amendment to the Local Area Plan or revocation of a Local Area Plan, as the case may be, taking account of proper planning and sustainable development of the area, the statutory obligations of any Local Authority in the area and any relevant policies or objectives in the area and any relevant policies or objectives of the Government or of any Minister of the Government.

This Report is submitted to the Members of Dún Laoghaire-Rathdown County Council for their consideration as part of the process for the preparation of the Ballyogan and Environs Local Area Plan 2019-2025 (BELAP) and the associated Strategic Environmental Assessment, Appropriate Assessment Screening and Strategic Flood Risk Assessment. Members have a period of up to 6 weeks from the date of receipt to consider the Chief Executive's Report. Following consideration of the Draft Local Area Plan and the Chief Executive's Report, the Members may, by resolution make, amend or revoke the Plan. If the Members decide to materially alter the Draft Local Area Plan a further period of public consultation will be necessary. The material alterations to the Draft Local Area Plan must be advertised, and the proposed material alteration(s) made available for public inspection for a period of not less than 4 weeks. Written submissions or observations, only in respect of the proposed material alteration(s) to the Draft LAP, made to the Planning Authority within the stated period, must be taken into consideration before the making of any alteration.

Strategic Environmental Assessment (SEA)

A Strategic Environmental Assessment (SEA) Environmental Report accompanies the Draft Ballyogan and Environs LAP. SEA is required to be undertaken on LAPs for an area the population or the target population of which is 5,000 persons or more. As the existing population of the Ballyogan and Environs LAP area exceeds this threshold, SEA must be undertaken. This SEA Report should be read in conjunction with the Draft Plan. This Report was placed on public display alongside the Draft Plan and will be updated to take account of any subsequent changes that are made to the Draft Plan.

The recommendations contained in this Report have been examined and it is advised that none would require full SEA to be undertaken. Where proposed material alterations are agreed by the Members, these will be screened for the need to undertake SEA.

Appropriate Assessment (AA)

In accordance with requirements under EU Habitats Directive (92/43/EEC) and Section 177 of the Planning and Development (Amendment) Act 2010, the Draft LAP was screened to assess whether the Plan, alone or in combination with other Plans and projects, was likely to have a significant effect on one or more Natura 2000 sites in view of the sites' conservation objectives. Following screening of the Draft LAP, it was determined that an Appropriate Assessment of the Draft LAP was not required.

The recommendations contained in this Report have been examined and it is advised that none would require AA to be undertaken. Where proposed material alterations are agreed by the Members, these will be screened for the need to undertake AA.

Contents and Format of this Report

Having regard to the provisions of the Planning and Development (Amendment) Act 2010, as amended, Part 2 of this Chief Executive's Report sets out a summary of the submission made by the Office of the Planning Regulator, the Executive's response to the issues raised, and a recommendation in relation to each issue/observation. Part 3 of this Report sets out a summary of the submission made by the National Transport Authority, the Executive's response to the issues raised, and a recommendation in relation to each issue/observation. Part 4 provides a summary of the issues raised in each of the other remaining submissions received, the Executive's response to the issues raised, and a recommendation to each submission/observation.

Where the Executive makes a recommendation to change or amend the Draft LAP these are set out in red type.

To make the document as user friendly as possible the issues raised have been grouped under a series of umbrella 'headings' which are largely based on the various individual Sections and Appendices set out in the Draft Local Area Plan.

Public Consultation

The Draft Ballyogan and Environs LAP 2019-2025, the Strategic Environmental Assessment Report, Appropriate Assessment Screening Report and Strategic Flood Risk Assessment were put on public display on 3rd April 2019. Written submissions and/or observations were invited during a 6-week period ending the 14th of May 2019. During this public consultation period the Council pursued a proactive approach to raise awareness of the Draft LAP among the citizens of the Plan area, and other stakeholders, and by doing so encourage a greater degree of public participation in the overall process. The initiatives and measures undertaken by the Council to engage with citizens and promote more inclusive public participation included:

- Detailed public notices placed in the national press advising of the consultation period, where the Draft LAP could be accessed, and inviting submissions up to and including the closing date of 14th of May 2019. The public notice also advised of 2 no. public information days to be held at the Samuel Beckett Civic Campus during the consultation period.
- The Draft Local Area Plan, Strategic Environmental Assessment Report, Appropriate Assessment Screening Report and Strategic Flood Risk Assessment were on continuous public display for the duration of the consultation period at the following locations:

- The Public Concourse, County Hall, Dún Laoghaire (9.00am-5.00pm) and Council Offices, Dundrum Office Park, Dundrum (9.30am-12.30pm and 1.30pm-4.30pm)
- Two public information days were held in Ballyogan, at the Samuel Beckett Civic Campus on the dates listed below:
 - Tuesday 16th April 2019 from 16:00 to 21:00
 - Thursday 2nd May 2019 from 16:00 to 21:00
- The Draft LAP and all accompanying documents were available to view or download from the Council's website www.dlrco.ie, were made available at libraries in Blackrock, Cabinteely, Dalkey, Deansgrange, DLR Lexicon, Dundrum, Shankill and Stillorgan, both in hard copy and through the free web access facilities available at each library, and were issued to all Prescribed Bodies in accordance with the Planning and Development Act 2000 (as amended).
- Submissions/observations in respect of the Draft LAP, SEA Environmental Report, Appropriate Assessment Screening Report and Strategic Flood Risk Assessment were accommodated through a number of mediums – hard copy, e-mail and through the website via Citizen Space – Online Consultation Hub.

Submissions Received

The Executive would like to take this opportunity to thank everyone who took the time to make a submission to the Draft Local Area Plan, and to particularly thank those who attended the public information sessions, which generated some very interesting discussion.

During the 6-week consultation period a total of 96 no. valid submissions were received by the Planning Authority. Part 5 of this Report lists those individuals/agencies/groups making submissions. Each submission has been allocated a unique reference number.

Part 2

Summary of Submission by the Office of the Planning Regulator and the Executive's Response and Recommendation

2. Submission by the Office of the Planning Regulator

Key Issue	Sub. No.	Executive's Response & Recommendation
<p>i. The submission by the Office of the Planning Regulator (OPR) makes 4 no. recommendations for inclusion in the finalised LAP.</p> <p>1. The forthcoming adoption of the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Regional Assembly area will shortly trigger a State-wide requirement for Local Authorities to undertake a review of their City/County Development Plans in order to determine consistency with the RSES. By variation to or review, County Development Plans could in turn prompt a subsequent review of Local Area Plans to ensure consistency with the varied / new 'parent' County Development Plan. The OPR recommends the insertion of a written objective to the effect of the above in the finalised BELAP.</p> <p>2. The Draft LAP indicates, in broad terms, a potential delivery of c. 4,300 new homes in the BELAP area. The OPR recommends this should be broken down in more detail on a site/area basis. The OPR recommends a summary table indicating the estimated housing yield for the substantial sites identified in the LAP.</p> <p>3. Timely delivery of required infrastructure and amenities is critical in ensuring that development proceeds in a planned manner and that longer-term infrastructural deficits are avoided or mitigated. The OPR recommends inclusion of an overall 'Implementation and Infrastructural Delivery Schedule'.</p> <p>4. The OPR recommends that the conclusions and requirements of the Strategic Flood Risk Assessment should be more clearly integrated with the written statement of the LAP.</p>	<p>Bo70</p>	<p>The Executive notes the content of the submission.</p> <p>In relation to recommendation 1, a written objective as requested will be inserted into the Final LAP.</p> <p>In relation to recommendation 2, a summary table as requested will be inserted into the Final LAP.</p> <p>In relation to recommendation 3, the Plan area is currently well served in relation to the quantum and distribution of strategic hard infrastructure. The Sandyford High Level Water Supply Scheme – completed in 2011 – guarantees security and resilience in relation to future water supply not just for the Plan area but the wider environs – including Sandyford Business District and the evolving Kiltarnan-Glenamuck area. The major trunk sewer laid from Kilgobbin Road to the Carrickmines Interchange, and ultimately draining via Cherrywood to the Shanganagh Wastewater Treatment Plant has, unlike Ringsend, considerable surplus treatment capacity. It is acknowledged more local upgrades may be necessary as significant sites are opened up, but any such works will essentially be developer-led.</p> <p>The Plan area is traversed by the M50 corridor and 'bookended' at its western and eastern ends by Junction 14 (Leopardstown) and Junction 15 (Carrickmines). The two junctions are directly connected by the Ballyogan Road/Murphystown Way District Distributor Road corridor which was fundamentally and radically upgraded in tandem with the construction works of the Luas Green Line B1 Extension Project, connecting Sandyford and Cherrywood. All junctions along the upgraded corridor are signalised (and synchronised to the parallel Luas signalling system) and the corridor incorporates both cycle lanes and left and right hand turning lanes. Any supplementary local roads/cycling/pedestrian infrastructure necessary to open up and advance undeveloped lands will be developer-led.</p> <p>In early April 2019 Transport Infrastructure Ireland confirmed to DLR that the Luas Green Line Enhancement Project to incrementally increase capacity on the Green Line network through a combination of higher frequencies, additional trams and larger rolling stock is currently in train. Phase 1 – to be completed by 2021 – will see current peak Luas capacity (c. 6,408 passengers) increased to c. 8,813 passengers per hour (38% increase). Phase 2 will see further interventions that will enhance capacity to c.11,016 passengers (72% increase on current peak capacity). Phase 3 (post 2039) involves the Green Line being upgraded to MetroLink providing capacity of up to c. 18,000 passengers per hour per direction. In terms of transportation policy, the submission received from the NTA acknowledged the consistency of the Draft Plan with the 'Transport Strategy for the Greater Dublin Area 2016-2035', stating their support for the transport policies and objectives contained in the Plan:</p> <p><i>'The NTA is supportive of the transport policies and objectives contained in the Draft LAP as they are consistent with the Transport Strategy for the Greater Dublin Area 2016-2035 ('the Transport Strategy'); in particular, the LAP accords with the 'Strategic Planning Principles' and 'Local Planning Principles' set out in Section 7 of the Transport Strategy...which recommended that:</i></p> <ul style="list-style-type: none"> • <i>Public transport should be the primary focus of the LAP for journeys to adjacent areas;</i>

Key Issue	Sub. No.	Executive's Response & Recommendation
		<ul style="list-style-type: none"> • <i>Public transport accessibility should be a key determinant of the location and density of new development;</i> • <i>The LAP should support the use of walking and cycling for trip-making at the local level; and</i> • <i>There should be a high degree of permeability for walking and cycling within the LAP area, and strong walking and cycling links to adjacent areas, including public transport stations/stops and District, Neighbourhood and Local Centres.'</i> <p>In relation to community/sports facilities Phase 1 of the Samuel Beckett Civic Campus (opened in 2016) provides an obvious focus for community activity right in the heart of the Plan area, and readily accessible to the Luas Green Line. Facilities provided in Phase 1 of the Samuel Beckett Civic Campus include a community centre, creche and leisure facilities (including a gym), and outdoor spaces consisting of grass and synthetic sports pitches, a children's playground and skate area. DLR has committed an additional €37 million to Phase 2 of the Civic Campus in its Three Year Capital Programme. Phase 2 will deliver further high quality facilities including: a new sports building with swimming pool; an events area within the re-landscaped civic space; a park connecting the playing pitches, with viewing benches and spectator areas; a library and communities building; and a two-storey car park. Construction of Phase 2 is scheduled to commence Q3/Q4 2019.</p> <p>From an open space and recreational perspective Fernhill Park and Gardens – purchased by DLR in 2014 – was recently opened full time to the public in March 2019. This is the first new park of its kind in the County since DLR came into being in 1996. The Park extends to 34 hectares and comprises a high quality sustainable regional public park.</p> <p>On foot of EPA License obligations, the Council is committed to repurposing the former Ballyogan Landfill as a new 62 hectare public park (Jamestown Park). Remediation works have now largely been completed. A Masterplan is currently being prepared for Jamestown Park which will allow the lands to be developed on an incremental basis as a recreational facility that will offer significant passive and recreational opportunities for the community still evolving in the BELAP and environs area. As a precursor, DLR Parks Department have committed to a major tree planting of native species across key areas of the park in the 2019/2020 planting season.</p> <p>In addition, a 5.2 hectare Eco-Park was included in the Clay Farm Phase 1 planning permission granted by An Bord Pleanála (Ref. 246601) in September 2016. The Eco-Park located in the valley of the Ballyogan Stream will include a range of passive, casual and semi-active recreation spaces and will act as a local park for the wider community, linking to the planned Jamestown Park immediately to the south-east. On foot of a condition attached to the Board Decision, laying out and construction of the Eco-Park is currently underway. On completion of the works the Eco-Park will be publicly accessible.</p> <p>The recent grant of two Strategic Housing Developments in the Plan area by An Bord Pleanála – 927 no. units at Clay Farm Phase 2 in August 2018 (ABP Ref. 301522) and 341 no. units at Glencairn in December 2018 (ABP Ref. 302580) – is perhaps testament to the fact that the underlying physical infrastructure in the area has more than adequate capacity to support development proposals of this scale. It is noted the National Transport Authority submission in respect of the Clay Farm Phase 2 SHD Application '<i>...welcomed the principle of more residential</i></p>

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		<p><i>development in a location served by Luas'. In their assessment of the Clay Farm Phase 2 Application the Board Inspector stated, 'The location of the site on a public transport corridor within the built up area of the city means that it has relatively good access to social and commercial services and to places of employment by sustainable transport modes. Limiting residential development on the site would not reduce the demand for housing in the city, but it would displace the demand to other areas with poorer access by sustainable transport modes. The consequence of such restrictions would therefore tend to increase travel by private car and thus worsen traffic congestion.'</i></p> <p>In essence, the remaining residual capacity in the Plan area relates primarily to Kilgobbin and Racecourse South – the two sites for which Site Development Frameworks have been prepared and which have an estimated combined development capacity of c. 1,750 no. units. Both sites share the same context and characteristics of the Clay Farm and Glencairn SHD sites; both are fully serviced in terms of water infrastructure; both are juxtaposed to the Luas Green Line; and both rely on Junctions 14 and 15 to facilitate movements across the M50 corridor. In conclusion, given: the substantial residual infrastructure capacity in the Plan area; that the remaining localised supplementary infrastructural interventions will be developer-led; TII's commitment to enhance capacity on the Luas Green Line; that only two significant parcels of residentially zoned land remain to be developed; and, that the parcels in question share the same characteristics and contextual underpinnings as the recently granted Clay Farm and Glencairn sites; it is considered that a comprehensive and all-encompassing phasing plan is unnecessary.</p> <p>Notwithstanding, it is considered appropriate to insert a Phasing Plan into the Final LAP that focusses on outstanding strategic infrastructural upgrades required to facilitate development at the two major land parcels in the BELAP area, Racecourse South and Kilgobbin. The Phasing Plan will seek to ensure infrastructure and services are available to serve new communities and that flexibility within a clear set of parameters is provided so that the requirements of both the relevant agencies and the new communities are balanced. In addition, it is also recommended that Policy BELAP COM4 is added to, to reflect phasing requirements with regards to school provision in the BELAP area.</p> <p>Given its complexity and highly technical content the standard practice in relation to Strategic Flood Risk Assessments (SFRA) prepared for statutory County Development and Local Area Plans is to include the SFRA as a 'standalone' appendix. This does not, in any way, diminish nor dilute the obligations or imperatives associated with Flood Risk Management – it simply packages them in a single cohesive navigable document. It is highlighted that Draft Plan Policy BELAP S110 – Flood Risk Assessment, is already specifically cross-referenced in both the Draft Plan and the SFRA. To restate the comprehensive and detailed flood policy guidance contained in the SFRA in the LAP is considered to be unnecessary duplication. It is further considered that any potential surmising of the quite specific and detailed content of the SFRA into the LAP could lead to potential inconsistencies in the interpretation of flood management guidance, undermining the rationale for the preparation of a standalone detailed SFRA.</p> <p>Notwithstanding, it is recommended that additional text is added to Section 10.1.4 of the Draft Plan '<i>Flood Risk</i>' that specifically cross-references Section 1.9 of the SFRA '<i>Flood Risk Management – Policy Response</i>', and the requirement for (i) an appropriately detailed flood risk assessment to be required in support of all planning applications, and (ii) that the level of detail required will vary depending on the risks identified and the proposed land use. The inclusion of said text is considered appropriate given its applicability to all new planning applications</p>

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		<p>in the BELAP area.</p> <p>Recommendation Amend the Draft Plan as follows:</p> <p>Page 9 – Section 2.4.2 - Add the following text at the end of the Section:</p> <p style="color: red;">It should be noted that, subsequent to the adoption of the Eastern and Midlands Regional Assembly's Regional Spatial and Economic Strategy (RSES), Dún Laoghaire-Rathdown Country Council will be required to review the current 2016-2022 County Development Plan to determine whether it is consistent with the RSES and commence any variation or new County Development Plan (as appropriate) to ensure consistency and alignment. In turn, such a variation or new County Development Plan (as appropriate) may prompt a subsequent review of Local Area Plans to ensure consistency with the 'parent' County Development Plan.</p> <p>Page 21 - Section 5.1.2 Capacity for Additional Population Growth – Add the following Summary Table:</p> <table border="1" data-bbox="1077 703 2002 1034"> <thead> <tr> <th style="color: red;">Development Site</th> <th style="color: red;">No. of Residential Units*</th> </tr> </thead> <tbody> <tr> <td>Racecourse South SDF</td> <td style="text-align: right;">950</td> </tr> <tr> <td>Kilgobbin SDF</td> <td style="text-align: right;">800</td> </tr> <tr> <td>Clay Farm Phase 1 (nearing completion)</td> <td style="text-align: right;">400</td> </tr> <tr> <td>Clay Farm Phase 2 (under construction)</td> <td style="text-align: right;">900</td> </tr> <tr> <td>The Park, Carrickmines</td> <td style="text-align: right;">130</td> </tr> <tr> <td>Glencairn North - east of the Luas (SHD Granted)</td> <td style="text-align: right;">340</td> </tr> <tr> <td>Glencairn North - west of the Luas</td> <td style="text-align: right;">180</td> </tr> <tr> <td>Stepaside Park (nearing completion)</td> <td style="text-align: right;">50</td> </tr> <tr> <td>Golf Lane</td> <td style="text-align: right;">400</td> </tr> <tr> <td>DLR Housing Scheme - Ballyogan</td> <td style="text-align: right;">120</td> </tr> <tr> <td>Total</td> <td style="text-align: right;">4,270</td> </tr> </tbody> </table> <p style="color: red;">* Note: The figures set out in the Table above are estimated / approximated</p> <p>Page 51 - Amend guiding principle 'Phasing' for Racecourse South Site Development Framework as follows:</p> <p>Development at the site must occur in tandem with the delivery of key infrastructure and linkages identified in this LAP. The Masterplan for this SDF area shall be accompanied by a comprehensive phasing plan that aligns with this principle (see detailed phasing set out in Section 12.1). It is envisaged that the eastern portion of the site and the public open space could be delivered in initial phases. with development of the western portion being permissible only when this key infrastructure and linkages has been delivered.</p> <p>Page 54 – Add the following text to guiding principle 'Phasing' for Kilgobbin Site Development Framework as follows:</p>	Development Site	No. of Residential Units*	Racecourse South SDF	950	Kilgobbin SDF	800	Clay Farm Phase 1 (nearing completion)	400	Clay Farm Phase 2 (under construction)	900	The Park, Carrickmines	130	Glencairn North - east of the Luas (SHD Granted)	340	Glencairn North - west of the Luas	180	Stepaside Park (nearing completion)	50	Golf Lane	400	DLR Housing Scheme - Ballyogan	120	Total	4,270
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		<p>Development within the SDF area is contingent on commitment to the completion of the Loop Road and key pedestrian and cyclist linkages (see detailed phasing set out in Section 12.1).</p> <p>Add additional page - Page 56 – Insert a new Section 12.1 'Phasing':</p> <p>12.1 Phasing</p> <p>This phasing Section is to ensure infrastructure and services are available to serve new communities. Flexibility within a clear set of parameters is provided so that the requirements of both the relevant agencies and the new communities are balanced.</p> <p>Racecourse South Site Development Framework</p> <table border="1" data-bbox="1034 596 2045 943"> <tr> <td data-bbox="1034 596 1211 703">Public Transport</td> <td data-bbox="1211 596 2045 703">As part of the preparation of the Masterplan for Racecourse South the Planning Authority with the landowner/developer will enter discussions with the relevant transport agency to agree the phasing of the delivery of homes with the opening of the Luas stop. Any planning application shall demonstrate that the proposal accords with the agreement.</td> </tr> <tr> <td data-bbox="1034 703 1211 863">Linkages</td> <td data-bbox="1211 703 2045 863">As part of the preparation of the Masterplan for the Racecourse South lands the Planning Authority with the landowner/developer will engage with the relevant transport agency regarding the appropriate location for a pedestrian and cycle crossing of the M50. The Masterplan shall accommodate the proposed structure in its design and layout of the new community and public realm. A funding model will be developed to deliver the infrastructure.</td> </tr> <tr> <td data-bbox="1034 863 1211 943">Education</td> <td data-bbox="1211 863 2045 943">The landowner/developer shall enter discussions with the Department of Education and Skills prior to entering pre-planning with the Planning Authority to agree phasing for the delivery of the school.</td> </tr> </table> <p>Kilgobbin Site Development Framework</p> <table border="1" data-bbox="1034 995 2045 1209"> <tr> <td data-bbox="1034 995 1211 1129">Access</td> <td data-bbox="1211 995 2045 1129">The Kilgobbin lands will be served by the Clay Farm Loop Road. To progress the development of these lands the Loop Road will either be in place, with the necessary legal agreements in place for the developer to access the route, or the Applicant shall provide evidence that the Loop Road will be available to serve the development as homes are completed.</td> </tr> <tr> <td data-bbox="1034 1129 1211 1209">Education</td> <td data-bbox="1211 1129 2045 1209">The landowner/developer shall enter discussions with the Department of Education and Skills prior to entering pre-planning with the Planning Authority to agree phasing for the delivery of the school.</td> </tr> </table> <p>Page 38 - Section 8.3.2. – Add the following text to Policy BELAP COM₄ – School Provision:</p> <p>Policy BELAP COM₄ – School Provision: To continue to work with the Department of Education and Skills to ensure the timely delivery of Primary and Post-Primary schools in the BELAP area. Three school sites have been identified within the BELAP area at Kilgobbin South, Glencairn North, and Racecourse South as shown on Figure 11.1. The</p>	Public Transport	As part of the preparation of the Masterplan for Racecourse South the Planning Authority with the landowner/developer will enter discussions with the relevant transport agency to agree the phasing of the delivery of homes with the opening of the Luas stop. Any planning application shall demonstrate that the proposal accords with the agreement.	Linkages	As part of the preparation of the Masterplan for the Racecourse South lands the Planning Authority with the landowner/developer will engage with the relevant transport agency regarding the appropriate location for a pedestrian and cycle crossing of the M50. The Masterplan shall accommodate the proposed structure in its design and layout of the new community and public realm. A funding model will be developed to deliver the infrastructure.	Education	The landowner/developer shall enter discussions with the Department of Education and Skills prior to entering pre-planning with the Planning Authority to agree phasing for the delivery of the school.	Access	The Kilgobbin lands will be served by the Clay Farm Loop Road. To progress the development of these lands the Loop Road will either be in place, with the necessary legal agreements in place for the developer to access the route, or the Applicant shall provide evidence that the Loop Road will be available to serve the development as homes are completed.	Education	The landowner/developer shall enter discussions with the Department of Education and Skills prior to entering pre-planning with the Planning Authority to agree phasing for the delivery of the school.
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Key Issue	Sub. No.	Executive's Response & Recommendation
		<p>landowner/developers of these sites shall enter discussions with the Department of Education and Skills prior to entering pre-planning with the Planning Authority to agree phasing for the delivery of the school.</p> <p>Page 46 - Section 10.1.4 Flood Risk – remove the last sentence and replace with:</p> <p>The detailed technical appraisal of flood risk in the Plan area, and the associated mapping, is set out in the Strategic Flood Risk Assessment (SFRA), which accompanies this Local Area Plan as a standalone Appendix. Section 1.9 – Flood Risk Management – Policy Response, in that Appendix, sets out clearly that an appropriately detailed flood risk assessment will be required in support of all planning applications. The level of detail required will vary depending on the risks identified and the proposed land use.</p>

Part 3

Summary of Submission by the National Transport Authority and the Executive's Response and Recommendation

3. Submission by the National Transport Authority

Key Issue	Sub. No.	Executive's Response & Recommendation
<p>i. The NTA is supportive of the transport policies and objectives contained in the Draft Plan as they are consistent with the 'Transport Strategy for the Greater Dublin Area 2016-2035'. In particular the LAP accords with the 'Strategic Planning Principles' and 'Local Planning Principles' set out in Section 7 of the Transport Strategy for the Greater Dublin Area. These principles were reflected in the NTA's submission to the Pre-Draft Issues Paper which recommended that:</p> <ul style="list-style-type: none"> • Public transport should be the primary focus of the LAP for journeys to adjacent areas; • Public transport accessibility should be a key determinant of the location and density of new development; • The LAP should support walking and cycling for trip-making at the local level; and • There should be a high degree of permeability for walking and cycling within the LAP area, and strong walking and cycling links to adjacent areas, including public transport stops and District, Neighbourhood and Local Centres. 	B095	<p>The Executive very much welcomes the support and endorsement of the NTA for the transport strategy set out in the Draft Plan, with its emphasis on the provision of permeability, accessibility and linkages to encourage modal shift towards walking, cycling and public transport.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>ii. The NTA recommends that Ballyogan Road should be included in the proposed cycle network as this forms part of the Secondary Route 11C in the NTA's 'Greater Dublin Area Cycle Network Plan' (2013).</p>	B095	<p>The Executive agrees with this submission.</p> <p>Recommendation Amend the Draft Plan as follows:</p> <p>Incorporate existing cycle route on the Ballyogan Road corridor in Table 4.6 and Figure 4.11 of the Draft Plan.</p>

Part 4

Summary of Submissions and the Executive's Response and Recommendation

4. Transport and Movement

Key Issue	Sub. No.	Executive's Response & Recommendation
<p>i. The submission by Transport Infrastructure Ireland (TII) stresses the Authority's key focus is the safeguarding of the strategic capacity and safety of the national roads network. The submission notes the BELAP area is traversed by the M50 mainline and bookended by its Junction 14 (north) and Junction 15 (south).</p> <p>The submission comments that given the intended quantum of development envisaged in BELAP, the Kiltiernan-Glenamuck area and Cherrywood, the Authority anticipates impacts on the national road and light rail networks. TII states this was highlighted in the Authority's Pre-Draft submission (May 2018) which also noted the poor linkages from the area to environs north of the M50, low densities of pedestrian and cyclist facilities in the area, and that the LAP should be consistent with the NTA's 'Transport Strategy for the Greater Dublin Area 2016-2035'.</p> <p>TII identifies a number of critical matters which need to be resolved prior to the adoption of the Final LAP:</p> <ul style="list-style-type: none"> The M50 is now at a stage where relatively minor increases in traffic volumes result in significant impacts in terms of congestion on the mainline. The M50 must be highlighted as strategic infrastructure which needs to be protected and not just portrayed as a barrier to LAP development, as indicated throughout the Draft LAP. The TII notes the absence of any transportation and mobility assessment of the LAP area especially with regard to the Ballyogan and Carrickmines Quarters. The absence of such an assessment is a serious oversight. An appropriate transport assessment would have included for evidence-based improvements for pedestrian and cyclist permeability, appropriate control of vehicular access (not reliant on Junctions 14 and 15) and parking control measures in specific areas. Concern over reliance on the use of Junction 15 for vehicular access to service the Racecourse South lands. TII concludes that unlocking the development potential of lands to the north of the M50 (Racecourse South) is not resolved by the Draft LAP and is premature in advance of an Area Based Transport Assessment. 	<p>B014</p>	<p><u>(i) Zoning and Development</u> Much of the BELAP area has been zoned residential since 1993. The Kilgobbin and Stepside Quarters and the Belarmine/Aikens Village lands to the west of Kilgobbin Road were rezoned from agriculture to residential in 1998, more than 21 years ago. The majority of the Stepside, Ballyogan, Carrickmines and Glencairn Quarters have been developed incrementally over the last 20-25 years or so, as have the Belarmine/Aikens Village lands west of the Kilgobbin Road. The development of the Clay Farm lands is now well in train and An Bord Pleanála recently (December 2018) granted a SHD planning permission for significant residential development on the attendant grounds of Glencairn House (ABP Ref. 302580). In effect the only two residential development parcels of scale still to be developed in the BELAP area are Racecourse South and Kilgobbin – development of which will be informed by the respective Site Development Frameworks set out in Section 12 of the Draft Plan.</p> <p><u>(ii) State / Public Investment</u> Over the last two decades significant state/public infrastructural funding and resources have been invested in the BELAP and Stepside area to unlock the significant residential development potential of these lands, including:</p> <ul style="list-style-type: none"> The South Eastern Motorway – the final piece of the M50 corridor. The Luas Line B1 – Extension from Sandyford to Cherrywood. The Ballyogan Road/Murphystown Road Improvement Schemes – from Junction 14 to Junction 15. The Sandyford High Level Water Supply Scheme providing water capacity and resilience. Major trunk sewer from Lambs Cross to Junction 15 to carry foul drainage to Shanganagh Waste Water Treatment Plant. <p><u>(iii) Poor Linkages from the area to North of the M50 / Barrier Effect of the M50 Corridor</u> The TII references to '...poor linkages from the area to environs north of the M50', are quite simply, the consequence of (i) the barrier effect of the M50 corridor itself, and (ii) that the only direct connections across the M50 from the Ballyogan/Stepside area are at Junctions 14 and 15, where vehicular traffic moving north and south across the corridor are obliged to mix with traffic movements going on to, or coming off, the motorway – there are currently no other alternatives. It is for this very reason that the referenced 'M50 crossings' and 6-year 'M50 Parallel Roads' proposals were incorporated into the 2016-2022 County Development Plan. Likewise, the Kiltiernan Link Road, proposed under the Cherrywood Planning Scheme will provide a direct link from the Carrickmines Quarter to Cherrywood – and subsequently onwards to the N11 – circumventing the need for north-south traffic to pass through Junction 15.</p> <p>The suggestion that the M50 corridor does not represent a barrier to vehicular/pedestrian/cycle movements in the Plan area misrepresents the reality. The National Roads Authority, the precursor to the TII, were the agency charged with advancing the M50 orbital motorway project. The potential community severance issues likely to arise were flagged as long ago as 1997 in the South Eastern Motorway Environmental Impact Statement, which indicated 'Moderate' community severance for 'Ballyogan Road to Glenamuck Road North' and 'Glenamuck Road (north to south)'.</p> <p>Finally, the POWSCAR dataset, which derives from the CSO five yearly Census, provides detailed information about</p>

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		<p>patterns of work and school/college commuting between specific locations. The two largest places of work for people living in the BELAP area are Dublin City South and Sandyford Business District with other significant numbers working at centres throughout DLR and within the BELAP boundary itself. Somewhat contrary to the picture portrayed in the TII submission POWSCAR demonstrates there are notably few commuting journeys originating from the BELAP area going to locations along the M50 corridor.</p> <p><u>(iv) Need for Traffic Assessment</u> An Bord Pleanála recently granted (August 2018) Strategic Housing Development planning permission for 927 no. residential units on the second phase of the Clay Farm development, immediately south of the Ballyogan Road (ABP Ref. 301522). The Board Inspector's Report on the application stated that the submission from the National Transport Authority '...welcomed the principle of more development in a location served by the Luas'. The submission from TII re-iterated much of the narrative in the current submission to the Draft BELAP – safeguarding the strategic function of the national roads network and insufficient data submitted to demonstrate the proposed development will not have a detrimental impact on the capacity, safety and operation of the M50 and light rail network.</p> <p>In their assessment of the Clay Farm Application, the An Bord Pleanála Inspector stated '<i>The location of the site on a public transport corridor within the built up area of the city means that it has relatively good access to social and commercial services and to places of employment by sustainable transport modes. Limiting residential development on the site would not reduce the demand for housing in the city, but it would displace the demand to other areas with poorer access by sustainable transport modes. The consequence of such restrictions would therefore tend to increase travel by private car and thus worsen traffic congestion... In these circumstances, it is unlikely that the further assessment sought by TII would significantly assist consideration of the current application.</i>'</p> <p>The last two significant residential development parcels in the BELAP area – Racecourse South and the Kilgobbin lands (immediately west of Clay Farm) – have many of the characteristics of the Clay Farm scheme referenced – fully serviced, immediately abutting the Luas corridor, and the reliance on Junctions 14 and 15 to facilitate north-south movements across that corridor.</p> <p><u>(v) Eastern and Midlands Region – Regional Spatial and Economic Strategy</u> The EMRA Regional Spatial and Economic Strategy (RSES) was agreed (subject to proposed material amendments) by the Regional Assembly in March 2019. The Dublin Metropolitan Area Strategic Plan (MASP) is a vision for the future growth of the Metropolitan area and identifies strategic corridors based on their capacity to achieve compact sustainable and sequential growth along key public transport corridors, existing and planned. The MetroLink corridor – comprising MetroLink and an enhanced Luas Green Line - identifies specific growth areas including, '<i>New and emerging mixed use districts at Cherrywood and Sandyford and new residential communities at Ballyogan and Environs and Kliternan-Glenamuck</i>'. Advancing the build-out of the residual, residential development lands would consequently be fully in accordance with and supported by the stated objectives of the Regional Spatial and Economic Strategy.</p> <p><u>(vi) National Transport Authority</u> In its submission, which references the earlier BELAP Pre-Draft consultation process, TII stated that the BELAP</p>

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		<p>should be consistent with the NTA 'Transport Strategy for the Greater Dublin Area 2016-2035'. In its current submission to the Draft LAP the National Transport Authority states the following:</p> <p><i>'The NTA is supportive of the transport policies and objectives contained in the Draft LAP as they are consistent with the Transport Strategy for the Greater Dublin Area 2016-2035 ('the Transport Strategy'); in particular, the LAP accords with the 'Strategic Planning Principles' and 'Local Planning Principles' set out in Section 7 of the Transport Strategy...which recommended that:</i></p> <ul style="list-style-type: none"> • <i>Public transport should be the primary focus of the LAP for journeys to adjacent areas;</i> • <i>Public transport accessibility should be a key determinant of the location and density of new development;</i> • <i>The LAP should support the use of walking and cycling for trip-making at the local level; and</i> • <i>There should be a high degree of permeability for walking and cycling within the LAP area, and strong walking and cycling links to adjacent areas, including public transport stations/stops and District, Neighbourhood and Local Centres.'</i> <p>Recommendation No change to the Draft Plan.</p>
<p>ii. Inadequate parking is being provided in new developments leading to car parking in surrounding estates.</p>	<p>B073</p>	<p>With regards to the appropriate quantum of car parking, this is a Development Management process, and all proposals for development are assessed against the parking standards set out in the County Development Plan and/or national guidelines.</p> <p>Recommendation No change to the Draft Plan</p>
<p>4.1.2. Public Transport</p>		
<p>i. A number of submissions raise concerns relating to the capacity of the Luas.</p> <p>The recent revisions to NTA's MetroLink plans – to now terminate at Charlemont as opposed to Sandyford as originally proposed – calls into question the capacity of the Luas Green Line to facilitate the significant anticipated population growth in the BELAP plan area.</p>	<p>B001 B004 B013 B032 B040 B050 B051 B067 B073</p>	<p>The recently announced (March 2019) decision to terminate the current phase of MetroLink at Charlemont has precipitated further focus on the requirement to expedite and accelerate the delivery of the Luas Green Line Enhancement Scheme – aimed at incrementally increasing overall capacity in the network through a combination of larger rolling stock and increased frequencies during the am and pm peak periods.</p> <p>At a recent presentation to DLR Officials by Transport Infrastructure Ireland (TII) it was advised that the current maximum carrying capacity in the morning peak is c. 6,408 passenger demand per direction per hour (ppdph).</p> <p>Phase 1 of the Green Line Enhancement Scheme involves extending the existing twenty six 43-metre-long trams to 55 metres in length and the delivery of an additional eight new 55 metre trams to the Green Line fleet. The new trams are already on order and it is anticipated this phase of enhancement will be completed by 2021 and provide carrying capacity of c. 8,800 passengers per hour. Phase 2 of the Enhancement Scheme involves operating 30 no. 55 metre trams per hour (in each direction) – one every two minutes – which will increase carrying capacity to c. 11,000 ppdph. Phase 3 (post 2039) will see the Luas Green Line upgraded to MetroLink providing a carrying capacity of up</p>

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		<p>to 18,000 ppph. TII have advised that the Green Line Enhancement Project is currently in train and is being advanced as a separate project.</p> <p>In addition to the above, it is important to acknowledge that the Luas Green Line is not the only public transport option available to serve the BELAP area as it develops and grows. As the area evolves the National Transport Authority will be required to expand and improve the quantum, frequency and number of bus routes serving the area.</p> <p>Recommendation In light of the recent MetroLink proposals, amend the Draft LAP as follows:</p> <p>Page 16 - Amend Section 4.3.2 Policy BELAP MOV7 – Public Transport Improvements to read:</p> <p>Policy BELAP MOV7 - To support and promote any and all improvements to capacity and service levels on the Luas Green Line corridor, including the delivery, in time, of the provision of a Metro grade service from Dublin Airport via the City Centre to Sandyford, and to support and promote any and all improvements to bus services and routing serving the area.</p>
<p>ii. Submission states it is not clear to what extent the Plan has been informed by the current BusConnects project. Acknowledges BusConnects is still at consultation stage.</p> <p>Submission highlights existing and planned bus service provision will not be sufficient to support increased population.</p>	<p>Bo13 Bo67</p>	<p>BusConnects is an iterative process that has still to be concluded. Many of the original proposals put on public consultation generated significant public criticism and opposition. A second round of public consultation is, at the time of writing, currently in train. The NTA have advised that a third round of public consultation is likely in September/October of this calendar year.</p> <p>As the final outcomes of the overall BusConnects process are still to be crystallised it would have been premature, speculative and ill-considered for the Draft LAP to have factored in a BusConnects component. The current iteration of BusConnects does not propose any key bus corridors serving the BELAP area. Given that the BELAP area is currently traversed by the Luas Green Line, this is not unexpected. Notwithstanding it is important to acknowledge that the Luas Green Line is not the only public transport option available to serve the BELAP area as it develops and grows. As the area evolves it will be incumbent on the NTA to expand and improve the quantum, frequency and number of bus routes serving the area.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>4.1.3. Roads Network</p>		
<p>i. Proposes consideration should be given to re-opening the 'Old' Murphystown Road to vehicular traffic on a one-way system from Kilgobbin Road to Glencairn to alleviate local traffic congestion.</p>	<p>Bo03</p>	<p>Prior to the construction of the South Eastern Motorway section of the M50, and the associated Murphystown Way, the principle vehicular route from Ballyogan/Stepaside towards Leopardstown Road and the (then) Sandyford Industrial Estate, involved traversing Murphystown Road – effectively a single carriageway estate road with a single footpath fronting c. 60 semi-detached dwellings on the eastern edge of the Mount Eagle development. Each of</p>

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		<p>these houses have on-curtilage driveways. At its southern end, close to its junction with Kilgobbin Road the geometry of Murphystown Road was completely substandard with no footpath whatsoever – as a consequence of a 'pinch point' between a long-established industrial premise to the west, and a notable Protected Structure (Lisieux House) to the east. The culmination of localised traffic movements into and out of driveways and unsignalised junctions at the end of Murphystown Road resulted in significant northbound congestion during the AM peak period and southbound congestion in the PM peak period.</p> <p>The Part VIII for the Murphystown Road Improvement Scheme (Murphystown Way) – a joint TII/DLR project was applied for in 2007 and the new 1 kilometre road connecting Ballyogan Road directly to Junction 14 of the M50 was finally completed in late 2010. Murphystown Way is a largely 'segregated' route with footpaths and cycleways, three signalised junctions (with dedicated left and right turn lanes) and a signalised pedestrian crossing at the Glencairn Luas Stop.</p> <p>On completion of the combined Murphystown Way / Luas Green Line Extension project both the southern and northern ends of the 'old' Murphystown Road were cul-de-sac'ed. The original 'pinch point' at Lisieux House remains. There are no proposals for re-opening Murphystown Way as posited in the submission.</p> <p>Recommendation No change to the Draft Plan.</p>
ii. Queries when the ESB Link Road to Sandyford Business District is to be constructed.	Bo04	<p>Sandyford Business District lies outside the BELAP area boundary. The issue of the ESB Link Road cannot, therefore, be addressed through the BELAP plan process.</p> <p>Recommendation No change to the Draft Plan.</p>
iii. Submissions highlight concerns regarding the functioning of Junction 15 of the M50. Submission comments on the heavy traffic using the southern roundabout at Junction 15 (Carrickmines Interchange) at the junction of Glenamuck Road and Ballyogan Road. Submission proposes signalising this roundabout as a safety measure.	Bo05 Bo72	<p>Both the M50 corridor and the Carrickmines Interchange are under the operational control of Transport Infrastructure Ireland (TII). Any proposal, or otherwise, to introduce signalisation on Junction 15 would be an operational decision for TII to make and is not a Local Area Plan issue.</p> <p>Recommendation No change to the Draft Plan.</p>
iv. Requests the provision of a pedestrian crossing on Ballyogan Avenue between the Leopardstown Valley Shopping Centre and Drinaghmore Close.	Bo06	<p>This is considered to be a local operational matter and not a Local Area Plan issue.</p> <p>Recommendation No change to the Draft Plan.</p>
v. Submission comments that the Glenamuck and Kilgobbin Roads were not built to cater for the volume of traffic expected by new residents using these routes.	Bo61	<p>Policy BELAP Mov12 – New Linkages: '<i>To provide or facilitate the delivery of the new linkages shown in Table 4.6 and Figure 4.11</i>' identifies a whole suite of new linkages – road, pedestrian and cycle – aimed at significantly improving connectivity/permeability both within the Plan area and to adjacent lands. Specific reference is made to Link no's 17</p>

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		<p>and 18 included in the Draft Plan that support the delivery of the Glenamuck District Distributor Road and the Glenamuck Link Distributor Road. Both of these roads would have a significant impact on the functioning of the existing Glenamuck Road and on the distribution of traffic both in the southern neighbourhoods of the Plan area and the wider network.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>vi. Submission references increases in traffic congestion and difficulties and delays exiting the Ballyogan estate onto Ballyogan Road as a consequence of car parking both sides of Ballyogan Avenue. The issue has been exacerbated by the development of the Samuel Beckett Civic Campus and new Gaelscoil and will be further exacerbated by the Council's proposed social housing development at Ballyogan Grove.</p>	Bo63	<p>Both junctions from Ballyogan Avenue onto Ballyogan Road are signal controlled. Finessing the signalling sequencing and introducing more robust parking interventions in the Ballyogan estate are operational matters that cannot be addressed through the LAP process.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>vii. Submission states significant level of support from residents in Belarmine / Aikens Village / Belmont Estates to open up a new vehicular access from Belarmine onto Kilgobbin Road. The Draft LAP shows Link 2 providing a pedestrian/cycle connection from BELAP to the existing Greenway in Stepside North.</p>	Bo67	<p>The Belarmine / Aikens Village / Belmont areas are to the west of the Kilgobbin Road and outside of the BELAP area boundary. The issue of an additional vehicular access onto Kilgobbin Road from Belarmine cannot, therefore, be addressed through the BELAP plan process.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>viii. Submission refers to the Ballyogan Road as 'austere' and suggests a programme of tree planting and green pockets along the route.</p>	Bo67	<p>The Draft LAP makes adequate policy provision seeking visual and environmental improvements to the key strategic roads within the wider area. Draft Plan Policy BELAP MOV8 – Balance between Movement and Place, states, <i>'To protect the role of the key strategic roads within the LAP area so that they continue to serve their movement function, whilst also seeking visual and environmental improvements to these routes so that they contribute to a sense of place and create a pleasant environment to spend time. Schemes shall be designed in accordance with the Design Manual for Urban Roads and Streets, or its successor policy.'</i></p> <p>Recommendation No change to the Draft Plan.</p>
4.1.4. Walking and Cycling		
<p>i. Seeks further segregated cycle paths in the Plan area and is critical of safety issues associated with M50 Junction 15 (Carrickmines Interchange)</p>	Bo04	<p>Both the M50 corridor and the Carrickmines Interchange are under the operational control of Transport Infrastructure Ireland (TII). Any significant strategic changes or alterations to the Carrickmines Interchange (Junction 15) would require to be advanced by TII.</p> <p>The issues around the Carrickmines Interchange are noted in BELAP Section 4: Transportation and Movement</p>

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		<p>which states 'While the M50 offers good road access, it also presents a major barrier to integration with the wider area' and, '...the only direct connections across the M50 are at Junction 14 and 15, where cyclists and pedestrians must to a greater or lesser extent, mix with vehicular traffic – including traffic coming on and off the motorway – with limited physical separation and/or junction priority. Similarly, motorists wishing to cross the motorway must do so via these junctions, impacting on strategic road movements.'</p> <p>The current 2016-2022 County Development Plan (CDP) seeks to address the issues with the County's M11/M50 motorway corridors through the provision of new shared cycle/pedestrian footbridges at key locations to foster increased permeability and mitigate issues of severance and potential traffic hazard. One such location included in CDP Table 2.2.2: Pedestrian / Cycle Footbridges over the M50/M11 is 'M50 Carrickmines Junction (East to West)'. The Kilternan Link Road proposed under the Cherrywood SDZ Planning Scheme will provide a direct link from the roundabout at the Park, Carrickmines to Cherrywood – and subsequently onwards to the N11 – by way of a new 'all modes' bridge to be constructed east of and separate to Junction 15.</p> <p>In relation to the planned future cycle network in the wider BELAP area, these are clearly set out in Policy BELAP MOV12 – New Linkages which identifies proposed linkages (Table 4.6) and maps 28 no. routes that are to be advanced in the Plan area (Figure 4.11), of which 18 no. are pedestrian / cycle routes including a number of strategic local importance:</p> <ul style="list-style-type: none"> • Greenway connecting from Lambs Cross to the Kilternan Link Road along the line of the Ballyogan Stream. • Greenway from Glenamuck Road through the planned Jamestown Park to Ballyogan Road (Samuel Beckett Civic Campus). • Racecourse Bridge crossing linking the Plan area directly to the high-density employment centres at South County Business Park and Sandyford Business District. • Kilgobbin Road to Drummartin Link Road – a dedicated cycle lane connecting the western parts of the BELAP area with Sandyford Business District. <p>Recommendation No change to the Draft Plan.</p>
<p>ii. Submission welcomes the focus in the Draft Plan on active transport, walkability and cycle lanes in terms of its potential to enable local residents to live an active lifestyle as well as improving ambient air quality by decreasing dependence on transport by car.</p>	<p>Bo13</p>	<p>The Executive welcomes the contents of the submission.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>iii. Submission raises concerns in relation to: the specification of the on-road cycle lane along Murphystown Way between Ballyogan Road and M50 Junction 14 (Leopardstown Road); and, the unfinished pathway/cycle path from Glencairn View to the Glencairn Luas stop.</p>	<p>Bo04 Bo40</p>	<p>The 'fine grain' issues raised are effectively operational/management matters and not considered to be a Local Area Plan issue.</p> <p>Recommendation No change to the Draft Plan.</p>

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iv. Supports the prioritisation of segregated cycle infrastructure over provision for the motor car.	Bo62	<p>The Draft Local Area Plan places significant emphasis on pedestrian and cycling movement in the Plan area. Policy BELAP MOV₁ – Pedestrian and Cycle Network is to <i>'...provide for a new high quality pedestrian and cycle network within the LAP area which will connect existing and new communities and redefine the character of the LAP area; including (i) creation of new segregated green routes...'</i></p> <p>In addition, Policy BELAP MOV₄ – Cycling Infrastructure, requires that where practicable, all new cycling infrastructure is to be provided in accordance with the standards of the NTA's National Cycle Manual (2012), recognising the challenges in retrofitting infrastructure into an already established road network.</p> <p>Recommendation No change to the Draft Plan.</p>
4.3.2. Public Transport Policy		
i. TII highlights that they were not approached in relation to the potential for using the Racecourse Luas Stop on a permanent basis (Policy BELAP MOV6 refers). Submission states that the Racecourse stop is currently designed for race day traffic only and any changes would require engineering and urban design interventions.	Bo14	<p>The Environmental Impact Statement (EIS) prepared for the Luas Green Line B₁ Extension Project connecting Sandyford and Cherrywood, included an explanation for each of the Luas stops along the proposed line. With regards to the Racecourse stop the EIS stated, <i>'...This stop is intended primarily to operate on event days at the Leopardstown Racecourse at present with the potential to become a full operational stop in the future...'</i> The EIS further stated that <i>'The Race Course stop is proposed as an occasional stop at present with the potential to become a full time stop in the future. However, this would be subject to future development in the area...'</i></p> <p>While it is acknowledged that engineering and urban design interventions would be required to facilitate the opening of the stop, it is considered that – given the context of the significant planned residential growth in the immediate vicinity – that Draft Plan Policy BELAP MOV6 to facilitate the opening of the Racecourse Luas Stop on a permanent basis to the public – is both fully appropriate, and in accordance with the intended purpose and State investment in construction of the Luas stop. As set out in Part 2 of this Report, it is recommended that a phasing plan be inserted into the Final LAP (new Section 12.1 – 'Phasing') that addresses the phasing of the delivery of homes with the opening of the Luas stop.</p> <p>Recommendation No change to the Draft Plan.</p>
ii. Submission suggests that a new Luas station should be constructed adjoining the Samuel Beckett Civic Campus and in close proximity to the proposed Jamestown Park.	Bo35	<p>The Luas Green Line is under the operational control of Transport Infrastructure Ireland (TII). Any proposal, or otherwise, to introduce a new Luas stop, would be an operational decision for TII to make and is not a Local Area Plan issue. Notwithstanding, it is noted that the Samuel Beckett Civic Campus is located at a distance of only approx. 400m from the existing Ballyogan Wood Luas stop and approx. 600m from the Leopardstown Valley Luas stop.</p> <p>Recommendation No change to the Draft Plan.</p>

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4.3.5. Proposed Linkages		
<p>i. Seeks improved pedestrian / cycle connectivity from Stepside East (Crugh, Stepside Park and Wingfield) to Ballyogan Road and better access to the Dublin Mountains.</p>	<p>Bo01 Bo40</p>	<p>In order to implement the improved connectivity and permeability objectives embedded in the Draft Plan, Section 4.3 includes an integrated suite of policies that address <i>inter alia</i>:</p> <ul style="list-style-type: none"> • The delivery of new and improved linkages, with a focus on pedestrian and cycle modes, permeability, crossing the M50 'barrier' and local network improvements; • The provision of walking and cycling feeder networks to public transport modes, particularly Luas; and, • The provision of walking and cycling feeder networks to existing and proposed neighbourhood centres, schools and community centres. <p>Policy BELAP Mov12 – New Linkages: 'To provide or facilitate the delivery of the new linkages shown in Table 4.6 and Figure 4.11', identifies a whole suite of new linkages – road, pedestrian and cycle – aimed at significantly improving connectivity/permeability both within the Plan area and adjacent lands.</p> <p>With specific reference to Stepside East Links 4, 5 and 6 – Ballyogan Road to respectively Stepside Park, Cruagh Manor and Cruagh Green - intended links will connect these established residential areas in Stepside East with Ballyogan Road, providing direct desire lines to the Luas Green Line, schools, the Samuel Beckett Civic Campus and Neighbourhood Centre facilities at Leopardstown Valley. In this regard, it is noted that agreement was reached with Park Developments Ltd. as part of the planning process for Clay Farm Phase 2, to facilitate a pedestrian/cycle route (a 5m wide reservation), connecting Cruagh Wood via Clay Farm (Phases 1 and 2) to Ballyogan Road. The NTA has recently completed the design and survey works and funding has now been secured for the link. The design consultants are currently finalising the construction tender documents and it is anticipated that the project will proceed to tender within the next month to six weeks.</p> <p>A pedestrian entrance into the recently opened Fernhill Park and Gardens, in the foothills of the Dublin Mountains, lies only 700m metres to the north-west of Stepside East. A public right-of-way traverses the southern extents of the Park from east to west and is currently being upgraded and retained by the Council to improve pedestrian access to the Dublin Mountains.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>ii. Submissions welcome the proposal to formalise public pedestrian/cycle accessibility across the Racecourse Bridge (proposed Link no. 12).</p> <p>As HRI is state owned, public accessibility across the bridge should be facilitated, particularly in light of the new post-primary school soon to be constructed at Levmoos-Mimososa. Access should be maintained during the construction of the secondary school.</p>	<p>Bo02 Bo04 Bo40 Bo67</p>	<p>Link no. 12, 'M50 Crossing – Racecourse Bridge to Leopardstown Valley', is currently under the control of Horse Racing Ireland and is not officially publicly accessible. DLR are continuing to explore with HRI the potential to facilitate public pedestrian and cycle access across the bridge. The bridge would provide a key sustainable connection between the developing residential areas in the BELAP area and the high-density employment nodes in South County Business Park and the wider Sandymount Business District.</p> <p>Recommendation No change to the Draft Plan.</p>

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<p>iii. Submission concerned that the road network as proposed in the Draft Plan would provide for a direct vehicular route or bypass from Enniskerry Road through Stepside Park to Ballyogan Road. Such a route would serve as a rat run during peak traffic times and would seriously injure residential amenity, the safety of residents and create a traffic hazard within Stepside Park.</p> <p>Submission seeks additional clarity and recognition in the Draft Plan of previous planning decisions (Condition no. 9 of Reg. Ref. 95A/1000 and Condition no. 8 of Reg. Ref. D13A/0190) that expressly omit the provision of a vehicular link from Enniskerry Road to Ballyogan Road through Stepside.</p> <p>Submission suggests CPO powers should be used to deliver the Clay Farm Loop Road, which would in turn allow for Stepside Park to be cul-de-sac'ed as per the planning permission.</p>	<p>Bo12 Bo46</p>	<p>The Executive does not agree that the Draft Plan would provide for a direct vehicular route or bypass from Enniskerry Road through Stepside Park to Ballyogan Road. As set out in the planning history of Stepside Park in Section 4.3.5 (v) below, Stepside Park is to be connected to the Clay Farm Loop Road and a cul-de-sac is to be put in place within Stepside Park, with some development accessing the Enniskerry Road and some development accessing the Ballyogan Road. The planning conditions regarding the cul-de-sac in Stepside Park are requirements of planning permissions as approved by the Planning Authority and An Bord Pleanála. There is no provision for the local area plan-making process to delete a condition of a planning permission.</p> <p>It is noted that in accordance with said planning conditions, the location of the cul-de-sac for motor vehicles in Stepside Park is indicated on Figure 4.11 of the Draft Plan. It is thus not considered necessary to include additional text in respect of same.</p> <p>In terms of the Clay Farm Loop Road, this will be delivered incrementally as individual land parcels are opened up for development through the Development Management process. The Clay Farm Phase 1 section of the road has been completed and construction of the Clay Farm Phase 2 section of the road has recently commenced. Discussions between Council officials and the various landowners involved are continuing.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>iv. TII highlights that they were not approached in relation to utilising the existing Luas M50 overbridge for a pedestrian and cycle link (Link no. 9 - Policy BELAP MOV12 refers). Submission advises that the Luas M50 overbridge is fundamentally incompatible with the link proposed for reason of, <i>inter alia</i>, its width and design. Submission requests the removal of the indicated potential use of the existing Luas M50 overbridge as a pedestrian and cycle link</p>	<p>Bo14</p>	<p>The delivery of pedestrian and cycle linkages from the planned residential growth area at 'Racecourse South' to lands south of the M50 is considered to be of key importance to the achievement of a sustainable neighbourhood focussed on sustainable modes of transport. This principle is endorsed in the submission from the NTA on the Draft LAP that states, <i>'There should be a high degree of permeability for walking and cycling within the LAP area, and strong walking and cycling links to adjacent areas, including public transport stops and District, Neighbourhood and Local Centres'</i>.</p> <p>The Site Development Framework for Racecourse South includes two potential locations – a <i>'preferred location'</i> and an <i>'optional location'</i> - for the delivery of pedestrian and cyclist connectivity with lands to the south of the M50. The <i>'preferred location'</i> is further detailed in proposed Link no. 9 in Section 4.3.5 that states <i>'This Link would connect the Racecourse South lands and residential areas in Foxrock to Ballyogan Road, negating the need to cross at the existing Junction 15. It also provides strategic north-south (Kiltieman-Foxrock) and east-west (BELAP – Cherrywood) connectivity. The existing Luas Bridge structure provides an opportunity for delivering this link.'</i></p> <p>While TII's concerns are noted in relation to the incompatibility of the existing Luas overbridge to facilitate the link - based on <i>inter alia</i> its width and design and potential impact on the safety of both non Luas users and the safety and operation of the Green Line service - it is not envisaged that the existing overbridge would be used in such a manner but rather a route fully segregated from the track in the form of, potentially, a cantilevered structure. The location of such a route is considered optimum in the context of access to amenities, including the future Neighbourhood Centre at Carrickmines, integration of public transport and pedestrian / cycle routes, the minimisation of visual impact and the avoidance of duplication of significant infrastructure traversing the M50. Notwithstanding, should a</p>

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		<p>potential engineering solution not be achievable to deliver the 'preferred location' the Draft LAP makes provision for an 'optional location', as indicated on the Site Development Framework for Racecourse South (see Figure 12.4). Given the flexibility provided for in the Draft LAP to deliver the pedestrian/cycle linkage, it is not considered necessary to amend the Draft Plan to omit the 'preferred location', in advance of assessing potential engineering solutions.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>v. A number of submissions state their opposition to a planning condition that requires the cul-de-sac'ing of the lower part of Stepside Park, as referenced by Link no. 4 set out in Table 4.6 and illustrated in Figure 4.11 of the Draft Plan. It is requested that the status quo be maintained, and continued access is allowed to Enniskerry Road for the residents of Stepside Park Lower. Some of the main reasons raised include, <i>inter alia</i>:</p> <ul style="list-style-type: none"> • Planning was granted nearly 20 years ago. At that time, it was never envisaged that it would take all this time for the road and cul-de-sac to be installed. • The DLR County Council Roads Department criteria during this time has now changed, in so far as they now favour 'filtered permeability' i.e. no cul-de-sac implementation and traffic management measures introduced for cases such as this. • Since this planning condition was granted, the demographics of the residents has changed considerably. • Residents now have children in attendance at local schools, creches, sports/youth clubs and other amenities/activities. Introducing a cul-de-sac would force additional journeys and journey times. This in turn has environmental impacts. • There has never been any health and safety related incidences over this whole period of time. • Right of way access established for over 17 years to access Enniskerry road would be lost. • The commercial centre / businesses in Stepside village will not be on the route in nor out of our homes. This would have a significant impact on the village businesses and local community spirit. Stepside businesses have invested considerable money / time in bringing the village back to life. Circa 750 residences would be cut off from these businesses and the local community. • A cul-de-sac would divide the established community in two. 	<p>B015 B016 B017 B018 B019 B020 B021 B022 B023 B024 B026 B027 B028 B029 B030 B031 B033 B034 B036 B037 B039 B041 B044 B045 B048 B052 B053 B054 B055 B057 B058 B059</p>	<p>The long term and long standing plans for access to Stepside Park involves an access from Ballyogan Road and an access from Enniskerry Road. The planning history below outlines the precise details.</p> <p>DLR Reg. Ref. D98A/1000, Appeal Ref. PLo6D.111521 In 1999, planning permission was granted for amending approved plans D96A/0197 for residential development at 'Stepaside Park', Enniskerry Road, Stepside, Co. Dublin. Conditions attached to that grant of permission required, among other items, the exclusion of 49 no. houses and apartments from the north-east corner of the site to facilitate the completion and adoption of the Stepside Action Area Plan and the identification of a definitive distributor Loop Road alignment (Condition no. 2). Condition no. 9 required that the northern side of the development be accessed from the Ballyogan Loop Road when complete, leaving 140 units on the southern side accessed from the R117. Condition no. 9 stated:</p> <p><i>9. (1) Provision shall be made for vehicular access from road no. 2 to the proposed distributor road to the north. On connection to this distributor road, road number 2 shall be cu-de saced at</i> <i>(a) south of the intersection with road number 3 and</i> <i>(b) Adjoining apartment block number 2/house number 124.</i> <i>The remaining section of road shall be incorporated into the open space associated with apartment blocks.</i> <i>Reason: To provide for improved vehicular access to the site and to prevent through traffic</i></p> <p>DLR Reg. Ref. D03A/1213 / Appeal Ref. PLo6D.207092 In 2004, planning permission was granted for amendments to approved plans Reg. Ref. D00A/1279 at Stepside Park. Condition no. 2 stated the following:</p> <p><i>2. Prior to completion of the distributor loop road, the residential component of the proposed development shall be limited to townhouses numbered 2-27 inclusive shown on the site layout plan received by the planning authority on 15th day of March 2004. On completion of the loop distributor road the remainder of the development may be constructed and occupied. <u>On completion of the proposed distributor loop road to Ballyogan Road the provisions of condition number 9 attached to planning register reference number D98A/1000 shall be implemented in full.</u></i> <i>Reason: In the interest of traffic safety and to safeguard the amenities of existing residents</i></p> <p>DLR Reg. Ref. D13A/0190 / Appeal Ref. PLo6D.242585 Permission was granted by the Planning Authority and An Bord Pleanála for the development of 46 no. houses on</p>

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<p>Many families have relatives and friends in the upper part of Stepside Park. They share school runs, child minding, social interactions, all of which would also be adversely affected.</p> <ul style="list-style-type: none"> The Community's sense of identity would be lost. We would no longer be part of the local Stepside community. Homeowners with access for over 17 years are losing this access, whereas new homes being built will be given access to the Enniskerry road. Health and safety concerns with regard to emergency services accessing the estate via the correct entrance. Impacts on property value. The traffic on Ballyogan Road is already extremely busy at peak times. Access for sanitation vehicles. 	<p>Bo60 Bo64 Bo66 Bo68 Bo69 Bo79 Bo80 Bo81 Bo86 Bo87 Bo88 Bo89 Bo90 Bo91 Bo92 Bo93 Bo94</p>	<p>part of the remaining undeveloped lands to the north of Stepside Park, Stepside, Co. Dublin. Condition no. 8 of the Board Decision stated the following:</p> <p><i>8. On completion of the proposed distributor loop road to Ballyogan the provisions of condition number 9 attached to planning register reference number D98A/1000 shall be implemented in full.</i></p> <p><i>Reason: In the interest of public traffic safety and in the interest of proper planning and sustainable development of the area.</i></p> <p>Based on the conditions attached to the above referenced planning permissions, Stepside Park is to be connected to the Clay Farm Loop Road and a cul-de-sac is to be put in place within Stepside Park, with some development accessing the Enniskerry Road and some development accessing the Ballyogan Road. In relation to the 1998 permission, the condition states that '<i>Provision shall be made for vehicular access from road no. 2 to the proposed distributor road to the north. On connection to this distributor road, road number 2 shall be cul-de-sac'ed...</i>' indicating that once the Clay Farm Loop Road is in place road number 2 in Stepside park is to be connected to the Loop Road and the cul-de-sac put in place. In relation to the 2013 permission, the condition states that '<i>On completion of the proposed distributor loop road to Ballyogan the provisions of condition number 9 attached to planning register reference number D98A/1000 shall be implemented in full</i>', indicating that upon completion of the Clay Farm loop Road, condition no. 9 of the 1998 permission shall be implemented.</p> <p>The above planning conditions are requirements of planning permissions as approved by the Planning Authority and An Bord Pleanála. There is no provision for the local area plan-making process to delete a condition of a planning permission.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>v. Submission welcomes the planned cycle/pedestrian route to Cherrywood. Notes that it is crucial that it is an uninterrupted cycle route that is safe to travel on and does not require crossing over traffic where possible.</p>	<p>Bo32</p>	<p>The Kiltarnan Link Road proposed under the Cherrywood SDZ Planning Scheme will provide a direct link from the roundabout at the Park, Carrickmines to Cherrywood – and subsequently onwards to the N11 – by way of a new 'all modes' bridge to be constructed east of and separate to Junction 15.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>vi. Submission raises concerns regarding the incomplete pedestrian link from Ballyogan Avenue to Holy Trinity National School.</p>	<p>Bo40</p>	<p>The planning permission granted for the Leopardstown Shopping Centre included a mix of uses, and while the commercial and office elements were built, additional facilities were not completed. Any future proposals for the build-out of the remaining undeveloped lands will be required to deliver a more coherent and integrated built environment, including improvements to pedestrian and cycle connectivity at this location.</p> <p>Policy BELAP RET7, included in the Draft Plan, requires that, '<i>Future development proposals will be required to deliver public realm enhancements including coherent visual and physical integration with adjoining uses, a positive</i></p>

Key Issue	Sub. No.	Executive's Response & Recommendation
		<p><i>contribution to pedestrian and cyclist connectivity, and the incorporation of high quality hard and soft landscaping proposals.'</i></p> <p>Recommendation No change to the Draft Plan.</p>
<p>vi. Submission requests that the most up-to-date version of the 'Six Year Roads Objective' from The Park, Carrickmines to Ballyogan Road be incorporated into the Plan.</p>	<p>Bo49</p>	<p>The Executive notes the contents of the submission. It is recommended that the Draft Plan be amended to reflect the indicative nature of the linkages illustrated on Figure 4.11.</p> <p>Recommendation Amend the Draft Plan as follows:</p> <p>Add the following text to the legend of Figures 4.11:</p> <p><i>The lines of the road proposals shown are indicative only and may be subject to change as detailed design is advanced.</i></p>
<p>vii. Submission welcomes proposals to improve access from the Enniskerry Road to Ballyogan Road as it will improve access to the Luas and local shopping by residents in Stepside and Kiltarnan.</p>	<p>Bo67</p>	<p>The Executive notes the comments of the submission.</p> <p>Recommendation No change to the Draft Plan.</p>

5. Residential Development and Built Form

Key Issue	Sub. No.	Executive's Response & Recommendation
<p>i. Some submissions expressing concern that the area is being over-developed and too many apartments are being built. Development is impacting on the existing environment and residential amenity standards, and infrastructure/services can't cope.</p> <p>Another submission welcomes increased scrutiny of apartment blocks over 4 storeys provided by 'Policy BELAP Res5 – Building Height by Scheme' but queries why apartment blocks are being encouraged in the area.</p>	<p>Bo01 Bo38 Bo42 Bo51 Bo67</p>	<p>A key imperative contained in the National Planning Framework (NPF) is to secure better and more compact forms of future development in contrast to an unsustainable pattern of development whereby cities and town centres continue to grow outwards rather than consolidating and strengthening existing built up areas. On foot of a commitment of the NPF the government committed to the preparation of new statutory guidelines on urban development and building heights which were subsequently published in December 2018. The principle objective of the 'Urban Development and Building Height – Guidelines for Planning Authorities' is to ensure greatly increased levels of residential development in urban areas through a combination of increased building heights and overall density of development – particularly in locations proximate to high quality public transport corridors with other complementary infrastructure in place. The default minimum parameters for such sites within 1km of a Luas corridor is 50 dwellings per hectare and '<i>...general building heights of at least three to four storeys...</i>'. This would encompass close to the entirety of the BELAP area.</p> <p>The statutory Eastern and Midlands Regional Spatial and Economic Strategy (RSES) was only very recently agreed by the Regional Assembly (1st March 2019), subject to material amendments. The RSES incorporates – as a subset – a Dublin Metropolitan Area Strategic Plan (MASP) which provides a 12-year strategic planning and investment framework for the Dublin Metropolitan Area – which includes the area covered by BELAP. The MASP identifies a limited number of strategic residential and employment corridors with accessibility to high quality public transport provision, to deliver sustainable compact communities of scale. In relation to the BELAP area the MASP states '<i>...the existing Luas Greenline and the proposed upgrading of this line will support new and emerging districts in the south county at Sandycove, Cherrywood and Ballyogan</i>' and includes, '<i>New residential communities in Ballyogan and environs and Kiltiernan-Glenamuck</i>' with associated short, medium, and long-term growth targets.</p> <p>The current 2016-2022 County Development Plan states, in relation to the Stepside/Ballyogan area '<i>...that it would be timely to effect a review and preparation of a new statutory Local Area Plan during the lifetime of this Development Plan – particularly addressing the issues of provision of the second collector Loop Road off the Ballyogan Road, the need to ensure the maintenance of higher densities in close proximity to quality public transport corridors, further development of the central Greenway Spine (including addressing issues of permeability and pedestrian and cycle links to the Luas) to the planned Jamestown Park, and beyond to the employment and retail areas at the Park, Carrickmines. The review may involve extending the the area to include parts of Carrickmines and Glenamuck and the, as yet undeveloped, Horse Racing Ireland lands north of the M50 corridor</i>' (pages 27-28). It is highlighted that any LAP has to align and be consistent with the provisions and objectives of the overarching 'parent' County Development Plan, and in this regard, the Draft Ballyogan and Environs LAP is fully consistent with the density imperatives as set out in the County Development Plan.</p> <p>Finally, it should be noted that a number of recent planning permissions for significant residential development in the BELAP area – notably Clay Farm Phase 2 (ABP Ref. 301522) and Glencairn House (ABP Ref. 302580) - have included a mix of residential typologies, including apartments and own-door accommodation, and still achieved acceptable density standards.</p> <p>Recommendation</p>

Key Issue	Sub. No.	Executive's Response & Recommendation
		No change to the Draft Plan.
<p>ii. Queries the allowing of high building heights and density in the area south of the Gallops Luas Stop. The area is poorly served in terms of amenities. The Park Carrickmines and the HRI lands are more obvious areas to accommodate higher building heights and density.</p>	Bo01	<p>Planning permission was granted by An Bord Pleanála in August 2018 for a Strategic Housing Development planning application for 927 no. residential units at the lands at Clay Farm off Ballyogan Road, south of the Gallops Luas stop (Ref. ABP301522) – prior to the Government's publication of the <i>'Urban Development and Building Heights – Guidelines for Planning Authorities'</i> document. In recommending a grant of planning permission the Bord Inspector referred to the <i>'Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities'</i> – published in March 2018 – which states that accessible urban locations, which includes sites within 1km of a Luas stop, are generally suitable for development at higher densities that are comprised wholly or mainly of apartments. Referring to the guidance set out in <i>'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas'</i>, the Inspector further stated that <i>'...minimum net densities of 50 dwellings per hectare should be applied for housing development in public transport corridors, including those within 1km of light railway.'</i></p> <p>The Clay Farm scheme granted by the Board delivers an average density of 55 dwellings per hectare and ranges in height from 3 to 6 storeys. In making their recommendation, the Board Inspector commented that, <i>'The proximity of the site to the Luas means that it is suitable for apartment development under the 'Design Standards for Apartments' issued by the Minister in 2018',</i> and that, <i>'...it should be noted that the development would be within the existing built-up area of the city on a public transport corridor. Restricting residential development here would displace demand for housing to areas that were less accessible by sustainable transport modes and would therefore be likely to cause greater demands and congestion on the road network. The effect of the development on material assets would therefore be significant and positive'.</i> In this regard it is further noted that, in its submission, the National Transport Authority welcomed the principle of more development in a location served by the Luas.</p> <p>With regard to the yet undeveloped Racecourse South lands the Draft LAP includes a Site Development Framework (Section 12) which sets out a series of Guiding Principles – including height, density and housing mix – that any planning application for the site would be expected to comply with. The densities proposed for Racecourse South range from 45 to 80+ dwellings per hectare, and these densities allow for a mix of residential typologies across the site. The Park, Carrickmines is essentially a commercial/retail entity where current built form is no higher than 6 storeys.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>iii. Submission advocates 'senior housing' to be included in planned residential developments to facilitate 'downsizing' and the release of larger family houses into the housing market.</p>	Bo12 Bo40	<p>The Residential Development and Built Form Section of the Draft LAP states that, <i>'Much of the policy context for residential development is set by the County Development Plan – zoning and development standards – and by National Policy'</i> (Page 20). County Development Plan Policy RES9: Housing for All, supports the concept of independent and/or assisted living for older people and people with disabilities/mental health issues. In this regard it is Council policy to <i>'...support the provision of specific purpose-built accommodation, or adaption of existing properties, and will promote opportunities for elderly householders to avail of the option of 'downsizing' within their community'.</i> As Policy RES9 has universal application across the entire County, it is considered unnecessary duplication to re-state in finer grain Local Area Plans.</p>

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		<p>The Government published a new policy document '<i>Housing Options for Our Ageing Population</i>' in February 2019 with a stated ambition of ensuring 30% of all new dwellings are built to incorporate universal design principles to accommodate the ageing population by 2024. The policy document also references financial incentives to support older persons in both public and private housing to 'right size' to more energy efficient and appropriate housing units. There are some very clear signals in the document suggesting a number of the actions and remediations will be underpinned by supporting legislation.</p> <p>Within the BELAP area planning permission was granted in 2017 (DLR Ref. D16A/0452) for a 224 no. bedroom assisted living complex on the undeveloped site flanking the northern edge of the Leopardstown Shopping Centre and Ballyogan Avenue – the first such accommodation in the LAP area.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>iv. Submission highlights the importance of providing a variety of housing types in the BELAP area.</p>	<p>Bo13</p>	<p>The Draft Plan makes specific policy provision for a sustainable housing mix and social housing provision. Policy BELAP RES6 – Housing Mix provides that '<i>Any planning application for new residential development within the BELAP area shall provide for a suitable mix of house types and sizes that meet the needs of a range of households and that both complement and enhance the existing residential mix...</i>'. In terms of social housing, Policy BELAP RES9 states, '<i>To support the delivery and integration of the proposed Council housing scheme at Ballyogan Court South (see Figure 11.1), and to pursue further opportunities for social housing throughout the BELAP area in an integrated manner, through 'Part V' housing, Council own build, delivery by approved housing bodies, or otherwise, in line with the council's Housing Strategy, and to support any Affordable Housing schemes that might be introduced by the Department of Housing, Planning, and Local Government.</i>'</p> <p>Recommendation No change to the Draft Plan.</p>
<p>v. The protection of residents from environmental noise from nearby roads needs to be considered at the planning stage. The health effects of poor quality air resulting from vehicular traffic should be considered.</p>	<p>Bo13</p>	<p>The DLR County Development Plan 2016-2022, of which the Draft LAP is 'subserving' to, includes detailed requirements in terms of the assessment of noise and air pollution through the Development Management process (see Section 8.2.9.1 and 8.2.9.2). In recognition of the adjacency of the Racecourse South SDF to the M50 Motorway specific design guidance has been incorporated into the Draft Plan stating that, '<i>The mitigation of noise impacts associated with the M50 and Luas shall be a component part of scheme design</i>'.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>vi. Submission relates to a site known as Mountwood on the Ballyogan Road. Submission requests a number of amendments be made to the Draft LAP including:</p> <ul style="list-style-type: none"> • Revise the boundary of Ballyogan North to exclude 	<p>Bo49</p>	<p>The submission relates to a small site of c. 0.1 hectares, that is situated at the end of an existing row of existing low density residential development. Given the scale of the site, in the context of the BELAP area, it is not considered necessary nor appropriate to attribute specific policy objectives to the site in question.</p>

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<p>Mountwood and adjacent residential properties on the southern side of Ballyogan Road.</p> <ul style="list-style-type: none"> • Incorporate the site into Ballyogan South and include specific residential objectives. • Consider moving the eastern end of Ballyogan South into the Carrickmines Quarter. • Consider a connection into the Council owned lands west of the new access road permitted in the IPUT development. • To increase height and densities at Mountwood. • To define the characteristics of each Neighbourhood. • To define medium building height. 		<p>The location of the site in the Ballyogan North Quarter is considered appropriate in the context of its residential zoning and its existing built form, being part of a row of low density residential housing. Table 5.4 of the Draft Plan sets out the minimum density standards for residential development by Neighbourhood and provides that the Ballyogan North Quarter shall, as a general rule, have a minimum net density of 50 units per hectare. The rationale for same is stated as '<i>Is predominantly established low-density housing with few opportunities for infill development.</i>'. The minimum density standard provided, and rationale for same, is considered appropriate for the Ballyogan North Neighbourhood, inclusive of the site in question. In terms of building height at Ballyogan North, Table 5.5 provides that '<i>This Neighbourhood is characterised by two storey housing with few opportunities for infill development of scale.</i>'. Again, this rationale is considered appropriate given the existing characteristics of the site and built form, being immediately adjacent to low density residential properties along Ballyogan Road.</p> <p>The suggestion to include additional text in the LAP pertaining to the character and constraints of each Neighbourhood is considered excessive. The Draft LAP includes sufficient content pertaining to individual Neighbourhoods and areas, particularly in the context of areas designated for significant potential growth over the coming years.</p> <p>In terms of policy provision made for building height in the Draft Plan, guidance is provided at Neighbourhood level in Table 5.5, and further policy guidance is provided in Policy BELAP RES5 – Building Height by Scheme, that sets out requirements to be adhered to for all proposed buildings in excess of 4 storeys. It is not considered necessary to include a definition for 'medium height' in the Draft LAP.</p> <p>Recommendation No change to the Draft Plan.</p>
vii. Objects to 12-15 storey apartments in Clay Farm.	Bo61	<p>There are no proposals for 12-15 storey apartments in the Clay Farm development. The permitted apartment blocks in Clay Farm range in height from 3 to 6 storeys.</p> <p>Recommendation No change to the Draft Plan.</p>
viii. Submission references a zoned residential site in the Carrickmines area and advises of their intention to shortly progress a significant residential development at the site. Submission records support for the Draft LAP and in particular the policies on building height as contained in Section 5.3.4, Table 5.5 and Policies BELAP RES3/RES4 and RES5.	Bo71	<p>The Executive notes the content of the submission.</p> <p>Recommendation No change to the Draft Plan.</p>
ix. Submission comments that new apartment developments on the Kilgobbin Road needs to be mindful of the character of the area and not visually intrusive.	Bo73	<p>There is limited scope for any development of significant scale along the Kilgobbin Road. The Kilgobbin Road currently comprises of low density existing residential properties, interspersed by a number of Protected Structures, and has a 'Long Term Road Objective' in the County development Plan to be retained as a 'country road'.</p>

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		<p>The area of the Kilgobbin Site Development Framework immediately abuts the Kilgobbin Road; however, it is noted that vehicular access for all new residential development within the SDF is to be provided via the Clay Farm Loop Road and/or its feeder routes. It is further highlighted that the SDF lands that abut the Kilgobbin Road primarily comprise of 'Ecological Corridor/Environmental Buffer Zone', and the attendant grounds of Oldtown House, a Protected Structure. In terms of development adjacent to Oldtown House, the Guiding Principles set out in the SDF require that 'Any development in proximity of Oldtown House will provide for the sensitive protection of the Protected Structure.'</p> <p>Recommendation No change to the Draft Plan.</p>
<p>x. Submission welcomes the recognition of the Park, Carrickmines as an appropriate location for higher buildings, and for the development of residential development and Build-to-Rent accommodation. Notwithstanding, the submission recommends amendment of several provisions and policies within the Draft Plan including, inter alia:</p> <ul style="list-style-type: none"> • Increased minimum residential density at The Park; • There should be no restriction on the provision of residential uses at ground floor level. Proposals for residential use should be considered on a case by case basis. • Policy BELAP Res4 should be amended as it is considered to be contradictory to provisions included elsewhere in the Plan, notably Policy BELAP RET16 – Residential Uses and Policy BELAP RES8 – Build to Rent. 	<p>Bo8z</p>	<p>A significant component of the submission's case for a more flexible approach towards residential development at The Park, Carrickmines would appear to be grounded in an inference that SLO Objective 131 has a degree of primacy over the 'E' Zoning Objective at the lands. Statements such as '<i>...the SLO for a mixed use neighbourhood centre on these lands qualifies the interpretation of the E Zoning Objective for the wider area</i>' and, '<i>...having regard to the fact that the 'E' Zoning of the lands at The Park is interpreted in the context of SLO 131 for a mixed use neighbourhood centre...</i>' fails to appropriately recognise the primacy of the land use zoning objective for the lands as Objective E 'To provide for economic development and employment'. Employment zoned lands are identified in the County Development Plan - and Specific Local Objective 131, that relates to the provision of a Neighbourhood Centre and leisure facilities at these lands - is specific to these 'E' zoned lands only. The Objective provides for land-uses that would normally only be 'Open for Consideration' and does not extend to any more than that.</p> <p>Employment zoned lands at Carrickmines are of strategic importance to the County for the delivery of high intensity employment. The relative quantum of employment zoned lands in Dún Laoghaire-Rathdown is low in the context of the other Dublin Authorities. There is a total of almost 300 hectares of employment lands within the County – only c. 60 hectares of which is greenfield, undeveloped land. Fingal County Council, by comparison, has a total of almost 2,700 hectares of employment land and South Dublin County Council has over 1,000 hectares of enterprise and employment zoned land. There is thus a degree of scarcity to employment zoned lands within the County, and a heightened need to protect these lands for employment uses in line with their zoning objective. The County Development Plan and Local Area Plan focus on safeguarding and delivering this objective. Any proposals for residential development at The Park will be considered in the context of its 'E' zoning objective, SLO 131 and associated policies contained in the LAP. It is thus not considered necessary nor appropriate to amend residential density standards contained in the Draft LAP.</p> <p>In specific reference to residential uses at The Park, Policy BELAP RET16 – Residential Uses, states '<i>To encourage residential use above ground floor level within this Neighbourhood Centre to maintain and improve the area's vibrancy and vitality, providing that the Neighbourhood Centre's prime land use objectives are complemented and not undermined.</i>'. The provision of active ground floor uses, with residential above, is considered an important component of successful Neighbourhood Centres, that improve an area's vibrancy and vitality, as evident in other Neighbourhood Centres in the County such as nearby Stepside. It is thus not considered appropriate to amend Policy BELAP RET16 to remove this requirement.</p>

Key Issue	Sub. No.	Executive's Response & Recommendation
		<p>Policy BELAP RES₄ – Locations for Higher Buildings of the Draft Plan states that, <i>'The locations identified as 'RES₄' in Glencairn North, Kilgobbin South, Mimosa-Levmoss, Racecourse South, The Park Carrickmines, and Old Glenamuck Road are considered as suitable locations for higher buildings within the BELAP area (see Figure 11.1). It is anticipated that all of these locations would be suitable for residential buildings, consistent with the prevailing zoning objective, save for The Park Carrickmines which is subject to 'E' zoning.'</i></p> <p>The rationale for inclusion of the second part of the above stated policy, is to acknowledge the specific 'E' Zoning Objective at the Park, Carrickmines, where residential development is 'open for consideration', as distinct to other designated RES₄ sites that are zoned 'Objective A – To protect and/or improve residential amenity', where residential is 'permitted in principle'. Notwithstanding it is considered that a further degree of clarity could be provided, and it is thus recommended that the policy be amended to reflect same.</p> <p>Recommendation Amend the Draft LAP as follows:</p> <p>Amend Section 5.3.4 Policy BELAP RES₄ – Locations for Higher Buildings (Page 24) to read:</p> <p>Policy BELAP RES₄ – Locations for Higher Buildings: The locations identified as 'RES₄' in Glencairn North, Kilgobbin South, Mimosa-Levmoss, Racecourse South, The Park Carrickmines, and Old Glenamuck Road are considered as suitable locations for higher buildings within the BELAP area (see Figure 11.1). It is anticipated that all bar one of these locations would be suitable for residential buildings, consistent with the prevailing zoning objective, save for The Park Carrickmines which is subject to 'E' zoning. The designation at The Park Carrickmines is subject to 'E' Zoning Objective, where residential is 'open for consideration' under the County Development Plan and as such, any proposed use mix would need to display compliance with this zoning objective.</p>

6. Retail and Employment

Key Issue	Sub. No.	Executive's Response & Recommendation
<p>i. There are gaps in the retail offering in the Plan area with only one supermarket in the Leopardstown Shopping Centre and a lack of restaurants/cafes. There is no convenience food offer at the Park, Carrickmines.</p>	<p>B001 B005 B032</p>	<p>The Leopardstown Shopping Centre is anchored by Dunnes Stores, which is the largest convenience offer in the BELAP area. The Centre also includes a number of smaller retail units, a creche, restaurant, HSE Primary Care Centre and a suite of own-door commercial office units. There also exists undeveloped lands within the confines of the Shopping Centre.</p> <p>A number of policies are included in the Draft Plan in respect of the Leopardstown Shopping Centre. Policy BELAP RET7 – Undeveloped Lands, BELAP RET 8 – Convenience Floorspace and BELAP RET9 – Restaurants and Cafes, respectively, (i) support and encourage the completion and full build-out of the remaining undeveloped lands at Leopardstown Valley (ii) require further incremental growth of additional convenience floorspace to be considered in line with local population levels and with reference to the growth of other Neighbourhood Centres in the vicinity, and (iii) encourage and facilitate the development of sit-in café/restaurant/dining opportunities to add to the mix of uses, increased dwell time and to enliven the Centre and its related public realm.</p> <p>The north-east Quarter of The Park, Carrickmines remains undeveloped and it is an Objective (SLO 131 of the County Development Plan) to support and facilitate the development of a new Neighbourhood Centre at the site. It is intended that this Neighbourhood Centre will serve both the existing and future populations in the local growth areas of Stepside-Ballyogan, Carrickmines, and Kilternan-Glenamuck. Draft Plan 'Policy BELAP RET13-Neighbourhood Centre' specifically provides for a Neighbourhood Centre with a retail floorspace cap of 6,000sq.m and a local level leisure facility at The Park, Carrickmines. A planning application for such a development – including an additional access route directly from Ballyogan Road - was granted by Dún Laoghaire-Rathdown in April 2019 (DLR Ref. D18A/0257) but is currently the subject of a third-party appeal to An Bord Pleanála (ABP Ref. 304396).</p> <p>Recommendation No change to the Draft Plan.</p>
<p>ii. Submission welcomes the proposed additional convenience retail offer at The Park, Carrickmines and requests that the units be reserved for specific retailers.</p>	<p>B032</p>	<p>Reserving retail units at The Park as suggested, for specific retail operators, is not within the gift of the County Council.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>iii. Submission queries which Villages future residents of the area will frequent.</p>	<p>B051</p>	<p>There are two established Neighbourhood Centres within the BELAP area at Stepside Village and Leopardstown Valley, and a designation for a new Neighbourhood Centre at Carrickmines. The Draft LAP sets out a range of policy objectives to assist and guide the future development of each Neighbourhood Centre.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>iv. Submission states that Policy BELAP EMP2 – Non-Employment</p>	<p>B078</p>	<p>Employment zoned lands within the BELAP area are of strategic importance to the County for the delivery of high</p>

Key Issue	Sub. No.	Executive's Response & Recommendation
<p>Uses: 'To ensure that any new uses on lands zoned 'E' within the BELAP area – aside from the lands subject to CDP SLO 131 (Neighbourhood Centre) at the Park Carrickmines - shall be restricted to uses deemed 'Permitted in Principle' for this zoning objective...' is not consistent with the parent County Development Plan 2016-2022 as it removes 'Open for Consideration' uses from the zoning objective, as set out in the Development Plan for 'E' zoned lands. Submissions requests that Policy BELAP EMP2 be omitted from the Draft Plan.</p>	Bo82	<p>intensity employment. The relative quantum of employment zoned lands in Dún Laoghaire-Rathdown is low in the context of the other Dublin Authorities. There is a total of almost 300 hectares of employment lands within the County - only c.60 hectares of which is greenfield, undeveloped land. Fingal County Council, by comparison, has a total of almost 2,700 hectares of employment land and South Dublin County Council has over 1,000 hectares of enterprise and employment zoned land. There is thus a degree of scarcity to employment zoned lands within the County, and a heightened need to protect these lands for employment uses in line with their zoning objective. The County Development Plan and Local Area Plan focus on safeguarding and delivering this objective.</p> <p>Notwithstanding, the Executive concurs with the submissions.</p> <p>Recommendation Amend the Draft Plan as follows:</p> <p>Remove Policy BELAP EMP2 and renumber subsequent BELAP EMP policies accordingly.</p>
<p>v. Submission recommends several amendments to the retail and employment provisions included in the Draft Plan that relate to The Park, Carrickmines. These include:</p> <ul style="list-style-type: none"> • The Draft LAP is overly restrictive in terms of the provision of a mix of uses at The Park. The Draft Plan should make reference to SPPR 2 of the 'Urban Development and Building Heights – Guidelines for Planning Authorities' to ensure that an appropriate mix of uses is achieved at The Park. • Express recognition should be provided in the LAP for an increased mix of uses at The Park. • The LAP should specifically recognise the potential for retail warehousing at the north-east quadrant of The Park. 	Bo82	<p>Lands at The Park, Carrickmines are zoned Objective 'E' under the County Development Plan, the objective of which is 'To provide for economic development and employment'. These lands are of strategic importance within the County for the delivery of high intensity employment. The relative quantum of employment zoned lands in Dún Laoghaire-Rathdown is low in the context of the other Dublin Authorities. There is a total of almost 300 hectares of employment lands within the County - only c.60 hectares of which is greenfield, undeveloped land. Fingal County Council, by comparison, has a total of almost 2,700 hectares of employment land and South Dublin County Council has over 1,000 hectares of enterprise and employment zoned land. There is thus a degree of scarcity to employment zoned lands within the County, and a heightened need to protect these lands for employment uses in line with their zoning objective. The County Development Plan and Local Area Plan focus on safeguarding and delivering this objective.</p> <p>As set out in the Draft Plan, Policy BELAP EMP3 – The Park Carrickmines, provides, 'To encourage and facilitate proposals for high intensity employment at The Park, Carrickmines. Proposals for development at The Park will be managed with the aim of delivering high intensity employment uses, save for the delivery of a Neighbourhood Centre at the northeast quadrant, and a cautionary approach will be taken towards any supplementary uses.' The inclusion of Policy BELAP EMP3 reflects the overarching Zoning Objective for the lands and is considered fully appropriate and ensures the development of lands at The Park in accordance with its overarching zoning objective 'To provide for economic development and employment.' It is highlighted that Specific Local Objective 131, that relates to the provision of a Neighbourhood Centre and leisure facilities at these lands, is specific to these 'E' zoned lands at Carrickmines only. The Objective provides for land-uses that would normally only be 'Open for Consideration' (Neighbourhood centre and leisure uses) and does not extend to any more than that.</p> <p>SPPR 2 of the 'Urban Development and Building Heights – Guidelines for Planning Authorities', states 'In driving general increases in building heights, planning authorities shall also ensure appropriate mixtures of uses, such as housing and commercial or employment development, are provided for in statutory plan policy...'. In consideration of SPPR 2, in the context of these Objective 'E' zoned lands, it is respectfully suggested that the appropriate mix of</p>

Key Issue	Sub. No.	Executive's Response & Recommendation
		<p>uses at The Park, Carrickmines are fully reflected in both 'overarching' County Development Plan policy provision and policies included in the Draft BELAP. To re-iterate, lands at The Park are zoned Objective 'E' and are of strategic importance within the County for the delivery of high intensity employment. It is not considered appropriate to incorporate increased flexibility for a greater mix of uses at The Park, beyond that which has been provided for by way of SLO 131.</p> <p>Policy BELAP RET₁₄ – Retail Warehousing of the Draft Plan states, <i>'To take a cautionary approach and limit additional new retail warehousing/retail park floorspace at the Park Carrickmines in advance of a new Retail Strategy for the Greater Dublin Area.'</i> The inclusion of Policy BELAP RET 14 is fully consistent with Policy BELAP RET₁₀ contained in the County Development Plan and also the cautionary sentiment outlined in the Retail Strategy for the Greater Dublin Area 2008-2016. In advance of the preparation of a new Retail Strategy for the Greater Dublin Area it is not considered appropriate to deviate from existing overarching policy provision by way of identifying specific sites suitable for retail warehousing development.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>vi. Submission raises concern in relation to the nature of development in Quarter 3 of the Park, Carrickmines – in the context of recent planning application Ref. D18A/0257.</p> <p>Submission references and agrees with concerns raised by the National Transport Authority and Transport Infrastructure Ireland that the proposed development (planning application Ref. D18A/0257) is excessive in terms of its catchment and will undermine investment in the strategic road network (M50 and Junction 15).</p> <p>A number of amendments to the Draft Plan are sought:</p> <ul style="list-style-type: none"> • Include a policy which refers to the need to protect Junction 15 of the M50 from further large scale retail and leisure development at The Park. • Policy BELAP RET₁₃ - Neighbourhood Centre – reference to <i>'...a net retail floorspace cap of 6,000sq.m...'</i> should be removed and replaced with a statement that <i>'...the level of retail floorspace for a neighbourhood centre should be to service local needs...'</i>. The reference to <i>'...a local leisure facility'</i> should also be removed. • In relation to BELAP RET₁₄ – Retail Warehousing – the submission seeks additional narrative around placing the onus on the applicant for further retail warehousing provision to demonstrate that the type of retail use proposed is restricted 	Bo84	<p>Specific Local Objective No. 131 of the current County Development Plan 2016-2022 states <i>'To provide for the development of a Neighbourhood Centre in the north-east 'quadrant' of the Park, Carrickmines, with a net retail floorspace cap of 6000 sq.m. and a leisure facility, which will help meet the existing and future retail and leisure needs of the growth areas of Carrickmines, Steppaside-Ballyogan and Kiltiernan-Glenamuck.'</i></p> <p>The Ballyogan and Environs LAP which lies below the County Development Plan in the hierarchy of statutory spatial plans is, consequently, required to be consistent with the County Development Plan. Removing references to <i>'...a net retail floorspace cap of 6,000sq.m...'</i> and <i>'...a leisure facility'</i> would render the LAP inconsistent with the County Development Plan. The references in question would first require to be removed from the County Development Plan before they could be removed from the LAP.</p> <p>In relation to Policy BELAP RET₁₄ – Retail Warehousing, it is not considered necessary to insert additional narrative requiring an Applicant for permission to demonstrate the type of retail use proposed is restricted to 'bulky goods'. The definitions for 'retail warehouse' - <i>'A large single-level store specialising in the sale of bulky household goods such as carpets, furniture and electrical goods, and bulky DIY items, catering mainly for car-borne customers.'</i> – and 'bulky goods' are clearly set out in the <i>'Retail Planning Guidelines for Planning Authorities'</i>. The DLR County Development Plan 2016-2022 states that <i>'The 'Retail Planning Guidelines for Planning Authorities' (2012), recommend that the retail floorspace in any given retail warehouse unit be devoted to: • ancillary products associated with bulky goods and/or • non-bulky durables should not exceed 20%. In addition, such space shall be clearly delineated on the planning application drawings to facilitate monitoring and enforcement. This guidance will be adhered to in relation to future Retail Parks and Retail Warehouse developments in the County.'</i> A planning condition reflecting same was attached to the Notification of Decision to Grant Planning Permission for a Neighbourhood Centre at The Park, Ref. D18A/0257, currently under Appeal to An Bord Pleanála.</p>

Key Issue	Sub. No.	Executive's Response & Recommendation
<p>to genuinely 'bulky goods'.</p> <ul style="list-style-type: none"> Submission critical that policy position relating to the primary purpose of the lands at the Park, Carrickmines for employment use is not being applied in practice and points to breakdown by use of planning application Ref. D18A/0257 where employment uses account for only 29%. 		<p>In terms of employment uses, due regard was had to the Draft Ballyogan and Environs LAP when assessing planning application Ref. D18A/0257.</p> <p>Recommendation No change to the Draft Plan.</p>

7. Built Heritage and Archaeology

Key Issue	Sub. No.	Executive's Response & Recommendation
i. Submission suggests that notices and plaques should be erected in the area to promote the area's heritage/history.	Bo40	The 'fine grain' nature of the request is effectively an operational/management matter and not considered to be a Local Area Plan issue. Recommendation No change to the Draft Plan.

8. Community Facilities

Key Issue	Sub. No.	Executive's Response & Recommendation
<p>i. Concerns around the lack of engagement facilities for youths and pre-teens. Submissions highlights the importance of providing amenities for young people.</p>	<p>Bo05 Bo08 Bo13 Bo32 Bo40 Bo72</p>	<p>In relation to community infrastructure, 'Policy SI7: New Development Areas' of the current 'overarching' County Development Plan states '<i>It is Council policy to ensure that proper community infrastructure and complementary neighbourhood facilities are provided concurrently with the development of new residential growth nodes in the County.</i>' The Council recognises that facilities which cater for social and community needs are an essential component in developing sustainable communities. Meeting halls, community centres, schools, libraries, health centres, community playgrounds etc. provide a communal resource through which residents can gain information, education, medical and/or welfare assistance and social contact. In a similar vein, Policy OSR10: Sports and Recreational Facilities, states that it is Council policy '<i>...to promote the provision and management of high quality sporting and recreational infrastructure throughout the County and to ensure that the particular needs of different groups are incorporated...'</i>.</p> <p>These guiding principles and imperatives set out in the County Development Plan have been fully and comprehensively embedded into the Draft BELAP and there is a suite of both strategic and site-specific policies in the Draft Plan aimed at delivering tangible community, sport and recreational infrastructure. Such policies include, <i>inter alia</i>:</p> <p>BELAP COM₁ - To advance (now committed) Phase 2 of Samuel Beckett Civic Campus that will include additional sports facilities, meeting rooms, a library and a swimming pool. BELAP COM₃ - Requiring provision of multi-purpose community rooms for residential applications of greater than 50 units. BELAP COM₅ - To promote the use and access to school facilities after school teaching hours, at weekends and school holidays by the wider community. BELAP ENV₇ – To improve and/or develop 'green' pedestrian and cycle routes within and adjacent to parkland and amenity areas. BELAP ENV₈ – To support development of supplementary sports facilities at the 8 Acre Field facility off the Enniskerry Road. BELAP ENV₁₀ – Promote the provision of a playing pitch at Racecourse South.</p> <p>Finally, Policy BELAP RET₁₃ provides for the development of a Neighbourhood Centre at The Park, Carrickmines to include both retail uses and a leisure facility which will help meet retail and leisure needs of the growth areas of Carrickmines, Stepside-Ballyogan and Kiltiernan-Glenamuck. Planning permission was granted by Dún Laoghaire-Rathdown in April 2019 (DLR Ref. D18A/0257) for just such a development but the permission is currently the subject of Appeal to An Bord Pleanála (ABP Ref. 304396).</p> <p>Recommendation No change to the Draft Plan.</p>
<p>ii. Submission seeks accommodation and investment for the local scout troop. Submission supports the work of the local scout troop in securing permanent den facilities.</p>	<p>Bo08 Bo67</p>	<p>The identification of a site or premises for the local scout troop is not considered to be a Local Area Plan issue. A suite of both strategic and site-specific policies aimed at delivering tangible community, sport and recreational infrastructure have been included in the Draft Plan as set out above in Section 8(i).</p>

Key Issue	Sub. No.	Executive's Response & Recommendation
		<p>Recommendation No change to the Draft Plan.</p>
<p>iii. Submission comments that the area is serviced by poor playground facilities. Questions whether there is further scope to improve the playground at Samuel Beckett Civic Campus.</p>	B032	<p>The children's playground and skate area at the Samuel Beckett Civic Campus only opened in 2016. There are no current proposals for expansion of the playground.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>iv. Submission queries where future resident's children will go to school.</p>	B051	<p>As part of the preparation of the Draft LAP, the Planning and Building Unit of the Department of Education and Skills was consulted on existing and anticipated capacity issues in respect of school place provision at both primary and post-primary level within the BELAP area. Subsequent to these discussions the Draft Plan has identified three school sites, as identified on Figure 11.1, and supported by Policy BELAP COM₄ – School Provision: <i>'To continue to work with the Department of Education and Skills to ensure the timely delivery of Primary and Post-Primary schools in the BELAP area. Three school sites have been identified within the BELAP area at Kilgobbin South, Glencairn North, and Racecourse South as shown on Figure 11.1.'</i> In addition to these designations a planning application has been made for a post-primary school adjacent to the Holy Trinity National School in the Mimosa-Levmoss Neighbourhood (Ref. D18A/1171)</p> <p>Recommendation No change to the Draft Plan.</p>
<p>v. Submissions request that the Draft BELAP be amended to remove Policy BELAP COM₄ from the Glencairn North site. Concerns are raised as to the appropriateness of such a designation at the site based on a number of grounds including, <i>inter alia</i>:</p> <ul style="list-style-type: none"> • Significant existing and planned education facilities in the area; • Site selection; • The lack of discussion with landowners; • Engineering and land use issues; • Traffic safety / access issues; • The delivery of additional Specific Local Objectives at the site – namely RES₄ and RES₈. • The efficient utilisation of strategically located lands <p>Submission includes a technical note highlighting a number of transportation concerns and civil and structural engineering difficulties.</p>	B077 B083	<p>The Executive does not agree with the requests contained in the submissions to remove Policy BELAP COM₄ from the Glencairn North site.</p> <p>From the outset, it is highlighted that the Council liaises with the Department of Education and Skills on an on-going basis with regard to school provision, both within the BELAP area and across the wider County. As set out in the Draft LAP the Department advised that, <i>'...in addition to the current school provision, and the post-primary school for which permission has been sought, and on the basis of the population projections provided by DLR, that one additional post-primary school and potentially up to three additional primary schools would be needed'</i>. It is re-affirmed that the current planning application for a post-primary school adjacent to the Holy Trinity National School (Ref. D18A/1171), relates to existing latent demand, and not demand based on future population growth within the Plan area. The identified requirements for a minimum of an additional 3 no. school sites in the Draft BELAP Plan are independent of previously established schools, the current proposal for a post-primary school adjacent to Holy Cross National School, and also of other school site requirements outside the boundary of the BELAP.</p> <p>The Draft Plan does not specify whether the three identified school sites are intended for primary or post-primary schools. In this regard the Draft Plan notes that, <i>'It is proposed to work in conjunction with developers and the DES to ascertain the most suitable location of these site for a second post-primary school...'</i>. Thus, whether the school is of</p>

Key Issue	Sub. No.	Executive's Response & Recommendation
		<p>primary or post-primary scale will be for the Department of Education and Skills to determine as the BELAP area continues to evolve and grow.</p> <p>The Department's requirement for additional school sites within the BELAP area reflects the significant planned residential growth planned, and the spatial designation of same reflects an appropriate distribution in the context of both existing and identified residential growth areas. In the context of Glencairn North it is noted that An Bord Pleanála recently (April 2019) granted a SHD planning application for significant residential development of 341 no. units at lands adjacent to Glencairn House (ABP Ref. 301715) immediately to the east of the site, while undeveloped residential zoned lands lie immediately to the west.</p> <p>In terms of site-specific constraints at Glencairn North, in the context of existing Department of Education standards for school sites, it should be noted that the minimum school site size requirements referenced in the submission are largely outdated – particularly in the context of the built-up area of Metropolitan Dublin, where undeveloped, flat, ready-to-go greenfield sites are in very limited supply. It is now generally accepted that the Department would assess each site on its merits, with appropriate consideration given to site constraints, and consideration provided for alternative design solutions as appropriate. As part of the Development Management process, the Department will engage with the Local Authority and the relevant landowner/developer at scheme design stage to establish the required school site area and configuration in the context of the overall development of the lands. In terms of the detailed traffic safety and access concerns raised, it is noted that the lands are zoned for development, and as such there is a general presumption towards the land in question being developed, irrespective of the use in question. Any proposals brought forward at the lands, be that education or residential, would be required to satisfy traffic safety and access issues and the detailed assessment of same would be undertaken through the Development Management process.</p> <p>In the context of additional policy objectives at the Glencairn North site - namely Specific Policy Objectives RES₄ – Locations for Higher Buildings; Policy BELAP RES8-Build to Rent; and the 'Long Term Road Objective' for a link road across the M50 – it is considered that an appropriate design solution could be delivered at the site that achieves an appropriate balance of these policy objectives in tandem with the delivery of Policy BELAP COM₄ – School Provision.</p> <p>In response to the comments regarding the efficient utilisation of strategically located lands, it is important to recognise the context in which each of the 3 no. designated school sites included in the Draft LAP are required. The Ballyogan and Environs LAP makes provision for significant residential growth, at sites which could all reasonably be considered 'strategically located', within proximity of the Luas Green Line corridor. In the context of sustainable development, it is important that the BELAP makes appropriate provision for educational infrastructure to support the significant anticipated residential growth to ensure that capacity will exist for the future children of the area to attend school locally. It is thus considered that the designation of the school site at Glencairn North represents an appropriate utilisation of the lands in the context of the proper and sustainable development of the area.</p> <p>Recommendation No change to the Draft Plan.</p>

Key Issue	Sub. No.	Executive's Response & Recommendation
vi. Submission requests that new housing developments should meet their greenspace requirements on-site and not through proximity to other estates existing green spaces.	B073	<p>The assessment of future proposals for development, and associated open space provision, will be assessed in accordance with County Development Plan standards, appropriate national policy guidance, and further guidance set out in the Draft LAP.</p> <p>Recommendation No change to the Draft Plan.</p>

9. Leisure and Environment

Key Issue	Sub. No.	Executive's Response & Recommendation
<p>i. Submissions request more parks / green spaces for the area. Submissions question when the proposed Jamestown Park will be accessible to the public.</p>	<p>Bo13 Bo32 Bo51 Bo61 Bo73</p>	<p>The Draft Plan includes a range of policies that support open space provision and improved sports facilities (see BELAP ENV2, ENV3, ENV4, ENV5, ENV9 and ENV10).</p> <p>With regard to Jamestown Park, remediation works at the former landfill have now largely been completed. A Masterplan is currently being prepared for Jamestown Park which will allow the lands to be developed on an incremental basis as a recreational facility which will offer significant passive and recreational opportunities for the community still evolving in the BELAP and environs area. As a precursor, DLR Parks Department have committed to a major tree planting of native species across key areas of the park in the 2019/2020 planting season.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>ii. Submissions raise concerns regarding the loss of natural green space and biodiversity as a result of ongoing development in the area.</p> <p>Submissions support increased tree planting. Requests that the Ballyogan Landfill site is returned back to nature with the re-instatement of native trees and shrubs.</p>	<p>Bo13 Bo40 Bo50 Bo56 Bo62</p>	<p>Much of the BELAP area has been zoned for residential development for a considerable period of time (over twenty years) and significant state/public infrastructural funding and resources have been invested in the BELAP and Stepside areas to unlock the residential development potential of these lands. In this context, it is inevitable that a loss of natural green space and biodiversity will occur as the area develops. Notwithstanding, it is highlighted that the overarching 'parent' County Development Plan, to which the Draft LAP is 'subservient' to, and required to be fully consistent with, sets out a plethora of policies to protect landscape, natural heritage and biodiversity (see Chapter 4 of the County Development Plan.</p> <p>As set out in Section 9(i) above, the Council is committed to repurposing the former Ballyogan Landfill as a new 62 hectare public park (Jamestown Park). A Masterplan is currently being prepared for Jamestown Park which will allow the lands to be developed on an incremental basis. As a precursor, DLR Parks Department have committed to a major tree planting of native species across key areas of the park in the 2019/2020 planting season.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>iii. Submission states that an effort should be made to preserve mature trees.</p>	<p>Bo40</p>	<p>There are a number of designated County Development Plan Objectives within the BELAP area which seek '<i>To protect and preserve trees and woodlands</i>'.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>iv. Submission requests that the undeveloped lands adjacent to Mimosa Hall should be used as a dog friendly perk.</p>	<p>Bo40</p>	<p>The Executive does not agree with the submission. The lands in question are zoned '<i>Objective A – To protect and/or improve residential amenity</i>', and a dog park would represent a significant underutilisation of said lands. It should be noted that a 'Dogs-Off-Leash' area has been identified as part of the proposals for future use at nearby Fernhill Park.</p>

Key Issue	Sub. No.	Executive's Response & Recommendation
		<p>Recommendation No change to the Draft Plan.</p>
<p>v. The submission by the Department of Culture, Heritage and the Gaeltacht suggests that 'environment' should be given greater prominence in Chapter 9 – Leisure and Environment. Submission notes that Section 9.1.7 deals with natural heritage and states the area is rich in fauna and flora, however no references are given to allow policy to be developed in relation to these natural heritage assets.</p> <p>Comments that the Habitat Survey referred to in the SEA appears to be over 10 years old and that no protected mammal surveys (bats, otter, badger) appear to have been carried out. Seeks a commitment that habitat and protected mammal surveys of the Plan area will be carried out within the lifetime of the Plan.</p> <p>Critical of three policies relating to Green Infrastructure which primarily address improving pedestrian and cycle links. While generally welcomed as a positive contribution towards sustainable travel in the Plan area it is important to differentiate between the primary function – the movement of people – and any secondary benefits arising from the development and upgrading of the pedestrian/cycle network.</p> <p>Submission notes that while pollinators are mentioned in the context of the proposed Masterplan for Jamestown Park, there appears to be no wider commitment within the LAP to manage lands in accordance with the All-Ireland Pollinator Plan 2015-2020.</p>	<p>Bo47</p>	<p>The submission does not appear to have recognised or acknowledged the context of the hierarchy of statutory spatial plans and that Local Area Plans are 'subserving to' and required to be fully consistent with the overarching 'parent' County Development Plan (CDP) – in this case the 2016-2022 DLR CDP.</p> <p>Section 4.1 of the CDP – Landscape, Natural Heritage and Biodiversity contains 36 no. policy objectives, the majority of which are strategic, and consequently have County-wide application e.g. preservation of Landscape Character Areas, High Amenity Zones, Coastal Zone Management, Protection of Natural Heritage and Environment, Habitats Directive, Biodiversity Plans, Designated Sites, County-wide Ecological Network, Hedgerows etc. Section 4.2 contains a further 15 no. policies relating to open space and recreation. It is noted that the Department of Arts, Heritage and the Gaeltacht's submission on the Draft CDP (March – May 2015) stated that, '<i>The Department welcomes the strong policies in the Plan to protect natural heritage, protected sites and biodiversity</i>'. It is thus considered that the Department's comments are balanced by the significant number of environmental policies contained in the County Development Plan.</p> <p>In relation to the request for a commitment to update Habitat Survey of the Plan area it is proposed the Draft Plan be amended to incorporate same.</p> <p>The references to separating out the primary function and any potential secondary benefits arising from the introduction of both improved and new pedestrian cycle networks throughout the Plan area are acknowledged. While retaining the crossing points of the M50 within the final LAP (see Policy BELAP MOV12 – New Linkages), it is proposed to remove Policy BELAP ENV 6 – M50 Crossings from the Section 'Green Infrastructure'. It is proposed the Draft Plan be amended to reflect same.</p> <p>In relation to pollinators the Council became an All-Ireland Pollinator Plan Partner in mid-March 2019. In becoming a Pollinator Plan Partner DLR agrees to support the ethos of the All-Ireland Pollinator Plan. DLR is currently rolling out – at a County-wide level – a suite of pollinator friendly actions including developing Nature Wildlife areas (of which there are three in the BELAP area), a 'Slow to Mow' campaign, improving wildlife corridors, reduction of chemical use for weed control, and requiring pollinator areas in emerging new developments. As the ethos of the All-Ireland Pollinator Plan is being rolled out across the entirety of DLR on a County-wide basis it is considered unnecessary to duplicate this support in finer-grain local plans and projects.</p> <p>Recommendation Amend the Draft Plan as follows:</p> <p>Remove Policy BELAP ENV6 - M50 crossings (and alter subsequent policy numbering as appropriate)</p> <p>Amend Policy BELAP ENV7 (now 6) – Routes through Parkland – as follows:</p>

Key Issue	Sub. No.	Executive's Response & Recommendation
		<p>To improve, enhance and develop green pedestrian and cycle routes within and adjacent to parkland and amenity areas to create a network of green corridors across the Plan area.</p> <p>Add new policy to Section 9.3.6 Environmental Protection Policy as follows:</p> <p>Policy BELAP ENV13 – Habitats Survey: Planning applications for development in areas of environmental sensitivity will be required to provide an updated habitat and protected mammal survey.</p>
<p>vi. Submission expresses surprise Draft Plan makes no reference to the DLR Climate Change Action Plan. The Draft LAP should cross-reference objectives included in the DLR Climate Change Action Plan.</p>	<p>Bo67</p>	<p>The Draft DLR Climate Change Action Plan has universal application across the entire County. The various overarching measures and actions – including use of alternative and renewable energy sources, sustainable built environment, sustainable transport through reductions in the use of the private car, flood risk assessment, and biodiversity are all component elements in the dynamic of spatial land use planning and have application across the whole of the DLR. It is noted, however, that the Climate Change Action Plan is currently in Draft format and has not, to date, been finalised.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>vii. Submission recommends that an illustration be included that identifies a single piece of integrated green infrastructure, taking in Jamestown Park, the Eco Park at Clay Farm and the proposed parkland at Quadrant 3 of The Park.</p>	<p>Bo82</p>	<p>The contents of the submission are noted. The Draft BELAP includes a number of Figures that illustrate future open space/park provision and green infrastructure and associated text referencing same. It is not considered necessary to incorporate an additional Figure as suggested in the submission.</p> <p>Recommendation No change to the Draft Plan.</p>

10. Sustainable Infrastructure

Key Issue	Sub. No.	Executive's Response & Recommendation
<p>i. Submissions raise concerns in relation to the assessment of flood risk. Submission contends proposals for development on floodplains are being facilitated without due consideration of the effects on both existing residential properties and potential purchasers.</p>	<p>Bo38 Bo73</p>	<p>Planning applications for all developments on lands at risk of flooding in the built up area are required to satisfy a whole series of very stringent and comprehensive obligations and requirements, including:</p> <ul style="list-style-type: none"> • The Strategic Flood Risk Assessment of the DLR County Development Plan (Appendix 13). • The Development Management 'Justification Test'. • Flood Risk Assessment in accordance with '<i>The Planning System and Flood Risk Management – Guidelines for Planning Authorities</i>'. • Flood resilient design and statement. • Compliance with the '<i>Greater Dublin Strategic Drainage Strategy</i>' and the inclusion of SuDS. • The adaptive capacity of the development. • Access, egress and emergency plans. <p>It would be inaccurate and misleading to suggest that planning applications in areas at risk of flooding are assessed without rigorous due diligence.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>ii. Submission by ESB acknowledges the significant presence of ESB infrastructure in the BELAP area and confirms the Carrickmines 220KV sub-station is a centre with infrastructure of strategic national importance.</p> <p>The submission welcomes the inclusion of supportive statements in relation to future proposals for the ESB lands at Carrickmines, as set out in Section 6.6.2 of the Draft Plan, '<i>Any future proposals to intensify employment at the Carrickmines Substation site through the rationalisation of the over ground electricity transmission plant will be supported</i>'.</p> <p>ESB have concerns, however, in relation to Policy BELAP Sl12 – Services: '<i>To seek the undergrounding of all electricity, telephone and television cables wherever possible, in the interests of visual amenity</i>', as this is deemed not consistent with the policies and objectives of the '<i>Government Policy Statement on the Strategic Importance of Transmission and Other Energy Infrastructure</i>'.</p>	<p>Bo75</p>	<p>The contents of the submission are noted by the Executive.</p> <p>The 'undergrounding' policy in question raised by the ESB has been included in successive County Development Plans since Dún Laoghaire-Rathdown came into being in 1994. During the mid-to-late nineties there have been a number of notable, significant, and successful undergrounding initiatives in the Stepside / Ballyogan area – including a 110KV line through what is now Belarmine and the removal of a 220KV line through Clay Farm. The narrative included in Policy BELAP Sl12 states '<i>where possible</i>' and in no way handcuffs or obliges ESB.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>iii. Submission recommends the LAP should include additional text regarding the development of lands which are zoned for development and which fall within a flood risk zone.</p>	<p>Bo82</p>	<p>The detailed technical appraisal of flood risk in the Plan area, and the associated mapping, is set out in the Strategic Flood Risk Assessment (SFRA), which accompanies the Draft LAP as a standalone Appendix. The SFRA clearly sets out the obligations and imperatives associated with Flood Risk Management within the BELAP area. It is not</p>

Key Issue	Sub. No.	Executive's Response & Recommendation
		<p>considered necessary to include additional text as suggested in the submission.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>iv. The submission from Irish Water states no objection to the proposals based on the plans and particulars included in the consultation documents and makes the following observations:</p> <ul style="list-style-type: none"> • With regard to water supply it is not envisaged any strategic networks would be required for this area. • The presence of the 33" Varray to Stillorgan watermain will have construction set-back requirements. • With regard to the sewer network Irish Water are currently preparing a Drainage Area Plan for the Bray-Shanganagh catchment which includes the BELAP area. As development progresses Irish Water will have to model required demand against latest network demands. New connections may be assigned on a first come, first served basis until any necessary capital works are completed. • Local works will be developer-led. 	<p>Bog6</p>	<p>The Executive notes and welcomes the submission.</p> <p>Recommendation No change to the Draft Plan.</p>

11. Specific Local Objectives

Key Issue	Sub. No.	Executive’s Response & Recommendation
<p>i. Submission recommends the Specific Local Objectives Map is reviewed in the interest of clarity.</p>	<p>Bo49</p>	<p>In terms of Specific Local Objectives, these are appropriately identified both in the main body text of the Draft LAP and represented spatially on the Specific Local Objectives Map, shown at Figure 11.1.</p> <p>Recommendation No change to the Draft Plan.</p>

12 Site Development Frameworks

Key Issue	Sub. No.	Executive's Response & Recommendation
Site Development Framework: Racecourse South		
<p>i. Submission suggests that the Site Development Framework for Racecourse South should incorporate the lands to the south of the M50 zoned for residential development.</p>	Bo35	<p>The Executive does not agree with the submission. While it is acknowledged that the 'preferred location' for the delivery of a pedestrian and cyclist route across the M50, from the Racecourse South SDF to lands south of the M50, traverses the northern extents of the site in question, it is noted that part of the site has distinct physical constraints that includes flooding, as set out in the Strategic Flood Risk Statement of the Draft LAP.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>ii. The submission relates to Leopardstown racecourse and its immediate environs.</p> <p>The submission references the LAP imperative around improving permeability both within the LAP boundary and connectivity to adjoining 'destination' areas like Sandyford Business District and Cherrywood. The submission expresses reservations in relation to some of the identified links.</p> <p>In relation to Link 12, the submission notes the bridge over the M50 corridor would have to be opened up to general public use. The submission advises that the bridge was constructed as part of the South Eastern Motorway Project to provide vehicular and pedestrian access for racecourse patrons on race days (23 no. per annum) from the 'car park' on the south side of the motorway corridor. The submission then moves on to list a number of engineering/legal/procedural impediments that would have to be resolved in order for public access to be facilitated.</p> <p>Submission states that approx. 42% of the SDF accommodates one of the two 'main' race day car parks and comments that references to 'overflow' and the use of the car park as intermittent and infrequent are disingenuous. States that the car park is used every meeting and that it would not be possible to stage any of the bigger meeting without the car park in question.</p> <p>In relation to the imperative of a 'sprint track' the submission refers to a 2002 planning permission granted for the construction of a 7 furlong sprint track, but on foot of a subsequent permission granted</p>	Bo65	<p>Notwithstanding the reservations and impediments posited in the submission in relation to the 'Racecourse Bridge', it currently remains the one and only M50 crossing between Junctions 14 and 15. To suggest that such a strategic and expensive piece of infrastructure should be limited to 23 no. days use per year – in the context of its capacity to create linkages between a developing residential area separated by the motorway corridor from the principle employment node in the County of Dún Laoghaire-Rathdown - is not good planning and use of infrastructure. In this regard, the Executive will continue to work with Horse Racing Ireland, a State body, in relation to facilitating public accessibility across the bridge to significantly improve north-south pedestrian/cycle permeability across the M50 corridor.</p> <p>In relation to the submission references to (i) '<i>The area that is the subject of the Development Framework is a substantial part of the overall racecourse estate</i>', and (ii) '<i>Any inference therefore that this car parking is somehow dispensable to facilitate the development of the land solely for other non-Racecourse uses would be incorrect and misleading.</i>', site visits undertaken by the Planning Authority during race meetings suggest that the use of the car park is limited, and in this regard it is considered an underutilisation of these residential zoned lands.</p> <p>In relation to the 7 furlong sprint track issue, this has a very chequered history - as outlined in the submission which posits that the retrofitting of a sprint track now is fundamental to enhancing Leopardstown Racecourses status on the international horseracing circuit – albeit that it was specifically omitted by HRI in a subsequent 'follow-up' planning application in 2005.</p> <p>Irrespective of the above narrative the Racecourse South lands:</p> <ul style="list-style-type: none"> • Have been zoned residential since 1998; • Have been effectively dormant and underutilised since that time; • Are fully and comprehensively serviced in terms of water, drainage and roads infrastructure; • Have the benefit of a Luas stop within the SDF area (not opened but fully in place); • Lie within the Dublin Metropolitan Area boundary on a RSES Strategic Transport Corridor (MetroLink / Luas Green Line corridor). • Are readily capable of providing residential development of scale in the short-to-medium term.

Key Issue	Sub. No.	Executive's Response & Recommendation
<p>in 2005, this sprint track was omitted by Horse Racing Ireland (HRI). The submission states that '<i>Notwithstanding, providing a sprint track at Leopardstown has never been completely discounted</i>' and goes on to suggest an emerging resurrection of the track proposal. Given HRI's long-term strategic plan for the lands, the submission questions the deliverability of pedestrian/cycle links 10 and 11.</p> <p>The submission outlines a number of requested amendments to the Draft Plan reflecting the above.</p>		<p>In conclusion, the lands in question are zoned residential; are serviced in terms of water and drainage; are on a key rail-based public transport corridor; and have been specifically identified in the Eastern and Midlands Region RSES as an area to deliver residential development of scale. The area in question has been bereft and undeveloped since its rezoning in 1998 and its intermittent and (very) periodic use as a car park (23 no. days per calendar year) is completely untenable and unsustainable. The lands are zoned residential and provide an optimum location for residential development proximate to quality public transport, as provided for in the Site Development Framework for Racecourse South, included in the Draft LAP.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>iii. The LAP offers an opportunity for master planning of the residual undeveloped residential lands in the BELAP area.</p>	Bo67	<p>The Executive notes the submission.</p> <p>The Site Development Frameworks included in the Draft Plan for Racecourse South and Kilgobbin set out a range of policies and principles that any planning application within these areas will be expected to comply with. The SDF's are intended to be specific enough to secure the objectives of sustainable development, while flexible enough to allow for a range of acceptable design solutions. Draft Plan Policy BELAP SDF1 – Masterplan obliges the preparation of a Masterplan in any planning application for the Racecourse South lands. Draft Plan Policies SDF2 and SDF4 requires all planning applications at the SDF sites to be accompanied by a 'Consistency Statement' detailing how each of the Guiding Principles are to be delivered.</p> <p>Recommendation No change to the Draft Plan.</p>
Site Development Framework: Kilgobbin		
<p>i. The submission acknowledges that, with the pending development of the Clay Farm Distributor Loop Road, the current access arrangements from their property to Kilgobbin Road will be closed off and lost.</p> <p>Suggests that some landowners within the Kilgobbin Site Development Framework have been consulted during the drafting of BELAP. Notes that they have not been contacted by DLR in relation to alternative access arrangements and queries what provision might be made for them.</p>	Bo07	<p>Standard practice and protocols in relation to accesses being lost as a consequence of new road construction require the promoters of the project to make provision for alternative access arrangements for the discommoded party. The Kilgobbin SDF area is at a very early stage in its evolution and detailed design in relation to the Distributor Loop Road in the vicinity of the author's property is still to be crystallised. As matters advance DLR will be able to ensure alternative access arrangements for the property in question through the development management process.</p> <p>By way of public consultation any person can make submissions regarding the Draft Plan.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>ii. Submission relates to Oldtown House (a Protected Structure), its</p>	Bo74	<p>Oldtown House is but one of a number of individual properties in the BELAP area accessing directly onto Kilgobbin</p>

Key Issue	Sub. No.	Executive's Response & Recommendation
<p>associated curtilage, and undeveloped greenfield/agricultural lands immediately to the east of the property. The submission supports the density bands proposed in the Site Development Framework.</p> <p>The submission notes that Oldtown House has existing vehicular access onto Kilgobbin Road and submits that development at the 'core' Oldtown House curtilage should be allowed to avail of that existing access, subject to detailed design and assessment of the use of same. Submission seeks to have same recognised through text and illustrations in the Site Development Framework.</p> <p>Notes that the indicative alignment of the Loop Road in Figure 12.8 is not consistent with the alignment indicated in the County Development Plan Zoning Map 6 and submits that the alignment should be closer to that identified in the County Development Plan, which has regard to archaeological features in the area. The submission includes a diagram suggesting proposed re-alignment.</p> <p>The submission welcomes indication on Figure 12.8 of accesses from the Loop Road to adjoining development sites. Recommends inclusion of narrative to include requirement for road connections to be provided to serve development of the subject site.</p>		<p>Road. It would be inappropriate to afford Oldtown House and adjacent lands some special status in relation to the Site Development Framework regarding access arrangements. The most appropriate and optimum access arrangement for these lands is set out in the Kilgobbin Site Development Framework (Section 12) that states '<i>Vehicular access for all new residential development within the SDF will be provided via the Loop Road and/or its feeder routes.</i>'. Regard should also be had to the 2016-2022 County Development Plan 'Long Term Road Objective' to retain Kilgobbin Road, between Ballyogan Road and Kilgobbin Lane, '<i>...as an attractive 'country' road</i>'.</p> <p>All County Development Plan Maps include quite clear caveats that any road proposals shown are indicative only and could be subject to change/amendments as detailed design is advanced. The Loop Road alignment shown in the current 2016-2022 County Development Plan is effectively a legacy from the non-statutory Stepside Action Area Plan (SAAP) drafted in 1999 prior to the publication of the Planning and Development Act 2000, which introduced for the first time, statutory Local Area Plans. The alignment shown in the SAAP was extremely notional and without the benefit of topographical or engineering analysis and was simply shown to embed the principle of there being two signal controlled junctions on the Ballyogan Road with a loop road connecting both to facilitate shared loading at the junctions and to provide options in terms of emergency access. It is acknowledged, however, that Figures 12.4 and 12.8 do not include a caveat similar to that contained in the County Development Plan, and it is thus recommended that the Draft Plan be amended to reflect same.</p> <p>In relation to providing supplementary narrative in relation to the proposed key vehicular access routes from the Loop Road this is considered unnecessary. Figure 12.8 is quite transparent in its intent in this regard.</p> <p>Recommendation Amend the Draft Plan as follows:</p> <p>Add the following text the legend of Figures 12.4 and 12.8:</p> <p>The lines of the road proposals shown are indicative only and may be subject to change as detailed design is advanced.</p>
<p>iii. Submission states that the development of the Kilgobbin lands is dependent on the construction of the Clay Farm Loop Road which is a 'Six-Year Road Objective' in the 2016-2022 County Development Plan. Submission queries efficacy of the Development Management process to deliver the Loop Road and the timeline for same.</p> <p>Submission seeks a temporary access from Kilgobbin Road to enable a first phase of development at the Lawless lands – up to 25% of the overall development capacity of the lands equivalent to c. 150 dwellings.</p>	<p>Bo79 Bo85</p>	<p>The Clay Farm Loop Road project was a successful bidder in the competition for the Local Infrastructure Housing Activation Fund (LIHAF). All owners whose lands are traversed by the Loop Road – including the authors of submissions Bo79 and Bo85 – were signatories to that bid application document.</p> <p>The Loop Road will be delivered incrementally as individual land parcels are opened up for development through the Development Management process. The Clay Farm Phase 1 section of the road has been completed and construction of the Phase 2 section of the road has recently commenced. Discussions between Council officials and the various landowners involved are continuing and it is anticipated that the Loop Road can be completed within the 'Six-Year Road Objective' timeline of the County Development Plan. The actual detail and nature of the Loop Road as it passes over the 'top' or centre of the Loop will evolve and be finessed through the Development Management system but will be influenced by the principles of DMURS.</p>

Key Issue	Sub. No.	Executive's Response & Recommendation
<p>Submission proposes altering density band Res A (45-55 dph) to 35-55 dph to take cognisance of the relationship to Oldtown House (a Protected Structure), the adjoining Kilgobbin Heights estate and distance from the Luas. Residential density band B should be reduced from 55-80dph to 45-80dph.</p> <p>Submission notes that there is a lack of clarity in relation to the proposed school site as to whether (i) it will be of primary or post primary scale, and (ii) if all of the proposed school site is to be provided at the subject lands.</p> <p>Submission notes no specific objectives are proposed in respect of the detailed design and nature of the Loop Road.</p> <p>Notes archaeological remains have been found at the proposed location for the school site and speculates on the possibility of further remains in the vicinity which could influence the final location of the school.</p>		<p>The most appropriate and optimum access arrangement for these lands is set out in the Site Development Framework. Regard should also be had to the current County Development Plan 'Long Term Road Objective' to retain Kilgobbin Road, between Ballyogan Road and Kilgobbin Lane, '...as an attractive 'country' road'.</p> <p>Having regard to national policy imperatives and guidelines in relation to density and building height, the density bands set out for the overall site are considered and robust. The Site Development Framework states '<i>Minor deviations from these ranges may be considered, at the discretion of the Planning Authority, where it can be demonstrated that the full range of guiding principles set out in the SDF can be delivered. The mapping of residential density bands shown on Figure 12.8 is indicative only and the boundaries between these lands are not intended to be absolute</i>'. The SDF also acknowledges that '<i>Any development in proximity of Oldtown House will provide for the sensitive protection of the Protected Structure</i>'. This may have consequences for density consideration in the environs of Oldtown House.</p> <p>The indicative site for the proposed school is shown on Figure 12.8. It is not absolute and could be subject to minor deviations but the principle of proximity to the adjoining Greenway must be adhered to. It is reaffirmed that the school site will be wholly within the SDF boundary. Whether the school is of primary or post primary scale will be for the Department of Education and Skills to determine as the BELAP area continues to evolve and grow.</p> <p>The references to the archaeological remains are noted but the Record of Monuments and Places symbol is at a remove from the proposed school site. The references to the possibility of further remains in the Kilgobbin lands is purely speculative and can only be validated following detailed investigation.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>iv. Submission requests that a prescriptive Site Development Framework is not provided for the Kilgobbin area so that it can be progressed at detailed design stage with the various stakeholders.</p>	B079	<p>The Site Development Framework for Kilgobbin included in the Draft LAP sets out a range of policies and principles that any planning application within the SDF area will be expected to comply with. It is intended to be specific enough to secure the objectives of sustainable development, while flexible enough to allow for a range of acceptable design solutions. It is anticipated that the 'fine grain' detailed design for the future development of the lands would be progressed through the Development Management process.</p> <p>Recommendation No change to the Draft Plan.</p>

Miscellaneous Issues

Key Issue	Sub. No.	Executive's Response & Recommendation
i. Queries why the Glencairn Quarter is so called as the estate is called The Gallops.	Bo04	<p>The Glencairn Quarter encompasses considerably more than simply The Gallops. It also includes Mimosa-Levmoss, Holy Trinity National School, the Leopardstown Valley Shopping Centre and the large Protected Structure at Glencairn House and its attendant grounds.</p> <p>Recommendation No change to the Draft Plan.</p>
ii. Submission raises issues relating to incorrect, inaccurate postal address / location of their property.	Bo07	<p>This is not a Local Area Plan issue.</p> <p>Recommendation No change to the Draft Plan.</p>
iii. Submission requests the incorporation of relevant environment and health actions into the strategic planning of the spatial and built environment of the BELAP area. The submission makes reference to an extensive list of policy and guidance documents.	Bo11	<p>Recent practice by the Environmental Health Service of the Health Service Executive (HSE) in relation to statutory spatial plans has been the submission of a standard multi-faceted 'generic' document covering a diverse suite of subject matter – a significant number of which are not directly Local Area Plan issues – Tobacco Free Ireland; a Healthy Weight for Ireland; National Physical Activity Plan. Of the more 'tangible' elements e.g. Waste; Water; Environmental Noise; Cycle Policy; Transport etc. the submission recommendations namechecks overarching National and/or European policy imperatives- respectively EU Waste Framework Directive; European Communities (Drinking Water) Regulations; Dublin Agglomeration Noise Action Plan; National Cycle Policy Framework and Smarter Travel – all of which are already incorporated and embedded in the policy imperatives and objectives of the DLR County Development Plan 2016-2022.</p> <p>Recommendation No change to the Draft Plan.</p>
iv. Comments on scale of development anticipated in the Plan area over the next 10 years and seeks robust conditions attaching to planning permissions in relation to construction traffic, working hours, keeping local roads clean of debris.	Bo12	<p>The contents of the submission are noted by the Executive. The subject matter while relevant to the future development of the BELAP area is not directly a Local Area Plan issue, but a matter to be controlled and enforced through the Development Management system and processes and is included in the Development Management Chapter of the County Development Plan by which all planning applications will be assessed.</p> <p>Recommendation No change to the Draft Plan.</p>
v. Submission critical of short time allowed for consultation and advocates period be extended. Important to allow communities time to prepare submissions.	Bo67	<p>The timelines associated with the Local Area Plan process – including the various public consultation periods - are set down in statutory legislation which allows no deviation from same.</p> <p>Recommendation No change to the Draft Plan.</p>

Key Issue	Sub. No.	Executive's Response & Recommendation
vi. Submission makes the case for the re-zoning of lands adjacent to Stepside Village to allow for residential development, or alternatively for a retirement village. While it is acknowledged that the subject lands have not been included in the Draft LAP boundary area, it is submitted that the subject lands and contents of the submission will be relevant to a review of the County Development Plan.	B076	<p>The lands in question are located outside of the BELAP area boundary. Re-zoning is not possible under the provisions of a Local Area Plan. Re-zoning would require a variation to the County Development Plan 2016-2022 and would be subject to a separate public consultation process.</p> <p>Recommendation No change to the Draft Plan.</p>

Appendices – Strategic Environmental Assessment Report

Key Issue	Sub. No.	Executive's Response & Recommendation
<p>i. Submission by Environmental Protection Agency (EPA) sets out and clarifies the legislative obligations that Local Authorities must address and/or align with when preparing land-use plans. The submission points to a suite of 'self-service' guidance documents and tools setting out best practice. Specific references to requirements under the Water Framework Directive and the need to ensure alignment with national commitments on climate change mitigation and adaption.</p> <p>Reference is made to a submission from the EPA made at the Local Area Plan Pre-Draft stage.</p>	Boog	<p>The Executive notes the contents of the submission.</p> <p>Policies CC1: National Climate Change Adaption Framework; CC2: Development of National Climate Change Policy and Legislation; and, El2: Wastewater Treatment and Appropriate Assessment incorporated into the 2016-2022 DLR County Development Plan align with and address the stated obligations referenced by the EPA. The BELAP, as a lower order plan 'subservient' to the overarching County Development Plan, is required to be consistent with the policies and objectives of the parent CDP. It is, therefore, unnecessary to duplicate, universal County-wide material already contained in the overarching 'parent' CDP.</p> <p>The reference to the submission made at Pre-Draft stage is noted and its contents were considered in the preparation of the Draft Plan.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>ii. Submission states that the SEA has failed to adequately examine and support the inclusion of a specific reference to '<i>net retail floorspace of 6,000sq.m</i>' for The Park, Carrickmines where no such allocation is made for any other centres.</p>	Bo84	<p>Policy BELAP RET13 – Neighbourhood Centre and its associated text that refers to '<i>...a net retail floorspace cap of 6000sqm</i>' reflects Specific Local Objective 131 contained in the DLR County Development Plan 2016-2022. A full and comprehensive Strategic Environmental Assessment was undertaken for the County Development Plan 2016-2022 as was undertaken for the Draft Ballyogan and Environs Local Area Plan.</p> <p>Recommendation No change to the Draft Plan.</p>

Part 5

Submissions Received

List of Submissions – Numerical Order

Submission Number	Name		Organisation
B001	Roy	Madden	
B002	Kyle	Von Haden	
B003	Fergal	Scolard	Centra, Sandyford Hall
B004	Steve	Brennan	
B005	Elena	Soldatkina	
B006	Aoife	Devereaux	
B007	Mary	White	
B008	Martin	Coughlan	10 th Kilternan Scouts
B009			Environmental Protection Agency
B010			Health and Safety Authority
B011			Health Service Executive (Environmental Health Service)
B012	Marie & Peter	Osvald	
B013			Health Service Executive (Department of Public Health East)
B014			Transport Infrastructure Ireland
B015	Paul	Kenny	
B016	Tim	O’Riordan	
B017	John	McQueirns	
B018	Pamela	McQueirns	
B019	Alfonso	Quaraniello	
B020	Suzanne	Smith	
B021	Jeff	Hoare	
B022	Bernard	McLaughlin	
B023	Jean	Grainger	
B024	Maureen	D’Arcy	
B025	Ian	Kennedy	Kennedy Financial
B026	John	Kavanagh	
B027	Jevgenij	Charcenko	
B028	Marta	Wasiak	
B029	Dara	Kavanagh	

B030	Paul	Bradley	
B031	Siobhan	Maguire	
B032	Lorne	Chedzey	
B033	Triona	Ferriter	
B034	Olwen	McCarthy	
B035	Sean	Parkes	
B036	Ken	Byrne	
B037	Declan	Brady	
B038	Lyn	Kennedy	
B039	Denis	Dowling	
B040	Louise	Connolly	
B041	David	Fogarty	
B042	Sarah	Whelan	
B043	Mary		
B044	Barry	O'Donovan	
	Cherrie	Wade	
B045	Patrick	Downes	
B046	Raymond	O'Malley	Kieran O'Malley & Co. Ltd.
B047			Department of Culture, Heritage and the Gaeltacht
B048	James	Morrison	
B049			MacCabe Durney Barnes on behalf of Park Developments Ltd.
B050	Maeve	O'Doherty	
B051	Kerry	O'Carroll	
B052	Karina	Carroll	
B053	Lochlann	Butler	
B054	Maresa	McCarthy	
B055	Janine	O'Reilly	
B056	Shane	Cullen	
B057	Pamela	Daniel	
B058	Joe	Smith	
B059	Michael	Kilkenny	Local Residents Association

B060	Eileen	Anglim	Ribbonprint
B061	Jane	Anderson	
B062	Paul	Murphy	
B063	Michelle	Kavanagh	
B064	Thomas	Hanlon	
B065			IMG Planning on behalf of Horse Racing Ireland / Leopardstown Club Limited
B066	J	Coen	Green Party
B067	Deirdre	Ni Fhloinn	
B068	Hugh	Brennan	
B069	Shane	Mullen	
B070			Office of the Planning Regulator
B071			McGill Planning Ltd. on behalf of Bowbeck DAC
B072	Agnieszka	Lorek	Sandyford Hall Residents Association John Spain Associates on behalf of Park Developments Electricity Supply Board John Spain Associates on behalf of Park Developments and Castlethorn Construction Corr & Associates Spatial Planning on behalf of George Maloney (Receiver), RSM Ireland John Spain Associates on behalf of Park Developments Conroy Crowe Kelly on behalf of McGarrell Reilly Group
B073	Al	O'Tuathaigh	
B074			
B075			
B076			
B077			
B078			
B079			
B080	Paul & Jackie	Sharpe	
B081	Edel	McDermott	
B082			John Spain Associates on behalf of IPUT plc
B083			John Spain Associates on behalf of Park Developments
B084			BMA Planning on behalf of Dundrum Retail Limited Partnership
B085			Conroy Crowe Kelly on behalf of the Lawless Family
B086	Roisin	Gaughan	Stepaside Business Association
B087	Michael	Fleming	
B088	Caroline	Healy	

B089	Joanne	Cummins	
B090	Kevin	Kennedy	
B091	Lisa	Ecclestone	
B092	Gillian	Daly	
B093	Jonathan	Kerr	
B094	Tina	Kinirons	
B095			National Transport Authority
B096			Irish Water