

**Kiltiernan
Glenamuck**
Draft Local Area
Plan 2013
Manager's Report

August 2013

KILTIERNAN GLENAMUCK LOCAL AREA PLAN

MANAGER'S REPORT

AUGUST 2013

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PART 1

INTRODUCTION

1. Introduction

Statutory Background to the Manager's Report

This Manager's Report has been prepared in accordance with the provisions of Section 20(3) of the Planning and Development Acts, 2000-2010 and states that a report shall:

- (i) List of the persons or bodies who made submissions or observations (i.e. during the public consultation period of the Draft Local Area Plan) (See Appendix A),
- (ii) Summarise the issues raised by the persons in the submissions or observations
- (iii) Contains the opinion of the Manager in relation to the issues raised, and his/her recommendations in relation to the proposed Local Area Plan, taking account of the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.
- (iv) In the case of each Manager within the GDA, a report shall summarise the issues raised and the recommendations made by the National Transport Authority (NTA) and outline the recommendations of the Manager in relation to the manner in which those issues and recommendations should be addressed in the proposed Local Area Plan.

Contents & Format of This Report

Having regard to the provisions of the Planning and Development Acts, 2000-2010, Part 2 of this Manager's Report sets out a summary of the submissions made by the Department of the Environment, Community and Local Government and the NTA and the Manager's response to the issues raised and a recommendation in relation to each issue/observation.

Part 3 provides a summary of the issues raised in each of the submissions received, addressing the submissions from the statutory bodies first, followed by the submissions from the public and the Manager's response to the issues and a recommendation to each submission/observation. Where the Manager makes a recommendation to change or amend the Plan these are set out in **red type**.

Public Consultation

The Draft Kiltiernan Local Area Plan was put on public display on 17th May 2013. Written submissions and/or observations were invited for a 6 week period ending the 28th June 2013. During this public consultation period the Council pursued a proactive approach in an attempt to raise awareness of the Draft Local Area Plan among the citizens of the County and other stakeholders in the form of:

- Detailed public notices placed in the Irish Times and Irish Independent advising of the consultation period, where the Draft Local Area Plan could be accessed, advising of Public Open Day times and dates and inviting submissions up to and including the closing date.
- Two Public Open Days were held where Council Staff were in attendance at the static display in the Kiltiernan Country Market to assist the public and others in their consideration of the Plan. The dates were as follows:
 - Wednesday 29th May (10.00-14.00 and 16.00-20.00)
 - Wednesday 12th June (10.00-14.00 and 16.00-20.00)
- The Draft Local Area Plan was on continuous public display for the duration of the consultation period at the following locations:
 - The Concourse, County Hall, Dún Laoghaire (9.00-17.00)
 - Council Offices, Dundrum Office Park (9.30-12.30 and 13.30-16.30)
 - The Draft Local Area Plan was available to view or download from the Council's website, www.dlrcoco.ie and made available at libraries in Blackrock, Cabinteely, Dalkey, Deansgrange, Dún Laoghaire HQ, Dundrum, Shankill and Stillorgan, both in hard copy and through the free web access facilities available at each library.
- Submissions/observations in respect of the Draft Local Area Plan were accommodated through a number of mediums – hard copy and e-mail.

Submissions Received

The County Manager would like to take this opportunity to thank everyone who took the time to make a submission to the Draft Kiltiernan Glenamuck Local Area Plan, and to particularly thank those who attended the public information sessions.

During the 6-week consultation period a total of **60** no. submissions were received by the Manager.

Next Stage

The Members shall consider the Manager's Report and following consideration the Local Area Plan shall be deemed to be made in accordance with the recommendations of the Manager as set out in the Report, **6 weeks** after the furnishing of same to all the Members of the Authority, unless the Manager, by resolution, decides to vary or modify the Plan otherwise than recommended in the Manager's Report or decides not to make the Plan.

Where, however, the Manager decides to make the plan otherwise than as recommended in the Manager's Report (by way of a material modification / variation), the Manager shall, not later than **3 weeks** after the passing of a resolution, publish notice of the proposed material variation or modification to the Plan. Such a notice shall also state that information on the likely significant effects on the environment of implementing the proposed variation or modification will also be available for inspection and that a submission or observation in relation to such information will also be taken into consideration before the making of any variation or modification.

Not later than **8 weeks** after giving such notice the Manager shall prepare a report on any submissions or observations received further to the notice, and submit the Report to the Members of the Authority for their consideration.

A screening process for Appropriate Assessment was undertaken for the Draft Plan. The screening process determined that a full assessment was not required for the Draft Plan. A Strategic Environmental Assessment 'Environmental Report' accompanies the Draft Plan. In the event that the Manager determines that a Strategic Environmental Assessment and Appropriate Assessment of a proposed *material alteration* to the Draft Plan are required, an extended timeline for the consideration of the amendments will apply.

PART 2

**SUBMISSION BY MINISTER FOR THE ENVIRONMENT, COMMUNITY & LOCAL
GOVERNMENT, THE NATIONAL TRANSPORT AUTHORITY AND THE REGIONAL
AUTHORITY & MANAGER'S RESPONSE AND RECOMMENDATIONS**

Key Issue	Sub. No.	Name	Manager's Response & Recommendation
<p>2. Submission of the Minister of the Environment, Community and Local Government and the NTA</p>			
<p>2.1 The Department notes that the Council has prepared a well presented and legible document, but to ensure clarity suggests that the Draft LAP should also address the following issues:</p> <ul style="list-style-type: none"> • The Draft LAP is not entirely consistent with the area and residential unit numbers in the Core Strategy Table. • A Phasing Plan should be implemented to indicate development proposed for Phase I (the Draft LAP timeframe of 2013-2019) and Phase II/III for the period after 2019. • A building heights map would be useful. 	D051	Department of the Environment, Community and Local Government	<p>Dun Laoghaire-Rathdown's 'Core Strategy' was adopted as a Variation to the County Development Plan in 2011. The Strategy concluded that there was a reasonable equilibrium between the population targets for the County, as outlined in the Regional Planning Guidelines and the quantum of zoned residential land, and the DoECLG concurred with this analysis. The Core Strategy specifically includes the Kiltiernan-Glenamuck Plan area as one of the limited number of 'Key Development Areas' that require to be developed over the lifetime of the Regional Planning Guidelines. The Regional Authority confirm that the Dun Laoghaire-Rathdown's 'Core Strategy' is consistent with the Regional Planning Guidelines.</p> <p>According to the Core Strategy Guidance issued by the Department, the Strategy should <i>"provide the framework for deciding on the scale, phasing and location of new development, having regard to existing services and planned investment over the coming years."</i> The Core Strategy, if it is to have any credibility, must also attempt to forecast, not only of when development may occur relative to the delivery of infrastructure, but also relative to the 'health' of the housing market – for it is the private sector house-building industry that will deliver, in the main, the end-product. The Core Strategy was formulated during a period of almost complete stasis in house-building in Dublin and a forecast was made that the most likely outcome, in line with the RPG targets, was that development would come on stream later in the RPG cycle.</p> <p>While there may be some inconsistencies with the Core Strategy and the phasing plans outlined in specific Local Area Plans/SDZs in the County since the adoption of the Core Strategy, the simple reason is that no-one – not Dun Laoghaire Rathdown Council nor the DoECLG – has yet proven successful at forecasting the timeframe for recovery in the national housing market.</p> <p>An example of this is that a forecast was made in the Core Strategy that a limited amount of residential development (up to 300 units) was to have been delivered in Kiltiernan-Glenamuck during the period 2011 to 2013. This forecast has not turned out to be accurate – in fact, no development has been delivered in the area in this period. This demonstrates the practical difficulty in these very artificial circumstances, in seeking to compile a 'realistic' Core Strategy table required by the DoECLG. As an aside, the Manager would also note that, while not specifically relevant to Kiltiernan-Glenamuck, the continuing lack of certainty</p>

Key Issue	Sub. No.	Name	Manager's Response & Recommendation
			<p>surrounding the timing of projects listed on the DoECLG's Water Services Investment Programme for the County makes credible forecasting for delivery of development in many of the LAP/SDZ lands in the County completely impossible.</p> <p>The Manager is satisfied that the Kiltiernan Glenamuck Draft LAP is fully consistent with the Core Strategy in terms of quantum of development proposed. The area is serviced for water and drainage. In relation to roads infrastructure, a phasing sequence is set out in the Draft LAP (Section 10.6) which allows only a proportion of development to occur in advance of the construction of the new primary roads network. The Manager is satisfied that this phasing policy will ensure that development will proceed only if requisite infrastructure is in place. The precise timing of this development over the next 4-6-8 years is impossible to forecast with any accuracy at this juncture and a phasing plan as suggested by the DoECLG which places a precise number of units within these precise time-bands would not have any credibility.</p> <p>In relation to a building heights map, it is proposed to include such a map as part of the residential chapter. The map will outline the building heights as described in Chapter 11 of the Draft LAP "Planning Guidelines for the Development Land Parcels".</p> <p>Recommendation: Amend the Draft LAP as follows:</p> <p>Include a Map after page 35 entitled 'Building Heights', illustrating the building height provisions for each land parcel. The building height provisions for each land parcel are detailed in Chapter 11 of the Draft LAP "Planning Guidelines for the Development Land Parcels"</p> <p>This map is included as an appendix to the Managers Report.</p>
<p>2.2 The Authority has significant concerns with the Draft LAPs proposals for residential and employment development in the area and is unable to support the proposals in their current form.</p> <ul style="list-style-type: none"> While the Luas line serves the general area, much of the residentially zoned lands are outside a reasonable walking distance of the Ballyogan Luas Stop. It appears that private vehicles will therefore be the primary mode of transport in the area, reducing the potential for more sustainable 	D041	National Transport Authority	<p>The Manager, while welcoming the submission from the NTA has some serious concerns regarding its content.</p> <p>The NTA submission, somewhat disappointingly, fails to recognise the long genesis and the historic context underpinning the zoning of the Kiltiernan-Glenamuck lands and appears to address the Draft LAP as if it is somehow 'de novo'. The residential lands in Kiltiernan-Glenamuck were first proposed for rezoning over a decade ago. Prior to this and in the intervening years, there has been significant public investment in the area. Two major capital projects - the 'Kiltiernan-Glenamuck Mains Drainage Scheme' and the 'Sandyford High Level Water Supply Scheme' –were progressed at considerable expense, to service the lands for water and drainage. A Local Area Plan was adopted by the Council in 2007 to guide development in the area. Land has been acquired by the Council to facilitate objectives of the Local Area Plan, including the purchase of lands for a</p>

Key Issue	Sub. No.	Name	Manager's Response & Recommendation
<p>transport options.</p> <ul style="list-style-type: none"> Proposals for employment zoned lands could undermine the approach proposed in the Cherrywood SDZ. Also, a high car mode share would result, contrary to Smarter Travel objectives. NTA recommends that residential zoned lands be subject to a phased release – with the first phase being the lands within a 1km walking catchment of Luas. In respect to later phases, the local authority should collaborate with the NTA in preparing a public transport plan to service these areas. NTA requests that the amount of employment zoned lands should be reduced substantially. 			<p>public open space in the area.</p> <p>The Draft LAP lands are specifically included as one of a small number of 'Key Development Areas' in the Core Strategy which underpins the current County Development Plan. The lands feature as part of the strategic land bank for the Greater Dublin Area in the Regional Planning Guidelines 2010-2022. The Regional Authority has confirmed that the Core Strategy and the County Development Plan are fully consistent with the GDA Regional Planning Guidelines.</p> <p>Given the physical constraints in the County – the smallest in the State - the lands at Kiltiernan Glenamuck form a vital part of the, quite limited, residential land bank of Dun Laoghaire-Rathdown. Also, given the long-term postponement of the Luas extension to Fassaroe (which could potentially delay any substantive development at Old Conna) and the very long lead-in time for water and drainage servicing for the southern part of the County (which likewise could lead to significant delays in bringing forward substantive development at both Woodrook-Shanganagh and Old Conna) – the strategic importance of the Kiltiernan-Glenamuck lands are further elevated. It is also of significance that the Kiltiernan-Glenamuck lands are served by the newly upgraded Shanganagh Wastewater Treatment Plant, which has more than adequate capacity. The majority of the major development areas in the Dublin Area remain dependent on the Ringsend Wastewater Treatment Works, which has more limited capacity at present.</p> <p>This wider strategic County-wide perspective is crucial to any appraisal of the Kiltiernan-Glenamuck LAP lands and the Manager, while acknowledging the critically important issue of public transport accessibility for all new development areas and its role in ensuring that Smarter Travel targets are met, is firmly of the view that public transport accessibility is but one element <i>of many</i> in bringing forward large-scale LAP areas for development. It is understandable if the NTA given their exclusive transportation remit, have difficulty in appreciating this wider context.</p> <p>The submission states that much of the residential zoned lands are outside of the reasonable walking distance to the Ballyogan Wood Luas stop and will therefore <i>"continue to be served by the existing low frequency bus routes"</i>. The Manager is of the view that this approach appears at odds with the objectives of Smarter Travel to ensure that bus services are redesigned to provide for <i>"greater use of feeder buses to/from Luas/Metro/Rail stations"</i> (Smarter Travel (2009): Action 12). The NTA's 'Draft 2030 Vision' includes bus-related objectives to provide <i>"better public transport integration, by providing good interchange opportunities with other services, as the public transport network evolves."</i> The Strategy goes on to state that <i>"bus services will need to complement and support the investment in rail that will occur over the lifetime of the strategy. Integrating with the expanded rail network will lead to bus route changes and new routes"</i>.</p>

Key Issue	Sub. No.	Name	Manager's Response & Recommendation
			<p>The Manager would contend that the proposals advanced in the Draft Plan for an improved/upgrade bus service in the area to integrate with Luas, and routed centrally through the LAP lands along Glenamuck Road which includes priority measures such as a proposed bus-gate, are consistent both with Smarter Travel objectives and the NTA's own objective that <i>"no new home in an urban area is further than 800 metres walking distance from a bus or tram stop or rail station, with a shorter distance of 500 metres to be targeted wherever feasible"</i>.</p> <p>The NTA's statement in relation to employment zoned lands do not stand up to scrutiny. The employment-zoned lands in the Draft LAP are relatively modest in scale – 8 hectares in total - and have been zoned in successive County Development Plans for employment purposes going back over 20 years. The employment lands are the best located lands in the Plan area in terms of proximity to Luas (within a circa 600m catchment of the Ballyogan Wood Stop) and, indeed, are located closer to Luas than much of the undeveloped employment-zoned lands at Cherrywood. The NTA submission states that <i>"if a significant proportion of the employment lands were developed as proposed in the draft LAP, it is likely that a high car mode share would result"</i>. This assumption is advanced without any evidence. Employment zoned lands in Sandyford within a similar catchment to the Luas are achieving non-car modal shares of 40-45%.</p> <p>Dun Laoghaire-Rathdown has, in comparison to the other Dublin Authorities, an extremely small quantum of zoned employment land. Again, unlike the other Dublin authorities, almost all of it is within the Luas/DART catchments. The Manager has no intention of recommending the rezoning of employment lands in Kiltiernan Glenamuck. The zoning of land in Dun Laoghaire Rathdown is a matter for the County Council through the statutory County Development Plan process – not the NTA.</p> <p>A phasing proposal, as suggested by the NTA, which focuses exclusively on the 'medium/higher' residential density lands at the north-eastern portion of the Draft LAP does not take cognisance of the totality of the Plan or of the localised nuances of many of the individual sites in this area. The 'medium/higher' residential density lands only represent a small proportion of the overall residential land in the Draft LAP – less than 20% - and much of this land constitutes existing occupied detached dwellings. In the longer term, there may be some site assembly/aggregation that would generate larger development sites in this area, but in the present economic climate this is extremely unlikely in the short-term. A phasing scenario as envisaged by the NTA would therefore see only a fraction of the Draft LAP lands coming forward for development in the foreseeable future.</p> <p>It is also important to note that it is proposed to access certain land parcels in the medium/higher residential density zone from the proposed GDDR. The largest</p>

Key Issue	Sub. No.	Name	Manager's Response & Recommendation
			<p>single land parcel in this area 'Land Parcel 2' is proposed to be accessed via the proposed GDDR, yet is not envisaged that this road would be built until a certain critical mass of development in the area is delivered. Therefore a phasing sequence that saw only the medium/higher residential density developed would require the roads infrastructure to be delivered in advance of 80-90% of the development in the area – an untenable proposition.</p> <p>In summary, the Manager would contend that the NTA submission, in focussing exclusively on public transport accessibility characteristics of the Plan area, loses sight of the wider strategic context of the lands - of how critical the Kiltiernan-Glenamuck lands are in ensuring consistency with the Regional Planning Guidelines household targets and Core Strategy and of how rare the combination of both zoned <i>and</i> serviced residential land is in Dun Laoghaire-Rathdown.</p> <p>Recommendation: No change to Draft LAP.</p>

**Submission made by Regional Authority:
None**

PART 3

SUMMARY OF SUBMISSIONS AND MANAGER'S RESPONSE AND RECOMMENDATIONS

Key Issue	Sub. No.	Name	Manager's Response & Recommendation
3. Summary of Submissions on the Draft Kiltiernan Local Area Plan and Manager's Response			
<p>NATIONAL ROADS</p> <p>3.1. The submission highlights the strategic importance of the M50/M11 as National Routes, providing access to international markets for freight and advises that their use as distributor roads for development-driven traffic is inappropriate.</p> <ul style="list-style-type: none"> • From the period 2008-2011 traffic volumes on the M50 have increased 25% - placing pressure on capacity of the network • The NRA is not convinced that the Plan will not give rise to a high level of car dependency and adversely affect the efficiency of the national road network. • No detailed impact assessment has been made on the Carrickmines Interchange. • It is recommended that the transport assessment of the LAP be revisited to establish the impact on the national road network and that the Plan, in its current form, would be premature in advance of this study. 	D003	National Roads Authority	<p>The Manager, while welcoming the submission from the NRA, has some concerns regarding the content of the submission.</p> <p>The principal NRA concern is to protect the capacity of the M50/M11/N11 transport corridor. The submission is critical that the Transportation Consultant's study did not consider the traffic impact of the Draft LAP development on the existing Carrickmines Interchange. The NRA is proposing that the transportation study be revisited to assess the impact on the national road network.</p> <p>The Traffic Modelling carried out for the Draft LAP consisted of a cordoned model which included the M50/M11 from Ballinteer/Sandyford to Fassaroe and the N11 at Wyattville. Interchange. The modelling Core Scenario assumed 50% of the Cherrywood SDZ Development would have taken place by the time the Kiltiernan-Glenamuck LAP development is in place.</p> <p>The Traffic Study considers transportation mode choice and Smarter Travel objectives and these are set out in Section 3.4 of the Transportation Consultant's report. Thus the transportation modelling carried out is based on the achievement of realistic alternatives to car travel mode.</p> <p>The submission makes reference to the period 2008-2011 as a period of significant traffic growth on the M50. The NRA's own traffic counter at Fassaroe, south of the Draft LAP area, however, shows an overall decline of 7% in traffic levels since 2008, averaging c.2% per annum. It is difficult to reconcile these two conflicting sets of data.</p> <p>In broad terms, the NRA's position is to protect the 'primary' function of the M50 and, as far as possible, to discourage short-hop commuter-based trips from undermining the efficiency of the motorway. A core objective in this regard has been the development of alternative 'parallel' roads to the M50 which facilitate local trips. There has been significant improvements in recent years in the 'parallel' routes to the M50 in the Kiltiernan-Glenamuck environs facilitating good road-based alternatives for trips to Sandyford in particular. The upgrade of the Ballyogan Road Improvement was completed in the last few years. This is a parallel local road to the M50 between Carrickmines and Murphystown Road and the Leopardstown Interchange which provides convenient accessibility to the</p>

Key Issue	Sub. No.	Name	Manager's Response & Recommendation
			<p>Sandyford Business Estates.</p> <p>This demonstrates that there is now a good quality parallel road link between Carrickmines Interchange and Leopardstown Interchange. The Burton Hall Extension is currently under construction, which will allow more efficient access to the Sandyford Business Park. Together with the future ESB Link and Leopardstown Link Road and signalisation at the Leopardstown roundabout, these roads will provide a good and effective local road network alternative to the M50 in the environs of the LAP between Carrickmines Interchange and Leopardstown/Sandyford. The road improvements in the Draft LAP area and the Cherrywood SDZ together with the planned local link road across the M50 will likewise provide a good local road connection between Kiltiernan-Glenamuck and Cherrywood/Lehaunstown. The remaining proposed roads will provide a local road (parallel to the M50) link to Wilford and Fassaroe.</p> <p>Accordingly the Manager contends that these proposed local link roads will provide high quality alternative road links for traffic to travel parallel to and to cross the M50 without causing any further congestion to the M50 in this area. This will facilitate the now longer-term development of the Kiltiernan/Glenamuck Draft LAP lands.</p> <p>In broader terms, the Manager has some concerns regarding the NRA's conception of the strategic role of the M50 and the road's actual function in the real world. The M50 was originally conceived as an orbital route to carry longer distance strategic traffic around and away from the city centre. However, in addition to its strategic function, and as a result of the growth in development along the corridor, the existing M50 now appears to perform a more local function connecting residential and commercial centres on and adjacent to the corridor with the overwhelming proportion of traffic on the route undertaking non-strategic trips. This 'dual function' now appears to be a reality in the context of the gradual expansion of the urbanized metropolitan area over the last 20 years.</p> <p>It is the view of the Manager that the NRA consistently fails to take cognisance of the long-standing existing zonings in the County, much of which were considered in the design of the SEM (M50/M11) in terms of traffic impact. The approach of the NRA to now seek restrictions on such development and/or access to the M50/M11 in part contradicts the position which was presented in the public hearing for that scheme. The NRA comments in this respect are, in part, also in conflict with other government agency policies such as the National Spatial Strategy and the Regional Planning Guidelines which acknowledges the strategic importance of the Kiltiernan-Glenamuck lands.</p> <p>Recommendation: No change to Draft LAP.</p>

<p>ENVIRONMENTAL ISSUES</p> <p>3.2 Following adoption of the LAP, an SEA Statement should be prepared setting out how environmental considerations have been taken into account during the making of the LAP.</p> <ul style="list-style-type: none"> • Some advice is given on strengthening references to the Water Framework Directive in relation to policy • There would be merit in including an objective relating to the integration of the Eastern River Basin Management Plan and the LAP • There would be merit in considering any unfinished housing estates in the LAP boundary. • Consideration should be given to protecting ecological linkages when providing open space in the LAP. • There would be merit in considering the establishment of a Green Infrastructure Strategy for the Plan area. <p>In relation to the SEA Environmental Report:</p> <ul style="list-style-type: none"> • There would be merit in providing a summary of development alternatives in the non-technical summary • There would be merit in summarising whether any cumulative environmental effects have been identified. • Clarification should be given on whether the different phases of development are all proposed within the lifetime of the LAP • Consideration should be given to taking account of different commuting patterns on the Objective relating to Climate Change 	D005	Environmental Protection Agency	<p>An SEA Statement will accompany the finished LAP, setting out how environmental considerations have been taken into account during the making of the LAP. The Manager recommends amending a number of policies and objectives to strengthen environmental protection in line with the submission from the EPA.</p> <p>In relation to the proposal to consider the issue of unfinished housing estates within the Draft LAP, it should be noted that there are no unfinished housing estates within the Draft LAP boundary.</p> <p>In relation to considering the establishment of a Green Infrastructure Strategy for the Draft LAP area, it should be noted that the Planning Department are in the early stages, in conjunction with the Parks Department of formulating a Green Infrastructure Strategy for the County, to be incorporated as part of the next County Development Plan review.</p> <p>Amendments to the SEA Environmental Report (in the form of an Addendum) will be made in accordance with the submission.</p> <p>Recommendation:</p> <p>Amend Policy Objective V07 (P.13) to read: (new text in bold)</p> <p>The EU Directives for Environmental Impact Assessment (EIA), the Water Framework Directive, the Floods Directive and the and Strategic Environmental Assessment (SEA) are the fundamental policy framework of environmental protection measures and legislation for the delivery of the policies within this document and full compliance with the EIA and SEA Directives shall be provided.</p> <p>Amend Objective LHC1 (P.17) as follows:</p> <p>To ensure that planning applications have regard to take into account any existing groundwater protection schemes and groundwater source protection zones and/or the likely impacts that the development may have on groundwater.</p> <p>Amend Objective LHC2 (P.17) as follows:</p> <p>To ensure the implementation of the EU Water Framework Directive, the EU Groundwater Directive and the protection of the groundwater resources in and around the Draft LAP and associated habitats and species.</p> <p>Amend Section 3.1.5 (P.19 Paragraph 6) as follows:</p> <p>Notwithstanding, any recommendations of the Eastern Catchment Flood Risk Assessment and Management (CFRAM) Study and the Flood Risk Management Plan, when published, will be implemented in full along with the requirements</p>
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			<p>of the Eastern River Basin Management Plan and associated Programme of Measures.</p> <p>Amend Objective OS03 (P.48) as follows:</p> <p>To acknowledge and respect areas of ecological importance, local topography, watercourses, hedgerows, woodlands, mature trees and views when providing open space and to ensure the protection of ecological linkages when providing open space within the Plan area.</p>
3.3 No further comment to make on Draft LAP	D006	Environmental Health Service	Submission is noted.
<p>AQUATIC ENVIRONMENT</p> <p>3.4 Inland Fisheries Ireland note and welcome the provisions made for the protection of the aquatic environment in the Draft LAP.</p>	D018	Dept. Of Communications, Energy and Natural Resources	<p>Submission is noted.</p> <p>Recommendation: No change to Draft LAP.</p>
<p>LIGHT RAIL</p> <p>3.5 RPA welcomes the overall strategy to have a graduation of densities from higher densities adjacent to the Luas line. It is important that good pedestrian and cycle links are provided through the plan area to the Luas.</p> <ul style="list-style-type: none"> RPA support the objective of facilitating appropriate frequencies and routings of bus services to serve the Luas station at Ballyogan Wood. Recommend a minor textual correction in relation to a reference in the Draft LAP to the 'proposed' Luas stop at Ballyogan Wood. 	D033	Railway Procurement Agency	<p>Submission is noted</p> <p>Recommendation: Amend Objective MT01 (P.36) To read:</p> <p>To reduce the need for travel by private car within the LAP by:</p> <ul style="list-style-type: none"> facilitating appropriate frequencies and routings of bus services to address increased population levels, including good linkages to proposed LUAS Line B1 station at Ballyogan Wood Luas stop on the Luas Green Line.
<p>OVERHEAD POWERLINES</p> <p>3.6 Submission relates to the Objective in the LAP to facilitate the undergrounding of the 220kv transmission lines. While Eirgrid appreciate that the undergrounding of transmission lines in a built-up area is feasible, the "optimum" means of transportation of electricity is via overhead lines – due to requirements of maintenance and repair.</p> <ul style="list-style-type: none"> Eirgrid policy maintains that an underground line will only be used if 	D045	Eirgrid	<p>The policy and criteria of Eirgrid in relation to the undergrounding of power lines are noted. The Manager have been liaising with Eirgrid/ESB Networks in recent years in relation to the undergrounding of the 220kv overhead powerline that traverses the Plan area and commissioned a feasibility study in 2010 to examine the issue in detail.</p> <p>The Manager notes that it is the preference of Eirgrid to maintain overhead lines of this nature on the basis of ease of maintenance and repair. The wider context of ensuring the highest quality of development of the Kiltiernan-Glenamuck lands, a key strategic landbank within the Greater Dublin Area is also important – and it is the view of the Manager that the optimal development of the lands are not</p>

<p>all of the following conditions apply:</p> <ul style="list-style-type: none"> o Overhead line is not environmentally feasible o Technically and environmentally acceptable underground route can be found o Relative 'availability' of the underground cable o Cost factors 			<p>consistent with the retention of the powerlines in the current overhead format.</p> <p>To this end, the Manager is continuing to work with Eirgrid and ESB Networks to find a mutually acceptable solution to the issue and will continue to press for the undergrounding of the 220kv powerlines, subject to meeting the technical and environmental requirements of Eirgrid.</p> <p>Recommendation: No Change to Draft LAP.</p>
<p>GLDR</p> <p>3.7 While there is general support expressed in many submissions for the main proposed distributor road in the Draft Plan (the Glenamuck District Distributor Road GDDR), several submissions call for the removal of the proposed Glenamuck Link Distributor Road from the Draft LAP:</p> <ul style="list-style-type: none"> • The GLDR would create a severance of residents from Kiltiernan Village • The GLDR is 'development driven' and is proposed only to facilitate developers 	<p>D010, D011, D023, D024, D025, D031, D036, D038, D042</p>	<p>Chand Kohli Debbie Anderson, Kiersey Family, Gay Wright, Bernie Dwyer, Colman Curran, Kiltiernan Residents Association, Niall Carroll, Hugh O'Sullivan</p>	<p>The Glenamuck Link Distributor Road (GLDR) is an integral part of the proposed Draft LAP and fundamental to one of the principle objectives of the Plan – the establishment of a pedestrian friendly, lightly trafficked village core for Kiltiernan. The GLDR provides an effective by-pass of the village by removing any extraneous traffic movements along the Enniskerry Road. The benefits from this proposed by-pass will be significant in terms of creating a village centre which successfully promotes the other functions of streets - not just as vehicle transport routes - including providing a 'sense of place', facilitating social interaction and encouraging walking and cycling. The overall phasing of development in the LAP will determine when the various transport provisions will become essential. At some point, the GLDR will become necessary to distribute LAP-generated traffic and to divert Enniskerry Road traffic away from the developing Kiltiernan Village.</p> <p>Recommendation: No change to Draft LAP</p>
<p>EXTENSION of GLDR</p> <p>3.8 Several submissions called for the removal of the 'extension' of the Link Distributor Road from the Ballycorus Road to the Enniskerry Road. This section of road was removed from the LAP in 2007 but reinstated as part of the County Development Plan process in 2010. Arguments advanced for its removal include:</p> <ul style="list-style-type: none"> • This section of road is unnecessary given the overall decline in traffic numbers since the opening of the M50 	<p>D008, D023, D038</p>	<p>Sonia Buckley, Kiersey Family, Niall Carroll</p>	<p>The proposed route for the GDLR ensures that the most advantageous route to travel from Stepside/Carrickmines to and from Enniskerry - as a de-facto bypass of Kiltiernan Village - will be to use the new road network. Without the GLDR extension at Ballycorus Road, the available route through the village would be as attractive as the new road network and so the bypass would be less successful. Thus, with the 'GLDR Extension' the proposed network is considered the most efficient and effective Bypass route providing linkages to both the Carrickmines/Cherrywood area, continuing the Enniskerry Road connection towards Stepside/Lambs Cross avoiding potential traffic congestion at the existing Enniskerry Road/Ballycorus Road junction. Allied to associated future traffic management measures in the Village area, the GLDR as proposed will best support and facilitate the development of the pedestrian-friendly Village Core free from through traffic.</p> <p>The inclusion of the section of GLDR between Enniskerry Road and Ballycorus Road will greatly improve the residential amenity of those properties fronting the</p>

			<p>Enniskerry Road in the southern part of the Village.</p> <p>A road proposal as extensive as the one proposed in the Draft LAP will have to be assessed independently by An Bord Pleanála. As part of any assessment, a full Environmental Impact Study will be prepared for presentation to the Bord of the road proposals outlining the alternative routes considered. Such a Study will provide for an updated traffic flow analysis to support the proposed route. While existing traffic flows remain low - benefiting from the diversion of flow from Enniskerry/Wicklow onto the M11 - the future development at Kiltiernan-Glenamuck/Carrickmines together with a redistribution of traffic from the South Eastern Motorway as it becomes increasingly trafficked in future years will require the introduction of road infrastructure on the scale presently proposed in the Draft Local Area Plan.</p> <p>Recommendation: No change to Draft LAP</p>
<p>BUS GATE</p> <p>3.9 A significant number of the submissions from the public focussed on the issue of the proposed 'bus-gate' at the junction of the Glenamuck Road and the proposed Glenamuck Link Distributor Road (GLDR). The majority of these submissions were critical of this proposal on the following grounds:</p> <ul style="list-style-type: none"> The bus gate would 'sever' the residents of the Glenamuck Road from Kiltiernan Village, requiring a much longer, circuitous route for car-users seeking to access the Village. <p>Most submissions on this issue called for the proposal to be dropped from the Draft LAP. Other submissions suggested a 'flyover/underpass' arrangement between the Glenamuck Road and the proposed GLDR to allow for a free flow of traffic along Glenamuck Road to Kiltiernan</p> <p>A small number of submissions suggested reinstating the proposal to cul-de-sac the Glenamuck Road at the northern end, as per the 2007 LAP.</p>	<p>D011, D012, D017, D019, D020, D024, D025, D026, D027, D028, D029, D030 D036,</p> <p>D037, D039, D040, D042, D044, D052, D053, D056, D057, D058, D059</p>	<p>Debbie Anderson, Yvonne Callaghan, Barbara Dwyer, Brian Farrelly, Cllr. T. Murphy, Gay Wright Bernie Dwyer, Niamh Scully, Jan Coll, Susan McNeely, Jonathon Huet, Philip Thompson Kiltiernan Residents Assoc., Morrrough Kavanagh, Aileen Eglinton, Lisa O'Sullivan, Hugh O'Sullivan, James Grimes, Sally-Ann Mitchell, Deirdre Carroll, Mona Stafford, Signature Unclear, BH Pierce, Shane Ross T.D.</p>	<p>The proposals for a 'bus-gate' at the proposed junction between the Glenamuck Road and the proposed GLDR have been made for a number of reasons:</p> <p>In order to achieve a good 'modal share' for public transport use in the Plan area, appropriate priority measures for bus users are necessary. Connectivity with the Luas Green Line offers a high quality public transport option linking with major employment centres such as Sandyford and Cherrywood as well as the City Centre. In order to achieve a high quality bus feeder service to the Luas Stop at Ballyogan Wood, a level of priority in the local road network for bus users is required. This bus priority can take various forms, such as dedicated bus lanes, bus priority at junctions and bus gates.</p> <p>The proposal for a 'bus-gate' at this specific location was promoted for a number of reasons. The restriction on traffic accessing the north-eastern section of the Glenamuck Road from the proposed GLDR will introduce a significant level of 'traffic-calming' to this section of road, improving conditions for both residents and for pedestrians and cyclists using the road. Furthermore, lower traffic volumes on this section of road mean that it is unnecessary to propose any significant carriageway widening/upgrading that may adversely affect the attractive, sylvan nature of the road.</p> <p>The restriction will prevent this section of Glenamuck Road being used as a 'rat-run' for traffic originating south of the Plan area destined for the Carrickmines area/M50. Traffic will be required to proceed to the GDDR in order to make a movement to the north-east of the Plan area.</p> <p>The concept of the provision of a bus gate in this location is a long term proposal in the context of the development of the Draft LAP lands. It is considered to be a critical traffic management provision necessary when the lands have developed</p>

			<p>significantly in terms of critical mass and the demand for public transport has risen well above current levels. When it becomes necessary, the development of the area will mean that Kiltiernan-Glenamuck will be quite different from what it is today. The final designs for the bus gate provision will be considered in the future context and the decisions in relation to its actual configuration will be based on future scenarios.</p> <p>The detailed operation and function of the bus-gate will be determined at detailed design stage for the proposed road, but a major part of the examination will be whether the bus-gate should operate at 'rush hour' only – as is the case with the established bus-gate at College Green in the City Centre, for example. A peak-time only bus gate would create a far lower level of disruption, overall, for residents of Glenamuck Road seeking to drive toward Kiltiernan Village. It is recommended that the Draft LAP be amended to clarify that the bus-gates may be required to operate only at peak-hours, with little or no restrictions in place outside of these hours.</p> <p>The proposals advanced in a number of submissions for a flyover/underpass solution at the junction of Glenamuck Road/proposed GLDR are not considered to be desirable on a number of grounds. The transportation needs for the LAP includes for the existing Glenamuck Road to function as collector roads. Thus the connections to the GLDR and other parts of the network are important in the distribution of traffic. Any proposal to include for a bridge would need to consider this requirement which would complicate the proposed road layouts. Technically the existing topography in the area does not lend itself readily to the provision of grade separation and such provision would likely result in roads being elevated to circa 6m or so above existing ground levels. This would result in significant visual intrusion that would be detrimental to the visual amenity of the area.</p> <p>Recommendation: Amend Draft LAP as follows:</p> <p>Section 5.3.1 Primary Road Network (P.39 End para. 3) add the following:</p> <p>The Council will develop proposals for the operation of the 'bus-gates' at the detailed design stage for the proposed new road network. The Council will consider whether the bus-gates should operate at 'peak-times' only, with little or no restrictions at other times of the day.</p>
<p>CUL-DE-SACING OF GLENAMUCK ROAD 3.10 Submissions in favour of proposal in Draft LAP to no longer seek the cul-de-sacing of Glenamuck Road (East) at the junction with the roundabout in Carrickmines.</p>	D034, D048, D049, D054	Paul O'Leary John O'Leary, Dervla O'Leary, Eddie McWilliams	<p>Submissions are noted. Recommendation: No change to Draft LAP</p>
<p>CYCLING INFRASTRUCTURE 3.11 Submission in favour of constructing the bypass of Kiltiernan Village. Also recommends</p>	D002	Rationalist Era	<p>The 'National Cycle Manual', published by the National Transport Authority is the official guidance document for cycle infrastructure planning in the State and the</p>

<p>adhering to 'Dutch practice' rather than following National Cycle Manual in planning for cyclists.</p>			<p>Planning Authority is required to have regard to its provisions. On a point of information, the Manual was informed in a significant way by the long experience in the Netherlands of planning for cycle infrastructure and the document was reviewed by an Expert Group that included Dutch engineers.</p> <p>To quote from the National Cycle Manual: <i>"Cycling is a vulnerable mode in traffic terms. Safety is at the heart of all good design. The designer should ensure that the Principles of Sustainable Safety have been applied to all schemes. The principles of Sustainable Safety were developed in the Netherlands in 1992 and the following years. They underpin all road design and the adherence to those principles has contributed to the Netherlands leading record in road safety. This Manual subscribes to the principles of Sustainable Safety and has used them in the determination of content."</i> P.3</p> <p>Recommendation: No change to Draft LAP</p>
<p>CYCLING 3.12 Several submissions called for improved facilities for cyclists in the area, given the high number of recreational cyclists who pass through Kiltiernan en route to Wicklow.</p>	D012, D038	Mark Byrne, Niall Carroll	<p>The submission is noted. Integral to the design of the new road layout for the GDDR/GLDR are proposals for cycle tracks for the full length of both roads. Cycle tracks will be 2m in width, in each direction. Furthermore, the traffic-calming effect of the bypass of Kiltiernan Village will provide for a much-enhanced cycling environment along the Enniskerry Road through the Village. Cycle traffic would not be affected by the proposed bus-gate at the Enniskerry Road.</p> <p>Recommendation: No change to Draft LAP</p>
<p>PARKING 3.13 Increased surface-level car-parking provision should be made at proposed neighbourhood centres</p> <p>Granite sub-strate in the area makes any proposed underground car-parking environmentally unsound.</p>	D023, D028, D036 D039	Kiersey Family, Susan McNeely, Kiltiernan Residents Assoc., Aileen Eglington	<p>Detailed design of parking provision for the Neighbourhood Centre lands is beyond the scope of a Draft LAP and more suited to assessment at planning application stage. The Draft LAP offers a level of flexibility in the provision of car parking at commercial/retail locations in the Plan (Section 5.3.4), stating that <i>"while there is a preference for underground car-parking, if this is not feasible (either on economic or technical grounds) surface level car parking may be proposed, subject to it not detracting from the urban realm."</i></p> <p>In relation to parking standards, the provisions already set out in the County Development Plan will apply.</p> <p>Recommendation: No change to Draft LAP</p>
<p>PHASING 3.14 Several submissions raised the issue of the proposed phasing of development. Some submissions questioned whether the proposals for allowing up to 1000 residential units to</p>	D051 D041, D042,	DoECLG NTA, Hugh O'Sullivan	<p>In relation to phasing, the Draft LAP states (Section 10.6, Page 56) that up to 1,000 dwelling units could be developed on an upgraded existing road network. This equates to approximately one third of the overall proposed number of dwellings. This estimate was made as part of the phasing/sequencing analysis</p>

<p>proceed in advance of the construction of the proposed roads infrastructure was premature. Other submissions suggested altering the phasing sequence to prioritise the lands closest to the Luas line over all other residential lands.</p>			<p>carried out for the original Section 49 Levy study.</p> <p>Given the reduction in residential densities proposed in the Draft LAP, and the lower overall residential unit numbers likely to be generated on these lands, it is considered appropriate to give consideration to lowering the numbers associated with the first phase of development. To this end, following an analysis, the Manager recommends that the quantum of residential development permitted in Phase 1 (in advance of delivery of the major new roads infrastructure in the area) should be reduced from 1000 units to 700 units overall. The three separate areas identified in Section 10.6 of the Draft Plan should have their allocation reduced as follows:</p> <p>PHASE A. GLENAMUCK ROAD UPPER/NORTH PORTION – Reduced from 300 to 200 dwelling units.</p> <p>PHASE B. NODE AT JUNCTION OF ENNISKERRY AND GLENAMUCK ROADS – Reduced from 200 to 150 dwelling units</p> <p>PHASE C. CONCENTRATED AT VILLAGE CORE / ALONG ENNISKERRY ROAD – reduced from 500 to 350 dwelling units.</p> <p>Recommendation: Amend the Draft LAP as follows: Amend Section 10.6 ‘Interim Proposal to Accommodate Development’</p> <p>P. 56 left column, final paragraph Dun Laoghaire-Rathdown’s Transportation Department considers that up to 1,000 700 dwelling units could be accommodated on an upgraded existing road network (Phase 1). The development of units additional units in excess of these 1,000 700 dwelling units would, however, require the construction</p> <p>P. 56 right column, second paragraph Outlined below are the recommended planning criteria to be used in the assessment of planning applications for development of up to 1,000 700 dwelling units (Phase 1).</p> <p>P.57, left column PHASE 1 (a) to comprise c. 500 350 dwelling units: A. GLENAMUCK ROAD UPPER/NORTH PORTION (c. 300 200 dwelling units) This area encompasses the lands designated as ‘mediumhigher density residential’ at the northern section of Glenamuck Road.</p> <p>B. NODE AT JUNCTION OF ENNISKERRY AND GLENAMUCK ROADS (c. 200 150 dwelling units) This area includes the lands designated as ‘medium density residential’ to the east of the Enniskerry Road. Any proposed developments must include the improvement of Glenamuck Road.</p>
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			<p>PHASE 1 (b) to comprise c. 500 350 dwelling units: C. CONCENTRATED AT VILLAGE CORE / ALONG ENNISKERRY ROAD These lands include the lands zoned as 'Neighbourhood Centre' and 'Residential' along the Enniskerry Road. Development is dependent on the delivery of the Traffic Calming Scheme and must include the improvement of the Enniskerry Road through the 'Village Core.'</p>
<p>TRANSPORT ISSUES</p> <p>3.15 Road layouts are not in accordance with Design Manual for Urban Roads and Streets – they are designed as highly segregated distributor roads and will encourage high vehicle speeds and create severance.</p> <p>Traffic modelling report – demand inputs for the model do not include residential units in parcels 5A, 5B and 5C.</p> <p>Proposed phasing – to allow a first phase of residential development at the 'medium/higher residential density' parcels would place an intolerable level of traffic on local roads.</p>	D042	Hugh O'Sullivan	<p>This submission contains a number of predominantly transportation-related issues:</p> <p>In relation to the road layout design and consistency with the Design Manual for Urban roads and Streets – at this stage of the design the proposed routes are at concept stage and the layouts are developed to a level which identifies the extents of lands required to be allocated for their construction. The GDDR and GLDR are designated the status of Distributor Roads for the lands in the LAP and as such, a high quality design is necessary to serve the development in its proposed suburban location. The detailing of the road design will follow at later development stages but it is anticipated that the overall Plan area will evolve over time as an 'Urban' area when the various developments have progressed significantly. At this future stage the area will be operationally and functionally similar to many other urban areas in the Dublin Region, where such areas are served by similar Distributor Roads. Access to the Distributor Road network will be at designated locations only and an 'urban' traffic light controlled, 50kph speed limit environment is envisaged. The concepts within the DMRB are not the overriding concepts determining the design of the proposed Distributor Roads.</p> <p>Other access roads/streets to be provided within development lands and indeed the existing roads of Glenamuck Road and Enniskerry Road at Kiltiernan would be the roads and streets to be considered as appropriate for the application of the recently published Design Manual for Urban Roads and Streets.</p> <p>In relation to the specific issues raised in relation to the Traffic Modelling Report – the submission states that <i>"the demand inputs for the traffic model does not allow for any residential units in the land parcels 5A, 5B and 5C, which are anticipated to contain up to 270 residential units"</i>. However, the screen grab of the model input spread sheet that is contained in the report is for the 'Do Minimum Scenario', which contained development quanta as per the original 2006 LAP model i.e. parcels 5A, 5B and 5C are zoned for commercial use. The 'Do Something' model input spread sheet contains up-to-date proposed land uses that reflect the current LAP proposals, where the aforementioned parcels are zoned as residential.</p> <p>The submission further states that <i>"the development of parcels 2, 31a and 31b will result in 650 additional residential units accessing onto the Glenamuck Road. Using the traffic forecasting provided in the Traffic Modelling Report this would amount to at least 200 extra vehicles in the AM peak hour in addition to the current levels on the Glenamuck Road..."</i></p>

			<p>However, as noted previously, it is intended (and indeed modelled that way) that Land Parcel 2 will be accessed via a junction on to the proposed GDDR – not the Glenamuck Road. This parcel will generate approximately 300 of the 650 units referred to in the submission. While the additional 350 residential units proposed for land parcels 31a and 31b are planned to be accessible from Glenamuck Road, the impact of the additional development traffic will be less than that quoted in the submission.</p> <p>In relation to phasing, see the previous section of the report, Section 3.14.</p> <p>Recommendation: No change to Draft LAP</p>
<p>QBC 3.16 The County Development Plan includes an Objective for a QBC along the Enniskerry Road/GDDR. The Draft LAP proposes a 'Primary Bus Route' along the existing Glenamuck Road/Enniskerry Road. This approach means that the Draft LAP is not consistent with the County Plan and should be reconsidered.</p>	D046	John Spain Associates	<p>It is acknowledged that there is a difference in the proposed routing of the bus priority lane through the LAP lands between the Draft LAP and the County Development Plan 2010. The transportation proposals, as reviewed, now involve providing bus priority from Enniskerry Road to Carrickmines along Glenamuck Road. It is appropriate that the Manager, at Local Area Plan stage, is in a position to assess, in light of detailed site specific traffic modelling, whether proposed QBC routes, as outlined in the County Plan, can be improved upon. Irrespective of the revised alignment/routing, the 'origin-destination' of the corridor as it relates to the Plan area remains unchanged. The routes as described in the County Development Plan are for general guidance. Indeed, many QBC routes are described in schematic fashion, for instance, two routes in the County Plan are 'Sandyford Business Park' and 'Cherrywood Area', with no specifics given with regard to routing.</p> <p>The County Plan contains a statement that it is an objective of the Council to "extend the bus network to other areas where appropriate subject to design, public consultation, approval, finance and resources. Other links will also be included in the Quality Bus network as part of new developments." P.114.</p> <p>Recommendation: No change to Draft LAP</p>
<p>TRAFFIC ISSUES 3.17 Submission addresses a number of issues:</p> <ul style="list-style-type: none"> Roads – delays in the road network are "caused by junctions". Signalised junctions have a detrimental affect on journey times – the Council should consider the use of roundabouts. Also, buffer spaces should be provided at verges to improve cycling/walking 	D060	Dermot Haughey	<p>This submission welcomes the proposed bypass of Kiltarnan.</p> <p>The submission criticises the existing traffic light controlled junction at Glenamuck Road / Enniskerry Road. The Traffic Modelling report does not state that the future junction between Enniskerry Road and Glenamuck Road will operate above capacity but it does include for future improvements at this junction to improve facilities for pedestrians/cyclists and optimised traffic light sequencing. A 'LinSig' traffic signal modelling exercise showed that the junction is predicted to operate well below practical capacity, with minimal queuing, as and when the Draft LAP developments and planned road infrastructure are in place.</p>

<p>facilities.</p> <ul style="list-style-type: none"> Schools – provision should be made for 1-2 more primary schools and a senior school. Playgrounds – provision should be made for public play spaces, not just within developments. 			<p>In general terms, roundabouts were not recommended as part of the Study as they do not provide high quality facilities for cyclists and pedestrians. It is a transportation objective of the Draft LAP to positively promote alternative transport modes to the private car.</p> <p>Studies have demonstrated that, for highly trafficked junctions, traffic light control usually provides for less delay. At low traffic volumes, roundabouts can cause less delay but as noted above, do not provide for a friendly pedestrian/cyclist environment.</p> <p>In relation to school provision, the Manager have been liaising with the Department of Education and Skills, in accordance with the <i>“Code of Practice on the Provision of Schools and the Planning System”</i> regarding future school requirements in the Draft LAP area and environs. The requirements of the Department have been integrated into the Draft LAP.</p> <p>The submission makes reference to play spaces – the Draft LAP makes provision for a centrally located public open space/park within the Plan area. Also, provision is made for a central public open space within the primary Neighbourhood Centre site. In addition, the future Jamestown Park will provide for play areas and other recreational facilities.</p> <p>Recommendation:</p> <p>No change to Draft LAP</p>
<p>TRAFFIC ISSUES</p> <p>3.18 Submission offers a critique of the Traffic Modelling Report provided as a background document to the Draft LAP.</p>	D01	John Findlater	<p>This submission is critical of the level of new road provision set out in the Draft LAP. The submission repeatedly quotes existing low traffic flows as the basis for the argument that new roads / upgraded junctions are not required. However, these numbers do not take account of the predicted increase in traffic levels due to the development of the Draft LAP lands.</p> <p>The submission claims that <i>“Such enhancements to the capacity of the infrastructure (as outlined in the traffic modelling report) are not likely to be required for a significantly long period of time and their implementation at the early stages of the development of the area would not be necessary to cater for the early stage traffic demands. However, they (DLRCC) are proposing lots of new roads throughout the LAP to enable access to the zoned lands.”</i></p> <p>Despite the submissions’ concerns, the proposed road network will not be built in full at the outset of the development; rather, it will be implemented on a phased basis, as set out in Section 10.6 of the Draft LAP, as proposed to be amended. The further development of the proposed road network may well continue to be phased as is necessary to facilitate the planned developments as they come on stream.</p> <p>The submission refers to the proposed new road infrastructure as a ‘bypass’. It</p>

			<p>highlights the small nature of Kiltiernan Village and argues that, as such, it does not warrant such a bypass. However, the purpose of the new road infrastructure is not only to bypass the existing village, rather, to cater for additional traffic that will be generated by the development of the LAP lands as a whole.</p> <p>Recommendation:</p> <p>No change to Draft LAP</p>
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<p>ATTENUATION PONDS</p> <p>3.19 Submission objects to attenuation pond B1. It is unnecessary, as there is no need for a new road. Alternative locations are proposed for it.</p>	D008	Sonia Buckley	<p>Attenuation Pond B1 is proposed to be located at a point south of Ballycorus Road. The catchment for the pond extends to a large area north of Ballycorus Road and west of Enniskerry Road. The engineering assessment carried out for the specification of the attenuation ponds identified a requirement for a pond of this scale at this location based on a requirement to provide 100% attenuation for the proposed new road network and also regional attenuation for development lands, to safeguard against the failure of a development's on-site SUDS mechanism. The Manager is satisfied that the attenuation pond proposed in this location is required as specified.</p> <p>Recommendation:</p> <p>No change to Draft LAP</p>
<p>DENSITY</p> <p>3.20 Some submissions argued, in general terms, that proposed residential densities in the Draft LAP area are too high and that apartment provision in the area would be inappropriate. Some submissions also called for a maximum building height of 2 storeys.</p>	D011, D024, D036 D037, D040, D060	Debbie Anderson, Gay Wright, Kiltiernan Residents Association, Morrough Kavanagh, Lisa O'Sullivan, Dermot Haughey	<p>The residential densities proposed in the Draft LAP are consistent with the Government guidance document '<i>Sustainable Residential Development in Urban Areas (2008)</i>'. The density ranges proposed are 35-40dph, 40-45dph and 45-55uph, with only a minority of the residential lands designated with the higher density band. It is considered that these residential densities, in comparison with densities applied in other SDZ/LAPs in the County and in other comparable locations in suburban Dublin are relatively moderate and reflective of the location of the lands at the 'peri-urban' edge of the Metropolitan area.</p> <p>Recommendation:</p> <p>No change to Draft LAP</p>
<p>S49 LEVY</p> <p>3.21 Several submissions raised the issue of the Section 49 Supplementary Development Contribution Scheme in place for the area. Some submissions called for the levy on one-off family homes to be dropped or for the conditions associated with the application of the levy to be changed to make it easier for</p>	D016, D020, D023, D024, D025, D030, D036,	Barbara Dwyer, Cllr. T. Murphy, Kiersey Family, Gay Wright, Bernie Dwyer, Philip Thompson, Kiltiernan Residents Association	<p>The Draft LAP includes an objective to review the provisions of the Section 49 levy, following the adoption of the Plan. It is accepted by the Manager that the current levy figure for residential development, based on 2008 land values, represents a major impediment to bringing forward lands for development, including small-scale, one-off developments.</p> <p>The review of the Section 49 Supplementary Development Contribution Scheme will be the appropriate vehicle for revisiting the provisions of the Scheme,</p>

family members to build on family land.	D037, D039, D044	Morrrough Kavanagh, Aileen Eglington, James Grimes	including any criteria for exempting contributions. Recommendation: No change to Draft LAP
TRAVELLERS ACCOMMODATION 3.22 Several submissions raised the issue of Travellers Accommodation – specifically the site presently occupied on the Glenamuck Road. Objections were voiced on the basis that the scheme has 'brought crime to the area'.	D017	Barbara Dwyer	The Manager is committed to the objective for a Travellers Accommodation Site on the Glenamuck Road, in accordance with the Council's Travellers Accommodation Programme which is currently being reviewed. Recommendation: No change to Draft LAP
LAND PARCEL 29B 3.23 Several submissions raised the issue of the decommissioned communal septic tank site in Glenamuck Cottages (identified on the Draft LAP map as Site 29B). Some residents in the estate have voiced a preference for this residential-zoned land to be rezoned to 'Open Space' and protected as a play area/open space for the local community.	D019 D025, D028, D036, D040, D052, D056, D058	Brian Farrelly, Bernie Dwyer, Susan McNeely, Kiltarnan Residents Association, Lisa/Hugh O'Sullivan, Sally-Ann Mitchell, Mona Stafford, BH Pierce	The subject site is in Council ownership, is zoned Objective 'A' (residential) and is serviced for development. Having regard to the substantial social and affordable housing need identified in the County, as outlined in the Housing Strategy and the obvious suitability of the site for a small-scale sensitive infill residential scheme, it is considered that the site is of strategic value to the Council and should remain zoned Objective 'A' (residential). Recommendation: No change to Draft LAP
PLAYING PITCHES 3.24 More football pitches in the area Provision around existing schools for open space for children to play	020	Cllr. T. Murphy	The Draft LAP area and environs is very well served with playing pitches. Within the Plan area there is Bective Rangers RFC and Wayside Celtic, and immediately adjacent to the Plan area are De Le Salle Palmerstown and Lansdowne Old Wesley. Further north on Ballycorus Road are the proposed playing pitches associated with the Cherrywood SDZ Scheme (yet to be approved by An Bord Pleanala). Although not yet finalised, it is possible that the redevelopment of 'Jamestown Park' (the remediated Ballyogan Landfill) will involve an element of playing facilities. Also, the '8 Acre Field' facility adjacent to the Plan area is comprises, as part of Phase 1 of the project, an all weather multi-purpose GAA/Soccer pitch and associated car-parking. It is considered that this complement of playing pitches is more than adequate for the existing and proposed future population of the area. Recommendation: No change to Draft LAP
LANDSCAPING 3.25 Require developers to plant one tree per residential unit	D024 D036 D037	Gay Wright, Kiltarnan Residents Association, Morrrough Kavanagh	The Manager is not convinced that a policy as prescriptive as " <i>one tree per residential unit</i> " would provide the best outcome in relation to site-specific landscaping proposals. There is a requirement for any residential development greater than 30 residential units in scale, to provide a professionally prepared

			<p>landscaping plan, which should include high quality proposals for landscaping including tree planting on sites. In design terms, the various competing demands between active and passive public and private open spaces within new developments means that site specific proposals, tailored to the characteristics of the site and the development, are considered to be the best approach to ensuring a quality landscaping outcome, rather than a blanket, one-size-fits-all policy.</p> <p>Recommendation: No change to Draft LAP</p>
<p>LOCATION OF HIGH DENSITY LANDS</p> <p>3.26 Submission asserts that the Ballyogan Road area would be a more appropriate location for any proposed higher density residential zone in the Draft LAP area, on account of existing public transport infrastructure and services located there.</p> <p>Furthermore, the proposed higher density residential area is inappropriate due to poor drainage in the area.</p>	D029	Jonathon Huet	<p>While there is certainly some merit in the suggestion that the existing retail/commercial services and public transport infrastructure on Ballyogan Road make it a candidate for higher residential densities, the lands within the Draft LAP which are designated as 'Medium/Higher Residential Density' are well located also. These lands fall predominantly within the 1km catchment of the Ballyogan Wood Luas Stop and will see further improvements in access as the local road network between Ballyogan Road and the Glenamuck Road is developed.</p> <p>The Manager is confident that the implementation of on-site Sustainable Urban Drainage Systems (SUDS) for each development, combined with the implementation of a regional-wide public surface water drainage attenuation system, will provide adequate surface water drainage capacity within the Plan area.</p> <p>Recommendation: No change to Draft LAP</p>
<p>SITE SPECIFIC – OBJECTION TO LOCATION OF GDDR/ATTENUATION PONDS</p> <p>3.27 Submission relates to a site just outside the Draft LAP boundary, to the northeast of the Plan area adjacent to the roundabout at the entrance to The Park, Carrickmines. The lands in question are affected by both the proposed GDDR and also a surface water attenuation pond objective. The landowner objects to the proposed location of the attenuation ponds on his lands – the ponds are intended to serve development within the LAP area and should be located within the Plan area.</p> <p>Also, the GDDR is provided to facilitate development within the LAP lands yet the proposed road alignment adversely affects the landowners' site, outwith the LAP boundary, rendering the site undevelopable. It is</p>	D032	Patrick Mooney	<p>A detailed analysis has been carried out for the specification and location of the surface water attenuation ponds. The location of the attenuation ponds were selected on a number of criteria. Several surface water drainage catchment areas within the Draft LAP were identified and the location of the ponds were chosen on the basis of topography within each catchment, existing land use, archaeology and ESB lines. It was considered desirable to locate a number of ponds along the length of the Glenamuck Stream to lessen the impact on its existing hydrology.</p> <p>The site identified in the submission, located adjacent to Glenamuck Stream, was assessed as meeting the various criteria for site selection for attenuation ponds and was chosen on this empirical basis.</p> <p>Likewise, the selection of the alignment for the GDDR was determined on a range of criteria and the Manager is satisfied that the proposed alignment meets the various requirements of the Draft LAP in full.</p> <p>Recommendation: No change to Draft LAP</p>

requested to re-route the proposed alignment.			
<p>LAP BOUNDARY/S49 LEVY/'THE PARK'</p> <p>3.28 Submission raises a number of issues:</p> <ul style="list-style-type: none"> • In light of the recent An Bord Pleanála decision in relation to the District Centre zoned lands at The Park, Carrickmines, these lands should be rezoned to 'Neighbourhood Centre' • The LAP boundary should be extended to encompass the Kiltiernan Sport Hotel, which has potential to operate as a 'centre for sustainable education'. • In relation to any new S49 scheme, the Council should ensure that local tax payers should not have any 'financial burden or risk' put upon them. 	D035	Tom Kivlehen	<p>The issue of rezoning lands is not within the remit of a Local Area Plan process, but is more appropriately considered during the County Development Plan review process. The zoning of land at 'The Park' is a matter for determination during the forthcoming review of the County Development Plan.</p> <p>The Draft LAP boundary does not extend to the Kiltiernan Sports Hotel primarily on the basis that the large expanse of lands to the southern boundary of the Plan which extends to and includes the Sport Hotel are zoned for 'High Amenity' and therefore preclude development of any significance. The purpose of the Draft LAP is to provide guidance on the residential/commercial/employment zoned lands in the area.</p> <p>The Draft LAP anticipates that the Section 49 Supplementary Development Contribution Scheme will be comprehensively reviewed following adoption of the Plan.</p> <p>Recommendation: No change to Draft LAP</p>
<p>SPELLING OF KILTIERNAN</p> <p>3.29 A number of submissions called for the spelling of Kiltiernan in the Draft LAP to change to 'Kilternan'</p>	D036, D037, D039	Kiltiernan Residents Assoc., Morrrough Kavanagh, Aileen Eglington	<p>The issue if the appropriate spelling for Kiltiernan has been a contentious issue and arose during the previous Local Area Plan process in 2007. In the Draft LAP, the version of 'Kiltiernan' is used based on the spelling that has been used by the Ordnance Survey since 1837.</p> <p>The Draft LAP goes on to state that "<i>The spelling of the place name 'Kiltiernan' or 'Kilternan' has varied over the years from as early as the 17th Century, with references from various periods alternating between the spellings.</i></p> <p><i>In the Ordnance Survey Field Name Books, a number of variations are listed. Older versions of the place name in approximate chronological order from the 17th Century include: Kiltyernan, Killternan Parish, Kilturnan and Ballibetagh, Killturnan and Ballybetagh and Killternann. The researchers of the Ordnance Survey place name division recorded the following versions of the name in use in the early 19th Century: Cill Tigearnain, Kieltiernan, Kiltiernan and Kilternan.</i>" P.iv.</p> <p>The Manager is satisfied that the use of the official placename as recorded by the Ordnance Survey of Ireland is the appropriate placename to use. The definitive legal placenames of the country are contained in the maps of Ordnance Survey Ireland which date back to the time of the original mapping and valuation of the country between 1824 and 1874 and the publication of a townlands index with the 1851 census. These are deemed to be the legal placenames of the State.</p> <p>Recommendation: No change to Draft LAP</p>

<p>DOLMEN 3.30 A number of submissions raised the issue of public access to National Monuments adjacent to the Plan area, in particular the Druids Altar Dolmen, to which there is no public access presently.</p>	<p>D036, D039</p>	<p>Kiltiernan Residents Association, Aileen Eglinton</p>	<p>A purported right-of-way described as "<i>Bishops Lane to Druids Alter via Kiltiernan Abbey</i>" was included in the County Development Plan 2004-2010. The purported right-of-way was located over private property. Further to appeals to the Circuit Court a portion of the Druids Alter right-of-way was subsequently deleted from the County Development Plan 2010-2016. The designation of a National Monument, if located on private lands, does not automatically provide for or facilitate public access to the monument.</p> <p>Recommendation: No change to Draft LAP</p>
<p>GOLDEN BALL 3.31 At least the frontage of the Golden Ball pub should be included on the Record of Protected Structures.</p>	<p>D036</p>	<p>Kiltiernan Residents Association.</p>	<p>The submission seeks the inclusion of the facades of the Golden Ball pub on the Record of Protected Structures. The DoECLG Architectural Heritage Protection Guidelines for Planning Authorities discourages the protection of the façade or part of a structure as "<i>..generally a façade relates integrally to its building..</i>". Furthermore, the building has been extensively remodelled and refurbished over time such that many of the features that may have warranted protection have been heavily altered and adulterated.</p> <p>Protection is afforded to buildings in Kiltiernan that are representative of the local vernacular, but are not on the Record of Protected Structures through Policy AR12 of the County Development Plan 2010-2016. This policy seeks to protect the vernacular heritage of the County and states that "<i>It is Council policy to retain, where appropriate and encourage the rehabilitation and suitable reuse of the vernacular heritage and existing older buildings where appropriate, in preference to their demolition and redevelopment.</i>"</p> <p>Recommendation: No change to Draft LAP</p>
<p>ESB LINES 3.32 Welcomes the proposals to underground the 220kv power lines.</p>	<p>D038, D044</p>	<p>Niall Carroll, James Grimes</p>	<p>Submissions are noted</p> <p>Recommendation: No change to Draft LAP</p>
<p>LANDOWNER/DEVELOPER CONSORTIUM 3.33 A wide-ranging submission on behalf of a consortium of landowners/developers within the LAP area. Main points raised: Landowners outline a scenario whereby they cede land for the construction of the proposed GDDR/GLDR network. Simultaneous to this would be the undergrounding of the</p>	<p>D043</p>	<p>Landowners Consortium – Carrickmines Partnership Mr Cowley Jackson Family O'Mahoney Finnerty Mr. Start</p>	<p>The Manager welcomes the co-operative approach being pursued by the main landowners/developers in the Draft LAP area. It is acknowledged that the complexity of delivering infrastructure across a fragmented land ownership such as Kiltiernan-Glenamuck creates considerable difficulty for both developers and the Local Authority and a co-operative approach can greatly enhance the prospect of timely and successful delivery of such infrastructure.</p> <p>Powerlines:</p>

<p>powerlines, the cost of which should be borne by the Local Authority.</p> <p>Powerlines: The proposed new roads in the Draft LAP area and the undergrounding of the powerlines would have a wider benefit than just for locally generated development – therefore development across a wider catchment should contribute financially to these projects. Also, Draft LAP should include actions – including an ‘Implementation Plan’ – to ensure the undergrounding of the lines is progressed.</p> <p>Attenuation Ponds – size of ponds should be quantified and explained. If on-site attenuation for development is also required, the communal attenuation ponds should be reduced in size.</p> <p>Greenways – general support for provision of greenways. However, extensive greenway at eastern edge of Primary NC lands should be removed.</p> <p>Implementation/Phasing Map An implementation/phasing map should be prepared in advance of the 2nd phase of public consultation, to allow for comment on same.</p> <p>Section 49 Development Contribution Scheme The Draft LAP should be more prescriptive in setting out the basis for revision of the S49 Scheme. The proposed road network improves connectivity across a wider area and the catchment for contribution to the cost of the scheme should be widened to reflect this.</p> <p>Residential Density A report on residential density accompanies the submission. The Partnership lands are suitable for a ‘kick-start’ approach to development as recommended in the NTA document. It is stated that at 45dph and above, developments require an element of apartment provision. Underground car-parking is not economically viable. It is stated that an overall residential</p>		<p>The overwhelming proportion of the ‘planning gain’ from the undergrounding of the 220kv high voltage overhead lines – both in terms of unlocking the development potential of zoned, serviced land and of improving visual and residential amenity - will accrue within the Draft LAP lands. Likewise, without the proposed new distributor roads infrastructure, it would not be possible to develop a large proportion of the zoned lands and it would not be possible to deliver on a high quality Village Core, bypassed by heavy traffic volumes. It is certainly reasonable, in the view of the Manager, that the Section 49 Supplementary Development Contribution Scheme boundary include the Draft LAP lands as the primary beneficiaries of this proposed infrastructure. It should also be noted that the Section 49 Scheme as currently formulated provides for a sizeable contribution from Dun Laoghaire-Rathdown County Council, from general revenues.</p> <p>In relation to the proposal for an ‘implementation plan’ for the undergrounding of the powerlines, the Manager would reiterate its commitment to the undergrounding of the lines and its continued efforts to work with landowners and other stakeholders such as ESBI and Eirgrid to ensure same. It must be acknowledged that the other agencies involved have their own responsibilities and priorities (in relation to energy transmission rather than land-use), and any ‘implementation plan’ must have their support. There is no value in the Council unilaterally producing an ‘implementation plan’ without first establishing an agreed way forward with the relevant stakeholders.</p> <p>Attenuation Ponds A detailed analysis was carried out for the specification and location of the surface water attenuation ponds. The location of the attenuation tanks were selected on a number of criteria. Several surface water drainage catchment areas within the Draft LAP were identified and the location of the tanks were chosen on the basis of topography within each catchment, existing land use, archaeology and ESB lines.</p> <p>It is a requirement of the GSDS to implement SuDS for all new developments and development areas. There is also a requirement for a ‘treatment train’ approach which incorporates source, site and regional control.</p> <p>In relation to the scale of the proposed attenuation tanks and the land-take required, the Manager would note that the overall development areas in the Draft LAP have not been reduced. The proposed land-take for road areas have been reduced, but only marginally. The attenuation ponds areas/volumes can be reduced to reflect the reduced road areas, however no major decrease in numbers/scale is anticipated. The ponds have been sized to accommodate flows emanating from within the Draft LAP area only. In relation to the issue of on-site attenuation and ‘regional’ attenuation, it is the practice of the Council, given the extremely critical nature of flood risk, that to safeguard against the undersizing and/or failure of developments’ SuDS devices within individual developments and an overall increase in impermeable area, flow from development areas should be accommodated in the regional SuDS devices.</p>
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<p>density of 37/38uph can deliver a similar overall number of units as the proposed density bands of the Draft LAP.</p> <p>Neighbourhood Framework Plan (NFP) The inclusion of the NFP as part of the Draft is a concern to the Partnership. The NFP may be used in an overly prescriptive fashion. In time, with further retail/commercial developments at the Park, a smaller quantum of development at the NC sites will be required. The proposed Village Green is too large. It is recommended that the NFP be removed from the Plan.</p> <p>Secondary Neighbourhood Centre It is recommended that this parcel be rezoned for residential purposes – it is at odds with other objectives of the Plan and weakens focus on the primary NC.</p> <p>Parking Flexibility in parking policy is required – underground parking will not be economically viable.</p> <p>Access to Site 23A (Ballycorus Road) Access should be provided to this site via the GLDR, as most of it is landlocked from the Ballycorus Road.</p> <p>Bus Gates Proposed bus gate location on the Enniskerry Road should not restrict access for residents of existing cottages to the Village centre. Proposed bus gate at Glenamuck Road will act as a disincentive for residents to use the Village Centre at Kiltiernan – it should be removed or relocated to the opposite (north-eastern) end of Glenamuck Road.</p>		<p>Greenways General support for the proposed Greenway is noted. It is the intention of the Draft LAP that the location of the proposed Greenway is indicative – the legend on the Draft LAP map states clearly ‘Indicative Greenway Link’ and the Draft LAP makes reference to the indicative nature of this proposed linkage. It is considered reasonable that the hatched area indicated on Parcel 20A indicates a possible alignment for the Greenway along either the proposed walkway/cycleway or along the proposed access road from the Neighbourhood Centre lands, giving a generous level of flexibility as to its final location.</p> <p>Implementation/Phasing Map It is proposed to include a phasing map as part of the revisions to the Draft LAP.</p> <p>Section 49 Development Contribution Scheme The revision of the Section 49 Supplementary Development Contribution Scheme will include an assessment of the appropriate boundary for the Scheme. Any proposed infrastructure of the scale proposed in the Draft LAP will benefit in direct terms, the immediate environs and in a more indirect way, the wider County.</p> <p>Residential Density The submission suggests that the Draft LAP area is suitable for a ‘kick-start’ approach as advocated in a recent, but as yet unpublished NTA study. This approach is advocated for areas defined as “<i>rail-based large and medium scale residential development areas in Dublin</i>” and the proposal aims to facilitate some lower-density development in the short-term while seeking to “<i>retain key high density locations for later development phases</i>”. Specific areas were identified in the Greater Dublin Area for such a possible approach. Tellingly, Kiltiernan-Gleamuck was not one of them – on the basis that the residential densities in the Draft LAP were of a relatively moderate scale and were not classified as ‘high density’ in accordance with to the Study’s criteria.</p> <p>The Partnership’s proposal on residential density seeks a lower level of density than is acceptable to the Manager. The fact that a large proportion of the Draft LAP lands are beyond the 1km catchment for the Luas line, is reflected in the relatively low densities proposed.</p> <p>Policy on residential density is guided by the Sustainable Residential Development in Urban Areas (2008), which notes that in relation to ‘Outer Suburban / ‘Greenfield’ sites’ which may be defined as “<i>open lands on the periphery of cities or larger towns whose development will require the provision of new infrastructure, roads, sewers and ancillary social and commercial facilities, schools, shops, employment and community facilities.</i>” That “<i>the greatest efficiency in land usage on such lands will be achieved by providing net residential densities in the general range of 35-50 dwellings per hectare and such densities (involving a variety of housing types where possible) should be encouraged generally.</i>”</p>
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			<p>location should be south of the existing dwellings on this section of Enniskerry Road.</p> <p>Recommendation: Amend the Draft LAP as follows: Include a 'Phasing Map' on Page 58, to illustrate the phasing proposals outlined in the Draft LAP on page 57.</p>
<p>SITE SPECIFIC 3.34 Submission from landowner of Parcels 1 (Zoned Employment) and part of Parcel 2 (Zoned Residential). Several issues raised:</p> <p>Access Access to landholding should be via the GDDR. Access via The Park scheme is not a long-term option.</p> <p>Attenuation Ponds Proposal for a pond on Parcel 2 is inequitable. These facilities should be placed 'more evenly' throughout the Plan area. As the Parcel is 'medium/high density residential', additional health and safety considerations will apply.</p> <p>Water & Drainage Map No. 12 – 'Water and Drainage' the drainage line indicated now aligns with the GDDR</p>	D044	James Grimes	<p>Access to Development Parcels 1 and 2 is envisaged via a proposed development driven junction with the GDDR at a point approximately midway between the GDDR/GLDR junction and the Golf Lane roundabout and via the internal development road system linking the existing elements of The Park and thence onto Ballyogan Road. This is not illustrated on the Draft LAP map, but is referred to in the Written Statement, in relation to Development Parcel 1 "<i>Access to land parcel to be provided at two proposed access points on the GDDR – to the west</i>" P.58. In the interests of clarity, it is recommended that a similar objective should be added to the guidelines for Parcel No. 2</p> <p>A detailed analysis was carried out for the specification and location of the surface water attenuation ponds. The location of the attenuation tanks were selected on a number of criteria. Several surface water drainage catchment areas within the Draft LAP were identified and the location of the ponds were chosen on the basis of topography within each catchment, existing land use, archaeology and ESB lines. It was considered desirable to locate a number of ponds along the length of the Glenamuck Stream to lessen the impact on its existing hydrology.</p> <p>The site identified in the submission, located adjacent to Glenamuck Stream, was assessed as meeting the various criteria for site selection for attenuation ponds and was chosen on this empirical basis. The reference to '<i>additional health and safety considerations will apply</i>' is unclear and without foundation.</p> <p>The reference in the submission to the correct location of water/drainage lines is unclear – the Map No.12 was prepared in consultation with the Water and Drainage Department and represents an accurate reflection of the infrastructure in the area.</p> <p>Recommendation: Amend the Draft LAP as follows: Include the following text in the Section 11, Planning Guidelines for Development Land Parcels – Development Parcel 2 (P.59) "<i>Access to land parcel to be provided at an access point on the GDDR</i>"</p>
<p>SITE SPECIFIC ISSUES - ACCESS 3.35 Submission refers to a landholding along Glenamuck Road, encompassing Parcels 27B, 26A, 26B, 25, 24A, 23B, 26A and part of 20A. Issues raised:</p>	D047	Jackson Family	<p>The comments in relation to the undergrounding of the 110kv high voltage powerline are noted. The opportunity to secure the undergrounding of sections of the 110kv lines that traverse the Draft LAP lands are presently the subject of discussions with stakeholders at ESBI and Eirgrid.</p>

<ul style="list-style-type: none"> • 110kv line which traverse 27B should be undergrounded. • Access to 27B and 27C: Proposals for accessing these lands should be determined at design stage and proposals restricting access via the Link Road should be omitted. • Policy wording relating to Proposed Greenway Link should be revised to allow for flexibility during detailed design stage, in consultation with landowners. 			<p>It is agreed that the wording of the Draft LAP should be amended to provide greater clarity re: the access arrangements for Land Parcel 27C and 27B. It is recommended that the access arrangements for Land Parcel 27C should state that access should be taken from the proposed Glenamuck Link Distributor Road. For Land Parcel 27B, it is appropriate that localised access arrangements be determined at detailed planning stage.</p> <p>The Manager is satisfied that there is an appropriate level of flexibility in the Draft LAP with regard to the alignment and extent of the Greenway Link – the legend on the map and references in the Written Statement refer to an “indicative” greenway link.</p> <p>Recommendation: Amend the Draft LAP as follows: Amend the following text in the Section 11, Planning Guidelines for Development Land Parcels – Development Parcel 27B (P.86): “To be accessed from existing Glenamuck Road. No access to site from proposed Link Road.” “Detailed access arrangements to be clarified at planning application stage.”</p> <p>Amend the following text in the Section 11, Planning Guidelines for Development Land Parcels – Development Parcel 27C (P.87): “To be accessed from existing Glenamuck Road. No access to site from proposed Link Road.” “To be accessed from the proposed Glenamuck Link Distributor Road.”</p>
<p>SITE SPECIFIC ISSUES – ACCESS/REZONING</p> <p>3.36 Submission refers to the section of the GLDR ‘extension’ from Ballycorus Road to Enniskerry Road, omitted in the 2007 LAP but reinstated in the 2010 County Plan. Submitter is a property owner on Enniskerry Road/Barnalingan Lane. Property will be adversely affected by this section of road which severs the landholding. If no access is provided via the GLDR, parts the landholding will be inaccessible.</p> <p>Submission also suggests a residential zoning for part of the lands to the east of the GLDR.</p>	D050	Aiveen Byrne	<p>The general issue of the ‘extension’ of the GLDR is addressed in Section 3.8 of this document.</p> <p>The alignment of the GLDR between the Enniskerry Road and Ballycorus Road has strategic importance to the LAP and the routing of traffic to/from outside the study area. It also enables the effective bypassing of Kiltiernan Village as traffic from Enniskerry is directly routed towards the GDDR</p> <p>It is acknowledged that there are some severance and other environmental impacts caused by the proposed section of the GLDR between Ballycorus Road and Enniskerry Road. At detailed design stage and as an integral part of any planning application by the County Council to An Bord Pleanala, these potential issues will be the subject of an Environmental Impact Statement so that they can be mitigated in so far as possible. Where property is compulsorily acquired for the proposed road infrastructure it will be a matter of compensating property owners for any injurious effects arising from the Scheme.</p> <p>The current alignment proposed for the tie-in of the GLDR to the Enniskerry Road</p>

			<p>is considered to be the optimum alignment to meet the objectives of the Draft LAP.</p> <p>The issue of rezoning additional residential lands in the area is not a matter that can be considered as part of a Local Area Plan – rezonings can only be considered as part of the County Development Plan process.</p> <p>Recommendation: No change to Draft LAP</p>
<p>REZONING REQUEST</p> <p>3.37 Submission seeks the rezoning of 1a c.9ha site outside the LAP boundary (at the north-west corner) from Objective 'B' (Agriculture) to Objective 'A' (residential). The submission states that the subject lands, unlike lands with the Draft LAP are not dependent on new roads infrastructure and can commence development immediately.</p> <p>The submission also suggests a Specific Local Objective could apply to the said lands, requiring the provision of a 'Retirement Community'.</p> <p>The submission also seeks a review of the Section 49 Contribution Scheme on the grounds that in its present form, it renders development unfeasible.</p>	D052	Droimsi Developments	<p>The site in question does not lie within the Draft LAP boundary. Irrespective, in general terms, the issue of rezoning additional residential lands in the area is not a matter that can be considered as part of a Local Area Plan – rezonings are considered as part of the County Development Plan process.</p> <p>The review of the County Development Plan 2010-2016 begins in early 2014 and the matter can be considered, along with all other zoning issues, at that stage.</p> <p>As an aside, the Manager is completely unconvinced by the argument advanced in the submission that the subject lands are somehow 'not dependent' on new roads infrastructure – as if the overall proposals in the Draft LAP for a bypass of Kiltiernan Village Core and the roads infrastructure required to effect this, somehow do not apply to the lands in question.</p> <p>Recommendation: No change to Draft LAP</p>

Key Issue	Sub. No.	Name	Manager's Response & Recommendation
<p>SITE SPECIFIC ISSUES – ACCESS AND DEVELOPMENT GUIDELINES</p> <p>3.38. Both submissions relate primarily to Land Parcel 12 (specifically 'Rockhurst' House and gardens) on the Enniskerry Road. Submission D021 addresses the issue of development guidelines for the site. Submission D022 addresses the issues of vehicular access arrangements from the Enniskerry Road and boundary treatments proposed in the Plan.</p> <p>Submission D021 states that, on the basis of an increase in the population of elderly people, provision should be made in the Draft Plan for some single storey housing. The submission questions the density and height provisions for Land Parcel 12 in the Plan (stated as 35-40dph and up to 3 storeys) and states that the Plan should allow discretion to relax these standards downwards in certain circumstances.</p> <p>Submission D022 expresses concerns regarding two statements in the Draft Plan – one noting that there is a presumption to limit the number of individual vehicular access points onto Enniskerry Road and another stating that development in this area will be designed "behind stone walls". It is contended that these objectives are not consistent with the recently published "Design Manual for Urban Roads and Streets" (DoECLG/DoTT).</p>	<p>D021 D022</p>	<p>C . MacDonnell</p>	<p>With regard to the issue of development guidelines for Land Parcel no. 12, the Manager is satisfied that the density/building height provisions proposed are appropriate. A residential density of 35-40dph is proposed and, as with other density ranges in the Draft LAP, these are consistent with the Government guidance document '<i>Sustainable Residential Development in Urban Areas (2008)</i>'. The Guidelines note that in relation to 'Outer Suburban / 'Greenfield' sites' which may be defined as "...open lands on the periphery of cities or larger towns whose development will require the provision of new infrastructure, roads, sewers and ancillary social and commercial facilities, schools, shops, employment and community facilities." that "...the greatest efficiency in land usage on such lands will be achieved by providing net residential densities in the general range of 35-50 dwellings per hectare and such densities (involving a variety of housing types where possible) should be encouraged generally."</p> <p>In relation to building height, the provisions relating to Land Parcel No. 12 note that building heights of 2-3 storeys would be appropriate. The Submission states that a 3-storey element to the west of Enniskerry Road would interfere with views toward the Dublin Mountains and would be inconsistent with County Development Plan policy in this regard. It should be noted that the full text in the Draft Plan outlining the criteria for building height in Land Parcel 12 states the 3-storey element should be "<i>focused along the interface with Enniskerry Road, and at other appropriate locations throughout the area, most notably, but not exclusively, at areas facing the internal loop access road, within the extent of the NC related buildings, to define frontage, as corner elements at road junctions, and at key entrances to sites.</i>" The Manager is satisfied that these are entirely reasonable criteria for assessing proposals for 3-storey developments in Land Parcel 12 and would note that the policy in the County Development Plan in relation to Views and Prospects (Policy LHB4) will apply to any proposal.</p> <p>For the avoidance of doubt, Enniskerry Road is a Regional Road (R117). In relation to the objective in the Draft Plan to curtail access points directly off the Enniskerry Road for individual properties, it is considered that this approach is consistent with the Council's overarching policies on vehicular entrances whereby regard is had to traffic conditions and public safety and a preference is</p>

Key Issue	Sub. No.	Name	Manager's Response & Recommendation
			<p>maintained for rationalising development-driven access points onto Regional Roads.</p> <p>In relation to the objectives in the Draft Plan with regard to the Secondary Neighbourhood Centre, the Draft Plan states that:</p> <p><i>"A self contained development of complementary uses will be created at the secondary Neighbourhood Centre. With the exception of some minor retail connected to Palmer's Pub, development will be designed and set behind stone walls and trees and will not present commercial or retail frontage to the Enniskerry Road in competition with the primary centre." (P.101.)</i></p> <p>It is envisaged that the majority of development along the Enniskerry Road – residential, commercial and community-related - will address the road and will provide active frontage to the street, as recommended in the "Design Manual for Urban Roads and Streets". The proposals limiting retail/commercial frontage at the Secondary Neighbourhood Centre are unique and are proposed as a means of prioritising the Primary Neighbourhood Centre as the de-facto 'Village Centre'.</p> <p>Recommendation: No Change to Draft Plan</p>

APPENDIX A: DRAFT KILTIERNAN GLENAMUCK LAP 2013 LIST OF SUBMISSIONS BY REFERENCE NO.

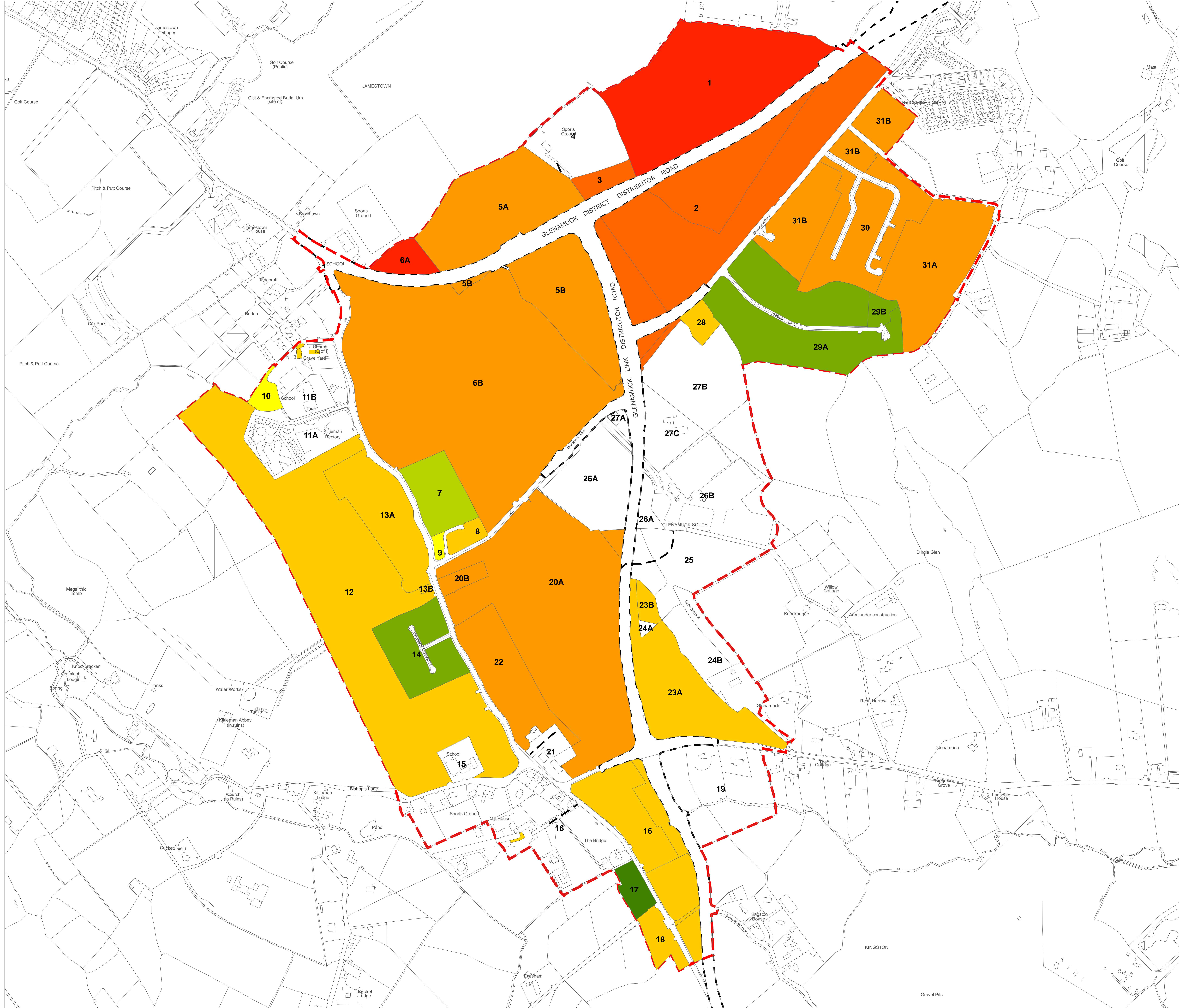
REF NO	NAME	ORGANISATION
D001	John Findlater	
D002	Rationalist Era	
D003	Tara Spain	National Roads Authority
D004	David Strahan	
D005	Cian O'Mahony	Environmental Protection Agency
D006	Dora Cronin	HSE Dublin Mid-Leinster
D007	Adam O'Neill	
D008	Sonya Buckley	
D009	David Rowe	South Co Dublin Ass of An Taisce
D010	Chand and Anneli Kohli	
D011	Debbie Anderson	
D012	Mark and Kerry Byrne	
D013	Michael Coll	
D014	Yvonne Callaghan	
D015	Tony Conway & 2 others	on behalf of Bective Rangers FC
D016	Barbara Dwyer Salsi	
D017	Barbara Dwyer Salsi	
D018	Frances Dunne	on behalf of Inland Fisheries Ireland
D019	Brian Fareilly	
D020	T Murphy Cllr	
D021	C MacDonnell	
D022	C MacDonnell	
D023	Laura O'Kiersey	on behalf of Senan, Aisling, Lana, Yvonne and Alan O'Kiersey
D024	Gay Wright	
D025	Bernie Dwyer	

REF NO	NAME	ORGANISATION
D026	Niamh Scully	
D027	Jan Coll	
D028	Susan Jenkins	
D029	Jonathan Huet	
D030	Philip Thompson	
D031	Colman Curran	on behalf of Ballycorus Heritage Com Ltd
D032	Tracy Artrong	Fenton & Associates on behalf of Patrick Mooney
D033	Kathleen Jacobi	Railway Procurement Agency
D034	Paul O'Leary	Carrickmines Equestrian Centre
D035	Tom Kivlehan	The Green Party
D036	Aileen Eglington	Kilternan/Glenamuck Residents Assoc
D037	Morrough Kavanagh	
D038	Niall Carroll	
D039	Aileen and Paul Eglington	
D040	Lisa O'Sullivan	
D041	Tadhg MacNamara	National Transport Authority
D042	Hugh O'Sullivan	
D043	Colin McGill	McGill Planning on behalf of Consortium of Landowners
D044	James Grimes	
D045	Gael Gibson	Eirgrid
D046	Paul Turley	John Spain Associates
D047	Paul Turley	John Spain Associates on behalf of The Jackson Family
D048	John O'Leary	
D049	Dervla McCormack	
D050	Aiveen Byrne	
D051	Patrick O'Sullivan	Minister for The Environment Community & Local Gov
D052	Sally-Ann Mitchell	
D053	Deirdre Carroll Cunniffe	
D054	Eddie McWilliams	Fónua
D055	Tom Phillips	Tom Phillips & Associates on behalf of Droii Developments Ltd & Others
D056	Mona Stafford	
D057	The Occupier	
D058	B H Pierce	
D059	Shane Ross TD	
D060	Dermot Haughey	

Appendix B – Two Maps Accompanying Manager’s Report:

Phasing Map

Building Heights Map

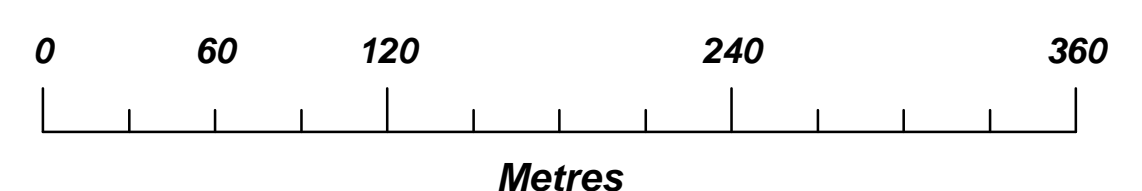


Legend

Building Heights

- No Height Specified
- 1 Storey
- 1-2 Storeys
- 1-3 Storeys
- 2 Storeys
- 2-3 Storeys
- 2-4 Storeys
- 2-5 Storeys
- 3-5 Storeys

NOTE: The lines of road proposals and surface water attenuation ponds on this map are diagrammatic only and are subject to change during the detailed design stage.



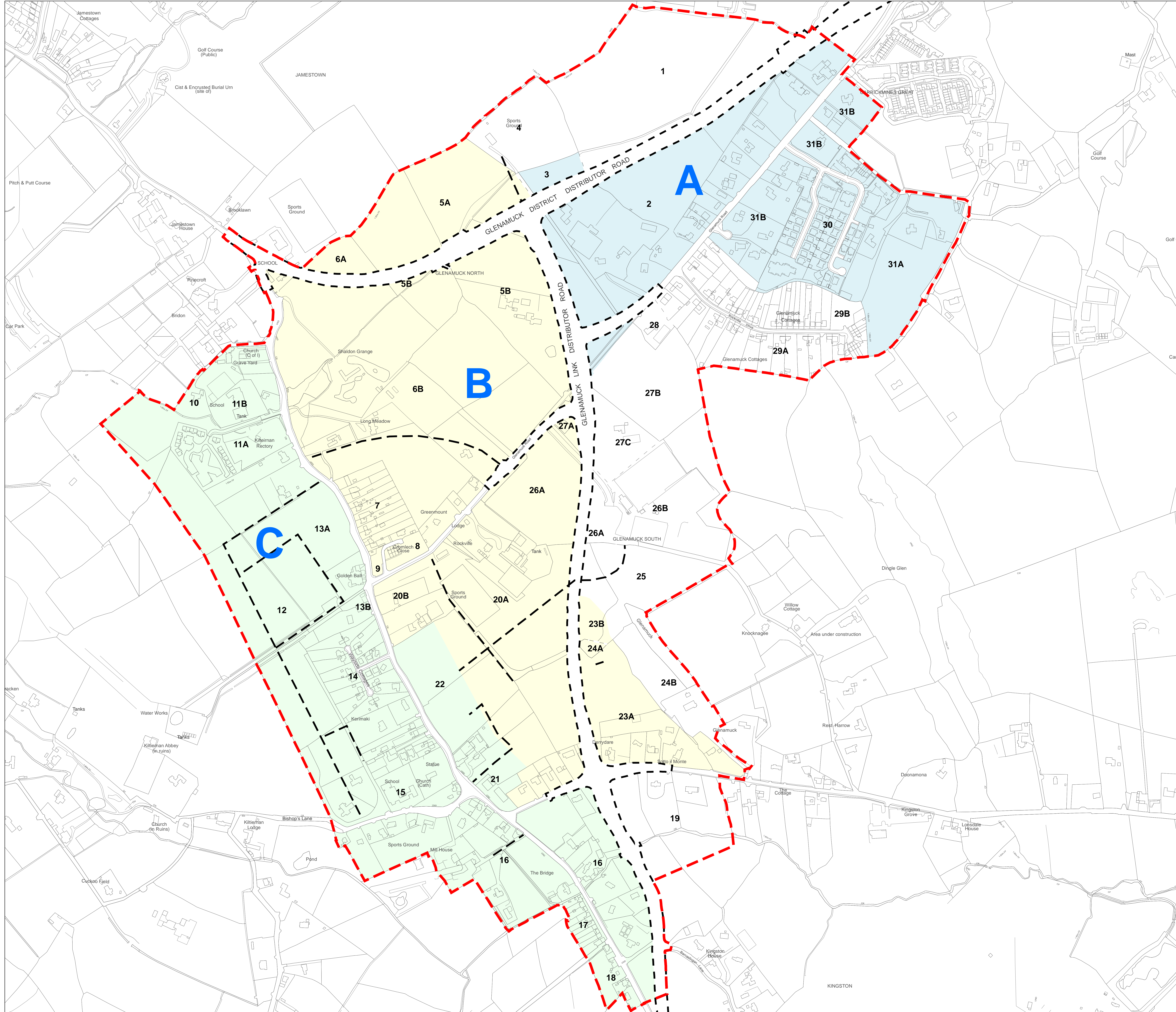
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Planning Department
 G. Hayden
 Director of Planning



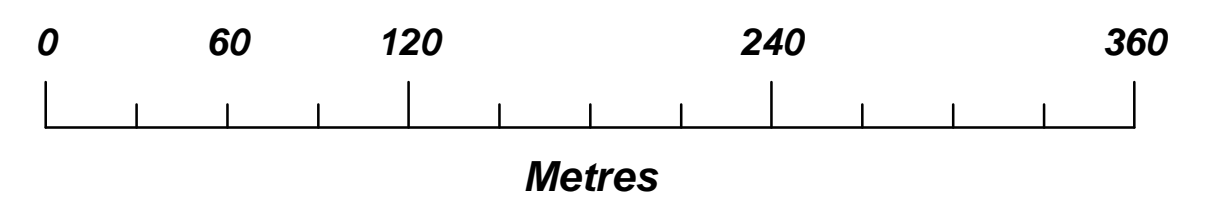
**Draft Kiltiernan / Glenamuck
 Local Area Plan 2013
 Building Heights Map**

Senior Planner: D.Irvine	Chief Technician: M. Hevehan
Prepared By: C. Fulcher	Drawn By: A. Ayeni
Date: July 2013	Scale: NTS
	Drawing No: PL - 12 - 341



- LEGEND**
- Phasing A - Glenamuck Road Upper/North Portion (c. 200 dwelling units)
 - Phasing B - Node at Junction of Enniskerry and Glenamuck Roads (c.150 Dwelling Units)
 - Phasing C - Concentrated at Village Core / Along Enniskerry Road (c. 350 Dwelling Units)

NOTE: The lines of road proposals and surface water attenuation ponds on this map are diagrammatic only and are subject to change during the detailed design stage.



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<p>Planning Department</p> <p>G.Hayden Director of Planning</p>	<p>Comhairle Contae County Council Planning Department</p>
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**Draft Kiltiernan / Glenamuck
Local Area Plan 2013
Phasing Map**

Senior Planner: D.Irvine	Chief Technician: M. Hevehan
Prepared By: C. Fulcher	Drawn By: M.Hennessy
Date: July 2013	Drawing No: PL - 13 - 343
Scale: N.T.S	