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<u>PART 1</u>

INTRODUCTION TO MANAGER'S REPORT

Introduction

Background to the Manager's Report

The preparation of this report forms part of the procedure for the making of a Variation to the County Development Plan under Section 13 (6) of the Planning and Development Acts, 2000-2010. Section 13 (6) (ad) (ii) requires that the written submissions with respect to the proposed material alteration and the Strategic Environmental Assessment and Appropriate Assessment of the material alteration, received within a specified period of not less than 4 weeks, shall be taken into account by the planning authority before the Variation of the Development Plan is made.

There is no statutory format required for this process. For consistency purposes this report has been prepared based on the format of the previous Manager's Report on Submissions to Proposed Variation No.2, January 2011. On this basis the report contains:

- A list of the persons or bodies who made submissions or observations (i.e. during the public consultation period of the Proposed Material Alterations to Proposed Variation No.2 to the County Development Plan 2010-2016 and the Strategic Environmental Assessment and Appropriate Assessment of the proposed material alterations).

- A summary of the submissions or observations made.

- The response of the Manager to the issues raised, taking into account the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area, any relevant policies or objectives in the area and any relevant policies or objectives of the Government or of any Minister of the Government.

This report is submitted to the Members of Dún Laoghaire-Rathdown County Council for their consideration as part of the process for the making of proposed Variation No.2 to the County Development Plan 2010-2016. Following consideration of the Manager's Report, the Members may, by resolution make the proposed Variation, with or without further modifications. Under Section 13 (6) (c) a further modification to the Variation:

- May be made where it is minor in nature and therefore not likely to have significant environmental effects on the environment or adversely affect the integrity of a European site
- (ii) Shall not be made where it refers to
 - (I) an increase in the area zoned for any purpose, or
 - (II) an addition or deletion from the record of protected structures.

Strategic Environmental Assessment (SEA)

An Environmental Report accompanies Variation No.2 to the County Development Plan 2010-2016. The Environmental Report contains a detailed analysis of the Sandyford Urban Framework and how the implementation of the Plan would impact on its receiving environment.

It was determined by the Planning Authority that a Strategic Environmental Assessment and Appropriate Assessment were required for certain material alterations, under Section 13 (6) (aa) of the Planning and Development Act 2000-2010 to assess the likely significant adverse effects on the environment. It was considered that the proposed material alterations would not have any significant adverse effect on the environment. These assessments were carried out and made available for inspection (Addendum II Material Alterations), whereby written submissions and observations were invited from the public.

Contents & Format of This Report

Part 2 of this report provides a summary of the issues raised in the submission made by the National Transportation Authority (to note that no submission was made by the Department of Environment, Community and Local Government or the Regional Authority) and the issues raised in each of the other submissions received relating to the material alterations, the Manager's response to the issues and a recommendation to each submission/observation. Where the Manager makes a recommendation to further modify the Plan these are set out in red type.

In order to make the document as user friendly as possible the issues raised have been grouped under a series of umbrella 'headings' which are largely based on the various individual Sections, Appendices, Maps and Drawings as set out in the Sandyford Urban Framework Plan and Map 6 of the County Development Plan 2010-2016.

Part 3 contains Environmental Report: Addendum III which summarises the submissions made in relation to the Strategic Environmental Assessment and Appropriate Assessment of the material alterations, the Manager's response to these issues and a subsequent recommendation.

Part 4 of the report lists those individuals/agencies/groups who made submissions, lists the subject site (if appropriate) and summarises the issue(s) raised in the submission.

Public Consultation

Variation No.2 to the County Development Plan 2010-2016, Material Alterations, including Addendum II (Strategic Environmental Assessment and Appropriate Assessment of the material alterations) and Map 6 of the County Development Plan 2010-2016, were put on public display on Friday 13th May 2011. Written submissions and/or observations were invited for a 4 week period ending Monday 13th June 2011.

The public consultation consisted of:

- Detailed public notices placed in the Irish Times and Irish Independent on 13th May 2011, advising of the consultation period, where the proposed material alterations to proposed Variation No.2 to the Development Plan could be accessed and inviting submissions up to and including the closing date of 13th June 2011.
- The proposed material alterations to proposed Variation No.2 to the County Development Plan were on continuous public display for the duration of the consultation period at the following locations:
 - The Concourse, County Hall, Dún Laoghaire (9.00am-5.00pm)
 - Council Offices, Dundrum Office Park (9.30am-12.30pm and 1.30pm-4.30pm)
- The proposed material alterations to proposed Variation No.2 to the Development Plan were available to view or download from the Council's website, <u>www.dlrcoco.ie</u> and made available at libraries in Blackrock, Cabinteely, Dalkey, Deansgrange, Dún Laoghaire HQ, Dundrum, Glencullen, Sallynoggin, Shankill and Stillorgan, both in hard copy and through the free web access facilities available at each library.
- A Public Information Day took place on Tuesday 24th May, whereby a Council official was available to answer questions at County Hall.
- Submissions/observations in respect of the proposed material alterations to proposed Variation No.2 to the County Development Plan were accommodated through a number of mediums – hard copy, e-mail and through the Development Plan website.

Submissions Received

The County Manager would like to take this opportunity to thank everyone who took the time to make a submission to the proposed material alterations to proposed Variation No. 2 to the County Development Plan 2010-2016.

During the 4-week consultation period a total of 21 no. submissions were received by the Planning Authority. One submission was received after this date.

Part 4 of the Manager's Report lists those individuals/agencies/groups who made submissions, lists the subject site (if appropriate) and summarises the issue(s) raised in the submission. Each submission has been allocated a unique reference number. The information in Part 4 has been set out in two different formats:

- (i) Alphabetically by surname of individual/group or consultant/agent making submission on behalf of a third party and;
- (ii) Numerically relating to date of receipt during the consultation period.

<u>PART 2</u>

SUMMARY OF SUBMISSIONS AND MANAGER'S RESPONSE AND RECOMMENDATION

Submission made by National Transportation Authority				
Key Issue	Sub. No.	Map No.	Manager's Response & Recommendation	
Section 4.2 Multi Modal Transport Infrastrcuture				· · · · ·
(i) Inclusion of the Material Alterations relating to roads infrastructure, car parking and mobility management addresses the concerns of the NTA.	V2A005		Noted. Recommendation No change to proposed Material Alteration.	

Key Issue	Sub. No.	Map No.	Manager's Response & Recommendation
TITLE PAGE			
(i) To remove the dates from the title of the Plan to read "Sandyford Urban Framework Plan" to ensure the Plan will not be obsolete in 2016.	V2A020 V2A021		The Sandyford Urban Framework Plan, on adoption of Variation No.2, will form part of the County Development Plan 2010- 2016. The SUFP will not become obsolete in 2016, but will be reviewed as part of the preparation of the County Development Plan 2016-2022. The date 2011-2016 is considered appropriate as it accords with the life of the County Development Plan which this Plan will form part of. Recommendation No change to proposed Material Alterations.

Key Issue	Sub. No.	Map No.	Manager's Response & Recommendation
SECTION 1. INTRODUCTION			
1.2 Legal Status			
(i) To remove the dates from the title of the Plan to read "Sandyford Urban Framework Plan" to ensure the Plan will not be obsolete in 2016.	V2A020 V2A021		The Sandyford Urban Framework Plan, on adoption of Variation No.2, will form part of the County Development Plan 2010- 2016. The SUFP will not become obsolete in 2016, but will be reviewed as part of the preparation of the County Development Plan 2016-2022. The date 2011-2016 is considered appropriate as it accords with the life of the County Development Plan which this Plan will form part of. Recommendation No change to proposed Material Alterations.

Key Issue	Sub. No.	Map No.	Manager's Response & Recommendation
SECTION 2. FUTURE LAND USES			
Section 2.3.3 Zone 3 Office Based Employment and Map 1			
(i) Welcome the rezoning of land from 'F' to 'OE'.	V2A016 V2A020	1	Noted. Recommendation No change to proposed Material Alteration.
(ii) Object to proposal to amend Objective OE1 – Open Space requirements - to exclude suitable boundary treatments. The open space requirement to serve commercial uses is excessive. The requirement should therefore be net of boundary treatments.	V2A019		The Manager does not agree with this submission. The requirement to provide 10-15% of the site area for open space was originally calculated on the basis of excluding boundary treatments and set backs as these areas tend not to be useable areas of open space. The inclusion of the wording in Objectives, OE1, MC7, LIW1 and MH1 was to provide clarity. To include these set back areas in the 10-15% provision, would compromise the overall open space available to employees and/or the public in the case where pocket parks are to be provided. The requirement for the provision of 10-15% of open space is set out in Section 16.4 of the County Development Plan 2010-2016. The Manager recommends that the proposed Material Alteration be retained. Recommendation No change to proposed Material Alteration.
(iii) No objection to rezone 'LIW' to 'OE' (154-2)	V2A020	1	Noted. Recommendation No change to proposed Material Alteration.
Section 2.3.6 Zone 6 Medical and Map 1			
(i) No objection to rezoning from 'LIW' to 'MH' (154-1)	V2A020	1	Noted. Recommendation No change to proposed Material Alteration.
Section 2.3.9 Unfinished Housing Estates and Section 2.5 Density and Scale Objective DS5			

Key Issue	Sub. No.	Map No.	Manager's Response & Recommendation
(i) Welcome the acknowledgement of the role the Council have to play in resolving unfinished housing estates. Local residents should be consulted regarding any future plans for these developments. To include a statement on the negative effects of these developments as follows: "The Council will actively engage with stakeholders, including local residents, to this end"	V2A002 V2A009 V2A020 V2A021		 Dún Laoghaire-Rathdown County Council will accord with the requirements of the Department of the Environment, Community and Local Government Guidance manual, 'Managing and Resolving Unfinished Housing Developments'. The Planning and Development Act 2000-2010 makes provision for public consultation, by way of observations/submissions during the planning process but does not make provision for public consultation prior to the lodgement of a planning application. In that regard the Manager does not agree with the recommendation put forward in these submissions. Since the material alterations were put on public display the Department of the Environment, Community and Local Government published "Resolving Ireland's Unfinished Housing Developments – Report of the Advisory Group on Unfinished Housing Developments" and "Resolving Ireland's Unfinished Housing Developments – Response to the Advisory Group Report on Unfinished Housing Developments". Since the material alterations were put on public display the Department of this Manager's Report of the Advisory Group on Unfinished Housing Developments – Response to the Advisory Group Report on Unfinished Housing Developments. "At the time of preparation of this Manager's Report the publication by the Department of "A Best Practice Guidance Manual on Managing and Resolving Unfinished Housing Developments" is awaited. The documents already published make it clear that residents of unfinished housing developments. The Manager considers that the material amendments make it clear that the Council will implement the recommendations of the Advisory Group in relation to the involvement of residents of unfinished housing developments. Recommendation No Change to proposed Material Alteration.
2.5 Density and Scale and Map 2		+	
(i) Object to reduction in plot ratio on portion of ESB site (plot B). The redevelopment of the site is not sustainable at a plot ratio of 1:0.5 – commercially nonviable, delivery of high quality urban environment road infrastructure and pocket park is not achievable. ESB site is located in the key centre of employment and central to Southern Economic Corridor (Economic Development Action Plan 2009). Request increase of plot ratio from proposed amendment 1:0.5 to 1:1 to support DLRCC	V2A015	2	The ESB submission on the proposed material alterations requests an increase in plot ratio in the part of their holding where there are existing structures. These lands are located to the East of the EBS Link Road to Blackthorn Road, and South of the ESB Link to Arena Road (6 year road proposal), (Plot B). In the Manager's Report, March 2011, it was recommended that the plot ratio be reduced on this part of the ESB land holding and reallocated to the part of the land holding that the ESB had indicated a priority for development. The Elected Members agreed this recommendation. The increase in plot ratio now being proposed would result in the potential development of this site increasing by circa 13,000sqm. To date the Draft Plan has been consistent in maintaining the overall level of development within the SUFP area. The ESB's rationale for the increase in plot ratio on this portion of the site differs to the rationale previously submitted. It is considered that it is not appropriate to increase the plot ratio in this case. The Manager acknowledges the arguments set out above by the Senior Planner. However, given the importance of the ESB's role in facilitating major infrastructure development in this County – both in Sandyford and particularly in Ballyogan – he considers that it is reasonable to facilitate the request to increase the plot ratio on this element of the ESB's landholding. As the proposed plot ratio is less than what was proposed in the original draft variation the change is considered to be a minor alteration. Recommendation

Key Issue	Sub. No.	Map No.	Manager's Response & Recommendation
policy and objectives in developing the site.			On lands to the East of the EBS Link Road to Blackthorn Road, and South of the ESB Link to Arena Road (6 year road proposal), lands within the ESB holding (an area of land of circa 2.65ha) the plot ratio of the lands will be increased from 1:0.5 to 1:1.
(ii) The definition of plot size in calculating plot ratio in section 2.5.1, shall be amended to include the lands ceded to the Council (through agreement by CPO) for the purposes of roads schemes.	V2A018		The infrastructure capacity studies undertaken show that Sandyford Business District does not have the capacity to carry additional office based development over and above that which is proposed and catered for by proposed infrastructure interventions. To amend the definition of plot size to include lands reserved for roads schemes and still retain the plot ratio, would increase the amount of floor space available on sites which are subject to roads reservations. This would make provision for a quantum of office based employment floor space over and above the infrastructure capacity. Plot ratio dictates the scale and form of future development. To alter the definition of plot size and retain the plot ratios given on sites subject to roads schemes, would alter the scale and form of future development on that site and render them significantly different from and inconsistent with adjoining sites and their environs.
			Recommendation No change to proposed Material Alterations.
(iii) Definition of plot size in calculating plot ratio and to exclude roads reservations is inequitable - Maple House site South County Business Park lies within a roads reservation. It is inequitable that the density of development on	V2A019		The infrastructure capacity studies undertaken show that Sandyford Business District does not have the capacity to carry additional office based development over and above that which is proposed and catered for by proposed infrastructure interventions. To amend the definition of plot size to include lands reserved for roads schemes and still retain the plot ratio, would increase the amount of floor space available on sites which are subject to roads reservations. This would make provision for a quantum of office based employment floor space over and above the infrastructure capacity. Plot ratio dictates the scale and form of future development. To alter the definition of plot size and retain the plot ratios given on sites subject to roads schemes, would alter the scale and form of future development on that site and render them
this site shall be further reduced by roads proposal.			significantly different from and inconsistent with adjoining sites and their environs.
			Recommendation No change to proposed Material Alterations.

Key Issue	Sub. No.	Map No.	Manager's Response & Recommendation
SECTION 3. URBAN FORM, PUBLIC REALM, LINKAGES AND BUILDING HEIGHT			
3.2 Building Height and Map 3			
Point of Information – Propo The Elected Members considered of site 9 from 6 storeys to 5 sto	d and agreed		t the Council meeting of 11 th April 2011, to reduce the Building Height on part of site 7 from 5 storeys to 4 storeys and on part
(i) Object to the proposed reduction in building height on part of site No. 7 (Former Ulster Bank) in additional to removal of BH3. It is contrary to the Manager's recommendation in the Manager's Report March 2011. A reduction in height from 6-7 storeys to 4-5 storeys will seriously undermine the development potential of the site. Section 3.5 "Design Principles" suggests a substantial set back to facilitate tree planting – this will further increase the distance from Woodford Estate. At a similar distance from Woodford than Site 9 yet site 9 provides for a higher building. Request a building height of 5 storeys with 6 storeys to rear.	V2A014	3	In his report of March 2011, the Manager recommended to remove the star symbol under Objective BH3 which allowed for additional height of 1-2 storeys above the building height limit on site No. 7. This recommendation was made on consideration of submissions made and the concerns raised by the residents of the Woodford Estate and a full assessment made by the Planning Authority. Based on this assessment and given the distance of site No.7 from the Woodford Estate (approximately 35m from the nearest resident) it was considered reasonable to omit the star symbol and provision for additional height under BH3 at this location. At this time, the resulting height limit of 5 storeys was considered appropriate and in accordance with the proper planning and sustainable development of the area. The Manager is consistent in his approach and having regard to the full assessment made at the time of writing of the Manager's Report 2011 it is recommended that the star symbol, under Objective BH3 remains omitted in the interests of protecting residential amenity. Furthermore, the Manager considers that a building height of 5 storeys is appropriate, in particular having regard to the required set back along the western boundary to be provided by the redevelopment of this site. It is therefore recommended to amend the proposed Material Alteration and increase the height on site 7 from 4 storeys to 5 storeys. Recommendation Amend proposed Material Alteration 350-11 on Map 3 as follows: Change Map 3, site No.7 from 4 storeys to 5 storeys.
(ii) Object to the proposed	V2A018	3	In his report of March 2011, the Manager recommended to remove the star symbol under Objective BH3 which allowed for

Key Issue	Sub. No.	Map No.	Manager's Response & Recommendation
reduction in building height on part of site No.9. At least to allow for a corner of the site to retain the option for greater height.			additional height of 1-2 storeys above the building height limit on site No. 9. This recommendation was made on consideration of submissions made and the concerns raised by the residents of the Woodford Estate and a full assessment made by the Planning Authority. Based on this assessment and given the distance of site No.9 from the Woodford Estate (approximately 35m from the nearest resident) it was considered reasonable to omit the star symbol and provision for additional height under BH3 at this location. At this time, the resulting height limit of 6 storeys was considered appropriate and in accordance with the proper planning and sustainable development of the area.
			The Manager is consistent in his approach and having regard to the full assessment made at the time of writing of the Manager's Report 2011 it is recommended that the star symbol, under Objective BH3 remains omitted in the interests of protecting residential amenity. Furthermore, the Manager considers that a building height of 6 storeys is appropriate, in particular having regard to the development set back necessitated by the Luas line to the north of the site. It is therefore recommended to amend the proposed Material Alteration and increase the height on site 9 from 5 storeys to 6 storeys.
		- 1	Recommendation Amend proposed Material Alteration 350-14 on Map 3 as follows:
			Change Map 3, site No.9 from 5 storeys to 6 storeys.
(iii)Welcome proposed V2A020 alterations in height (350-10, 350-11 (site 7), 350-14 (site 9).	V2A020	3	Comment on proposed alteration to Map 3 (350-10 Reservoir House) noted.
			With regards to proposed alterations 350-11 (reduction in height on part of site 7 from 5 to 4 storeys) and 350-14 (reduction in height on part of site 9 from 6 to 5 storeys) the Manager is consistent in his approach. At the time of writing the Manager's Report March 2011 a further assessment of the likely impact of building height on sites 7 and 9 proposed in the Plan on residential amenity, was undertaken. At this time it was considered reasonable to omit the star symbol which allowed for additional height under Objective BH3. The resulting height limit of 5 and 6 storeys respectively was considered appropriate and in accordance with the proper planning and sustainable development of the area. It is therefore recommended to amend
			the proposed Material Alteration and increase the height on sites 7 and 9 to 5 and 6 storeys respectively.
			Recommendation Amend proposed Material Alteration 350-11 on Map 3 as follows:
	200 S	Pre late o	Change Map 3, site No.7 from 4 storeys to 5 storeys.
			Amend proposed Material Alteration 350-14 on Map 3 as follows:
			Change Map 3, site No.9 from 5 storeys to 6 storeys.
(iv) No objection to material alterations in building height	V2A020	3	Noted.
(350-12, 350-13, 350-15, 350-16, 350-17).			Recommendation No change to proposed Material Alterations.

Key Issue	Sub. No.	Map No.	Manager's Response & Recommendation
Objective BH3 and Map 3			
limit by 1-2 storeys" be remove	the Manager ed from site	's Report M s 7 and 9.	on arch 2011 that the star symbol under Objective BH3, which allows for "an element of the building to exceed the building height This was agreed by the Elected Members at the Council Meeting of 11 th April 2011. Also at this meeting, the Elected Members nbols under Objective BH3, at sites 3 and 4.
(i) Welcome the proposed removal of additional height allowance along Blackthorn Avenue and Burton Hall Road (sites, 3, 4, 7 and 9) (350-1, 350-2, 350-3, 350-4).	V2A002 V2A020	3	At the time of writing the Manager's Report March 2011, a further assessment of the likely impact of proposed building heights on sites 3, 4 7 & 9, on residential amenity, was undertaken. At that time the Manager considered it appropriate to recommend the removal of the star symbols which allows for additional height above the building height limit under Objective BH3, on Map 3 at sites 7 & 9 given their distance from the Woodford Estate and the likely negative impact on residential amenity. However, based on this further assessment, it was also recommended by the Manager to retain the star symbols at sites 3 & 4 along Blackthorn Avenue, as it was considered that a building height of 6 storeys with the allowance for an element of the building to be 1-2 storeys higher, would not have a negative impact on the residential amenity of neighbouring properties. It is considered that the additional height allowance at sites 3 & 4 along the street elevation at Blackthorn Avenue would animate the skyline and identify significant routes into SBD. The Manager is consistent in his recommendation and therefore, recommends to amend the proposed Material Alteration and include the star symbols, under Objective BH3, at sites 3 & 4. Recommendation To amend the Proposed Material Alterations 350-1 (site 3) and 350-2 (site 4) as follows: To include the star symbol on Map 3 at sites 3 & 4 under Objective BH3.
(ii) Welcome the alteration to BH3 and removal of star symbol on sites 3 and 4 (350- 1 and 350-2)	V2A021	3	At the time of writing the Manager's Report March 2011, a further assessment of the likely impact of proposed building heights on sites 3, 4 7 & 9, on residential amenity, was undertaken. At that time the Manager considered it appropriate to recommend the removal of the star symbols which allows for additional height above the building height limit under Objective BH3, on Map 3 at sites 7 & 9 given their distance from the Woodford Estate and the likely negative impact on residential amenity. However, based on this further assessment, it was also recommended by the Manager to retain the star symbols at sites 3 & 4 along Blackthorn Avenue, as it was considered that a building height of 6 storeys with the allowance for an element of the building to be 1-2 storeys higher, would not have a negative impact on the residential amenity of neighbouring properties. It is considered that the additional height allowance at sites 3 & 4 along the street elevation at Blackthorn Avenue would animate the skyline and identify significant routes into SBD. The Manager is consistent in his recommendation and therefore, it is recommended to amend the proposed Material Alteration and include the star symbols, under Objective BH3, at sites 3 & 4.
			To include the star symbol on Map 3 at sites 3 & 4 under Objective BH3.

Key Issue	Sub. No.	Map No.	Manager's Response & Recommendation
(iii) Object to the proposed amended wording in BH3 "limited to an element of the building". The original wording of objective BH3 shall be retained to allow for a "significant building", "notably taller than its neighbours" at the Eircom site along Blackthorn Road.	V2A013	3	The Manager does not agree with this submission. Objective BH3 provides for additional height at certain prominent locations within the SUFP, to ensure that the buildings at these locations create a "marker" ie: important entry point in the Business District from the public transport interchange. In order for the design of the building to represent such a "marker" it is considered that height plays an important role. However, in order to achieve its role and to create a necessary punctuation in the skyline, it is not essential for the entire building or collection of buildings on a site to be higher. It is therefore recommended that the proposed Material Alteration to amend the wording in Objective BH3 to "an element of the building at an additional height of 1-2 storeys over the height limit as indicated" be retained. Recommendation No change to proposed Material Alteration.
(iv) Object to proposed amendment to Objective BH3 to remove additional height allowance at Site 7 (former Ulster Bank).	V2A014	3	The Manager does not agree with this submission. At the time of writing the Manager's Report March 2011, a further assessment of the likely impact of proposed building heights on sites 3, 4 7 & 9, on residential amenity, was undertaken. At that time the Manager considered it appropriate to recommend the removal of the star symbols which allows for additional height above the building height limit under Objective BH3, on Map 3 at sites 7 & 9 given their distance from the Woodford Estate and the likely negative impact on residential amenity. The Manager is consistent in his recommendation and therefore, it is recommended that the proposed Material Alteration, to omit the star symbol on site No.7, be retained. Recommendation No change to proposed Material Alteration.
(v) Consequence of removal of additional height under BH3 is that at only 1 location of the 5 locations designated for buildings of "notable design" allows for additional height. A building will lack a strong element of distinction if the height is limited, in particular at locations along Blackthorn Avenue, in the vicinity of permissions with height up to 14 storeys. Therefore, there appears to be little design logic in Map 3, considering the importance of building height in design terms and contrary to the urban design strategy. Urge to rethink this section.	V2A007 V2A012	3	The Manager agrees in principle with the issues raised in this submission and the consequences of removing the star symbols under Objective BH3 at all but one location, on the building height strategy and the rationale behind it. Objective BH3 allowed for certain buildings in prominent locations to act as "markers" which helps to improve legibility for people arriving and moving around Sandyford Business District. At the time of writing the Manager's Report March 2011, a further assessment of the likely impact of proposed building heights on sites 3, 4 7 & 9, on residential amenity, was undertaken. At that time the Manager considered it appropriate to recommend the removal of the star symbols which allows for additional height above the building height limit under Objective BH3, on Map 3 at sites 7 & 9 given their distance from the Woodford Estate and the likely negative impact on residential amenity. However, based on this further assessment, it was also recommended by the Manager to retain the star symbols at sites 3 & 4 along Blackthorn Avenue, as it was considered that a building height of 6 storeys with the allowance for an element of the building to be 1-2 storeys higher, would not have a negative impact on the residential amenity of neighbouring properties. It is considered that the additional height allowance under Objective BH3, at sites 3 & 4 along the street elevation at Blackthorn Avenue, would animate the skyline and identify significant routes into SBD. The Manager is consistent in his recommendation and therefore, recommends to amend the proposed Material Alteration and include the star symbols, under Objective BH3, at sites 3 & 4.

Key Issue	Sub. No.	Map No.	Manager's Response & Recommendation
			To include the star symbol on Map 3 at sites 3 & 4 under Objective BH3.
(vi) Opposed to removal of star symbol under BH3 on site no.3 (Siemens Site), Blackthorn Avenue. This site is at a prominent location and requires buildings that mark their location, in particular adjacent to sites with permission for 10-14storeys.	V2A012	3	The Manager agrees with the issues raised in this submission. At the time of writing the Manager's Report March 2011, a further assessment of the likely impact of proposed building heights on sites 3, 4 7 & 9, on residential amenity, was undertaken. At that time the Manager considered it appropriate to recommend the removal of the star symbols which allows for additional height above the building height limit under Objective BH3, on Map 3 at sites 7 & 9 given their distance from the Woodford Estate and the likely negative impact on residential amenity. However, based on this further assessment, it was also recommended by the Manager to retain the star symbols at sites 3 & 4 along Blackthorn Avenue, as it was considered that a building height of 6 storeys with the allowance for an element of the building to be 1-2 storeys higher, would not have a negative impact on the residential amenity of neighbouring properties. It is considered that the additional height allowance under Objective BH3, at sites 3 & 4 along the street elevation at Blackthorn Avenue, would animate the skyline and identify significant routes into SBD. The Manager is consistent in his recommendation and therefore, recommends to amend the proposed Material Alteration and include the star symbols, under Objective BH3, at sites 3 & 4. Recommendation To amend the Proposed Material Alterations 350-1 (site 3) and 350-2 (site 4) as follows: To include the star symbol on Map 3 at sites 3 & 4 under Objective BH3.
(vii) Object to the removal of the Star symbol under Objective BH3 on site no.9 (the FAAC site). Request to reinstate star symbol "allowing for additional height on the site where it does not have significant adverse impact on adjacent residential properties" or that "no development on this site will be rejected for reasons of height alone".	V2A018	3	The Manager does not agree with this submission. At the time of writing the Manager's Report March 2011, a further assessment of the likely impact of proposed building heights on sites 3, 4 7 & 9, on residential amenity, was undertaken. At that time the Manager considered it appropriate to recommend the removal of the star symbols which allows for additional height above the building height limit under Objective BH3, on Map 3 at sites 7 & 9 given their distance from the Woodford Estate and the likely negative impact on residential amenity. The Manager is consistent in his recommendation and therefore, it is recommended that the proposed Material Alteration, to omit the star symbol on site No.9, be retained. Recommendation No change to proposed Material Alteration.
Objective BH4 and Map 3			
(i) Welcome the addition of BH4 along Blackthorn Avenue and Burton Hall Road (sites 3,4,7 and 9) (350-5, 350-6, 350-7, 350-8 350-9).		3	Noted. Recommendation No change to proposed Material Alteration.

Key IssueSub.MapManager's ResNo.No.No.		-	Manager's Response & Recommendation
(ii) Welcome the addition of BH4 on sites 3, 4, (350-5, 350-6).	V2A021	3	Noted. Recommendation No change to proposed Material Alteration.
(iii) Objective BH4 - should allow for input from local residents into the concept of 'notable design' during the early stages of the planning process.	V2A002 V2A020	3	The Manager does not agree with this submission. The statutory planning process allows for public consultation at the planning application stage. There is not a statutory basis allowing stakeholders and local residents to have any intervention in the design of a building prior to the statutory planning application stage. Recommendation No change to proposed Material Alteration.
(iv) Additional imposition on site 7 is BH4. All other sites which are identified for Objective BH4 are 6 storeys.	V2A014	3	The Manager does not agree with this submission. Objective BH4 should not be considered as an imposition. BH4 ensures that the building design celebrates the site's prominent location. The site is located in close proximity to the Sandyford Luas Stop. The redevelopment of the site will include a green route from the Luas stop into SBD with the opening up of the site into a pocket park. The building shall be of notable design to reflect its important position. It is therefore recommended to retain Objective BH4 at this location. Recommendation No change to proposed Material Alteration.

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Key Issue	Sub. No.	Map No.		
SECTION 4. INFRASTRUCTURE				
General				
(i) Inclusion of the Material Alterations relating to roads infrastructure, car parking and mobility management addresses the concerns of the NTA.	V2A005 (NTA)		Noted. Recommendation No change to proposed Material Alteration.	
Section 4.2 Multi Modal Transport Infrastructure				
TAM6 Cycling and Walking				
(i) Welcome the proposed alteration to TAM6.	V2A020		Noted. Recommendation No change to proposed Material Alteration.	
TAM9 Mobility Management Planning				
(i) There remains no clear details of the framework, scale, form of engagement, scope or delivery of the Area Wide Mobility Management Plan.	V2A008 (NRA)		The Manager does not agree with this submission. The Area Wide Mobility Management Plan for the Sandyford Business District will be introduced after the finalisation of the SUFP following consultation with the NTA and Stakeholders in the area. The Walking and Cycling Strategy, the Public Transport Strategy and Mobility Management Plan will be delivered before or in tandem with the Roads Strategy as clearly stated in the revised Phasing objective P10. Recommendation No change to proposed Material Alterations.	
TAM 18 Parking				
(i) Ambiguity in the wording "maximum car parking standards". What does this mean – should the relevant section in the CDP be referenced for clarity purposes?	V2A007		The County Development Plan Parking Standards appear in Section 16.10.6 "Car Parking Standards" in the CDP 2010-2010 where it clearly states "Car parking standards provide a guide on the number of required off street car parking space acceptable for new development". These are provided in table nos. 16.3 and 16.4. The Manager considers it appropriate, in the interests of clarity, to refer to the relevant section of the CDP. Recommendation To amend text in Objective TAM18 proposed Material Alteration as follows:	

Key Issue	Sub. No.	Map No.	Manager's Response & Recommendation
			"It is an objective of the Council that the maximum car parking standards for the entire Sandyford Business District will not exceed the Dún Laoghaire-Rathdown County Development Plan 2010-2016 car parking standards, identified in Section 16.10.6, for designated areas along public transport corridors and more restrictive standards may apply at appropriate locations".
Section 4.3 Community Infrastructure			
4.3.1 Policy SUFP 8 OS5 Green Infrastructure/ Open Space			
(i) Welcome the proposed alteration to Objective OS5.	V2A020		Noted. Recommendation No change to proposed Material Alteration.

Key Issue	Sub. No.	Map No.	Manager's Response & Recommendation	
	140.		· · · · · · · · · · · · · · · · · · ·	
SECTION 5. PHASING AND FUNDING				
Phasing Objective P3 & P4				
(i) Regarding the Roads Scheme, the NRA welcome that consultation and review will be carried out with the National Transport Authority based on their adopted Transport Strategy for the Greater Dublin Area under Phasing Objectives P3, and P4.	V2A008 (NRA)		Noted. Recommendation No change to proposed Material Alterations.	
Phasing Objective P10		1		
(i) Welcome the inclusion of Objective P10 – demonstrates commitment to public transport, Walking and Cycling and Mobility Management.	V2A011		Noted. Recommendation No change to proposed Material Alteration.	
(ii) Although the inclusion of Objective P10 is noted and welcomed, the Draft Framework Plan still does not specify phasing of development quanta tied to delivery of sustainable transport modes. This is in marked contrast to roads objectives indicated clearly in Objectives under TAM 19 and 20 and phasing arrangements under P3 and P4.	V2A008 (NRA)		The Manager does not agree with this submission. The Walking and Cycling Strategy, the Public Transport Strategy and Mobility Management Plan will be delivered before or in tandem with the Roads Strategy as clearly stated in the revised Phasing Objective P10. "It is an objective of the Council that satisfactory progress should be made with the implementation of the Public Transport, Walking & Cycling and Mobility Management Planning Objectives <u>in tandem with</u> phasing objectives P2, P3 and P4". It should also be noted that the phasing of development is subject to planning permissions and not the delivery of the schemes. Recommendation No change to proposed Material Alteration.	

Key Issue	Sub. No.	Map No.	Manager's Response & Recommendation	
APPENDIX 2. SPECIFIC LOCAL OBJECTIVES				
SL0116				
(i) No objection to proposed alterations to SLO116.	V2A020	1	Noted. Recommendation No change to proposed Material Alteration.	
SLO123 Office Based Employment South County Business Park				
(i) Cannot understand the logic for SL0123. If lands are to be considered for office based employment, then why not simply change the zoning from Residential to Office. Why was this SLO considered, when there is enough office use elsewhere?	V2A007	1	The Manager is cognisant of the role of the IDA in attracting internationally trading businesses and the lease arrangements over the land but also recognises the benefits that residential development could bring the site and its environs. These lands are adjacent to the Leopardstown Park Hospital, the Luas stop at Central Park and the core area at Central Park. The location provides an appropriate residential environment while having the added benefit of providing activity for those going to and from the Luas to the businesses located in South County Business Park. Having considered the submission to the Proposed Variation in March 2011 and having regard to ER10 of the Regional Planning Guidelines for the Greater Dublin Area, the Manager recommended a change to the SUFP by way of additional Specific Local Objective SL0123. This Specific Local Objective would facilitate office based employment within the Residential development is considered by the IDA in order to create activity in this area on what is a very important pedestrian route to Central Park Luas stop. The Manager is consistent in his recommendation and therefore, recommends to retain SL0123.	
(ii) Object in principle to proposed SLO123 and request an amendment to the wording – to omit "to facilitate the IDA in attracting internationally trading business" as it is superfluous and could possibly be redundant on site Maple	V2A019	1	The reason for the inclusion of SLO123 was to have regard to the case made by the IDA, as set out in their submission during the first public display period, for the Plan to facilitate the nature of the use that they want to be developed in South County Business Park. If the IDA no longer have an interest in the land, then the Planning Department consider residential use to be more appropriate. The Manager does not recommend the alteration to the wording of SLO123 by omitting "to facilitate the IDA in attracting internationally trading business" as this would be comparable to rezoning the land Objective "OE" Office Based Employment. Rezoning the land at this stage in the process would be a material alteration to the Plan and outside the provisions of Section 13 (6) (c) of the Planning and Development Act 2000-2010.	

Key Issue	Sub. No.	Map No.	Manager's Response & Recommendation			
House, South County Business Park.			No change to proposed Material Alteration.			
(iii) Welcome the inclusion of SLO123.	V2A011 V2A016 V2A020		Noted. Recommendation No change to proposed Material Alteration.			

Submissions not relevant or no comm	Submissions not relevant or no comment to proposed Material Alterations						
Key Issue	Sub. No.	Map No.					
(i) SLO 118 Pedestrian Cycle link Harcourt Street line.	V2A003	Map 1					
(ii) Department of Communications, Energy and Natural Resources have no comment/observations.	V2A001, V2A017						
(iii) Department of Education and Skills have no further submission.	V2A006						
(iv) Population Human Health, Noise Pollution, Air Quality, Rodent Measures.	V2A010						
(v) To reconsider the Plot Ratio at the former Siemens Site, Blackthorn Avenue.	V2A012	Map 2					
(vi) No observations from Dublin Aviation Authority.	Late submission						

<u> PART 3</u>

SUMMARY OF SUBMISSIONS IN RELATION TO STRATEGIC ENVIRONMENTAL ASSESSMENT AND APPROPRIATE ASSESSMENT

Addendum III

TO THE SEA ENVIRONMENTAL REPORT & APPROPRIATE ASSESSMENT

OF THE PROPOSED VARIATION NO. 2 TO THE DÚN LAOGHAIRE-RATHDOWN CDP

RESPONSE TO RELEVANT SUBMISSIONS MADE ON PROPOSED MATERIAL ALTERATIONS AND ADDENDUM II

For:

Dún Laoghaire-Rathdown County Council

County Hall

Marine Road

Dún Laoghaire



By:

CAAS Ltd.

2nd Floor, The Courtyard 25 Great Strand Street Dublin 1



JUNE 2011

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1 Introduction

This is the third addendum to the Strategic Environmental Assessment (SEA) Environmental Report and Draft Appropriate Assessment (AA) Screening Report for Proposed Variation No. 2 to the Dún Laoghaire-Rathdown CDP.

This Addendum provides responses to relevant submissions or parts of relevant submissions which relate to the SEA Environmental Report and AA and were made on Proposed Material Alterations to the Proposed Variation and Addendum II¹.

This Addendum forms part of the documentation of the ongoing SEA, AA and Variation-making processes. It supplements and should be read in conjunction with the original SEA Environmental Report and Draft AA, Addendum I^2 and Addendum II.

Any further modifications to the Proposed Variation will be evaluated for their environmental consequences in advance of making the Variation.

CAAS Ltd. for Dún Laoghaire-Rathdown County Council

¹ Addendum II details the environmental consequences of the Proposed Material Alterations (and was included in the Proposed Material Alterations document which was placed on public display in May 2011)

² Addendum I details responses to the submissions on the SEA Environmental Report and Draft AA which were made during the first period of public display of the Proposed Variation, SEA Environmental Report and Draft AA (and was included in the Manager's Report on submissions and observations which was submitted to the Elected Members in March 2011). It proposes updates to the SEA Environmental Report and Draft AA as a result of these submissions, as appropriate.

2 Responses to Submissions

Note that only submissions or parts of submissions that are relevant to the SEA ER and/or AA are considered in this document.

2.1 Submission No. V2A004: Environmental Protection Agency

2.1.1 SEA Determination

Your position with regard to the need for Strategic Environmental Assessment (SEA) of the Proposed Amendments is noted.

Response:

Noted.

Updates to ER or AA Arising:

None.

2.1.2 Specific Comments on the Proposed Material Alterations

A number of specific comments in relation to the proposed material alterations are set out below. In particular you are referred to the following proposed amendments:

a) Section 2 Future Land Uses

The Agency notes the new subsection 2.3.9 Unfinished Estates and accompanying new Objective DS 5, to ensure that unfinished estates within the Sandyford Business District are appropriately resolved.

b) Section 4 Infrastructure

The amendment of Objective TAM 9 to refer to the National Transport Authority is acknowledged. There would also be merits in also referring to the Greater Dublin Area Draft Transport Strategy specifically, which should be considered for all transport related infrastructure within the Plan area.

c) Section 5 Phasing and Funding

The Agency welcomes the inclusion of the reference to the National Transport Authority's Greater Dublin Area Draft Transport Strategy.

d) Appendix 2 Specific Local Objectives

The inclusion of new Objective 123 is noted, however it should be noted that if the proposed Master Plan to be prepared under this objective involves the development or zoning of lands, you are referred to the requirements of the SEA and Habitats Directives which should be taken into consideration as appropriate.

Response:

- a) Noted.
- b) Such reference would not change the findings of the SEA or AA.
- c) Noted.
- d) Noted.

Updates to ER or AA Arising:

None.

2.1.3 Obligations with respect to National Plans and Policies and EU Environmental Legislation

You are referred to your responsibilities and obligations in accordance with all national and EU environmental legislation. It is a matter for Dun Laoghaire Rathdown County Council to ensure that, when undertaking and fulfilling their statutory responsibilities; they are at all times compliant with the requirements of national and EU environmental legislation.

Response:

Noted.

Updates to ER or AA Arising:

None.

2.1.4 SEA Statement

You are also referred to the requirement to prepare an SEA Statement outlining "Information on the Decision" as required under by SEA Regulations. This should summarise the following:

- How environmental considerations have been integrated into the Plan;
- How the environmental report, submissions, observations and consultations have been taken into account during the preparation of the Plan;
- The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and,
- The measures decided upon to monitor the significant environmental effects of implementation of the Plan.

A copy of the SEA Statement with the above information should be sent to any Environmental Authority consulted during the SEA process.

Response:

An SEA Statement containing the required information will be prepared on adoption of the Proposed Variation and sent to the relevant authorities.

Updates to ER or AA Arising:

None.

2.2 Submission No. V2A020: Stillorgan District, Community and Residents Alliance

2.2.1 Requests for Amendments

Requests for amendments made in this submission would not change the findings of the SEA or AA.

2.2.2 Part 4: Strategic Environmental Assessment

- a) In general, it is reasonable to conclude that the proposed alterations 'would not be likely to have significant environmental effects' as stated for several of the modified objectives.
- b) The environmental assessment of Proposed Material Alterations makes occasional references to the need to be mindful of the adverse effects of air pollution on human health e.g. re 2.5 Density and Scale Policies and Objectives, DS5, that unfinished estates in SBD are appropriately resolved, it is stated that this will encourage more sustainable transport, reduce greenhouse gases and contribute towards protecting human health with regard to air quality and noise. There are similar statements re greenhouse gases and human health in relation to 'Objectives Building Heights', 'Objectives Way Finding' and 'Objective Cycling and Walking', 'Objective Parking' and 'Objectives Phasing'.
- c) Unfortunately, as outlined in our response to the first Draft Framework Plan and associated SEA, important gaps in the draft SEA have not been addressed. There has been no objective, data-based assessment of air quality in the area included in the Framework Plan. The absence of baseline data on air quality in the SEA is analogous to drawing up a debt management plan without any financial calculations! Plans to reduce the debt, implement savings etc would be meaningless unless there was some estimate of the scale of indebtedness. In addition to there being no baseline data, there is no stated intention to carry out such a baseline assessment or to develop an ongoing monitoring programme. In the absence of baseline data, EISs for future development in the area will be produced in a vacuum. This has been a serious deficiency in assessing the environmental impact of large scale developments in the County since 2004. Each EIS concludes that the incremental impact will be minimal. Such EISs will remain meaningless until they are set in the context of satisfactory data on the receiving environment.
- d) In summary, the proposed material alterations are unlikely to have adverse effects on the environment.
- e) It is unfortunate that the otherwise positive approach towards sustainable development in Sandyford has not included any attempt to quantify or estimate baseline air quality in the area.

Response:

- a) Noted.
- b) Noted.
- c) As stated in Addendum I to the SEA Environmental Report and AA:

In compliance with the SEA Directive and in order to describe the baseline (the current state of the environment) at Sandyford, data was collated from currently available, relevant environmental sources. In compliance with the European principle of subsidiarity, primary data collection will be undertaken by lower tier environmental assessments as relevant and appropriate. The most recent datasets are used by the assessment and limitations are noted.

With regard to air quality, in compliance with the European principle of subsidiarity, primary data collection will be undertaken by lower tier environmental assessments as relevant and appropriate. Sections 7 and 8 of the SEA Environmental Report include an assessment of the likely significant environmental effects of the provisions of the Proposed Variation, including those on air quality.

d) Noted.

e) See response under c) above.

Updates to ER or AA Arising:

None.

<u>PART 4</u>

LIST OF SUBMISSIONS

21 submissions to the proposed Material Alterations to proposed Variation No.2 to the County Development Plan 2010-2016 were received during the 4 week public consultation period 13th May to 13th June 2011.

Each submission has its own individual reference number e.g. V2A001.

(i) Alphabetical Order of persons or bodies who made submissions

REF No	Name/Company	Organisation	Site Location	Торіс
V2A003	Dennison Andrew		Leopardstown Lawn	PedestrianLink/Cycleway Harcourt Street Railway Line
V2A018	Higgins Paul	Brackville Holdings Ltd	FAAC Site Burton Hall Road	Building Height - BH3 & BH4, Plot ratio definition
V2A012	Sadler Trevor McGill Planning Ltd on behalf of	CWWB Partnership	Former Siemens Site Corner Ballymoss Rd/Blackthorn	Building Height - BH3, Plot Ratio Siemens Site
V2A006	Connolly Clare	Department of Education and Skills	General	No Comment
V2A001	Conaty Carmel	Dept of Communications, Energy & Natural Resources	General	No comment
V2A017	Conaty Carmel	Dept of Communications, Energy & Natural Resources	General	No comment
V2A013	Strong Jean Jean Strong on behalf of	Eircom Ltd	Blackthorn Road	Building Height - BH3 & BH4
V2A004	O'Mahony Cian	Environmental Protection Agency	General	Unfinished Estates, TAM9, Objective 123, SEA Statement
V2A015	Crowley Gerard	ESB	Leopardstown Road	Increase plot ratio
V2A010	Cronin Dora	HSE		Material Alteration, Noise/Air Pollution
V2A016	Brogan Jim Jim Brogan on behalf of	IDA Ireland Ltd	General	Specific Local Objective 123, Welcomes Land use Zoning 'F' to 'OE'
V2A019	Lyons Emma Auveen Byrne & Associates on behalf of	John Maybury	Site South Co Business Park adj Central Park Luas	Specific Local Objective 123, Definition of plot ratio calculation, Open Space provision & calculation
V2A002	Dineen Sean	Lakelands Residents Association	General	Building Height, Design, Remove 2011-2016 from Title
V2A008	Spain Tara	National Roads Authority	General	Transport Infrastructure, TAM9, Phasing P3, P4, P10
V2A005	O'Donovan Conor	National Transport Authority	General	SUFP aligns with draft Transport Strategy
V2A011	King David	Railway Procurement	Central Park/General	Appendix 2: Specific Local Objective 123 Phasing, P10

REF No	Name/Company	Organisation	Site Location	Торіс
		Agency		welcomed
V2A014	Quaile Darran Simon Clear Planning & Development Consultants on behalf of	Sandyford Forum Developments Ltd	Blackthorn Avenue	Building Height - BH3 & BH4
V2A007	Rowe David	South Co Dublin Assocation of An Taisce	General	OBuilding Height BH3, Transport Infrastructure TAM18, Specific Local Objectives 1,2 3 App.2
V2A020	Turner M L	Stillorgan District Community & Res Alliance	General	Various inc: Statutory Timeframe, Unfinished Housing Estates Section 2.3.9, Building Heights BH3, BH4, TAM 6, SUFP 8, Maps 1,2,3
V2A009	Gilligan Gerry	Stillorgan Heath Residents Association	Stillorgan Heath	Section 2.3.9 Uninished Housing Estates
V2A021	Peregrine Edward	Stillorgan Wood Residents Association	General	Unfinished Housing Estates Section 2.3.9, Building Height BH3, BH4, Map 3 Building Height

(ii) Numerical list of persons or bodies who made submissions

REF No	Name/Company	Organisation	Site Location	Topic
V2A001	Conaty Carmel	Dept of Communications, Energy & Natural Resources	General	No comment
V2A002	Dineen Sean	Lakelands Residents Association	General	Building Height, Design, Remove 2011-2016 from Title
V2A003	Dennison Andrew		Leopardstown Lawn	PedestrianLink/Cycleway Harcourt Street Railway Line
V2A004	O'Mahony Cian	Environmental Protection Agency	General	Unfinished Estates, TAM9, Objective 123, SEA Statement
V2A005	O'Donovan Conor	National Transport Authority	General	SUFP aligns with draft Transport Strategy
V2A006	Connoliy Clare	Department of Education and Skills	General	No Comment
V2A007	Rowe David	South Co Dublin Assocation of An Taisce	General	OBuilding Height BH3, Transport Infrastructure TAM18, Specific Local Objectives 1,2 3 App.2
V2A008	Spain Tara	National Roads Authority	General	Transport Infrastructure, TAM9, Phasing P3, P4, P10
V2A009	Gilligan Gerry	Stillorgan Heath Residents Association	Stillorgan Heath	Section 2.3.9 Uninished Housing Estates
V2A010	Cronin Dora	HSE		Material Alteration, Noise/Air Pollution
V2A011	King David	Railway Procurement Agency	Central Park/General	Appendix 2: Specific Local Objective 123 Phasing, P10 welcomed
V2A012	Sadler Trevor McGill Planning Ltd on behalf of	CWWB Partnership	Former Siemens Site Corner Ballymoss Rd/Blackthorn	Building Height - BH3, Plot Ratio Siemens Site
V2A013	Strong Jean Jean Strong on behalf of	Eircom Ltd	Blackthorn Road	Building Height - BH3 & BH4
V2A014	Quaile Darran Simon Clear Planning & Development Consultants on behalf of	Sandyford Forum Developments Ltd	Blackthorn Avenue	Building Height - BH3 & BH4
V2A015	Crowley Gerard	ESB	Leopardstown Road	Increase plot ratio
V2A016	Brogan Jim Jim Brogan on behalf of	IDA Ireland Ltd	General	Specific Local Objective 123, Welcomes Land use Zoning 'F' to 'OE'
V2A017	Conaty Carmel	Dept of Communications,	General	No comment

REF No	Name/Company	Organisation	Site Location	Topic
		Energy & Natural Resources		
V2A018	Higgins Paul	Brackville Holdings Ltd	FAAC Site Burton Hall Road	Building Height - BH3 & BH4, Plot ratio definition
V2A019	Lyons Emma Auveen Byrne & Associates on behalf of	John Maybury	Site South Co Business Park adj Central Park Luas	Specific Local Objective 123, Definition of plot ratio calculation, Open Space provision & calculation
V2A020	Turner M L	Stillorgan District Community & Res Alliance	General	Various inc: Statutory Timeframe, Unfinished Housing Estates Section 2.3.9, Building Heights BH3, BH4, TAM 6, SUFP 8, Maps 1,2,3
V2A021	Peregrine Edward	Stillorgan Wood Residents Association	General	Unfinished Housing Estates Section 2.3.9, Building Height BH3, BH4, Map 3 Building Height

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