



# Chief Executive's Report on Draft Plan Consultation

July 2021

**Volume I**



**Draft County Development Plan 2022-2028**

**Chief Executive's Report on Draft Plan Consultation**

**July 2021**

**Volume I**

**Issues Raised and Chief Executive's Response & Recommendations**



## Contents

Contents .....	3
Part 1: Introduction to Chief Executive’s Report.....	5
Part 2: Summary of the Observations, Submissions and Recommendations of the Office of the Planning Regulator and the Issues Raised and Recommendation of the Eastern Midlands Regional Authority and the National Transport Authority and Executive’s Response and Recommendations.....	13
2.1: Summary of the Observations, Submissions and Recommendations of the Office of the Planning Regulator.....	15
2.2 Summary of the Issues Raised and Recommendation of the Eastern Midlands Regional Authority (EMRA) .....	98
2.3 Summary of the Issues Raised and Recommendation of the National Transport Authority .....	114
Part 3: Executive’s Response to the Issues raised in the submissions and observations by Other Persons.....	120
3.1: Chapter 1 - Introduction Vision and Context.....	122
3.2: Chapter 2 - Core Strategy .....	128
3.3: Chapter 3 - Climate Action .....	162
3.4: Chapter 4 - Neighbourhood – People, Homes and Place .....	186
3.5: Chapter 5 - Transport and Mobility .....	260
3.6: Chapter 6 - Enterprise and Employment.....	324
3.7: Chapter 7 - Towns, Villages and Retail Development .....	346
3.8: Chapter 8 - Green Infrastructure and Biodiversity .....	376
3.9: Chapter 9 - Open Space, Parks and Recreation.....	412
3.10: Chapter 10 - Environmental Infrastructure and Flood Risk.....	444
3.11: Chapter 11- Heritage and Conservation.....	462
3.12: Chapter 12- Development Management .....	476
3.13: Chapter 13 - Land Use Zoning .....	528

3.14: Chapter 14 - Specific Local Objectives.....	550
3.15: Chapter 15 - Implementation, Monitoring and Evaluation.....	588
3.16: Appendix 1 - Tiered Approach to Land Zoning – Infrastructure Assessment.....	598
3.17: Appendix 2 - Draft Housing Strategy and Interim HNDA .....	602
3.18: Appendix 3 - Development Management Thresholds (2022 -2028).....	622
3.19: Appendix 4 - Heritage Lists.....	624
3.20: Appendix 5 - Building Heights Strategy (see also section 3.29 Appendix 17 SUFP) .....	690
3.21: Appendix 7 Sustainable Drainage System Measures .....	700
3.22: Appendix 8 - Interim Dún Laoghaire Urban Framework Plan .....	706
3.23: Appendix 9 - Landscape Assessment Study and Landscape/Seascape Character Areas .....	736
3.24: Appendix 10 - Ecological Network.....	738
3.25: Appendix 11 - Wind Energy Strategy.....	740
3.26: Appendix 12 - Public Rights of Way/Recreational Access Routes .....	744
3.27: Appendix 15 - Green Infrastructure Strategy .....	756
3.28: Appendix 16 - Strategic Flood Risk Assessment 2022-2028.....	758
3.29: Appendix 17 - Sandyford Urban Framework Plan (see also section 3.20 Appendix 5: Building Height Strategy) .....	794
3.30: Strategic Environmental Assessment and Appropriate Assessment .....	812
3.31: Land Use Mapping.....	818
3.32: Miscellaneous.....	906
Part 4: Appendices to Chief Executive’s Report .....	924
4.1: Appendix 1 - Chief Executive’s Draft Plan Errata.....	926
4.2: Appendix 2: Acronyms.....	928
4.3: Appendix 3: Legislative Background.....	930

## Part 1: Introduction to Chief Executive's Report

### 1.1 Overview

Dun Laoghaire Rathdown County Council are at an advanced stage in the process of reviewing and preparing a new County Development Plan for the period 2022 – 2028.

The process of reviewing the 2016-2022 County Development Plan and preparation of the new Plan formally commenced back in January 2020 with an eight-week Pre-Draft public consultation phase. A 'Have your Say' public consultation document was prepared and widely circulated, and six open days were held, one in each Electoral Ward in the County. Submissions were invited, and the Executive prepared a Chief Executive's Report summarising these submissions and making recommendations on what should be contained in the Draft Plan. A special Council meeting was held with the Elected Members of the Council and a number of Directions were issued requesting strategic matters to be addressed in the Draft Plan.

A Chief Executive's Draft Plan was then prepared and circulated to the elected members in October 2020. This was considered and amended by the elected Members at a series of Special County Development Plan meetings. At a meeting held on the 18th December it was deemed to be the Draft Plan.

This Draft Plan was then placed on virtual display for a period of over 13 weeks commencing with the virtual display room on the 12<sup>th</sup> January to 16<sup>th</sup> April 2021. The physical display commenced in early February and ran for 11 weeks until 16<sup>th</sup> April.

The various restrictions in place arising from the COVID-19 pandemic created some challenges in terms of the display, however all statutory requirements were met (See section 1.4 below for full details of Draft Plan Consultation process). The use of the virtual room was positively received.

A total of 1263 submissions were received and overall the level of engagement was high and included much positive commentary. The number of submissions received was high being an increase of over 70% on the number received at the

same stage in the preparation of the 2016 – 2022 Plan. In a similar vein to the submissions received at pre-draft stage it is clear that the community care strongly about what happens in the County. Whilst many of the issues raised related to the Draft County Development Plan, there were also a high number of issues raised that related to other operational areas or matters more appropriate to Local Area Plans or other service area Plans.

We wish to take the opportunity to thank all those who made submissions, all who visited the virtual room and all those who viewed the Plan in the Ferry Terminal. We also wish to thank all the elected members who also supported and encouraged participation.

### 1.2 Format of Report

The legislation requires that a full summary of all submissions is provided as well as the Chief Executive's Response to the issues raised in submissions. Therefore, the Chief Executive's Report comprises 2 volumes, Volume 1, which covers the responses to the issues raised and Volume 2 which summarises all submissions (excluding the submission of the Office of the Planning Regulator the summary of which is contained in Volume 1).

#### In volume 1:

**Where an issue raised is not considered a County Development Plan issue this is stated in the response in blue text.**

**Recommendations for amendments to the Draft Plan are shown by way of red text with deletions shown by way of a ~~strike-through~~ and additions shown by way of underlining.**

**Responses in black are matters considered by the Chief Executive and where no change is recommended.**

*In both volumes the submissions are hyperlinked allowing anyone access to the full detail of any individual submission.*

The report is set out in the order in which the issues arise in the Draft County Development Plan.

**Volume 1 - Issues Raised and Chief Executive's Response & Recommendations:****Part 1: Introduction to Chief Executive's Report**

- Overview
- Format of report
- Legislative Background
- Outline of Draft Plan Consultation Process
- Challenges created by Covid 19
- High level overview of nature of issues raised and recommendations

**Part 2: Summary of the submissions from the Office of the Planning Regulator (OPR), the National Transport Authority (NTA) and the Eastern Midland Regional Authority and the Chief Executive's response and recommendation.**

- A summary of the observations, submissions and recommendations made by the Office of the Planning Regulator.
- A Summary of the issues raised, and the recommendations made by the NTA.
- A summary of the issues raised, and the recommendations made by the Eastern and Midlands Regional Authority (EMRA).
- The response of the chief executive to the issues raised, taking account of any directions of the members of the authority, 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 of the Government or of any Minister of the Government and, if appropriate, any observations made by the Minister for Arts, Heritage, Gaeltacht and the Islands.

**Part 3: Summary of the Issues raised by other persons and the response and recommendations of the Chief Executive**

- A summary of the issues raised broken down by way of reference to the chapters and appendices of the Draft Plan
- The Executive's response and any recommendations

**Part 4: Appendices to the Chief Executive's Report**

There are 3 appendices as follows:

- Appendix 1. Draft Plan Errata
- Appendix 2. Acronyms
- Appendix 3. Legislative Background

**Volume 2 - Summary of all submissions**

**This report along with the Draft Plan is submitted to the elected members of Dun Laoghaire-Rathdown County Council for their consideration.**

**1.3 Draft Consultation Process**

The Draft Plan was on public display online from January 12<sup>th</sup>, 2021 to April 16<sup>th</sup> inclusive. The Draft Plan was also available to view from Monday 1st February 2021 to Friday 16th April 2020, in the Ferry Terminal, Dún Laoghaire Harbour, strictly by appointment only.

The Council utilised a number of innovative means of communicating the messages contained in the Draft Plan including the following;

- Development of a virtual room which displayed the Draft County Plan virtually but in a real location in the County (Dalkey Heritage Centre) This was the first time such a display approach has been used for a Draft County Development Plan. The Virtual Room webpage had a total of 4280 visits during the display period, which was substantially greater than the number who visited the Plan in person in previous years.
- Production of a 5 minute video where the Cathaoirleach also invited people to make submissions, and 2 members of the County Development Plan team gave a brief outline of what a Development Plan is and also outline the key messages in the Draft Plan.
- Use of numerous social media platforms to circulate the video and the link to the virtual room and public consultation hub – YouTube, Facebook, twitter, Instagram.
- Dedicated email and phone number.
- Development of FAQs relating to current CDP review stage. These FAQs were available online.
- Production of a dedicated dlr times newspaper which was circulated to all households in the County.

- The Draft Plan was on display by appointment in the Ferry Terminal during level 5 restrictions. The online display commenced on January 12<sup>th</sup> with the physical display commencing on the 1<sup>st</sup> February. The public therefore had a longer period of 13 weeks as opposed to 10 weeks in which to make a submission.
- Children's Art competition to design covers for 2 chapters.
- Weekly sound bites were issued on specific issues contained in the Draft Plan via social media.
- Individual brochures were delivered to all properties in the 5 proposed new Architectural Conservation Areas.

#### **1.4 Addressing Challenges**

As set out above public health restrictions were in place during the display period which created some challenges. However, the Draft County Development Plan Virtual Public Consultation was an innovative 3D virtual room set up to allow the public to interact with and make submissions to the DLR Draft County Development Plan 2022 -2028.

The aim was to provide a comprehensive and interactive space capable of hosting the entire Draft County Development Plan, allowing members of the community to view the Plan in detail from their own home. The Virtual room provided an opportunity for individuals who could not view the plan in person due to Covid restrictions, to view the entire Plan in an as informative and interactive manner to what would be provided in a physical display.

**1.5 Overview of nature of Main Issues raised and recommendations made**  
**(Note: This is high level and does not purport to show every amendment proposed. The report should be read in full).**

Section	Main Issues Raised	Main Recommended Amendments
<b>Office of the Planning Regulator</b>	9 Recommendations on; <ul style="list-style-type: none"> <li>• Core Strategy</li> <li>• Residential land supply</li> <li>• Prioritisation of preferable locations</li> <li>• O/0 Zoning</li> <li>• Tiered Approach to Zoning</li> <li>• Retail hierarchy</li> <li>• Sustainable transport and modal shift</li> <li>• Strategic transport infrastructure capacity</li> <li>• Flood risk management</li> </ul> 2 Observations on; <ul style="list-style-type: none"> <li>• Retail Strategy</li> <li>• Climate Action</li> </ul>	<ul style="list-style-type: none"> <li>• Amendment of calculation of population for the plan - Table 2.5 in the Core Strategy to reflect the plan period up to Q1 2028 only, and not incorporate the full year 2028.</li> <li>• Amendments to reflect the new Housing Supply Target methodology in the Draft Plan- tables 2.7 and 2.8</li> <li>• Omit O/0 zone and include new SLO</li> <li>• New Retail Policy Objective to commence a broad assessment of retail floor space to inform the next Regional Retail Strategy</li> <li>• Inclusion of a modal share target.</li> <li>• Inclusion of a new SLO to prepare an Area Based Transport Plan (ABTA) for the Racecourse South lands</li> <li>• Amend Policy Objective CA1: National Climate Action Policy</li> <li>• Change of zoning at Rathmichael from A to A1 (development in accordance with approved Local Area Plan)</li> </ul>
<b>Eastern and Midland Regional Authority</b>	Considers Plan provides a robust framework for the development of an overall strategy for the proper planning and sustainable development of the County Recommendations on; <ul style="list-style-type: none"> <li>• Engagement with the transport agencies</li> <li>• Modal Shift</li> <li>• Luas extension</li> </ul>	<ul style="list-style-type: none"> <li>• Inclusion of a modal share target</li> <li>• Amendment of calculation of population for the plan</li> <li>• Amendments to reflect the new Housing Supply Target methodology in the Draft Plan- tables 2.7 and 2.8</li> <li>• Removal of the Fassaroe spur of the Luas extension from Map 14.</li> </ul>
<b>National Transport Authority</b>	<ul style="list-style-type: none"> <li>• Removal of the proposed Luas spur to Fassaroe</li> <li>• Inclusion of a more detailed and collaborative assessment of the Racecourse South lands</li> <li>• Changes to Section 5.3.2 relating to assessment of future roads</li> <li>• Policy Objective on Park and Ride office</li> </ul>	<ul style="list-style-type: none"> <li>• Removal of the Fassaroe spur of the Luas extension from Map 14.</li> <li>• Inclusion of new policy objective Policy Objective T2: Local Transport Plans</li> <li>• Inclusion of an new SLO to prepare an Area Based Transport Plan (ABTA) for the Racecourse South lands</li> <li>• Amendment of Section 5.3.2 to include reference to future assessment of road proposals</li> <li>• Inclusion of amendment on park and ride office</li> </ul>
<b>Introduction, Vision and Context</b>	<ul style="list-style-type: none"> <li>• Support for the Plan, the Vision and the Strategic County outcomes</li> <li>• Alternative suggestions for Vision and outcomes</li> </ul>	<ul style="list-style-type: none"> <li>• <i>No amendments recommended</i></li> </ul>

Section	Main Issues Raised	Main Recommended Amendments
<b>Section 3.2 Core Strategy</b>	<ul style="list-style-type: none"> <li>Plan under estimates housing needs and under provides in terms of land for housing</li> <li>Plan should take into account headroom</li> <li>No more development in Kiltiernan</li> <li>Support and opposition for Strategic Land Reserve (SLR)</li> </ul>	<ul style="list-style-type: none"> <li>Refer to recommendations on OPR submissions above</li> <li>No change to Strategic Land Reserve (SLR)</li> </ul>
<b>Section 3.3 Climate Action</b>	<ul style="list-style-type: none"> <li>Need to address new <i>Climate Action and Low Carbon Development (Amendment) Bill 2021</i></li> <li>Measuring of emissions</li> <li>Offshore wind energy</li> </ul>	<ul style="list-style-type: none"> <li>Inclusion of reference to Just Transition</li> <li>Reference to <i>Climate Action and Low Carbon Development (Amendment) Bill 2021</i></li> <li>Amendment to policy objective on Onshore and Offshore Wind Energy and Wave Energy</li> <li>New section on "Green Factor Method"</li> </ul>
<b>Section 3.4 Neighbourhood, People, Homes and Places</b>	<ul style="list-style-type: none"> <li>Support for and opposition to Sustainable Neighbourhood Infrastructure objectives.</li> <li>Provision of adequate schools across the County.</li> <li>Healthcare facilities</li> </ul>	<ul style="list-style-type: none"> <li>Further strengthening of section relating to development of SNI lands</li> <li>Additional references to permeability links</li> <li>Amendment to Healthcare policy objective</li> <li>Presumption against Shared living as per new Apartment Guidelines (Dec 2020)</li> </ul>
<b>Section 3.5 Transport and Mobility</b>	<ul style="list-style-type: none"> <li>Walking &amp; Cycling/Cycle paths/Cycle parking</li> <li>Need for assessment of new roads</li> <li>Bus Connects</li> <li>Request for various traffic management works</li> <li>Sutton to Sandycove Promenade and Cycleway (S2S)</li> <li>Dublin Eastern Bypass reservation (DEBP)</li> <li>Accessibility</li> </ul>	<ul style="list-style-type: none"> <li>Reference to Section criteria for assessment of new road proposals</li> <li>Updated text on Bus Connects</li> <li>Additional text on Active Schools Travel Initiative</li> <li>Reference to S2S</li> <li>Additional text on DEBP</li> <li>Additional references to accessibility</li> </ul>
<b>Section 3.6 Enterprise and Employment</b>	<ul style="list-style-type: none"> <li>Co working/remote hubs</li> <li>Tourism</li> </ul>	<ul style="list-style-type: none"> <li>New Policy Objective on remote working</li> <li>New text on accessible and inclusive tourism</li> <li>Amendments to include reference to new <i>National Marine Planning Framework (NMPPF)</i></li> </ul>
<b>Section 3.7 Towns, Villages and Retail Development</b>	<ul style="list-style-type: none"> <li>Support for new policy direction on multifunctional role of town and village centres</li> <li>Town Centre First Policy</li> <li>Issues in relation to Dundrum</li> </ul>	<ul style="list-style-type: none"> <li>New reference to town centre first approach</li> <li>Additional text on Dundrum LAP</li> </ul>
<b>Section 3.8</b>	<ul style="list-style-type: none"> <li>Requests for Draft Plan to protect various views and prospects</li> </ul>	<ul style="list-style-type: none"> <li>New reference to the 2020 Masterplan for Sandycove and Bullock Harbours.</li> </ul>

Section	Main Issues Raised	Main Recommended Amendments
<b>Green Infrastructure and Biodiversity</b>	<ul style="list-style-type: none"> <li>• Emphasis on Green Infrastructure</li> </ul>	<ul style="list-style-type: none"> <li>• New reference to historic routes and mass paths</li> <li>• New section on culverts</li> </ul>
<b>Section 3.9 Open Space, Parks and Recreation</b>	<ul style="list-style-type: none"> <li>• Requests for various improvements to parks and open spaces</li> <li>• Requests for provision of parks, open space and recreational facilities</li> <li>• Requests for tree symbols and Tree Preservation Orders</li> </ul>	<ul style="list-style-type: none"> <li>• Insertion and reinstatement of tree symbols on various sites</li> <li>• Provision of clarity on use of term Public Open Space</li> </ul>
<b>Section 3.10 Environmental Infrastructure and Flood Risk</b>	<ul style="list-style-type: none"> <li>• Request for removal of prohibition on development in Rathmichael (SLO 93)</li> </ul>	<ul style="list-style-type: none"> <li>• Removal of SLO 93 and strengthening of policy on waste water treatment plants</li> </ul>
<b>Section 3.11 Heritage and Conservation</b>	<ul style="list-style-type: none"> <li>• Access to and protection of various heritage sites</li> <li>• Request for policy on World Heritage Sites</li> </ul>	<ul style="list-style-type: none"> <li>• <i>No amendments recommended</i></li> </ul>
<b>Section 3.12 Development Management</b>	<ul style="list-style-type: none"> <li>• Build to Rent standards including those on mix and car parking</li> <li>• Child Care provision</li> <li>• Car parking standards</li> <li>• Open space standards</li> <li>• Noise</li> </ul>	<ul style="list-style-type: none"> <li>• Clarity in accordance with Section 28 guidelines, that mix requirements do not apply to Build to Rent</li> <li>• Childcare provision to be open preferably prior to occupation</li> <li>• Inclusion of supermarket car parking standard</li> <li>• Change INST and SNI public open space requirement to 20%</li> <li>• Change open space requirement for residential in existing built up area to 10%</li> <li>• Reference to Section 34 of the Act in relation to planning conditions on Noise</li> </ul>
<b>Section 3.13 Land use zoning</b>	<ul style="list-style-type: none"> <li>• Request that Build to Rent not be considered as a separate use class and that it be allowed in different land use zoning objectives</li> </ul>	<ul style="list-style-type: none"> <li>• Recommend that Build to Rent is clarified as “Residential – Build to Rent”</li> <li>• Strengthening of wording for “A” land use zoning objective</li> </ul>
<b>Section 3.14 Specific Local Objectives</b>	<ul style="list-style-type: none"> <li>• Request for various new SLOs regarding healthcare, camping, Dundrum, Sallynoggin and deletion of current SLOs including one relating to Brennanstown Road.</li> </ul>	<ul style="list-style-type: none"> <li>• New SLOs for Hospitals in the County</li> <li>• New SLO for holiday caravan/camping facilities in Glencullen area</li> <li>• Removal of SLO on extension to Shanganagh Park</li> </ul>
<b>Section 3.15 Implementation, Monitoring and Evaluation</b>	<ul style="list-style-type: none"> <li>• Support for the new chapter</li> <li>• Need for SEA monitoring</li> </ul>	<ul style="list-style-type: none"> <li>• New Policy Objective for SEA monitoring</li> </ul>
<b>Appendices</b>	<ul style="list-style-type: none"> <li>• Housing Mix</li> <li>• Queries regarding additions to the Record of Protected Structures (RPS)</li> </ul>	<ul style="list-style-type: none"> <li>• Updating of Housing Strategy and HNDA to acknowledge new guidelines on HNDA and changes to apartment guidelines on shared living</li> </ul>

Section	Main Issues Raised	Main Recommended Amendments
	<ul style="list-style-type: none"> <li>• Climate change and flooding, specific flooding issues, use of justification test</li> <li>• Request for changes including rezoning in the Sandyford Urban Framework Plan (SUFP).</li> <li>• Rights of Way</li> </ul>	<ul style="list-style-type: none"> <li>• Changes to Draft RPS list – some NIAH recommendations now recommend exterior only for listing</li> <li>• Progression of Dundrum ACA</li> <li>• Updating of Flood maps to include coastal flooding due to climate change scenarios</li> <li>• Removal of St Laurence's and Marino Avenue ROW</li> </ul>
SEA and AA	<ul style="list-style-type: none"> <li>• Geological Survey Ireland (GSI) recommend inclusion of datasets.</li> <li>• SEA monitoring should be strengthened</li> </ul>	<ul style="list-style-type: none"> <li>• Inclusion of a new Strategic Environmental Objective (SEO) on material assets</li> <li>• New Policy Objective on SEA monitoring</li> </ul>
Land Use Mapping	<ul style="list-style-type: none"> <li>• Various rezoning requests for lands including</li> <li>• Clonkeen College</li> <li>• Our Lady's Grove, Goatstown</li> <li>• Lands at Kiltiernan</li> <li>• Lands at Woodbrook and Old Connaught</li> </ul>	<ul style="list-style-type: none"> <li>• Rezoning of anomalies in relation to open space and SNI at National Rehabilitation Hospital/Amgen, Carrickbrennan Lawns,</li> <li>• Rezoning from F to A at Our Ladies Grove, Goatstown and The Park, Cabinteely</li> </ul>
Miscellaneous	<ul style="list-style-type: none"> <li>• Dog fouling</li> <li>• SHD process</li> </ul>	<ul style="list-style-type: none"> <li>• <i>No amendments recommended</i></li> </ul>



## **Part 2: Summary of the Observations, Submissions and Recommendations of the Office of the Planning Regulator and the Issues Raised and Recommendation of the Eastern Midlands Regional Authority and the National Transport Authority and Executive's Response and Recommendations**



## 2.1: Summary of the Observations, Submissions and Recommendations of the Office of the Planning Regulator

Section 31P (1) (A) of the Planning and Development Act, 2000 (as amended) sets out the functions of the Office of the Planning Regulator (OPR) which include evaluation and assessment of development plans, including draft development plans, and provision of observations and recommendations to the planning authority as appropriate.

Under section 31p (1) (b) The OPR may inform the Minister if, in the opinion of the Office, the Plan is not consistent with its observations and recommendations, especially where, in its opinion, failure to be so consistent would affect the overall strategy for proper planning and sustainable development of the area concerned. In performing its functions, the OPR shall have regard to the requirements of the NPF and RSES.

The OPR have evaluated and assessed the Draft Plan in accordance with Section 31 (AM). In assessing and evaluating the Office shall endeavour to ensure that, it addresses the legislative and policy matters relating to development plans as follows:

*“(a) matters generally within the scope of section 10 and, in particular, subsection (2)(n) of that section in relation to climate change;*  
*(b) consistency with the development plan and the National Planning Framework and regional spatial and economic strategies;*  
*(c) relevant guidelines for planning authorities made under section 28 , including the consistency of development plans with any specific planning policy requirements specified in those guidelines;*  
*(d) policy directives issued under section 29;*  
*(e) such other legislative and policy matters as the Minister may communicate to the Office in writing, the effect of which shall be published on the website of the Office”.*

In accordance with section 31 (AM) (6) *“A planning authority shall notify the Office within 5 working days of the making of a development plan or a variation to a development plan and send a copy of the written statement and maps as duly made and where the planning authority —*

*(a) decides not to comply with any recommendations made in the relevant report of the Office, or*  
*(b) otherwise make the plan in such a manner as to be inconsistent with any recommendation made by the Office,*  
*then the Chief Executive shall inform the Office accordingly in writing, which notice shall state reasons for the decision of the planning authority”.*

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
<p><b>2.1 Office of the Planning Regulator – B1102</b></p>	
<p><b>2.1.1 Introduction</b></p>	
<p>i) The introduction:</p> <ul style="list-style-type: none"> <li>● Acknowledges the considerable work undertaken by the Local Authority in the preparation of the Draft Plan against the backdrop of an evolving national and regional planning policy and regulatory context.</li> <li>● Highlights the recent Ministerial Circular relating to <i>Structural Housing Demand in Ireland and Housing Supply Targets</i>, and the associated Section 28 Guidelines: <i>Housing Supply Target Methodology for Development Planning</i> and notes the Planning Authority will be required to review the Draft Plan in the context of this guidance.</li> <li>● States the OPR has evaluated and assessed the Draft Plan, under the provisions of sections 31AM(1) and (2) of the Planning and Development Act 2000, (as amended).</li> <li>● States that <b>Recommendations</b> issued by the OPR relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under Section 28. The Planning Authority is required to implement, or address recommendations made by the OPR.</li> <li>● States that Observations issued by the OPR comprise a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan, on issues that are required to ensure alignment with policy and legislative</li> </ul>	<p>The comments of the OPR are noted.</p> <p>The Planning Authority welcomes the OPR’s acknowledgement of both the considerable work undertaken by the Local Authority in the preparation of the Draft Plan, and also the recognition of the evolving planning policy and regulatory context in which the Plan is being made.</p> <p>The Planning Authority would also like to acknowledge the considerable analysis undertaken by the OPR in the context of an evolving national and regional planning policy and regulatory context. The Planning Authority would in particular recognise the difficulty in formulating detailed <b>Recommendations</b> in the absence of updated Development Plan Guidelines, and the introduction of new national Guidelines, including the recent introduction of the Guidelines ‘Housing Supply Target Methodology for Development Planning’ in December 2020, post the drafting of this Plan, which play an important role in the plan-making process.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
<p>provisions. The Planning Authority is requested to action an Observation.</p>	
<p><b>2.1.2 Overview</b></p>	
<p>i) Commends the Planning Authority for the overall scope and quality of the Draft County Development Plan, including the associated documents and detailed assessments which support an evidence-based approach to planning. Highlights in particular the following:</p> <ul style="list-style-type: none"> <li>• The Building Height Strategy (Appendix 5) comprises a proactive approach to accommodating buildings of height.</li> <li>• The Development Management Thresholds will facilitate compact growth, sustainable transport and climate mitigation.</li> <li>• The Guidelines on Sustainable Drainage System Measures (Appendix 7) and the Green Infrastructure Strategy (Appendix 16) will assist the County in adapting to climate change and improve biodiversity and amenities.</li> <li>• The Interim Dún Laoghaire UFP (Appendix 8) and Draft Sandyford UFP 2022-2028 (Appendix 17) will facilitate the redevelopment of these urban areas, with potential for positive impacts on compact growth, sustainable transport and climate mitigation.</li> <li>• Appendix 14 comprises a comprehensive statement of compliance with Section 28 Guidelines.</li> <li>• The OPR welcomes the inclusion of a strategy for the implementation, monitoring and evaluation (Chapter 15) and considers it to be an example of best practice.</li> </ul>	<p>The comments of the OPR are noted. The Planning Authority welcomes the many positives in the Draft Plan highlighted by the OPR.</p> <p>The concerns raised by the OPR in the overview section are addressed in detail in the following sections.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
<p>States that DLR, due to its location wholly within the Dublin Metropolitan Area and largely within Dublin City and Suburbs, with high quality public transport and accessibility infrastructure, will be critical in achieving the National Strategic Outcomes of the NPF, including NSO 1 - compact growth, and NSO 2 - sustainability.</p> <p>Supports the overall approach to sustainable settlement and transport strategies in the Draft County Development Plan, including the focus on compact growth, infill/brownfield development, consolidation within or contiguous to the existing built up area, and the adoption of the Avoid-Shift-Improve approach to transportation and mobility.</p> <p>Raises concerns that the population and housing supply targets appear to be significantly in excess of that required to facilitate growth for the Plan period and results in surplus lands zoned for residential uses.</p> <p>Suggests the Planning Authority focus on implementing phased development of sequentially favourable, serviced, or serviceable lands, consistent with the tiered approach to zoning, and in proximity to high quality transport.</p> <p>Raises serious concern regarding the potential for the combined development objectives for the Ballyogan, Carrickmines, Kiltiernan-Glenamuck and Cherrywood SDZ to materially adversely affect the strategic traffic function of the national road network and the light rail network.</p>	

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
<p>Considers the overall approach to transport to be consistent with the requirements to address climate change mitigation under section 10(2)(n) of the Act. Submits the OPR is not satisfied that the proposal to zone land identified in the SFRA as at risk from flooding for vulnerable uses, is consistent with the requirements of the Flood Risk Management Guidelines (2009).</p>	
<p><b>Core Strategy</b></p>	
<p><b>2.1.3 Core Strategy</b></p>	
<p>i) <b>Calculation of the Population Target</b>                      The OPR raises two primary concerns in relation to how the population target was calculated: how the ‘headroom’ allowance was applied; and the appropriate timeframe that was incorporated. Considers the application of these measures has resulted in an excess against the growth provided for under the NPF Implementation Roadmap.</p> <p><b>Plan Timeframe</b>                      Notes the Core Strategy provides for two-year’s growth post 2026, notwithstanding the plan extends only to Q4 2027, or one full year. Submits this has the effect of extending the population projections for an additional year beyond the plan period.</p> <p><b>Application of 25% Population Headroom Allowance</b>                      Notes the Core Strategy adds the 25% Roadmap headroom allowance for 2026 to the RSES population target for 2031. Submits that the NPF Roadmap does not provide for an increase in population above the NPF/RSES targets over the medium to longer term, but rather only</p>	<p><b>OPR Recommendation 1(a)</b>  <b>Having regard to the population capacity targets for the Planning Authority under Appendix B of the Eastern and Midland Regional Assembly Regional Spatial and Economic Strategy and the transitional population targets and provisions contained in the NPF Implementation Roadmap, including 25% headroom to 2026, the Planning Authority is required to revise the core strategy population targets for the 6-year plan period to ensure that the population targets for the plan period are consistent with the Roadmap’s transitional targets.</b></p> <p><b>OPR Recommendation 1(a): Executive’s Response</b>                      The OPR’s two primary concerns in relation to how the population target was calculated include: the appropriate timeframe that was incorporated: and how the additional 25% population ‘headroom’ allowance was applied. Each of these matters will be addressed in turn hereunder.</p> <p><i>Plan Timeframe</i>                      The Local Authority acknowledges the comments of the OPR with regard to the timeframe which informs the calculation of population in Section 2.3.2 of the Draft Plan. It is noted that the introduction of the recent Section 28 Guidelines ‘Housing Supply Target Methodology for Development Planning’ (2020) has introduced, for the first time, a more granular calculation of housing calculated on the basis of a Plan timeframe broken down by quarter year.</p> <p>It is anticipated that the DLR County Development Plan will be adopted in early March 2021, and the likely operational period for the County Development Plan will be Q2 2022 to Q1 2028. On this basis it is</p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
<p>amends the target to 2026 for counties that have been growing in excess of the NPF growth strategy, to allow those counties additional time to realign their growth through short term front-loading growth.</p> <p>Considers that the application of the headroom allowance beyond 2026 is not supported under the Roadmap and results in excessive growth for the plan period.</p> <p><b>Section 28 Guidelines: Housing Supply Target Methodology for Development Planning</b></p> <p>Refers to the new Guidelines which specify that it is necessary to demonstrate the manner in which the Core Strategy and other elements of the Plan are consistent with the NPF 50:50 City housing demand projection scenario identified by the ESRI.</p> <p>Notes that while the associated Circular makes specific provision for certain local authorities, to increase housing provision up to 2026 in order to facilitate convergence with the NPF, that no such provision applies to DLR.</p> <p>Submits that the housing requirements in the Core Strategy exceeds the housing supply target calculated when applying the methodology in the Guidelines. Considers this is in part due to the population growth targets referenced above.</p> <p>Notes, however, that a significant proportion of the excess identified in the Core Strategy (e.g. 2,590 units at Cherrywood) is anticipated to be delivered during the course of the subsequent development plan period.</p>	<p>recommended that the calculation of population for the Plan period – set out in Table 2.5 of the Draft Plan - is amended to reflect the plan period up to Q1 2028 only and does not incorporate the full year 2028.</p> <p>Additional proposed amendments required to be made as a result of the revised population figure include: associated text changes pertaining to Section 2.3.2.1(iv) and amendments to Table 2.5; amendments to the population figures included in Table 2.7; amendments to the text and table relating to the Strategic Land Reserve set out in Section 2.4.5 and Table 2.11; and, amendment of the jobs forecast for the County set out in Section 2.4.8.4 and Table 2.13. The amendments to the population figure are relatively minor and are not considered to have any material impact upon the recommendations set out in the Draft Plan with respect to employment lands or the Strategic Land Reserve.</p> <p>Resultant changes to the calculation of the housing target for the Core Strategy, brought about by the proposed amendment to the population allocation, will be reflected below in response to <b>Recommendation 1(b)</b> from the OPR.</p> <p><i>Application of the 25% Population Headroom Allowance</i></p> <p>The Local Authority acknowledges the OPR’s comments regarding the intended application of the additional 25% population ‘headroom’ allowance provided for in the NPF Implementation Roadmap (Circular FPS04/2018) but would have concerns that the recommendation of the OPR on this issue comprises an interpretation which is not clearly supported by the contents of the government Circular, Ministerial Guidelines and national guidance.</p> <p>In advance of responding to the main issue raised by the OPR, it is worth setting out a brief overview of the population ‘modifiers’ which inform the population allocation required to be applied by Local Authorities for strategic decision-making in the plan-making process. While the growth strategy for the NPF was initially informed by demographic analysis carried out by the ESRI in the publication ‘<i>Prospects for Irish Regions and Counties: Scenarios and Implications</i>’ (2018), the actual population allocations utilised by Local Authority’s in the plan-making process comprise significantly modified versions of the initial demographic analysis. It is thus more correct to assume the population figures which underpin the Core Strategy as population ‘allocations’ rather than purely demographic based projections. Each of the modifications set out below were introduced for separate reasons as follows:</p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
<p><b>Recommendation 1 – Core Strategy</b></p> <p>a) <b>Having regard to the population capacity targets for the planning authority under appendix B of the Eastern and Midland Regional Assembly Regional Spatial and Economic Strategy and the transitional population targets and provisions contained in the NPF Implementation Roadmap, including 25% headroom to 2026, the planning authority is required to revise the core strategy population targets for the 6-year plan period to ensure that the population targets for the plan period are consistent with the Roadmap’s transitional targets.</b></p> <p>b) <b>Having regard to the issuing of section 28 Housing Supply Targets Methodology for Development Planning Guidelines for Planning Authorities (December 2020) at the end stage of the preparation of the Draft Plan, and to the apparent significant over-estimate of housing units provided for under the draft core strategy, the planning authority is required to review the core strategy to ensure consistency with the aforementioned guidelines.</b></p>	<p><u>Modifier 1:</u> National Planning Framework – Page 25 of the NPF states that an allowance of approx. 25% more population (above the ESRI baseline projection) is provided to account for:</p> <ul style="list-style-type: none"> <li>○ The possibility of higher net in-migration over the period to 2040; and,</li> <li>○ To enable ambition and flexibility in planning for future growth.</li> </ul> <p><u>Modifier 2:</u> Implementation Roadmap for the NPF - The NPF Roadmap introduced the concept of ‘transitional’ population projections which added a further 25% growth nationally to 2026 (‘over and above’ the population projected to 2026 in the NPF). The rationale for introducing ‘transitional population projections’ was to plot a growth trajectory set approximately mid-way between what is currently being planned for in statutory Development Plans if projected forward to 2031, and the more likely evidence based and nationally coherent projected scenario to 2031 and 2040. As stated in the Roadmap the ‘transitional’ figures were applied to 2026 and also informed the period to 2031. The ‘transitional’ population projections of the NPF Roadmap were subsequently incorporated into the statutory RSES.</p> <p>It is highlighted that while cumulatively the transitional population projections comprised an increase of 25% national growth, the distribution of same across the Country was not equal. For example, population growth attributed to the ‘transitional’ modification in the EMRA Region for the 2031 high growth scenario equated to a 9.7% increase whereas the corresponding growth adjustment for the North and Western Region comprised a c. 52% increase and the Southern Region comprised a 40% increase. While provision for 50% more growth than is required to 2026 is accounted for at a national level – this is not the case for the EMRA Region which includes Dún Laoghaire-Rathdown.</p> <p><u>Modifier 3:</u> Implementation Roadmap for the NPF - The NPF Roadmap provides that scope for additional population ‘headroom’, not exceeding 25%, can be considered to 2026 in certain counties. This population ‘headroom’ allowance is in addition to the ‘transitional’ population projections contained in Appendix B of the RSES. As referred to in the NPF Roadmap, the rationale for inclusion of the additional population ‘headroom’ originates from paragraph 4.14 of the existing Development Plan Guidelines for Planning Authorities (2007), which provides that Planning Authorities may make provision for 50% more zoned land than is required to meet demand during the six-year lifetime of a Development Plan i.e. sufficient land for a further three years.</p> <p><u>Modifier 4:</u> NPO 68 of the NPF provides a further population allowance of up to 20% of the targeted growth in the City being transferred to other settlements in the MASP – one of which is Bray. Under this</p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
	<p>Objective, DLR was allocated an additional 3,500 population for Bray (DLR) under the 2031 high growth scenario.</p> <p>The OPR has raised concerns regarding the appropriate application by the Local Authority of ‘Modifier 3’ - the 25% population ‘headroom’ allowance. In this context, it is highlighted that the preparation of the Core Strategy of the Draft County Development Plan, and indeed the preparation of the submission from the OPR, were both prepared in the absence of any detailed national guidance with respect to the appropriate calculation of this population ‘headroom’ allowance. Page 5 of the NPF Roadmap, which was published in 2018, specifically referred to forthcoming updated Development Plan guidance with regard the role of population ‘headroom’, yet to date, c. 2 years since the issuing of the NPF Roadmap, no such guidance has been published.</p> <p>It is considered that the absence of updated national guidance on the matter, in combination with the contents of the NPF Roadmap Circular which lacks the requisite clarity governing the calculation of population headroom, has resulted in a situation where varying interpretations with regard to the application of this ‘headroom’ may be reached. Notwithstanding, the Planning Authority are of the opinion that the additional 25% population ‘headroom’ allowance has been applied correctly in the Core Strategy of the Draft Plan. The following sets out the rationale for the Local Authority’s position on same.</p> <p>With regard to the application of the additional population ‘headroom’ allowance, the relevant extract from page 5 of the NPF Roadmap is as follows:</p> <p><i>‘Scope for headroom, not exceeding 25%, can be considered to 2026 in those counties where projected population growth is projected to be at or above the national average baseline (i.e. Cork (City and County), Dublin (all four local authorities), Galway (City and County), Kildare, Limerick, Louth, Meath, Sligo, Waterford, Westmeath, and Wicklow’</i></p> <p>The following extract from section 2.3.2.1 (ii) of the Draft Plan details how the additional ‘headroom’ allowance was factored into the calculation of population for the Core Strategy:</p> <p><i>‘The Implementation Roadmap for the National Planning Framework recognises that there are parts of the Country where population growth is projected to be at or above the national average baseline for growth. In Counties where population growth is projected to be at or above the national average baseline, <b>the</b></i></p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
	<p><b><i>Implementation Roadmap makes provision for headroom, not exceeding 25%, to be considered up to 2026. DLR is specifically identified in the list of Counties where this additional headroom applies. In accordance with the Implementation Roadmap, Table 2.3 sets out the population targets contained in Appendix B of the RSES, adjusted to factor in an additional 25% headroom up to 2026. Population growth between the period 2026 to 2031 remains unchanged save for the requirement to adjust to take account of the 25% additional growth allocated between the period 2016 to 2026.</i></b></p> <p>It is worth re-iterating that the Core Strategy of the Draft Plan only calculates the additional 25% population ‘headroom’ on the basis of the overall growth allocation for the period up to 2026. The question has arisen however as to whether, or whether not, it was the intention of the NPF Roadmap that this additional population headroom allowance should subsequently inform the period up to 2031. The NPF Roadmap would appear to be silent on this matter and as such an inference is required to be drawn.</p> <p>In preparing the Core Strategy, the Local Authority fully considered whether the application of the additional 25% headroom allowance up to 2026 was intended to inform the period up to 2031. In the absence of clear national guidance on the matter, the following provided some of the key considerations which informed the Local Authorities approach:</p> <p><u><i>NPF Roadmap Methodology for calculating the ‘Transitional Population Allowance’</i></u>  The following extract from the NPF Roadmap outlines the methodology applied in calculating the transitional population projections:</p> <p><i>‘The transitional projections based on the methodology described above and in Appendix 2, add a further 25%, over and above the population projected to 2026 in the NPF.’</i> (NPF Roadmap, p.5)</p> <p><i>‘The transitional population projections plot a growth trajectory set approximately mid-way between what is currently being planned for in statutory Development Plans if projected forward to 2031, and the more likely evidence based and nationally coherent projected scenario to 2031 and 2040. <b>These ‘adjusted’ transitional figures will apply to 2026 and will also inform the period to 2031.</b></i>’ (NPF Roadmap, p. 4)</p> <p>As stated in the NPF Roadmap, the ‘transitional’ population projections add a further 25% over the NPF population growth to 2026 and, importantly, <u>informs the period up to 2031</u>. The stated methodology applied in the NPF Roadmap for the calculation of ‘transitional’ population projections is the same as that</p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
	<p>applied by the Local Authority to calculate the additional population ‘headroom’ in the Core Strategy, in that both are calculated on the period up to 2026, but also inform the period up to 2031.</p> <p><u><i>The Purpose of ‘Headroom’</i></u>                      The purpose of a ‘headroom’ allowance is a long standing feature of County Development Plans and is explained in the existing Development Plan Guidelines (2007). When referring to ‘headroom’, the NPF Roadmap specifically refers to Section 4.14 of the 2007 Guidelines which states the following:</p> <p><i><b>‘Planning authorities should take all reasonable steps to ensure that sufficient zoned residential land is available throughout the lifetime of the development plan and beyond to meet anticipated needs and allow for an element of choice. In particular, to ensure continuity of supply of zoned residential land, planning authorities should ensure that at the time they make a development plan, enough land will be available to meet residential needs for the next nine years. In this way, development plans will provide for sufficient zoned land to meet not just the expected demand arising within the development plan period of six years, but will also provide for the equivalent of 3 years demand beyond the date on which the current plan ceases to have effect.’</b></i></p> <p>The intended purpose of ‘headroom’, as stated in the 2007 Development Plan Guidelines, is to ensure that there is sufficient residential zoned land available throughout the Plan period and beyond, and to allow for an element of choice. This allowance is particularly important to ensure that: planning permission may be granted within the lifetime of the County Development Plan which may be delivered during the lifetime of the subsequent plan-period; and, that there is sufficient availability of land in a land-market which is susceptible to impediments. Page 5 of the NPF Roadmap specifically refers to the 2007 Guidelines when outlining the rationale for inclusion of the additional population ‘headroom’ allowance.</p> <p>It is considered that the application of population ‘headroom’ in the Draft Plan, which is calculated on the period up to 2026 but informs the period up to 2031, is in line with the intended role of ‘headroom’, as set out in the relevant Section 28 Development Plan Guidelines and as referred to in the NPF Roadmap.</p> <p><u><i>RSES Guidance on the Application of Headroom</i></u>                      The transitional population projections, set out in Appendix 2 of the NPF Roadmap, were incorporated into the statutory RSES which provided a breakdown of population for the four Dublin Local Authorities (RSES, Appendix B).</p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
	<p>With regard to the application of population ‘headroom’, page 50 of the RSES states that the NPF Roadmap population projections ‘...<i>may be supplemented by additional 25% headroom</i>’ and that the population headroom ‘... <i>may be applied regionally and locally, at RSES and city and County development plan stage.</i>’ The RSES further notes that ‘<i>Application of headroom is particularly relevant to urban areas, particularly the five cities, where the aim is to target at least half of future housing delivery within existing built-up areas.</i>’</p> <p>The submission received from the Eastern Midland Regional Assembly included an assessment of the population projections included in Table 2.5 of the Draft Plan. The following sets out the conclusion reached by EMRA on the matter:</p> <p><i>‘Table 2.5 details the Core Strategy population projections as set out above and adjusted to the County Development Plan timelines up to 2028 (up to 258,375 population or 40,375 additional growth) over the census 2016 baseline, <b>which is consistent with the NPF Roadmap and RSES Appendix B (high) and NPO 68.</b>’</i></p> <p>The assessment undertaken by the EMRA aligns with the Planning Authority’s position that the 25% additional population ‘headroom’ allowance was applied correctly in the Core Strategy of the Draft Plan.</p> <p><u>Scenario Testing</u></p> <p>As part of the preparatory work which informed the plan-making process, the Planning Authority compared different scenarios to better understand the potential outcomes and implications relating to the application of the 25% headroom. The Figure below is an extract from the Core Strategy of the Draft Plan (Figure 2.2) where the additional 25% population ‘headroom’ allowance up to 2026 informs the 2031 growth projection. The Figure provides a breakdown of average annual population growth for the periods 2016 to 2026 and 2026 to 2031. The Figure illustrates the intended ‘front loading of growth’ for the period up to 2026 as described in the NPF Roadmap with an average population allocation of 3,436 persons per annum between 2016 and 2026, which falls to 3,000 persons per annum for the period between 2026 and 2031.</p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation															
	<div data-bbox="920 284 1655 882"> <p><b>Average Annual Population Growth</b></p> <table border="1"> <thead> <tr> <th>Period</th> <th>Low Growth Scenario</th> <th>High Growth Scenario</th> </tr> </thead> <tbody> <tr> <td>2006-2011</td> <td>2445</td> <td>-</td> </tr> <tr> <td>2011-2016</td> <td>2351</td> <td>-</td> </tr> <tr> <td>2016-2026 (Low and High)</td> <td>2873</td> <td>3436</td> </tr> <tr> <td>2026-2031 (Low and High)</td> <td>1900</td> <td>3000</td> </tr> </tbody> </table> <p><i>Figure 2.2: Average Annual Population Growth</i></p> <p><sup>1</sup> 25% additional 'headroom' applied in both low and high growth scenario up to 2026 only.  <sup>2</sup> Additional 3,500 'relocated growth' applied to 2026-2028 population target on a pro-rata basis.</p> </div> <p>The following Table illustrates the scenario whereby the additional 25% population ‘headroom’ allowance does not inform the period up to 2031. As illustrated, total population growth allocation for the five years between 2026 and 2031 would comprise only 8,125 persons or 1,625 persons per year (in the high growth scenario). This would equate to c. 707 homes per annum for the period 2026 to 2031. It is further highlighted that 3,500 of the population allocation for the period 2026 to 2031 is specifically designated for the future growth of the Key Town of Bray, which would leave a provision of only c. 402 homes per annum for all other areas in the County outside of the Key Town of Bray. It is considered that these potential implications are clearly inconsistent with the intended role of population ‘headroom’, as referred to in the NPF Roadmap, and defined in the 2007 Guidelines.</p>	Period	Low Growth Scenario	High Growth Scenario	2006-2011	2445	-	2011-2016	2351	-	2016-2026 (Low and High)	2873	3436	2026-2031 (Low and High)	1900	3000
Period	Low Growth Scenario	High Growth Scenario														
2006-2011	2445	-														
2011-2016	2351	-														
2016-2026 (Low and High)	2873	3436														
2026-2031 (Low and High)	1900	3000														

Observations, Submissions and Recommendations	Executive’s Response & Recommendation															
	<div data-bbox="920 280 1868 842" data-label="Figure"> <p>Average Annual Population Growth</p> <table border="1"> <thead> <tr> <th>Period</th> <th>Low</th> <th>High</th> </tr> </thead> <tbody> <tr> <td>2006-2011</td> <td>2445</td> <td>-</td> </tr> <tr> <td>2011-2016</td> <td>2351</td> <td>-</td> </tr> <tr> <td>2016-2026 (Low and High)</td> <td>2873</td> <td>3436</td> </tr> <tr> <td>2026-2031 (Low and High)</td> <td>750</td> <td>1625</td> </tr> </tbody> </table> </div> <p data-bbox="913 879 1989 938">The following extract comprises the OPR’s rationale which underpins the recommendation that the additional 25% population ‘headroom’ allowance is not intended to inform the period up to 2031:</p> <p data-bbox="913 978 1984 1070"><i>‘The proposed core strategy of the Draft Plan has a target County population of 258,375 to 2028, representing an increase of 40,375. This represents an apparent excess of 4,646 against the growth provided for under the NPF Implementation Roadmap (the Roadmap).</i></p> <p data-bbox="913 1110 2051 1334"><i>The difference would appear to arise from the planning authority’s addition of the 25% Roadmap headroom allowance for 2026 to the RSES population target for 2031. <b>The Roadmap does not, however, provide for an increase in population above the NPF/RSES targets over the medium to longer term, but rather only amends the target to 2026 for counties that have been growing in excess of the NPF growth strategy, to allow those counties additional time to realign their growth through short-term front-loading growth. The Office considers that the application of the headroom allowance beyond 2026 is not supported under the Roadmap and results in excessive growth for the plan period.</b></i></p>	Period	Low	High	2006-2011	2445	-	2011-2016	2351	-	2016-2026 (Low and High)	2873	3436	2026-2031 (Low and High)	750	1625
Period	Low	High														
2006-2011	2445	-														
2011-2016	2351	-														
2016-2026 (Low and High)	2873	3436														
2026-2031 (Low and High)	750	1625														

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
	<p>The Local Authority has objectively assessed the contents of the NPF Roadmap and is of the opinion that the application of the additional 25% population ‘headroom’ in the Core Strategy of the Draft Plan is not inconsistent with the NPF Roadmap. In reaching this conclusion, the Local Authority has considered: the associated NPF Roadmap methodology for the calculation of the ‘Transitional Population Allowance’; the purpose of ‘headroom’ as detailed in the Section 28 Development Plan Guidelines (2007); the RSES Guidance on the application of ‘headroom’ and their assessment of same; and, the potential scenario whereby the additional ‘headroom’ does not inform the period up to 2031.</p> <p>The Planning Authority has concerns with the contention in the submission from the OPR that the intended purpose of the additional ‘headroom’, is to allow certain Counties ‘...additional time to realign their growth through short-term front-loading growth.’ As noted above, the NPF Roadmap specifically refers to the purpose of ‘headroom’ as that included in the Section 28 Development Plan Guidelines (2007). The purpose of this ‘headroom’ is to provide additional residential zoned land for beyond the lifetime of the Plan and to allow for an element of choice, and not for the purpose of front-loading growth as stated in the submission from the OPR. It is considered that the rationale included by the OPR in support of this recommendation reflects the different interpretations on the application of ‘headroom’ in the NPF Roadmap and also the absence of revised Development Plan Guidelines on the matter (Note: Guidance note issued in 2010 on Core Strategies prior to the RSES and NPF and other significant amendments to legislation).</p> <p>It is considered that the approach applied in the Draft Plan, with respect to the application of the additional 25% population ‘headroom’ allowance, does not comprise a breach of, and furthermore is consistent with, the relevant provisions of the national and regional policy framework and the policy of Government as set out in government Circular’s and Ministerial Guidelines under Section 28.</p> <p><b>OPR Recommendation 1(a): Executive’s Recommendation</b>  Amend Section 2.3.2.1 (iv) as follows:</p> <p><i>(iv) Population Projection for the Draft DLR County Development Plan 2022-2028</i>  <i>Table 2.5 details the low and high population projections for DLR for the Plan period 2022-2028. These population projections, which inform the Core Strategy of the Draft County Development Plan, are directly informed by the provisions of the NPF and RSES and are in effect a trickle down from these higher-tier planning policy strategies. In order to take account of the variation between plan timeframes (the County</i></p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation																								
	<p><i>Development Plan covers the period up to 2028 whereas the RSES covers the period up to 2031) the population targets set out in Table 2.5 below incorporate <del>1 ½</del> 2 years (25% <del>40%</del>) of the 2026-2031 population growth timeframe. The residual population growth to 2031 falls outside the County Development Plan period and is therefore not included in calculating population projections for the Core Strategy.</i></p> <p>Amend ‘Table 2.5: DLR Core Strategy – Population Projections’ as follows:</p> <p>Existing Table 2.5:</p> <p><b>Table 2.5: DLR Core Strategy – Population Projections</b></p> <table border="1" data-bbox="920 624 2065 762"> <thead> <tr> <th></th> <th>2016</th> <th>2026 (Low to High)</th> <th>2028 (Low to High)</th> <th>Total Population Growth 2016-2028</th> <th>Average Annual Pop Growth 2016-2028</th> </tr> </thead> <tbody> <tr> <td>Dún Laoghaire-Rathdown</td> <td>218,000</td> <td>246,750 – 252,375<sup>1</sup></td> <td>250,550 – 258,375<sup>2</sup></td> <td>32,550 – 40,375</td> <td>2,713 – 3,365</td> </tr> </tbody> </table> <p>Amended Table 2.5:</p> <table border="1" data-bbox="920 826 2065 1093"> <thead> <tr> <th></th> <th>2016</th> <th>2026 (Low to High)</th> <th><del>2028-Q1 2028</del> (Low to High)</th> <th>Total Population Growth <del>2016-2028-2016-Q1 2028</del></th> <th>Average Annual Pop Growth <del>2016-2028</del></th> </tr> </thead> <tbody> <tr> <td>Dún Laoghaire-Rathdown</td> <td>218,000</td> <td>246,750 – 252,375</td> <td><del>250,550 – 258,375</del> 249,125 – 256,125</td> <td><del>32,550 – 40,375</del> 31,125 – 38,125</td> <td><del>2,713 – 3,365</del> 2,594 – 3,177</td> </tr> </tbody> </table> <p>Amend the top three rows of ‘Table 2.7: Core Strategy Housing Target’ as follows:</p> <p>Existing Table 2.7</p>		2016	2026 (Low to High)	2028 (Low to High)	Total Population Growth 2016-2028	Average Annual Pop Growth 2016-2028	Dún Laoghaire-Rathdown	218,000	246,750 – 252,375 <sup>1</sup>	250,550 – 258,375 <sup>2</sup>	32,550 – 40,375	2,713 – 3,365		2016	2026 (Low to High)	<del>2028-Q1 2028</del> (Low to High)	Total Population Growth <del>2016-2028-2016-Q1 2028</del>	Average Annual Pop Growth <del>2016-2028</del>	Dún Laoghaire-Rathdown	218,000	246,750 – 252,375	<del>250,550 – 258,375</del> 249,125 – 256,125	<del>32,550 – 40,375</del> 31,125 – 38,125	<del>2,713 – 3,365</del> 2,594 – 3,177
	2016	2026 (Low to High)	2028 (Low to High)	Total Population Growth 2016-2028	Average Annual Pop Growth 2016-2028																				
Dún Laoghaire-Rathdown	218,000	246,750 – 252,375 <sup>1</sup>	250,550 – 258,375 <sup>2</sup>	32,550 – 40,375	2,713 – 3,365																				
	2016	2026 (Low to High)	<del>2028-Q1 2028</del> (Low to High)	Total Population Growth <del>2016-2028-2016-Q1 2028</del>	Average Annual Pop Growth <del>2016-2028</del>																				
Dún Laoghaire-Rathdown	218,000	246,750 – 252,375	<del>250,550 – 258,375</del> 249,125 – 256,125	<del>32,550 – 40,375</del> 31,125 – 38,125	<del>2,713 – 3,365</del> 2,594 – 3,177																				

Observations, Submissions and Recommendations	Executive’s Response & Recommendation																		
	<p><b>Table 2.7: Core Strategy Housing Target</b></p> <table border="1" data-bbox="922 316 1393 517"> <thead> <tr> <th></th> <th>2016</th> <th>2028 – RSES High Growth Scenario</th> </tr> </thead> <tbody> <tr> <td>Population</td> <td>218,000</td> <td>258,375</td> </tr> <tr> <td>Increase in Population</td> <td>N/A</td> <td>40,375</td> </tr> </tbody> </table> <p><b>Amended Table 2.7</b></p> <table border="1" data-bbox="922 584 1599 785"> <thead> <tr> <th></th> <th>2016</th> <th><u>Q1 2028 – RSES High Growth Scenario</u></th> </tr> </thead> <tbody> <tr> <td>Population</td> <td>218,000</td> <td><u>256,125</u> <del>258,375</del></td> </tr> <tr> <td>Increase in Population</td> <td>N/A</td> <td><u>38,125</u> <del>40,375</del></td> </tr> </tbody> </table> <p>Amend the second paragraph of Section 2.4.5 ‘Strategic Land Reserve’ as follows:</p> <p><i>In accordance with the infrastructure assessment of Tier 2 zoned residential lands (see Appendix 1) the full build-out of existing residential zoned land at Old Connaught is incorporated into the Core Strategy for the Plan period 2022-2028. Part of the 3,500 allocation is thus subsumed into the delivery of existing zoned land at Old Connaught up to 2028. To provide for the residual population allocated under NPO 68 the strategic land reserve reflects the period <del>2029</del> <u>Q2 2028</u> to 2031 which equates to an additional <del>2,100</del> <u>2,625</u> persons or approx. <del>840</del> <u>1050</u> residential units (average household size estimated at 2.5).</i></p> <p>Amend Table 2.11: Strategic Land Reserve as follows:</p> <p>Existing Table 2.11</p>		2016	2028 – RSES High Growth Scenario	Population	218,000	258,375	Increase in Population	N/A	40,375		2016	<u>Q1 2028 – RSES High Growth Scenario</u>	Population	218,000	<u>256,125</u> <del>258,375</del>	Increase in Population	N/A	<u>38,125</u> <del>40,375</del>
	2016	2028 – RSES High Growth Scenario																	
Population	218,000	258,375																	
Increase in Population	N/A	40,375																	
	2016	<u>Q1 2028 – RSES High Growth Scenario</u>																	
Population	218,000	<u>256,125</u> <del>258,375</del>																	
Increase in Population	N/A	<u>38,125</u> <del>40,375</del>																	

Observations, Submissions and Recommendations	Executive’s Response & Recommendation																
	<p><b>Table 2.11: Strategic Land Reserve</b></p> <table border="1" data-bbox="922 320 1408 475"> <thead> <tr> <th>Location</th> <th>Hectares</th> <th>Potential Residential Yield</th> <th>Potential Phasing</th> </tr> </thead> <tbody> <tr> <td>Old Connaught North</td> <td>38</td> <td>c. 840 units</td> <td>Post 2028</td> </tr> </tbody> </table> <p>Amended Table 2.11</p> <table border="1" data-bbox="922 555 1637 687"> <thead> <tr> <th><i>Location</i></th> <th><i>Hectares</i></th> <th><i>Potential Residential Yield</i></th> <th><i>Potential Phasing</i></th> </tr> </thead> <tbody> <tr> <td><i>Old Connaught North</i></td> <td><i>38</i></td> <td><i>c. <del>840</del> 1050 units</i></td> <td><i>Post <u>Q1</u> 2028</i></td> </tr> </tbody> </table> <p>Amend the second paragraph in Section 2.4.8.4 ‘Demand for Employment Zoned Lands’ as follows:</p> <p><i>The estimation of employment zoned land and the quantum of commercial development envisaged is determined primarily through the labour force projection for the County. It is possible to arrive at a labour force projection by considering the projected population growth, the projected labour force participation rate of the new population, and the projected jobs ratio, i.e. how many jobs are likely to be located within the County based on the relative size of the labour force. The population growth projection of <del>40,375</del> <u>38,125</u> persons (see Section 2.3.2 above) is informed by the provisions of the NPF and RSES and provides the basis for calculating the future labour force. For the purpose of the analysis the 2016 labour force participation rate of 58% is assumed to increase to 60% on the assumption of a slight increase in the working population in the County, while the current positive jobs ratio of 0.9 is assumed to be maintained.</i></p> <p>Amend ‘Table 2.13: Jobs Forecast’ as follows:</p> <p>Existing Table 2.13</p>	Location	Hectares	Potential Residential Yield	Potential Phasing	Old Connaught North	38	c. 840 units	Post 2028	<i>Location</i>	<i>Hectares</i>	<i>Potential Residential Yield</i>	<i>Potential Phasing</i>	<i>Old Connaught North</i>	<i>38</i>	<i>c. <del>840</del> 1050 units</i>	<i>Post <u>Q1</u> 2028</i>
Location	Hectares	Potential Residential Yield	Potential Phasing														
Old Connaught North	38	c. 840 units	Post 2028														
<i>Location</i>	<i>Hectares</i>	<i>Potential Residential Yield</i>	<i>Potential Phasing</i>														
<i>Old Connaught North</i>	<i>38</i>	<i>c. <del>840</del> 1050 units</i>	<i>Post <u>Q1</u> 2028</i>														

Observations, Submissions and Recommendations	Executive’s Response & Recommendation																				
	<p><b>Table 2.13: Jobs Forecast</b></p> <table border="1"> <tr> <td>Population Projection 2016-2028</td> <td>40,375</td> </tr> <tr> <td>Minus % of Population Aged under 15 Years (18%)</td> <td>33,108</td> </tr> <tr> <td>Labour Force Participation Rate (60%)</td> <td>19,865</td> </tr> <tr> <td>Jobs Ratio (0.9)</td> <td>17,878</td> </tr> <tr> <td>DLR Additional Jobs Forecast</td> <td>17,878</td> </tr> </table> <p><b>Amended Table 2.13</b></p> <table border="1"> <tr> <td><del>Population Projection 2016-2028</del></td> <td><del>40,375</del> <u>38,125</u></td> </tr> <tr> <td><del>Minus % of Population Aged under 15 Years (18%)</del></td> <td><del>33,108</del> <u>31,263</u></td> </tr> <tr> <td><del>Labour Force Participation Rate (60%)</del></td> <td><del>19,865</del> <u>18,758</u></td> </tr> <tr> <td><del>Jobs Ratio (0.9)</del></td> <td><del>17,878</del> <u>16,882</u></td> </tr> <tr> <td><del>DLR Additional Jobs Forecast</del></td> <td><del>17,878</del> <u>16,882</u></td> </tr> </table> <p><b>OPR Recommendation 1(b)</b>            Having regard to the issuing of section 28 Housing Supply Targets Methodology for Development Planning Guidelines for Planning Authorities (December 2020) at the end stage of the preparation of the Draft Plan, and to the apparent significant over-estimate of housing units provided for under the draft core strategy, the planning authority is required to review the core strategy to ensure consistency with the aforementioned guidelines.</p> <p><b>OPR Recommendation 1(b): Executive’s Response</b>            The Local Authority notes the significant emphasis placed by the OPR on the recently published Section 28 Guidelines – ‘Housing Supply Target Methodology for Development Planning’ (2020) (HST Guidelines). It is highlighted that these Guidelines were published on the same day the Draft DLR County Development Plan was agreed by the Elected Members of DLR County Council - 18<sup>th</sup> December 2020 - and as such did not inform</p>	Population Projection 2016-2028	40,375	Minus % of Population Aged under 15 Years (18%)	33,108	Labour Force Participation Rate (60%)	19,865	Jobs Ratio (0.9)	17,878	DLR Additional Jobs Forecast	17,878	<del>Population Projection 2016-2028</del>	<del>40,375</del> <u>38,125</u>	<del>Minus % of Population Aged under 15 Years (18%)</del>	<del>33,108</del> <u>31,263</u>	<del>Labour Force Participation Rate (60%)</del>	<del>19,865</del> <u>18,758</u>	<del>Jobs Ratio (0.9)</del>	<del>17,878</del> <u>16,882</u>	<del>DLR Additional Jobs Forecast</del>	<del>17,878</del> <u>16,882</u>
Population Projection 2016-2028	40,375																				
Minus % of Population Aged under 15 Years (18%)	33,108																				
Labour Force Participation Rate (60%)	19,865																				
Jobs Ratio (0.9)	17,878																				
DLR Additional Jobs Forecast	17,878																				
<del>Population Projection 2016-2028</del>	<del>40,375</del> <u>38,125</u>																				
<del>Minus % of Population Aged under 15 Years (18%)</del>	<del>33,108</del> <u>31,263</u>																				
<del>Labour Force Participation Rate (60%)</del>	<del>19,865</del> <u>18,758</u>																				
<del>Jobs Ratio (0.9)</del>	<del>17,878</del> <u>16,882</u>																				
<del>DLR Additional Jobs Forecast</del>	<del>17,878</del> <u>16,882</u>																				

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
	<p>the preparation of the Draft County Development Plan. These new Guidelines were issued c. 3 years after the publication of the NPF and c. 18 months after the publication of the RSES, at a point in time where, as required by statute, the Local Authority are at an advanced stage in the plan-making process. It is considered that this timing causes challenges for all stakeholders in the plan-making process.</p> <p>The Local Authority would highlight the requirement set out in the OPR’s submission to ‘...<i>ensure consistency with population targets in the NPF Roadmap and with the housing supply targets as required under the section 28 Housing Supply Targets Methodology for Development Planning Guidelines for Planning Authorities</i>’. It is considered that this request to ‘ensure consistency’ is inconsistent with and exceeds the stated provisions of the HST Guidelines, which allow for a greater degree of flexibility for Plans that are at a more advanced stage of the Plan making process. In this regard, the Local Authority notes the contents of Section 2.12 of the HST Guidelines:</p> <p><i>‘As part of the development plan process, planning authorities must demonstrate the manner in which their core strategy and other elements of the plan are consistent with the established NPF Roadmap population projections for their local authority area and accordingly, with the related NPF 50:50 City housing demand projection scenario identified by the ERSI. While it is recognised that certain planning authorities may have advanced through the statutory process, including publication of a Draft Plan, it will be necessary to demonstrate general consistency with the NPF and ESRI NPF housing demand scenario, including at Chief Executives Report and at Material Alterations stages, subject to the methodology set out in Section 4.0 of these guidelines below, and within the parameters of potential adjustment to 2026.’</i></p> <p>As noted above, the Draft County Development Plan was agreed by the Elected Members on the same day the HST Guidelines were published, and as such the only feasible mechanism to take account of the new Guidelines is through the amendment of the Draft Plan at Chief Executive’s Report stage. The Local Authority are thus of the opinion that the OPR’s requirement to ‘ensure consistency’ exceeds the stated requirements in the HST Guidelines which provides a lower threshold and requirement to ‘demonstrate general consistency’.</p> <p>Section 4 of the HST Guidelines includes a methodology and table for projecting new household demand for the plan period. It is recommended that the completed HST Table and associated explanatory text is incorporated into the Draft Plan in a new Section 2.3.6.5 ‘Housing Supply Target Methodology for Development Planning’.</p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation																														
	<p>The following Table comprises the Housing Supply Target Table, as relevant to DLR, for inclusion and relates to the operational period of the County Development Plan - Q2 2022 to Q1 2028. Row B of the Table incorporates CSO dwelling completions for the years 2017 to Q1 2021. For the timeframe prior to the Plan becoming operational, the HST Guidelines provides that estimates of delivery should be projected pro rata. For the period Q2 2021 to Q1 2022 the Housing Supply Target Table assumes an estimate of housing completions based on an average of the eight Quarters from Q2 2019 to Q1 2021.</p> <table border="1" data-bbox="913 512 2051 1241"> <thead> <tr> <th colspan="2" data-bbox="913 512 1449 587">Dún Laoghaire-Rathdown</th> <th data-bbox="1449 512 1749 587">Annual Average Households</th> <th data-bbox="1749 512 2051 587">Total Households</th> </tr> </thead> <tbody> <tr> <td data-bbox="913 587 976 655"><b>A</b></td> <td data-bbox="976 587 1449 655">ESRI NPF scenario projected new household demand 2017 to Q1 2028</td> <td data-bbox="1449 587 1749 655">1798 (20223/11.25)</td> <td data-bbox="1749 587 2051 655">20223</td> </tr> <tr> <td data-bbox="913 655 976 756"><b>B</b></td> <td data-bbox="976 655 1449 756">CSO dwelling completions Q1 2017 to Q1 2021 + Estimated completions Q2 2021 to Q1 2022</td> <td data-bbox="1449 655 1749 756">1046 (4554+938/5.25)</td> <td data-bbox="1749 655 2051 756">5492</td> </tr> <tr> <td data-bbox="913 756 976 831"><b>C</b></td> <td data-bbox="976 756 1449 831">Homeless households (latest data), and unmet demand as at most recent Census</td> <td data-bbox="1449 756 1749 831">N/A</td> <td data-bbox="1749 756 2051 831">494</td> </tr> <tr> <td data-bbox="913 831 976 943"><b>D</b></td> <td data-bbox="976 831 1449 943">Plan Housing Demand = Total (A-B+C) ((Projected ESRI NPF demand - new completions) + Unmet demand)</td> <td data-bbox="1449 831 1749 943">2538 (15225/6)</td> <td data-bbox="1749 831 2051 943"><b>15,225</b> ((20223 - 5492) + 494)</td> </tr> <tr> <td data-bbox="913 943 976 1075"><b>E</b></td> <td data-bbox="976 943 1449 1075">Potential adjustment 1 to end 2026 portion of plan period to facilitate convergence to NPF strategy (where justified)</td> <td data-bbox="1449 943 1749 1075">Mid-point between ESRI NPF and baseline scenarios to 2026 in lieu of A above.</td> <td data-bbox="1749 943 2051 1075">Not Applicable</td> </tr> <tr> <td data-bbox="913 1075 976 1241"><b>F</b></td> <td data-bbox="976 1075 1449 1241">Potential adjustment 2 to end 2026 portion of plan period to facilitate convergence to NPF strategy, applicable where B exceeds or is close to D (where justified)</td> <td data-bbox="1449 1075 1749 1241">Mid-point between ESRI NPF and baseline scenarios to 2026 in lieu of A above, plus up to 25%</td> <td data-bbox="1749 1075 2051 1241">Not Applicable</td> </tr> </tbody> </table> <p data-bbox="913 1278 2051 1380">The Housing Supply Target for DLR calculated through the new HST Guidelines comprises 15,225 homes. On the face of it, this would appear to be significantly less than the housing target calculated in the Core Strategy of the Draft Plan which makes provision for 20,669 homes (see Table 2.7). It is highlighted, however, that</p>			Dún Laoghaire-Rathdown		Annual Average Households	Total Households	<b>A</b>	ESRI NPF scenario projected new household demand 2017 to Q1 2028	1798 (20223/11.25)	20223	<b>B</b>	CSO dwelling completions Q1 2017 to Q1 2021 + Estimated completions Q2 2021 to Q1 2022	1046 (4554+938/5.25)	5492	<b>C</b>	Homeless households (latest data), and unmet demand as at most recent Census	N/A	494	<b>D</b>	Plan Housing Demand = Total (A-B+C) ((Projected ESRI NPF demand - new completions) + Unmet demand)	2538 (15225/6)	<b>15,225</b> ((20223 - 5492) + 494)	<b>E</b>	Potential adjustment 1 to end 2026 portion of plan period to facilitate convergence to NPF strategy (where justified)	Mid-point between ESRI NPF and baseline scenarios to 2026 in lieu of A above.	Not Applicable	<b>F</b>	Potential adjustment 2 to end 2026 portion of plan period to facilitate convergence to NPF strategy, applicable where B exceeds or is close to D (where justified)	Mid-point between ESRI NPF and baseline scenarios to 2026 in lieu of A above, plus up to 25%	Not Applicable
Dún Laoghaire-Rathdown		Annual Average Households	Total Households																												
<b>A</b>	ESRI NPF scenario projected new household demand 2017 to Q1 2028	1798 (20223/11.25)	20223																												
<b>B</b>	CSO dwelling completions Q1 2017 to Q1 2021 + Estimated completions Q2 2021 to Q1 2022	1046 (4554+938/5.25)	5492																												
<b>C</b>	Homeless households (latest data), and unmet demand as at most recent Census	N/A	494																												
<b>D</b>	Plan Housing Demand = Total (A-B+C) ((Projected ESRI NPF demand - new completions) + Unmet demand)	2538 (15225/6)	<b>15,225</b> ((20223 - 5492) + 494)																												
<b>E</b>	Potential adjustment 1 to end 2026 portion of plan period to facilitate convergence to NPF strategy (where justified)	Mid-point between ESRI NPF and baseline scenarios to 2026 in lieu of A above.	Not Applicable																												
<b>F</b>	Potential adjustment 2 to end 2026 portion of plan period to facilitate convergence to NPF strategy, applicable where B exceeds or is close to D (where justified)	Mid-point between ESRI NPF and baseline scenarios to 2026 in lieu of A above, plus up to 25%	Not Applicable																												

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
	<p>these housing targets are neither equivalent or commensurate and do not represent a like for like comparison. The primary differentials relate to: how the two years prior to the Plan becoming operational are assessed; and, the population figure being utilised to underpin each respective housing target. To allow for a comparison of general consistency, as required under the HST Guidelines, both of these factors need to be further considered.</p> <p><i><u>Housing Target of the Draft County Development Plan</u></i></p> <p>The housing target in the Core Strategy (see Table 2.7) is calculated based on population growth for the period 2020 – 2028 – an eight-year period rather than a six-year period. The purpose of this approach is to align with the Residential Development Capacity Audit (RDCA) which was prepared at year end 2019. The RDCA is required to be prepared early in the plan-making process in order to inform the Draft Core Strategy at Pre-Draft stage – Section 11(4)(d) of the Planning and Development Act, 2000 (as amended) refers.</p> <p>The housing target and residential yield in the Core Strategy thus incorporates both population and residential units / land for the two years prior to the Plan becoming operational. The methodology utilised in the Draft Core Strategy assumes that population growth for the two years prior to Plan becoming operational would be offset by a corresponding reduction in land availability / residential yield – with any unmet supply being retained as part of the housing target for the plan period.</p> <p>The Housing Supply Target methodology from the HST Guidelines applies a different methodology whereby the calculation of the housing target incorporates estimates of housing completions for the period prior to the Plan becoming operational. These housing estimates are subtracted from the overall housing target. The housing target from the HST Guidelines thus equates to the six-year plan period only.</p> <p>In order to better correspond with the methodology applied in the HST Guidelines, and to enable a comparison of general consistency, it is recommended that the following amendments are made to the Draft Core Strategy (full details set out at the end of this section):</p> <ul style="list-style-type: none"> <li>• Revise Table 2.7 ‘Core Strategy Housing Target’ to incorporate updated housing completion data (Q1 2020 to Q1 2021) and estimates of housing completion data (Q2 2021 to Q1 2022).</li> <li>• Apply a corresponding reduction in the housing target in Table 2.7.</li> <li>• Apply a corresponding reduction to the residential yield in the RDCA set out in Table 2.8.</li> </ul>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation								
	<p>When the housing target of the Draft Core Strategy is discounted by actual / estimated completions between Q1 2020 and Q1 2022, the adjusted housing target equates to 18,515 homes. The following Table compares the adjusted housing target for the Core Strategy with the housing target calculated from the HST Guidelines. There is a difference of c. 3,300 homes between the two housing targets.</p> <table border="1" data-bbox="913 443 1742 603"> <tr> <td>DLR Core Strategy - Adjusted Housing Target</td> <td>18,515</td> </tr> <tr> <td>HST Guidelines - Housing Target</td> <td>15,225</td> </tr> <tr> <td>Difference</td> <td>3,290</td> </tr> <tr> <td>Percentage Difference</td> <td>21.3%</td> </tr> </table> <p>The second differential between the two methodologies required to be considered relates to the primary input in the calculation of a housing target – population. The Local Authority has particular concerns as to whether the 25% additional population ‘headroom’ allowance, as provided for in the NPF Roadmap and the RSES, and the additional 3,500 population allocation under NPO 68, were incorporated into the population allocation used to calculate the housing target under the HST Guidelines. It is noted that the relevant population figures which informed the housing target using the HST methodology were not published with the HST Guidelines. Section 2.1 of the HST Guidelines did however state the following:</p> <p><b><u>‘These established NPF Roadmap population projections for each County continue to be the population parameters for local authority development planning processes. City or County development plans must therefore plan for the identified population growth within these estimates and use them as the basis for strategic decision-making in their development plan process, including its core strategy, settlement strategy and housing policies.’</u></b></p> <p>As per the above extract, the HST Guidelines re-affirm the position that the Core Strategy of the County Development Plan must plan for the identified population growth estimates of the NPF Roadmap and use them as the basis for strategic decision-making. Section 2.7 of the HST Guidelines notes that the NPF 50:50 City Scenario (the population scenario which underpins the HST Guidelines) ‘...is broadly consistent with the National Planning Framework strategy and consequently, the 2018 NPF ‘Roadmap’ document and the population parameters specified therein.’ Based on the qualitative commentary contained in the HST Guidelines it would be reasonable to assume the population figures applied are broadly consistent.</p>	DLR Core Strategy - Adjusted Housing Target	18,515	HST Guidelines - Housing Target	15,225	Difference	3,290	Percentage Difference	21.3%
DLR Core Strategy - Adjusted Housing Target	18,515								
HST Guidelines - Housing Target	15,225								
Difference	3,290								
Percentage Difference	21.3%								

Observations, Submissions and Recommendations	Executive’s Response & Recommendation																																								
	<p>Subsequent to the publication of the HST Guidelines, the population figures for the ‘NPF 50:50 City Scenario’ became available as a data source for separate national guidance - the DHLGH’s ‘Guidance on the Preparation of a Housing Need and Demand Assessment’. The publication of these population figures enables an analysis to be undertaken between the population projections as provided for in the NPF Roadmap with the NPF 50:50 City Scenario which informs the housing target calculated in the HST Guidelines.</p> <p>The following Table compares: the population figures for the four Dublin Local Authorities in 2026 as contained in Appendix B of the RSES; the RSES population allocations adjusted to incorporate the additional 25% population headroom allowance (NPF Roadmap); and the NPF 50:50 City population figures, which inform the housing target of the HST Guidelines.</p> <table border="1" data-bbox="913 675 2074 1273"> <thead> <tr> <th data-bbox="913 675 1052 810">Local Authority</th> <th data-bbox="1052 675 1202 810">2016</th> <th data-bbox="1202 675 1373 810">RSES 2026 (Low to High)</th> <th data-bbox="1373 675 1619 810">RSES 2026 (Low to High) – Additional 25% headroom applied</th> <th data-bbox="1619 675 1825 810">NPF 50:50 City Scenario 2026 – Section 28 Guidelines</th> <th data-bbox="1825 675 2074 810">Difference in Population based on RSES ‘headroom’ figures</th> </tr> </thead> <tbody> <tr> <td data-bbox="913 810 1052 983">DLR</td> <td data-bbox="1052 810 1202 983">218,000</td> <td data-bbox="1202 810 1373 983">241,000 – 245,500</td> <td data-bbox="1373 810 1619 983">246,750 – 252,375</td> <td data-bbox="1619 810 1825 983">250,347</td> <td data-bbox="1825 810 2074 983">Minus 2,028 in the high scenario – justified in the County Development Plan</td> </tr> <tr> <td data-bbox="913 983 1052 1054">Dublin City</td> <td data-bbox="1052 983 1202 1054">554,500</td> <td data-bbox="1202 983 1373 1054">613,000 – 625,000</td> <td data-bbox="1373 983 1619 1054">627,625 – 642,625</td> <td data-bbox="1619 983 1825 1054">625,023</td> <td data-bbox="1825 983 2074 1054">Minus 2,602 to 17,602</td> </tr> <tr> <td data-bbox="913 1054 1052 1126">Fingal</td> <td data-bbox="1052 1054 1202 1126">296,000</td> <td data-bbox="1202 1054 1373 1126">327,000 – 333,000</td> <td data-bbox="1373 1054 1619 1126">334,750 – 342,250</td> <td data-bbox="1619 1054 1825 1126">329,918</td> <td data-bbox="1825 1054 2074 1126">Minus 4,832 to 12,332</td> </tr> <tr> <td data-bbox="913 1126 1052 1198">South Dublin</td> <td data-bbox="1052 1126 1202 1198">279,000</td> <td data-bbox="1202 1126 1373 1198">308,000 – 314,000</td> <td data-bbox="1373 1126 1619 1198">315,250 – 322,750</td> <td data-bbox="1619 1126 1825 1198">312,600</td> <td data-bbox="1825 1126 2074 1198">Minus 2,650 to 10,150</td> </tr> <tr> <td data-bbox="913 1198 1052 1273">Total</td> <td data-bbox="1052 1198 1202 1273"><b>1,347,500</b></td> <td data-bbox="1202 1198 1373 1273"><b>1,489,000 – 1,517,500</b></td> <td data-bbox="1373 1198 1619 1273"><b>1,524,375 – 1,560,000</b></td> <td data-bbox="1619 1198 1825 1273"><b>1,517,888</b></td> <td data-bbox="1825 1198 2074 1273"><b>Minus 6,487 to 42,112</b></td> </tr> </tbody> </table>					Local Authority	2016	RSES 2026 (Low to High)	RSES 2026 (Low to High) – Additional 25% headroom applied	NPF 50:50 City Scenario 2026 – Section 28 Guidelines	Difference in Population based on RSES ‘headroom’ figures	DLR	218,000	241,000 – 245,500	246,750 – 252,375	250,347	Minus 2,028 in the high scenario – justified in the County Development Plan	Dublin City	554,500	613,000 – 625,000	627,625 – 642,625	625,023	Minus 2,602 to 17,602	Fingal	296,000	327,000 – 333,000	334,750 – 342,250	329,918	Minus 4,832 to 12,332	South Dublin	279,000	308,000 – 314,000	315,250 – 322,750	312,600	Minus 2,650 to 10,150	Total	<b>1,347,500</b>	<b>1,489,000 – 1,517,500</b>	<b>1,524,375 – 1,560,000</b>	<b>1,517,888</b>	<b>Minus 6,487 to 42,112</b>
Local Authority	2016	RSES 2026 (Low to High)	RSES 2026 (Low to High) – Additional 25% headroom applied	NPF 50:50 City Scenario 2026 – Section 28 Guidelines	Difference in Population based on RSES ‘headroom’ figures																																				
DLR	218,000	241,000 – 245,500	246,750 – 252,375	250,347	Minus 2,028 in the high scenario – justified in the County Development Plan																																				
Dublin City	554,500	613,000 – 625,000	627,625 – 642,625	625,023	Minus 2,602 to 17,602																																				
Fingal	296,000	327,000 – 333,000	334,750 – 342,250	329,918	Minus 4,832 to 12,332																																				
South Dublin	279,000	308,000 – 314,000	315,250 – 322,750	312,600	Minus 2,650 to 10,150																																				
Total	<b>1,347,500</b>	<b>1,489,000 – 1,517,500</b>	<b>1,524,375 – 1,560,000</b>	<b>1,517,888</b>	<b>Minus 6,487 to 42,112</b>																																				

Observations, Submissions and Recommendations	Executive’s Response & Recommendation																
	<p>The first deviation to note is that the statutory RSES population figures incorporate a high and low growth scenario whereas the NPF 50:50 City Scenario applies a single population figure. The difference in the range for the low to high growth scenarios for the Dublin Local Authorities in 2026 equates to 28,500 people.</p> <p>In overall terms, across the four Dublin Local Authorities, the population of the updated NPF 50:50 City Scenario in 2026 – 1,517,888 - aligns with the RSES unadjusted 2026 high growth scenario of 1,517,500. Importantly, however, when the additional 25% population headroom as provided for in the NPF Roadmap is added, the NPF 50:50 City Scenario is between c. 6,500 and c. 42,000 lower. In housing terms this difference could equate to over 18,000 homes – and the equivalent in land use zoning - across the four Dublin Local Authorities. On the basis of the above analysis, it would appear that the ‘NPF 50:50 City’ population figures underpinning the HST housing target do not factor in the additional population ‘headroom’ as provided for in the NPF Roadmap.</p> <p>NPO 68 of the NPF provides that a MASP may enable up to 20% of the phased population growth targeted in the principal city and suburban area, to be accommodated in the wider metropolitan area. In accordance with the NPF, the Elected Members of the Regional Assembly approved transitional population allowances for the Dublin MASP area at the July 2020 meeting of the EMRA.</p> <p>The approved population projections were applied to the 2031 high growth scenario of the RSES and are set out in the Table below (note – the figures in the Table below have <b>not</b> been amended to reflect population headroom). The Table compares the 2031 EMRA approved population figures with the 2031 NPF 50:50 City population scenario which underpins the housing target calculated from the HST Guidelines. There is a significant variance between the two sets of population figures – the EMRA approved population figures being more than 50,000 greater. The evidence would suggest that NPF 50:50 City population scenario which informs the household demand in the HST Guidelines doesn’t incorporate the approved transitional population allowances for the Dublin MASP area.</p> <table border="1" data-bbox="913 1166 1995 1358"> <thead> <tr> <th>Local Authority</th> <th>2031 – NPO 68 (EMRA Approved)</th> <th>NPF 50:50 City Scenario – HST Guidelines</th> <th>Difference</th> </tr> </thead> <tbody> <tr> <td>DLR</td> <td>260,500</td> <td>260,431</td> <td>Minus 69</td> </tr> <tr> <td>Dublin City</td> <td>655,000</td> <td>638,068</td> <td>Minus 16,932</td> </tr> <tr> <td>Fingal</td> <td>369,000</td> <td>339,306</td> <td>Minus 29,694</td> </tr> </tbody> </table>	Local Authority	2031 – NPO 68 (EMRA Approved)	NPF 50:50 City Scenario – HST Guidelines	Difference	DLR	260,500	260,431	Minus 69	Dublin City	655,000	638,068	Minus 16,932	Fingal	369,000	339,306	Minus 29,694
Local Authority	2031 – NPO 68 (EMRA Approved)	NPF 50:50 City Scenario – HST Guidelines	Difference														
DLR	260,500	260,431	Minus 69														
Dublin City	655,000	638,068	Minus 16,932														
Fingal	369,000	339,306	Minus 29,694														

Observations, Submissions and Recommendations	Executive’s Response & Recommendation			
	South Dublin	329,000	322,300	Minus 6,700
	Total	<b>1,613,500</b>	<b>1,560,105</b>	<b>Minus 53,395</b>
	<p>In response to the OPR’s <b>Recommendation 1(b)</b>, the Local Authority has reviewed the Core Strategy with respect to its calculation of the housing target and its consistency with the HST Guidelines. In response to this recommendation it is proposed to amend the housing target to reflect: an adjusted population allocation set out in response to <b>Recommendation 1(a)</b>; and, the incorporation of updated housing completions and estimates for housing completions pertaining to the period prior to the Plan becoming operational. These proposed amendments are set out in detail below and serve to reduce the housing target of the Core Strategy.</p> <p>The Local Authority has undertaken a detailed comparative analysis with respect to the housing target of the HST Guidelines – 15,225 homes – and the adjusted housing target of the Draft Plan – 18,515 homes. Based on the information available, the Planning Authority has demonstrated that the housing target of the HST Guidelines is not informed by the full range of population modifiers provided for in national and regional policy including population ‘headroom’ (NPF Roadmap and RSES) and additional population allowance provided for under NPO 68. It is considered that these factors are an important component in the deviation between the respective figures.</p> <p>When these factors are taken into consideration, the Executive are of the view that there is general consistency between the respective housing targets of the DLR Draft Core Strategy and the household demand figure calculated through the HST Guidelines.</p> <p><b>OPR Recommendation 1(b): Executive’s Recommendation</b>                      Include a new Section 2.3.6.5 ‘Housing Supply Target Methodology for Development Planning’ as follows:</p> <p><u><a href="#">2.3.6.5 Housing Supply Target Methodology for Development Planning</a></u></p> <p><u><a href="#">The Section 28 Guidelines ‘Housing Supply Target Methodology for Development Planning’ (2020) (HST Guidelines) are intended to assist in providing the required consistent and coherent approach to be taken by Planning Authorities in incorporating national and regional population and housing projections into their statutory functions. They are intended to assist Planning Authorities in appropriately integrating the strategic national and regional population parameters into their statutory planning processes, such as the preparation</a></u></p>			

Observations, Submissions and Recommendations	Executive’s Response & Recommendation																								
	<p><u>of the Development Plan and the preparation of the Housing Strategy, informed by the Housing Need and Demand Assessment process.</u></p> <p><u>In accordance with National Policy Objective 37 of the NPF, the Planning Authority is required to undertake a Housing Need Demand Assessment as part of its Housing Strategy. This is a new feature of the planning system that will need a consistent population and housing demand basis from which to effectively estimate the housing needs of the Local Authority. The HST Guidelines include a methodology to bridge the strategic national and regional population projections (contained within the NPF and RSES) to the Housing Need Demand Assessment. Table 2.X below sets out the methodology contained in the HST Guidelines as applicable to DLR and calculates household demand for the County pertaining to the 6-Year County Development Plan cycle only. The household demand figure provide in Table 2.X will inform the preparation of a HNDA to be prepared in conjunction with the other Dublin Local Authorities.</u></p> <p><u>Table 2.X: HST Guidelines - DLR Household Demand</u></p> <table border="1" data-bbox="913 740 2051 1305"> <thead> <tr> <th colspan="2" data-bbox="913 740 1451 810"><u>Dún Laoghaire-Rathdown</u></th> <th data-bbox="1451 740 1749 810"><u>Annual Average Households</u></th> <th data-bbox="1749 740 2051 810"><u>Total Households</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="913 810 981 887"><u>A</u></td> <td data-bbox="981 810 1451 887"><u>ESRI NPF scenario projected new household demand 2017 to Q1 2028</u></td> <td data-bbox="1451 810 1749 887"><u>1798 (20223/11.25)</u></td> <td data-bbox="1749 810 2051 887"><u>20223</u></td> </tr> <tr> <td data-bbox="913 887 981 986"><u>B</u></td> <td data-bbox="981 887 1451 986"><u>CSO dwelling completions Q1 2017 to Q1 2021 + Estimated completions Q2 2021 to Q1 2022</u></td> <td data-bbox="1451 887 1749 986"><u>1046 (4554+938/5.25)</u></td> <td data-bbox="1749 887 2051 986"><u>5492</u></td> </tr> <tr> <td data-bbox="913 986 981 1062"><u>C</u></td> <td data-bbox="981 986 1451 1062"><u>Homeless households (latest data), and unmet demand as at most recent Census</u></td> <td data-bbox="1451 986 1749 1062"><u>N/A</u></td> <td data-bbox="1749 986 2051 1062"><u>494</u></td> </tr> <tr> <td data-bbox="913 1062 981 1174"><u>D</u></td> <td data-bbox="981 1062 1451 1174"><u>Plan Housing Demand = Total (A-B+C) ((Projected ESRI NPF demand - new completions) + Unmet demand)</u></td> <td data-bbox="1451 1062 1749 1174"><u>2538 (15225/6)</u></td> <td data-bbox="1749 1062 2051 1174"><u>15,225 ((20223 - 5492) + 494)</u></td> </tr> <tr> <td data-bbox="913 1174 981 1305"><u>E</u></td> <td data-bbox="981 1174 1451 1305"><u>Potential adjustment 1 to end 2026 portion of plan period to facilitate convergence to NPF strategy (where justified)</u></td> <td data-bbox="1451 1174 1749 1305"><u>Mid-point between ESRI NPF and baseline scenarios to 2026 in lieu of A above.</u></td> <td data-bbox="1749 1174 2051 1305"><u>Not Applicable</u></td> </tr> </tbody> </table>	<u>Dún Laoghaire-Rathdown</u>		<u>Annual Average Households</u>	<u>Total Households</u>	<u>A</u>	<u>ESRI NPF scenario projected new household demand 2017 to Q1 2028</u>	<u>1798 (20223/11.25)</u>	<u>20223</u>	<u>B</u>	<u>CSO dwelling completions Q1 2017 to Q1 2021 + Estimated completions Q2 2021 to Q1 2022</u>	<u>1046 (4554+938/5.25)</u>	<u>5492</u>	<u>C</u>	<u>Homeless households (latest data), and unmet demand as at most recent Census</u>	<u>N/A</u>	<u>494</u>	<u>D</u>	<u>Plan Housing Demand = Total (A-B+C) ((Projected ESRI NPF demand - new completions) + Unmet demand)</u>	<u>2538 (15225/6)</u>	<u>15,225 ((20223 - 5492) + 494)</u>	<u>E</u>	<u>Potential adjustment 1 to end 2026 portion of plan period to facilitate convergence to NPF strategy (where justified)</u>	<u>Mid-point between ESRI NPF and baseline scenarios to 2026 in lieu of A above.</u>	<u>Not Applicable</u>
<u>Dún Laoghaire-Rathdown</u>		<u>Annual Average Households</u>	<u>Total Households</u>																						
<u>A</u>	<u>ESRI NPF scenario projected new household demand 2017 to Q1 2028</u>	<u>1798 (20223/11.25)</u>	<u>20223</u>																						
<u>B</u>	<u>CSO dwelling completions Q1 2017 to Q1 2021 + Estimated completions Q2 2021 to Q1 2022</u>	<u>1046 (4554+938/5.25)</u>	<u>5492</u>																						
<u>C</u>	<u>Homeless households (latest data), and unmet demand as at most recent Census</u>	<u>N/A</u>	<u>494</u>																						
<u>D</u>	<u>Plan Housing Demand = Total (A-B+C) ((Projected ESRI NPF demand - new completions) + Unmet demand)</u>	<u>2538 (15225/6)</u>	<u>15,225 ((20223 - 5492) + 494)</u>																						
<u>E</u>	<u>Potential adjustment 1 to end 2026 portion of plan period to facilitate convergence to NPF strategy (where justified)</u>	<u>Mid-point between ESRI NPF and baseline scenarios to 2026 in lieu of A above.</u>	<u>Not Applicable</u>																						

Observations, Submissions and Recommendations	Executive’s Response & Recommendation																													
	<p><i>F</i> <u>Potential adjustment 2 to end 2026 portion of plan period to facilitate convergence to NPF strategy, applicable where B exceeds or is close to D (where justified)</u></p>	<p><u>Mid-point between ESRI NPF and baseline scenarios to 2026 in lieu of A above, plus up to 25%</u></p>	<p><u>Not Applicable</u></p>																											
<p>Amend Tables 2.7, 2.8 and 2.10 and associated text of the Draft Plan to reflect updated population figures proposed to be incorporated in response to <b>Recommendation 1(a)</b> i.e. up to Q1 2028 only, updated housing completion data (Q1 2020 to Q1 2021) and estimates of housing completion data (Q2 2021 to Q1 2022).</p> <p>Existing Table 2.7</p> <p>Table 2.7: Core Strategy Housing Target</p> <table border="1" data-bbox="920 683 1393 1209"> <thead> <tr> <th></th> <th>2016</th> <th>2028 – RSES High Growth Scenario</th> </tr> </thead> <tbody> <tr> <td>Population</td> <td>218,000</td> <td>258,375</td> </tr> <tr> <td>Increase in Population</td> <td>N/A</td> <td>40,375</td> </tr> <tr> <td>Total Housing Stock</td> <td>86,962</td> <td>111,944</td> </tr> <tr> <td>Housing Target (2016-2028)</td> <td>N/A</td> <td>24,982</td> </tr> <tr> <td>Minus CSO Housing Completions (Q2 2016 – Q4 2019)</td> <td>N/A</td> <td>4,313</td> </tr> <tr> <td>Housing Target (2020-2028)</td> <td>N/A</td> <td>20,669</td> </tr> </tbody> </table> <p>Amended Table 2.7</p> <p>Table 2.7: Core Strategy Housing Target</p> <table border="1" data-bbox="920 1350 2013 1390"> <thead> <tr> <th></th> <th>2016</th> <th>Q1 2028 – RSES High Growth Scenario</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> </tr> </tbody> </table>					2016	2028 – RSES High Growth Scenario	Population	218,000	258,375	Increase in Population	N/A	40,375	Total Housing Stock	86,962	111,944	Housing Target (2016-2028)	N/A	24,982	Minus CSO Housing Completions (Q2 2016 – Q4 2019)	N/A	4,313	Housing Target (2020-2028)	N/A	20,669		2016	Q1 2028 – RSES High Growth Scenario			
	2016	2028 – RSES High Growth Scenario																												
Population	218,000	258,375																												
Increase in Population	N/A	40,375																												
Total Housing Stock	86,962	111,944																												
Housing Target (2016-2028)	N/A	24,982																												
Minus CSO Housing Completions (Q2 2016 – Q4 2019)	N/A	4,313																												
Housing Target (2020-2028)	N/A	20,669																												
	2016	Q1 2028 – RSES High Growth Scenario																												

Observations, Submissions and Recommendations	Executive’s Response & Recommendation		
	<b>Population</b>	218,000	<del>258,375</del> <u>256,125</u>
	<b>Increase in Population</b>	N/A	<del>40,375</del> <u>38,125</u>
	<b>Total Housing Stock</b>	86,962	<del>111,944</del> <u>110,969</u>
	<b>Housing Target (<del>2017</del> <u>2016</u> - <u>Q1 2028</u>)</b>	N/A	<del>24,982</del> <u>24,007</u>
	<b>Minus CSO Housing Completions (<del>Q2 2016 – Q4 2019</del>) (<u>2017 – Q1 2021</u>) + <u>Estimated Completions Q2 2021 – Q1 2022</u>)</b>	N/A	<del>4,313</del> <u>5,492</u>
	<b>Housing Target (<del>2020 to 2028</del>) (<u>Q2 2022 - Q1 2028</u>)</b>	N/A	<del>20,669</del> <u>18,515</u>
	Amend the associated text in Section 2.3.6.4 as follows:		
<i>Table 2.7 details the housing target for the Core Strategy up to <del>the year</del> <u>Q1 2028</u>. Based on the high growth scenario of the RSES there is a requirement for an additional <del>20,669</del> <u>18,515</u> residential units. The housing target is informed by and aligned with the population projections provided for in the RSES and is calculated based on the assumptions detailed above.</i>			
Existing Table 2.8			

Observations, Submissions and Recommendations	Executive’s Response & Recommendation																																																																
	<p data-bbox="927 288 1379 363"><b>Table 2.8:</b> <i>DLR Residential Development Capacity Audit – Aggregate Data (Accurate as of Q4 2019)</i></p> <table border="1" data-bbox="927 376 1406 935"> <thead> <tr> <th>Location</th> <th>Hectares</th> <th>Potential Residential Yield</th> <th>Zoning Tier</th> </tr> </thead> <tbody> <tr> <td>Infill/Windfall</td> <td>165.86</td> <td>4,571<sup>5</sup></td> <td>Tier 1 and Tier 2</td> </tr> <tr> <td>Ballyogan &amp; Environs</td> <td>71.8</td> <td>4,147</td> <td>Tier 1 and Tier 2</td> </tr> <tr> <td>Woodbrook-Shanganagh</td> <td>29.53</td> <td>1,998</td> <td>Tier 1 and Tier 2</td> </tr> <tr> <td>Kiltiernan-Glenamuck</td> <td>59.34</td> <td>2,015</td> <td>Tier 1 and Tier 2</td> </tr> <tr> <td>Old Connaught</td> <td>50.13</td> <td>2,005</td> <td>Tier 2</td> </tr> <tr> <td>Rathmichael</td> <td>83.05</td> <td>2,431</td> <td>Tier 2</td> </tr> <tr> <td>Cherrywood</td> <td>93.55</td> <td>5,596 - 8,186</td> <td>Tier 1 and Tier 2</td> </tr> <tr> <td><b>Total</b></td> <td><b>553.28</b></td> <td><b>22,763 - 25,353</b></td> <td></td> </tr> </tbody> </table> <p data-bbox="913 983 1128 1010">Amended Table 2.8</p> <table border="1" data-bbox="913 1043 2011 1353"> <thead> <tr> <th><i>Location</i></th> <th><i>Hectares</i></th> <th><i>Potential Residential Yield</i></th> <th><i>Zoning Tier</i></th> </tr> </thead> <tbody> <tr> <td><i>Infill/Windfall</i></td> <td><i>165.86</i></td> <td><i>4,571</i></td> <td><i>Tier 1 and Tier 2</i></td> </tr> <tr> <td><i>Ballyogan &amp; Environs</i></td> <td><i>71.8</i></td> <td><i>4,147</i></td> <td><i>Tier 1 and Tier 2</i></td> </tr> <tr> <td><i>Woodbrook-Shanganagh</i></td> <td><i>29.53</i></td> <td><i>1,998</i></td> <td><i>Tier 1 and Tier 2</i></td> </tr> <tr> <td><i>Kiltiernan-Glenamuck</i></td> <td><i>59.34</i></td> <td><i>2,015</i></td> <td><i>Tier 1 and Tier 2</i></td> </tr> <tr> <td><i>Old Connaught</i></td> <td><i>50.13</i></td> <td><i>2,005</i></td> <td><i>Tier 2</i></td> </tr> <tr> <td><i>Rathmichael</i></td> <td><i>83.05</i></td> <td><i>2,431</i></td> <td><i>Tier 2</i></td> </tr> </tbody> </table>	Location	Hectares	Potential Residential Yield	Zoning Tier	Infill/Windfall	165.86	4,571 <sup>5</sup>	Tier 1 and Tier 2	Ballyogan & Environs	71.8	4,147	Tier 1 and Tier 2	Woodbrook-Shanganagh	29.53	1,998	Tier 1 and Tier 2	Kiltiernan-Glenamuck	59.34	2,015	Tier 1 and Tier 2	Old Connaught	50.13	2,005	Tier 2	Rathmichael	83.05	2,431	Tier 2	Cherrywood	93.55	5,596 - 8,186	Tier 1 and Tier 2	<b>Total</b>	<b>553.28</b>	<b>22,763 - 25,353</b>		<i>Location</i>	<i>Hectares</i>	<i>Potential Residential Yield</i>	<i>Zoning Tier</i>	<i>Infill/Windfall</i>	<i>165.86</i>	<i>4,571</i>	<i>Tier 1 and Tier 2</i>	<i>Ballyogan &amp; Environs</i>	<i>71.8</i>	<i>4,147</i>	<i>Tier 1 and Tier 2</i>	<i>Woodbrook-Shanganagh</i>	<i>29.53</i>	<i>1,998</i>	<i>Tier 1 and Tier 2</i>	<i>Kiltiernan-Glenamuck</i>	<i>59.34</i>	<i>2,015</i>	<i>Tier 1 and Tier 2</i>	<i>Old Connaught</i>	<i>50.13</i>	<i>2,005</i>	<i>Tier 2</i>	<i>Rathmichael</i>	<i>83.05</i>	<i>2,431</i>	<i>Tier 2</i>
Location	Hectares	Potential Residential Yield	Zoning Tier																																																														
Infill/Windfall	165.86	4,571 <sup>5</sup>	Tier 1 and Tier 2																																																														
Ballyogan & Environs	71.8	4,147	Tier 1 and Tier 2																																																														
Woodbrook-Shanganagh	29.53	1,998	Tier 1 and Tier 2																																																														
Kiltiernan-Glenamuck	59.34	2,015	Tier 1 and Tier 2																																																														
Old Connaught	50.13	2,005	Tier 2																																																														
Rathmichael	83.05	2,431	Tier 2																																																														
Cherrywood	93.55	5,596 - 8,186	Tier 1 and Tier 2																																																														
<b>Total</b>	<b>553.28</b>	<b>22,763 - 25,353</b>																																																															
<i>Location</i>	<i>Hectares</i>	<i>Potential Residential Yield</i>	<i>Zoning Tier</i>																																																														
<i>Infill/Windfall</i>	<i>165.86</i>	<i>4,571</i>	<i>Tier 1 and Tier 2</i>																																																														
<i>Ballyogan &amp; Environs</i>	<i>71.8</i>	<i>4,147</i>	<i>Tier 1 and Tier 2</i>																																																														
<i>Woodbrook-Shanganagh</i>	<i>29.53</i>	<i>1,998</i>	<i>Tier 1 and Tier 2</i>																																																														
<i>Kiltiernan-Glenamuck</i>	<i>59.34</i>	<i>2,015</i>	<i>Tier 1 and Tier 2</i>																																																														
<i>Old Connaught</i>	<i>50.13</i>	<i>2,005</i>	<i>Tier 2</i>																																																														
<i>Rathmichael</i>	<i>83.05</i>	<i>2,431</i>	<i>Tier 2</i>																																																														

Observations, Submissions and Recommendations	Executive’s Response & Recommendation			
	<b>Cherrywood</b>	93.55	5,596 - 8,186	Tier 1 and Tier 2
	<b>Total</b>	553.28	22,763 - 25,353	
	<b><u>Less Actual / Estimated Completions Q1 2020 to Q1 2022 (Inclusive)</u></b>		<u>1,877</u>	
	<b><u>Adjusted Total</u></b>		<u>20,886 – 23,476</u>	
	<p>Amend the associated text in the first paragraph of Section 2.3.7.1 as follows:</p> <p><i>The Residential Development Capacity Audit estimated that <u>at Q4 2019</u> there were approximately 553 hectares of zoned land in the County which is, or may become available, for residential development. This comprises a reduction of c. 90 hectares from the housing land availability audit which informed the 2016 County Development Plan. The zoned land equates to a potential yield of between 22,763 and 25,353 residential units. <u>When actual and estimated completions for the period Q1 2020 to Q1 2022 are taken into consideration it is estimated that there is a potential residential yield of between c. 20,886 to 23,476 homes.</u> The Cherrywood Strategic Development Zone comprises a significant proportion of this total with an estimated residential yield of between 5,596 to 8,186 units.</i></p> <p>Existing Table 2.10</p>			

Observations, Submissions and Recommendations	Executive’s Response & Recommendation																																																																																																		
	<p><b>Table 2.10: Core Strategy Table</b></p> <table border="1"> <thead> <tr> <th style="background-color: #006699; color: white;">Location</th> <th style="background-color: #006699; color: white;">RDCA Existing Zoning (Ha)</th> <th style="background-color: #006699; color: white;">RDCA Existing Residential Yield</th> <th style="background-color: #006699; color: white;">CDP 2022-2028 Proposed Zoning (Ha)</th> <th style="background-color: #006699; color: white;">CDP 2022–2028 Proposed Residential Yield</th> </tr> </thead> <tbody> <tr><td>Infill/Windfall</td><td>165.86</td><td>4,571</td><td>165.86</td><td>4,571</td></tr> <tr><td>Ballyogan &amp; Environs</td><td>71.8</td><td>4,147</td><td>71.8</td><td>4,147</td></tr> <tr><td>Woodbrook-Shanganagh</td><td>29.53</td><td>1,998</td><td>29.53</td><td>1,998</td></tr> <tr><td>Kiltiernan-Glenamuck</td><td>59.34</td><td>2,015</td><td>59.34</td><td>2,015</td></tr> <tr><td>Old Connaught</td><td>50.13</td><td>2,005</td><td>50.13</td><td>2,005</td></tr> <tr><td>Rathmichael</td><td>83.05</td><td>2,431</td><td>83.05</td><td>2,431</td></tr> <tr><td>DLR Total (excluding Cherrywood)</td><td>459.73</td><td>17,167</td><td>459.73</td><td>17,167</td></tr> <tr><td>Cherrywood</td><td>93.55</td><td>5,596 - 8,186</td><td>93.55</td><td>5,596 - 8,186</td></tr> <tr><td>DLR County Total</td><td>553.28</td><td>22,763 – 25,353</td><td>553.28</td><td>22,763 – 25,353</td></tr> <tr><td>DLR Housing Target (2022-2028)</td><td></td><td></td><td></td><td>20,669</td></tr> <tr><td>Excess</td><td></td><td></td><td></td><td>2,094 - 4,684</td></tr> </tbody> </table> <p>Amended Table 2.10:</p> <table border="1"> <thead> <tr> <th style="color: red;"><i>Location</i></th> <th style="color: red;"><i>RDCA Existing Zoning (Ha)</i></th> <th style="color: red;"><i>RDCA Existing Residential Yield</i></th> <th style="color: red;"><i>County Development Plan 2022-2028 Proposed Zoning (Ha)</i></th> <th style="color: red;"><i>County Development Plan 2022–2028 Proposed Residential Yield</i></th> </tr> </thead> <tbody> <tr><td style="color: red;"><i>Infill/Windfall</i></td><td style="color: red;"><i>165.86</i></td><td style="color: red;"><i>4,571</i></td><td style="color: red;"><i>165.86</i></td><td style="color: red;"><i>4,571</i></td></tr> <tr><td style="color: red;"><i>Ballyogan &amp; Environs</i></td><td style="color: red;"><i>71.8</i></td><td style="color: red;"><i>4,147</i></td><td style="color: red;"><i>71.8</i></td><td style="color: red;"><i>4,147</i></td></tr> <tr><td style="color: red;"><i>Woodbrook-Shanganagh</i></td><td style="color: red;"><i>29.53</i></td><td style="color: red;"><i>1,998</i></td><td style="color: red;"><i>29.53</i></td><td style="color: red;"><i>1,998</i></td></tr> <tr><td style="color: red;"><i>Kiltiernan-Glenamuck</i></td><td style="color: red;"><i>59.34</i></td><td style="color: red;"><i>2,015</i></td><td style="color: red;"><i>59.34</i></td><td style="color: red;"><i>2,015</i></td></tr> <tr><td style="color: red;"><i>Old Connaught</i></td><td style="color: red;"><i>50.13</i></td><td style="color: red;"><i>2,005</i></td><td style="color: red;"><i>50.13</i></td><td style="color: red;"><i>2,005</i></td></tr> <tr><td style="color: red;"><i>Rathmichael</i></td><td style="color: red;"><i>83.05</i></td><td style="color: red;"><i>2,431</i></td><td style="color: red;"><i>83.05</i></td><td style="color: red;"><i>2,431</i></td></tr> </tbody> </table>				Location	RDCA Existing Zoning (Ha)	RDCA Existing Residential Yield	CDP 2022-2028 Proposed Zoning (Ha)	CDP 2022–2028 Proposed Residential Yield	Infill/Windfall	165.86	4,571	165.86	4,571	Ballyogan & Environs	71.8	4,147	71.8	4,147	Woodbrook-Shanganagh	29.53	1,998	29.53	1,998	Kiltiernan-Glenamuck	59.34	2,015	59.34	2,015	Old Connaught	50.13	2,005	50.13	2,005	Rathmichael	83.05	2,431	83.05	2,431	DLR Total (excluding Cherrywood)	459.73	17,167	459.73	17,167	Cherrywood	93.55	5,596 - 8,186	93.55	5,596 - 8,186	DLR County Total	553.28	22,763 – 25,353	553.28	22,763 – 25,353	DLR Housing Target (2022-2028)				20,669	Excess				2,094 - 4,684	<i>Location</i>	<i>RDCA Existing Zoning (Ha)</i>	<i>RDCA Existing Residential Yield</i>	<i>County Development Plan 2022-2028 Proposed Zoning (Ha)</i>	<i>County Development Plan 2022–2028 Proposed Residential Yield</i>	<i>Infill/Windfall</i>	<i>165.86</i>	<i>4,571</i>	<i>165.86</i>	<i>4,571</i>	<i>Ballyogan &amp; Environs</i>	<i>71.8</i>	<i>4,147</i>	<i>71.8</i>	<i>4,147</i>	<i>Woodbrook-Shanganagh</i>	<i>29.53</i>	<i>1,998</i>	<i>29.53</i>	<i>1,998</i>	<i>Kiltiernan-Glenamuck</i>	<i>59.34</i>	<i>2,015</i>	<i>59.34</i>	<i>2,015</i>	<i>Old Connaught</i>	<i>50.13</i>	<i>2,005</i>	<i>50.13</i>	<i>2,005</i>	<i>Rathmichael</i>	<i>83.05</i>	<i>2,431</i>	<i>83.05</i>	<i>2,431</i>
Location	RDCA Existing Zoning (Ha)	RDCA Existing Residential Yield	CDP 2022-2028 Proposed Zoning (Ha)	CDP 2022–2028 Proposed Residential Yield																																																																																															
Infill/Windfall	165.86	4,571	165.86	4,571																																																																																															
Ballyogan & Environs	71.8	4,147	71.8	4,147																																																																																															
Woodbrook-Shanganagh	29.53	1,998	29.53	1,998																																																																																															
Kiltiernan-Glenamuck	59.34	2,015	59.34	2,015																																																																																															
Old Connaught	50.13	2,005	50.13	2,005																																																																																															
Rathmichael	83.05	2,431	83.05	2,431																																																																																															
DLR Total (excluding Cherrywood)	459.73	17,167	459.73	17,167																																																																																															
Cherrywood	93.55	5,596 - 8,186	93.55	5,596 - 8,186																																																																																															
DLR County Total	553.28	22,763 – 25,353	553.28	22,763 – 25,353																																																																																															
DLR Housing Target (2022-2028)				20,669																																																																																															
Excess				2,094 - 4,684																																																																																															
<i>Location</i>	<i>RDCA Existing Zoning (Ha)</i>	<i>RDCA Existing Residential Yield</i>	<i>County Development Plan 2022-2028 Proposed Zoning (Ha)</i>	<i>County Development Plan 2022–2028 Proposed Residential Yield</i>																																																																																															
<i>Infill/Windfall</i>	<i>165.86</i>	<i>4,571</i>	<i>165.86</i>	<i>4,571</i>																																																																																															
<i>Ballyogan &amp; Environs</i>	<i>71.8</i>	<i>4,147</i>	<i>71.8</i>	<i>4,147</i>																																																																																															
<i>Woodbrook-Shanganagh</i>	<i>29.53</i>	<i>1,998</i>	<i>29.53</i>	<i>1,998</i>																																																																																															
<i>Kiltiernan-Glenamuck</i>	<i>59.34</i>	<i>2,015</i>	<i>59.34</i>	<i>2,015</i>																																																																																															
<i>Old Connaught</i>	<i>50.13</i>	<i>2,005</i>	<i>50.13</i>	<i>2,005</i>																																																																																															
<i>Rathmichael</i>	<i>83.05</i>	<i>2,431</i>	<i>83.05</i>	<i>2,431</i>																																																																																															

Observations, Submissions and Recommendations	Executive’s Response & Recommendation				
	<b><i>DLR Total (excluding Cherrywood)</i></b>	<i>459.73</i>	<i>17,167</i>	<i>459.73</i>	<i>17,167</i>
	<b><i>Cherrywood</i></b>	<i>93.55</i>	<i>5,596 - 8,186</i>	<i>93.55</i>	<i>5,596 - 8,186</i>
	<b><i>DLR County Total</i></b>	<i>553.28</i>	<i>22,763 – 25,353</i>	<i>553.28</i>	<i>22,763 – 25,353</i>
	<b><i><u>Less Actual and Estimated Completions Q1 2020 to Q1 2022</u></i></b>				<i><u>1,877</u></i>
	<b><i><u>Adjusted Total</u></i></b>				<i><u>20,886 – 23,476</u></i>
	<b><i><u>HST Housing Target Q2 2022 to Q1 2028</u></i></b>				<i><u>15,225</u></i>
	<b><i><u>DLR Housing Target Q2 2022 to Q1 2028 (2022-2028) (Inclusive of ‘Headroom’)</u></i></b>				<i><u>20,669</u></i> <i><u>18,515</u></i>
	<b><i><u>Excess</u></i></b>				<i><u>2,094 – 4,684</u></i> <i><u>2,371 – 4,961</u></i>
	<p>Amend the associated text in the second and third paragraphs of Section 2.4.4 as follows:</p> <p><i>Section 2.3.2 above details the population projection for DLR for the Plan period 2022-2028. The population projection is informed by the provisions of the NPF and RSES and provides the basis for calculating the housing target for DLR for the Plan period. As set out in Section 2.3.6 above there is provision for an additional <del>20,669</del> <u>18,515</u> residential units. As detailed in the Core Strategy Table below the housing target for DLR is broadly consistent with the existing residential capacity of zoned land in DLR, as ascertained through the Residential Development Capacity Audit.</i></p> <p><i>While the Core Strategy Table below identifies an excess of between <del>2,094 and 4,684</del> units <u>2,371 and 4,961</u> homes, reference is made to the Guidance Note on Core Strategies which advises that any excess (of lands or housing capacity) will not normally include lands identified for strategic long-term development as part of Strategic Development Zones or major regeneration sites within key areas. The full capacity of the Cherrywood Strategic Development Zone is incorporated into the Core Strategy Table below and comprises an estimated residential yield of between 5,596 to 8,186 units. While the Cherrywood SDZ lands comprise Tier 1 and 2 zoned residential lands that may be developed within the lifetime of the Plan, it is acknowledged that the full build-out of Cherrywood may extend beyond the timeframe of the Plan. In this</i></p>				

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
	<p><i>context, and as provided for in the Guidance Note on Core Strategies, it is not considered necessary to apply any specific mechanisms to address the relatively minor excess identified in the Core Strategy Table.</i></p>
<p><b>2.1.4 Settlement Hierarchy</b></p>	
<p>i) The OPR is satisfied that the settlement hierarchy is generally appropriate and consistent with national and regional policy and with relevant legislative provisions, as applies to the highly urbanised context of the planning authority.</p>	<p>The Planning Authority welcomes the comments of the Regulator highlighting the appropriateness of the settlement hierarchy proposed in the Draft Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p><b>2.1.5 Residential Land Supply</b></p>	
<p>i) <b>Extent of Land Use Zoning</b> Considers that the proposed extent of land use zoning in the Core Strategy, for residential development and for a mixture of residential and other uses, is based on a housing demand target (c.22,800 units, including part of Cherrywood SDZ) that is significantly in excess of the housing supply target calculated in accordance with the Housing Supply Target Methodology Guidelines (2020) at c. 15,000. Considers this indicates that excessive lands are proposed to be zoned under the Draft County Development Plan.</p> <p>Notes that Section 2.3.7.1 of the Core Strategy explains that in determining the housing yield of land zoned under the Plan, the densities and capacity calculations of existing statutory Local Area Plans were applied. Submits that as most of those LAPs predate the NPF, the RSES and relevant Section 28 guidelines, that the densities and capacities applied may no longer be appropriate or,</p>	<p><b>OPR Recommendation 2(a)</b> <b>Review the quantity of land zoned for residential or a mixture of residential and other uses in the core strategy (table 2.10) to ensure consistency with population targets in the NPF Roadmap and with the housing supply targets, as required under the section 28 Housing Supply Targets Methodology for Development Planning Guidelines for Planning Authorities (December 2020), having regard to current guidelines relating to residential density.</b></p> <p><b>OPR Recommendation 2(a): Executive’s Response</b> It is highlighted that a number of the key inputs which have informed the OPR’s <b>Recommendation</b> are proposed to be amended above. These include, most notably, the DLR housing target and the land availability to provide for same. As set out in response to OPR <b>Recommendation</b> 1(b) the evidence would suggest that the HST housing target does not incorporate population ‘headroom’ and as such relates to housing supply pertaining primarily to the plan period. The Local Authority would have significant concerns regarding the application of the HST housing target as the primary input to inform zoning requirements and its potential to result in an under-supply in the availability of residential zoned land. The HST Guidelines provide that the NPF Roadmap projections continue to be the population parameters for strategic decision-making including the Core Strategy:</p> <p><b><i>‘These established NPF Roadmap population projections for each County continue to be the population parameters for local authority development planning processes. City or County development plans</i></b></p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
<p>indeed, consistent with the Draft County Development Plan.</p> <p>Notes the methodology applied to determine housing yield and density for infill/windfall sites applies the permitted housing yield for sites with extant planning permission and assumes 50% development for all other sites. States that, in view of the fact that only 27% of the sites do not have an extant permission, that the resulting estimated yield and residential density (28uph) appears quite low.</p> <p>Submits that it would provide clarity if the proposed residential yield was identified for these lands and a justified estimated yield for the remaining 27% of sites was separately provided.</p> <p>States that it is unclear whether the Core Strategy has included the potential yield from smaller infill sites, such as corner/side garden, backland development or subdivision of dwellings</p> <p><b>Recommendation 2 - Residential land supply</b>  <b>Having regard to section 10(2A) of the Act, the requirement for compact growth in accordance with National Policy Objective 3, and the approach to zoning required under National Policy Objective 72 (a-c), the planning authority is required to:</b></p> <p><b>a) Review the quantity of land zoned for residential or a mixture of residential and other uses in the core strategy (table 2.10) to ensure consistency with population targets in the NPF Roadmap and with the housing supply targets, as required under the section 28 Housing Supply</b></p>	<p><b><i>must therefore plan for the identified population growth within these estimates and use them as the basis for strategic decision-making in their development plan process, including its core strategy, settlement strategy and housing policies.</i></b>’ (Section 2.2, p.4)</p> <p>Furthermore, the HST Guidelines explicitly state that the County Development Plan must provide for housing to the extent identified in the established NPF Roadmap:</p> <p><b><i>‘City and County development plans must therefore plan to provide housing to the extent identified in the established NPF Roadmap population projections for their local authority and accordingly in the NPF 50:50 City housing projection scenario, in core strategy, settlement strategy and associated identification of development potential and zoning exercises.</i></b> (Section 4.3, p.7)</p> <p>The adjusted Core Strategy Table identifies an excess of land equating to between c. 2,400 and 4,900 homes. It is highlighted, however, that the Core Strategy Table incorporates the full capacity of the Cherrywood SDZ which comprises an estimated residential yield of between 5,596 to 8,186 units – almost double the excess identified. The Cherrywood SDZ lands comprises a significant c. 27-35% of the total residential landbank identified in the Core Strategy Table.</p> <p>As stated in Section 2.4.4 the full build-out of Cherrywood may extend beyond the timeframe of the Plan, and as such the provisions of the ‘Guidance Note on Core Strategies’ (2010) apply, which advises that any excess (of lands or housing capacity) will not normally include lands identified for strategic long-term development as part of Strategic Development Zones or major regeneration sites. Discounting the full residential allocation of the Cherrywood SDZ from the Core Strategy Table would reduce the land availability significantly to equate to c. 15,290 units (DLR Total excluding Cherrywood less Estimated Completions 2020 to Q1 2022 – see amended Table 2.10). This approach is not recommended, however, given the progress being made at Cherrywood and the anticipated supply of homes during the lifetime of the Plan.</p> <p>The Local Authority maintains its position that broad equilibrium exists between the supply of zoned land for primarily residential purposes, and the projected demand for new housing. The Local Authority has had specific regard to the provisions of the HST Guidelines which state that County Development Plans must plan to provide housing to the extent identified in the established NPF Roadmap population projections. The excess identified in the Core Strategy Table is fully supported by the provisions of the ‘Guidance Note</p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
<p><b>Targets Methodology for Development Planning Guidelines for Planning Authorities (December 2020), having regard to current guidelines relating to residential density.</b></p> <p><b>b) Review density assumptions used to estimate the quantity of zoned land arising from the Housing Supply Targets in the revised Core Strategy having regard to the recommended residential densities for large towns, small towns and villages in the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2009).</b></p> <p><b>c) c. Review the core strategy (table 2.10) to ensure that adequate account is taken of the proposed residential yield for those sites with an extant permission with a justified estimated residential yield for those sites with no planning permission.</b></p> <p><b>In view of, in general, the favourable location of lands proposed to be zoned for residential development under the Draft Plan, in terms of compact growth and potential for implementation of an integrated land use transport approach consistent with the 10 minute settlement concept supported in the RSES, the planning authority should consider the range of options available to it to enable it to prioritise or expedite the sequential development of the most favourable lands for housing, consistent with the aforementioned housing supply targets, during the 6-year plan period.</b></p> <p><b>Those lands for which development would be delayed through an appropriate phasing approach, consistent</b></p>	<p>on Core Strategies’ (2010) which make provision for an excess of zoned residential land pertaining to strategic development zones. Furthermore, as will be addressed in greater detail in response to <b>Recommendation 5</b>, it is considered that all lands zoned for residential development are identified as either Tier 1 or Tier 2 lands, as supported by the Infrastructure Assessment included in Appendix 1 of the Draft Plan.</p> <p>The comments of the OPR in relation to residential density are dealt with below in response to <b>Recommendation 2(b)</b>. Additional comments from the OPR with respect to sequencing of development are addressed in response to <b>Recommendation 3</b>.</p> <p><b>OPR Recommendation 2(a): Executive’s Recommendation</b> No change to Draft Plan.</p> <p><b>OPR Recommendation 2(b)</b> <b>Review density assumptions used to estimate the quantity of zoned land arising from the Housing Supply Targets in the revised Core Strategy having regard to the recommended residential densities for large towns, small towns and villages in the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2009).</b></p> <p><b>OPR Recommendation 2(b): Executive’s Response</b> The Local Authority notes the recommendation of the OPR to review the density assumptions used to estimate the quantity of zoned land (Table 2.8) having regard to the recommended residential densities in the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2009). As set out on pages 29-30 of the Draft Plan a number of assumptions were applied at a site specific level in order to provide a robust estimation of potential residential yield. It is highlighted that all densities applied are either consistent with, or exceed, the recommended residential densities recommended in the ‘Sustainable Residential Development in Urban Areas’ (2009). The following sets out an overview of the density assumptions applied:</p> <ul style="list-style-type: none"> <li>• Infill / Windfall - sites with no planning permission or planning permission not commenced: Net density at 50 units per hectare.</li> <li>• Sites under Construction: Full allocation of residual unconstructed units from planning permission applied.</li> <li>• Sites identified within an existing Local Area Plan: Density or unit allocation from LAP applied.</li> </ul>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
<p><b>with the sequential approach required under the Dublin MASP (RPO 5.5 refers), should be identified and the housing and population yields specified through an evidence-based approach (see also Recommendation 3).</b></p>	<ul style="list-style-type: none"> <li>• Sandyford Urban Framework Plan: Density applied in line with the Urban Framework Plan.</li> <li>• Cherrywood SDZ: Allocation in line with SDZ Planning Scheme.</li> <li>• Old Connaught: Net density at 50 units per hectare.</li> <li>• Rathmichael: Net density at 42.5 units per hectare.</li> <li>• Traveller Accommodation Programme 2019-2024: Full allocation applied.</li> </ul> <p>The concerns of the Planning Regulator are stated as follows:</p> <p><i>‘...Section 2.3.7.1 of the core strategy explains that in determining the housing yield of land zoned under the Plan, the densities and capacity calculations of existing statutory Local Area Plans (LAPs) were applied. As most of those LAPs predate the NPF, the RSES and relevant section 28 guidelines, the densities and capacities applied may no longer be appropriate or, indeed, consistent with the Draft Plan.’</i></p> <p>While it is acknowledged that the majority of the existing Local Area Plan’s in DLR pre-date the NPF and RSES, they do not however, pre-date the relevant Section 28 Guidelines pertaining to residential density. As stated in the recommendation issued by the OPR, the relevant Section 28 Guidelines are the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities which were published in 2009. All existing Local Area Plans in DLR were prepared subsequent to the publication of these Guidelines, and as noted above, the densities contained within these Plans are either consistent with or exceed the recommended residential densities in the Guidelines.</p> <p>In calculation of the residential yield relating to zoned land, the Local Authority has attempted to apply assumptions that provide a greater degree of specificity at the site level which ultimately provides a more robust estimation of potential residential yield. These assumptions have been formulated having due regard to the relevant national policy. It is highlighted that taking a more basic approach and solely applying the recommended residential densities set out in the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2009) would decrease, rather than increase, the residential capacity of zoned land identified in the Core Strategy. Notwithstanding, it is acknowledged that greater clarity could be provided on the matter and it is recommended that additional text is incorporated referring to the application of densities in accordance with national policy.</p> <p><b>OPR Recommendation 2(b): Executive’s Recommendation</b>  <b>Insert additional text to section 2.3.7.1 as follows:</b></p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
	<p><i>‘A number of assumptions were applied at a site-specific level in order to provide a robust estimation of potential residential yield. Where applicable, residential density and capacity calculations already set out in existing statutory plans were applied. <u>These densities are either consistent with or exceed the recommended residential densities in the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2009).</u> Outside of these plan areas potential residential yield was <u>also</u> calculated having regard to the residential densities recommended in the ‘Sustainable Residential Development in Urban Areas’ (2009), with consideration given to sites that would be more suited to higher residential density.’</i></p> <p><b>OPR Recommendation 2(c)</b>  <b>Review the core strategy (Table 2.10) to ensure that adequate account is taken of the proposed residential yield for those sites with an extant permission with a justified estimated residential yield for those sites with no planning permission.</b></p> <p><b>OPR Recommendation 2(c): Executive’s Response</b>            In advance of addressing the OPR’s recommendation, the Local Authority would seek to clarify some of the commentary on the issue. The following comments from the OPR are noted:</p> <p><i>‘The Office also notes the methodology applied to determine housing yield and density for infill/windfall sites, which applies the permitted housing yield for sites with extant planning permission and assumes 50% development for all other sites.’</i></p> <p>The wording in the Draft Plan does not support the summarisation of the methodology for the calculation of residential yield in the ‘infill/windfall’ category as stated in the OPR’s submission. With regard to infill/windfall sites, page 30 of the Draft Plan states the following:</p> <p><i>‘The category of infill/windfall comprises a broad mix of sites within the existing built-up footprint of the County and includes both sites which are under construction and sites where there is no construction activity. <b>For sites which have commenced construction, the full residual residential yield of the associated planning permission is incorporated...</b>In order to provide for a balance between the inclusion of suitable infill and brownfield sites that promote compact growth, but which may not come forward for development within the lifetime of the Plan, and to ensure that sufficient lands are zoned to allow for overall projected</i></p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
	<p><i>growth, the residential yield for the category infill/windfall is calculated based on an assumption that half of the total site area (for sites where there is no construction activity) would be brought forward for development within the lifetime of the Plan.’</i></p> <p>Furthermore, a footnote on page 30 of the Draft Plan states the following:</p> <p><i>‘Note: The category ‘Infill/Windfall’ incorporates both sites which are under construction and sites where there is no construction activity. For sites which have commenced construction, the full residual residential yield of the associated planning permission is incorporated. For sites where no construction has commenced, it is assumed that half of the total area of these sites would be brought forward for development within the lifetime of the Plan.’</i></p> <p>For clarity purposes, the category ‘infill/windfall’ comprises the following sub-categories:</p> <ul style="list-style-type: none"> <li>• Infill/Windfall Category 1: Site under construction (planning permission being implemented) – Full residual residential yield from planning permission incorporated.</li> <li>• Infill/Windfall Category 2: Site with an extant planning permission not commenced – Gross to net: site area minus 20%. Net density at 50 units per hectare applied. Assumed that 50% of total infill/windfall site area for this category will be developed within the lifetime of the County Development Plan.</li> <li>• Infill/Windfall Category 3: Site with no planning permission - Gross to net: site area minus 20%. Net density at 50 units per hectare applied. Assumed that 50% of total infill/windfall site area for this category will be developed within the lifetime of the County Development Plan.</li> </ul> <p>The Executive would also seek to clarify the comment in the submission from the OPR which states that <i>‘In view of the fact that only 27% of the sites do not have an extant permission (according to the Infrastructure Assessment) the resulting estimated yield and residential density (28uph) appear quite low’</i>. Page 11 of Appendix 1 of the Draft Plan (the ‘Infrastructure Assessment’) states that <i>‘63% of identified ‘infill/windfall’ sites in the County are either under construction or have the benefit of an extant planning permission for residential development.’</i> There are thus 37% of sites (c. 40% of site area) in the category ‘infill/windfall’ which do not have the benefit of planning permission.</p> <p>The residential densities used to estimate the quantity of zoned land (Table 2.8) are set out above in response to OPR <b>Recommendation 2(b)</b>. It is not clear how the OPR has estimated the application of a</p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
	<p>residential density of 28 units per hectare. The densities applied to lands in the category ‘infill/windfall’ are all significantly in excess of this figure and consistent with national policy.</p> <p>In response to <b>Recommendation 2(c)</b>, the Local Authority are of the opinion that, having regard to relevant national policy on the matter, the application of a net density of 50 units per hectare is fully justified for sites within the ‘infill/windfall’ category that either: have the benefit of planning permission which has not been implemented; or, sites which do not have the benefit of planning permission.</p> <p>In order to provide additional clarity on the matter, it is recommended that the category of ‘infill/windfall’ in Table 2.8 of the Draft Plan is disaggregated to reflect the following sub-categories:</p> <ul style="list-style-type: none"> <li>• Infill/Windfall – Sites under Construction</li> <li>• Infill/Windfall – Sites with an extant planning permission not commenced</li> <li>• Infill/Windfall – Sites with no planning permission</li> </ul> <p>In addition, the OPR’s comments are noted with regard to whether the calculation of residential yield included the potential yield from smaller infill sites, such as corner/side garden, backland development or subdivision of dwellings. To provide some additional context to the comprehensiveness of the audit undertaken, the following sets a summary overview of the primary steps in the methodology employed for the Residential Development Capacity Audit.</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p><b>Step 1 – Process: Initial Data Set Compilation</b></p> <p>An initial data-set was created through the intersection of the following data-sets:</p> <ul style="list-style-type: none"> <li>• OSI boundary data</li> <li>• Geo-Directory data</li> </ul> <p>OSI boundary data identifies distinct parcels of land throughout the County. Geo-Directory data identifies all sites in the County that have an address point and allocates a commercial or residential use to each address point. Through the intersection of these two data-sets it was possible to establish those sites that were in use - and by default identification of those sites that did not have an address point or were not in use.</p> <p><b>Step 1 – Output: Spatial layer of all sites in the County, identified using OSI boundary data, that are not in residential or commercial use.</b></p> </div> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p><b>Step 2 – Process: Refinement of Sites (Existing Land Use Zonings)</b></p> </div>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
	<p>The initial data-set of potential sites was intersected with the principle land-use zonings of the DLR County Development Plan 2016-2022 where residential as a land use was either ‘permitted in principle’ or ‘open for consideration’.</p> <p><b>Step 2 – Output: Refinement of sites to reflect existing zoning for residential use.</b></p> <p><b>Step 3 – Process: Refinement of Sites (Roads)</b></p> <p>The data-set of potential sites was again refined to take account of planned roads. The potential sites were intersected with the existing and planned road network.</p> <p><b>Step 3 – Output: Refinement of sites to take account of existing and planned roads in the County.</b></p> <p><b>Step 4 – Process: Incorporation of Housing Taskforce Data</b></p> <p>Housing Taskforce Data keeps a record of all residential schemes in the County of 10+ units. The spatial data of Housing Taskforce Data Tier 1 was added to the data-set.</p> <p><b>Step 4 – Output: Data set expanded to incorporate all sites in the County that have planning permission for residential development of 10+ units.</b></p> <p><b>Step 5 – Process: Preliminary Assessment</b></p> <p>A high-level preliminary assessment of potential sites was undertaken using both quantitative and qualitative criteria including <i>inter alia</i> the following:</p> <ul style="list-style-type: none"> <li>• Planning activity (including current and historical)</li> <li>• Local Area Plans</li> <li>• Planning policy provision</li> <li>• Vacant sites</li> <li>• Flooding maps (CFRAM and SFRA)</li> <li>• Housing Land Availability Study (County Development Plan 2016)</li> <li>• Scale and feasibility</li> <li>• Local knowledge</li> </ul> <p><b>Step 5 - Output: Refinement of potential sites</b></p> <p><b>Step 6 – Process: Classification</b></p> <p><b>Step 6 – Outputs: Spatial layer of potential sites incorporating classifications appropriate to the output requirements of the RDCA.</b></p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation																																				
	<div data-bbox="913 316 2072 352" style="background-color: #0070C0; color: white; padding: 2px;"><b>Step 7 – Process: Review and Validation</b></div> <p data-bbox="913 352 2072 448">A comprehensive review and validation process of the data-set was undertaken to refine and improve the accuracy of the data. In addition, the data was reviewed to take account of the Q4 2019 HTF returns with intended point in time for completion of the RDCA to align with year-end 2019.</p> <div data-bbox="913 448 2072 485" style="background-color: #D9E1F2; padding: 2px;"><b>Step 7 - Output: Validated spatial layer of sites for the RDCA.</b></div> <p data-bbox="913 520 2072 778">The analysis was undertaken in ArcGIS and incorporated a range of data-sets. The initial step in the process intersected OSI boundary data with Geo-Directory data and as such considered all sites in the County, irrespective of site area. With regard to resident’s gardens – these would have been excluded at the initial stage if they formed part of a person’s home. However, some residential sites, including gardens, would have been incorporated at a later stage, through for example the incorporation of Housing Task Force data which identified sites with planning permission for residential development. The analysis did not make provision for the subdivision of dwellings and the Local Authority does not consider this category to be of a scale to warrant inclusion in the Core Strategy Table.</p> <p data-bbox="913 815 2072 879"><b>OPR Recommendation 2(c): Executive’s Recommendation</b> Amend Table 2.8 to provide a breakdown of the category ‘infill/windfall’:</p> <table border="1" data-bbox="913 911 2051 1366"> <thead> <tr> <th><i>Location</i></th> <th><i>Hectares</i></th> <th><i>Potential Residential Yield</i></th> <th><i>Zoning Tier</i></th> </tr> </thead> <tbody> <tr> <td><i><u>Infill/Windfall – Sites under Construction</u></i></td> <td><i><u>35.63</u></i></td> <td><i><u>1,837</u></i></td> <td><i><u>Tier 1</u></i></td> </tr> <tr> <td><i><u>Infill/Windfall – Sites with an extant planning permission not commenced</u></i></td> <td><i><u>63.1</u></i></td> <td><i><u>1,299</u></i></td> <td><i><u>Tier 1</u></i></td> </tr> <tr> <td><i><u>Infill/Windfall – Sites with no planning permission</u></i></td> <td><i><u>67.13</u></i></td> <td><i><u>1,436</u></i></td> <td><i><u>Tier 1 and Tier 2</u></i></td> </tr> <tr> <td><i><u>Infill/Windfall - Total</u></i></td> <td><i><u>165.86</u></i></td> <td><i><u>4,571</u></i></td> <td><i><u>Tier 1 and Tier 2</u></i></td> </tr> <tr> <td><i><u>Ballyogan &amp; Environs</u></i></td> <td><i><u>71.8</u></i></td> <td><i><u>4,147</u></i></td> <td><i><u>Tier 1 and Tier 2</u></i></td> </tr> <tr> <td><i><u>Woodbrook-Shanganagh</u></i></td> <td><i><u>29.53</u></i></td> <td><i><u>1,998</u></i></td> <td><i><u>Tier 1 and Tier 2</u></i></td> </tr> <tr> <td><i><u>Kiltiernan-Glenamuck</u></i></td> <td><i><u>59.34</u></i></td> <td><i><u>2,015</u></i></td> <td><i><u>Tier 1 and Tier 2</u></i></td> </tr> <tr> <td><i><u>Old Connaught</u></i></td> <td><i><u>50.13</u></i></td> <td><i><u>2,005</u></i></td> <td><i><u>Tier 2</u></i></td> </tr> </tbody> </table>	<i>Location</i>	<i>Hectares</i>	<i>Potential Residential Yield</i>	<i>Zoning Tier</i>	<i><u>Infill/Windfall – Sites under Construction</u></i>	<i><u>35.63</u></i>	<i><u>1,837</u></i>	<i><u>Tier 1</u></i>	<i><u>Infill/Windfall – Sites with an extant planning permission not commenced</u></i>	<i><u>63.1</u></i>	<i><u>1,299</u></i>	<i><u>Tier 1</u></i>	<i><u>Infill/Windfall – Sites with no planning permission</u></i>	<i><u>67.13</u></i>	<i><u>1,436</u></i>	<i><u>Tier 1 and Tier 2</u></i>	<i><u>Infill/Windfall - Total</u></i>	<i><u>165.86</u></i>	<i><u>4,571</u></i>	<i><u>Tier 1 and Tier 2</u></i>	<i><u>Ballyogan &amp; Environs</u></i>	<i><u>71.8</u></i>	<i><u>4,147</u></i>	<i><u>Tier 1 and Tier 2</u></i>	<i><u>Woodbrook-Shanganagh</u></i>	<i><u>29.53</u></i>	<i><u>1,998</u></i>	<i><u>Tier 1 and Tier 2</u></i>	<i><u>Kiltiernan-Glenamuck</u></i>	<i><u>59.34</u></i>	<i><u>2,015</u></i>	<i><u>Tier 1 and Tier 2</u></i>	<i><u>Old Connaught</u></i>	<i><u>50.13</u></i>	<i><u>2,005</u></i>	<i><u>Tier 2</u></i>
<i>Location</i>	<i>Hectares</i>	<i>Potential Residential Yield</i>	<i>Zoning Tier</i>																																		
<i><u>Infill/Windfall – Sites under Construction</u></i>	<i><u>35.63</u></i>	<i><u>1,837</u></i>	<i><u>Tier 1</u></i>																																		
<i><u>Infill/Windfall – Sites with an extant planning permission not commenced</u></i>	<i><u>63.1</u></i>	<i><u>1,299</u></i>	<i><u>Tier 1</u></i>																																		
<i><u>Infill/Windfall – Sites with no planning permission</u></i>	<i><u>67.13</u></i>	<i><u>1,436</u></i>	<i><u>Tier 1 and Tier 2</u></i>																																		
<i><u>Infill/Windfall - Total</u></i>	<i><u>165.86</u></i>	<i><u>4,571</u></i>	<i><u>Tier 1 and Tier 2</u></i>																																		
<i><u>Ballyogan &amp; Environs</u></i>	<i><u>71.8</u></i>	<i><u>4,147</u></i>	<i><u>Tier 1 and Tier 2</u></i>																																		
<i><u>Woodbrook-Shanganagh</u></i>	<i><u>29.53</u></i>	<i><u>1,998</u></i>	<i><u>Tier 1 and Tier 2</u></i>																																		
<i><u>Kiltiernan-Glenamuck</u></i>	<i><u>59.34</u></i>	<i><u>2,015</u></i>	<i><u>Tier 1 and Tier 2</u></i>																																		
<i><u>Old Connaught</u></i>	<i><u>50.13</u></i>	<i><u>2,005</u></i>	<i><u>Tier 2</u></i>																																		

Observations, Submissions and Recommendations	Executive’s Response & Recommendation			
	<i>Rathmichael</i>	<i>83.05</i>	<i>2,431</i>	<i>Tier 2</i>
	<i>Cherrywood</i>	<i>93.55</i>	<i>5,596 - 8,186</i>	<i>Tier 1 and Tier 2</i>
	<i>Total</i>	<i>553.28</i>	<i>22,763 - 25,353</i>	
	<i><u>Less Actual and Estimated Completions Q1 2020 to Q1 2022</u></i>		<i><u>1,877</u></i>	
	<i><u>Adjusted Total</u></i>		<i><u>20,886 – 23,476</u></i>	
<b>Compact Growth, Regeneration and Tiered Approach to Zoning</b>				
<b>2.1.6 Compact Growth</b>				
<p>i) Submission highlights NPO 3b of the NPF that requires 50% of all new homes within the five designated cities and their suburbs to be delivered within the ‘existing built up footprint’ of settlements in order to achieve National Strategic Objective 1 - compact growth. The submission also refers to RSES RPO 3.2 which is considered to be relevant in this respect.</p> <p>States that it is important that consideration of those areas identified as contributing to compact growth is based on the UN criteria of settlements (clarified in End-note 17 of the NPF) and the broader provisions of the NPF regarding compact growth.</p> <p>Submits that the challenge for DLR will be to deliver infill/ brownfield development and locations well served by high quality public transport as part of the transition to a low carbon economy, including the fulfilment of the requirements under section 10(2)(n) of the Act.</p> <p>Considers that, while lands zoned for residential development in the Draft County Development Plan are</p>	<p><b>OPR Recommendation 3</b>  <b>Having regard to:</b></p> <ul style="list-style-type: none"> <li>• <b>National Planning Objective 3b, to deliver at least half of all new homes that are targeted in Dublin city and suburbs within its existing built-up footprint;</b></li> <li>• <b>National Planning Objective 72(a-c) and Regional Policy Objective 5.5, that future residential development shall follow a clear sequential approach; and</b></li> <li>• <b>the need to ensure that sustainable settlement and transport strategies in the plan include measures which clearly promote measures to reduce energy use and to reduce GHG emissions through the location, layout and design of new development in accordance with section 10(2)(n) of the Act and in view of the Government’s stated policy on climate change under the Climate Action Plan 2019;</b></li> </ul> <p><b>The Planning Authority is required to prioritise the sequential development of more favourably located lands, in terms of access to quality public transport (including with regards to the projected delivery of same) in order to better achieve meaningful compact growth in accordance with the National Planning Framework and to achieve meaningful reductions on energy use and GHG emissions associated with future development through sustainable settlement and transport strategies.</b></p> <p><b>OPR Recommendation 3: Executive’s Response</b>                      To deliver plan-led growth in the County it is considered necessary to pursue a balanced approach to spatial development which supports both a compact growth agenda, through the densification of the existing built-up area of the County, and also through the identification of strategically located greenfield sites, which support the principles of sustainable development.</p>			

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
<p>generally well located. There are, however, a number of more peripheral legacy locations which require significant public transport investment in order to avoid becoming overly car dependant commuter areas.</p> <p>Submits that the continuance of extensive residential zoning to the south of the M50 / west of the M11 at Rathmichael (83ha) would appear to continue a pattern of sprawl on the periphery. Notes that Rathmichael is not identified in the RSES or Dublin MASP and is an un-serviced area characterised by very low density, suburban style housing on large sites with onsite WWT systems (septic tanks).</p> <p>Considers the principle of continuing the extensive residential zoning at Old Connaught, west of the M11, in the short to medium term, to be questionable, given the need for consolidation within Bray (in addition to the development of Woodbrook-Shanganagh LAP). Notes Old Connaught has major infrastructure deficits which do not appear to be realistically capable of substantially resolving within the plan period.</p> <p>The submission does note, however, that Old Connaught forms part of the expansion of Bray Key Town under the RSES (RPO 4.37) and has been identified as a strategic development area on the North-South Corridor (DART expansion line), and that EMRA has allocated growth as part of the Bray Key Town to 2031. Acknowledges that provision is made for this allocation through the proposed strategic land reserve at Old Connaught.</p>	<p>The Local Authority acknowledges the contents of NPO 3b of the NPF which provides that it is an objective to deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints. It is highlighted, that under the RSES, this objective was broadened under Compact Growth RPO 3.2. as follows:</p> <p><i>‘Local authorities, in their core strategies shall set out measures to achieve compact urban development targets of at least 50% of all new homes <b>within or contiguous</b> to the built up area of Dublin city and suburbs and a target of at least 30% for other urban areas.’</i></p> <p>The requirement incorporated under the RSES relates to a compact growth target of at least 50% of all new homes <i>‘within or contiguous to the built up area of Dublin city and suburbs’</i>. Page 45 of the Draft Plan includes a compact growth analysis which quantified the Core Strategy Table and identified a potential residential yield of between 20,664 to 23,254 homes within or contiguous to the boundary of Dublin City and Suburbs. This provision is not only consistent with, but significantly exceeds the policy provisions of NPO 3b and RPO 3.2. The vast majority of growth identified in the Core Strategy is located within the Dublin City and Suburbs boundary while growth areas at Woodbrook and parts of Cherrywood and parts of Rathmichael are contiguous to the boundary.</p> <p>In terms of formulating the settlement hierarchy for the County, RPO 4.1 of the RSES provides that Local Authorities shall determine its hierarchy of settlements in accordance with the hierarchy, guiding principles and typology of settlements set out in the RSES. Table 2.9 in the Draft Plan sets out the DLR settlement typology in the context of the RSES settlement hierarchy. As set out above, the majority of the built-up footprint of DLR is located within the area defined as Dublin City and Suburbs, which comprises the first tier in the regional settlement hierarchy. With regard to the growth areas referred to by the OPR, the Rathmichael lands are located within or contiguous to the Dublin City and Suburbs boundary – tier 1 in the regional settlement hierarchy - while Old Connaught is specifically identified in the RSES for future growth as part of the westward expansion of the ‘Key Metropolitan Town’ of Bray, which comprises tier 3 in the RSES Settlement Hierarchy. Furthermore, the Dublin MASP specifically identifies Old Connaught as suitable for the development of a new residential community under the North-South Corridor (DART) with a delivery timeframe of the short to medium term.</p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
<p>Notes the Dublin MASP (RPO 5.5) requires that future residential development follows a clear sequential approach with a primary focus on the consolidation of Dublin and suburbs and the development of Key metropolitan towns. Submits that consideration of same should demonstrably inform the approach to spatial planning in DLR.</p> <p><b>Recommendation 3 - Prioritisation of preferable locations</b></p> <p><b>Having regard to:</b></p> <ul style="list-style-type: none"> <li>• <b>National Planning Objective 3b, to deliver at least half of all new homes that are targeted in Dublin city and suburbs within its existing built-up footprint;</b></li> <li>• <b>National Planning Objective 72(a-c) and Regional Policy Objective 5.5, that future residential development shall follow a clear sequential approach; and</b></li> <li>• <b>the need to ensure that sustainable settlement and transport strategies in the plan include measures which clearly promote measures to reduce energy use and to reduce GHG emissions through the location, layout and design of new development in accordance with section 10(2)(n) of the Act and in view of the Government’s stated policy on climate change under the Climate Action Plan 2019;</b></li> </ul> <p><b>the planning authority is required to prioritise the sequential development of more favourably located lands, in terms of access to quality public transport (including with regards to the projected delivery of same) in order to better achieve meaningful compact growth in accordance with the National Planning</b></p>	<p>The submission from the OPR states that consideration of RPO 5.5 should ‘...<i>demonstrably inform the approach to spatial planning in the County.</i>’ RPO 5.5 of the RSES states the following:</p> <p><i>RPO 5.5: Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall <u>follow a clear sequential approach</u>, with a <b>primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES.</b></i></p> <p>As set out above, the lands at Rathmichael are located within or contiguous to the Dublin City and Suburbs boundary. As set out under RPO 5.5, in terms of applying a clear sequential approach, there should be a primary focus on the consolidation of Dublin City and Suburbs. Notwithstanding the infrastructural constraints pertaining to the Rathmichael area, which will be addressed below, from a planning policy perspective it is considered that the identification of the Rathmichael lands is consistent with the provisions of both RPO 3.2 and RPO 5.5.</p> <p>Bray is identified in the RSES as a ‘Key Metropolitan Town’ which specifically identifies Old Connaught for residential development (RSES, p.77). This designation is further supported by its inclusion in the MASP on the North-South Corridor (DART) with a delivery timeframe of the short to medium term. In terms of applying a clear sequential approach, it is considered that the identification of Old Connaught for residential development is consistent with the provisions of RPO 5.5, the strategic development corridor approach set out for the Dublin MASP, and the overarching settlement strategy of the RSES which supports the development of Key Metropolitan Towns.</p> <p>Notwithstanding the above, it is acknowledged that Old Connaught and Rathmichael are not currently serviced, and the future development of these areas is contingent upon the timely delivery of supporting infrastructure. It is considered that a plan-led approach to the development of both Rathmichael and Old Connaught is of paramount importance to ensure the proper planning and sustainable development of these new residential communities, and as such, the Local Authority supports the incorporation of phasing for the future development of these areas.</p> <p>As provided under the LAP programme contained in Table 2.15, it is the intention of the Council to prepare Local Area Plan’s for both Old Connaught and Rathmichael during the lifetime of the County Development Plan. Under the Draft Plan, the lands at Old Connaught are zoned Objective ‘A1</p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
<p><b>Framework and to achieve meaningful reductions on energy use and GHG emissions associated with future development through sustainable settlement and transport strategies.</b></p>	<p><i>’ – ‘To provide for new residential communities and Sustainable Neighbourhood Infrastructure in accordance with approved local area plans.’. Lands at Rathmichael are, however, currently zoned Objective ‘A’. It is recommended that lands currently zoned A at Rathmichael are re-zoned from Objective ‘A’ to Objective ‘A1’ – ‘To provide for new residential communities and Sustainable Neighbourhood Infrastructure in accordance with approved local area plans.’. The Local Area Plan’s for these new communities will be made by the Elected Members of the Council and prepared within the framework and objectives of the new Development Plan with its focus on inter alia climate resilience, compact growth and connectivity and the ‘10-minute’ settlement concept.</i></p> <p><b>OPR 3: Executive’s Recommendation</b>  <i>Delineate an indicative boundary for the Rathmichael LAP on Development Plan Maps 10 and 14.</i></p> <p><i>Re-zone Objective ‘A’ zoned lands within the indicative boundary of the Rathmichael Local Area Plan from Objective ‘A’ to Objective ‘A1’ – “To provide for new residential communities and Sustainable Neighbourhood Infrastructure in accordance with approved local area plans”</i></p> <p><i>Amend the text in Section 2.4.6 ‘Phasing’ as follows:</i></p> <p><b>2.4.6 Phasing</b>  <i>The NPF, RSES and the Dublin MASP all place particular emphasis, including a specific compact growth target, on the physical consolidation of Dublin City and Suburbs, in line with its status as the first tier in the settlement hierarchy for the Region. The vast majority of lands identified for development in DLR fall within or contiguous to this geographic area while lands identified for development at Old Connaught comprise a component part of the future growth of the Key Town of Bray, an area specifically identified for growth under the Dublin MASP.</i></p> <p><i>In the context of phasing it is not considered appropriate to impose phasing on the development of lands which are located within or contiguous to the existing built up area of Dublin City and Suburbs. These lands comprise a component part of the first tier in the settlement hierarchy for the Region and are considered suitable to be in the first phase of any development. As set out in the infrastructure assessment contained in Appendix 1, all potential infrastructure constraints relating to identified growth areas may be resolved within the lifetime of the Plan, and as such, it is not considered appropriate to artificially constrain</i></p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
	<p><i>development through the phasing of lands which may come on stream for development where identified constraints have been resolved. It is considered that the imposition of phasing could lead to uncertainty in the market which may impact the delivery of development at suitable locations identified for growth. For the purpose of the Core Strategy lands identified for growth are thus considered suitable to be in the first phase of development subject to being served by the requisite enabling and supporting infrastructure to support development.</i></p> <p><u><i>Notwithstanding the sequentially preferable location of residential zoned lands in the County, it is considered, having regard to the tiered approach to zoning and the Infrastructure Assessment included in Appendix 1, that the Core Strategy should incorporate a framework for the phased delivery of residential land to ensure a plan-led approach to sustainable growth.</i></u></p> <p><u><i>In this context, it is noted that Old Connaught and Rathmichael are not currently serviced, and the future development of these areas is contingent upon the timely delivery of supporting infrastructure. It is considered that a plan-led approach to the development of both Rathmichael and Old Connaught is of paramount importance to ensure the proper planning and sustainable development of these new residential communities.</i></u></p> <p><u><i>The lands at Old Connaught and Rathmichael are both zoned Objective ‘A1’ – ‘To provide for new residential communities and Sustainable Neighbourhood Infrastructure in accordance with approved local area plans.’. As provided under the LAP programme contained in Table 2.15, it is the intention of the Council to prepare Local Area Plan’s for both of these new communities during the lifetime of the Plan.</i></u></p> <p><u><i>The future Local Area Plans for Rathmichael and Old Connaught may include new land use zonings for neighbourhood centres, open space and other land uses.</i></u></p> <p>Amend Chapter 2 as follows;            Insert new bullet point under Section 2.6.1.2 (page 44) as follows:</p> <p><u><i>That LAPs provide an opportunity for a more granular breakdown of land uses.</i></u></p> <p>Insert a new paragraph at the end of Section 2.6.1.3 as follows;</p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
	<p><i><u>On lands subject to zoning objective A1 – ‘To provide for new communities and Sustainable Neighbourhood Infrastructure in accordance with approved Local Area Plans’ - a wide range of uses are both permitted in principal and open for consideration. This acknowledges the fact that the Local Area Plan process will allow for a more granular breakdown of land uses. It is noted that within the A1 zoned lands at both Old Connaught and Rathmichael there are a number of existing properties. Minor modifications and extensions to these properties can be considered in advance of the relevant Local Area Plans.</u></i></p>
<p><b>2.1.7 Infill and brownfield development</b></p>	
<p>i) The Regulator acknowledges the very positive approach taken to the promotion of infill and brownfield development. Welcomes the inclusion of objectives to establish a database for brownfield of infill sites (CS12), to support the development of strategic regeneration sites (CS13); and to address vacancy and underutilisation of land (CS14, CS15), as part of the Active Land Management approach.</p> <p>Notes that the County Development Plan demonstrates an evidence-based approach to determining infill/windfall sites, to contribute to compact growth, representing 30% of the total area of land proposed for residential development under the Core Strategy.</p> <p><b>0/0 Zoning</b> Under section 28 guidelines, it is Government policy to provide for increased residential density along public transport corridors.</p> <p>The application of the 0/0 objective on lands within Dublin city and suburbs located along high capacity public transport corridor of the DART line, is contrary to government policy.</p>	<p>The recommendation of the Office of the Planning Regulator is noted.</p> <p>It is acknowledged that it is government policy to provide for increased residential density along public transport corridors. Recent ministerial circular letter: NRUP 02/2021 is also of note as this references the forthcoming review of the 2009 Section 28 Guidelines. Whilst the circular relates more to development at the edge of towns and cities, the concluding section entitled “<i>Forthcomings Sustainable Settlement Guidance</i>” remarks that “<i>towns and their contexts are clearly not all the same, and planning policy and guidance are intended to facilitate proportionate and tailored approaches to residential development</i>” thus recognising that there is scope for more bespoke policies in a particular area.</p> <p>The issue of the 0/0 objective was raised by the OPR in a pre-draft submission made in February 2020. In this regard the OPR requested that the Planning Authority “<i>should reconsider the ‘0/0 Zone’</i>”. As a result, the existing 0/0 zone which pertains to parts of Dalkey and Killiney was re-examined when preparing the Draft Plan.</p> <p>The review of the ‘0/0 Zone’ involved input from Transportation Planning and the Conservation Officer in order to determine if any part of the ‘0/0 Zone’ could potentially be amended. Following this review, it was determined that the area where there may be more significant development potential was in the Killiney Heath residential area, where the road network may be capable of accommodating additional vehicular movement. In other areas the very unique characteristics relating to the architectural heritage and the resultant road network create challenges for sensitive infill. In addition, there are environmental sensitivities in the area which are explored as part of the iterative SEA process which was carried out at the same time as the drafting of the Plan. The 0/0 zoning objective was included in the SEA alternatives.</p> <p><b>SEA alternatives</b></p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
<p>It is also noted that the provisions of the Draft Plan relating to the conservation of ACAs and Protected Structures provides strong policy protection for the conservation of the special character of the area concerned, having regard to the Architectural Heritage Guidelines for Planning Authorities (2011).</p> <p><b>Recommendation 4 – O/O Zoning</b>  <b>Having regard to the national and regional Policy Objectives to implement compact growth within Dublin city and suburbs, including NPO 3b and RPO 3.2, and to the Sustainable Residential Development Guidelines which provide for increased residential density along public transport corridors, including in the interest of maximising the return on public transport investment, the planning authority is required to omit O/O zone objective from the plan as an unnecessary restriction of sustainable development.</b></p>	<p>This O/O zoning objective was identified and considered across a number of alternatives within the SEA ER. These alternatives are described under Section 6.5 “Type 3: Alternatives for Additional Accommodation in Existing Built-up Areas” of the SEA ER as follows:</p> <p><i>“The “O/O Zone” in the 2016 Plan has an objective for “No increase in the number of buildings permissible”. This objective covers sensitive areas of Killiney and Dalkey proximate to the coast and much of this area is located close to the DART line, where higher densities would otherwise be permissible. The Office of the Planning Regulator requested for the “O/O Zone” contained in the existing 2016 Plan not to be included in the new Plan.</i></p> <p><i>Three alternatives were considered under this type as follow:</i></p> <ul style="list-style-type: none"> <li>• <i>Type 3 - Alternative A: Include “O/O Zone”</i></li> <li>• <i>Type 3 - Alternative B: Do not include “O/O Zone”</i></li> <li>• <i>Type 3 - Alternative C: Include “O/O Zone” but reduce extent in comparison to the 2016 Plan’s coverage</i></li> </ul> <p><i>By applying the “O/O Zone” (which has an objective for “No increase in the number of buildings permissible”) over the widest area, <b>Alternative A</b> would provide the greatest amount of protection of areas which are often sensitive from an amenity (including that contributed towards by architectural structures/areas, archaeological monuments/zones and views, which are already protected under other Plan objectives) and ecological perspective (including the protected Dalkey Coastal Zone and Killiney Hill pNHA).</i></p> <p><i>However, this application of the “O/O Zone” in locations close to public transport, where government policy supports higher densities, would not contribute towards objectives for sustainable mobility, minimising greenhouse gas emissions from transport, efficiently using land, compact growth and optimising the use of existing infrastructure. Development that could be sustainably accommodated in the area covered by the “O/O Zone” under Alternative A would have the potential to be pushed out towards areas that are less well-serviced and less well-connected, resulting in unnecessary potentially significant adverse effects on all environmental components.</i></p> <p><i>By not including the “O/O Zone”, <b>Alternative B</b> would provide the least amount of protection of areas which are often sensitive from an amenity (including that contributed towards by architectural structures/areas, archaeological monuments/zones and views, which are already protected under other Plan objectives) and ecological perspective (including the protected Dalkey Coastal Zone and Killiney Hill pNHA).</i></p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
	<p><i>The removal of the “0/0 Zone” in locations close to public transport, where government policy supports higher densities, would contribute towards objectives for sustainable mobility, minimising greenhouse gas emissions from transport, efficiently using land, compact growth and optimising the use of existing infrastructure. Development that could be sustainably accommodated in the area currently covered by the “0/0 Zone” under the existing 2016 Plan would not be pushed out towards areas that are less well-serviced and less well-connected, avoiding unnecessary potentially significant adverse effects on all environmental components.</i></p> <p><b>Alternative C</b> involves including the “0/0 Zone” but reducing its extent in comparison to the 2016 Plan’s coverage, a mixture of Alternative A and B that takes into account traffic, visual and ecological designation issues and provides the “0/0 Zone” in some locations but not in others. The new objective for these areas would allow for sensitive infill in locations which are within 10 minutes’ walk of a DART station and which would not detract from the unique character of the area visually or by traffic generation which would necessitate changes to the road network.</p> <p><b>Selected Type 3 Alternative for the Plan:</b>  <i>Alternative C: Include “0/0 Zone” but reduce extent in comparison to the 2016 Plan’s coverage.</i></p> <p><b>Draft Plan</b>                      Taking into account the iterative SEA process, the revised boundary, as set out on map 7, incorporates some larger sites that may have some infill development potential. The Killiney Architectural Conservation Area (ACA) still falls within the 0/0 objective. The written statement of the Draft Plan sets out the policy details pertaining to the 0/0 objective in Section 4.3.1.1 of the Draft Plan where it is stated that  <i>“There are significant parts of Dalkey and Killiney characterised by low density development. Some of these areas have been identified as areas where no increase in the number of residential buildings will normally be permitted (i.e. the ‘0/0’ zone). However, much of this area lies close to the DART line where higher densities would, in normal circumstances, be encouraged. Sensitive infill development will, however, be considered on suitable sites as determined by the Planning Authority. Such sites should: Be located within a 10-minute walk of a DART station (refer to Car Parking Zone 2 Area, Map T2). Development shall not detract from the unique character of the area either visually or by generating traffic volumes which would necessitate road widening or other significant improvements (refer also to Section 12.3.8.8)”.</i></p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
	<p>The 0/0 zone also pertains to a small area of Sandycove.</p> <p>It is acknowledged that sensitive infill may be appropriate on sites and can be assessed via the Development Management process. The current title of the objective is considered contradictory as it implies that no new development can be accommodated whereas in fact sensitive infill can be considered subject to the policies of the Plan which is in line with the recommendation of the Office of the Planning Regulator. To comply with the recommendation of the OPR it is recommended that the 0/0 zone be omitted.</p> <p>To acknowledge the unique and sensitive nature of the area in terms of architectural heritage, the local road network, the environmental sensitivities of the area and the iterative SEA process, along with the alternatives considered in the SEA, it is recommended that a new Specific Local Objectives be added to the maps so as to ensure that development in these areas is sensitive to the rich and unique architectural heritage, the environmental sensitivities of the areas and that the road network has the available capacity to accommodate any proposed development.</p> <p><b>Recommendation</b>  Amend section 4.3.1.1 (p 82) as follows;  Omit the following  <del><i>Notable Character Area Exclusions</i></del>  <del><i>There are significant parts of Dalkey and Killiney characterised by low density development. Some of these areas have been identified as areas where no increase in the number of residential buildings will normally be permitted (i.e. the ‘0/0’ zone). However, much of this area lies close to the DART line where higher densities would, in normal circumstances, be encouraged. Sensitive infill development will, however, be considered on suitable sites as determined by the Planning Authority. Such sites should: M Be located within a 10 minute walk of a DART station (refer to Car Parking Zone 2 Area, Map T2). M Development shall not detract from the unique character of the area either visually or by generating traffic volumes which would necessitate road widening or other significant improvements (refer also to Section 12.3.8.8).</i></del>  Amend section 12.3.8.8 (p 244) as follows  Omit the following  <del><i>12.3.8.8 0/0 Zone</i></del>  <del><i>Locations have been identified on the Development Plan maps where no increase in the number of buildings will normally be permitted. Such locations include areas in the vicinity of the coastline, where density</i></del></p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
	<p><del>controls are considered appropriate in the interests of preserving their special amenity. Many of these locations are however, within close proximity of the DART line where higher densities would normally be permitted and promoted. Small scale, sensitive infill development may be considered in these areas on suitable sites where such development would not detract from the character of the area either visually or by generating traffic volumes that would cause potential congestion issues which would, in turn, necessitate road widening or other significant improvements.</del></p> <p>Chapter 14            Insert new SLO on maps 3,4, 7 and 10 as follows            It is an objective of the Council;  <u>To ensure that development in this area does not (i) have a significant negative impact on the environmental sensitivities in the area including those identified in the SEA Environmental Report, and/or (ii) does not significantly detract from the character of the area either visually or by generating traffic volumes which would necessitate road widening or other significant improvements.</u></p> <p>Maps            Omit symbol for O/O zone on legend of maps 1 – 14.            Add new SLO numbers            Amend maps 3, 4, 7 and 10 accordingly</p>
<p><b>2.1.8 Tiered Approach to Zoning</b></p>	
<p>i) The OPR welcomes the detailed Infrastructural Assessment attached as Appendix 1 of the Draft County Development Plan.</p> <p>Notes that while the Assessment identifies the additional enabling infrastructure required to accommodate the outstanding infill/windfall sites under Table 7 it does not differentiate clearly between tier 1 and tier 2 lands regarding wastewater or transport infrastructure delivery, notwithstanding that some projects are at an advanced stage of planning/authorisation whereas others are subject only of an objective proposed to continue from</p>	<p><b>OPR Recommendation 5(i)</b>  <b>Infill/windfall sites with no planning permission (Table 7). The Planning Authority is requested to use this information to make an evidence based determination regarding the potential residential yield to be achieved on the said sites over the plan period. This information should be incorporated into the core strategy (Table 2.10) to enable the residential yield for infill/windfall sites under construction/sites with extant planning permission separately from infill/windfall sites with no planning permission.</b></p> <p><b>OPR Recommendation 5(i): Executive’s Response</b>            The Infrastructure Assessment included as Appendix 1 of the Draft Plan focuses on the provision of infrastructure that is considered to be strategic in nature and does not comprise an exhaustive list of requisite infrastructures across the County. The full extent of requisite enabling infrastructure will continue to be assessed through the development management process whereupon detailed assessment will be</p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation																														
<p>the extant plan (e.g. 6-year roads objective for Brennanstown Road Improvement Scheme). Notes that should the Planning Authority deem such objectives to provide sufficient certainty, the cost of delivery of the specified infrastructure is required to be detailed.</p> <p>Submits the inclusion of this information would enable the Planning Authority to better plan for infill/windfall development and to include more accurate housing yield/densities over the plan period. It may also assist the active land management approach.</p> <p>Requests that the cost of delivery for all specified infrastructure is required to be detailed as part of the Infrastructure Assessment.</p> <p>Raises similar issues with the other major development areas identified in the Draft Plan, and in particular Old Connaught and Rathmichael. Notes that where critical enabling infrastructure cannot realistically be available within the period of the plan, the zoning of such lands is not justified under the NPO 72a of the NPF. In this regard, the Planning Regulator supports TII’s concerns regarding the inclusion of the Cherrywood to Rathmichael link road and Ferndale Road to Dublin Road, and Shanganagh link road in tables 5.3 and 5.4 of the Draft County Development Plan prior to an evaluation as prescribed under Section 7 of the Spatial Planning and National Roads Guidelines (2012).</p> <p><b>Recommendation 5 – Tiered Approach to Zoning</b></p>	<p>undertaken. In this context, all sites in the category ‘infill/windfall’ that do not have the benefit of planning permission may only be deemed Tier 1 until a full and comprehensive detailed analysis is undertaken through the development management process.</p> <p>The disaggregation of the category ‘infill/windfall’ is included as a proposed amendment to Table 2.8 in the Executive’s response to OPR <b>Recommendation 2(c)</b>. In accordance with the recommendation of the OPR, it is proposed to incorporate this disaggregation as part of the Core Strategy Table 2.10.</p> <p><b>OPR Recommendation 5(i): Executive’s Recommendation</b> Amend Table 2.10 ‘Core Strategy Table’ as set out below. Note - the following Table also illustrates the amendments to Table 2.10 proposed to be made in response to OPR <b>Recommendation 1(b)</b>. The proposed amendments that relate to this <b>Recommendation</b> comprise the disaggregation of the category ‘infill/windfall’.</p> <table border="1" data-bbox="913 740 2051 1337"> <thead> <tr> <th><i>Location</i></th> <th><i>RDCA Existing Zoning (Ha)</i></th> <th><i>RDCA Existing Residential Yield</i></th> <th><i>County Development Plan 2022-2028 Proposed Zoning (Ha)</i></th> <th><i>County Development Plan 2022-2028 Proposed Residential Yield</i></th> </tr> </thead> <tbody> <tr> <td><u><i>Infill/Windfall – Sites under Construction</i></u></td> <td><u><i>35.63</i></u></td> <td><u><i>1,837</i></u></td> <td><u><i>35.63</i></u></td> <td><u><i>1,837</i></u></td> </tr> <tr> <td><u><i>Infill/Windfall – Sites with an extant planning permission not commenced</i></u></td> <td><u><i>63.1</i></u></td> <td><u><i>1,299</i></u></td> <td><u><i>63.1</i></u></td> <td><u><i>1,299</i></u></td> </tr> <tr> <td><u><i>Infill/Windfall – Sites with no planning permission</i></u></td> <td><u><i>67.13</i></u></td> <td><u><i>1,436</i></u></td> <td><u><i>67.13</i></u></td> <td><u><i>1,436</i></u></td> </tr> <tr> <td><i>Infill/Windfall</i></td> <td><i>165.86</i></td> <td><i>4,571</i></td> <td><i>165.86</i></td> <td><i>4,571</i></td> </tr> <tr> <td><i>Ballyogan &amp; Environs</i></td> <td><i>71.8</i></td> <td><i>4,147</i></td> <td><i>71.8</i></td> <td><i>4,147</i></td> </tr> </tbody> </table>	<i>Location</i>	<i>RDCA Existing Zoning (Ha)</i>	<i>RDCA Existing Residential Yield</i>	<i>County Development Plan 2022-2028 Proposed Zoning (Ha)</i>	<i>County Development Plan 2022-2028 Proposed Residential Yield</i>	<u><i>Infill/Windfall – Sites under Construction</i></u>	<u><i>35.63</i></u>	<u><i>1,837</i></u>	<u><i>35.63</i></u>	<u><i>1,837</i></u>	<u><i>Infill/Windfall – Sites with an extant planning permission not commenced</i></u>	<u><i>63.1</i></u>	<u><i>1,299</i></u>	<u><i>63.1</i></u>	<u><i>1,299</i></u>	<u><i>Infill/Windfall – Sites with no planning permission</i></u>	<u><i>67.13</i></u>	<u><i>1,436</i></u>	<u><i>67.13</i></u>	<u><i>1,436</i></u>	<i>Infill/Windfall</i>	<i>165.86</i>	<i>4,571</i>	<i>165.86</i>	<i>4,571</i>	<i>Ballyogan &amp; Environs</i>	<i>71.8</i>	<i>4,147</i>	<i>71.8</i>	<i>4,147</i>
<i>Location</i>	<i>RDCA Existing Zoning (Ha)</i>	<i>RDCA Existing Residential Yield</i>	<i>County Development Plan 2022-2028 Proposed Zoning (Ha)</i>	<i>County Development Plan 2022-2028 Proposed Residential Yield</i>																											
<u><i>Infill/Windfall – Sites under Construction</i></u>	<u><i>35.63</i></u>	<u><i>1,837</i></u>	<u><i>35.63</i></u>	<u><i>1,837</i></u>																											
<u><i>Infill/Windfall – Sites with an extant planning permission not commenced</i></u>	<u><i>63.1</i></u>	<u><i>1,299</i></u>	<u><i>63.1</i></u>	<u><i>1,299</i></u>																											
<u><i>Infill/Windfall – Sites with no planning permission</i></u>	<u><i>67.13</i></u>	<u><i>1,436</i></u>	<u><i>67.13</i></u>	<u><i>1,436</i></u>																											
<i>Infill/Windfall</i>	<i>165.86</i>	<i>4,571</i>	<i>165.86</i>	<i>4,571</i>																											
<i>Ballyogan &amp; Environs</i>	<i>71.8</i>	<i>4,147</i>	<i>71.8</i>	<i>4,147</i>																											

Observations, Submissions and Recommendations	Executive’s Response & Recommendation				
<p>Having regard to the requirements of the NPO 72a, NPO 72b and NPO 72c, the planning authority is required to revisit its Infrastructure Assessment (Appendix 1 of the Draft Plan) to differentiate between tier 1 and tier 2 lands and other lands, and regarding the timeline (to the end of the 6 year plan period) and the estimated cost of delivery of necessary infrastructure to accommodate the development of the subject sites, in respect of:</p> <p>i) Infill/windfall sites with no planning permission (table 7). The planning authority is requested to use this information to make an evidence based determination regarding the potential residential yield to be achieved on the said sites over the plan period. This information should be incorporated into the core strategy (table 2.10) to enable the residential yield for infill/windfall sites under construction/sites with extant planning permission separately from infill/windfall sites with no planning permission.</p> <p>ii) New residential community: Old Connaught and Rathmichael. It would appear unlikely that the extensive critical enabling infrastructure can (and will) be available within the period of the plan. The designation of these lands as tier 2 does not appear to be justified and therefore the planning authority should review its intention to zone same for development during the period of the plan.</p>	<b>Woodbrook-Shanganagh</b>	29.53	1,998	29.53	1,998
	<b>Kiltiernan-Glenamuck</b>	59.34	2,015	59.34	2,015
	<b>Old Connaught</b>	50.13	2,005	50.13	2,005
	<b>Rathmichael</b>	83.05	2,431	83.05	2,431
	<b>DLR Total (excluding Cherrywood)</b>	459.73	17,167	459.73	17,167
	<b>Cherrywood</b>	93.55	5,596 - 8,186	93.55	5,596 - 8,186
	<b>DLR County Total</b>	553.28	22,763 – 25,353	553.28	22,763 – 25,353
	<b><u>Less Actual and Estimated Completions Q1 2020 to Q1 2022</u></b>				<b><u>1,877</u></b>
	<b><u>Adjusted Total</u></b>				<b><u>20,886 – 23,476</u></b>
	<b><u>HST Housing Target Q2 2022 to Q1 2028</u></b>				<b><u>15,225</u></b>
	<b><u>DLR Housing Target Q2 2022 to Q1 2028 (2022-2028) (Inclusive of ‘Headroom’)</u></b>				<b><u>20,669</u></b> <b><u>18,515</u></b>
	<b><u>Excess</u></b>				<b><u>2,094 – 4,684</u></b> <b><u>2,371 – 4,961</u></b>
	<p><b>OPR Recommendation 5(ii)</b>  <b>New residential community: Old Connaught and Rathmichael. It would appear unlikely that the extensive critical enabling infrastructure can (and will) be available within the period of the plan. The designation of these lands as tier 2 does not appear to be justified and therefore the Planning Authority should review its intention to zone same for development during the period of the plan.</b></p> <p><b>OPR Recommendation 5(ii): Executive’s Response</b>                      National Policy Objective 72a requires Planning Authorities to apply a standardised, two-tier approach to differentiate between: zoned land that is serviced; and, zoned land that is serviceable within the life of the County Development Plan. With regard to Tier 2 zoned land the specific wording contained in Appendix 3 of the NPF is as follows:</p>				

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
	<p><i>‘This zoning comprises lands that are not currently sufficiently serviced to support new development but <b>have potential to become fully serviced within the life of the plan</b> i.e. the lands are currently constrained due to the need to deliver some or all development services required to support new development, i.e. road or footpath access including lighting, foul sewer drainage, surface water drainage, water supply and/or additional service capacity.’</i></p> <p>Based on the NPF definition, the threshold for designation of lands as Tier 2 lands is not that the lands <u>will</u> be serviced during the lifetime of the Plan, but rather, that the lands <u>have the potential</u> to become fully serviced during the lifetime of the Plan.</p> <p>To support the designation of Tier 2 lands, the NPF requires the County Development Plan to carry out an assessment of the required infrastructure to support any Tier 2 lands and provides that the assessment must be aligned with the delivery program of relevant infrastructure providers. In accordance with this requirement, Section 4.7 of the Infrastructure Assessment included in Appendix 1 sets out the strategic enabling infrastructure required to facilitate growth at both Rathmichael and Old Connaught and covers water infrastructure, wastewater infrastructure and transport infrastructure. As required, each of the infrastructure projects and programmes are aligned with the delivery program of the relevant infrastructure providers – primarily the NTA and Irish Water. The primary projects include:</p> <ul style="list-style-type: none"> <li>• The Old Connaught-Woodbrook Water Supply Scheme – Planning permission was granted for this scheme in 2019 and the project is identified in the Irish Water Investment Plan 2020 to 2024.</li> <li>• The Bray/Shanganagh Drainage Area Plan – Irish Water are nearing completion of the Drainage Area Plan which includes the identification of foul drainage connections across the M11/N11 to connect with the Shanganagh wastewater treatment plant which is currently operating below design capacity.</li> <li>• Bray and Environs Transport Study (2019) – This Study, prepared by the NTA, sets out the transport objectives required to support the development of Bray and Environs, which includes residential zoned lands at Old Connaught and Rathmichael. The Study establishes a preferred approach which identifies a number of local transport infrastructure projects to serve both Old Connaught and Rathmichael. Importantly, the stated timeline for the implementation of the preferred approach is 2019-2027 (within the lifetime of the County Development Plan). The main projects include:</li> </ul>

Observations, Submissions and Recommendations	Executive's Response & Recommendation
	<ul style="list-style-type: none"> <li>• Upgrade of Ferndale Road including upgrades to local roads to facilitate bus, pedestrian and cycle movements.</li> <li>• A new link road from Ferndale Road to Dublin Road at Shanganagh.</li> <li>• Cherrywood to Rathmichael Link Road.</li> <li>• The phased introduction of bus services in line with increased demand.</li> </ul> <p>The Local Authority have been working closely with the NTA, TII and Irish Water over a significant period of time with regards to strategic enabling infrastructure delivery in the south east of the County. It should be noted that neither the NTA or Irish Water raised any concerns in their submissions on the Draft Plan in relation to the new residential communities at Old Connaught and Rathmichael. Both infrastructure providers were consulted with in terms of the preparation of this response and the delivery of infrastructure remains as set out in the Infrastructure Assessment included in Appendix 1.</p> <p>The Infrastructure Assessment prepared for the Draft Plan highlights the designation of Old Connaught in the RSES for future growth as part of the westward expansion of the 'Key Town' of Bray and its designation for residential development in the Dublin MASP on the North-South (DART) strategic development corridor. One of the primary purposes of the Dublin MASP is to provide a sequencing of infrastructure priorities to promote greater co-ordination between Local Authorities, public transport and infrastructure providers for the phased delivery of sites, and in this context, it is highlighted that Table 5.1 of the MASP specifically provides the phasing / enabling infrastructure requirements for Old Connaught as short (2026) to medium term (2031).</p> <p>The following extract comprises the commentary provided by the OPR in support of its <b>Recommendation</b></p> <p><i>'Where critical enabling infrastructure cannot realistically be available within the period of the plan, the zoning of such lands is not justified under the NPO 72a. In this regard <u>the Office supports TII's concerns regarding the inclusion of Cherrywood to Rathmichael link road and Ferndale Road to Dublin Road, and Shanganagh link road in tables 5.3 and 5.4 of the Draft Plan prior to an evaluation as prescribed under section 7 of the Spatial Planning and National Roads Guidelines (2012).</u>'</i></p> <p>Section 1.1 of the NTA's Bray and Environs Transport Study (2019) sets out the approach taken to the Transport Study and states:</p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
	<p><i>‘The approach taken was to set out the local interpretation of the NTA’s Transport Strategy for the Greater Dublin Area and <b><u>DPHLG’s Spatial Planning and National Roads Guidelines for Planning Authorities</u></b> and to express, in an integrated manner, the transportation policies and objectives of Wicklow County Council and Dún Laoghaire-Rathdown County Council, as contained in their County Development Plans and local area plans.’.</i></p> <p>The Executive notes the issue raised by the TII, as referred to by the OPR, which is responded to in Section 5.3.2 of this Report. As part of the Executive’s response on the matter, it is recommended that the road proposals are dependent on further assessment as set out in the ‘Spatial Planning and National Roads Guidelines for Planning Authorities’, the NTA’s Transport Strategy for the Greater Dublin Area 2016 -2040 and the forthcoming Transport Strategy for the Greater Dublin Area, and the provisions of the Bray and Environs Transport Study (2019).</p> <p>It is highlighted that the submission received from the TII on the Draft Plan does not support the position that the subject lands cannot be serviced – from a transportation perspective - within the lifetime of the Plan. To the contrary, the TII collaborated with the NTA, DLR County Council and Wicklow County Council in completing the study. It is acknowledged that additional assessment will be required to be undertaken to finalise the transport framework for the area, however, the Executive does not agree with the contention of the OPR that the reservations of the TII should be inferred as meaning the lands cannot be serviced within the lifetime of the Plan. The Bray and Environs Transport Study, prepared by the NTA in collaboration with the key stakeholders including the TII, clearly outlines that the lands <b><u>have the potential to become fully serviced within the life of the plan.</u></b></p> <p>As provided under the LAP programme contained in Table 2.15, it is the intention of the Council to prepare Local Area Plan’s for both of these new communities during the lifetime of the Plan. As noted in the Draft Plan it is intended that implementation plans incorporating phasing programmes are to be prepared as part of the Local Area Plan making process, linking development with the commensurate delivery of supporting infrastructure. The LAP plan-making process will incorporate a more detailed assessment of these areas including the use of Area Based Transport Assessments which integrate national and regional transport policies and objectives into local level land use plans.</p> <p>It is considered that the Infrastructure Assessment included in Appendix 1 of the Draft Plan provides a comprehensive justification for the inclusion of Old Connaught and Rathmichael as Tier 2 lands. As</p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
	<p>required under the NPF, each of the strategic infrastructure projects and programmes are aligned with the delivery program of the relevant infrastructure providers. Neither the NTA or Irish Water has raised any concerns in relation to the infrastructure projects included in the Infrastructure Assessment to support residential development in this area. Furthermore, enabling infrastructure requirements for Old Connaught are identified in the Dublin MASP for the short to medium term. It is considered that the submission from the OPR does not provide any evidence which would support its contention that the subject lands cannot be serviced within the lifetime of the Plan.</p> <p>Based on the analysis undertaken, the Executive are satisfied that both Old Connaught and Rathmichael meet the threshold for Tier 2 lands as provided for in the NPF and have potential to become fully serviced within the life of the Plan.</p> <p>The submission from the OPR also highlights the provisions of NPO 72b of the NPF and states that ‘...the cost of delivery of the specified infrastructure (and for all relevant infrastructure) is required to be detailed as part of the Infrastructure Assessment.’. It is highlighted that every effort was made to include costings where a verifiable source for same was identified. These cost estimates are already included in a number of the Tables included in the Infrastructure Assessment. The Local Authority is not in a position to undertake any additional analysis of cost for major infrastructure projects that are not within its own delivery remit.</p> <p><b>OPR Recommendation 5(ii): Executive’s Recommendation</b> No change to Draft Plan.</p>
<b>Economic Development and Employment (including retail)</b>	
<b>2.1.9 Retail floorspace</b>	
<ul style="list-style-type: none"> <li>i) The Office notes that the Retail Planning Guidelines (2012) do not require a separate County retail strategy where a County is part of a joint strategy but does require the plan to be evidence-based.</li> <li>ii) Submission provides commentary on the policy approach in the Draft Plan which includes any future update of the retail hierarchy and an overall cautionary approach.</li> </ul>	<p>The Executive note and welcome the observation made by the OPR and notes that observations should be actioned. To comply with the observation of the OPR it is recommended that the observation be actioned in the Draft Plan.</p> <p>The Planning Authority respectfully consider that the observation which suggests carrying out a broad assessment of the existing retail floorspace in the County and comparing it with the projected figures for 2021 as set out in the Retail Strategy for the Greater Dublin Area 2008-2016, so as to inform policy on</p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
<p>iii) Submission questions the applicability of the current Strategy but does note that it allows a comparison of the projected 2021 floor space against the actual retail floorspace now existing in the County.</p> <p>iv) The Draft Plan provides no indication of the existing retail floorspace, or the projected increase over the plan period.</p> <p><b>Observation 1 – Retail Strategy</b></p> <p><b>The Retail Planning Guidelines (2012) require the development plan’s provisions for retail to be evidence-based. In the absence of an updated of the Retail Strategy for the GDA, it is suggested that the planning authority could demonstrate an evidence-based approach through the inclusion of a broad assessment of the existing retail floorspace in the County. In comparison with the projected figures for 2021 set out in the Retail Strategy for the Greater Dublin Area 2008-2016, the baseline data could be used to inform the Council’s strategic guidance on the appropriate location and scale of retail development and the development management criteria of the plan.</b></p>	<p>location and scale of retail, comprises a body of work that would have been more appropriate to have been carried out at pre-draft stage prior to the preparation of the Draft Plan. It is a body of background work that it was not envisaged could be carried out in any meaningful way in the statutory time that is available for the preparation of the Chief Executives Report on the Draft Plan.</p> <p>The Draft Plan does not designate any new retail locations over and above those that are already contained in the current Plan. Since the adoption of the 2016 Plan the main retail schemes to have been permitted include the district centre development at Cherrywood which will serve the new planned communities within the Planning Scheme area, the neighbourhood centre facilities at Carrickmines which will serve the new planned communities in the surrounding area and new neighbourhood centre facilities at Shankill. Extensions and refurbishments have also been permitted at Stillorgan and Blackrock.</p> <p>It is accepted that the comparison may be a useful exercise to carry out as a precursor to the review to the regional retail strategy.</p> <p><b>Recommendation</b> Action Observation 1 as follows;</p> <p>Amend Chapter 7 as follows; Insert new Policy Objective as follows:</p> <p><i><u>“Policy Objective RET3: Assessment of existing retail floor space It is a Policy Objective of the Council that in positioning the Local Authority for the preparation of a new GDA retail strategy, the Planning Authority shall commence a broad assessment of the existing retail floorspace in the County, including comparing the results with the projected figures for 2021 as set out in the Retail Strategy for the Greater Dublin Area 2008-2016 and reflecting the changing role of centres and their importance in meeting the needs of the ten minute neighbourhood.”</u></i></p> <p>Amend numbering of all subsequent Policy Objectives and sections and references in Chapter 7 and other Chapters.</p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
<b>2.1.10 Retail Hierarchy</b>	
<p>i) Submission provides commentary on the definition of a neighbourhood centre.</p> <p>The Office of the Planning Regulator notes the proposals to promote a number of larger neighbourhood centres as local mixed-use nodes capable of accommodating a range of uses beyond simply retailing or retail services and considers that this may conflict with government guidelines.</p> <p>The Draft Plan specifically refers to the Leopardstown Valley, Ballyogan, zoned objective NC. It also refers to neighbourhood centres identified through Local Area Plans at Woodbrook-Shanganagh, Kiltiernan and Old Conna, and to Carrickmines</p> <p><b>Recommendation 6 – Retail hierarchy</b>  <b>Having regard to the Retail Planning Guidelines (2012), the planning authority is required to revisit its intended approach to the future development of the neighbourhood centres tier in terms of the scale and nature of retail and associated uses proposed to be accommodated, to ensure consistency with the provisions of the guidelines</b></p> <p>The submission sets out detail in relation to the proposed neighbourhood centre at Carrickmines and set out details of the permission granted.</p> <p>Submission states that Section 2.7 of the Spatial Planning and National Roads Guidelines (2012) require that</p>	<p>The Office of the Planning Regulator have recommended that the Planning Authority revisit the approach to the future development of neighbourhood centres in terms of the scale and nature of retail and associated uses to be accommodated to ensure consistency with the Section 28 Guidelines.</p> <p>The OPR have expressed concern in relation to the statement in section 7.5.4 of the Draft Plan which states that</p> <p><i>“The Council considers that, subject to the protection of residential amenities, a number of the larger Neighbourhood Centres are capable of being promoted as local mixed-use nodes accommodating a range of uses beyond simply retailing or retail services. Leopardstown Valley would be one such Neighbourhood Centre which already offers a mix of commercial, retail and community infrastructure uses and has potential for more development to serve the area”.</i></p> <p>The 2012 “Guidelines for Planning Authorities; Retail Planning” only contains 3 references to neighbourhood centres as follows;</p> <p>Neighbourhood centres are referred to in the context of local retail units as follows</p> <p><i>“4.11.6 Local Retail Units</i></p> <p><i>Local retail units such as corner shops or shops located in local or neighbourhood centres serving local residential districts perform an important function in urban areas. Where a planning authority can substantiate the local importance of such units in defined local centres, they should safeguard them in development plans, through appropriate land-use zoning. Development management decisions should support the provision of such units, particularly where they encompass both food-stores and important non-food outlets such as retail pharmacies and have significant social and economic functions in improving access to local facilities especially for the elderly and persons with mobility impairments, families with small children, and those without access to private transport.”</i></p> <p>The guidelines define a neighbourhood centre as follows</p> <p><i>“Local Centre or Neighbourhood Centre</i></p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
<p>development plans take account of and carefully manage development in the vicinity of interchanges/junctions on national road and motorways.</p> <p>Submission sets out that TII has raised concern about the potential impact on the M50 from traffic generation of the future development of Ballyogan LAP, including Carrickmines, in addition to the development of Kiltiernan-Glenamuck and Cherrywood SDZ.</p> <p>The Office supports TII’s recommendation that the policies of the SPNRG and the RPG, in particular, concerning the protecting of the capacity of the strategic road network should be clearly reflected through the amendments to the Draft Plan in Section 7.6 Assessment of Retail Development Proposals; Section 12.6 development management for large good stores; and SLO 82.</p>	<p><i>Comprise a small group of shops, typically comprising newsagent, small supermarket/ general grocery store, sub-post office and other small shops of a local nature serving a small, localised catchment population.”</i></p> <p>The final reference is in terms of a definition of the term centre and is not considered of relevance for this review exercise.</p> <p>It is acknowledged that the references in the Guidelines indicate relatively small scale retail provision, however the references in the Draft Plan to additional development in the NC zoning objective, are to non-retail uses in the NC zoning objective. The guidelines are silent on non-retail/associated uses in neighbourhood centres.</p> <p>Other national policy is also important namely National Strategic Objective 1 of the NPF - Compact Growth. Planned development in DLR in both the existing built up are and in new communities which falls within identified strategic growth corridors as set out in the MASP will be compact growth. Chapter 6 of the NPF People, Homes and Communities sets out elements required to support quality of life for communities. Neighbourhood centres have a role to play beyond the simple provision of retail and retail services. For example, in the aforementioned Leopardstown Valley Neighbourhood centre, permission has recently been granted for a nursing home (D20A/0408) which is considered to be a sustainable use in a local setting. The fact that the additional uses are not retail or retail services ensures full consistency with the 2012 Guidelines in terms of nature and scale of retail provision.</p> <p>In terms of revisiting the overall approach to the future development of neighbourhood centres the planning authority wish to draw the attention of the OPR to the overarching vision of the Plan along with the 5 Strategic County Outcomes set out in Chapter 1. One of the five overarching Strategic County Outcomes of the Draft Plan which was informed by a Strategic Direction from the elected members is the <i>“Creation of a network of liveable towns and villages”</i>. The outcome is very much connected in with other outcomes, namely creation of a climate resilient County and creation of a compact and connected County. The overall policy thrust of the plan is about making towns and villages in the County work better for those who live in them. To deliver on the ten-minute neighbourhood concept the planning authority envisage neighbourhood centres playing a critical and enhanced role in the provision of local services beyond simply retail, that people can access without having to use the private car, a really good example being the</p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
	<p>nursing home referenced above Whilst having regard to the Section 28 Guidelines the planning authority consider that Neighbourhood centres have a role that is wider than the relatively narrow definition provided in the Guidelines which only relates to their retail role and appears to be set more within the definition of local shops. The list of uses permitted in principle and open for consideration as set out in table 13.1.12 “Neighbourhood Centres” reflects this policy thrust.</p> <p>The new focus of Chapter 7 “<i>Towns, Villages and Retail Development</i>” includes Policy Objectives which embrace the changing retail policy environment whereby it is recognised that towns and villages are about significantly more than retail and in fact serve a multi-functional role for people in their community. As set out in section 7.2.2 of the Draft Plan “<i>research from the UK indicates that out of town, one shop food shopping is declining in favour of convenient, local neighbourhood shopping</i>”. The Draft Plan states that “<i>A shift towards a more multifunctional role could enable local centres to provide more niche retail and community services in smaller units which may previously have been vacant. It could also benefit the smaller, bespoke shops which help to enhance the character of the County.</i>” Policy Objectives MFC1 Multifunctional Centres states that</p> <p><i>“It is a Policy Objective of the Council to embrace and support the development of the County’s Major Town Centres, District Centres and Neighbourhood Centres as multifunctional centres which provide a variety of uses that meet the needs of the community they serve.”</i></p> <p>The subsequent reference in section 7.5.4 to certain Neighbourhood centres being capable “<i>of being promoted as local mixed-use nodes accommodating a range of uses beyond simply retailing or retail services</i>” follows on from this informed policy background. As previously set out these additional associated uses are “beyond retail and retail services” thus ensuring no conflict with the 2012 Guidelines in terms of nature and scale of retail uses.</p> <p>In revisiting the approach to the future development of neighbourhood centres in the County the following is of note;</p> <p>Of the circa 70 hectares that are zoned NC in the County, there are significantly more in number and area that fall within what is termed the existing built up area – 58 (83%) in the existing built up area versus 12 hectares (17%) in the areas termed new residential communities in the core strategy (Cherrywood SDZ area is not included).</p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
	<p>Within the County, there is significant variety of sizes in terms of the areas which carry the NC zoning objective. Some of this is historical in that within the existing built up area there are relatively small sites which carry the NC zoning objective, for example the small parade of shops on Lakelands Road in Kilmacud or the parade of shops at the Supervalu in Mount Merrion.</p> <p>Some villages which contain a larger area with the NC zoning objective successfully serve a local community by allowing sustainable access via public transport, on foot or by bicycle to a range of local services, examples include Deangrange Village and Shankill Village both of which contain a good range of retail and nonretail uses that would go beyond a simple parade of shops. They also adjoin areas with the new SNI objective where schools, libraries and community uses are provided.</p> <p>From a spatial examination of the distribution of the NC zoning objective there is a difference between the built up area and the areas that are termed new communities</p> <p>Within the built up area, the NC zoning objective may pertain to much smaller sites which are in very close proximity to one another, the two parade of shops either end of Bird Avenue, Clonskeagh being a good example. There is a much more liberal spread of the NC zoning objective, and it may cover a single premises a public house, (Sallynoggin Inn), retail services, a parade of shops or a super market.</p> <p>Within the built up area there are other local services which may be located in close proximity to the NC zoning objective and which contribute to the local provision of services. For example, the light industry and offices located adjacent to the NC zoning objective on Newtown Park Avenue, Blackrock or the Business Park in Deansgrange.</p> <p>In areas termed new communities, in many instances there are no additional community, retail, retail services, office or other employment uses dotted throughout the surrounding area as these areas are developing and evolving.</p> <p>As part of the review of the 2010 - 2016 County Plan and the preparation of the current 2016 – 2022 County Development Plan, the area subject to the NC zoning objective in Sallynoggin was reduced and an area subject to the NC zoning objective in Kiltiernan was removed.</p> <p>A spatial examination of the retail hierarchy in the County also highlights how both of the Major Town Centres of Dundrum and Dún Laoghaire and 4 out of the 5 District centres, Stillorgan, Blackrock, Nutgrove and Cornelscourt are located in the existing built up area. The 5<sup>th</sup> at Cherrywood is under construction and</p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
	<p>is a facility that will primarily serve the new community both residential and employment, in the Cherrywood area.</p> <p>As required by the Planning and Development Act the Planning Authority have had regard to the Section 28 Guidelines when formulating the Draft Plan policy.</p> <p>In conclusion, having revisited the approach to future development of the neighbourhood centre tier in terms of the scale and nature of retail and associated uses as required by <b>Recommendation</b> number 6 of the OPR submission the Planning Authority are satisfied that some larger areas which carry the NC zoning objective, and particularly those within what are termed new community areas have a role to play and capacity as mixed use nodes, in terms of local sustainable climate resilient development.</p> <p>The Planning Authority are satisfied that this approach is fully consistent with the Guidelines as these associated uses are beyond retail and retail services.</p> <p>(See section 3.7 for response to TII issues relating to location of Retail Proposals)</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p><b>Sustainable Transport and Movement</b></p>	
<p><b>2.1.11 Mode share</b></p>	
<p>i) Submission:</p> <ul style="list-style-type: none"> <li>● Considers the overall policy approach of the Draft Plan to be consistent with the implementation of sustainable settlement and transport strategies under section 10(2)(n) of the Act.</li> <li>● Welcomes the Avoid-Shift-Improve approach and the alignment of policies with the approach in Chapter 5.</li> <li>● Recognises the significant advances of the County in terms of active travel and public transport</li> </ul>	<p>The Office of the Planning Regulator recognises that the overall policy approach of the Draft is consistent with the implementation of sustainable settlement and transport strategies under section 10(2)(n) of the Act and welcomes the proposal to monitor mode share. However, the Regulator has recommended that the Planning Authority in consultation with the NTA, include appropriate baseline figures for modal share for the County, or its constituent parts, as appropriate and realistic targets for modal change against the baseline figures provided to increase the effectiveness of the implementation monitoring regime proposed under Chapter 15 of the Draft Plan. Following on from this the Planning Authority is asked to consider whether any amendments to proposed Policy Objective or development management standards are appropriate to ensure the implementation of sustainable settlement and transport strategies through the development plan.</p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
<p>infrastructure and therefore is well placed to achieve the national targets of Smarter Travel (2009).</p> <ul style="list-style-type: none"> <li>• Welcomes the proposal to include the monitoring of mode share, but notes that there are no targets, which would provide a clear focus for the implementation of the Council’s transport and movement strategy.</li> </ul> <p><b>Recommendation 7 - Sustainable transport and modal shift</b></p> <p><b>In order to ensure the effective planning, implementation and monitoring of the development plan requirements under section 10(2)(n), the planning authority is required, in consultation with the NTA, to include:</b></p> <ul style="list-style-type: none"> <li>i) <b>Appropriate existing baseline figures for modal share for the County, or its constituent parts, as may be appropriate,</b></li> <li>ii) <b>Realistic targets for modal change against the baseline figures provided under (i), above, to increase the effectiveness of the implementation monitoring regime proposed under Chapter 15 of the Draft Plan.</b></li> </ul> <p><b>The planning authority should consider, in view of the information provided under (i) and (ii), whether any amendments to proposed Policy Objective or development management standards are appropriate to ensure the implementation of sustainable settlement and transport strategies through the development plan.</b></p>	<p>The Planning Authority has consulted with the NTA in the preparation of the Draft Plan and for the purpose of responding to the submissions to the Draft, including the submission of the OPR.</p> <p>Discussions with the NTA centered around the role of the Council as a facilitator rather than a direct provider of some sustainable transport networks while the role of the NTA is to develop and implement a transport strategy for the Greater Dublin Area.</p> <p>Further to these discussions it is proposed to add a Table 5.0 and text to Plan, as set out below. This sets out the travel mode share for travel to work, school and college based on the 2016 Census data. It is acknowledged that this is dated and limited in that it only relates to journey to work or school so does not cover the multitude of other trips that take place in the County outside of the peak hour.</p> <p>The Draft Plan is underpinned by 5 strategic County Outcomes, one of which is creation of a compact and connected County. The focus is very much on matching land use and transport, reducing the need to travel by private car and not increasing traffic. Following consultation with the NTA and accepting that the plan is about giving the population of the County sustainable transport choices as opposed to dictating that a certain % must be by a certain mode, the NTA and the Planning Authority are cautious about setting further targets.</p> <p>Achieving modal change requires behavioural change, the improvement of the components of sustainable transport infrastructure and demand management. The Council works closely with all stakeholders to achieve this.</p> <p>The locus of control of the Planning Authority is via the overarching policy approach of the Draft Plan which is centered on promoting the ten minute neighborhood and compact climate resilient communities where people have the options to use public transport and the softer modes for everyday trips. The Council can also utilise demand management measures such as car and cycle parking standards. In this regard the Draft Plan has introduced an ambitious new carparking policy (Policy Objective T18: Car Parking Standards and Section 12.4.5 Car parking Standards and Map T2) and also cycle parking requirements (12.4.6 Cycle Parking) to complement the existing Council Cycle Standards (<i>Standards for Cycle Parking and Associated Cycle Parking Facilities for New Developments</i>, 2018) which are recognised to be exemplar.</p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
	<p>The cycle parking standards will be refined further during the lifetime of the Plan to align with the carparking zones.</p> <p>At the local plan level, the incorporation of the Area Based Transport Assessment (ABTA) process, prepared in consultation with transport agencies has an important role to play in identifying measures to be incorporated into Local Area Plans which can positively influence demand and modal choice.</p> <p>The Council is committed to increasing active and public transport mode share and supports national policy as set out in Smarter Travel including the mode share targets contained therein. With regards to the recommendation to set travel mode share targets, the NTA advise to include a single modal share travel target of 10% for cycling which is consistent with the National Cycle Policy Framework 2009. This is very much a minimum standard, as the cycle network is being designed with the capacity to accommodate a mode share which could exceed this target in due course as the County and GDA Cycle Network is further rolled out.</p> <p>With regard to Smarter Travel Policy and modal share targets this is supported by the existing Policy Objective T3 which states:</p> <p><i>“It is a Policy Objective to promote, facilitate and cooperate with other transport agencies in securing the implementation of the transport strategy for the County and the wider Metropolitan Area as set out in Department of Transport’s ‘Smarter Travel, A Sustainable Transport Future 2009 –2020’ <b>including the modal share targets</b> and the NTA’s ‘Greater Dublin Area Transport Strategy 2016-2035’, the RSES and the MASP”</i></p> <p>The Department of Transport, in their submission to the Draft states:  <i>“The Department of Transport welcomes the comprehensive Dún Laoghaire-Rathdown draft County Development Plan 2022-2028. As outlined in our previous submission, the Department is developing a new national sustainable mobility policy which will be published later this year. Many of the key policy approaches on sustainable mobility in the Draft Plan align with the key areas being considered in the development of the new sustainable mobility policy such as the importance of integrating land use and transport policies and the application of the Avoid-Shift-Improve principle as part of the transition to a climate resilient society.”</i></p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
	<p>It is anticipated that the modal share targets set out in Smarter Travel will be updated to reflect new sustainable mobility policy which will align with the Governments evolving Climate Action Policy and the sectoral requirements to respond to this. It is proposed in this CE’s report to amend the Draft accordingly, as per the submission of the Department of Transport as follow:</p> <p><i>“It is a Policy Objective to promote, facilitate and cooperate with other transport agencies in securing the implementation of the transport strategy for the County and the wider Metropolitan Area as set out in Department of Transport’s ‘Smarter Travel A Sustainable Transport Future 2009 –2020’ including the modal share targets, to be replaced with the forthcoming ‘National sustainable mobility policy’ and the NTA’s ‘Greater Dublin Area Transport Strategy 2016-2035’ and the forthcoming GDA Transport Strategy, the RSES and the MASP.”</i></p> <p>It should be noted that the issue of mode share targets has been dealt with in the Sandyford Urban Framework Plan and the Cherrywood Planning Scheme. With regard to the Sandyford Urban Framework Plan Objective TAM 1 requires that all future development achieve a peak hour transport mode split of 45 % trips by Car Driver and 55% by sustainable modes (walking, cycling and public transport). Cherrywood Planning Scheme, which is separate to the County Development Plan, has a modal share target for the planning scheme area in line with Smarter Travel of 55 % trips by sustainable modes (minimum) and 45 % by car driver (maximum).</p> <p>In conclusion, in view of the advice of the NTA, the role of the Local Authority and the forthcoming replacement of ‘Smarter Travel’ it is considered appropriate to add in a minimum 10 % mode share target for cycling under Policy Objective T3 under Monitoring and Evaluation. As outlined above, the overall policy thrust of the Draft Plan which is underpinned by the 5 strategic County outcomes set out in Chapter 1 is centered around the concept of the ten minute neighbourhood and the creation of compact, climate resilient communities where all trips can be made by sustainable modes. No additional changes to the Policy Objectives or development management standards are considered warranted to ensure the implementation of sustainable settlement and transport strategies through the development plan.</p> <p><b>Recommendation</b>  Insert Table 5.0 after the Second paragraph on page 100:</p> <p><b>5.3 Commuting Travel Mode Share Trends</b></p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation																																																																	
	<p data-bbox="920 316 2074 379"><i>In terms of current commuting, the travel mode share (as detailed in Census 2011 and 2016) for all trips to work, school or college for residents of Dún Laoghaire- Rathdown is shown in Table 5.0.</i></p> <p data-bbox="920 416 1727 443"><b>Table 5.0 Means of Travel to Work, School or College for Residents in DLR</b></p> <table border="1" data-bbox="916 443 1809 1262"> <thead> <tr> <th data-bbox="920 448 1167 564"><i>Means of Travel</i></th> <th data-bbox="1167 448 1301 564"><b>2011</b></th> <th data-bbox="1301 448 1413 564"><b>% of Total</b></th> <th data-bbox="1413 448 1547 564"><b>2016</b></th> <th data-bbox="1547 448 1675 564"><b>% of Total</b></th> <th data-bbox="1675 448 1809 564"><b>2011-2016 Change</b></th> </tr> </thead> <tbody> <tr> <td data-bbox="920 564 1167 608"><b>On Foot</b></td> <td data-bbox="1167 564 1301 608">17,462</td> <td data-bbox="1301 564 1413 608">14%</td> <td data-bbox="1413 564 1547 608">18,387</td> <td data-bbox="1547 564 1675 608">14%</td> <td data-bbox="1675 564 1809 608">925</td> </tr> <tr> <td data-bbox="920 608 1167 651"><b>Bicycle</b></td> <td data-bbox="1167 608 1301 651">6,723</td> <td data-bbox="1301 608 1413 651">5%</td> <td data-bbox="1413 608 1547 651">8,864</td> <td data-bbox="1547 608 1675 651">7%</td> <td data-bbox="1675 608 1809 651">2,141</td> </tr> <tr> <td data-bbox="920 651 1167 767"><b>Bus/Minibus/Coach</b></td> <td data-bbox="1167 651 1301 767">13,796</td> <td data-bbox="1301 651 1413 767">11%</td> <td data-bbox="1413 651 1547 767">15,180</td> <td data-bbox="1547 651 1675 767">11%</td> <td data-bbox="1675 651 1809 767">1,384</td> </tr> <tr> <td data-bbox="920 767 1167 858"><b>Train/DART/LUAS</b></td> <td data-bbox="1167 767 1301 858">15,646</td> <td data-bbox="1301 767 1413 858">12%</td> <td data-bbox="1413 767 1547 858">19,040</td> <td data-bbox="1547 767 1675 858">14%</td> <td data-bbox="1675 767 1809 858">3,394</td> </tr> <tr> <td data-bbox="920 858 1167 938"><b>Motorcycle</b></td> <td data-bbox="1167 858 1301 938">937</td> <td data-bbox="1301 858 1413 938">1%</td> <td data-bbox="1413 858 1547 938">861</td> <td data-bbox="1547 858 1675 938">1%</td> <td data-bbox="1675 858 1809 938">-76</td> </tr> <tr> <td data-bbox="920 938 1167 1018"><b>Car (Driver)</b></td> <td data-bbox="1167 938 1301 1018">49,558</td> <td data-bbox="1301 938 1413 1018">39%</td> <td data-bbox="1413 938 1547 1018">50,021</td> <td data-bbox="1547 938 1675 1018">37%</td> <td data-bbox="1675 938 1809 1018">463</td> </tr> <tr> <td data-bbox="920 1018 1167 1139"><b>Car (Passenger)</b></td> <td data-bbox="1167 1018 1301 1139">19,560</td> <td data-bbox="1301 1018 1413 1139">16%</td> <td data-bbox="1413 1018 1547 1139">20,614</td> <td data-bbox="1547 1018 1675 1139">15%</td> <td data-bbox="1675 1018 1809 1139">1,054</td> </tr> <tr> <td data-bbox="920 1139 1167 1219"><b>Van/lorry/other</b></td> <td data-bbox="1167 1139 1301 1219">2,419</td> <td data-bbox="1301 1139 1413 1219">2%</td> <td data-bbox="1413 1139 1547 1219">2,466</td> <td data-bbox="1547 1139 1675 1219">2%</td> <td data-bbox="1675 1139 1809 1219">47</td> </tr> <tr> <td data-bbox="920 1219 1167 1262"><b>Total</b></td> <td data-bbox="1167 1219 1301 1262"><b><u>126,101</u></b></td> <td data-bbox="1301 1219 1413 1262"><b><u>100</u></b></td> <td data-bbox="1413 1219 1547 1262"><b><u>135,433</u></b></td> <td data-bbox="1547 1219 1675 1262"><b><u>100</u></b></td> <td data-bbox="1675 1219 1809 1262"><b><u>9,332</u></b></td> </tr> </tbody> </table> <p data-bbox="920 1299 1272 1326"><b>(Source: Census 2011 and 2016)</b></p>						<i>Means of Travel</i>	<b>2011</b>	<b>% of Total</b>	<b>2016</b>	<b>% of Total</b>	<b>2011-2016 Change</b>	<b>On Foot</b>	17,462	14%	18,387	14%	925	<b>Bicycle</b>	6,723	5%	8,864	7%	2,141	<b>Bus/Minibus/Coach</b>	13,796	11%	15,180	11%	1,384	<b>Train/DART/LUAS</b>	15,646	12%	19,040	14%	3,394	<b>Motorcycle</b>	937	1%	861	1%	-76	<b>Car (Driver)</b>	49,558	39%	50,021	37%	463	<b>Car (Passenger)</b>	19,560	16%	20,614	15%	1,054	<b>Van/lorry/other</b>	2,419	2%	2,466	2%	47	<b>Total</b>	<b><u>126,101</u></b>	<b><u>100</u></b>	<b><u>135,433</u></b>	<b><u>100</u></b>	<b><u>9,332</u></b>
<i>Means of Travel</i>	<b>2011</b>	<b>% of Total</b>	<b>2016</b>	<b>% of Total</b>	<b>2011-2016 Change</b>																																																													
<b>On Foot</b>	17,462	14%	18,387	14%	925																																																													
<b>Bicycle</b>	6,723	5%	8,864	7%	2,141																																																													
<b>Bus/Minibus/Coach</b>	13,796	11%	15,180	11%	1,384																																																													
<b>Train/DART/LUAS</b>	15,646	12%	19,040	14%	3,394																																																													
<b>Motorcycle</b>	937	1%	861	1%	-76																																																													
<b>Car (Driver)</b>	49,558	39%	50,021	37%	463																																																													
<b>Car (Passenger)</b>	19,560	16%	20,614	15%	1,054																																																													
<b>Van/lorry/other</b>	2,419	2%	2,466	2%	47																																																													
<b>Total</b>	<b><u>126,101</u></b>	<b><u>100</u></b>	<b><u>135,433</u></b>	<b><u>100</u></b>	<b><u>9,332</u></b>																																																													

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
	<p><i>There was an increase of 9,332 persons travelling to work, school or college in DLR between 2011 to 2016. The largest increase in the means of travel used over this period was by train/DART/LUAS that increased by 3,394 persons. There were also significant increases in cyclists (2,141), and to a lesser degree by those travelling by car (1,517) and travelling by bus/minibus/coach (1,384).</i></p> <p><i>While the car (driver and passenger) remained the dominant mode of transport with 52% of trips this is a 3% reduction of car use on the 2011 figure of 55%. The modal share target for car as set out in “Smarter Travel, A New Transport Policy for Ireland 2009-2020,” is 45 % car usage. The reduction of the car usage for commuting is therefore in the positive direction.</i></p> <p><i>The Smarter Travel Target for cycling is 10 %. The numbers of those cycling has experienced a significant increase from 6,723 persons in 2011 to 8,864 persons in 2016 and representing an increase from 5 to 7% of the mode share. Similarly, the numbers taking public transport has also increased from 23% in 2011 to 25% in 2016. These are encouraging figures and demonstrate a shift in travel mode share towards more sustainable modes of transport.</i></p> <p><i>In 2016, 85 % of households in the County had a car, which was a reduction from 86 % in 2011. However, when compared to Dublin as a whole, car ownership is still high in the County with 621 cars per 1,000 population versus 496 cars per 1,000 population for Dublin”.</i></p> <p><i>Amend the text on page 103 following Policy Objective T3: Development of Sustainable Travel and Transport:</i></p> <p><i>“The Department of Transport’s ‘Smarter Travel, A Sustainable Transport Future 2009-2020’ and the NTA’s Greater Dublin Area Transport Strategy 2016- 2035 set out an integrated and balanced sustainable transport strategy for the wider Dublin Region dealing with all sustainable travel modes (bus, rail, Luas, cycling and walking) and road transport as well as issues such as road safety, traffic management, accessibility, enforcement, social inclusion and guidance on complementary land use policies. The review of these two strategies has begun. <del>is to begin in 2021.</del> <u>The Smarter Travel car mode share target is to reduce the total share of car commuting from 65% to 45% and the cycling mode share target is 10 %.</u> The Council, acting primarily as facilitator rather than the direct provided of some sustainable transport networks, will have a significant role to play both in the development of an efficient transport system and in planning for the future transport needs of the County. In pursuing the objective of encouraging modal shift the Council will co-operate closely with other relevant agencies and stakeholders, including the NTA.</i></p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
	<p><i><u>Notwithstanding this the locus of control of the Planning Authority is via the overarching policy approach of the Draft Plan which is centered on promoting the ten minute neighborhood and compact climate resilient communities where people have the options to use public transport and the softer modes for everyday trips. The Council can also utilise demand management measures which includes car and cycle parking standards. In this regard the Plan has introduced a new carparking policy and associated standards (Policy Objective T18: Car Parking Standards and Section 12.4.5 Car parking Standards and Map T2) and also cycle parking requirements (12.4.6 Cycle Parking) to complement the existing Council Cycle Standards (‘Standards for Cycle Parking and Associated Cycle Parking Facilities for New Developments’, 2018). The cycle parking standards will be refined further during the lifetime of the Plan to align with the carparking zones.</u></i></p> <p>Add the following to Table 15.5.5 Transport and Mobility (page 339) Policy Objective T3 under the Monitoring and Evaluation Column:  <i>“Cycle mode share target: 10 %”</i></p>
<p><b>2.1.12 Strategic Transport Infrastructure</b></p>	
<p>i) Pursuant to the ‘Spatial Planning and National Roads Guidelines’ (2012), the planning authority is required to ensure that the strategic traffic function of national roads is maintained by limiting development which generate short trips on national road.</p> <p>The authority is required to assess trip generation of zoning objectives and how that these can be catered for by sustainable modes while protecting the strategic function of the national road network and their junctions. Submission notes that the TII has raised concerns with the proposed provisions of the plan in the vicinity of J14 and J15 of the M50.</p> <p>Highlights concerns regarding the development of lands in the Ballyogan and Environs LAP (BELAP), including</p>	<p>To fully respond to recommendation number 8 the preceding narrative set out in the OPR submission is important. The OPR submission notes that the Spatial Planning and National Roads Guidelines (2012) require the Planning Authority to ensure the strategic traffic function of national roads is maintained.</p> <p>The OPR submission notes that the TII has raised concerns around proposed provisions of the Draft Plan around junction 14 and 15. The OPR identifies the following areas as being in the vicinity of Junctions 14 and 15 – Cherrywood, Ballyogan and Environs, Carrickmines and Kiltiernan-Glenamuck. Sandyford which is in the vicinity of junction 14 has not been identified but for completeness it is also addressed. It is noted that all the lands in question are already zoned and have been zoned for development for over 17 years since at least 2004.</p> <p>The TII submission is referenced and it is therefore considered important to also address along with the NTA submission. In relation to the area in the vicinity of junction 14 and 15 the TII submission provides considerable detail in relation to the BELAP lands and particularly focuses on one undeveloped area,</p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
<p>Carrickmines, in conjunction with other major development areas such as Kiltiernan-Glenamuck LAP and Cherrywood SDZ.</p> <p>The BELAP is dependent on the M50 and Luas infrastructure for which it was not designed.</p> <p>Refers to the Council’s Infrastructure Assessment not requiring any infrastructural investment on the M50 or the Luas green line as necessary.</p> <p>Submission notes that the SEA does not refer to any potential for significant effects on the M50.</p> <p>OPR supports the recommendations of the TII regarding the need for a detailed assessment for this area to be carried out in accordance with the ABTA method.</p> <p><b>Recommendation 8 – Strategic transport infrastructure capacity</b>  <b>Having regard to the requirements of the Spatial Planning and National Roads Guidelines (2012), the planning authority is required to determine, through an evidence-based approach how the strategic traffic function of national roads will be maintained with the full extent of development proposed to be accommodated within the vicinity of J14 and J15 of the M50 under the Draft Plan.</b></p> <p><b>This should be carried out in consultation with TII and the NTA, having regard to the ABTA Guidance Notes (2018, TII publication PE-PDV-02046) and should also consider the implications for the safe and efficient</b></p>	<p>Racecourse South. The TII submission recommends that <i>“a more detailed and collaborative assessment and plan be prepared for this area by the planning authority which will avoid undermining of the safe and efficient operation of the national road and light rail networks and to deliver a new sustainable community, carried in accordance with Area Based Transport Assessment Guidance Notes (2018, TII publication PE-PDV-02046)”.....”</i> The Executive consider that the requirement for a more detailed study pertains to the Racecourse South lands alone.</p> <p>The NTA submission sheds some more light on the issue in that it also recommends that a more detailed and collaborative assessment of the Racecourse South lands be carried out using the ABTA methodology prior to their development.</p> <p>The Planning Authority have consulted with both the TII and the NTA who have both confirmed that the concern lay with the racecourse South lands and their impact on Junction 15 and the Luas operation and not with other lands within the vicinity of Junctions 14 and 15. In consultation the TII also advised the Planning Authority to examine the details of the oral hearing in relation to the Glenamuck District Distributor Road. While this was not raised in their submission for completeness this has also been examined and is referenced below.</p> <p>Notwithstanding the above, the OPR recommendation requires the planning authority to determine, through an evidence-based approach how the strategic traffic function of national roads will be maintained with the full extent of development proposed to be accommodated within the entire vicinity of J14 and J15 of the M50 under the Draft Plan. This is taken to include two areas that are termed “new residential communities” in the Draft Plan Core Strategy- Ballyogan and Environs (which includes Carrickmines) and Kiltiernan Glenamuck, the mixed use brownfield district of Sandyford and the new mixed use district of Cherrywood.</p> <p><b>EMRA RSES</b></p> <p>It is important to take a step back and examine the overarching settlement strategy and policy approach for the County in the context of safeguarding the strategic traffic function of national roads. The EMRA Regional Spatial and Economic Strategy (RSES) which was agreed by the Regional Assembly sets out the settlement strategy for the region. The Dublin Metropolitan Area Strategic Plan (MASP) is a vision</p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
<p><b>operation of the light rail network and other transport modes.</b></p>	<p>for the future growth of the Metropolitan area and identifies strategic corridors based on their capacity to achieve compact sustainable and sequential growth along key public transport corridors, existing and planned. The MetroLink corridor – comprising MetroLink and an enhanced Luas Green Line - identifies specific growth areas including, ‘New and emerging mixed use districts at Cherrywood and Sandyford and new residential communities at Ballyogan and Environs and Kiltiernan-Glenamuck’. Advancing the build-out of lands in the area would consequently be fully in accordance with and supported by the stated objectives of the Regional Spatial and Economic Strategy.</p> <p><b>Spatial Planning and National Roads (2012) (Section 28 Guidelines)</b></p> <p>The above named Section 28 Guidelines centre around an approach that the <i>“planning system must ensure that the strategic traffic function of national roads is maintained by limiting the extent of development that would give rise to the generation of short trip traffic on national roads or alternatively by ensuring that the trip demand from future development will primarily be catered for on the nonnational network”</i> (1.3 p3). Strategic traffic includes major inter urban and inter regional car trips.</p> <p>The Guidelines state that <i>“plans that promote compact urban development and brownfield regeneration in line with the Government’s Smarter Travel strategy will minimise the need for travel and where such need does arise, will encourage a switch towards sustainable modes such as walking, cycling and public transport.”</i></p> <p>This is the development approach being advocated in the Draft Plan. As set out in other responses the overarching policy approach of the Draft Plan which is centered on promoting the ten minute neighborhood and compact climate resilient communities where people have the options to use public transport and the softer modes for everyday trips.</p> <p>The 2012 Section 28 Guidelines recommend the use of Traffic and Transport Assessments (TTAs) at application stage. The guidelines state that TTAs are <i>“used to assess the transport impacts of a proposed development, incorporating any subsequent measures necessary to ensure roads and junctions and other transport infrastructure in the vicinity of the development remain fit for purpose and encourage a shift towards sustainable travel modes.”</i> Section 12.4.2 of the Draft Plan sets out the requirements in relation to TTAs.</p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
	<p>Where larger new developments are proposed within the vicinity of Junction 14 and 15 a TTA will, using an evidence based methodology, consider the impact of the proposed development on the existing road network which would include the M50. It is respectfully put forward that any further concerns around impact on the M50 can effectively be addressed by demand management measures which fall outside the remit of the Planning Authority but within the remit of the TII and NTA.</p> <p>Notwithstanding the above the Executive will address each area in the vicinity of junction14 and 15 of the M50 where growth is planned in the Draft Plan</p> <p><b>Cherrywood</b>                      In relation to Cherrywood, the question of how the strategic traffic function of national roads will be maintained with the full extent of development proposed to be accommodated within the Planning Scheme area was fully assessed as part of the approved Cherrywood Planning Scheme. This included a full assessment of impact on Junction 15 of the M50.</p> <p>The Planning Authority have recently submitted an amendment to the scheme to An Bord Pleanala in relation to building height. The amendment information submitted to ABP includes letters from both Transport Infrastructure Ireland and the NTA both of which raised no issue with the impact on the M50 and Junction 15. It is respectfully considered that the evidence based approach required to assess the impact of the Cherrywood area on the strategic traffic function of the M50 and junction 15 has already been carried out and that the assessment continues to remain robust as any amendments have been agreed with both NTA and TII. It should be noted that amendments to the Cherrywood scheme fall outside of the Development Plan process.</p> <p>It is respectfully concluded that in relation to Cherrywood no further evidence based approach is required to determine that the Planning Scheme will maintain the strategic function of the adjoining National Roads and Junction 15.</p> <p><b>Ballyogan and Environs (BELAP)</b></p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
	<p>Much of the BELAP area has been zoned residential since 1993. The Kilgobbin and Stepside Quarters and the Belarmine/Aikens Village lands to the west of Kilgobbin Road were rezoned from agriculture to residential in 1998, more than 21 years ago. The majority of the Stepside, Ballyogan, Carrickmines and Glencairn Quarters have been developed incrementally over the last 20-25 years or so, as have the Belarmine/Aikens Village lands west of the Kilgobbin Road.</p> <p>Over the last two decades significant state/public infrastructural funding and resources have been invested in the BELAP area to unlock the significant residential development potential of these lands, including:</p> <ul style="list-style-type: none"> <li>• The Luas Line B1 – Extension from Sandyford to Cherrywood.</li> <li>• The Ballyogan Road/Murphystown Road Improvement Schemes – from Junction 14 to Junction 15.</li> <li>• The Sandyford High Level Water Supply Scheme providing water capacity and resilience.</li> <li>• Major trunk sewer from Lambs Cross to Junction 15 to carry foul drainage to Shanganagh Waste Water Treatment Plant.</li> <li>• The South Eastern Motorway – the final piece of the M50 corridor.</li> <li>• Cycle infrastructure</li> <li>• Provision of schools</li> </ul> <p>In 2018 An Bord Pleanála granted permission for a Strategic Housing Development for 927 no. residential units on the second phase of the Clay Farm development, immediately south of the Ballyogan Road (ABP Ref. 301522). The Board Inspector’s Report on the application welcomed the principle of more development in a location served by the Luas’.</p> <p>In their assessment of the Clay Farm Application, the An Bord Pleanála Inspector stated <i>‘The location of the site on a public transport corridor within the built up area of the city means that it has relatively good access to social and commercial services and to places of employment by sustainable transport modes. Limiting residential development on the site would not reduce the demand for housing in the city, but it would displace the demand to other areas with poorer access by sustainable transport modes. The consequence of such restrictions would therefore tend to increase travel by private car and thus worsen traffic congestion... In these circumstances, it is unlikely that the further assessment sought by TII would significantly assist consideration of the current application.’</i></p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
	<p>The Racecourse South lands which are referenced in the TII and NTA submissions have many of the characteristics of the Clay Farm scheme referenced – fully serviced, immediately abutting the Luas corridor, and with reliance on Junction 15 to facilitate north south movements across that corridor. The OPR submission references the TII submission and the concerns raised in relation to the BELAP area. Much of the narrative raised in the TII submission relates to the Local Area Plan as opposed to the Draft Plan and was responded to in the Chief Executive’s Report prepared on submissions received on the Draft BELAP. The OPR also commented on the BELAP and no directions were issued following adoption of the final Plan in July 2019.</p> <p>The main concerns in the current submissions centre around the future development of the Racecourse South Lands. Section 12 of the Ballyogan and Environs Local Area Plan (2019) includes a detailed and comprehensive site development framework for these lands and stipulates that a masterplan for the site is required which must include a phasing plan. The Framework recognises that one of the challenges for the development of the area is that the site is currently served by a single vehicular access road from Junction 15 of the M50. The phasing in the Local Area Plan sets out that as part of the preparation of the Masterplan for Racecourse South the Planning Authority with the landowner/developer will enter discussions with the relevant transport agency to agree the phasing of the delivery of homes with the opening of the Luas stop. Any planning application is then required to demonstrate that the proposal accords with any agreement and would also include a TTA which would address impacts on junction 15 and the operation of the M50.</p> <p>The reality of the geographical layout of the area is that the M50 does cause significant severance in the area and junction 15 is used by local Traffic to cross the M50. The NTA submission recognises that addressing severance is critical and is supportive of the various elements of the Draft Plan and the Ballyogan Local Area Plan which will address this severance issue. The current suitability of the Luas over bridge is raised and it is considered that further engagement between the relevant agencies can address this issue.</p> <p>Coming back to the more substantive issue of the Racecourse south lands and the OPR recommendation, the TII concerns and the recommendation of the NTA, it is recommended that a site specific SLO is added requiring the preparation of an ABTA prior to the development of the lands. The addition of a Specific</p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
	<p>Local Objective is recommended as recent experience in the preparation of ABTAs (Dundrum and Old Connaught are currently ongoing) would indicate that the timeframe for their delivery would go well beyond the tight statutory time frames which relate to this stage and future stages of the County Development Plan process. As required in the recommendation this approach has been discussed with the TII and NTA and they are both in support of the proposed approach.</p> <p>It is concluded that in relation to Ballyogan and Environs which includes Carrickmines, the future ABTA will fully address the recommendations of the OPR as it will ensure maintenance of the strategic function of the adjoining National Roads and Junction 15.</p> <p>With regard to the comment that that development in the BELAP area is dependent on the use of LUAS infrastructure for which it was not designed, including permanent use of the Racecourse Luas stop and the overall issue of safe and efficient operation of the light rail network it is respectfully considered that this very specific issue could be easily overcome via consultation with relevant authorities in that there is a standard template for the design of Luas Stops and associated platform infrastructure.</p> <p><b>Kiltiernan Glenamuck.</b></p> <p>The Kiltiernan Glenamuck area has been zoned since 2004 and development in the area is tied in terms of phasing to the delivery of the Glenamuck District Road Scheme. The Glenamuck Local Area Plan, Traffic Modelling Report (2013) examined the capacity of the local transport network and identified the necessary road infrastructure, including the Glenamuck District Road Scheme, required for the sustainable development of the entire Plan lands. The road scheme was planned to allow diversion of through-traffic away from Kiltiernan Village core, to provide high quality pedestrian and cyclist infrastructure, to facilitate local public transport infrastructure and to facilitate the development of the zoned lands within the Local Area Plan by providing suitable transport infrastructure. The road scheme received full approval from An Bord Pleanála in 2020.</p> <p>The EIAR prepared in 2019 for the Glenamuck District Road Scheme carried out a full modelling exercise using the Eastern Regional Model. The modelling examined the impact of full build out of the plan lands (with the delivery of the District Road scheme) on both the M50 and junction 15 and concluded that in 2035 there would be marginal impact on the M50 and that in fact if complementary measures were</p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
	<p>included there would be an actual reduction in traffic on the M50. As part of the oral hearing TII raised queries in relation to the impact of the road on the M50 and associated junctions with full build out of the plan lands and queried whether Cherrywood SDZ and also permitted development at The Park Carrickmines had been factored into modeling. A technical note was provided by DLR and TII subsequently stated in a letter dated 5<sup>th</sup> September 2019, to the Board that TII considered that additional data provided <i>“a robust analysis of the impacts of the proposed development on the M50, strategic national road network and associated junctions in the area. It is considered that the impacts identified, subject to the mitigation proposed, are acceptable in safeguarding the strategic function of the national road network and associated junctions in the vicinity.”</i></p> <p>It is respectfully concluded that in relation to Kiltiernan Glenamuck no further evidence-based approach is required to determine that the development of the Plan lands will maintain the strategic function of the adjoining National Roads and Junction 15.</p> <p><b>SUPF</b></p> <p>Future development in the SUPF area is informed by a number of landuse and transport studies and modelling based on an increase in the residential population of 10,000 and employment growth of 350,000 square metres based on improved modal share.</p> <p>It is respectfully considered that in relation to the SUPF area no further evidence-based approach is required to determine that the development of the Plan lands will maintain the strategic function of the adjoining National Roads and Junction 15.</p> <p><b>Conclusion</b></p> <p>Development proposed in the vicinity of Junction 14 and junction 15 will be sustainable plan led compact urban development on lands identified in the MASP as strategic growth corridors, will be located in Dublin City and Suburbs, adjacent to and including the strategic employment node of Sandyford and will all be well served by existing and planned public transport.</p> <p>Aside from the issue of the development on Racecourse South lands and their impact on Junction 15 and the Luas operation, it is clearly set out above that the Planning Authority have assessed via an evidence</p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
	<p>based approach how the strategic traffic function of the M50 and Junctions 14 and 15 will be maintained with the full extent of development proposed in the Draft Plan.</p> <p>In formulating this response, the Planning Authority have consulted with both the NTA and the TII. TTAs will also continue to be used at planning application stage to assess impact of any development on existing road network which would include any National Roads and junctions.</p> <p><b>Recommendation</b>            Add a new specific local objective to Map 9 Chapter 14 of written statement as follows;  <u><i>It is an objective of the Council to carry out in consultation with TII and the NTA a collaborative Area Based Transport Assessment (ABTA) prior to the development of lands at Racecourse South. The ABTA will address how development will avoid undermining the safe and efficient operation of the National Road and light rail network and ensure that the strategic function of the M50 will be maintained with full build out of the lands. The ABTA will include assessment of impact on Junction 15 and LUAS operation and will be carried out in accordance with the TII/NTA Area Based Transport Assessment (ABTA) Advice/Guidance Notes (2018). The outcome and recommendations of the ABTA shall be taken into account in the assessment of future planning applications.</i></u>            Amend Map 9 to include new SLO</p> <p><b>SEA</b>            Whilst not raised by way of a recommendation the Chief Executive wishes to respond to the comment in the body of the OPR submission that noted that “the SEA Environmental Report attached to the Draft Plan does not consider in any detail the potential for significant effects on the M50, or other transport infrastructure constituting material assets.”</p> <p>The Executive wish to clarify that transport infrastructure is one of a number of material assets considered by the SEA, which uses Strategic Environmental Objectives (SEOs) as standards against which the provisions of the Draft Plan are evaluated in order to help identify which provisions would be likely to result in significant environmental effects and where such effects would be likely to occur, if – in the case of adverse effects – unmitigated.</p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
	<p>Given the position of the Development Plan in the land use planning hierarchy beneath the Eastern and Midland RSES, the SEOs and associated measures identified in that RSES SEA have been used – as they are or having been slightly modified – in most instances. This consistency across the hierarchy of land use plans will improve the efficiency and effectiveness of future monitoring.</p> <p>It is acknowledged that transport infrastructure is not mentioned in the SEOs under material assets. It is recommended that the SEOs under material assets be updated to incorporate “transport infrastructure”</p> <p><b>Recommendation</b>  Add to the SEOs in the Environmental Report under material assets as follows;</p> <p><i><u>Optimise existing infrastructure and provide new infrastructure to match population distribution proposals in the County – this includes transport infrastructure”</u></i></p>
<p><b>2.1.13 Climate Action</b></p>	
<p>i) In general, the Office of the Planning Regulator welcomes the Council’s approach to Climate Action. It is noted that the manner of addressing Climate Action is an evolving policy area and prudence is advised to ensure consistency with relevant climate assessment and development plan guidelines.</p> <p><b>Observation 2 – Climate Action</b></p> <p><i>“Given the importance attributed to climate action by Government, as evidenced by, inter alia, the recent Climate Action and Low Carbon Development Bill (March, 2021) and the Climate Action Plan 2019, the planning authority is advised that the Draft Plan should also include an objective to consider a variation of the development plan within a reasonable period of time, or to include such other mechanism, as may be appropriate, to ensure the development plan will be</i></p>	<p>The OPR have Observed that; given the significance given to Climate Action by Government evidenced by the Climate Action and Low Carbon Development (Amendment) Bill (March 2021) and the Climate Action Plan 2019, the Plan should allow for a variation or other mechanism to ensure consistency to the approach which will be set out in to the Revised Development Plan Guidelines or other relevant guidelines. Other submissions have also referred to the need to take this evolving approach to climate change on board. It is noted that the Revised Development Plan Guidelines referred to in Observation 2 have not been published either in draft or finalised version. In terms of the Climate Action and Low Carbon Development (Amendment) Bill (March 2021) this response is being prepared as the Bill has been cleared by the Dáil and is passing through the Seanad and it is anticipated that it will be enacted by mid-July (as this response is being prepared). It is considered appropriate to respond to the observation 2 in the context of the evolving approach to climate Action.</p> <p>Climate Action is an evolving area in terms of policy, legislation and guidelines. The Written Statement was carefully crafted in this knowledge and supports international and national objectives and legislation. This can be seen in the first paragraph on page 52 which refers to the “European Climate Law” and the implications for this in terms of Ireland’s energy, emissions and other targets set out in national policy. The last paragraph of Section 3.2.1 sets out that “new policies, legislation and measures are being developed” to reflect the GHG reductions required to accord with EU legislation.</p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
<p><b><i>consistent with the approach to climate action recommended in the revised Development Plan Guidelines as adopted or any other relevant guidelines.”</i></b></p>	<p>The wording of Policy Objective CA1 refers to International and National objectives, lists the main relevant national policy documents and finally refers to “<i>other relevant policy and legislation</i>” to broaden the scope of the policy and account for the evolving situation.</p> <p>This evolving policy area is further referred to in the paragraph following Policy Objective CA1 (on page 52) which states: “<i>Climate action is an evolving policy area and new legislation is in preparation.</i>”</p> <p>Notwithstanding this, it is noted that the Climate Action and Low Carbon Development (Amendment) Bill 2021 (anticipated to be enacted in mid July 2021) provides some significant changes in how climate action is approached including clarification on the relationship of the Local Authorities Climate Change Action Plans and Development Plans. Therefore, it is considered appropriate to update Policy Objective CA1 and accompanying text to refer to the forthcoming legislation, the new national Climate Action Plan 2021 (in preparation) and also include reference to guidelines.</p> <p>Policy Objective CA3: Measuring Green House Gas Impacts deals with the issue of revised development plan guidelines which are in preparation as set out below (text underlined for emphasis):</p> <p><b>3.2.3 Policy Objective CA3: Measuring Greenhouse Gas Impacts</b>  <i>It is a Policy Objective that spatial and infrastructure planning are consistent with climate mitigation and adaptation objectives. When it is available, the Council will be informed by the work led by the Eastern and Midland Regional Assembly to develop a methodology for quantifying the GHG impacts of spatial planning policies, (QGasSP, an ESPON EU research programme) <u>and the forthcoming Development Plan Guidelines or other national Guidance as appropriate.</u> The Council will quantify the GHG impacts for this County Development Plan when EMRA guidelines become available. (Consistent with NPO 54 of the NPF and RPO 3.6 of the RSES)</i></p> <p>It is considered appropriate to amend the wording of this policy to clarify the intentions and to provide for a variation of the development plan, if necessary, to ensure that the plan is consistent with the forthcoming Section Development Plan Guidelines and any other relevant guidelines.</p> <p><b>Recommendation</b>  <b>Amend Policy Objective CA1 (page 53) as follows;</b></p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
	<p><b><i>“Policy Objective CA1: National Climate Action Policy</i></b></p> <p><i>It is a Policy Objective to support the implementation of International and National objectives on climate change including the ‘Climate Action Plan 2019 to Tackle Climate Breakdown’, the ‘National Adaptation Framework’ 2018, the ‘National Energy and Climate Plan 2021-2030’, <u>and take account of the ‘Climate Action and Low Carbon Development (Amendment) Bill 2021’, and subsequent updates, other relevant policy, Guidelines and legislation, that support the climate action policies included in the County Development Plan.”</u></i></p> <p><i>At a national level, progress has been made in the evolution of climate change policy in Ireland. <del>The 2015 ‘Climate Action and Low Carbon Development Act’ provides the statutory basis for the approval of plans by the Government in relation to climate change for the purpose of pursuing the transition to a low carbon, climate resilient and environmentally sustainable economy.</del> Climate Action is an evolving policy area. <del>and new legislation is in preparation.</del> <u>The Climate Action and Low Carbon Development (Amendment) Bill 2021, updates the ‘Climate Action and Low Carbon Development Act, 2015’ by enshrining in law a commitment for net-zero greenhouse gas emissions by 2050, through establishing a ‘National 2050 Climate Objective’ that the State will pursue and achieve the transition to a ‘climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy’ by the end of the year 2050 and thereby promote climate justice. The Act set outs the role of the Local Authority to prepare climate action plans with both mitigation and adaptation measures. It also provides that local authorities shall, when making development plans, take account of their climate action plans and for that purpose the Planning and Development Act is amended. It also provides for carbon budgets and a sectoral emissions ceiling to apply to different sectors of the economy. The first two carbon budgets ending in 2030 shall provide for a 51 percent reduction in the total amount of greenhouse gas emissions.</u></i></p> <p><i>The Department of Communications, Climate Action and Environment (DCCAE) published Ireland’s first ‘National Adaption Framework’ (NAF) in 2018. Then in 2019, the Government published the ‘Climate Action Plan 2019 To Tackle Climate Breakdown’ with the ‘National Energy and Climate Plan 2021-2030’ published in September 2020.</i></p> <p><i>The <u>Government’s national ‘Climate Action Plan 2019 To Tackle Climate Breakdown’ is a statement of Government policies relevant to decarbonisation and adapting to a changing climate, with 183 specific actions assigned across all parts of the Government. The Plan identifies how Ireland will achieve its 2030</u></i></p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
	<p><i>targets for carbon emissions and puts Ireland on a trajectory to achieve net zero carbon emissions by 2050 and also reiterates Ireland’s commitment to the UN Sustainable Development Goals. <u>This plan is being updated to reflect the new targets and the <a href="#">Climate Action and Low Carbon Development (Amendment) Bill 2021.</a></u> “</i></p> <p>Amend Policy Objective CA3 (page 53) as follows; From</p> <p><b><i>“Policy Objective CA3: Measuring Greenhouse Gas Impacts</i></b> <i>It is a Policy Objective that spatial and infrastructure planning are consistent with climate mitigation and adaptation objective. When it is available the Council will be informed by the work led by the Eastern and Midland Regional Assembly to develop a methodology for quantifying the GHG impacts of spatial planning policies (YGasSP an ESPKN EU research programme) and the forthcoming Development Plan Guidelines or other national Guidance as appropriate. The Council will quantify the GHG impacts for this County Development Plan when EMRA guidelines become available’ (Consistent with NPO 54 of the NPF and RPO 3.6 of the RSES).”</i></p> <p>To</p> <p><b><i>“3.2.3 Policy Objective CA3: <u>Guidelines on Climate Action and Measuring Greenhouse Gas Impacts</u></i></b> <i>It is a Policy Objective that spatial and infrastructure planning are consistent with climate mitigation and adaptation objectives. When it is available, the Council will be informed by the work led by the Eastern and Midland Regional Assembly to develop a methodology for quantifying the GHG impacts of spatial planning policies, (QGasSP, an ESPON EU research programme) and the forthcoming Development Plan Guidelines or other national guidance as appropriate. The Council will quantify the GHG impacts for this County Development Plan when EMRA guidelines become available <u>and also ensure the development plan is consistent with the approach to climate action recommended in any forthcoming revised Section 28 Development Plan Guidelines or other relevant guidelines and if necessary, vary the development plan</u> “(Consistent with NPO 54 of the NPF and RPO 3.6 of the RSES).”</i></p>
<p><b>Environment, Heritage and Amenities</b></p>	
<p><b>2.1.14 Flood risk</b></p>	

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
<p>i) OPR submission notes that much of the flood risk areas are undeveloped lands which have been zoned for development for highly vulnerable and/or less vulnerable uses.</p> <p>Submission considers that the flood risk in this area will likely be exacerbated by climate change. The 2009 Section 28 Guidelines (2009), as revised by Circular PL 2/2014, provide that where a planning authority is considering (in the plan) the future development of areas at a high or moderate risk of flooding, that would generally be inappropriate under the sequential approach, the planning authority must be satisfied that it can clearly demonstrate on a solid evidence base that the zoning or designation for development will satisfy the Justification Test for the plan making stage.</p> <p><b>Recommendation 9 – Flood risk management</b>  <b>The planning authority is required to review the Strategic Flood Risk Assessment, in consultation with the OPW, to ensure consistency with the Flood Risk Planning Authorities and Flood Risk Management Guidelines (2009), as revised. The land use zoning objectives under the Draft Plan are also required to be reviewed and amended, as appropriate, having regard to the revised SFRA, and in accordance with the application of the sequential approach, and the Justification Test where appropriate, and having regard to potential climate change effects.</b></p>	<p>The Executive notes the recommendation made.</p> <p>The Planning Authority have consulted with the OPW and reviewed the SFRA. <b>Recommendations</b> with regard to the SFRA are outlined in detail in Section 3.29 of this report. There are a number of changes recommended having regard to potential climate change effects which have been explored using various scenarios and modelling. The land use zoning objectives under the Draft Plan have been reviewed as appropriate, having regard to the revised SFRA, and in accordance with the application of the sequential approach, and the Justification Test where appropriate. The Planning Authority are satisfied that the Draft SFRA as recommended to be amended in this Chief Executive’s Report is consistent with <i>“The Planning System and Flood Risk Management Guidelines”</i> (2009), as revised.</p> <p><b>Recommendation</b>  <b>See recommendations set out in section 3.29 of this report.</b></p>
<p><b>2.1.15 Environmental Reports</b></p>	

Observations, Submissions and Recommendations	Executive’s Response & Recommendation
<p>i) The SEA is considered to be comprehensive and generally consistent with the requirements of the section 28 guidelines. Submission notes that the AA process is ongoing and will inform and be concluded at adoption of the Plan</p>	<p>The Executive notes and welcomes the comments made.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p><b>2.1.16 General and Procedural Matters</b></p>	
<p>i) OPR consider that the overall format and design of the Draft Plan, including the structure and length of the written statement and the format and presentation of the individual Chapters to be appropriate, easy to follow and understand, and to be engaging.</p> <p>Consider that the accessibility of the individual Chapters in the online version also make it easier for the public to access the relevant information.</p> <p>The visual quality of the Core Strategy map and associated maps are of good quality and appropriate scale and clarity.</p> <p>The inclusion of the primary land uses for Cherrywood SDZ, in faded tones on Maps 9 and 10, is a useful and informative addition to the Draft Plan, although it is noted that the existing map does not show the final approved scheme.</p> <p>In terms of public consultation and engagement, the Office considers the level of public engagement activity undertaken in support of the Draft Plan to be an exemplar.</p>	<p>The Executive notes and welcomes the comments made.</p> <p><b>Recommendation</b> Amend maps 7, 9 and 10 to show the approved final scheme as amended along with updated OS base mapping</p>

## 2.2 Summary of the Issues Raised and Recommendation of the Eastern Midlands Regional Authority (EMRA)

Issues Raised and Recommendations	Executive's Response & Recommendation
<b>2.2 Eastern Midlands Regional Authority - <u>B0060</u></b>	
<b>2.2.1 Summary</b>	
<p>i) Subject to the observations and recommendations of their submission, EMRA considers the overall Draft Plan, including the Core Strategy, to be consistent with the RSES. It provides a robust framework for the development of an overall strategy for the proper planning and sustainable development of the County.</p>	<p>The Executive notes and welcomes the comments made.</p> <p>Under section 27 (b) of the Planning and Development Act (as amended) it is the Regional Authority who in their submission on the Draft Plan give an opinion as to whether the draft development plan and its core strategy are consistent with the regional spatial and economic strategy. The submissions, observations and report shall include recommendations as to what amendments, in the opinion of the regional assembly, are required in order to ensure that the draft development plan and its core strategy are so consistent.</p> <p>The Executive welcome the fact that EMRA have clearly stated that <i>"The Assembly considers that the overall Draft Dún Laoghaire-Rathdown County Development Plan, including its Core Strategy, are consistent with the RSES subject to the observations and recommendations of this submission, which broadly follows the Chapter headings of the draft County Development Plan and which are considered to provide a robust framework for the development of an overall strategy for the proper planning and sustainable development of the County"</i>.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>2.2.2 Chapter 1: Introduction, Vision and Context</b>	
<p>i) The Assembly welcomes the inclusion of the overall Vision for the County and the 5 Strategic County Outcomes, which were drafted having regard to the National Strategic Outcomes of the NPF, the Regional Strategic Outcomes of the RSES, and the UN Sustainable Development Goals. Considers this approach supports alignment between local, regional and national planning policy.</p>	<p>The Executive notes and welcomes the comments made.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues Raised and Recommendations	Executive’s Response & Recommendation
<b>2.2.3 Chapter 2: Core Strategy</b>	
<p>i) Welcomes the preparation of an evidence-based analysis of key population and housing trends, including an interim Housing Need Demand Assessment, land availability and infrastructure capacity assessments, and a rationale for the main considerations which have informed the Core Strategy. Considers the Core Strategy provides a robust framework in demonstrating consistency to national and regional population targets and in identifying future growth opportunities in coordination with transport and infrastructure delivery to achieve compact sustainable development.</p> <p>Population: Considers the population projections to be consistent with the NPF Roadmap, RSES Appendix B (high scenario) and NPO 68 of the NPF.</p> <p>Housing: The ‘Draft Housing Strategy and Interim HNDA’ provides a robust evidence-based framework to inform housing policies in the Draft Plan, along with requirements for social housing in accordance with Part V of the Planning and Development Act (as amended). Welcomes the inclusion of a Policy Objective to review the Interim HNDA, upon the delivery of a Regional HNDA.</p> <p>Tiered Approach to Zoning: The Residential Development Capacity Audit aligns with NPO 72a of the NPF which requires a standardised, tiered approach to identify zoned land that is serviced (Tier 1) and zoned land that is serviceable (Tier 2) within the life of the County Development Plan. Welcomes the inclusion of Appendix 1</p>	<p>The Executive notes and welcomes the comments made. It is noted that the EMRA submission in their recommendation states that the “Draft Plan will be required to demonstrate <u>general consistency</u> with the NPF Roadmap and with the ESRI NPF housing demand scenario in the Section 28 Guidelines ‘Housing Supply Target Methodology for Development Plans’” (italics and underlining added for emphasis). The use of the term “general consistency” is welcomed by the Executive and this is in line with what is stated in the Section 28 Guidelines and differs from the requirement set out in the recommendations of the OPR which stated “consistency”.</p> <p><b>Recommendation</b>  The issue raised by the EMRA regarding the housing target is addressed in the response to the OPR in Section 2.1 above.</p>

Issues Raised and Recommendations	Executive’s Response & Recommendation
<p>which sets out a detailed appraisal of strategic enabling infrastructure requirements.</p> <p><b>Housing Target: The Draft Plan will be required to demonstrate general consistency with the NPF Roadmap and with the ESRI NPF housing demand scenario in the Section 28 Guidelines ‘Housing Supply Target Methodology for Development Plans’ at Chief Executives Report and, if required, at Material Alterations stages. Recommends that the housing target for 2020-2028 in Table 2.7 be updated to take into account the housing demand for the 6 years of the County Development Plan period 2022-2028, and to set out a rationale that demonstrates consistency between the Core Strategy and the above referenced Section 28 Guidelines.</b></p> <p>Settlement Strategy: Considers the Settlement Strategy to be consistent with the RSES Settlement Strategy. It also aligns with Table 5.1 of the MASP, which identifies strategic development areas to be delivered in tandem with enabling transport and infrastructure, including lands at Woodbrook-Shanganagh, Bray - Old Connaught, Cherrywood, Sandyford, Ballyogan and Environs and Kiltiernan-Glenamuck.</p> <p>Core Strategy Table: Subject to demonstrating general consistency with relevant Section 28 Guidelines, the EMRA considers that the Core Strategy of the Draft Plan is consistent with the RSES, is informed by a robust evidence-based assessment and makes provision for an adequate supply of zoned land and housing to meet projected population growth in the County, with a focus</p>	

Issues Raised and Recommendations	Executive’s Response & Recommendation
<p>on brownfield/infill lands to achieve compact growth, in line with strategic objectives of the NPF and RSES.</p> <p>Employment Lands: Welcomes the evidence-based approach which considers both existing lands zoned for employment purposes, and the requirement for additional employment lands based on projected population and employment growth. Considers the proposed employment strategy in the Draft Plan to be consistent with the RSES.</p> <p>Implementation and Delivery: Welcomes the inclusion in the Core Strategy of a section on implementation. The EMRA also welcomes the establishment of a performance management framework to assist the Council in meeting its statutory reporting requirements.</p>	
<p><b>2.2.4 Chapter 3: Climate Action</b></p>	
<p>i) Welcomes the inclusion of a dedicated Chapter to support Climate Action and notes that the delivery of compact growth will play a key role in achieving more sustainable settlement and travel patterns in the County, reducing the need for unnecessary car trips and associated emissions.</p> <p>Welcomes the Council's adoption of the DLR Climate Change Action Plan 2019-2024.</p> <p>Acknowledges that Codema are preparing a ‘Dublin Region Energy Master Plan’ for the Dublin Local Authorities to provide an evidence base for emissions monitoring and to inform energy and transport policies, and which will support the identification of Strategic</p>	<p>The Executive notes and welcomes the positive comments made by EMRA with regard to the approach in the Draft to Climate Action.</p> <p>As noted by EMRA the delivery of compact growth plays a key role in achieving sustainable settlement and travel patterns in the County. The Draft Plan is underpinned by the 5 strategic County outcomes set out in Chapter 1, centred around the concept of the ten minute neighbourhood and the creation of compact County and the transition to a climate resilient low carbon County where all trips can be made by sustainable modes.</p> <p>The issue of mode share has been discussed in detail above in Section 2.1.11 Mode share. The Council is committed to increasing active and public transport mode share and supports national policy as set out in Smarter Travel including the mode share targets contained therein. With regards to the recommendation to set travel mode share targets, the NTA advise to include a single modal share travel target of 10% for cycling which is consistent with the National Cycle Policy Framework 2009. This is very much a minimum</p>

Issues Raised and Recommendations	Executive’s Response & Recommendation
<p>Energy Zones and District Heating opportunities in line with RPOs 7.35 and 7.38 of the RSES.</p> <p>Welcomes the inclusion of a Landscape Assessment Study and Landscape/Seascape Character Areas in Appendix 9 and a Wind Energy Strategy which can support delivery of projects within Strategic Energy Zones.</p> <p>Notes that the ‘Area of Wind Potential’ for large scale wind energy infrastructure in the County is limited and concentrated in high amenity areas, but that the Council remains supportive of offshore wind energy development and small-scale wind energy developments within urban areas. Welcome the inclusion of Appendix 14, Table 4: Implementation of SPPRs from DHPCLG (2017) Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change.</p> <p>Highlights the DHLGH Circular Letter LGSM01-2021 and the 2019 Climate Action Plan which requires Local Authorities to identify at least one Decarbonising Zone. Notes that the potential to identify decarbonising and low emission zones may be considered as part of strategic urban regeneration/ brownfields and transport orientated development and incorporate measures to support increased permeability and a shift to sustainable modes of transport.</p> <p>Welcomes the inclusion of a Policy Objective that outlines the Council’s commitment to include measures to assess and monitor progress on Greenhouse Gas emission reduction targets, following the development of a robust methodology for quantifying the GHG impacts of spatial</p>	<p>standard, as the cycle network is being designed with the capacity to accommodate a mode share which could exceed this target in due course as the County and GDA Cycle Network is further rolled out.</p> <p>As welcomed by EMRA the Council has adopted the ‘DLR Climate Change Action Plan 2019-2024’ and the implementation of this is supported in Policy Objective CA4. The Council is continuing to work with Codema outside of the development plan process on the ‘Dublin Region Energy Master Plan’.</p> <p>Decarbonising Zones are supported by the Draft Plan in Section 8.7.1.12. In response to the Department of Housing Local Government and Heritage Circular Letter LGSM01-2021 and the national ‘Climate Change Action Plan 2019’, which requires Local Authorities to identify at least one Decarbonising Zone the Council has submitted a response to the Department.</p> <p>The Executive has set out above in Section 2.1.13 Climate Action its response to the evolving policy and legislative environment regarding climate action including the Climate Action and Low Carbon Development (Amendment) Bill 2021 (anticipated to be enacted in mid July 2021). The Executive notes the ongoing QGasSP ESPON EU research programme which EMRA is participating in and looks forward to the guidance that this will provide to the Council to quantifying the GHG impacts of spatial planning policies as set out under Policy Objective CA3. The recommendation set out in Section 2.1.13 includes updates to Policy Objectives CA1 and CA3.</p> <p><b>Recommendation</b>  The issue raised by the EMRA with regard to the modal share is addressed in the response to the OPR in Section 2.1 above.</p>

Issues Raised and Recommendations	Executive’s Response & Recommendation
<p>planning policies, with reference to the QGasSP ESPON EU research programme, upcoming Section 28 Development Plan Guidelines or other national Guidance.</p> <p>Highlights the accelerated climate action measures set out in the Climate Action and Low Carbon Development (Amendment) Bill, published in October 2020, which commits Ireland to interim reductions in GHG emissions including an average 7% per annum reduction from 2021 to 2030 towards net-zero emissions by 2050.</p> <p><b>The review of the County Development Plan offers an opportunity for further integration of policies to support mode shift to sustainable mobility, and the incorporation of key targets for mode share set out in the Government’s Smarter Travel Policy.</b></p>	
<p><b>2.2.5 Chapter 4: Neighbourhood – People, Homes and Place</b></p>	
<p>i) Welcomes the inclusion of a dedicated Chapter which sets out detailed Policy Objectives to support the creation of sustainable communities, delivery of housing choice to meet a range of diverse needs and the promotion of healthy placemaking and the ‘10-minute’ settlement concept.</p> <p>Welcomes the recognition given to the key role of the Council’s Local Economic and Community Plan 2016-2021 (LECP) and future LECP, for supporting community development and driving economic development for the County, with reference also to the role of the DLR’s ‘Age Friendly Strategy’, ‘Healthy County Plan’ and Public Participation Network, in planning for social infrastructure needs and creating inclusive communities.</p>	<p>The Executive notes and welcomes the comments made and issues raised particularly those in relation to the potential of the policies of the Draft Plan to reduce the carbon footprint of the County which is in line with the Strategic County Outcomes to create a climate resilient County, the support for the new SNI land use zoning objective and its linkage to healthy placemaking and the ten minute neighbourhood concept and the support for the new Building heights Strategy.</p> <p>The comments in relation to the interim HNDA and use of same to inform Policy Objectives on housing mix are also welcomed. It should be noted that amendments are recommended to the Draft Plan to address the new guidance entitled <i>Guidance on the Preparation of a Housing Need and Demand Assessment</i> issued by the Department of Housing, Local Government and Heritage. See section 3.17, Appendix 2 for recommended changes.</p> <p><b>Recommendation</b> See section 3.17, Appendix 2 for recommended changes relating to HNDA.</p>

Issues Raised and Recommendations	Executive’s Response & Recommendation
<p>Acknowledges that access to services is central to healthy placemaking and welcomes the inclusion of specific objectives for the provision of social infrastructure including the new land use zoning objective ‘SNI’ for the provision of sustainable neighbourhood infrastructure, which will support the ‘10-minute’ neighbourhood concept.</p> <p>Considers the Draft Plan has the potential to reduce the carbon footprint of the County through its proposed Policy Objectives to restrict the spread of one-off housing into rural and green belt areas together with Policy Objectives to encourage compact growth and sustainable higher densities in proximity to high quality public transport corridors and urban centres.</p> <p>Welcomes the inclusion of a Building Height Strategy for the County (Appendix 5), which sets out area specific guidance and performance-based criteria for building height to support delivery of increased residential densities and compact growth as part of a plan led approach.</p> <p>Welcomes the preparation of a HNDA as part of the Housing Strategy during a time when the HNDA guidance at national level is yet to be confirmed. Considers that the Draft Plan is supported by a robust evidence-based methodology to inform housing policies, in accordance with NPO 37 and RPO 9.5.</p> <p>Welcomes the inclusion in Appendix 14 of a detailed statement demonstrating compliance with the policies</p>	

Issues Raised and Recommendations	Executive’s Response & Recommendation
<p>and objectives of relevant Section 28 Guidelines, including how the Draft Plan will support implementation of SPPRS’s from the DHLGH’s <i>‘Sustainable Urban Housing: Design Standards for New Apartments’</i> and <i>‘Urban Development and Building Heights’</i> in relation to the provision of build to rent and student accommodation, and a more varied mix of housing type and tenure throughout the County.</p>	
<p><b>2.2.6 Chapter 5: Sustainable Movement and Transport</b></p>	
<p>i) Welcomes the commitment to integrated transport and land use, promoting sustainable mobility, including walking and cycling and public transport, and integration of demand management and travel planning measures to facilitate sustainable travel patterns and enable modal shift.</p> <p>Welcomes the commitment to incorporate Area Based Transport Assessments in the preparation of Local Area Plans. <b>Recommends early and ongoing engagement with the transport agencies to ensure the integration of transport and land use in the Draft Plan, in addition to any upcoming local land use plans, and to incorporate mode shift targets into the planning and design of future development, with reference to the Government’s Smarter Travel Policy.</b></p> <p>Highlights Section 5.6 in the RSES ‘Key Transport Infrastructure in the Metropolitan Area’ and Table 8.2 ‘Rail Projects’ which states the intention to <i>‘Undertake appraisal, planning and design of LUAS network expansion to Bray, Finglas, Lucan and Poolbeg’</i>. Considers the delineation of the proposed Luas Line Extension on</p>	<p>The Executive notes and welcomes the comments made and issues raised.</p> <p>The Executive notes the recommendation for early and ongoing engagement with the transport agencies to ensure the integration of transport and land use in the Draft Plan and upcoming land use plans. The Planning Authority has and will continue to liaise with the transport agencies on forthcoming land use plans.</p> <p>The Executive has a number of ABTAs in preparation in conjunction with Local Area Plans, which are being developed in partnership with the NTA. This ensures that mobility requirements and access for all is incorporated into the local area plan process which enhances the potential to positively effect modal change. Part of the ABTA process as set out in the NTA/TII ‘Area Based Transport Assessment December 2018’ is to <i>“Identify measures which can significantly influence the demand for travel and mode choice”</i>.</p> <p>To strengthen the commitment to the ABTA approach, a new Policy Objective to prepare Local Transport Plans (Area Based Transport Assessments) is proposed below in Section 2.3.3. In addition, in response to concerns raised with regard to lands at Racecourse South (in the Ballyogan Environs LAP area) by the Planning Regulator NTA and TII an SLO it is proposed to prepare an ABTA in conjunction with the TII and the NTA.</p> <p>Smarter Travel Policy and modal share targets are supported by the existing Policy Objective T3 which states:</p>

Issues Raised and Recommendations	Executive’s Response & Recommendation
<p>Land Use Zoning Maps 10 and 14 may be premature to the findings of any such appraisal, and subject to the current review of the NTA Transport Strategy, and any Area Based Transport Assessment prepared as part of the future Old Connaught LAP. <b>Recommends that the proposed LUAS Line Extension in the Draft Plan should be updated to reflect the proposed LUAS Line Extension to Bray as set out in the RSES and NTA Transport Strategy for the Greater Dublin Area 2016-2035.</b></p> <p>Welcomes the progress made in improving walking and cycling infrastructure as part of the accelerated measures in response to the COVID-19 pandemic. Supports the continued roll out of public realm and active travel interventions, which should include provision for older people, people with disabilities and young children, in line with the principles of universal design and incorporate monitoring measures to inform the implementation of permanent solutions where clear benefits are identified.</p> <p>Welcomes the inclusion of a Policy Objective to improve access to and support the continued development of Dún Laoghaire Port as a marine related asset in accordance with the ‘National Ports Policy’ and consistent with RPO 8.23 of the RSES.</p>	<p><i>“It is a Policy Objective to promote, facilitate and cooperate with other transport agencies in securing the implementation of the transport strategy for the County and the wider Metropolitan Area as set out in Department of Transport’s ‘Smarter Travel, A Sustainable Transport Future 2009 –2020’ including the <b>modal share targets</b> and the NTA’s ‘Greater Dublin Area Transport Strategy 2016-2035’, the RSES and the MASP”</i></p> <p>Travel Plans are required to be prepared for developments which generate significant trip demand as set out in Policy Objective T16: Travel Plans and Section 12.4.3. As recommended in the NTA Guidance ‘Achieving Effective Workplace Travel Plans Guidance’ for Local Authorities the mode split target is assessed at development management stage against the Smarter Travel target, however, it is noted that this is not explicitly stated in Section 12.4.3 of the Draft Plan. Therefore, it is considered appropriate to amend the text to accord with Smarter Travel or any subsequent updates (as new policy is in preparation by the Department of Transport which may state higher targets).</p> <p>Section 5.6 in the RSES ‘Key Transport Infrastructure in the Metropolitan Area’ and Table 8.2 ‘Rail Projects’ states that it is intended to ‘Undertake appraisal, planning and design of LUAS network expansion to Bray, Finglas, Lucan and Poolbeg’</p> <p>The Executive notes the concerns raised by EMRA with regard to the delineation of the Luas Line Extension on Land Use Zoning Maps 10 and 14 and the recommendation that the Final Plan should be updated to reflect the RSES and NTA Transport Strategy for the Dublin Region 2016- 2035 and the EMRA RSES.</p> <p>The NTA have also raised this issue and set out in their submission noting that the alignment of the Luas extension has not been finalised in the ‘Transport Strategy for the Greater Dublin Area 2016-2035’ but noting that the depiction on Map 14 is reflective of the strategy with the exception of the spur to Fassaroe which is not currently proposed by the NTA.</p> <p>The NTA recommend that the spur to Fassaroe is either removed or <i>“if retained, should be accompanied by an explanatory note outlining the status of the proposal and committing to further consideration informed by, and in the context of, the next GDA Transport Strategy”</i></p>

Issues Raised and Recommendations	Executive’s Response & Recommendation
	<p>It is noted that the spur to Fassaroe is not listed in the infrastructure required for the Bray and Environs Transport Strategy as set out in Section 5.3.2 of the Draft. On this basis and in the absence of the requirements for the spur in the NTA’s ‘Greater Dublin Area Transport Strategy 2016-2035’ or the EMRA RSES it is considered appropriate to recommend that the spur to Fassaroe be removed.</p> <p><b>Recommendation</b>                      Insert the following in Section 12.4.3 following the final paragraph:  <i>“The travel mode share target shall at minimum meet the Smarter Travel targets (or any subsequent updated national/regional targets) - peak hour transport mode split of a maximum of 45 % trips by Car Driver and 55% minimum by sustainable modes (walking, cycling and public transport). “</i></p> <p>Remove the Fassaroe spur of the Luas extension from Map 14.</p>
<p><b>2.2.7 Chapter 6: Economic Development and Employment</b></p>	
<p>i) Welcomes the evidence-based approach taken in setting out the socio-economic and employment profile of the County, which informs the economic policies in the Draft Plan.</p> <p>Welcomes the recognition of the need for alignment between the County Development Plan and the LECP, along with the role of the LECP in facilitating local economic development.</p> <p>Considers that the location of strategic employment lands is consistent with the settlement hierarchy in the RSES and MASP.</p> <p>The Policy Objectives relating to the equine, maritime, local services, promotion of home working/e-working, rural enterprise and diversification of local enterprise to create resilience, and transition to a low carbon economy,</p>	<p>The Executive notes and welcomes the comments made and issues raised particularly the commentary which considers that the location of strategic employment lands is consistent with the settlement hierarchy in the RSES and MASP.</p> <p><b>Recommendation</b>                      No change to Draft Plan.</p>

Issues Raised and Recommendations	Executive's Response & Recommendation
<p>are supportive of the economic policies in the RSES and other government policies. Acknowledges the important role of the tourism sector and highlights the designation of Dublin Bay as a UNESCO Biosphere.</p>	
<p><b>2.2.8 Chapter 7: Towns, Villages and Retail Development</b></p>	
<p>i) Considers the retail hierarchy in the Draft Plan to be consistent with the retail hierarchy for the Region as presented in the RSES and the Retail Strategy for the Greater Dublin Area.</p> <p>Highlights the challenges facing traditional on-street retailing, which have been accelerated by the COVID-19 pandemic and welcome the efforts made by the Council to develop new and enhanced experiences and a sustainable mix of functions within commercial centres.</p> <p>Supports the continued roll out of measures to improve accessibility and permeability in the public realm, measures to support a shift towards home-working, as well as opportunities to facilitate co-working and remote-working spaces and a greater mix of daytime and night time uses in urban centres.</p>	<p>The Executive notes and welcomes the comments made. The Executive notes the EMRA have raised no issue with the retail hierarchy shown in the Draft Plan and consider that it is consistent with the Retail Strategy for the Greater Dublin Area. The support for the direction of the policy towards a sustainable mix of functions is welcomed.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p><b>2.2.9 Chapter 8: Green Infrastructure and Biodiversity</b></p>	
<p>i) Welcomes the inclusion of a dedicated Chapter on Green Infrastructure and Biodiversity, the inclusion of a Green Infrastructure Strategy in Appendix 15 and the recognition given to Green Infrastructure as a key strategic asset which can aid in the creation of a climate resilient County.</p>	<p>The Executive notes and welcomes the comments made and also likewise looks forward to continued engagement with the EMRA to facilitate the integration of the ecosystem services into policy and plan making, to improve Green Infrastructure and Ecosystem Services Mapping and support the delivery of strategic green Infrastructure.</p>

Issues Raised and Recommendations	Executive’s Response & Recommendation
<p>Welcomes the integration of an emerging Ecosystem Services Approach as part of a new Biodiversity Plan for the County and also the inclusion of the Policy Objective in the Core Strategy to promote an Ecosystem Services Approach in the preparation of lower-level plans, strategies and development management.</p> <p>Notes the intention to update the DLR ‘Green Infrastructure Strategy’ during the lifetime of the Plan, and in this regard, highlights the Green Infrastructure policies in Section 5.9 of the MASP and Table 7.1 ‘Strategic Natural, Cultural and Green Infrastructure Assets in the Region’.</p> <p>Welcomes the recognition given to the Dublin Bay Biosphere and Dublin Mountains Partnership. Highlights the recreational and tourism potential of natural assets and supports alignment with Fáilte Ireland’s key tourism brands.</p> <p>Commends the commitment of DLR to the principles of sustainable development and Green Infrastructure and looks forward to continued engagement with the Council to facilitate the integration of ecosystem services into policy and plan making, to improve Green Infrastructure and Ecosystem Services Mapping and support the delivery of strategic Green Infrastructure.</p>	<p>The recognition by EMRA that the Draft recognises the Dublin Bay Biosphere and Dublin Mountains Partnership is also welcomed along with the important tourism and recreational potential from the natural assets of the County.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p><b>2.2.10 Chapter 9: Open Space, Parks and Recreation</b></p>	
<p>i) Welcomes the recognition given to the role of open space and healthy placemaking in facilitating improvements to human wellbeing and quality of life, along with Policy</p>	<p>The Executive notes and welcomes the comments made. Policy Objective OSR8: Greenway and Blueway’s Network emphasises that DLR will work with adjoining Local Authorities and other stakeholders which would include EMRA to achieve linkages and corridors.</p>

Issues Raised and Recommendations	Executive’s Response & Recommendation
<p>Objectives to develop a comprehensive network of County Greenways linking parks and public open spaces into wider strategic networks.</p> <p>Highlights the potential to develop the network of strategic greenways detailed in the RSES including the East Coast Trail, Wicklow Way, Dublin Mountains Way and Dodder Greenway, subject to careful routing and design to ensure the protection of environmentally sensitive sites.</p> <p>Welcomes Appendix 12 ‘Public Rights of Way/Recreational Access Routes’.</p> <p>Welcomes the inclusion of Policy Objectives to support the objectives of public health policy including ‘Healthy Ireland’ and the ‘National Physical Activity Plan’ and the provision of enhanced open space, sports and recreation, including water-based sports and play facilitates across the County.</p>	<p>Recognition by EMRA of the inclusion of Policy Objectives to support public health including ‘Healthy Ireland’ and the ‘National Physical Activity Plan’ and the provision of enhanced open space, sports, play and recreation including water-based supports is also welcomed.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p><b>2.2.11 Chapter 10: Environmental Infrastructure and Flood Risk</b></p>	
<p>i) Notes that the Chapter sets out policy supports for climate action and highlights that the Planning Authority shall have regard to the provisions of the Climate Action Plan (2019), the National Mitigation Plan (2017) and the National Adaptation Framework (2018).</p> <p>With regard to the impact of climate change and increased flood risk and coastal erosion, there is a need to ensure the resilience of critical infrastructure that is capable of withstanding, adapting and recovering from</p>	<p>The Executive notes and welcomes the comments made. The Executive notes the reference to RPO 7.43 and the need to ensure the resilience of critical infrastructure that is capable of withstanding, adapting and recovering from extreme weather events, for example, coastal rail lines.</p> <p>Policy Objective EI25: Coastal Defence sets out that the Coastal Defence Strategy details specific coastal protection measures on a priority basis and undertakes a risk assessment of the vulnerability of the Study area and hinterland to both erosion and coastal flooding. During the course of the Study, areas were identified where it was considered that the risks relating to coastal defence issues were likely to be highest. Measures to be applied to these specific areas were prioritised. It should be noted however that not all of these areas are in the ownership of the Council.</p>

Issues Raised and Recommendations	Executive’s Response & Recommendation
<p>extreme weather events, for example, coastal rail lines (RPO 7.43 refers).</p> <p>Welcomes the intention to liaise with the OPW and Climate Action Regional Office on progressing a Pilot Coastal Monitoring Survey Programme, which will inform future decisions on coastal management and defence measures in the County.</p> <p>Welcomes the commitment to the provision of high-quality infrastructure to support future development. EMRA will promote enhanced co-ordination between Local Authorities and infrastructure agencies for the delivery of strategic enabling infrastructure in a plan led manner.</p>	<p>See also section 3.28 Appendix 16. Strategic Flood Risk Assessment, where detailed amendments are recommended to the SFRA due to new scenario information relating to coastal flooding due to climate change and wave overtopping. The Executive have consulate with the OPW in preparing responses and recommendations.</p> <p><b>Recommendation</b> See section 2,1 above and section 3.28 Appendix 16. Strategic Flood Risk Assessment.</p>
<p><b>2.2.12 Chapter 11: Heritage and Conservation</b></p>	
<p>i) Notes the Policy Objective to support the preparation of a new County Heritage Plan 2021 – 2025. Highlights the contents of the RSES which emphasises the benefits of heritage led urban regeneration (e.g. through the protection of historic urban fabric), the re-use of historic buildings, and the enhancement of places of cultural or natural interest, all of which can play a key role in driving tourism and economic development in terms of placemaking and enhance the vibrancy of historic town centres.</p>	<p>The Executive notes and welcomes the comments made. The Draft Plan includes several policies which would support heritage led urban regeneration including:</p> <ul style="list-style-type: none"> <li>• Policy Objective HER13: Architectural Conservation Areas</li> <li>• Policy Objective HER19: Protection of Buildings in Council Ownership</li> <li>• Policy Objective HER20: Buildings of Vernacular and Heritage Interest</li> <li>• Policy Objective HER22: Protection of Historic Street Furniture and Public Realm</li> <li>• Policy Objective HER26: Historic Demesnes and Gardens</li> <li>• The DLR Draft Heritage Plan is currently being prepared.</li> </ul> <p><b>Recommendation</b> No change to Draft Plan</p>
<p><b>2.2.13 Chapters 12 to 14</b></p>	

Issues Raised and Recommendations	Executive's Response & Recommendation
<p>i) Considers the development management standards, land use zoning objectives and local objectives set out in Chapter's 12 to 14 provide a comprehensive framework for the assessment of planning applications in the County.</p>	<p>The Executive notes and welcomes the comments made.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p><b>2.2.14 Chapter 15: Implementation, Monitoring and Evaluation</b></p>	
<p>i) Welcomes the inclusion of a dedicated Chapter on implementation, monitoring and evaluation and the recognition given to monitoring the delivery of the Core Strategy.</p> <p>Commends the Council for the inclusion of monitoring mechanisms to be put in place to ensure effective delivery of the County Development Plan and for greater transparency on the progress made in its implementation.</p> <p>Notes that the Regional Assembly are developing a Regional Development Monitor, which is aligned to National and Regional Strategic Outcomes in the NPF and RSES, and that this may provide additional guidance in monitoring the delivery of Development Plans.</p>	<p>The Executive notes and welcomes the comments made.</p> <p>The Executive would be supportive of any additional monitoring mechanisms developed by the EMRA which may assist the Planning Authority in monitoring the implementation of the County Development Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p><b>2.2.15 Strategic Environmental Assessment (SEA) / Appropriate Assessment (AA)</b></p>	
<p>i) Welcomes the preparation of the Draft Plan in tandem with the required environmental processes - SEA and AA.</p> <p>Highlights the EPA's 'Guidance on SEA Statements and Monitoring' (Second Review of SEA Effectiveness in Ireland), published in 2020, which provides best practice on devising monitoring measures, suitably detailed indicators and the frequency of monitoring and reporting. Notes that this guidance will inform the iterative SEA</p>	<p>The Executive notes and welcomes the comments made. The SEA statement will be prepared in accordance with the EPA Guidance.</p> <p>As set out in Section 10.2 of the SEA Environmental Report (page 152):  <i>"Given the position of the Development Plan in the land use planning hierarchy beneath the Eastern and Midland Regional Spatial and Economic Strategy (RSES), the measures identified in that RSES SEA have been used – as they are, or having been slightly modified – in most instances. This consistency across the hierarchy of land use plans will improve the efficiency and effectiveness of future monitoring programmes."</i></p>

Issues Raised and Recommendations	Executive’s Response & Recommendation
<p>process and preparation of the monitoring programme as part of the County Plan’s SEA statement.</p>	<p>It is considered that this will promote consistency in the monitoring across the hierarchy of land use plans.</p> <p>See section 3.15 of this report for details of recommendations in relation to the implementation and Monitoring of the Plan including a new Policy Objective in relation to SEA monitoring as required under Article 10 of the SEA Directive as follows;</p> <p><i>It is a Policy Objective to monitor the significant environmental effects of the implementation of the County Development Plan through the monitoring measures and reporting requirements set out in Section 10 of the SEA Environmental Report for the County Development Plan.’</i></p> <p><b>Recommendation</b> See section 3.15.</p>

## 2.3 Summary of the Issues Raised and Recommendation of the National Transport Authority

Issues Raised and Recommendations	Executive’s Recommendation
<p><b>National Transport Authority - <u>B1115</u></b></p>	
<p><b>2.3.1 Overview</b></p>	
<p>i) The Core Strategy sets out population projections which align with the population targets set by the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES), i.e. the 2031 High scenario incorporating an additional 25% ‘headroom’ provided for in the Implementation Roadmap up to 2026, and the 3,500 relocated growth as provided for under National Policy Objective (NPO) 68 of the NPF. These also align with the figures given by DLR to the recently commenced review and update of the Transport Strategy for the GDA by the NTA.</p> <p>The NTA support the key objectives of the Draft namely, compact growth, higher residential densities, the provision of residential development and employment growth on brownfield/infill sites along public transport corridors, the 10-minute settlement approach, and the promotion of multi-functional urban settlements that reduce the need to travel as they reflect the Principles of Land Use and Transport Integration set out in the current NTA strategy for the GDA.</p>	<p>The Executive notes the support of the NTA to the key objective of the Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p><b>2.3.2 Local Transport Plans</b></p>	
<p>i) Submission supports proposals to carry out LAPs during the lifetime of the Plan and Policy Objective CS10 in terms of prioritising areas in accordance with the Core Strategy.</p>	<p>The Executive notes the issue raised. The requirement for Local Transport Plans is set out in the NTA and TII Guidance Note on Area Based Transport Assessments, 2018. The Planning Authority supports the use of</p>

Issues Raised and Recommendations	Executive’s Recommendation
<p><b>While the intention to prepare Local Transport Plans (LTP) for Local Area Plans (LAPs) is noted in the Written Statement, the NTA submission recommends that a specific objective is included that Local Transport Plans are prepared for all LAP areas in tandem with LAP preparation. In the case of the racecourse south land they recommend a more detailed ABTA for the key strategic land bank within the adopted BELAP LAP Racecourse South lands. The methodology should be as per the NTA/TII guidance on Area Based Transport Assessment (ABTA) 2019.</b></p> <p><b>The NTA recommends that a LTPs should be prepared for all towns for which an LAP is proposed and for key strategic Landbanks within adopted LAPs such as the Racecourse South lands using the ABTA methodology prior to their development.</b></p>	<p>Area Based Transport Assessments (ABTAs) in the supporting Text to <i>Policy Objective T1 Integration of Land Use and Transport Policies</i> which states:  <i>“The Council will support the use of Area Based Transport Assessments (ABTAs) which integrate national and regional transport polies and objectives into local level land use plans and significant development areas in the preparation of Local Area Plans in the County.”</i></p> <p>RPO 8.6 of the RSES requires the preparation of Local Transport Plans for selected settlements in the Region. In order to strengthen the commitment to the preparation of Local Transport Plans a new Policy Objective is proposed.</p> <p>To address concerns of the NTA, TII and the OPR, a new Specific Local Objective (SLO) is also proposed to be added to Map 9 which refers to the preparation of an ABTA for the Racecourse South Lands within the adopted BELAP LAP (See response to <b>Recommendation</b> No 8 of the OPR set out above).</p> <p><b>Recommendation</b>  It is recommended to add the following Policy Objective to Chapter 5 (page 101)</p> <p><i>“Policy Objective T2: <u>Local Transport Plans (Area Based Transport Assessments)</u> It is a Policy Objective to prepare Local Transport Plans (Area Based Transport Assessments (ABTAs)) in tandem with the preparation of Local Area Plans (LAPs) and also prepare ABTAs for key strategic land banks within adopted LAPs, if required, subject to the availability of funding and in accordance with the NTA and TII Guidance Note on Area Based Transport Assessments 2018 or any subsequent updates thereof (Consistent with RPO 8.6).”</i></p> <p>Renumber Policy Objectives T2-T32</p> <p>See response to <b>Recommendation</b> No 8 of the OPR, set out above in Section 2.1 which refers to a new Specific Local Objective (SLO) to be added to Map 9 which refers to the preparation of an ABTA for the Racecourse South Lands.</p>
<p><b>2.3.3 Luas Expansion</b></p>	

Issues Raised and Recommendations	Executive’s Recommendation
<p>i) Submission notes that the alignment of the Luas Extension to Bray has not been finalised, however, the indicative alignment contained in the Transport Strategy is reflected in the Draft on Map 14. The inclusion on Map 14 of a Luas spur that branches at Old Connaught to serve Fassaroe, is not included in the Strategy for the GDA nor currently proposed by the NTA.</p> <p><b>Recommends that the proposed Luas spur to Fassaroe should be removed from the final Plan or, if retained, should be accompanied by an explanatory note outlining the status of the proposal and committing to further consideration informed by, and in the context of, the next GDA Transport Strategy.</b></p>	<p>The Executive notes the concerns of the NTA regarding a spur to Fassaroe from the propose Luas extension to Bray. The NTA states that while the alignment of the Luas extension is indicative, the spur to Fassaroe is not included in the Transport Strategy for the GDA. This has been considered above in Section 2.2.6.</p> <p>The Executive agrees with the NTAs recommendation to remove the proposed Luas Spur to Fassaroe on Map 14.</p> <p><b>Recommendation</b> Remove the Fassaroe spur of the Luas extension from Map 14.</p>
<p><b>2.3.4 Bray and Environs Roads Proposals</b></p>	
<p>i) Submission considers that the inclusion of “a new link road from Ferndale Road to Dublin Road [and] M50 Cherrywood Interchange to Rathmichael Link Road” in Section 5.3.2 for Rathmichael and Old Connaught should be dependent on an assessment as set out in the <i>Spatial Planning and National Roads Guidelines for Planning Authorities</i>, and in accordance with Section 5.8.3 Principles of Road Development of the Transport Strategy and the text in Bray and Environs Transport Study, in which the schemes were initially outlined.</p> <p><b>Recommend that Section 5.3.2 of the Draft Plan should be revised to reflect appropriately the current status of these roads and the statutory procedures for their assessment in due course.</b></p>	<p>The Executive agrees with the issue raised and notes that the TII have also raised this issue.</p> <p><b>Recommendation</b> Amend Section 5.3.2 of the Plan as follows by adding the following Text to Section 5.3.2 after the text “Rathmichael Link Road.” in the right-hand column on page 102:</p> <p><i><u>“The inclusion of the preceding three proposals is dependent on further assessment as set out in; the ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ in particular Section 2.7 and Section 5.8.3 Principles of Road Development, feasibility and environmental assessment of the NTA Transport Strategy for the GDA; and demonstration of their compatibility of with the strategic function of the national road network as set out in Sections 2.2 in the Bray and Environs Transport Study (2019).”</u></i></p>

Issues Raised and Recommendations	Executive’s Recommendation
<b>2.3.5 Roads Severance</b>	
<p>i) Submission considers that addressing the severance effect of the two major road corridors in the County, i.e. the M50 and the M11/N11, will be critical in enabling sustainable transport use and reducing reliance on the private car.</p> <p>Submission supports SLO 104, 107, 108 and 112 in this regard to address severance. The SLOs outlined in the Ballyogan and Environs LAP are similar to these and supported in principle, but there are some concerns relating to the suitability of the LUAS overbridge at Junction 15 to accommodate pedestrian and cycle movement. The NTA looks forward to further engagement to address this with the Council and the TII.</p>	<p>The Executive notes the support of the NTA to SLO 104,107, 108 and 112 which address the important issue of severance. The concern regarding the M50 Luas over bridge is noted and the Planning Authority will address this issue through engagement with the NTA and TII in the ABTA process for the Racecourse South Lands.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>2.3.6 Park and Ride</b>	
<p>i) Submission states that a Park and Ride strategy is currently being prepared for the GDA and it is likely to include sites in the DLR area. In advance of this the NTA will consider temporary or short term park and ride facilities, including bus based park and ride which would complement public transport on key transport corridors such as the N11 subject to compliance with the principles of the strategy and agreement with the NTA.</p> <p><b>Recommend the inclusion of a Policy Objective to liaise with the Park and Ride office regarding the development of short and long term park and ride sites.</b></p>	<p>The Executive notes the issue raised. It is considered that <i>Policy Objective T20: Park and Ride</i> can be expanded to address the issue raised.</p> <p><b>Recommendation</b> Amend Policy Objective T20 as follows (page 110) and add supporting paragraph below the Policy Objective and above the existing paragraphs as follows:</p> <p>5.6.6 Policy Objective T20: Park and Ride <i>“It is a Policy Objective to liaise with the Park and Ride Office of the NTA to facilitate the provision of Park and Ride facilities, both short term and long term and to provide suitable electric charging structures and adequate cycle parking, in appropriate locations along strategic transport corridors, including Woodbrook and Carrickmines and other suitable sites to be identified with the NTA Park and Ride Office, subject to the outcome of environmental assessment and planning approval. (Consistent with RPO 8.14 of the RSES)</i></p>

Issues Raised and Recommendations	Executive’s Recommendation
	<p><i>A Park and Ride Office was established by the NTA in 2020 to co-ordinate the delivery of park and ride facilities and a Park and Ride Strategy is in preparation for the Greater Dublin Area. It is anticipated that this will include sites in the Dún Laoghaire-Rathdown Area. The NTA have indicated that they will consider temporary shorter- term park and ride facilities including bus-based park and ride which could complement public transport on key transport corridors such as the N11 subject to compliance with the principles set out in the Park and Ride Strategy.</i></p>
<p><b>2.3.7 Revisions to NTA Cycling documents</b></p>	
<p>i) The NTA is currently reviewing and updating the Cycle Network Plan, in collaboration with the local authorities in the GDA, and the Cycle Manual to be concluded in 2021 and the documents, when complete, will provide a robust basis for the implementation of cycle routes in the GDA.</p> <p><b>Recommend that references in the Draft Plan to the GDA Cycle Network Plan and the National Cycle Manual should be expanded to include these updated versions.</b></p>	<p>The Executive agrees with the issue raised.</p> <p><b>Recommendation</b></p> <p>Reference to the GDA Cycle Network Plan and the Cycle Manual throughout the Plan shall be expanded to refer to updated versions as follows:</p> <p><i>5.5.3 Policy Objective T12: County Cycle Network</i>  <i>It is a Policy Objective to secure improvements to the County Cycle Network in accordance with the Dún Laoghaire-Rathdown Cycle Network Review whilst supporting the NTA on the development and implementation of the Greater Dublin Area Cycle Network Plan 2013 and subsequent revisions, subject to environmental assessment. (Consistent with RPO 5.2, 5.3 of the RSES).</i></p> <p><i>...All new development, and changes of use, must demonstrate how they can provide improved linkages to-and-from the County Cycle Network. New cycle tracks or cycle lanes, or upgrades to cycle routes, shall be designed in accordance with the ‘National Cycle Manual’ (2011) and subsequent revisions. Recreational car-free cycle routes, cycle routes to schools and Greenways will also be developed - in accordance with the Green Infrastructure Strategy (refer to Appendix 15) - to promote cycling within the County and such routes will be encouraged as part of larger developments.</i></p>



## **Part 3: Executive's Response to the Issues raised in the submissions and observations by Other Persons**



### 3.1: Chapter 1 - Introduction Vision and Context

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<b>3.1.1: Introduction and Development Plan Visions</b>			
i) Request that the existing Development Plan Vision is replaced with the following: <ul style="list-style-type: none"> <li>• <i>The Vision for Dún Laoghaire-Rathdown is to embrace arts and culture and the unique coastal location of Dún Laoghaire Harbour as a signifier of regeneration amenity and artistic expression and identity for the County. The development plan will ensure inclusiveness fairness transparency and public participation in all aspects of policy and implementation.</i></li> <li>• <i>Central to this vision is healthy placemaking, encouraging a resilient creative economy and delivering the development plan objectives in a manner that enhances our environment for future generations.</i></li> </ul>	<b>B0876</b>	3	<p>The Executive notes the issue raised.</p> <p>The vision of the Draft Plan is “<i>to embrace inclusiveness, champion quality of life through healthy placemaking, grow and attract a diverse innovative economy and deliver this in a manner that enhances our environment for future generations</i>”. This vision is deliberately strategic, concise and high level. The Executive would not recommend altering the vision to mention a very specific location in the County and whilst the Draft Plan is fully supportive of the arts sector and the important role of culture it is not consider appropriate that the vision for a statutory spatial land use plan would lead with arts and culture.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
ii) Considers that there is a reluctance to formulate a new vision for the County and that the post Covid era provides an opportunity to provide a strong urban design Plan at a much more granular level than zoning.	<b>B1191</b>		<p>The Executive consider that the Draft Plan sets out a new and exciting strategic vision that is underpinned by five strategic County outcomes that permeate throughout all sections and Policy Objectives of the Plan. The vision is focused on the concept of delivery of sustainable communities and the idea of the ten minute neighbourhood where people can access their daily needs such as schools, employment, services and leisure within a ten minute journey time of their home - by walking, cycling or using public transport. The Draft Plan also introduces a new zoning objective – Sustainable Neighbourhood Infrastructure - which aims to serve the important wealth of existing facilities and services. The more granular level that this submission refers to is usually set out in a Local Are Plan for a particular area and may include site framework strategies with urban design parameters.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
iii) Submission from the PPN welcomes the Draft Plan as a worthwhile initiative for the County.	<u>B1075</u>		<p>The positive commentary from the PPN is welcomed.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
iv) The Draft Plan fails to comply with, have regard to or take into account the following: <ul style="list-style-type: none"> <li>● Planning &amp; Development Acts.</li> <li>● Plans in adjoining counties (including Draft).</li> <li>● DoECLG Guidelines.</li> <li>● Heritage Act 1995.</li> <li>● National Heritage Plan.</li> <li>● Eastern and Midland RSES.</li> <li>● Development Plan Guidelines.</li> </ul>	<u>B0594</u>		<p>The Executive notes the issues raised and disagrees with elements raised. The Executive are surprised with some of the assertions made in the submission which it is considered do not reasonably follow from any comprehensive and thorough examination of the Draft Plan.</p> <p>With regard to the Planning and Development Act, the Act clearly underpins both the process that has been followed to date in the review and preparation of the Draft Plan and the content contained therein.</p> <p>The Plans of adjoining and indeed other non-adjoining Counties have been taken into account when preparing this Draft Plan.</p> <p>The 1995 Heritage Act is referenced in the introductory section of Chapter 11. The 2002 National Heritage Plan is not referenced in the Plan. The purpose of the said Plan was to set out a clear and coherent strategy and framework for the protection and enhancement of heritage over the five-year period from 2002 to 2007. The relevant actions of that National Heritage Plan including establishment of a heritage forum, appointment of a local authority heritage officer, preparation of successive heritage plans have taken place in DLR. A new National Heritage Plan - Heritage Ireland 2030 – is currently being prepared and is due imminently. It will set out a framework of values, principles, strategic priorities and actions to guide and inform the heritage sector over the next decade.</p> <p>With regard to the RSES, Chapter 1 of the Draft Plan sets out a number of Policy Objectives to ensure compliance with the NPF, RSES and MASP. Policy Objectives throughout the Draft Plan are referenced back to NPOs contained in the NPF and RPOs contained in the RSES. The introductory sections in many Chapters then go on to reference the relevant RSES policy. It is noted that it is the Eastern and Midlands Regional Authority who are body tasked with the statutory requirement under section 27 (b) to state whether, the draft development plan, and, in particular, its core strategy, are consistent with the regional spatial and economic strategy in force for the area of the development plan. They have made very few recommendations with regard to amendments that are required to be made to ensure full consistency of the Draft Plan</p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
			<p>with the RSES. They consider that subject to the observations and recommendations of their submission, the overall Draft Plan, including the Core Strategy, to be consistent with the RSES. They consider that the Draft Plan “provides a robust framework for the development of an overall strategy for the proper planning and sustainable development of the County”.</p> <p>Appendix 14 sets out how the Planning Authority have implemented the relevant policies and objectives of the Minister contained in all relevant Section 28 Guidelines and compliance with SPPRs contained therein. This includes the 2007 Development Plan Guidelines. It is noted that the OPR which is the body with the statutory task of evaluation and assessment of development plans in their submission commends the Council for “the inclusion of a comprehensive statement of compliance with section 28 guidelines to inform the Draft Plan”.</p> <p>The contention in the submission that the Draft Plan fails to comply with, have regard to or take into account Departmental Guidelines is not accepted.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>v) Requests that the Plan addresses the recent pandemic and changing lifestyle trends, notably people moving to more suburban locations, and the need for more open space. Propose that a statement re: post pandemic thinking should be added to Table 1.4 Creation of a Climate Resilient County.</p>	<p><b><u>B0271</u></b> <b><u>B1120</u></b> <b><u>B1145</u></b></p>		<p>The Executives notes the issues raised and recognises that over the last 16 months the County has experienced many changes due to the pandemic. The full lasting impact of the Pandemic on demographic and spatial trends has not yet been fully determined and the planning authority consider that Census 2022 and other studies will provide a very good insight into how things have changed since 2016. It is considered that those changes may go beyond the Strategic County Objective relating to Climate Resilience. The introduction of the 10-minute neighbourhood, the focus on active travel and the new SNI zoning all support enhancement of life in the County which it is acknowledged, is predominantly suburban.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>vi) Submission supports the Council’s vision in relation to the policy on sustainable communities, active aging, affordable housing, economy, and the protection of heritage within the built environment.</p>	<p><b><u>B1126</u></b></p>		<p>The Executive notes and welcomes the comments made.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>vii) Submission commends the Draft Plan. From the strategic goals to the local objectives, it is a well-</p>	<p><b><u>B0221</u></b></p>		<p>The Executive notes and welcomes the comments made.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
considered and well-made Plan. It builds on the solid achievements of its predecessor and is a credit to those who prepared it and the public representatives who ratified it.			<p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.1.2: National Planning Policy Context</b>			
<p>i) Request consistency with the vision and objectives in the National Planning Framework and the Dublin Metropolitan Area Strategic Plan.</p>	<b>B1047</b>		<p>The Draft Plan is fully consistent with both the NPF and the RSES.</p> <p>Policy Objective NPF1 of the Draft Plan, National Planning Framework states that <i>"It is a Policy Objective of the Council to ensure consistency with and support the achievement of the National Strategic Outcomes and National Policy Objectives of the National Planning Framework."</i></p> <p>Where Policy Objectives in the Draft Plan support the achievement of a specific NSO or National Policy Objective (NPO), the relevant objective is referenced in brackets after the Policy Objective statement.</p> <p>In terms of the RSES, Policy Objective RSES1- Regional Spatial and Economic Strategy states that <i>"It is a Policy Objective of the Council to ensure consistency with and support the achievement of the Regional Spatial Objectives (RSOs) and Regional Policy Objectives (RPOs) of the Regional Spatial and Economic Strategy"</i>.</p> <p>Where Policy Objectives in the Draft Plan support the achievement of a specific RSO or RPO, the relevant objective is referenced in brackets after the Policy Objective statement.</p> <p>Policy Objective MASP1- Dublin Metropolitan Area Strategic Plan states that <i>"It is a Policy Objective of the Council to support the delivery of the Dublin Metropolitan Area Strategic Plan"</i></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.1.3: UN Sustainable Development Goals</b>			
<p>i) UN Sustainable Development Goals (UNSD):</p> <p>Ensure the UNSD are at the heart of the County Development Plan in order to acknowledge and appropriately respond to Dáil Éireann's declared National Emergency on Climate Change &amp; Biodiversity Loss and the Climate Action and Low Carbon Development (Amendment) Bill 2020.</p>	<b>B0929</b> <b>B1155</b>		<p>The Executive agrees with the issue raised. A number of the UNSD goals have influenced the 5 Strategic County Outcomes. The Draft Plan contains a new Policy objective UN1 – United Nations Sustainability Goals where it is set out that <i>"is a Policy Objective of the Council to contribute, as practicable, via this Plan, towards achievement of the 17 Sustainable Development Goals of the United Nations' 2030 Agenda for Sustainable Development"</i>.</p> <p>The Draft Plan is also consistent with objectives of the NPF and RSES and there is significant alignment between the NPF's National Strategic Objectives and the United Nations Sustainable</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
Comply with the UN's Sustainable Development Goals.			<p>Development Goals. Where Policy Objectives in the Draft Plan support the achievement of a specific NSO or National Policy Objective (NPO), the relevant objective is referenced in brackets after the Policy Objective statement.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.1.4: Strategic County Outcomes (SCOs)</b>			
i) Welcome the Development Plan Vision, the inter-related Strategic County Outcomes and the recognition of the intrinsic links between climate resilience, planning policy, mental and physical health, green space, and community infrastructure. Implementation of the Plan, especially in relation to Development Management, must be measured robustly against these outcomes.	<b><u>B0271</u></b>		<p>The Executive notes and welcomes the issues raised and the positive support for the Strategic County Outcomes. The Executive would share the views in relation to implementation and monitoring and consider that Chapter 15 puts in place a robust monitoring framework.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
ii) Strategic County Outcomes include mention of “softer modes of walking and cycling” in the target of “a Compact and Connected County” and “...approach centred on the core principle of sustainability...” however the evidence of planning for the changes needed to support this vision in the Plan are not seen.	<b><u>B0749</u></b>		<p>The Executive notes the issues raised but considers that the Plan sets out a comprehensive suite of policies to address a modal shift from private car to the softer modes. In addition, compact plan led growth as set out in the plan integrates land use and transport policy ensuring that higher densities are located adjacent to public transport services thus making best use of land.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
iii) Table 1.4 – Five Strategic County Outcomes (Chapter 1, page 17) - Request that a sixth strategic outcome is included as follows:  The integration of Dún Laoghaire Harbour and Town Centre by a bold and imaginative plan and investment strategy for the arts and water-based recreation and amenity sustaining a creative hub for Dún Laoghaire is an overarching strategic outcome.	<b><u>B0876</u></b>	3	<p>The five strategic County Outcomes are high level and do not focus on individual locations in the County but rather pertain to the entire jurisdiction of the County. It is not recommended that a 6th Strategic County Outcomes specific to the Harbour and town in Dún Laoghaire is added.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
iv) Support for the Strategic County Outcomes set out in Fig 1.4.	<b><u>B0942</u></b> <b><u>B0967</u></b>		<p>The Executive welcomes the support for the Strategic County Outcomes.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
			No change to Draft Plan.
v) Welcomes the publication of the Plan and in particular the strategic objectives relating to climate change and improving liveability.	<b><u>B0024</u></b>		The Executive welcomes the support for the Strategic County Outcomes.  <b>Recommendation</b> No change to Draft Plan.
vi) Submission considers that there is a positive alignment between the Strategic County Outcomes and the LDA’s remit to deliver housing and compact growth.	<b><u>B1043</u></b>		The Executive welcomes the commentary from the LDA in relation to the alignment of the 5 strategic County outcomes with the work of the Agency.  <b>Recommendation</b> No change to Draft Plan.

### 3.2: Chapter 2 - Core Strategy

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<b>3.2.1: Devising the Core Strategy</b>			
<p>i) There will be a serious under provision of zoned land within the Eastern and Midlands Region as a consequence of the continued relative concentration of national population growth in the Region (85%), compared to the 50% growth allocation provided for under Policy Objective NPO 1a of the NPF.</p>	<b><u>B0815</u></b>		<p>The Executive notes the issue raised.</p> <p>The National Planning Framework is unapologetic in seeking to disrupt long established growth trends and move away from the current 'business as usual' pattern of development which has seen the greatest growth taking place in the Eastern and Midland Region. The aim of the NPF is to achieve a 'regional parity' approach whereby the targeted growth of the Northern and Western and Southern Regional Assembly areas combined would exceed that projected under a 'business as usual' scenario and would at least equate to that projected for the Eastern and Midland Region.</p> <p>The implementation of this approach requires a realignment of land use policies at the local level through the preparation of new, or variation to existing, City and County Development Plans. Most Local Authorities are only now at the stage of reviewing and preparing new Development Plans, and as such, current growth trends do not reflect the spatial pattern of growth envisaged through the NPF and RSES. The Core Strategy of the Draft Plan was prepared to align with the new national and regional planning policy framework - both the NPF and the RSES.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.2.2: Population Projections for the Core Strategy</b>			
<p>i) Submissions contend the Core Strategy underestimates housing need on the basis of the population projections applied, and that this results in a shortfall of land zoned for residential development. Suggests that a re-assessment of the population figures included in the Draft Plan would support the zoning of additional lands for residential development. The main issues raised are summarised as follows:</p>	<p><b><u>B0787</u></b> <b><u>B0843</u></b> <b><u>B0891</u></b> <b><u>B0928</u></b> <b><u>B0939</u></b> <b><u>B1010</u></b> <b><u>B1057</u></b></p>		<p>The Executive notes the issues raised.</p> <p>The Core Strategy of the Draft Plan is prepared to sit firmly within the broader parameters for growth set out at a national and regional level. Under Section 10(2A) of the Planning and Development Act, 2000, (as amended) there is a statutory requirement for the Core Strategy to demonstrate consistency with these higher level plans. With respect to Core Strategies, the RSES specifically states that:</p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
<ul style="list-style-type: none"> <li>• The population figures in the Draft Plan require updating to take account of the latest population growth figures published by the CSO.</li> <li>• The up to date CSO figures indicate a significantly higher level of inward migration, and higher overall population growth than anticipated in the NPF.</li> <li>• Actual population growth over recent years has been more than double that factored for.</li> <li>• The application of the 25% population headroom allowance, as provided for in the NPF Roadmap, should be applied to 2028 to take account of the anticipated continuation of population growth above the national average in DLR.</li> </ul>			<p><i>‘The core strategies of the relevant local authorities should demonstrate consistency with the population targets expressed in the NPF and the Implementation Roadmap for the National Planning Framework July 2018.’ (RSES, p. 113)</i></p> <p>The adoption of the NPF and the RSES now means that there are statutory national and regional growth strategies which include detailed population targets. The NPF prescribes population growth targets for each Region and City and the RSES sets out, in turn, the future population target for each County and City. Section 2.3.2 of the Draft Plan sets out, in a comprehensive and transparent manner, how the population projection for the Core Strategy was calculated. The calculation comprised a three-stage process based upon the relevant national and regional provisions and included: assessment of the RSES County population targets; application of additional ‘headroom’ as prescribed in the ‘Implementation Roadmap for the National Planning Framework’ (2018); and, incorporation of ‘relocated growth’ as provided for under NPO 68 of the NPF. As per the relevant statutory requirements and policy provisions, the intention and approach endorsed in the Draft Plan is to reflect a re-aligned spatial pattern of growth provided for at the national and regional level.</p> <p>The Executive acknowledges that a key factor in any population projection relates to assumptions made with respect to migration. Historically, migration levels have varied as a result of alternating periods of emigration or immigration, influenced by underlying economic conditions. It is a factor that is difficult to project and subject to fluctuation. There is considerable uncertainty with regard to recent migration levels and it is considered that the results of Census 2022 will provide a clearer picture in terms of national population growth and migration. Notwithstanding, it is highlighted that the NPF made specific provision for the possibility of higher net in-migration over the period to 2040 which was subsumed into the population figures included in the Draft Plan:</p> <p><i>‘To account for the possibility of higher net in migration over the period to 2040, an allowance is made in the NPF to enable ambition and flexibility in planning for future growth. This means that full achievement of the targets set out in this Framework would accommodate around 1.1 million additional people in Ireland to 2040, which is approximately 25% more than the ESRI baseline projection.’ (NPF, p. 25)</i></p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
			<p>The Executive does not agree that the application of the 25% population headroom allowance, as provided for in the NPF Roadmap, should be applied to 2028. The NPF Roadmap recognises that there are parts of the Country where population growth is projected to be at or above the national average baseline for growth, and in such instances, provision for headroom not exceeding 25%, may be considered up to 2026. DLR is specifically identified in the list of Counties where this additional headroom applies. Section 2.3.2.1 (ii) of the Draft Plan details how this additional ‘headroom’ has been factored into the population allocation for the Core Strategy.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Requests the additional 25% population ‘headroom’ provided for in the NPF Implementation Roadmap is taken into account.</p>	<p><b><u>B1045</u></b> <b><u>B1120</u></b> <b><u>B1145</u></b></p>		<p>The Executive notes the issue raised.</p> <p>The population projections for the Core Strategy factor in an additional 25% population headroom allowance up to 2026 in accordance with the provisions of the NPF Roadmap - see Section 2.3.2.1 (ii) of the Draft Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p><b>3.2.2: Planning and Construction Activity</b></p>			
<p>i) Highlights the lack of development on zoned land during the last six years. Submits that if the lands zoned for residential development were not developed during the last six years then it is equally unlikely that they would be developed during the next six years. Suggests this will result in under provision of housing units, notwithstanding the zoning of lands.</p>	<p><b><u>B0815</u></b></p>		<p>The Executive notes the issue raised.</p> <p>While the role of planning is a fundamental component of a healthily functioning housing market, the under-supply of housing in recent years is considered a national issue and not solely a local issue. There may be a wide range of reasons why lands zoned for residential development were not developed during the lifetime of the 2016 County Development Plan and it is considered overly simplistic to assume that these same lands would equally not be developed during the lifetime of the new Plan. The significant increase in planning activity in DLR since 2018 (see Figure 2.5) illustrates a high level of progression, in planning terms, with respect to existing residential zoned land in the County.</p> <p>Notwithstanding, it is acknowledged that the implementation of a planning permission and the delivery of units remains largely dependent on the market. In order to increase the Local Authority’s role in supporting the delivery of housing, the Draft Plan introduces an active land</p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
			<p>management strategy to activate and support the delivery of the Core Strategy. One such mechanism available to the Local Authority is the vacant site levy which seeks to incentivise the development of vacant and under-utilised sites in urban areas for housing and regeneration purposes (see Section 2.6.2.2 and Policy Objective CS15).</p> <p>Appendix 3 of the NPF introduced a new methodology for a two-tier approach to land zoning. National Policy Objective 72a requires Planning Authorities to apply a standardised, two-tier approach to differentiate between zoned land that is serviced; and, zoned land that is serviceable within the life of the County Development Plan. The NPF requires the County Development Plan to carry out an assessment of the required infrastructure to support any Tier 2 lands identified for development. In accordance with this new requirement, the Core Strategy is accompanied by a detailed Infrastructural Assessment attached as Appendix 1 to the Draft Plan. The assessment details the strategic infrastructural projects required to be delivered to enable residential development and is aligned with the delivery program of the relevant infrastructure providers. This new approach ensures a stronger linkage between the zoning of land for residential development and the availability of infrastructure to service same.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Planning permissions will need to continue at a rate which ensures a constant supply of residential units. Residential delivery needs to increase significantly (or population restructured) to prevent a shortfall in supply.</p>	<p><b>B1167</b></p>		<p>The Executive notes the issue raised.</p> <p>The new County Development Plan will provide the overarching Plan to guide the development management process for new residential schemes in the County. The Planning Authority performs a pro-active role in this regard, but it is ultimately the implementation of planning permissions and delivery of residential schemes that will ensure a constant supply of residential units. As evidenced in Figure 2.5 of the Draft Plan there is a significant quantum of existing extant residential planning permissions in place.</p> <p>The Local Authority will endeavour to employ all means within its powers to support an increase in the supply of appropriate residential development in the County. Section 2.6 of the Draft Plan is of particular relevance in this regard and sets out a multi-faceted approach to active land management which is intended to support the delivery of the Core Strategy.</p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
			<p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.2.3: Housing Target for the Core Strategy</b>			
<p>i) Submissions raise the following issues:</p> <ul style="list-style-type: none"> <li>• Submissions raise both supply and demand issues relating to the housing crisis and request these factors be addressed and incorporated into the calculation of the housing target, and subsequently the zoning of additional residential zoned lands to provide for same. The main issues raised include:</li> <li>• Taking account of pent-up housing demand (which is factored into the HST methodology).</li> <li>• Factoring in a prolonged period of undersupply in housing delivery.</li> <li>• Taking account of the impacts of the Covid-19 restrictions including both a reduction in the completion of new homes and reduction in new residential schemes commencing.</li> <li>• A position of equilibrium should not be assumed as a starting point for the calculation of the housing target.</li> </ul>	<p><b><u>B0595</u></b> <b><u>B0787</u></b> <b><u>B0815</u></b> <b><u>B0828</u></b> <b><u>B0840</u></b> <b><u>B0843</u></b> <b><u>B0928</u></b> <b><u>B0939</u></b> <b><u>B1010</u></b> <b><u>B1045</u></b> <b><u>B1057</u></b> <b><u>B1087</u></b> <b><u>B1120</u></b> <b><u>B1145</u></b></p>		<p>The Executive notes the issues raised.</p> <p>The methodology for calculating the housing target in the Core Strategy does not assume a position of equilibrium as its base point and furthermore, takes account of pent-up demand and historical and ongoing under supply in the delivery of housing. The calculation of the housing target in Table 2.7 of the Draft Plan calculates a housing requirement to provide for the overall population of Dún Laoghaire-Rathdown - in accordance with national and regional population allocations at a given end year – in this case 2028. This housing target factors in demand from both existing population and future population.</p> <p>The analysis set out in Section 2.3.3 of the Core Strategy found that the population in DLR increased by 11,757 people between the years 2011 and 2016 while the County’s housing stock only increased by 1,066 units. As noted, this under-supply in the provision of housing was evidenced in a reduction in residential vacancy by c.2,020 units, and also an increase in the average household size in the County.</p> <p>As stated in Section 2.3.6.2 an average household size of 2.5 is assumed for the period up to 2028, a decrease from 2.72 in 2016. This assumption was applied to calculate an overall housing stock figure required for all residents in the County - both existing and future. The application of a reduction in household size across all households in the County from 2.72 to 2.5 is a means of, in part, providing for existing pent-up demand. There is an assumed correlation between housing supply and household size.</p> <p>Table 2.7 of the Draft Plan calculates the Core Strategy housing target for the County based on population and housing stock data from 2016 (the most recent data available) and the end year of 2028. Actual CSO dwelling completion data is subtracted and any residual unmet supply is incorporated into the housing target. Thus, the undelivered component is carried over and maintained in the housing target, which informs the zoned land requirements. This approach is broadly similar to that applied in the Section 28 Guidelines - ‘<i>Housing Supply Target Methodology for Development Planning</i>’.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Since 2008, housing delivery targets set out in Core Strategies to address housing need have not been met, with the undeveloped allocation being brought forward into the next County Development Plan, rather than remaining with additional provision, to address the housing shortage.</p>	<p><b><u>B0581</u></b> <b><u>B0889</u></b></p>		<p>The Executive notes the issue raised.</p> <p>There would appear to be two issues to be addressed. Firstly, in terms of the role of housing targets contained in previous County Development Plans, these are in the process of being replaced, and as such they have been superseded in the context of a new national and regional planning policy framework, which is seeking to disrupt long established growth trends and move away from the current 'business as usual' pattern of development. There is no justification to incorporate any residual component of unmet housing targets which were based on regional plans which have now been superseded.</p> <p>As set out in response to the submissions above, the calculation of the housing target in Table 2.7 of the Draft Plan calculates a housing requirement to provide for the overall population of Dún Laoghaire-Rathdown which factors in demand from both existing population and future population. The application of a reduction in household size across all households in the County from 2.72 to 2.5 is a means of, in part, providing for existing pent-up demand as there is an assumed correlation between increasing housing supply and decreasing household size.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) The Planning Authority should take into account population headroom when undertaking the Housing Supply Target Methodology.</p>	<p><b><u>B1120</u></b> <b><u>B1145</u></b></p>		<p>The Executive does not agree with the issue raised.</p> <p>The Section 28 Guidelines - '<i>Housing Supply Target Methodology for Development Planning</i>' - set out a methodology for the calculation of a housing supply target. The methodology makes provision for certain local authorities, to increase housing provision up to 2026 in order to facilitate convergence with the NPF, or to allow for an increase in housing delivery where it already substantially exceeds the NPF 50:50 scenario. Dún Laoghaire-Rathdown does not meet the criteria for either adjustment scenario.</p> <p>There would appear to be no provision in the methodology for DLR to adjust the Housing Supply Target to factor in additional population headroom.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
iv) Expresses disappointment that the Core Strategy targets the delivery of only 20,669 no. additional homes and notes this is significantly less than the 30,885 no. units planned for under the current County Development Plan 2016-2022. Considers an additional 35,000 housing units would be an appropriate target.	<b>B0967</b>		<p>No change to Draft Plan.</p> <p>The Executive does not agree with the issue raised.</p> <p>The Core Strategy of the DLR County Development Plan 2016-2022 was framed by the housing target projections derived from the Regional Planning Guidelines for the Greater Dublin Area 2010-2022. The former Regional Planning Guidelines were replaced by the RSES 2019-2031 and as such the former housing targets have now been superseded.</p> <p>The RSES reflects the NPF which seeks to move away from the current 'business as usual' pattern of development which ultimately requires a realignment of land use policies at the local level. The incorporation of a housing target of 35,000 homes would be inconsistent with the provisions of the NPF and RSES.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
v) The significant number of units granted planning permission during 2020 reflect a 'pent up demand' from the period of the current County Development Plan and significantly reduce the capacity of zoned land for housing demand over the next six-year period.	<b>B0815</b>		<p>The Executive notes the issue raised.</p> <p>As noted above, the calculation of the housing target in Table 2.7 of the Draft Plan calculates a housing requirement to provide for the overall population of Dún Laoghaire-Rathdown which factors in demand from both existing population and future population. The application of a reduction in household size across all households in the County from 2.72 to 2.5 is a means of, in part, providing for existing pent-up demand as there is an assumed correlation between increasing housing supply and decreasing household size. Thus, the quantum of land identified in the Core Strategy makes provision for existing pent-up demand.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.2.3.1: Household Size</b>			
i) The household size used in the Core Strategy needs to be revised to reflect home/remote working requirements.	<b>B0840</b>		<p>The Executive does not agree with the issue raised.</p> <p>The location of a person's workplace is not considered a relevant factor in consideration of household size.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			No change to Draft Plan.
<b>3.2.4: Residential Development Capacity Audit</b>			
<p>i) There is a need to look at the potential of previously developed land before committing to expansion across the remaining green areas of the County.</p> <p>The Council have not fully explored maximising the development potential of brownfield and infill sites within the existing urban area of the County.</p>	<p><b><u>B0006</u></b> <b><u>B1027</u></b></p>		<p>The Executive notes the issue raised.</p> <p>The Residential Development Capacity Audit, which informs the Core Strategy, comprised a comprehensive review of all zoned residential and mixed-use land in the County. In order to support the compact growth agenda, a significant emphasis was placed on the identification of potential infill/brownfield sites for regeneration/redevelopment.</p> <p>The Draft Plan acknowledges that the delivery of a compact growth agenda requires increased focus on re-using previously developed brownfield land, supporting the appropriate development of infill sites, and the re-use or intensification of existing sites. Section 2.6.2 of the Draft Plan provides a framework for active land management and includes a range of measures which promote the development of infill and brownfield lands including: Policy Objective CS12: Brownfield and Infill Sites; Policy Objective CS13 – Strategic Regeneration; Policy Objective CS14 - Vacancy and Regeneration; and, Policy Objective CS15 - Vacant Site Levy.</p> <p>It is considered that the Draft Plan provides the appropriate balance between promoting the development of infill and brownfield lands, in addition to identifying strategically located greenfield sites that support the principles of consolidated growth.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission requests that the estimated residential yield in the Plan should be increased and that the additional yield could be accommodated in Cherrywood.</p>	<p><b><u>B0891</u></b></p>		<p>The Executive notes the issue raised. The Cherrywood Planning Scheme is made and amended under a separate legislative process to the County Development Plan. Development of any site that falls or partly falls with the Planning Scheme boundary is required to align with the provisions of the SDZ Planning Scheme.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submission questions the capacity of the infill/windfall sites to deliver the anticipated housing set out in Table 2.8.</p>	<p><b><u>B0967</u></b></p>		<p>The Executive notes the issue raised.</p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
			<p>The Residential Development Capacity Audit comprised an evidence-based approach to assess potential residential capacity and the density assumptions applied with respect to the category infill/windfall are consistent with the recommended residential densities in the Section 28 Guidelines - ‘Sustainable Residential Development in Urban Areas’ (2009). The primary density assumptions applied for the category infill/windfall were as follows:</p> <ul style="list-style-type: none"> <li>• Sites under Construction: Full allocation of residual unconstructed units from the planning permission.</li> <li>• Sites with no planning permission or planning permission not commenced: net density at 50 units per hectare.</li> </ul> <p>As set out in Section 2.3.7.1 of the Draft Plan, in order to provide for a balance between the inclusion of suitable infill and brownfield sites that promote compact growth, but which may not come forward for development within the lifetime of the Plan, and to ensure that sufficient lands are zoned to allow for overall projected growth, the residential yield for the category infill/windfall is calculated based on an assumption that half of the total site area (for sites where there is no construction activity) would be brought forward for development within the lifetime of the Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.2.4.1: Tiered Approach to Land Zoning</b>			
<p>i) Significant areas of land identified in the Draft County Development Plan will require the provision of supporting infrastructure. It is unlikely that the majority of lands zoned for residential uses will be developed over the lifetime of the Plan. Suggests this will result in a shortfall in housing delivery and exacerbate the housing shortage.</p>	<p><b>B0828</b></p>		<p>The Executive notes the issue raised.</p> <p>The NPF introduced a new methodology for a two-tier approach to land zoning. National Policy Objective 72a requires Planning Authorities to apply a standardised, two-tier approach to differentiate between: zoned land that is serviced; and, zoned land that is serviceable within the life of the County Development Plan. The NPF requires the County Development Plan to carry out an assessment of the required infrastructure to support any Tier 2 lands identified for development.</p> <p>In accordance with this new requirement, the Core Strategy is accompanied by a detailed Infrastructural Assessment attached as Appendix 1 to the Draft Plan. The assessment details the strategic infrastructural projects required to be delivered to enable residential development and is aligned with the delivery program of the relevant infrastructure providers.</p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
			<p>It is considered that this new approach ensures a stronger linkage between the zoning of land for residential development and the availability of infrastructure to service same. While the delivery of strategic infrastructure projects is ultimately dependent upon the availability of capital, the new methodology embraced in the Draft Plan seeks to ensure appropriate zoning in accordance with planned infrastructure provision which should serve to increase the certainty with respect to serviced land being made available for development.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) The Plan must acknowledge the importance of putting in place the infrastructure in advance of, and to facilitate, development.</p>	<p><b><u>B1047</u></b></p>		<p>The Executive notes the issue raised.</p> <p>As noted above, the Draft Plan includes, for the first time, an assessment of the strategic enabling infrastructure requirements for residential zoned lands across the County – see Appendix 1. The assessment focuses on the provision of infrastructure that is considered to be strategic in nature and is aligned with the delivery program of relevant infrastructure providers.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p><b>3.2.5: The Core Strategy</b></p>			
<p><b>3.2.5.1: DLR Settlement Strategy Statement</b></p>			
<p>i) Submissions raise concerns with regard to greenfield development at the fringes of the built-up area of the County and a reduction in the Green Belt. The main issues raised include:</p> <ul style="list-style-type: none"> <li>• The Plan relies excessively on green field sites and will reduce/omit the remaining Green Belt. The Green Belt should be retained and protected.</li> <li>• The Green Belt to the west of the M50/M11 should be maintained and future development restricted to the eastern side of the motorway.</li> </ul>	<p><b><u>B0006</u></b> <b><u>B0024</u></b> <b><u>B0043</u></b> <b><u>B0062</u></b> <b><u>B0230</u></b> <b><u>B0542</u></b> <b><u>B0740</u></b> <b><u>B0797</u></b> <b><u>B0847</u></b> <b><u>B1003</u></b> <b><u>B1027</u></b></p>		<p>The Executive notes the issues raised.</p> <p>DLR is a spatially small County and the vast bulk of its population is concentrated in a single urban/suburban mass between the foothills of the Dublin Mountains and the coast. To deliver plan-led growth in the County it is considered necessary to pursue a balanced approach to spatial development which supports both a compact growth agenda, through the densification of the existing built-up area of the County, and also through the identification of strategically located greenfield sites, which support the principles of sustainable development.</p> <p>In terms of applying the settlement hierarchy for the County, RPO 4.1 of the RSES provides that Local Authorities shall determine its hierarchy of settlements in accordance with the</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<ul style="list-style-type: none"> <li>• Development of Kiltiernan, Rathmichael and Old Connaught will result in expansion of the suburbs into rural and high amenity areas, cause sprawl and environmental impacts.</li> <li>• Greenfield development at the periphery should be avoided. Development in areas outside the M50 (e.g. Kiltiernan, Old Connaught) should be reduced.</li> <li>• The planned expansion of the 'new residential communities' will not deliver sustainable living.</li> <li>• There is no sense in building large developments in remote parts of the County which don't have sufficient infrastructure.</li> <li>• Kiltiernan's character must be maintained and DLRC must preserve and protect its environment.</li> <li>• Enough land is zoned in Kiltiernan.</li> <li>• Stepside, Kiltiernan and Glencullen areas to retain a rural environment.</li> <li>• Hedgerows, wildlife, history and character of Kiltiernan Glenamuck are being destroyed by poor planning decisions.</li> <li>• Request a commitment to the preservation of the green belt between Shankill and Bray.</li> </ul>	<p><b><u>B1056</u></b>  <b><u>B1155</u></b>  <b><u>B1165</u></b></p>		<p>hierarchy, guiding principles and typology of settlements set out in the RSES. Table 2.9 in the Draft Plan sets out the DLR settlement typology in the context of the RSES settlement hierarchy. The majority of the built-up footprint of DLR is located within the area defined as Dublin City and Suburbs, which comprises the first tier in the regional settlement hierarchy. With regard to the growth areas referred to in the submissions, the Kiltiernan LAP lands are located entirely within the Dublin City and Suburbs boundary while the Rathmichael lands are located within or contiguous to the boundary. Old Connaught is identified in the RSES for future growth as part of the westward expansion of the 'Key Town' of Bray which comprises tier 3 in the RSES Settlement Hierarchy.</p> <p>The Dublin MASP sets out a strategic planning and investment framework for the growth of the Dublin Metropolitan area which supports a sequential approach to residential development with a primary focus on the consolidation of sites within or contiguous to Dublin City and Suburbs. As detailed in Section 1.5.2.5 of the Draft Plan, the Dublin MASP identifies a number of strategic residential and employment development corridors. Within the North-South Corridor (DART), the MASP specifically identifies Old Connaught as suitable for the development of a new residential community, while within the Metrolink / LUAS Green Line Corridor, Kiltiernan-Glenamuck is identified as a new residential community.</p> <p>The Kiltiernan-Glenamuck, Rathmichael and Old Connaught areas have all been zoned for residential development through successive County Development Plans, and the provision of enabling infrastructure to service these areas is progressing. The development of these areas is contingent upon the timely delivery of supporting infrastructure and the Draft Plan includes an Infrastructure Assessment (Appendix 1) outlining both the requirement for, and status of, strategic enabling infrastructure projects required to support the development of these new communities.</p> <p>Development at Kiltiernan-Glenamuck has been planned for on a phased basis through the Kiltiernan-Glenamuck LAP to ensure the area develops in a plan-led manner, with development delivered in tandem with the delivery of enabling infrastructure and services. A similar phasing approach will be taken when preparing Local Area Plans for Old Connaught and Rathmichael.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<p>The lands at Old Connaught are zoned Objective 'A1' – <i>'To provide for new residential communities and Sustainable Neighbourhood Infrastructure in accordance with approved local area plans.'</i> As set out in Section 2.1, it is proposed to re-zone the lands at Rathmichael from Objective 'A' to Objective 'A1'. It is considered that a plan-led approach to the development of these new communities is of paramount importance to ensure their sustainable development and it is intended that detailed implementation plans incorporating appropriate phasing will be prepared as part of the Local Area Plan plan-making process for these areas.</p> <p>The Draft Plan does include a Strategic Land Reserve designation at 'GB' zoned lands to the north of Old Connaught. The rationale for inclusion of the Strategic Land Reserve is more comprehensively addressed below in Section 2.4.5 – Strategic Land Reserve.</p> <p>The Kiltiernan-Glenamuck, Rathmichael and Old Connaught areas represent a significant proportion of the County's residential landbank and it is not recommended to reduce or dilute their short to medium term development potential.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submissions recommend the increased prioritisation of compact growth:</p> <ul style="list-style-type: none"> <li>• Prioritise denser development along public transport routes and infill development on brownfield sites over greenfield development.</li> <li>• Focus development and increase residential densities within the existing built up footprint.</li> <li>• National policy is to prioritise compact growth.</li> <li>• New development should be focused within the existing built up area of the County.</li> <li>• Recommends we focus on higher density in existing urban areas.</li> <li>• Higher-density development is generally accepted as a sustainable and efficient way of delivering more housing.</li> </ul>	<p><b><u>B0024</u></b> <b><u>B0043</u></b> <b><u>B0062</u></b> <b><u>B0230</u></b></p>		<p>The Executive notes the issues raised.</p> <p>The NPF has a clear focus of increasing housing supply through compact growth in existing urban and built-up areas through brownfield or infill development. The delivery of a compact growth agenda comprises an important component of the Core Strategy of the Draft Plan.</p> <p>As set out in Section 2.4.2 the Settlement Strategy for the Draft Plan places a significant focus on delivering compact and sustainable growth within the existing built footprint of the County, building upon the existing physical, social, economic and natural assets which are available. Achieving compact growth targets will require active land management responses to ensure that land resources within existing settlements are used to their full potential. Section 2.6.2 of the Draft Plan introduces a new section in this regard which specifically focusses on active land management measures to support compact growth, brownfield and infill sites, strategic regeneration and vacancy.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<p>The Residential Development Capacity Audit which informs the Core Strategy (see Section 2.3.7) comprised a comprehensive review of all zoned residential and mixed-use land in the County and, in order to support the compact growth agenda, a significant emphasis was placed on the identification of potential infill/brownfield sites for regeneration / redevelopment. All densities applied are consistent with, or exceed, the residential densities recommended in the relevant national guidelines 'Sustainable Residential Development in Urban Areas' (2009).</p> <p>In conjunction with a compact growth approach the Draft Plan also acknowledges the importance of ensuring an appropriate balance between the need to provide for high quality sustainable residential development and the protection of existing residential amenities and the established character of the surrounding area. This approach is supported under Policy Objective PHP18: Residential Density. In addition to PHP18, the Draft Plan contains a series of Policy Objectives, including those within Section 4.4.1 'Quality Design &amp; Placemaking', and Development Management standards and guidance in Chapter 12 aimed at ensuring higher density development is provided for in an appropriate manner.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) The Draft Plan should concentrate housing developments in areas where the necessary infrastructure is in place such as Cherrywood, Kiltiernan and Woodbrook.</p> <p>Development in Cherrywood should be completed prior to any further development in the area.</p>	<p><b><u>B0222</u></b> <b><u>B1220</u></b></p>		<p>The Executive notes the comments of the submission.</p> <p>Areas such as Cherrywood, Kiltiernan-Glenamuck and Woodbrook-Shanganagh have all been planned for on a phased basis to allow for development to be delivered in tandem with the delivery of infrastructure. This phasing approach is evident within the adopted Cherrywood SDZ Planning Scheme, the Kiltiernan-Glenamuck LAP and the Woodbrook-Shanganagh LAP. A similar phasing approach will be taken when preparing Local Area Plans for additional new residential areas including, in particular, the Old Connaught and Rathmichael areas.</p> <p>The future development of these areas is contingent upon the timely delivery of supporting infrastructure and, as such, implementation plans incorporating phasing programmes will be prepared as part of the Local Area Plan making process linking development with the commensurate delivery of supporting infrastructure.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
iv) No more land around Kiltiernan should be rezoned unless existing constraints are resolved.	<b><u>B0761</u></b>	9	<p>No change to Draft Plan.</p> <p>The Executive notes the issue raised.</p> <p>The Draft Plan does not propose any additional residential rezoning in the Kiltiernan area.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
v) Requests the removal of the Rathmichael lands to the west of the M50 as a 'strategic growth area'.	<b><u>B1027</u></b>		<p>The Executive notes the issue raised.</p> <p>The Rathmichael lands are located within or contiguous to the boundary of Dublin City and Suburbs and represent a significant proportion of the County's residential landbank. It is not recommended to reduce or dilute this medium term development potential. The future development of Rathmichael is contingent upon the timely delivery of supporting infrastructure. An implementation plan incorporating a phasing programme will be prepared as part of a Local Area Plan for the area linking development with the commensurate delivery of supporting infrastructure. As evidenced in Section 4.7 of the Infrastructure Assessment (Appendix 1 of the Draft Plan), ongoing progress is being made with regard to the advancement of strategic enabling infrastructure required to service the area.</p> <p>In recognition of the current infrastructure constraints in the Rathmichael area, and in order to ensure plan-led growth and an appropriate prioritisation/sequencing of growth in the County, it is proposed to zone the lands at Rathmichael from Objective 'A' to Objective 'A1'.</p> <p>In recognition of the current infrastructure constraints in the Rathmichael area, and in order to ensure plan-led growth and an appropriate prioritisation/sequencing of growth in the County, it is proposed to re-zone the lands at Rathmichael from Objective 'A' to Objective 'A1' – <i>'To provide for new residential communities and Sustainable Neighbourhood Infrastructure in accordance with approved local area plans.'</i> This proposed amendment is set out in detail in Section 2.1 in response to the submission from the OPR.</p> <p><b>Recommendation</b> <i>See response and recommendation in section 2.1 above</i></p>
vi) Current development and expansion in the County along transport routes does not correlate with the	<b><u>B0590</u></b>		<p>The Executive notes the issue raised.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
County Development Plan's objectives for creating sustainable urban villages.			<p>The Settlement Strategy for the County is set out in Section 2.4.2 of the Draft Plan. It applies an asset-based approach to spatial development focusing employment and housing growth on existing and future transport corridors and aligning growth with the delivery of supporting enabling and supporting social infrastructure. The strategy seeks to deliver compact and sustainable growth within the existing built footprint of the County and build upon existing physical, social, economic and natural assets which are available. The strategy is supported by an increased focus on healthy place-making and the liveability factors which define our urban places.</p> <p>With respect to County Development Plan objectives for creating sustainable urban villages, Policy Objective PHP4: Villages and Neighbourhoods provides that it is a Policy Objective to implement a strategy for residential development based on a concept of sustainable urban villages; and, promote and facilitate the provision of '10-minute' neighbourhoods.</p> <p>It is considered that many of the principles set out in the overarching strategic level Settlement Strategy are applicable to the creation of sustainable urban villages.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
vii) In terms of planning for growth, particular focus should be given to areas at the edge of the Local Authority's boundary. Co-ordination with South Dublin, Dublin City, and Wicklow is essential in these areas.	<b><u>B1047</u></b>		<p>The Executive notes the issue raised.</p> <p>The Local Authority engages on various planning issues on an on-going basis with each of the respective Local Authority's which adjoin the County boundary. The Local Authority are also part of the MASP Implementation Group which includes representatives from inter alia Dublin City Council, South Dublin Council and Wicklow County Council.</p> <p>In terms of strategic growth, the Council continues to develop a close working relationship with Wicklow County Council to achieve common objectives including the water/wastewater and transport infrastructure projects required to unlock the significant development potential of the southern part of the County (and north Wicklow). With regard to the expansion of Bray – Fassaroe, Section 5.3.2 of the Draft Plan provides that the Council will collaborate with Wicklow County Council, the NTA and the TII to facilitate the delivery of enabling transport infrastructure to serve the area, which includes Old Connaught. In addition, SLO 107 provides that the Council will co-operate with the NTA, TII and Wicklow County Council in the</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<p>establishment of a combined road across the County Brook Valley to provide connections between the proposed new development areas of Fassaroe and Old Connaught.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.2.5.2: Figure 2.9: Core Strategy Map</b>			
<p>i) There is an anomaly on Figure 2.9 of the Draft Plan. Blackrock is identified as a District Centre, however the colour code in the legend does not correspond with the District Centre designation.</p>	<b><u>B1041</u></b>	2	<p>The Executive agrees with the issue raised.</p> <p>The colour-code in the legend for 'District Centre' does not correspond with that used on Figure 2.9- Core Strategy Map.</p> <p><b>Recommendation</b> Amend the colour attribution for 'District Centres', in the legend of Figure 2.9: Core Strategy Map, to correspond with the colour used in the Map.</p>
<b>3.2.5.3: DLR Core Strategy</b>			
<p>i) Submissions raise the following issues:</p> <ul style="list-style-type: none"> <li>• Submissions contend that it is unrealistic to assume that all, or even the majority of land zoned for residential development will be developed over the plan period. The Planning Authority should identify additional lands to meet the 6 year population / housing targets for the County and avoid exacerbating housing problems.</li> <li>• The 'just enough' approach to land use zoning which assumes the full build out of zoned land over a single Development Plan period will exacerbate housing problems.</li> <li>• An overly conservative approach to residential land use zoning will result in a significant shortfall in housing delivery.</li> <li>• The inclusion of all residential zoned / mixed use areas, including those lands identified for</li> </ul>	<p><b><u>B0787</u></b> <b><u>B0928</u></b> <b><u>B0939</u></b> <b><u>B1010</u></b> <b><u>B1057</u></b></p>		<p>The Executive notes the issues raised.</p> <p>It is highlighted from the outset that the Core Strategy does not assume a full build out of all lands identified in the Core Strategy Table within the lifetime of the Plan. The quantum of lands identified in the Core Strategy Table provides both for residential development for the duration of the plan period, in addition to residential development beyond the lifetime of the Plan. Allowing for residential development beyond the lifetime of the plan is primarily incorporated through the calculation of the population allocation which underpins the housing target and informs the residential zoned land requirements for the Plan.</p> <p>While the growth strategy for the NPF was initially informed by demographic analysis carried out by the ESRI in the publication 'Prospects for Irish Regions and Counties: Scenarios and Implications' (2018), the actual population allocations utilised by Local Authority's in the plan-making process comprise significantly modified versions of the initial demographic analysis. The breakdown of these population modifications are detailed in Section 2.1 of this Report in response to the submission from the OPR.</p> <p>The population allocation for DLR, which informs the housing target, is not solely based on demographic projections but incorporates additional criteria including: the potential for higher</p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
<p>strategic long-term development, such as Cherrywood and Sandyford UFP will result in a significant shortfall in housing delivery during the Plan period.</p> <ul style="list-style-type: none"> <li>• The Core Strategy incorrectly assumes that development will take place on all identified infill sites over the plan period and that all housing within the Cherrywood SDZ will be completed.</li> <li>• The approach in the Core Strategy does not have regard to the Guidance Note on Core Strategies (2010) for Planning Authorities to identify strategy land banks that have a longer 10 to 15+ year delivery timeframe.</li> <li>• The inclusion of strategic long-term development areas such as Cherrywood, Sandyford UFP and parts of Kiltiernan-Glenamuck LAP, within the Core Strategy figures capable of delivering on the 6 year population growth figures for the County, will result in a significant shortfall in housing delivery.</li> <li>• The Cherrywood SDZ should be considered a long-term strategic land bank and discounted from the land use zoning required to meet the population projections of the Plan period.</li> </ul>			<p>net in-migration; allowance to enable ambition and flexibility in planning for future growth; allowance to account for a transitional period to facilitate a more gradual re-alignment of existing zoning provisions with the new national growth strategy; allowance to account for additional headroom to meet demand beyond the lifetime of the Plan; and the incorporation of additional growth to allow for targeted growth in identified Key Towns.</p> <p>Each of these population modifiers increases the population utilised to calculate the housing target for the Plan period which subsequently informs the requirement for residential zoning. For example, the 25% population headroom allowance provided for in the NPF Roadmap enables provision to be made for more zoned land than is required to meet demand during the six-year timeframe of the County Development Plan. Thus, the quantum of lands identified for residential development exceeds that which is required for the plan period and as such a full build out of all lands is not necessitated to deliver the requisite housing for the plan period.</p> <p>An assumption regarding the build out of the category ‘infill/windfall’ was also applied in order to provide for a balance between the inclusion of suitable infill and brownfield sites that promote compact growth but also to acknowledge that sites may not come forward for development within the lifetime of the Plan. In order to ensure that sufficient lands were zoned to allow for overall projected growth, the residential yield for the category infill/windfall was calculated based on an assumption that half of the total site area (for sites where there is no construction activity) would be brought forward for development within the lifetime of the Plan. This assumption is detailed in Section 2.3.7.1 of the Draft Plan.</p> <p>The Core Strategy Table identifies an excess of existing zoned land in the County which equates to between 2,094 to 4,684 homes (this excess will increase to between 2,371 and 4,961 homes subject to the proposed amendments in response to the recommendations of the OPR being agreed – see Section 2.1). The rationale for maintaining the zoning of these lands is set out in Section 2.4.4 of the Draft Plan and specifically relates to the provisions of the ‘Guidance Note on Core Strategies’ (2010). The Draft Plan states that:</p> <p><i>‘While the Core Strategy Table below identifies an excess of between 2,094 and 4,684 units, reference is made to the Guidance Note on Core Strategies which advises that any excess (of lands or housing capacity) will not normally include lands identified for strategic long-term</i></p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
			<p><i>development as part of Strategic Development Zones or major regeneration sites within key areas. The full capacity of the Cherrywood Strategic Development Zone is incorporated into the Core Strategy Table below and comprises an estimated residential yield of between 5,596 to 8,186 units. <u>While the Cherrywood SDZ lands comprise Tier 1 and 2 zoned residential lands that may be developed within the lifetime of the Plan, it is acknowledged that the full build-out of Cherrywood may extend beyond the timeframe of the Plan.</u> In this context, and as provided for in the Guidance Note on Core Strategies, it is not considered necessary to apply any specific mechanisms to address the relatively minor excess identified in the Core Strategy Table.’</i></p> <p>Contrary to the commentary put forward in many of the submissions, the Core Strategy Table does not assume the full build out of the Cherrywood SDZ lands. As per the extract above, it is acknowledged that the full build-out of Cherrywood may extend beyond the timeframe of the Plan. This is the very rationale for maintaining an excess of residential zoned lands and is in accordance with the provisions of the ‘Guidance Note on Core Strategies’ (2010) which state that:</p> <p><i>‘Any excess under (3) above will not normally include lands identified for strategic long-term (i.e. 10 to 15+ year) development as part of Strategic Development Zones or major regeneration sites within key areas such as Dublin and Cork Docklands and strategic areas of other Gateway cities. Later phases of development in these strategic areas can be considered to form part of a strategic land bank within the development plan area that may take a number of development plan cycles to be realised.’</i></p> <p>The Executive does not agree with the request to discount the full residential component of the Cherrywood SDZ lands from the Core Strategy Table. It is anticipated that residential development will be delivered at the lands in the short term.</p> <p>With respect to other areas referenced in the submissions, including the Sandymount UFP lands and parts of the Kiltiernan-Glenamuck LAP, these areas are not considered to comprise strategic long-term development areas. Both of these areas have capacity to deliver residential development, in accordance with their respective planning schemes, in the short term and will support residential delivery during the lifetime of the Plan.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			No change to Draft Plan.
<p>ii) Re-zoning a considerable area of land that was previously zoned residential to 'SNI' reduces the extent of land available to deliver new housing in the County.</p>	<p><u><b>B0787</b></u> <u><b>B0928</b></u> <u><b>B1057</b></u></p>		<p>The Executive notes the issue raised.</p> <p>Lands re-zoned 'SNI' are primarily in use in accordance with their zoning objective. The re-zoning of lands as Objective 'SNI', has no material impact on the quantum of lands identified through the Residential Development Capacity Audit which informs the Core Strategy.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submission raises concerns regarding the reduction of c. 90 hectares from the land availability audit that informed the County Development Plan 2016-2022.</p>	<p><u><b>B0928</b></u> <u><b>B0939</b></u></p>		<p>The Executive notes the issue raised.</p> <p>The Core Strategy of the DLR County Development Plan 2016-2022 was framed by the housing target projections derived from the Regional Planning Guidelines for the Greater Dublin Area 2010-2022. The former Regional Planning Guidelines were replaced by the Regional Spatial and Economic Strategy 2019-2031. The RSES reflects the NPF which seeks to move away from the current 'business as usual' pattern of development which ultimately requires a realignment of land use objectives at the local level. The quantum of lands zoned identified under the 2016 County Development Plan has been superseded and the Core Strategy of the Draft Plan was prepared to be consistent with the new national and regional planning policy framework - the NPF and RSES.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Agrees that sufficient land is zoned for residential development and considers that any further rezoning should not be developer led.</p> <p>Welcomes that there is no requirement to zone any additional land for residential development.</p>	<p><u><b>B1126</b></u> <u><b>B1247</b></u></p>		<p>The Executive notes the contents of the submissions.</p> <p>The Draft Plan zones land in accordance with the provisions of the NPF and RSES.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>v) Submission highlights that the timeframe between zoning of lands and delivery of units can be considerable, and therefore the earlier the zoning the sooner housing stock can be brought forward.</p>	<p><u><b>B0939</b></u> <u><b>B0960</b></u> <u><b>B1010</b></u> <u><b>B1045</b></u></p>		<p>The Executive agrees with the issues raised.</p> <p>The Executive recognises the often significant timeframe between the zoning of lands for residential development and the delivery of housing. The quantum of lands identified in the Core Strategy provides both for residential development for the duration of the plan period in</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<p>The Council should look ahead beyond the next 6 years given the long delay between zoning and delivery.</p> <p>There should be an appropriate quantum of residential zoning which is capable of delivering housing within the Plan period and beyond.</p>			<p>addition to residential development beyond the lifetime of the Plan. Allowing for residential development beyond the lifetime of the plan is primarily incorporated through the calculation of the population allocation which underpins the housing target for the Plan – see Section 2.3.2 of the Draft Plan.</p> <p>While the growth strategy for the NPF was initially informed by demographic analysis carried out by the ESRI in the publication 'Prospects for Irish Regions and Counties: Scenarios and Implications' (2018), the actual population allocations utilised by Local Authority's in the plan-making process comprise significantly modified versions of the initial demographic analysis. The breakdown of these population modifications are detailed in Section 2.1 of this Report in response to the submission from the OPR.</p> <p>The population allocation for DLR, which informs the housing target, is not solely based on demographic projections but incorporates additional criteria including: the potential for higher net in-migration; allowance to enable ambition and flexibility in planning for future growth; allowance to account for a transitional period to facilitate a more gradual re-alignment of existing zoning provisions with the new national growth strategy; allowance to account for additional headroom to meet demand beyond the lifetime of the Plan; and the incorporation of additional growth to allow for targeted growth in identified Key Towns. Of these modifiers, particular attention is drawn to the 25% population headroom allowance, as provided for in the NPF Roadmap. This population allowance enables provision to be made for more zoned land than is required to meet demand during the six-year timeframe of the County Development Plan.</p> <p>The Draft County Development Plan also makes provision for a Strategic Land Reserve. The concept of the SLR is to make provision for designated future growth beyond the timeframe of the Plan period. It is highlighted, however, that the SLR is not zoned for residential development, but rather an early stage protection to protect the lands for potential future residential growth.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
vi) Submission queries the Core Strategy figures. Suggests that as the Core Strategy identifies	<b>B0518</b>		The Executive notes the issue raised.

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<p>significant existing lands already zoned for residential development, that the Council should limit unnecessary and unsympathetic over densification within existing established communities.</p>			<p>The NPF has a clear focus of increasing housing supply through compact growth in existing urban and built-up areas through brownfield or infill development. The delivery of a compact growth agenda comprises an important component of the Core Strategy of the Draft Plan.</p> <p>In conjunction with this approach the Draft Plan acknowledges the importance of ensuring an appropriate balance between the need to provide for high quality sustainable residential development and the protection of existing residential amenities and the established character of the surrounding area. This approach is supported under Policy Objective PHP18: Residential Density. In addition to PHP18, the Draft Plan contains a series of Policy Objectives, including those within Section 4.4.1 'Quality Design &amp; Placemaking', and Development Management standards and guidance in Chapter 12 aimed at ensuring higher density development is provided for in an appropriate manner.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>vii) Submission questions the capacity of the Rathmichael Strategic Growth Area to absorb new residential development and notes there is no Local Area Plan prepared for the area. Suggests the appropriate target for Rathmichael should be 1,000-1,500 homes and the remaining 1,000 homes re-allocated to the lands identified in the Draft Plan as a Strategic Land Reserve.</p>	<p><b>B0967</b></p>	<p>10, 14</p>	<p>The Executive does not agree with the issue raised.</p> <p>The estimate of c. 2,400 homes for the Rathmichael area is based on the very sizeable quantum of residential zoned land that exists in the area – over 80 hectares in total. The Rathmichael lands are located within or contiguous to the boundary of Dublin City and Suburbs and represent a significant proportion of the County's residential landbank. It is not recommended to reduce or dilute this medium-term development potential.</p> <p>As detailed in Section 2.1 of this Report it is proposed to re-zone the Rathmichael lands from Objective 'A' to Objective 'A1' – <i>'To provide for new residential communities and Sustainable Neighbourhood Infrastructure in accordance with approved local area plans.'</i> It is considered that a plan-led approach to the development of Rathmichael is of paramount importance to ensure the proper planning and sustainable development of the area, and it is the intention of the Council to prepare a Local Area Plan for Rathmichael during the lifetime of the County Development Plan. The future development of the area is contingent upon the timely delivery of supporting infrastructure and an implementation plans incorporating phasing will be prepared as part of the Local Area Plan making process, linking development with the commensurate delivery of supporting infrastructure.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<p>The designation of the Strategic Land Reserve relates to the approval, under NPO 68 of the NPF, by the Elected Members of the Regional Assembly for a transitional population allowance of 13,000 for the Key Town of Bray, 3,500 of which is applicable to the DLR administrative area. To provide for the population allocated under NPO 68, the potential Strategic Land Reserve was identified. The Executive does not agree that additional residential units should be allocated to lands identified for potential long term expansion beyond the lifetime of the Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.2.5.4: Strategic Land Reserve</b>			
i) The designation of lands as a Strategic Land Reserve is welcomed.	<b><u>B0928</u></b>	14	<p>The Executive notes the contents of the submission.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
ii) The Strategic Land Reserve should be omitted and lands in the Green Belt kept free from development. There are sufficient lands already zoned for future development in the Shankill area. It is important to have clear delineation between urban areas.	<b><u>B0555</u></b> <b><u>B0669</u></b> <b><u>B0702</u></b> <b><u>B1003</u></b>	14	<p>The Executive notes the issue raised.</p> <p>In accordance with the NPF and the RSES, the Elected Members of the Regional Assembly approved a transitional population allowance of 13,000 for the Key Town of Bray, 3,500 of which is applicable to the DLR administrative area. The 3,500 re-allocation of population is applied to the 2031 high growth scenario of the RSES and as such, in part, falls outside the timeframe of the County Development Plan. Given the regional designation and specific population allocation for the Key Town of Bray it is considered appropriate to identify a potential 'Strategic Land Reserve' to meet the designated future growth beyond the timeframe of the Plan period.</p> <p>The Executive considers that the identification of a SLR at Old Connaught comprises an important designation to enable the Local Authority to adopt a planned approach to the long-term sustainable development of the south east of the County, where the delivery of significant strategic infrastructure projects including water, wastewater, road and public transport infrastructure, can be better aligned with a longer-term horizon for growth in the area.</p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
			<p>The lands identified as a Strategic Land Reserve comprise c. 38 hectares and include significant provision for educational, open space and recreational facilities. Under Policy Objective CS5 – Strategic Land Reserve, it is a Policy Objective to protect the strategic land reserve for potential future residential growth. This approach to medium/long term spatial growth is consistent with the provisions of NPO 62 of the NPF which identifies the role of Green Belts to include for inter alia the long-term strategic expansion of urban areas.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Requests the Council takes in charge the Green Belt.</p>	<p><b>B0702</b></p>	<p>14</p>	<p>The Executive notes the issue raised.</p> <p><b>This is not a County Development Plan issue but a taking in charge/ownership issue which is not within the scope of the County Development Plan.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p><b>3.2.5.5: Demand for Employment Zoned Lands</b></p>			
<p>i) There are insufficient employment zoned land to meet projected demand over the plan period. The Draft Plan underestimates employment zoning requirements and additional employment zoning is required.</p>	<p><b>B1234</b></p>		<p>The Executive does not agree with the issue raised.</p> <p>Section 2.4.8.4 of the Draft Plan set out an evidence-based analysis to estimate the requirement for employment zoned lands in the County. The purpose of the analysis is to ascertain whether sufficient employment lands are zoned to provide for the projected additional workforce resident in DLR for the Plan period to 2028.</p> <p>It is highlighted that the location of future employment in DLR is not located solely within the main Objective ‘E’ zoned employment lands but rather spread across a range of zoning categories including significant concentrations in Major Town Centre and District Centre lands, where commercial development is ‘Permitted in Principle’. The Sandyford Business District has a variety of ‘subset’ employment zone types while the Cherrywood SDZ provides for employment both in High Intensity Employment and Commercial zoned lands as well as Town Centre and Village Centre zonings. The largest single location for employment in the County is at UCD which employs c. 3,600 academic and support staff and is located on lands zoned Objective TLI ‘To facilitate the development of Third Level Institutions’. There are also significant numbers of jobs located within Objective ‘A’ and Objective ‘SNI’ zoned lands - in</p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
			<p>schools, crèches, community facilities, working from home and employees with no fixed place of work.</p> <p>Table 2.14 of the Draft Plan sets out the Strategic Employment Locations in the County. As stated, it is considered that there is significant opportunity for increased land efficiency and densification through intensification of existing brownfield commercial sites for additional High Intensity Employment at the Sandyford Business District. In addition, both Cherrywood and Carrickmines are identified as key strategic employment locations for High Intensity Employment, while there is potential for the development of key strategic urban regeneration sites for employee-intensive development at the County’s Major Town Centres. In accordance with the provisions of Table 2.14, the spatial strategy for future employment growth incorporates identifies both undeveloped strategic employment locations in addition to the intensification of existing brownfield/urban regeneration sites both in the Sandyford Business District and also the County’s Major Town Centres, as locations suitable for high intensity employment.</p> <p>It is highlighted that the submission received from EMRA assessed the Employment Strategy of the Draft Plan and considered it to be consistent with the RSES Guiding Principles for the Location of Strategic Employment and informed by a robust evidence-based analysis of employment lands.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.2.5.6: Employment Strategy</b>			
<p>i) There is a need for enhanced public transport services, recreational amenities and sustainable affordable housing at strategic employment locations.</p>	<p><b>B0840</b></p>		<p>The Executive notes the issue raised.</p> <p>The Draft Plan recognises that the success of enterprise and employment in the County is intertwined with maintaining and enhancing the attractiveness of the County as a high-quality place to live, work and visit. It is this wider package, which includes everything from high quality public transport and active travel, supporting physical infrastructure, availability of housing, education infrastructure, quality place-making and heritage, culture, recreational and community facilities, which will ultimately attract business and ensure the County works better for all.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<p>It is highlighted that the Council are a facilitator of public transport services rather than a provider. Notwithstanding, there are a range of Policy Objectives included in Chapter 5 'Transport and Mobility' which support improvements in public transport. Chapter 8 'Green Infrastructure and Biodiversity' and Chapter 9 'Open Space, Parks and Recreation' include a myriad of Policy Objectives supporting improvements in recreation amenities across the County. The issue of affordable housing is addressed in Section 4.3.2 of this Report 'Housing Choice'.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Supports national and regional policies regarding the intensification and potential for enterprise and job creation at key locations such as Sandyford and Carrickmines which have significant locational advantages and benefit from substantial infrastructural investment.</p>	<b><u>B0877</u></b>		<p>The Executive notes the contents of the submission.</p> <p>The Employment Strategy of the Draft Plan (see Section 2.4.8.5) identifies both Sandyford and Carrickmines as key strategic employment location for High Intensity Employment situated on high frequency public transport corridors, aligning employment growth with both existing and new residential communities.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Employment zones should be located close to key transport hubs such as DART or Luas stations.</p>	<b><u>B1047</u></b>		<p>The Executive agrees with the issue raised.</p> <p>The Employment Strategy of the Draft Plan (see Section 2.4.8.5) seeks to align strategic employment locations with existing and identified residential growth areas through high frequency transport and minimise the divergence between the places people live and work, increasing the efficiency of land-use, reducing sprawl and minimising carbon footprint.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Submission considers that there is a notable absence of commercial development in Cherrywood.</p>	<b><u>B1047</u></b>		<p>The Executive notes the issue raised.</p> <p>The Cherrywood Planning Scheme is made and amended under a separate legislative process to the County Development Plan. Development of any site that falls or partly falls with the Planning Scheme boundary is required to align with the provisions of the SDZ Planning Scheme.</p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
			<p><b>Recommendation</b> No change to Draft Plan.</p>
<p>v) Submission refers to the emphasis in the NPF on brownfield development and the renewal and development of existing urban areas. Considers that the change in zoning of well serviced but under-utilised employment zones to become high-density residential and mixed-use developments will be critical to meeting the goals of the NPF and MASP.</p>	<p><b>B1047</b></p>		<p>The Executive does not agree with the issue raised.</p> <p>While a sufficient quantum of employment zoned lands are available to facilitate continued economic development and employment growth in the County over the Plan period it is noted that the extent of the employment landbank in DLR is quite low in comparison to adjoining Counties in the Dublin MASP area, and as such, there is an enhanced need to retain and protect these lands for employment purposes.</p> <p>With regard to brownfield development and regeneration, the Draft Plan incorporates a comprehensive active land management strategy in Section 2.6.2 of the Draft Plan to support the delivery of national and regional objectives.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p><b>3.2.6: Ecosystems Services Approach and Natural Capital</b></p>			
<p>i) Submission supports the inclusion of measures to avoid the looming environmental crisis. Suggests the Core Strategy should have focussed on healing the harm done to the environment rather than increasing the dangers already present.</p>	<p><b>B0047</b></p>		<p>The Executive notes the issue raised.</p> <p>The settlement strategy for the Core Strategy seeks to support the transition to a low carbon and climate resilient County through the implementation of a compact growth agenda, increased integration between land-use and transportation, increased sustainable mobility and the sustainable management of our environmental resources.</p> <p>As set out in Section 2.5, the Draft County Development Plan follows an Ecosystems Services Approach which provides a strategy for the integrated management of land, water and living resources that promotes conservation and sustainable use in an equitable way. In terms of natural capital, Policy Objectives have been integrated into the Draft Plan that will contribute towards the management of air quality, noise pollution, light pollution, pollination, flood risk, water bodies and river basins and natural resources supporting energy production and recreation.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			No change to Draft Plan.
ii) Welcomes the integration of the Ecosystems Services Approach into the Draft Plan.	<b><u>B1247</u></b>		The Executive welcomes the comment made.  <b>Recommendation</b> No change to Draft Plan.
<b>3.2.7: Implementation and Delivery</b>			
i) Highlights the importance of building more housing.	<b><u>B0765</u></b>		The Executive notes the issue raised.  The Local Authority will endeavour to employ all means within its powers to support appropriate residential development in a timely manner. Section 2.6 of the Draft Plan is of particular relevance in this regard and sets out a multi-faceted approach to support the delivery of the Core Strategy.  <b>Recommendation</b> No change to Draft Plan.
<b>3.2.7.1: Cherrywood Strategic Development Zone</b>			
i) Cherrywood should be regarded as a suitable location for an increase in projected population, due to its strategic location and extensive facilities and services under construction and permitted.	<b><u>B0891</u></b>	7,9 & 10	The Executive notes the issue raised.  The Cherrywood Planning Scheme is made and amended under a separate legislative process to the County Development Plan. Development of any site that falls or partly falls with the Planning Scheme boundary is required to align with the provisions of the SDZ Planning Scheme.  <b>Recommendation</b> No change to Draft Plan.
ii) Concern that Cherrywood is constrained and is being held back by its SDZ designation and whilst it does access new policy, it is at a slower pace due to amendment process.	<b><u>B1067</u></b>	7,9 & 10	The Executive notes the issue raised.  The Cherrywood Planning Scheme is made and amended under a separate legislative process to the County Development Plan. Development of any site that falls or partly falls with the Planning Scheme boundary is required to align with the provisions of the SDZ Planning Scheme.  <b>Recommendation</b>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			No change to Draft Plan.
iii) Submission considers that residential is now much more viable in Cherrywood and the Draft Plan has captured this trend in Policy Objective RET5: District Centres. This sentiment supports the view that the Cherrywood Town Strategy should be reviewed in terms of land use mix and density/height.	<b>B1067</b>	7,9 & 10	<p>The Executive notes the issue raised.</p> <p>The Cherrywood Planning Scheme is made and amended under a separate legislative process to the County Development Plan. Development of any site that falls or partly falls with the Planning Scheme boundary is required to align with the provisions of the SDZ Planning Scheme.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
iv) Res 3 and 4 plots in Cherrywood are constrained by unit per hectare density metrics which are out of date.	<b>B1067</b>	7,9 & 10	<p>The Executive notes the issue raised.</p> <p>The Cherrywood Planning Scheme is made and amended under a separate legislative process to the County Development Plan. Development of any site that falls or partly falls with the Planning Scheme boundary is required to align with the provisions of the SDZ Planning Scheme.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.2.7.2: Local Area Plan-Making Programme</b>			
i) Welcomes the commitment to the preparation of a LAP for Rathmichael.	<b>B0260</b>	10 & 14	<p>The Executive notes the comments made.</p> <p>Rathmichael is identified in the Local Area Plan-Making Programme set out in Table 2.15 of the Draft Plan. It is the intention of the Council to prepare a LAP for Rathmichael during the lifetime of the County Development Plan.</p> <p>An indicative LAP boundary on Land Use Map Nos. 10 and 14, is proposed to be incorporated by way of an amendment to the Draft Plan (see response in Section 2.1 above).</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
ii) Submission notes the ambitious Local Area Plan programme included in Table 2.15 and questions whether all the LAPs meet the provisions of Section	<b>B0260</b>		The Executive notes the issue raised. The Draft County Development Plan proposes an ambitious programme of LAP plan-making. Section 19(1)(a) of the Planning and Development Act, 2000, (as amended), provides that a LAP may be prepared in respect of any area, or an

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
19(1)(a) of the Planning and Development Act, 2000, (as amended).			<p>existing suburb of an urban area, which the Planning Authority considers suitable and, in particular, for those areas which require economic, physical and social renewal and for areas likely to be subject to large scale development within the lifetime of the Plan.</p> <p>As set out in Section 2.6.1.3, in delivery of the programme of LAP plan-making, the Planning Authority will prioritise areas in accordance with the overarching strategic objectives of the Core Strategy including those areas which are experiencing and/or likely to experience large scale development or regeneration.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) With regard to the Goatstown LAP, the submission requests that:</p> <ul style="list-style-type: none"> <li>• Objectives in the LAP are progressed.</li> <li>• The boundary of the LAP is extended to include Our Lady's Grove School.</li> <li>• The County Development Plan drills down more in relation to a village / neighbourhood centre, which is emphasised in the LAP.</li> </ul>	<p><b>B0529</b> <b>B1134</b></p>	<p>1</p>	<p>The Executive notes the issues raised. It is acknowledged that a range of policies and objectives from the Goatstown LAP have not yet been delivered but delivery is dependent on appropriate schemes coming forward as the sites identified in the Plan are in private ownership. The boundary of a current Local Area Plan cannot be extended by way of the County Development Plan.</p> <p>A comprehensive and detailed planning policy framework is set out in Chapter 4 'Neighbourhood - People, Homes and Place' which supports the concept of sustainable neighbourhoods and villages. Particular reference is made to Policy Objective PHP2: Sustainable Neighbourhood Infrastructure, Policy Objective PHP3: Planning for Sustainable Communities and Policy Objective PHP4: Villages and Neighbourhoods.</p> <p>It is recommended that the Draft County Development Plan be amended to incorporate a number of the objectives set out in the Goatstown Local Area Plan through the identification of a Specific Local Objective.</p> <p><b>Recommendation</b> Amend the list of 'Specific Local Objectives' in Chapter 14 (page 319) and associated Land Use Maps.</p> <p><b>Maps No. 1 – Include the following new SLO</b></p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<i>Any redevelopment of the Goat site should include the creation of a village square/civic space and a new pedestrian friendly street and should improve the appearance, quality and overall function of the public realm within the area.</i>
iv) Submissions request the Local Area Plan for Dundrum to be completed as soon as possible, to ensure protection of the character of the area and to manage development and address issues for Dundrum, including building height.	<b>B0794</b> <b>B1124</b>	1,5	<p>The Executive notes the issue raised. It is intended that a new Local Area Plan will be prepared for Dundrum. The plan-making programme set out in Table 2.15 of the Draft Plan identifies the Dundrum LAP as 'Plan being prepared'. It is anticipated that the Draft Dundrum LAP will be progressed post adoption of the County Development Plan. This sequencing approach will ensure appropriate alignment between the overarching and up to date policy direction of the new County Development Plan and the new LAP. Section 7.5.2 of the Draft Plan provides additional detail and guidance with regard to the preparation of a Local Area Plan for Dundrum.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
v) Submissions welcome the forthcoming Local Area Plan for Dún Laoghaire and Environs. Highlight the importance of progressing the LAP within the lifetime of the County Development Plan.	<b>B0876</b> <b>B0905</b> <b>B0947</b>	3	<p>The Executive notes the issue raised. It is the intention of the Council to prepare a Local Area Plan for the Dún Laoghaire and Environs Area during the lifetime of the County Development Plan. Dún Laoghaire and Environs is identified in the Local Area Plan-Making Programme set out in Table 2.15 of the Draft Plan and an indicative Local Area Plan boundary is included on the Land Use Map No. 3.</p> <p>Policy Objective CS10 specifically states that plan areas will be prioritised in accordance with the overarching strategic objectives of the Core Strategy including those areas which are experiencing and/or likely to experience large scale development or regeneration.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
vi) Requests that Policy Objective CS10: Local Area Plans is amended to read as follows:  <i>To prioritise the preparation of the Dún Laoghaire LAP to promote the regeneration and integration of Dún Laoghaire harbour and town centre, sustaining a resilient creative collaborative connected vibrant town centre and harbour based on a bold</i>	<b>B0876</b>	3	<p>The Executive does not agree with the recommendation of this submission.</p> <p>Policy Objective CS10 Local Area Plans is the overarching strategic objective relating to the implementation of the Local Area Plan plan-making programme as a whole. Policy Objective CS10 specifically states that plan areas will be prioritised in accordance with the overarching strategic objectives of the Core Strategy including those areas which are experiencing and/or likely to experience large scale development or regeneration.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<i>imaginative public arts initiative as the foundation of urban regeneration policy and objectives.</i>			<p>It is considered that the request to amend Policy Objective CS10 to prioritise the preparation of one specific LAP would undermine the intent and purpose of the existing strategic level Policy Objective.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
vii) Submission considers that an overall sewage scheme may need to be considered as part of a Local Area Plan for Glencullen.	<b>B0892</b>	12 & 13	<p>The Executive notes the issue raised. It is intended that a new Local Area Plan will be prepared for Glencullen Village and its Environs - see Table 2.15 of the Draft Plan. As part of the LAP plan-making process for Glencullen, the Planning Authority will determine the scope of objectives required to be included to ensure the proper planning and sustainable development of the area.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
viii) Submissions express disappointment with the implementation of the Kiltiernan Glenamuck LAP and the Village Centre. Provides commentary with regard to strengthening of the Local Area Plan, including a future vision for the area and use of granite in developments.	<b>B1056</b> <b>B1126</b>	9	<p>The Executive notes the issue raised.</p> <p>The approved Kiltiernan-Glenamuck LAP 2013 provides detailed guidance on future development within the Plan area. This existing LAP is considered to comprise a robust local-level planning framework and it is not being reviewed as part of the current County Development Plan plan-making process. The existing LAP is due to expire in 2023 and, as set out in Table 2.15 of the Draft Plan, the Planning Authority intends on preparing a new LAP for Kiltiernan-Glenamuck. The preparation of a new plan for Kiltiernan-Glenamuck will afford an opportunity to put in place a new local level planning policy framework, albeit aligned with the overarching and up to date policy direction of the new County Development Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.2.7.3: Compact Growth and Regeneration</b>			
i) Policy should encourage densification and infill development over new build as much as possible. Planning policy should ensure that homes are delivered within existing settlement boundaries.	<b>B1088</b>		<p>The Executive notes the issue raised.</p> <p>The development of infill and brownfield lands comprises a key component part of the Settlement Strategy for the County – see Section 2.6.2. To enable appropriate brownfield and infill development the Draft County Development Plan sets out planning policies and standards focusing on design-led and performance-based outcomes with the objective of</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<p>urban infill and brownfield development objectives which safe-guard against poor quality design and deliver well-designed development proposals. These policies and objectives are primarily set out in Chapter 4 '<i>Neighbourhood - People, Homes and Place</i>' and Chapter 12 '<i>Development Management</i>'.</p> <p>The Draft County Development Plan has introduced a number of new Policy Objectives to specifically support the compact growth agenda. Under Policy Objective CS12 – Brownfield and Infill Sites, the Planning Authority commits to the establishment of a database of strategic brownfield and infill sites to be regularly updated and monitored so that brownfield re-use can be managed and co-ordinated. Under Policy Objective CS13 – Strategic Regeneration, the Planning Authority will support the development and renewal of specified large-scale strategic regeneration sites which have the potential to deliver compact and sustainable growth within the existing built footprint of the County. Policy Objective CS14 - Vacancy and Regeneration seeks to address issues of vacancy and underutilisation of lands within the County and encourage and facilitate the re-use and regeneration of vacant sites, while Policy Objective CS15 - Vacant Site Levy, supports the development of vacant sites for housing and regeneration purposes through active implementation of the provisions of the Urban Regeneration and Housing Act 2015 (as amended).</p> <p>With respect to settlement boundaries, the RSES requires the Planning Authority to set out measures to achieve a compact growth target of at least 50% of all new homes within or contiguous to the existing built up area of 'Dublin City and Suburbs', and a target of at least 30% for other urban areas (RPO 3.2). The vast majority of growth identified in the Core Strategy is located within the Dublin City and Suburbs boundary while growth areas at Woodbrook and parts of Cherrywood and Rathmichael are contiguous to the boundary.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.2.7.4: Vacant Sites</b>			
i) A vacant land tax should be introduced to combat land hoarding.	<b>B0043</b>		<p>The Executive notes the issue raised.</p> <p>The Urban Regeneration and Housing Act 2015 (as amended) makes provision for a vacant site levy to incentivise the development of vacant and under-utilised sites in urban areas for housing and regeneration purposes. The Planning Authority actively implements the vacant</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<p>site legislation as an important component part of its active land management strategy. This approach is comprehensively detailed in Section 2.6.2.2 of the Draft Plan – Vacant Sites.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Requests that Policy Objective CS14 is replaced with the following:</p> <p><i>It is a Policy Objective to address issues of vacancy of buildings and underutilisation of lands by facilitating and promoting and subsidising their use for art initiatives addressing any impediments to such vibrant art use.</i></p>	<b>B0876</b>		<p>The Executive does not agree with the submission.</p> <p>Policy Objective CS14 of the Draft Plan is a strategic level policy which seeks to address issues of vacancy and regeneration in a holistic manner. It is considered that the intended purpose and use of lands that may be vacant or require regeneration should be guided by the land use zoning pertaining to the relevant site / lands.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>



### 3.3: Chapter 3 - Climate Action

The Executive welcomes the extremely positive commentary on Climate Action in the submissions received. Many issues raised fall outside the remit of the County Development Plan and therefore the responses indicate that they are not County Development Plan issues. It should be noted however that there is nothing in the Plan that necessarily precludes any of the initiatives or suggestions put forward.

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
<b>3.3.1: Introduction</b>			
<p>i) Welcomes a standalone Chapter on Climate Action.</p> <p>Commends the overall approach to climate change in the plan</p> <p>Welcomes the Chapter and especially the approach to urban greening and micro wind and solar.</p>	<p><b><u>B0271</u></b>  <b><u>B0319</u></b>  <b><u>B0557</u></b>  <b><u>B0558</u></b>  <b><u>B0587</u></b>  <b><u>B0794</u></b>  <b><u>B1088</u></b></p>		<p>The Executive welcomes the positive comments on the issues raised.</p> <p>In view of the increasing importance being assigned to the ‘Just Transition’ it is considered appropriate to acknowledge this in the Introduction to this Chapter.</p> <p><b>Recommendation</b>  <i>Insert the following text at the start of the 6<sup>th</sup> paragraph in Section 3.1 Introduction (page 51) <u>“The all of Government Climate Action Plan 2019 commits to delivering a ‘just transition’, recognising the significant level of change required and that burdens borne must be seen to be fair across society. Relevant Council policy will evolve to reflect this emerging policy area.”</u></i></p>
<b>3.3.2 International, National and Regional Policy</b>			
<b>3.3.2.1: Policy Objective CA1: National Climate Action Policy</b>			
<p>i) Issues raised regarding the Climate Action and Low Carbon Development (Amendment) Bill 2021:</p> <ul style="list-style-type: none"> <li>• The Plan must reflect the ‘Climate Action and Low Carbon Development (Amendment) Bill 2021’ and Development Plans must align with their Climate Action Plan.</li> <li>• A review of the Plan should be undertaken to confirm that the Plan is compatible with the Government’s carbon reduction trajectory. That the draft County Development Plan acknowledges clearly that County-level targets and plans will need to be strengthened once the new Climate Bill is enacted, and the</li> </ul>	<p><b><u>B0942</u></b>  <b><u>B0271</u></b>  <b><u>B1198</u></b></p>		<p>The Executive notes the issues raised and agrees that amendments need to be made to the Draft. This issue is addressed above in section 2.1 response to the Planning Regulator on the issue of Climate Action.</p> <p><b>Recommendation</b>  <i>See response and recommendation to OPR Observation number 2 as set out in section 2.1 above.</i></p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<p>subsequent, more ambitious, national Climate Action Plan put in place</p> <ul style="list-style-type: none"> <li>Will the Climate Action and Low Carbon Development (Amendment) Bill 2021 have any input on this plan?</li> </ul>			
<b>3.3.2.2: Policy Objective CA3: Measuring Greenhouse Gas Impacts</b>			
<p>i) Submission queries:</p> <ul style="list-style-type: none"> <li>Whether Council intend to report on Measuring Greenhouse Gas Impacts at Council meetings and</li> <li>whether the new Amendment Bill 2021 will have any impact on the plan?</li> <li>Whether the County Development Plan commit resources to ensuring that methodologies for integrating 'climate change issues' into the Development Plan process (p.53) and for quantifying GHG impacts of spatial planning policies (3.2.3 CA3) are developed and made available as rapidly as possible.</li> </ul>	<p><b>B0942</b> <b>B0271</b></p>		<p>The Executive notes the issues raised. Reporting on GHG emissions will be done in accordance with forthcoming guidance. The 2 Year Progress Report can report on this and will be brought to Council. It is stated in Policy Objective CA3: Measuring Greenhouse Gas Impacts (page 53) that the "Council will quantify the GHG impacts for this County Development Plan when EMRA guidelines become available". An amendment with regard to the new Act is set out in the recommendation in section 2.1 above. <b>The provision of resources both financial and human to deliver Council services are a workforce plan and budget matter and not a County Development Plan matter.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.3.3: Local Climate Change Action Policy</b>			
<b>3.3.3.1: Policy Objective CA4: Dún Laoghaire-Rathdown County Council Climate Change Action Plan, 2019-2024</b>			
<p>i) DLR Climate Change Action Plan (2019 to 2024) is an excellent document.</p>	<p><b>B1195</b></p>		<p>The Executive welcomes the positive sentiments raised with regard to the DLR Climate Action Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) In terms of an emissions inventory:</p> <ul style="list-style-type: none"> <li>The Plan should include an undertaking to establish the net GHG emissions inventory of all activity and then drive that to net zero.</li> <li>A carbon emissions baseline study should outline specific actions that seek to combat,</li> </ul>	<p><b>B0044</b> <b>B0627</b> <b>B0942</b> <b>B1195</b></p>		<p>The Executive notes the issues raised and welcomes the positive commentary on Council work. A baseline emissions inventory has been prepared as part of the Dún Laoghaire-Rathdown County Council Climate Change Action Plan, 2019-2024. Reporting on GHG emissions will be done in accordance with forthcoming Guidelines.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<p>reduce or eliminate the emissions of greenhouse gases in the area, and outline key indicators for the monitoring of progress on climate action.</p> <ul style="list-style-type: none"> <li>• Need to maintain ambition and exceeding targets to achieve zero emissions by 2050.</li> <li>• Commend DLRCC in driving action at local level to reduce greenhouse gas emissions and to improve our natural environment.</li> </ul>			No change to Draft Plan.
<p>iii) The County Development Plan should align with the DLRCC Climate Action Plan.</p>	<b><u>B0271</u></b>		<p>The Executive agrees with the issue raised. The purpose of Policy Objective CA4: Dún Laoghaire-Rathdown County Council Climate Change Action Plan 2020-2024 is to implement that plan.</p> <p>It is considered appropriate that this Policy Objective should be updated to reflect the new wording in the Climate Action and Low Carbon Development (Amendment) Bill 2021 requiring the Development Plan to take account of the DLR Climate Change Action Plan.</p> <p><b>Recommendation</b> Amend policy CA4 on page 55 from: <i>"Policy Objective CA4: Dún Laoghaire-Rathdown County Council Climate Change Action Plan 2019-2024 (DLR CCAP)</i> <i>It is a Policy Objective to implement the Dún Laoghaire Rathdown County Council Climate Change Action Plan 2019 - 2024 (DLR CCAP) and to transition to a climate resilient low carbon County. (Consistent with SO8 of the NPF, RPO 7.32, 7.33 of the RSES)."</i> to <i>"Policy Objective CA4: Dún Laoghaire-Rathdown County Council Climate Change Action Plan 2019-2024 (DLR CCAP)</i> <i>It is a Policy Objective to implement <u>and take account of</u> the Dún Laoghaire-Rathdown County Council Climate Change Action Plan 2019 - 2024 (DLR CCAP), <u>to take account of the 'Climate Action and Low Carbon Development (Amendment) Bill 2021', and subsequent updates of both</u> and to transition to a climate resilient low carbon County. (Consistent with SO8 of the NPF, RPO 7.32, 7.33 of the RSES)."</i></p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<p>iv) DLRCC should act in a Leadership and educational capacity on climate issues for the public and maybe introduce initiatives such as:</p> <ul style="list-style-type: none"> <li>• implementing energy audits in businesses,</li> <li>• support community energy projects.</li> <li>• partnering and collaborating on climate action initiatives,</li> <li>• implementing education strategies for the public</li> <li>• building innovative initiatives for local citizen engagement.</li> </ul>	<p><b><u>B0627</u></b> <b><u>B0807</u></b></p>		<p>The Executive notes the issue raised.</p> <p><b>This is not a Development Plan issue.</b></p> <p>DLR is actively engaging with staff and citizens about climate action from the benefits of renewables to providing tips on small steps that can be taken to reduce carbon. The Green Business Officer engages with businesses in the County. The Environmental Awareness Officer runs the Green Schools Programme. Home energy saving kits are available throughout DLR libraries to encourage citizens to be more energy aware. DLR have an <u>Environment and Climate Action Community Grant</u> which supports residents' associations, tidy district and tidy town groups who work to enhance and improve their local public areas and provide education on climate action measures locally.</p> <p>The Council is leading on the first Dublin Climate Action Week (#DCAW21), in September this year in partnership with the other Dublin Local Authorities, Codema (the Dublin Energy Agency) and the Dublin CARO (Climate Action Regional Office) to demonstrate the ongoing efforts, ambitions and the collaborative approach of the four Dublin Authorities to climate action.</p> <p>The Council also collaborates with Codema, the Dublin CARO, the SEAI and other agencies on a range of citizen engagement in the area of climate Action. More information on the role that the Council plays in this regard can be found on the Council website.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>v) Raise the issue of needing improved communications policy from the Dublin CARO office, Codema and the Env/Climate Change section of DLR with the public.</p>	<p><b><u>B1195</u></b></p>		<p>The Executive notes the issue raised.</p> <p><b>This is not a Development Plan issue.</b></p> <p>The Council carries out a range of outreach programmes on climate actions as set out in the previous response. In addition, in April 2021, two Climate Conversations Workshops as part of the public consultation, to inform the development of the National Climate Action Plan 2021 were held by the Public Participation Network (PPN). As previously set out DLR is leading on the first Dublin Climate Action Week (#DCAW21) in September this year this will showcase</p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
			<p>Dublin’s climate action progress to its citizens and demonstrate the leadership role of the four local authorities in conjunction with other partners.</p> <p>Codema, together with the four Dublin Local Authorities, is developing a collaborative Transition Roadmap for the Dublin Region, which will motivate citizens, local businesses, public authorities and transport groups to work together towards the same goal of developing Dublin as a sustainable, healthy, leading EU city by 2050. This roadmap will be developed as part of the H2020 'TOMORROW' project, in which Dublin is one of six pilot EU cities to develop a 2050 transition roadmap for a climate-neutral, liveable city and County.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>vi) Submission requests more emphasis on climate mitigation measures throughout the plan.</p>	<p><b>B0406</b></p>		<p>The Executive notes the issue raised but considers the issues are adequately addressed in the Plan. Climate mitigation relates to actions to limit climate change. There is considerable emphasis on climate mitigation measures in the Plan. One of the overarching Strategic County Outcomes as set out in Chapter 1 is the <i>Creation of a Climate Resilient County</i>. Underpinning this objective is the implementation of the NPF compact growth agenda at the local level and the integration of land-use and transportation which are actions that ultimately are about reducing emissions in the County through sustainable planning. Chapter 2 provides a detailed set of Policy Objectives relating to Climate mitigation and also sets out the all-encompassing emphasis on climate mitigation throughout the plan in Table 3.1 which is entitled <i>How Chapters contribute to Climate Change Adaptation Mitigation and Adaptation</i>. In addition to this it should be noted that there is a suite of climate mitigation measures set out in appendices to the Draft Plan including:</p> <p>Appendix 6 Waste Management Guidelines Appendix 7 Sustainable Drainage System Measures Appendix 15 Green Infrastructure Strategy Appendix 16 Strategic Flood Risk Assessment</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p><b>3.3.3.2: Energy Efficiency in buildings</b></p>			

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
<p>vii) Submission raises a range of alternatives in terms of how Energy efficiency in buildings should be addressed in policy in the Plan:</p> <ul style="list-style-type: none"> <li>• Current Plan has Passive House Standard as the energy performance standard. DLR was a leader in passive house.</li> <li>• Concerns that the Council is not leading by example in that it has not committed to Net Zero for Council buildings i.e. to a standard which exceeds NZEB in the Plan.</li> <li>• Recommend a wording to promote and support the Passive House standard as a path to achieving net zero emission buildings.</li> <li>• Recommends a new requirement for the Plan so that new buildings are designed to minimise energy consumption, ensure thermal comfort and minimise the risk of both overheating and condensation.</li> <li>• Propose new objectives for the ‘Whole Life Carbon’ approach to buildings and Home Performance Index (HPI) to assess the total carbon contribution of buildings- as an alternative to the Passive House Standard.</li> <li>• An alternative to adopting the Passive House Standard in the Development Plan could be incentivised through favourable development contributions.</li> <li>• Cautions against overly prescriptive development standards relating to climate action as technologies are evolving as new technologies, new construction methods and new materials are evolving.</li> <li>• The County could inform the next iteration of building regulations in line with the EU's Energy</li> </ul>	<p><b><u>B0848</u></b>  <b><u>B0891</u></b>  <b><u>B0996</u></b>  <b><u>B1088</u></b>  <b><u>B1116</u></b>  <b><u>B1127</u></b>  <b><u>B1131</u></b>  <b><u>B1206</u></b></p>		<p>The Executive notes the range of opinions raised with regards to the issue of building standards.</p> <p>Building standards are set by the building regulations and are governed by a different code to the Planning code. DoEHLG Section 28 Guidelines “Sustainable Residential Development In urban Areas” (2009) state in paragraph 4.11 that <i>“the construction sector should not have to contend with different standards set by individual planning authorities for the environmental performance of buildings”</i>.</p> <p>The advice of the DOHLGH as set out in the Section 28 <i>“Development Management Guidelines for Planning Authorities” (2007)</i> is to avoid attaching conditions relating to other codes in order to avoid duplication and confusion.</p> <p>The Draft states on page 58 that:  <i>“Energy and buildings are one of the key target areas of the DLR CCAP 2019 – 2024. A series of ambitious targets to be delivered by the DLR Energy team, SEAI and others are set out in the DLR CCAP. DLR’s social housing stock promotes high quality energy efficiency in new build and has a programme of energy upgrade supported by other stakeholders. The Development Plan can play a role in supporting and encouraging energy efficiency in the built environment.”</i></p> <p>Section 3.4.1 sets out a suite of Policy Objectives which support and encourage energy efficiency in the built environment:</p> <ul style="list-style-type: none"> <li>• Policy Objective CA5: Energy Performance in Buildings</li> <li>• Policy Objective CA6: Retrofit and Reuse of Buildings</li> <li>• Policy Objective CA7: Construction Materials</li> <li>• Policy Objective CA8: Sustainability in Adaptable Design</li> </ul> <p>Development in relation to energy efficiency have been evolving and will continue to evolve with the development of new technologies and the requirements of iterations of the EUs Energy Performance of Buildings Directives.</p> <p>Currently all new buildings must be designed to nZEB standard in accordance with Building Control legislation and this is supported by Regional Planning Objective 7.40.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<p>Performance of Buildings Directive, and the requirement for Member States to further reduce building energy consumption to hit the carbon emissions targets for 2030 and 2050.</p> <ul style="list-style-type: none"> <li>Embodied carbon and life cycle analysis needs to be included in County Development Plan. Mentioned in current County Development Plan was not adhered to. Needs to be strictly enforced.</li> </ul>			<p><b>Recommendation</b> No change to Draft Plan.</p>
<p>viii) Submissions:</p> <ul style="list-style-type: none"> <li>Considers that new standards should apply in Decarbonising Zones to ensure that they meet net zero carbon standards.</li> <li>Suggests reviewing best practice,</li> <li>Suggests target setting for all new developments to be zero carbon and having policies to reduce embodied carbon.</li> <li>Suggests new measures to trigger faster development when it meets both its housing delivery as well as wider climate objectives such as Decarbonization Zones.</li> </ul>	<b>B1088</b>		<p>The Executive notes the issues raised.</p> <p>It is noted that Section 8.7.1.12 (page 176) refers to the designation of decarbonising zones during the lifetime of the Plan</p> <p>Dún Laoghaire-Rathdown County Council's has submitted a response to Action 165 of the national 'Climate Action Plan 2019', which requires each local authority to identify and develop plans for a Decarbonising Zone.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.3.3.3: Retrofit and Reuse</b>			
<p>i) Planning policy needs to reflect the embodied carbon in existing building structures and fittings, to ensure that existing buildings are not needlessly demolished to be replaced by new buildings of equivalent spatial characteristics.</p>	<b>B0929</b> <b>B1195</b>		<p>The Executive agrees with the issue raised. It is considered that this issue is adequately dealt with in Policy Objective CA6: Retrofit and Reuse of Buildings which states:</p> <p><i>It is a Policy Objective to require the retrofitting and reuse of existing buildings rather than their demolition and reconstruction where possible recognising the embodied energy in existing buildings and thereby reducing the overall embodied energy in construction as set out in the Urban Design Manual (Department of Environment Heritage and Local Government, 2009). (Consistent with RPO 7.40 and 7.41 of the RSES).</i></p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
ii) Permission for demolition should include an assessment of the relative carbon emissions of demolishing and rebuilding vs retaining and upgrading (no net increase in cradle to grave CO2 emissions).	<b><u>B1131</u></b>		<p>No change to Draft Plan.</p> <p>The Executive notes the issue raised. It is considered that this issue is adequately addressed by Policy Objective CA6 which is set out in the response above. There is a need to take a balanced view with regard to demolition on the one hand and the requirement to increase the density of sites which are well serviced. Retrofit and reuse is required, where possible, but it is also recognised that existing buildings cannot always be reasonably incorporated into a new layout and to do so might result in a less than optimal use of the lands resource in term of achieving higher densities and compact growth which ultimately reduces carbon footprint.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
iii) Need to prioritise building and retrofitting of local authority houses as part of a just transition.  Reuse of building stock is very important and most sustainable.	<b><u>B1157</u></b> <b><u>B1195</u></b>		<p>The Executive notes the issue raised. <b>The operational issue of building and retrofitting local authority housing is addressed in the Council's Housing Construction and Maintenance Programmes.</b></p> <p>The Draft Plan states on page 58 that:  <i>"Energy and buildings are one of the key target areas of the DLR CCAP 2019 – 2024. A series of ambitious targets to be delivered by the DLR Energy team, SEAI and others are set out in the DLR CCAP. DLR's social housing stock promotes high quality energy efficiency in new build and has a programme of energy upgrade supported by other stakeholders. The Development Plan can play a role in supporting and encouraging energy efficiency in the built environment."</i></p> <p>The following information is considered relevant to demonstrate the Council's activity in retrofitting dwellings and other Council properties. In the past 10 years over 3500 homes have benefited from retrofit works.</p> <p>2021 is the first year of a new 10-year Energy Efficiency Retrofit Programme with DLR being allocated €1,114,467 t to retrofit a minimum of 41 properties to a B2/Cost Optimal standard.</p> <p>In relation to other Council owned buildings the DLR energy team and the DLR estates management unit maintain a register of opportunities for energy improvements for Council buildings and facilities in line with ISO 50001 and SEAI best practice. The Council uses an energy management database (Energy Elephant), which tracks energy usage &amp; bills</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<p>for our buildings across the County. The Council implements energy efficiency projects as opportunities for funding and resources allow.</p> <p>The DLR energy team and estates management unit are actively working on energy saving projects across the Council's estate, to improve the BERs across our portfolio of buildings. Where possible, grants from SEAI will be sought to reduce the Council's overall carbon footprint, in line with 2020 –2030 reduction commitments.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.3.4: Renewable Energy</b>			
<b>3.3.4.1: Policy Objective CA10: Renewable Energy</b>			
<p>i) Recommend that DLR ensures rapid phasing out of fossil fuels. This includes gas and fracked gas (as part of its energy mix). Advocate that data centres are powered on site with renewable energy and also utilising heat recovery.</p>	<p><b>B0807</b> <b>B1195</b></p>		<p>The Executive notes the issue raised. To ensure a rapid phasing out of fossil fuel is a national issue. The Draft Plan encourages the increased use of renewable energy sources.</p> <p>It should be noted that there are no significant data centres identified in the County. Policy Objective CA14: District Heating supports the utilisation of waste heat recovery and the development management approach to heat recovery is set out in Section 12.2.5 District Heating.</p> <p>In addition, as outlined in the DLR CCAP, the County is participating in the Dublin Region Energy Master Plan, which is examining local energy sources, separate to the preparation of the Draft Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) DLR should facilitate and encourage the micro generation of renewable energy and the exemption of development charges should be increased to 1 megawatt.</p>	<p><b>B0302</b></p>		<p>The Executive notes the issue raised.</p> <p>It is considered that micro-generation is encouraged through the suite of Policy Objectives in Section 3.4.2 of the Draft including:</p> <p>Policy Objective CA10: Renewable Energy Policy Policy Objective CA12: Small-Scale Wind Energy Schemes</p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
			<p>Policy Objective CA13: Solar Energy Infrastructure</p> <p>It is noted that many micro-generation renewable projects are exempted development as set out under the Planning and Development Regulation 2001, as amended. Section 12.2 sets out the development management approach to renewable energy which are not exempt is on a case by case basis.</p> <p>With regard to the issue of exemption of development charges this is part of a separate legal process of making of a development levy scheme under Section 48 of the Planning and Development Act, as amended.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) IFA supports the development of renewable energy initiatives and DLR should have a proactive approach. Recommends use of biomass as a green energy source from forest and other natural waste.</p>	<p><b>B0302</b></p>		<p>The Executive notes the issue raised.</p> <p>The Draft Plan supports “County, Regional, National and International initiatives and pilot scheme to encourage the development and use of renewable energy sources” as set out in Policy Objective CA10: Renewable Energy and has a suite of policies in this regard in Section 3.4.2 of the Draft.</p> <p>It is noted on page 60 that: <i>“DLR supports the increase in use of renewable energy resources, namely solar photovoltaic, geothermal, heat pumps, district heating, solar thermal, hydro, tidal power, offshore and small scale onshore wind.”</i></p> <p>As set out in the DLR CCAP, the County is participating in the Dublin Region Energy Master Plan which is in preparation by Codema. This Masterplan will create evidence-based, realistic, and costed pathways for the Dublin region to achieve its carbon emission reduction targets to 2030 and 2050. The scenario analyses will include all areas of energy use in the Dublin region, and will be evaluated based on the socio, economic and environmental impacts. The plan will focus on the areas where actions can be taken to introduce energy efficiency measures and reduce CO2 emissions, such as district energy systems and renewable energy technologies. Biomass is a low carbon resource which is supported in the all of Government ‘Climate Action</p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
			<p>Plan 2019’. Hence it is considered appropriate to amend the text in the Draft Plan to reflect this.</p> <p><b>Recommendation</b>            Change text in Section 3.4.2.1 on page 60 from:  <i>“DLR supports the increase in use of renewable energy resources, namely solar photovoltaic, geothermal, heat pumps, district heating, solar thermal, hydro, tidal power, offshore and small scale onshore wind.”</i></p> <p>to</p> <p><i>“DLR supports the increase in use of renewable energy <u>and low carbon resources</u>, namely solar photovoltaic, geothermal, heat pumps, district heating, solar thermal, hydro, tidal power, offshore wind <del>and</del>, small scale onshore wind and <u>biomass</u>.”</i></p>
<b>3.3.4.2: Onshore and Offshore Wind and Wave Energy</b>			
<p>i) A number of submissions welcome the support for reduction in GHG emissions and promotion of offshore renewables and requests retention of Policy Objective CA11 but request its expansion as set out below:</p> <ul style="list-style-type: none"> <li>To include the support for related onshore grid connections and reinforcements, consistent with RPO 10.24 of the Eastern and Midland Regional Spatial and Economic Strategy:</li> <li>Make reference to ‘Offshore Renewable Energy Development Plan’ Department of Communications, Energy and Natural Resources and any successor thereof (supported by RPO 10.24): Support the sustainable development of Ireland’s offshore renewable energy resources in accordance with any associated domestic and international grid connection enhancements.”</li> </ul>	<p><b><u>B0584</u></b>  <b><u>B0591</u></b>  <b><u>B0600</u></b>  <b><u>B0612</u></b>  <b><u>B0877</u></b>  <b><u>B1029</u></b>  <b><u>B1189</u></b></p>	<p>2 3 4 7 9 10 14</p>	<p>The issues raised are noted and the positive comments regarding are welcomed.</p> <p>It is considered appropriate to expand the policy to include reference to related onshore grid connections and reinforcements as these are necessary elements to supporting large scale projects.</p> <p>The last paragraph under Policy Objective CA11: Onshore and Offshore Wind Energy and Wave Energy (page 61) make reference to the ‘Offshore Renewable Energy Development Plan’ 2014 by the Department of Communications, Energy and Natural Resources. It is not considered necessary to refer to in the Policy Objective as well.</p> <p>It is not considered that it is appropriate to refer specifically to the sensitive coastal environments. Any planning application to be assessed by the planning authority will include an assessment of the environmental sensitives as appropriate to the particular nature of the application and this is reinforced in the wording of the Policy Objective CA11 in the use of “environmentally acceptable manner”. It should be noted that the jurisdiction of planning authorities for determining applications for offshore wind farms is limited and relates only to the landside infrastructure. The County Development Plan only relates to the jurisdiction of</p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
<ul style="list-style-type: none"> <li>Extend support to include energy storage systems and landside developments for offshore wind.</li> </ul> <p>Another submission considers that the policy should be expanded to be consistent with objectives relating to sensitive coastal environments and views and the issue is raised in the context of offshore wind farms</p>			<p>the County and does not cover infrastructure that falls outside that area which may be covered by the Maritime Plan.</p> <p>The Draft Plan support the National Marine Planning Framework as set out in Chapter 8 of the Draft Plan. The National Marine Planning Framework was published on 1<sup>st</sup> July 2021. Section 6.4.2.16 of this report is proposing updating the policy in this regard. It is also considered appropriate to suitably update Section 3.4.2.2 of the Draft Plan.</p> <p>It is noted that the National Marine Planning Framework recognises that visual impacts can be a concern and envisage statutory Guidelines on this matter.</p> <p><b>Recommendation</b> Amend Policy Objective CA11 on page 60 as follows</p> <p>from:</p> <p><b>3.4.2.2 Policy Objective CA11: Onshore and Offshore Wind Energy and Wave Energy</b> <i>It is a Policy Objective to support in conjunction with other relevant agencies, wind energy initiatives, both on-shore and offshore, and wave energy, when these are undertaken in an environmentally acceptable manner. (Consistent with NSO 8 and NPO 42 of the NPF and RPO 7.36 and 10.24 of the RSES)</i></p> <p>To</p> <p><b>Policy Objective CA11: Onshore and Offshore Wind Energy and Wave Energy</b> <i>It is a Policy Objective to support in conjunction with other relevant agencies, wind energy initiatives, both on-shore and offshore, and wave energy, <u>and onshore grid connections and reinforcements to facilitate offshore renewable energy development</u> when these are undertaken in an environmentally acceptable manner. (Consistent with NSO 8 and NPO 42 of the NPF and RPO 7.36 and 10.24 of the RSES).</i></p> <p>Add the following text at the end of the last paragraph of Section 3.4.2.2</p> <p><i>The Council supports the “National Marine Planning Framework” (2021, DHLGH). See also Section 8.5.1 Policy Objective GIB7: National Marine Planning Framework.</i></p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
<p>ii) Little reference in the Plan for windfarm development at sea. Some policies about marine planning should be included in the Plan, including that such developments are located outside a 22km Buffer Zone, as in many parts of Europe already.</p>	<p><b>B0591</b> <b>B0890</b></p>		<p>The Executive notes the issue raised and would not concur. Policy Objective CA11, which is set out in full in the response above addresses both Onshore and Offshore Wind Energy and Wave Energy. This issue is also considered below in Section 3.25: <i>Appendix 11 - Wind Energy Strategy</i> where changes are proposed to acknowledge that there is potential to develop the offshore wind resource where such facilities can be developed in an environmentally acceptable manner. It should be noted that the jurisdiction of planning authorities for determining applications for offshore wind farms is limited and relates only to the landside infrastructure. The County Development Plan only relates to the jurisdiction of the County and does not cover infrastructure that falls outside that area which will be covered by the Maritime Plan. See previous response regarding the National Marine Planning Framework.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p><b>3.3.4.3: Policy Objective CA13: Solar Energy Infrastructure</b></p>			
<p>i) Requests the inclusion of a specific policy as follows:</p> <p><i>“It is Council policy to promote the use of efficient energy storage systems and infrastructure that supports energy efficiency and reusable energy system optimization, in accordance with proper planning and sustainable development.”</i></p>	<p><b>B0877</b></p>		<p>The Executive agrees with the issue raised. The ability to store energy and optimise energy efficiency are important elements of supporting the development of the renewable energy resource of the County as a means of transitioning to low carbon climate resilient County.</p> <p><i>The Government’s national ‘Climate Action Plan 2019 To Tackle Climate Breakdown’ notes that “the renewables sector is very dynamic in nature, with technologies still rapidly evolving. Ensuring increased levels of renewable generation will require very substantial new infrastructure, including wind and solar farms, grid reinforcement, storage developments, and interconnection.”</i></p> <p><b>Recommendation</b> Amend Chapter 3 as follows;</p> <p>Add <b><i>Policy Objective CA14: Energy Storage Systems</i></b> <i>It is Policy Objective to support the use of efficient energy storage systems and infrastructure that supports energy efficiency and reusable energy system optimization, in accordance with proper planning and sustainable development when these are undertaken in an environmentally acceptable manner.</i></p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
			<p><i><u>The Government’s national ‘Climate Action Plan 2019 To Tackle Climate Breakdown’ notes that “Ensuring increased levels of renewable generation will require very substantial new infrastructure, including wind and solar farms, grid reinforcement, storage developments, and interconnection.” (page 53).</u></i></p> <p><i><u>Renumber Policy Objectives CA14- CA17</u></i></p>
<p>ii) Submission suggests a wording change to Policy Objective CA13: Solar Energy and refers to numerous examples of such from other Local Authorities. The suggested text refers to safeguarding the natural environment.</p> <p>Submission suggests insertion of one additional Policy Objective in in relation to:</p> <p>Make representations to the appropriate government department to make Planning Guidelines for ground mounted solar farms</p>	<p><b><u>B0594</u></b></p>		<p>The Executive notes the sentiments of the issues raised. Policy and development management guidance for solar is set out in: Policy Objective CA13 S.12.2.4 Solar</p> <p>It is considered that the wording CA13: Solar Energy is robust. This should be read in conjunction with Section .12.2.4 Solar (page 225) which set out what the Council will consider when assessing application for solar farms. The issuing of national policy guidelines is a matter for the relevant government Department and is not an appropriate Policy Objective.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Requests a policy on Compressed Natural Gas (CNG) infrastructure in Chapter 3 and suggests a wording.</p> <p>The DLR Spatial Energy Demand Analysis document highlights that there is rural land in the south of the County that is suitable for growing energy feedstocks; which can be made into renewable gas and hence could improve the security of energy supply and sources in the County.</p>	<p><b><u>B1031</u></b></p>		<p>The Executive notes the issue raised.</p> <p>The Draft Plan prioritises the support of renewable energy and the transition to a low carbon climate resilient County as set out in Policy Objective CA10: Renewable Energy.</p> <p>Policy Objective CA15: Low Emission Vehicles states <i>“It is a Policy Objective to support and facilitate the roll out of alternative low emission fuel infrastructure, through the Development Management Process, prioritising electric vehicle infrastructure.”</i></p> <p>Compressed Natural Gas (CNG) is an alternative fuel type. It can be both renewable and non-renewable. The Plan supports renewable energy and the transition to a low carbon climate resilient County. CA15 refers to “prioritising electric vehicle infrastructure”. In this regard is not considered appropriate to specifically support Compressed Natural Gas infrastructure. However, this is an evolving area there may be national guidance available in due course to give more clarity to the matter and the Council will be guided by this.</p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
			<p>In addition, as set out in the DLR CCAP, the County is participating in the Dublin Region Energy Master Plan which is in preparation by Codema. This Masterplan will create evidence-based, realistic, and costed pathways for the Dublin region to achieve its carbon emission reduction targets to 2030 and 2050. The scenario analyses will include all areas of energy use in the Dublin region, and will be evaluated based on the socio, economic and environmental impacts. The plan will focus on the areas where actions can be taken to introduce energy efficiency measures and reduce CO2 emissions, such as district energy systems and renewable energy technologies.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.3.4.4: Policy Objective CA14: District Heating</b>			
<p>i) The Assessment of Geothermal Resources for District Heating in Ireland and the Roadmap for a Policy and Regulatory framework for Geothermal Energy in Ireland documents have been developed to support the Government's commitments under the Climate Action Plan 2019 and the Programme for Government. These datasets would be of benefit to the objectives and policies in Chapter 3 Climate Action, Section 3.4.2 'Renewable Energy'.</p>	<b>B0249</b>		<p>The Executive notes and welcomes the contents of this submission.</p> <p>As outlined in Policy Objective CA14: District Heating, the Council will develop a district heating policy following on from the forthcoming National Policy Framework for District Heating. CA14 was drafted having regard to a strategic Direction received from an elected member at pre-draft stage which stated <i>“That the County Development Plan take cognizance of the National Policy to promote sustainable forms for heat generation”</i></p> <p>In addition, as outlined in the DLR CCAP, the County is participating in the Dublin Region Energy Master Plan in preparation by Codema (as outlined above). This masterplan is separate to the preparation of the Draft Plan. The geothermal resource is one of the local energy sources.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Has the Council liaised with the EU Commission and Parliament on this issue?</p>	<b>B0942</b>		<p>The Executive notes the contents of this submission. As outlined in Policy Objective CA14: District Heating, the Council will develop a district heating policy following on from the forthcoming National Policy Framework for District Heating. As part of the preparation of the Draft Plan the Executive has not liaised with the EU Commission and Parliament on this issue. In accordance with the national hierarchy of plans DLR will take the lead from National Policy which would be informed by European policy and potential liaison with the EU Commission</p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
			<p>and Parliament. The Council also receives advice from Codema and the Dublin CARO on these policy areas and it is noted that they participate in a wide range of EU projects.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.3.5: Decarbonising Motorised Transport</b>			
<p>i) Submission raise following issues relating to EV charging;</p> <ul style="list-style-type: none"> <li>• There is a need for the Council to roll out more EV charging.</li> <li>• Roadside charging policy/scheme is needed for houses without driveways.</li> <li>• Need to address those who live in apartments or have no off-street parking.</li> <li>• The Council should assist residents who wish to charge their cars in public street parking.</li> <li>• Specific mention is made of the need for EV charging in Stepside, Dún Laoghaire and Sandycove.</li> <li>• There is a need to consider more solar and electric power for transport infrastructure.</li> </ul>	<p><b><u>B0283</u></b> <b><u>B0753</u></b> <b><u>B0796</u></b> <b><u>B0839</u></b> <b><u>B0905</u></b> <b><u>B1003</u></b> <b><u>B1099</u></b></p>	<p>10 3 4</p>	<p>The Executive notes the issues raised.</p> <p>EVs are supported in the Draft Plan by the following Policy Objectives:</p> <ul style="list-style-type: none"> <li>• CA15: Low Emission Vehicles</li> <li>• CA16: Electric Vehicles</li> </ul> <p>The Draft Plan sets out on page 264 12.4.11 Electrically Operated Vehicles the development management standards for EVs in both apartment and houses along with standards for non-residential developments</p> <p>An update has been provided on the evolving issue of EV charging by the Public Lighting Section, Municipal Services Department.</p> <p>As most public charging units are utilized less than 50% of the time, and to enable the maximum number of users have access to them, DLR will be installing individual EV charging units in centralized locations. Examples include village centers or near local shops, where there are no existing publicly accessible units.</p> <p>The four Dublin Local Authorities are working to create a homogenous Electric Vehicle Charging Strategy for the Dublin region. The strategy is being finalised and thereafter will be made available to the members and the public, which should be in the coming months. Engagement is also taking place with other stakeholders, including the Department of Transport, on aligning with the national strategy on the roll-out of EV Charging Infrastructure, as well as examining appropriate project delivery and funding models for local authorities to play a role to ensure a fully interoperable and financially sustainable EV Charging Infrastructure is provided for the Dublin region.</p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
			<p>In the interim DLR intend to roll out a number of pilot schemes across the County over the coming months in village centers and employment centers which will be accessible 24hrs per day.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) There is no mention of cycling infrastructure or walking (active travel) in Chapter 3 although they are important in terms of the climate action response.</p>	<p><b><u>B0319</u></b> <b><u>B0406</u></b> <b><u>B0491</u></b> <b><u>B0749</u></b></p>	<p>N/A</p>	<p>The Executive notes and welcomes the issues raised.</p> <p>Section 3.4.3 recognises that transport account for 33.2 % of GHG emissions in the County. Figure 3.2 on page 62 shows that active modes have the lowest gCO2 per passenger Km and the text acknowledges that “Low Emission Vehicles (LEVs) and Electric Vehicles (EVs) are not the modes of transport with the lowest emission levels”. The EV Policy Objective refers to the provision of e-bike chargers.</p> <p>Section 3.4.3 also notes the Actions which are set out in the Councils Climate Action Plan including increasing the number of electric vehicles along with the promotion of active travel and behavioural change.</p> <p>This section is cross referenced with Chapter 5 where a holistic approach is taken to transport and the ‘avoid-shift-improve’ policy approach is adopted, which has the aim to reduce congestion, create more liveable cities and reduce greenhouse gas (GHG) emissions.</p> <p>In the interest of clarity, it is considered appropriate to expand the cross referencing piece regarding active travel in Chapter 3. In addition, the benefits of e-bikes at increasing the range of active travel trips will be mentioned.</p> <p><b>Recommendation</b> Insert the following text at the end of the last paragraph in section 3.4.3 (page 62):</p> <p><i><u>The ‘avoid-shift-improve’ policy approach is adopted in Chapter 5, which has the aim to reduce congestion, create more liveable cities and reduce greenhouse gas (GHG) emissions.</u></i></p> <p>Insert the following paragraph before Section 3.4.4 Urban Greening:</p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
			<p><i><u>“The growth of E-bikes is recognised as an important means of encouraging alternatives to the private car, increasing journey length by bike and reducing GHG emissions. E-bikes are also opening up cycling as a transport mode for the disabled, elderly and families. E-cargo bikes also have a role to play in reducing commercial vehicles in the County”</u></i></p>
<p><b>3.3.6: Urban Greening</b></p>			
<p>i) The submission welcomes the numerous urban greening measures provided for in the Draft Plan. As per the EU Biodiversity Strategy 2030 the Plan should provide for the immediate development of an Urban Greening Plan, as well as specific timeline and targeted policies for achieving the objectives of the Urban Greening Plan during the Development Plan period.</p>	<p><b><u>B0794</u></b></p>		<p>The Executive welcomes the praise of the urban greening measures outline in the Draft Plan.</p> <p>Policy Objective GIB20: Biodiversity Plan supports the forthcoming DLR County Biodiversity Action Plan which is in preparation. With regard to the EU Biodiversity Strategy 2030. The Draft Plan states on page 169 that <i>“The DLR County Biodiversity Action Plan has been written with the EU Biodiversity Strategy 2030, and the National Biodiversity Action Plan 2017-2021, in mind along with other plans and policies.”</i></p> <p>In addition to GIB20: Biodiversity Plan the Draft Plan sets out a suite of Policy Objective which provide urban greening measures including Policy Objective CA17: Urban Greening. Of particular note is Policy Objective GIB1: Green Infrastructure Strategy which sets out that is intended to continue to implement and update the Green Infrastructure Strategy. This update is planned during the lifetime of the 2022-2028 County Development Plan and will <i>“identify key green infrastructure aims with support from the forthcoming Wildlife Corridor Plan 2021”</i>.</p> <p>Also, of note is a revised Tree Strategy which is currently in preparation which updates the current Tree Strategy in terms of optimising the environmental, climatic and educational benefits derived from a holistic ‘urban forestry’ approach (supported in the Draft Plan by Policy Objective OSR7: Tree, woodlands and Forestry). Policy Objective OSR1: Open Space Strategy is a Policy Objective to prepare a review of the existing Open Space Strategy during the Lifetime of the plan.</p> <p>These policy documents and actions plans, along with the biodiversity friendly horticultural approach followed by DLR and the approach to the implementation of SuDS measures in planning applications as set out in Appendix 7 are consistent with the approach set out in the recommendation to prepare an Urban Greening Plan in the EU Biodiversity Strategy 2030.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
<p>ii) The ‘Green Factor Approach’ should be included in the Plan. The “Green Factor Method” or “Biotope Area Factor” (BAF) is an ecological planning tool which provides an opportunity to improve planning practices as it provides a means to assess and develop ways to build an ecological, climate-resistant and dense city in which the social values of urban greenery are a priority. The goal of the Green Factor Approach or BAF is to mitigate the effects of construction by maintaining sufficient levels of green infrastructure while enhancing the quality of the remaining vegetation.</p>	<p><b>B0886</b></p>		<p>The Executive welcomes and agrees with the sentiments of this submission.</p> <p>The approach to green infrastructure and nature based solutions is evolving in terms of both policy and practise. This can be seen in this plan by the introduction of both new policies, such as the CS8: Ecosystem Service Approach and the updating of other policies, such as the Appendix 7: Sustainable Drainage Systems Measures. This evolution will continue during the lifetime of the Plan for instance with the updating of the Green Infrastructure Strategy as set out in section 8.3.1 of the Draft Plan.</p> <p>The submission recommends that a Biotope Area Factor (BAF) or Green Factor Method is adopted into the Plan. The goal of the Green Factor Approach or BAF is to mitigate the effects of construction by maintaining sufficient levels of green infrastructure while enhancing the quality of the remaining vegetation.</p> <p>The Biotope Area Factor (Green Factor Method) = Scored Green Area divided by Area of Site. All green factor methods use the same calculation principle, however, the green elements, surfaces and structures included in the methods vary significantly, as do their weighted scores.</p> <p>The green elements relate to planted and maintained vegetation, various run-off water solutions, green roofs, permeable surfaces, etc. This type of approach is used in various cities such as Berlin, Seattle, Toronto, Malmö, Southampton and Helsinki and more recently in the Draft Greater London Area Plan (referred to as the urban greening factor).</p> <p>The objectives, practices and principles of the various green factor methods are developed to take into account the specific climate conditions, geographic characteristics, local planning conditions, and the functional values and perceptions of what constitutes an urban environment. In the green factor method, the planning authority can set a green factor target level for the site.</p> <p>The ‘Green Factor Approach’ can be considered to be an extension of the Sustainable Drainage Systems approach. This type of approach is compatible with the approach set out in <i>Policy Objective E16: Sustainable Drainage Systems</i> and <i>Appendix 7 Sustainable Drainage Systems</i> with the objective of minimising flows to the public drainage system and maximising local infiltration to them. There are also additional co-benefits consistent with the ecosystems</p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
			<p>services approach, urban greening and numerous Policy Objectives in Chapters 8, 9, 12, and Appendix 15: Green Infrastructure Strategy.</p> <p>It is considered appropriate during the Plan period to investigate developing a green factor method through a multi-disciplinary approach, subject to the availability of resources. Relevant data collection is feasible through an expansion of the Storm Water Audit process used for planning applications as set out in Appendix 7.</p> <p><b>Recommendation</b>                      Insert the following text following to the last paragraph on page to Section 3.4.4.1 (page 64).</p> <p><i><u>“The approach to green infrastructure and nature based solutions is evolving in terms of both policy and practise, one example of such is the use of Biotope Area Factor (BAF) or Green Factor Method. This type of approach is used in a number of cities such as Berlin, Seattle, Toronto, Malmö, Southampton and Helsinki and more recently in the Draft Greater London Area Plan (referred to as the urban greening factor). The goal of this approach is to mitigate the effects of construction by maintaining sufficient levels of green infrastructure while enhancing the quality of the remaining vegetation. This method provides a means to assess and develop ways to build an ecological, climate-resistant and dense city in which the social values of urban greening are a priority.</u></i></p> <p><i><u>The ‘Green Factor Approach’ can be considered to be an extension of the Sustainable Drainage Systems approach. This type of approach is compatible with the approach set out in Policy Objective E16: Sustainable Drainage Systems and Appendix 7 Sustainable Drainage Systems with the objective of minimising flows to the public drainage system and maximise local infiltration to them. There are additional co-benefits consistent with the ecosystems services approach urban greening and numerous Policy Objectives in Chapters 8, 9, 12, and Appendix 15: Green Infrastructure Strategy.</u></i></p> <p><i><u>It is considered appropriate during the plan period to investigate developing a green factor method through a multi-disciplinary approach, subject to the availability of resources. Data on surface cover types can be collected from the storm water audit process (see 7.1.5 Storm Water Audit Procedure Appendix 7: Sustainable Drainage Systems).</u></i></p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation																						
			<p>Insert the following text after the 4<sup>th</sup> paragraph on page 250 of Appendix 7: Sustainable Drainage Systems  <u><i>“All Stormwater Audits must include the following table completed by the scheme designers.</i></u></p> <table border="1" data-bbox="1055 405 2074 1374"> <thead> <tr> <th data-bbox="1055 405 1971 501"><u><i>Surface Cover Type</i></u></th> <th data-bbox="1971 405 2074 501"><u><i>Area (m<sup>2</sup>)</i></u></th> </tr> </thead> <tbody> <tr> <td data-bbox="1055 501 1971 592"><u><i>Wetland or open water (semi-natural; not chlorinated) maintained or established on site.</i></u></td> <td data-bbox="1971 501 2074 592"></td> </tr> <tr> <td data-bbox="1055 592 1971 683"><u><i>Semi-natural vegetation (e.g. hedgerows, trees, woodland, species-rich grassland) maintained or established on site.</i></u></td> <td data-bbox="1971 592 2074 683"></td> </tr> <tr> <td data-bbox="1055 683 1971 743"><u><i>Reuse of existing soils and seed source to develop vegetation cover</i></u></td> <td data-bbox="1971 683 2074 743"></td> </tr> <tr> <td data-bbox="1055 743 1971 873"><u><i>Standard trees planted in connected tree pits with a minimum soil volume equivalent to at least two thirds of the projected canopy area of the mature tree.</i></u></td> <td data-bbox="1971 743 2074 873"></td> </tr> <tr> <td data-bbox="1055 873 1971 963"><u><i>Standard trees planted in pits with soil volumes less than two thirds of the projected canopy area of the mature tree.</i></u></td> <td data-bbox="1971 873 2074 963"></td> </tr> <tr> <td data-bbox="1055 963 1971 1054"><u><i>Intensive green roof or vegetation over structure. Substrate minimum settled depth of 150mm.</i></u></td> <td data-bbox="1971 963 2074 1054"></td> </tr> <tr> <td data-bbox="1055 1054 1971 1184"><u><i>Non intensive Brown Roof (Biodiversity Roof). Substrate minimum settled depth of 150mm. Design will be site specific and developed by a suitably qualified ecologist.</i></u></td> <td data-bbox="1971 1054 2074 1184"></td> </tr> <tr> <td data-bbox="1055 1184 1971 1276"><u><i>Extensive green roof with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket)</i></u></td> <td data-bbox="1971 1184 2074 1276"></td> </tr> <tr> <td data-bbox="1055 1276 1971 1337"><u><i>Extensive green roof of sedum mat or other lightweight systems</i></u></td> <td data-bbox="1971 1276 2074 1337"></td> </tr> <tr> <td data-bbox="1055 1337 1971 1374"><u><i>Green wall –modular system or climbers rooted in soil.</i></u></td> <td data-bbox="1971 1337 2074 1374"></td> </tr> </tbody> </table>	<u><i>Surface Cover Type</i></u>	<u><i>Area (m<sup>2</sup>)</i></u>	<u><i>Wetland or open water (semi-natural; not chlorinated) maintained or established on site.</i></u>		<u><i>Semi-natural vegetation (e.g. hedgerows, trees, woodland, species-rich grassland) maintained or established on site.</i></u>		<u><i>Reuse of existing soils and seed source to develop vegetation cover</i></u>		<u><i>Standard trees planted in connected tree pits with a minimum soil volume equivalent to at least two thirds of the projected canopy area of the mature tree.</i></u>		<u><i>Standard trees planted in pits with soil volumes less than two thirds of the projected canopy area of the mature tree.</i></u>		<u><i>Intensive green roof or vegetation over structure. Substrate minimum settled depth of 150mm.</i></u>		<u><i>Non intensive Brown Roof (Biodiversity Roof). Substrate minimum settled depth of 150mm. Design will be site specific and developed by a suitably qualified ecologist.</i></u>		<u><i>Extensive green roof with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket)</i></u>		<u><i>Extensive green roof of sedum mat or other lightweight systems</i></u>		<u><i>Green wall –modular system or climbers rooted in soil.</i></u>	
<u><i>Surface Cover Type</i></u>	<u><i>Area (m<sup>2</sup>)</i></u>																								
<u><i>Wetland or open water (semi-natural; not chlorinated) maintained or established on site.</i></u>																									
<u><i>Semi-natural vegetation (e.g. hedgerows, trees, woodland, species-rich grassland) maintained or established on site.</i></u>																									
<u><i>Reuse of existing soils and seed source to develop vegetation cover</i></u>																									
<u><i>Standard trees planted in connected tree pits with a minimum soil volume equivalent to at least two thirds of the projected canopy area of the mature tree.</i></u>																									
<u><i>Standard trees planted in pits with soil volumes less than two thirds of the projected canopy area of the mature tree.</i></u>																									
<u><i>Intensive green roof or vegetation over structure. Substrate minimum settled depth of 150mm.</i></u>																									
<u><i>Non intensive Brown Roof (Biodiversity Roof). Substrate minimum settled depth of 150mm. Design will be site specific and developed by a suitably qualified ecologist.</i></u>																									
<u><i>Extensive green roof with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket)</i></u>																									
<u><i>Extensive green roof of sedum mat or other lightweight systems</i></u>																									
<u><i>Green wall –modular system or climbers rooted in soil.</i></u>																									

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
			<p><u><i>Rain gardens and other vegetated sustainable drainage elements.</i></u></p> <p><u><i>Flower-rich perennial planting.</i></u></p> <p><u><i>Hedges (line of mature shrubs one or two shrubs wide).</i></u></p> <p><u><i>Hedgerows or double hedgerow of native species (may have an associated ditch and bank)</i></u></p> <p><u><i>Groundcover planting.</i></u></p> <p><u><i>Amenity grassland entire area or sections managed for lesser mowing frequencies for pollinators e.g. six week meadow)</i></u></p> <p><u><i>Amenity grassland (species-poor, regularly mown lawn).</i></u></p> <p><u><i>Water features (chlorinated) or unplanted detention basins.</i></u></p> <p><u><i>Permeable paving.</i></u></p> <p><u><i>Sealed surfaces (e.g. concrete, asphalt, waterproofing, stone).</i></u></p> <p><u><i>Any assumptions (e.g. how expected tree canopy has been calculated) and which features (e.g. the type of semi-natural habitat) have been included should be noted. Maintenance and management of these systems should be carefully considered as this is an integral part of the process.) “</i></u></p> <p>Insert the following text after the second bullet point of Section 12.2.6 (p. 227):  <u><i>The Council is investigating developing a green factor method through a multi-disciplinary approach as set out in Section 3.4.4.1 Urban Greening. Data on all surface cover types is required. All applications that submit a stormwater audit shall submit the surface cover types as part of the storm water audit process (see 7.1.5 Storm Water Audit Procedure Appendix 7: Sustainable Drainage Systems).</i></u></p> <p>Insert the following text after the last paragraph of Section 12.8.6.2 (p. 285):</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<i>Further to Section 3.4.4.1 Urban Greening, data on all surface cover types shall be submitted to the Planning Authority as part of the storm water audit process (see 7.1.5 Storm Water Audit Procedure Appendix 7: Sustainable Drainage Systems).</i>
iii) Request Policy Objective CA17: Urban Greening is amended as follows:  <i>It is a Policy Objective to promote urban greening and invest significant public funds in a coherent town centre strategy for Dún Laoghaire Town Centre as a pilot case study linked to art policy. etc</i>	<b>B0876</b>	3	The Executive notes the issue raised but does not agree. The suggested amendment to a Policy Objective which has Countywide application would be overly focused on Dún Laoghaire. <b>Decisions on funding are not a County Development Plan issue.</b>  <b>Recommendation</b> No change to Draft Plan.
iv) With regard to meadows: <ul style="list-style-type: none"> <li>• Expansion of urban meadows is recommended in accordance with the All Ireland Pollinator Plan.</li> <li>• Council should allow estates to turn their green spaces into pollinator friendly meadows.</li> </ul>	<b>B1088</b> <b>B1205</b>		The Executive notes and welcomes the issues raised. It is considered that <i>Policy Objective CA17: Urban Greening</i> already comprehensively addresses this issue on page 64 of the Draft it sets out “that <i>The Council supports the expansion of urban meadows within the County, in accordance with the approach set out in the All Ireland Pollinator Plans.</i> ”  The second bullet point refers to a Parks and Landscape Services maintenance issue which is determined on a case by case basis in conjunction with local communities and is not a strategic County Development Plan issue. It is noted however that the Council operates pollinator friendly actions including ‘slow to mow’ practises and is developing a network of ‘Nature Wildlife Areas’ further details are available on the Council’s <a href="#">website</a> . This project aims to manage roadside verges and green spaces in a way that allows safe and accessible roadsides but also support pollinators. The aim is to alter mowing regimes and eliminate pesticide use. These areas can be used to create and enhance the ecological networks and wildlife corridors across the County by increasing connectivity and biodiversity.  <b>Recommendation</b> No change to Draft Plan.
v) The implementation of Policy Objective CA 17 Urban Greening will have direct beneficial impacts on biodiversity as well as resulting in positive effects on climate.	<b>B1247</b>		The Executive welcomes and agrees with the issue raised.  <b>Recommendation</b> No change to Draft Plan.
<b>3.3.7: Miscellaneous</b>			

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
<p>i) That clear definitions of “sustainability” and “sustainable growth” should be included in Chapter 3 as well as an acknowledgement that even ‘compact’ forms of development and improved transport infrastructure etc. may have undesirable impacts on the environment.</p>	<p><b>B0271</b></p>		<p>The Executive notes the issue raised.</p> <p>The term sustainable development has been in use for many years and is also used in the Planning Legislation. In accordance with Section 10(1) of the Planning and Development Act <i>“A development plans shall set out an overall strategy for the proper planning and sustainable development of the area of the area of the development plan...”</i></p> <p>It should also be noted that a number of the UN Sustainable Development Goals have influenced the 5 Strategic County Outcomes. The Draft Plan contains a new Policy objective UN1 – United Nations Sustainability Goals where it is set out that it <i>“is a Policy Objective of the Council to contribute, as practicable, via this Plan, towards achievement of the 17 Sustainable Development Goals of the United Nations’ 2030 Agenda for Sustainable Development”</i>.</p> <p>The Draft Plan is also consistent with objectives of the NPF and RSES and there is significant alignment between the NPF’s National Strategic Objectives and the United Nations Sustainable Development Goals. Where Policy Objectives in the Draft Plan support the achievement of a specific NSO or National Policy Objective (NPO), the relevant objective is referenced in brackets after the Policy Objective statement.</p> <p>The issue of sustainable growth is set out in the Core Strategy in Chapter 2 of the Draft Plan. It is not considered necessary to include such definitions in Chapter 3.</p> <p>In terms of environmental impact at the plan level the iterative SEA process examines all policies and objectives in the Plan and advises where amendments are required to ensure no significant impact on the environment.</p> <p>At the planning applications stage, through the Development Management process development which is not exempt is assessed by the Planning Authority to determine if it is appropriate having regard to the requirements of planning legislation. For all applications environmental impacts are also examined and EIAR screening must be carried out.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

### 3.4: Chapter 4 - Neighbourhood – People, Homes and Place

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<b>3.4.1: Introduction and National and Regional Context</b>			
<p>i) Welcome the strong commitment in the draft County Development Plan to the neighbourhood concept (PHP 4.1.1. Overarching Policy Objective PHP1. P67), but propose that this section is amended to include the term 'community building' as follows (proposed additional text underlined):</p> <p>That the opening sentence of the third bullet point under 4.1.1 be updated to state '<i>Embed the concepts of neighbourhood <u>and community building</u> into the spatial planning of the County</i>'...</p>	<b><u>B0271</u></b>		<p>The Executive notes and welcomes the support provided and the issue raised. It is considered that the term "community building" could create confusion as one may think of a physical building. It is however recommended that the word community be added.</p> <p><b>Recommendation</b> Amend bullet point 3 of Section 4.1.1 'Overarching Policy Objective PHP1' (p.67) from:</p> <p><i>"Embed the concepts of neighbourhood into the spatial planning of the County..."</i></p> <p>to:</p> <p><i>"Embed the concepts of neighbourhood <u>and community</u> into the spatial planning of the County..."</i></p>
<p>ii) Submissions supports the following Policy Objectives PHP2 -PHP5, PHP9, PHP12, PHP15, PHP25, PHP32 – PHP33, PHP35-PHP36, PHP38</p>	<b><u>B0942</u></b>		<p>The Executive notes and welcomes the support provided.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.4.2: Sustainable Communities and Neighbourhood Infrastructure</b>			
<p>ii) Planning policy needs to move away from a basic, one-dimensional zoning approach to the three dimensions of townscapes, streets, buildings and multi-use occupancy. In particular, housing policy needs to promote mixed housing forms, and move away from large-scale developments for highly-defined market segments.</p>	<b><u>B0929</u></b>		<p>The Executive notes the issue raised. Policy objectives of the Draft Plan are not simply 'one dimensional' or 'zonal', rather the Draft Plan contains a suite of Policy Objectives aimed at achieving the Strategic County Outcomes list in Chapter 1. of relevance in this instance are SCO's 3 and 4:</p> <ul style="list-style-type: none"> <li>• "Creation of a Network of Liveable Towns and Villages"</li> <li>• "Creation of an Inclusive and Healthy County"</li> </ul> <p>Of particular relevance with regard to the issue raised are Policy Objectives contained in Chapter 4 which support and facilitate:</p> <ul style="list-style-type: none"> <li>• The creation of sustainable communities, neighbourhoods and urban villages (PHP2, PHP3, PHP4).</li> </ul>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<ul style="list-style-type: none"> <li>The provision of a wide variety of housing types, sizes and tenures in existing and emerging residential areas (PHP25 – PHP33)</li> <li>The creation of healthy and attractive places in which to live (PHP34 – PHP39).</li> </ul> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submission requests that there is more reference to the Central Mental Hospital development by the LDA with specific reference to Sections 4.2.1.2 and 4.3.1.1, requesting that there is a balance between protecting existing residential amenities and the development of the site.</p>	<b>B0529</b>	1	<p>The Executive notes the issue raised and agrees that there is a need to balance any development with the protection of existing residential amenities. This requirement is set out in Policy Objective PHP18: 'Residential Density'.</p> <p>It is not, however, considered appropriate or necessary to refer to specific developments being progressed on particular sites in the County within Chapter 4.</p> <p>At present, the LDA are progressing two sites for development in the County – Shanganagh Castle and the Central Mental Hospital lands. In addition to the LDA, there are a number of other publicly owned sites being progressed, e.g. lands at Enniskerry Road. To reference only one development may be viewed as giving preference or priority to one site over another.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Request consideration of amendment to section 4.2.1 as follows: "Creating spaces that are easy to access, navigate and promote sustainable community and cultural activities".</p>	<b>B1095</b>		<p>The Executive agrees with the issue raised.</p> <p><b>Recommendation</b> Amend bullet point 10, Section 4.2.1 Sustainable Communities and Neighbourhood Infrastructure (p.69) from:</p> <p><i>"Creating spaces that are easy to access, navigate"</i> to: <i>"Creating spaces that are easy to access, navigate and that promote sustainable community and cultural activities"</i>.</p>
<b>3.4.2.1: Policy Objective PHP2: Sustainable Neighbourhood Infrastructure</b>			
<p>iv) A number of submissions welcome the new SNI zoning objective and commend the Council for this</p>	<b>B0152</b> <b>B0194</b>	1 7	<p>The Executive notes and welcomes the support provided and agrees with the sentiment of the issues raised.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>innovative approach in identifying ‘existing facilities and services considered to be central to sustaining and building neighbourhoods’ and welcomes the inclusion of community and parish centres. Submissions have raised issues with regard to the provision of appropriate sustainable neighbourhood infrastructure (SNI) and the loss of existing infrastructure due to development. Specific reference has been made to:</p> <ul style="list-style-type: none"> <li>• A need for planned SNI, respecting wildlife and the community of the Monaloe/Clonkeen areas</li> <li>• communities require buildings and centres for social, educational, recreational/leisure, cultural and civic needs of all the groups and ages of the County</li> <li>• Appropriate SNI provision at the Central Mental Hospital Lands.</li> <li>• Too much residential development on school sites – any further development would be a retrograde step and impact on school facilities / pitches.</li> <li>• Insufficient infrastructure to cope with continuing residential development in terms of a lack schools, shops, amenities &amp; recreational areas.</li> <li>• Future sites for Sustainable Neighbourhood Infrastructure should be identified.</li> <li>• The community strategy should be carried out in first year of the Plan.</li> <li>• The plan should prioritise and be more ambitious in terms of developing the community infrastructure required to enable compact growth.</li> </ul>	<p><b><u>B0195</u></b>  <b><u>B0208</u></b>  <b><u>B0288</u></b>  <b><u>B0345</u></b>  <b><u>B0394</u></b>  <b><u>B0414</u></b>  <b><u>B0417</u></b>  <b><u>B0529</u></b>  <b><u>B0543</u></b>  <b><u>B0773</u></b>  <b><u>B0870</u></b>  <b><u>B1047</u></b>  <b><u>B1132</u></b></p>		<p>The Draft Plan introduces a new land use zoning objective – SNI – <i>“To protect, improve and encourage the provision of sustainable neighbourhood infrastructure”</i>. This new land use zoning, Objective SNI, has been applied to:</p> <p>land parcels that contain existing SNI facilities together with its associated amenity / recreational space, e.g. schools, community facilities, places of worship and their associated parish / cultural centres, health care facilities.</p> <p>lands zoned objective ‘MH’ (Medical Hospital) in the current 2016-2022 plan have also been zoned Objective SNI.</p> <p>Lands with an extant planning permission for a new SNI facility – as in the case with lands in Ballyogan where a new school has been permitted.</p> <p>In addition to the land use zoning objective, specific local objectives (SLO) have been applied to existing SNI facilities located on sites within either existing mixed use zoning objectives in town centre locations e.g. Major Town Centres (MTC) where a range of uses are already permitted in principle, and on land use zoning objectives where there are more restrictive objectives and greater protection of existing facilities, e.g. on as lands zoned ‘F’.</p> <p>These specific local objectives are:</p> <ul style="list-style-type: none"> <li>• SLO 10 – which is applied to individual SNI facilities and states: <i>“To retain, improve and encourage the provision of sustainable neighbourhood infrastructure”</i></li> <li>• SLO 22 – which is outlined and is applied to a group/cluster of adjoining facilities or a larger land parcel continuing a SNI facility and states: <i>“To retain, improve and encourage the provision of sustainable neighbourhood infrastructure facilities within the outlined group of building / land.”</i></li> </ul> <p>The SNI land use zoning objectives seek to protect or improve existing SNI facilities / uses and identifies existing facilities. An aim of the SNI zoning objectives are to ensure that both existing and emerging residential areas are provided with and can continue to be served by an adequate level and an appropriate range of supporting social and community infrastructure.</p> <p>The SNI Land use zoning objective is supplemented by SNI specific Policy Objectives in Chapter 4 and Development Management guidance in Chapter 12:</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<ul style="list-style-type: none"> <li>• PHP2: Sustainable Neighbourhood Infrastructure</li> <li>• PHP3: Planning for Sustainable Communities</li> <li>• Section 12.3.2.1 ‘Development within Sustainable Neighbourhood Infrastructure Lands’</li> <li>• Section 12.3.2.2 ‘Sustainable Neighbourhood Infrastructure – Future Provision.</li> </ul> <p>Policy Objective PHP2 is aimed at protecting and improving existing sustainable neighbourhood infrastructure, such as schools, community facilities, healthcare facilities, places of worship etc, which are typically located within established residential neighbourhoods. These existing facilities often provide an important and multifaceted role within local communities. Through the land use zoning objectives and associated Policy Objective, these facilities and associated lands can continue to provide a community / social function and/or offer a recreational amenity within established neighbourhoods.</p> <p>Policy Objective PHP3 is aimed at ensuring that sufficient sustainable neighbourhood infrastructure is provided for new / emerging residential neighbourhoods where there is no or limited existing SNI facilities and/or SNI zoned lands. The provision of future sustainable neighbourhood infrastructure will be determined through both the Local Area Plan and development management process. With regard to the future provision of Schools, the Draft Plan, working in collaboration with the Department of Education, contains a number of ‘ED’ objectives identifying a ‘Future Education Site’.</p> <p>The SNI land use zoning may be expanded upon through future review of the County Development Plan as new SNI facilities are delivered.</p> <p>These Policy Objectives together with supporting development management guidance seek to ensure that existing and emerging communities have access to appropriate sustainable neighbourhood infrastructure and that existing facilities have the ability to evolve, expand and/or improve as required.</p> <p>In addition, a number of Policy Objectives in the Draft Plan seek to ensure that appropriate infrastructure will be provided to support increased residential development, including, but not limited to:</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<ul style="list-style-type: none"> <li>● Overarching Policy Objective PHP1 in Chapter 4 which states “That increased delivery of housing throughout the County will be subject to the Strategic Policy Objective to ... Embed the concept of neighbourhood into the spatial planning of the County by supporting and creating neighbourhoods and ensuring that residential development is delivered in tandem with the appropriate commensurate enabling infrastructure, including access to sustainable neighbourhood infrastructure, sustainable modes of transport, quality open space and recreation and employment opportunities.”</li> <li>● Policy Objective PHP4: ‘Villages and Neighbourhoods’ which promotes the 10-minute neighbourhood concept.</li> <li>● Policy Objectives PHP5 – PHP11 which support and facilitate the provision of facilities and services including childcare, education, health and community facilities.</li> <li>● Policy objective RET6: Neighbourhood Centres and RET7: Local Shops support and facilitate local and neighbourhood shops and services within communities and neighbourhoods.</li> <li>● Chapter 9 ‘Open Space, Parks and Recreation’ contains a suite of Policy Objectives aimed at ensuring the existing and future residents and users of the County have adequate access to a network of open spaces and recreational amenities.</li> </ul> <p>Policy Objective PHP2 states that ‘a more focused Community Strategy will be carried out during the lifetime of this Plan’. Policy Objective PHP5: Community Facilities supports the preparation of a Countywide Community Strategy. The timing and preparation of this strategy is an operational matter.</p> <p>It is considered that the Daft Plan contains an appropriate level of policy and guidance that will both safeguard existing and provide for additional infrastructure during the period, 2022-2028.</p> <p>In formulating this response, the Executive have in accordance with section 12 (8) (b) (iii) of the Planning and Development Act, 2000, (as amended) taken account of the strategic direction received from the members at pre-draft stage <i>“When developing policies for brownfield sites, the impact on existing environment, communities and the public realm should be taken into account.”</i></p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>v) Various submissions agree with Council’s view regarding the importance of providing new sustainable neighbourhood infrastructure, however, raise issues with regard to:</p> <ul style="list-style-type: none"> <li>• The application of SNI zoning on the entirety of a site as it will prevent the long-term growth of schools.</li> <li>• SNI zoning resulting in the restricting of development potential.</li> <li>• A lack of clarity in relation to suitable circumstances and commentary / Policy Objective in respect of residential development on ‘SNI’ zoned lands.</li> </ul>	<p><b>B0577</b> <b>B1011</b></p>	<p>10</p>	<p>No change to Draft Plan.</p> <p>The Executive notes and welcomes the support provided, however, disagrees with the issue raised in relation to the SNI zoning objective preventing the long-term growth of existing SNI facilities such as Schools and medical related uses.</p> <p>As set out in Table 13.1.7 (pg. 306), Chapter 13 of the Draft Plan, a number of uses are both permitted in principle and open for consideration under the land use zoning Objective SNI – <i>“To protect, improve and encourage the provision of sustainable neighbourhood infrastructure.”</i> Uses include ‘Education, Health Centre / Healthcare Facility, Hospital’ as being permitted in principle and ‘Residential’ being open for consideration.</p> <p>Educational and healthcare uses are considered to be an integral part of sustainable neighbourhood infrastructure. Policy Objective PHP2: Sustainable Neighbourhood Infrastructure, Chapter 4 in the Draft Plan seeks to protect and facilitate improvements to existing SNI facilities. In addition, Policy Objective PHP7: ‘Schools’ and PHP9: ‘Health Care Facilities’ in Chapter 4 of the Draft Plan supports the provision of school and health care facilities and the development / redevelopment of existing facilities.</p> <p>It is acknowledged that there will be sites in the County zoned objective ‘SNI’ that may be capable of accommodating other forms of development whilst still protecting existing SNI facilities and the recreational value of such sites in accordance with the land use zoning objective <i>“To protect, improve and encourage the provision of sustainable neighbourhood infrastructure”</i> and Policy Objective PHP2. All proposed development on lands zoned SNI will be subject to compliance with the requirements of Section 12.3.2.1 <i>‘Development within Sustainable Neighbourhood Infrastructure Lands.’</i></p> <p>It is not considered appropriate to identify SNI sites or parameters that render a site suitable for development, rather, this will be assessed through the development management process.</p> <p>It is noted that Submission B1011 refers to lands within the Sandyford Urban Framework Plan (SUIFP) area where there may be a limited or no existing recreational amenity associated with the SNI zoning objective and where other local objectives are contained within the SUIFP in Appendix 17 of the Draft Plan. In order to ensure that the objectives of the SUIFP are also</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>considered and to provide a level of flexibility to tighter urban sites, it is recommended that Section 12.3.2.1 is amended to reflect this.</p> <p>Any non-SNI related development within lands zoned Objective SNI should be justified in terms of the suitability of the site and how any such development would not impact upon the existing SNI use and/or function of the land parcel. In order to ensure that an applicant submits a justification for non-SNI development, and that existing SNI uses are adequately protected and/or improved, it is recommended that Section 12.3.2.1 in Chapter 12 is amended to reflect potential non-SNI development within suitable sites.</p> <p>In formulating this response, the Executive have in accordance with section 12 (8) (b) (iii) of the Planning and Development Act, 2000, (as amended) taken account of the strategic directions received from the members at pre-draft stage:</p> <ul style="list-style-type: none"> <li>• <i>“When developing policies for brownfield sites, the impact on existing environment, communities and the public realm should be taken into account.”</i></li> <li>• <i>“To request that the Chief Executive enhance the existing County Development Plan policies in regard to the protection of recreational and community spaces and infrastructure including areas currently with an INST objective”</i></li> </ul> <p><b>Recommendation</b>  Amend Section 12.3.2.1, Development within Sustainable Neighbourhood Infrastructure Lands, in Chapter 12 (p. 228) from:</p> <p><i>“Any proposed development on lands with a ‘Sustainable Neighbourhood Infrastructure’ (SNI) zoning objective or Specific Local Objective (SLO):</i></p> <ul style="list-style-type: none"> <li>• <i>Shall be required to identify the existing and permitted uses/structures within the zone and demonstrate how the proposed development will protect and/or improve existing facilities and services.</i></li> <li>• <i>Shall maintain the recreational value of the site by retaining a minimum of 20% usable open space in development proposals. This may not apply where an existing facility is located within a more urban, mixed use setting, as identified by SLO 10 and SLO 22.</i></li> </ul>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<ul style="list-style-type: none"> <li>• <i>Should incorporate measures to improve public use of the site and/or facilities as appropriate and seek to improve permeability through and linkages to adjoining lands.</i></li> <li>• <i>Shall be well designed having regard to the site context, landscape features, heritage within or adjoining the site.</i></li> <li>• <i>Should be compatible with or complement the existing facilities and services.</i></li> <li>• <i>Shall ensure that there is sufficient spatial capacity to accommodate the future needs of the existing and/or proposed SNI development. In this regard, a Masterplan may be required.</i></li> <li>• <i>Shall ensure that the amenities currently enjoyed by the existing use/structures are adequately protected in terms of noise, daylight / sunlight and, overlooking as appropriate.</i></li> <li>• <i>Should seek to share facilities as appropriate. Such facilities might include car parking, pitches, sports halls, etc.”</i></li> </ul> <p>To:</p> <p><i>“Sustainable neighbourhood infrastructure includes land or buildings that serve the needs of the local and wider community for social, educational, health, religious, recreational and leisure, cultural, and civic needs. These facilities and uses may be provided by public sector bodies, the community themselves or by the private sector. Facilities and uses include, but are not limited to – schools, third level education, places of worship, hospitals, health centres/GP’s, community centres, leisure centres, family resource centres, libraries, church/parish halls, meeting rooms, scout dens, men’s sheds, theatres and civic offices.</i></p> <p><i><u>All <del>any</del> proposed development on lands with a ‘Sustainable Neighbourhood Infrastructure’ (SNI) zoning objective or Specific Local Objective (SLO) 10 or 22:</u></i></p> <ul style="list-style-type: none"> <li>• <i>Shall be required to identify <u>all the existing and any permitted uses/structures within the overall SNI zoning objective lands of which the proposal is a part and demonstrate how the proposed development will protect and/or improve existing SNI facilities and uses services including their associated amenity / recreational facilities and uses.</u></i></li> <li>• <i><u>Without prejudice to the above, shall maintain the recreational value of the site overall SNI zoning objective lands of which the proposal is a part by retaining a</u></i></li> </ul>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><del>minimum of 20% or more usable open space in development proposals. This A derogation may not apply where an existing facility is located within a more urban, mixed use setting. Such facilities and uses will typically be as identified by SLO 10 and SLO 22.</del></p> <ul style="list-style-type: none"> <li>• <del>Should incorporate measures to improve public access and use of the lands site and/or facilities as appropriate and seek to improve permeability through and linkages to adjoining lands.</del></li> <li>• <del>Shall be well designed having regard to the site context, landscape features and any heritage within or adjoining the site.</del></li> <li>• <del>Should be compatible with or complement the existing SNI facilities and uses services.</del></li> <li>• <del>Shall ensure that there is sufficient spatial capacity to accommodate the future needs of the existing and/or proposed SNI development. In this regard, a Masterplan may be required.</del></li> <li>• <del>Shall ensure that the amenities currently enjoyed by the existing SNI use / facilities structures are adequately protected in terms of noise, daylight / sunlight and, overlooking as appropriate.</del></li> <li>• <del>Should seek to share facilities as appropriate. Such facilities might include car parking, pitches, sports halls, etc.</del></li> <li>• <del>Shall submit a detailed justification for any non-SNI uses (SNI uses are defined above) demonstrating how the proposed development will protect and/or enhance the existing SNI use and function of the overall SNI zoning objective lands of which the proposal is a part.</del></li> <li>• <del>All proposals within the Sandyford Urban Framework Plan area shall also refer to the objectives set out in Appendix 17 SUFP with respect to the SNI zoning (including section 2.3.6 of the SUFP).</del></li> </ul> <p><del>For the avoidance of any doubt, all development proposals shall demonstrate that there is sufficient spatial capacity to accommodate the future needs of the existing and/or any proposed SNI facilities within the overall SNI zoning objective lands of which the proposal is a part. In this regard, a Masterplan may be required.</del></p> <p><del>When assessing any proposal, the Planning Authority will consult with any relevant authority.”</del></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>Amend definition of Sustainable Neighbourhood Infrastructure in Glossary (p.354) from:</p> <p><i>“Sustainable neighbourhood infrastructure includes land or buildings that serve the needs of the local and wider community for social, educational, health, religious, recreational and leisure, cultural, and civic needs. These facilities and services may be provided by public sector bodies, the community themselves or by the private sector. Facilities and services include, but are not limited to – schools, third level education, places of worship, hospitals, health centres/GP’s, community centres, leisure centres, family resource centres, libraries, church/ parish halls, meeting rooms, scout dens, men’s sheds, theatres and civic offices.”</i></p> <p>To:</p> <p><i>“Sustainable neighbourhood infrastructure includes land or buildings that serve the needs of the local and wider community for social, educational, health, religious, recreational and leisure, cultural, and civic needs. These facilities and <u>uses services</u> may be provided by public sector bodies, the community themselves or by the private sector. Facilities and services include, but are not limited to – schools, third level education, places of worship, hospitals, health centres/GP’s, community centres, leisure centres, family resource centres, libraries, church/ parish halls, meeting rooms, scout dens, men’s sheds, theatres and civic offices.”</i></p>
<p>vi) Submissions welcome the 10-minute neighbourhood concept and 15-minute city model. With regard to promoting / achieving this, submissions:</p> <ul style="list-style-type: none"> <li>• Suggest that new homes have secure sheltered Sheffield or on-street bike bunkers outside each front door.</li> <li>• suggests that permeability is improved to encourage the concept.</li> <li>• Notes that the 10-minute neighbourhood will require pre-planned cycling infrastructure, age friendly public spaces and reduced speed limits</li> </ul>	<p><b><u>B0022</u></b>  <b><u>B0319</u></b>  <b><u>B0406</u></b>  <b><u>B1195</u></b></p>		<p>The Executive notes and welcomes the support provided.</p> <p>The Draft Plan contains a suite of Policy Objectives aimed at achieving the Strategy County Outcomes (SCO’s) listed in Chapter 1. It is envisaged that the 10-minute neighbourhood concept promoted in Policy Objective PHP4: ‘Villages and Neighbourhoods’ would assist in realising the SCO’s by creating sustainable neighbourhoods where residents are able to walk or cycle to facilities that serve their daily needs and/or be within a short walk of high quality public transport providing good access to a range of facilities and employment that may not be available locally.</p> <p>A 10-minute neighbourhood will evolve over a period of time through a number of mechanisms including (but not limited to) the development management process, improved walking and cycling infrastructure – including improved permeability, the local area plan</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>to 30 km/h for co-benefits of emission reductions and health.</p>			<p>process (where appropriate), public realm improvements and improvements to public transport.</p> <p>The Draft Plan contains various Policy Objectives and development management guidance with regard to healthy placemaking, walking and cycling infrastructure which would aid in improved permeability.</p> <p>Policy Objective PHP34: ‘Healthy Placemaking’ seeks to ensure that new development is of a high quality design with a focus on healthy placemaking and are cognisant of connectivity, and inclusivity. Creating healthy and attractive places to live through good urban design helps encourage walking and cycling.</p> <p>Modal change, i.e. a move from use of the private car to more sustainable transport options and active travel, such as walking and cycling, are promoted and facilitated in Chapter 5 of the Draft Plan. Policy Objective T10: ‘Walking and Cycling’ seeks to develop a <i>“high quality, fully connected and inclusive walking and cycling network across the County and the integration of walking, cycling and physical activity with placemaking including public realm improvements”</i>.</p> <p>Policy objective T11: ‘Footways and Pedestrian Routes’ seeks to maintain and expand the footway and pedestrian route network in the County through the development management process with improved pedestrian links.</p> <p>There is reference to improved permeability in Chapter 12 ‘Development Management’ including Sections:</p> <ul style="list-style-type: none"> <li>• 12.3.1.1 ‘Design Criteria’</li> <li>• 12.4.1 ‘Traffic Management and Road Safety’</li> <li>• 12. 8. 5. 2 ‘Accessibility, Permeability, Security and Privacy’</li> </ul> <p>Whilst Policy Objectivities T10 and T11 would improve permeability and aid in the evolution of the 10-minute neighbourhood concept, this is not explicitly referenced in either Policy Objective. It is this regard, it is recommended that Policy Objective T10 is amended to include reference to both permeability and the 10-minute neighbourhood concept.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>The provision of cycle parking in new developments is set out under Section 12.4.6 ‘Cycle Parking’ in Chapter 12.</p> <p><b>The setting of speed limits is through Bye laws and is a reserved function. In this regard there is an ongoing review of speed limits. This is not a County Development Plan issue.</b></p> <p><b>Recommendation</b> Amend Policy Objective T10 ‘Walking and Cycling’ (p.106) from:</p> <p><i>“It is a Policy Objective to secure the development of a high quality, fully connected and inclusive walking and cycling network across the County and the integration of walking, cycling and physical activity with placemaking including public realm improvements. (Consistent with NPO 27 and 64 of the NPF and RPO 5.2 of the RSES)”</i></p> <p>To:</p> <p><i>“It is a Policy Objective to secure the development of a high quality, fully connected and inclusive walking and cycling network across the County and the integration of walking, cycling and physical activity with placemaking including public realm and <u>permeability</u> improvements. (Consistent with NPO 27 and 64 of the NPF and RPO 5.2 of the RSES).”</i></p> <p>Amend paragraph 1 and 2 under Policy Objective T10 ‘Walking and Cycling’ (p.106) from:</p> <p><i>“A key aim of Smarter Travel is to ensure that walking and cycling become the mode of choice for local trips. The encouragement of walking and cycling (active mobility) is a climate change mitigation measure and important for promoting healthy communities and reducing obesity.</i></p> <p><i>Routes are being retrofitted to all key destinations and public transport hubs in the County. This retrofitting includes placemaking improvements such as cycle parking, urban greening and street furniture”.</i></p> <p>To:</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><i>“A key aim of Smarter Travel is to ensure that walking and cycling become the mode of choice for local trips. The encouragement of walking and cycling (active mobility): is a climate change mitigation measure important for promoting healthy communities and reducing obesity will aid in the evolution of the 10-minute neighbourhood concept.</i></p> <p><i>Routes are being retrofitted to all key destinations and public transport hubs in the County. This retrofitting includes permeability links, removal of barriers and placemaking improvements such as cycle parking, urban greening and street furniture”.</i></p> <p>Add the following text to the end of Policy Objective T10:</p> <p><i>“As part of the Development Management process, new development will be required to maximise permeability and connectivity for pedestrians and cyclists and where practicable, retrospective implementation of walking and cycling routes - to maximise permeability and connectivity - may also be required within existing neighbourhoods. (Refer also to Chapter 12 ‘Development Management, Sections, 12.3, 12.4 and 12.8).”</i></p>
<b>3.4.2.2: Policy Objective PHP4: Villages and Neighbourhoods</b>			
<p>i) Submission requests that villages, towns and communities are built, not just housing.</p>	<p><b><u>B0334</u></b></p>		<p>The Executive Agrees with the issue raised.</p> <p>The Draft Plan already contains a number of Policy Objectives aimed at ensuring that sustainable neighbourhoods, villages and towns are created throughout the County. Indeed, one of the five Strategic County Outcomes underpinning the entire plan as set out in Chapter 1 is the <i>Creation of a network of liveable towns and villages.</i></p> <p>Overarching Policy Objective PHP1 in Chapter 4 which states <i>“That increased delivery of housing throughout the County will be subject to the Strategic Policy Objective to ... Embed the concept of neighbourhood into the spatial planning of the County by supporting and creating neighbourhoods and ensuring that residential development is delivered in tandem with the appropriate commensurate enabling infrastructure, including access to sustainable neighbourhood infrastructure, sustainable modes of transport, quality open space and recreation and employment opportunities.”</i></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>Section 4.2.1 'Sustainable Communities and Neighbourhood Infrastructure' lists common features of exemplar sustainable communities and includes Policy Objectives:</p> <ul style="list-style-type: none"> <li>• PHP2: 'Sustainable Neighbourhood Infrastructure'</li> <li>• PHP3: 'Planning for Sustainable Communities', and</li> <li>• PHP4: 'Villages and Neighbourhoods'</li> </ul> <p>All of which are aimed at ensuring that appropriate social and community based infrastructure is protected, enhanced and provided for alongside and in tandem with residential development, and that residents can access most of their daily needs within a short distance of their homes.</p> <p>These Policy Objectives are supplemented by a number of Development Management criteria set out in Chapter 12.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submissions received with specific reference to Kiltiernan and Glenamuck:</p> <ul style="list-style-type: none"> <li>• Stating that a real village centre is needed that is in keeping with its surroundings and character.</li> <li>• The new village centre should contain a variety of shops and amenities, should have high standard of architectural merit and not be developer driven</li> <li>• Raising concerns in relation to town planning in Kiltiernan. States that there is a lack of infrastructure to serve new residential development and that outdoor amenities, history, wildlife and culture in the area needs to be protected. Recommends the area is kept green and sense of community maintained.</li> <li>• States that the rapid development of the Glenamuck Road and Carrickmines area</li> </ul>	<p><b><u>B0232</u></b> <b><u>B0726</u></b> <b><u>B0743</u></b> <b><u>B0761</u></b> <b><u>B0847</u></b> <b><u>B0985</u></b></p>	<p>9</p>	<p>The Executive agrees with the sentiment of the issue raised.</p> <p>Chapter 4 of the Draft Plan contains a suite of Policy Objectives aimed at:</p> <ul style="list-style-type: none"> <li>• creating attractive and sustainable communities and neighbourhoods (Section 4.2 'People'),</li> <li>• the delivery of new homes in an appropriate and sustainable manner having regard to existing amenities and the established character of areas (Section 4.3 'Homes') and</li> <li>• quality design and placemaking (Section 4.4 'Place').</li> </ul> <p>The development of Kiltiernan and Glenamuck will be guided at the local level by the Kiltiernan Local Area Plan (2013-2023). Section 4.0 'Residential Development' states: "<i>The overall vision for residential development in the LAP area is to ensure the development of a proper community through the considered use of imaginative and sympathetic design in the layout of new residential development</i>".</p> <p>This section of the LAP sets out a number of 'Built Form Objectives' and contains a section on 'Housing Design Issues'. Appendix A of the LAP contains the "Kiltiernan Neighbourhood Framework Plan" which guides the development and built form of the area.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>demonstrates little regard for maintaining the character of the area and is of huge concern. The architectural design of any future residential development(s) should be sensitive to the historical character of the area</p> <ul style="list-style-type: none"> <li>• Raises concerns regarding development in the Kiltiernan area and suggests that where development is permitted that strict control of planning is applied, and sanctions issued for any breaches.</li> </ul>			<p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submission seeks the provision of a sustainable urban village at Goatstown junction.</p>	<p><b>B0910</b></p>	<p>2</p>	<p>The Executive agrees with the sentiment of the issue raised. The Draft Plan already contains a number of Policy Objectives aimed at ensuring that sustainable neighbourhoods, villages and towns are created throughout the County.</p> <p>Overarching Policy Objective PHP1 in Chapter 4 which states <i>“That increased delivery of housing throughout the County will be subject to the Strategic Policy Objective to ... Embed the concept of neighbourhood into the spatial planning of the County by supporting and creating neighbourhoods and ensuring that residential development is delivered in tandem with the appropriate commensurate enabling infrastructure, including access to sustainable neighbourhood infrastructure, sustainable modes of transport, quality open space and recreation and employment opportunities.”</i></p> <p>Section 4.2.1 ‘Sustainable Communities and Neighbourhood Infrastructure’ lists common features of exemplar sustainable communities and includes Policy Objectives:</p> <ul style="list-style-type: none"> <li>• PHP2: ‘Sustainable Neighbourhood Infrastructure’</li> <li>• pHP3: ‘Planning for Sustainable Communities’, and</li> <li>• PHP4: ‘Villages and Neighbourhoods’</li> </ul> <p>All of which are aimed at ensuring that appropriate social and community based infrastructure is protected, enhanced and provided for alongside and in tandem with residential development, and that residents can access most of their daily needs within a short distance of their homes.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>These Policy Objectives are supplemented by a number of Development Management criteria set out in Chapter 12.</p> <p>The development of Goatstown will be guided at the local level by the Goatstown Local Area Plan (2012-2022). Section 3.4 ‘Neighbourhood Centres’ in the LAP specifically refers to the Goatstown crossroads as the principle neighbourhood centre with objective NC1 stating that <i>“new development located within neighbourhood centres shall incorporate a range of uses that contribute towards the creation of a sustainable community and a vibrant urban village.”</i></p> <p><b>Recommendation</b>  <a href="#">See section 3.2 for recommendation regarding inclusion of a new SLO for Goatstown.</a></p>
<p>iv) Submission highlights risks to the 10-minute neighbourhood concept stated within Policy Objectives elsewhere in Chapter 4 including:</p> <ul style="list-style-type: none"> <li>• ‘Prevent any new development or change of use which would seriously reduce the amenity of nearby dwellings.’ What if someone wants to open a bar or nightclub? What about the night time economy?</li> <li>• ‘Prevent the inappropriate change of use of existing residential properties to non-residential uses. Could this be used against someone trying to change the ground floor of a semi-d on an otherwise mundane suburban street into a vibrant local café?’</li> </ul>	<p><b><u>B1206</u></b></p>		<p>The Executive disagrees with the issue raised.</p> <p>The statements listed in the issue raised are bullet points from Policy Objective PHP19: ‘Existing Housing Stock – Adaptation’. This Policy Objective primarily relates to existing housing stock and existing established residential neighbourhoods, it does however, also supports living over the shop and the appropriate conversion of commercial property to residential use.</p> <p>Policy Objective PHP19 states <i>“In terms of protecting residential amenity, the zoning objectives for residential areas are framed so as to exclude non-compatible uses.”</i> Typically, established residential areas sit within land use zone objective ‘A’ – <i>“To provide residential development and/or protect and improve residential amenity.”</i> Tables 13.1.2 in Chapter 13 sets out uses that would be permitted in principle and open for consideration within zoning objective ‘A’.</p> <p>Night-time uses, such as night clubs and bars and cafes are not permitted in principle within this land use zone. Such uses would be more appropriately located within a mixed use zoning objective, such as:</p> <ul style="list-style-type: none"> <li>• ‘NC’ – ‘To protect, provide for and/or improve mixed-use neighbourhood centre facilities’,</li> <li>• ‘DC’ – ‘To protect, provide for and/or improve mixed-use district centre facilities’, or</li> <li>• ‘MTC’ – ‘To protect, provide for and/or improve major town centre facilities’</li> </ul>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>Mixed use zoning objectives adjoin, or in the case of zoning objective 'NC', can sit within established residential areas. It is the synergies between these mixed use areas and residential areas and improved linkages between them that the 10-minute neighbourhood concept will evolve around.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.4.2.3: Policy Objective PHP5: Community Facilities</b>			
<p>i) Support the inclusion of Phase 2 of the Samuel Beckett Civic Centre in the County Development Plan.</p>	<b>B0079</b>	9	<p>The Executive notes and welcomes the support provided.</p> <p>The Council is arranging a strategic review, including a Community Audit, in relation to the future development of the Samuel Beckett Campus Capital Project. This will include understanding the needs and demands of the local community. It is considered that SLO 77 on Map 9 should be amended to reference the review.</p> <p><b>Recommendation</b> Amend SLO 77, Map 9, Chapter 14 'Specific Local Objectives' (p. 326), from:</p> <p><i>"To provide for Phase 2 of the Samuel Beckett Civic Campus which includes a multi-purpose sports building, Sports Hall, Children's and 25 metre Swimming Pools, Dance Studio and Gym, a two-storey Library, a two storey Car Parking Facility and a hard landscaped Civic Plaza on Council lands at Ballyogan".</i></p> <p>To:</p> <p><i>"To provide for Phase 2 of the Samuel Beckett Civic Campus which includes a multi-purpose sports building, Sports Hall, Children's and 25 metre Swimming Pools, Dance Studio and Gym, a two-storey Library, a two storey Car Parking Facility and a hard landscaped Civic Plaza on Council lands at Ballyogan. <u>Provision shall be informed by the strategic review of the project</u>"</i></p>
<p>ii) Submission seeks a CPO for the "Blue House" site in Ballinteer (Between Broadford Rise, Our Lady's and Applegreen) to provide a community use such as a scout den.</p>	<b>B0334</b>	5	<p>The Executive notes the issue raised, however, <b>the Compulsory Purchase Order (CPO) of a site is not a County Development Plan issue</b>. Policy Objective PHP5: Community Facilities states: <i>"The Council will, during the lifetime of this Plan complete a Community Audit. This Audit will contain a Countywide review of existing facilities and indicate where gaps, if any exist."</i></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>There are currently no plans in place for the purchase of this plot of land. The Community Audit will provide an indication of where there are gaps, if any, in community facilities provision throughout the County and will provide an evidence based analysis to any shortcomings in service.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Request that PHP5 Community Facilities includes reference to arts and culture as a community facility. Forthcoming community audit should include arts and culture as a community asset.</p>	<p><b><u>B1095</u></b></p>		<p>The Executive notes and agrees that arts and culture is a community asset.</p> <p>Policy Objective PHP5 'Community Facilities' facilitates and supports the preparation of a Countywide Community Strategy. This strategy would be separate to the County Development Plan.</p> <p>PHP5 refers to a 'Community Audit' that would be completed during the lifetime of the plan. This audit would then "inform and guide the planning of future community, civic, and cultural facilities" across the County. The proposed audit would include both community and cultural spaces, facilities and resources to maximise the use of community, cultural and creative assets in the County. <b>The scope and completion of this audit is an operational rather than a County Development Plan matter.</b></p> <p>In addition to the future Community Strategy, Policy Objective PHP 10: 'Music, Arts and Cultural Facilities' in Chapter 4 of the Draft Plan facilitates "<i>the continued development of arts and cultural facilities throughout Dún Laoghaire-Rathdown in accordance with the County Arts Development Plan, 2016-2022 and any subsequent County Arts Development Policy.</i>"</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p><b>3.4.2.4: Policy Objective PHP6: Childcare Facilities</b></p>			
<p>i) Submissions raise issues with regard to childcare provision at a local level stating that:</p> <ul style="list-style-type: none"> <li>There is no childcare provision within walking distance of a home in Goatstown.</li> </ul>	<p><b><u>B0011</u></b> <b><u>B0942</u></b></p>	<p>1</p>	<p>The Executive notes and agrees with the sentiments of the issues raised.</p> <p>The provision of childcare in a specific location is a development management matter, however, the Draft Plan supports the development and delivery of accessible childcare facilities across the County.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<ul style="list-style-type: none"> <li>• a new civic, cultural and community centre in Dundrum can be an ideal location for the location of childcare services.</li> <li>• the Council should try to ensure large scale housing in Goatstown and Dundrum are followed by the provision of additional childcare facilities.</li> </ul>			<p>Policy Objective PHP6: ‘Childcare Facilities’, states that <i>“There continues to be a growth in demand for childcare services and the provision of good quality services close to local communities is important ... suitable locations for the provision of childcare facilities include residential areas, employment nodes, large educational establishments, major towns/district/neighbourhood centres and areas convenient to public transport networks”</i>.</p> <p>Large scale residential developments are required to adhere to Policy Objective PHP6 which states: <i>“In general, where a new residential development is proposed – with 75+ dwellings (or as otherwise required by the Planning Authority) – one childcare facility shall be provided on site in accordance with Sections 2.4, 3.3.1 and Appendix 2 of the ‘Childcare Facilities Guidelines for Planning Authorities’ (2001). The provision of childcare facilities within new, and indeed existing, residential areas shall have regard to the geographical distribution and capacity of established childcare facilities in the locale and the emerging demographic profile of the area.”</i></p> <p>The Draft Plan also promotes the provision of appropriate sustainable neighbourhood infrastructure and introduces a 10-min neighbourhood concept to assist in creating more sustainable local neighbourhoods and improved access to facilities such as childcare.</p> <p>At a more local level, Section 3.5.2 ‘Childcare’ in the Goatstown Local Area Plan (2012-2022) sets out the requirements for provision of new childcare facilities and states that <i>“the provision of adequate childcare facilities represents a crucial component of the social infrastructure”</i>.</p> <p><b>The function of a new civic, cultural and community centre in Dundrum is an operational rather than a development plan issue.</b> The forthcoming Local Area Plan for Dundrum is the most appropriate policy document for local childcare Policy Objectives.</p> <p>In formulating this response, the Executive have in accordance with section 12 (8) (b) (iii) of the Planning and Development Act, 2000, (as amended) taken account of the strategic direction received from the members at pre-draft stage <i>“That the Draft Plan addressed the needs of children and young people in its preparation”</i>.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
ii) Childcare should be planned around transport hubs such as Luas stops.	<b><u>B0011</u></b>		<p>No change to Draft Plan</p> <p>The Executive notes the issue raised.</p> <p>The Draft Plan supports the development and delivery of accessible childcare facilities across the County, including around transportation hubs.</p> <p>Policy Objective PHP6: Childcare Facilities (p.72) states that <i>“There continues to be a growth in demand for childcare services and the provision of good quality services close to local communities is important ... suitable locations for the provision of childcare facilities include residential areas, employment nodes, large educational establishments, major towns/district/neighbourhood centres and areas convenient to public transport networks”</i>.</p> <p>Section 12.3.2.4 Childcare Facilities (p.229) sets out specific development management guidance for proposed childcare facilities and states that the Planning Authority would ‘have regard to ... convenience to public transport nodes’ in their assessment of proposals.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
iii) Equity should be greater for community organisations in terms of some way of sharing insurance costs and also to facilitate community facilities in prominent locations.	<b><u>B0053</u></b>		<p><b>The Executive notes the issue raised, however this is not a Development Plan matter.</b> It is a matter for each organisation to ensure that it has the appropriate insurance in place for the activities which they run. DLR is not in a position to facilitate a sharing of insurance costs.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<b>3.4.2.5: Policy Objective PHP7: Schools</b>			
i) Submissions have raised concerns with regard to school provision in the Stepside / Ballyogan / Kiltiernan / Glenamuck area of the County. Concerns include: <ul style="list-style-type: none"> <li>• delay in the delivery of a permanent school building for Stepside Educate Together Secondary School.</li> </ul>	<b><u>B0079</u></b> <b><u>B0756</u></b> <b><u>B0761</u></b> <b><u>B0799</u></b> <b><u>B0847</u></b> <b><u>B0930</u></b> <b><u>B0985</u></b>	6 9	<p>The Executive notes the issues raised.</p> <p>The Core Strategy set out in Chapter 2 identifies Ballyogan and Environs and Kiltiernan-Glenamuck as ‘new residential community’ area with proposed residential yields of 4,147 and 2,015 respectively over the plan period. This growth in residential units will require appropriate supporting sustainable neighbourhood infrastructure, including new and/or improved school infrastructure.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<ul style="list-style-type: none"> <li>• additional schools, secondary in particular, may be required to serve the Kiltiernan / Glenamuck area to facilitate zoned residential land. (in relation to Kiltiernan LAP area)</li> <li>• school places is an existing issue in Kiltiernan and schools need to be able to cope with the extra demand.</li> <li>• Requests a review of whether additional secondary schools or extension to existing secondary schools are required in Sandyford/Stepaside area.</li> <li>• Kiltiernan Glenamuck needs more schools and better public transport provision.</li> </ul>			<p>The Draft Plan introduces a new land use zoning objective – SNI – <i>“To protect, improve and encourage the provision of sustainable neighbourhood infrastructure”</i>. This new land use zoning has been applied to existing schools and to lands at Ballyogan where planning permission for a new secondary school has been granted under Reg. Ref. D18A/1171.</p> <p>The land use zoning objective SNI identifies existing facilities and is primarily aimed at ensuring that both existing and emerging residential areas are provided with and can continue to be served by an adequate level and an appropriate range of supporting social and community infrastructure.</p> <p>Policy Objective PHP7: ‘Schools’ states: <i>“It is a Policy Objective to protect existing schools and their amenities and ensure the reservation of primary and post-primary school sites in line with the requirements of the relevant education authorities and to support the provision of school facilities and the development / redevelopment of existing schools for educational and other sustainable community infrastructure uses throughout the County.”</i></p> <p>DLR work closely with The Department of Education to identify sites for future schools across the County. While Policy Objective PHP7 supports the provision of schools and their facilities, the delivery of school infrastructure is a matter for the Department of Education.</p> <p>The anticipated growth and future need for schools in Stepside / Ballyogan / Kiltiernan / Glenamuck is acknowledged in the Draft Plan with the identification of future school sites. These future sites are illustrated on maps 6 and 9 by objective ‘ED’ <i>“Proposed Education Sites”</i>. The ‘ED’ objective provides flexibility in relation to the type of school that can be delivered, i.e. a primary or a post primary school.</p> <p>In addition to the school sites identified on land use maps, Policy Objective PHP7 states:</p> <p><i>“The Department of Education and Skills have also recognised that there may be a need for another school in the Kiltiernan/Glenamuck Local Area Plan area in addition to that indicated on Map no. 9.”</i></p> <p>In their submission to the Draft Plan, <b>B1066</b>, the Department of Education notes that various suburbs of the County <i>“bleed’</i> into one another with no clear or obvious boundaries</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>separating them into discrete entities”. The Department have referred to the site allocated in the Plan and would also consider that further school may be required as stated in the written statement. When the LAP is being reviewed the Department will give close consideration to whether a further post primary school is required in the area. The Department also refers to school provision to serve the Stepside and Ballyogan and Environs areas that includes the identification of 3no. future school sites within the area, all of which are identified on Draft Plan maps.</p> <p>Subsequent to the publication of the Draft Plan and the submission received from the Department of Education, it is noted that the Department of Education has published a ‘Statement of Strategy 2021-2023’. This Strategy includes three Strategic Goals for the period, including “Goal 3: Together with our partners, provide strategic leadership and support for the delivery of the right systems and infrastructure for the sector” with a ‘Strategic Action’ to “Support the delivery of an extensive school’s infrastructure programme, which incorporates best practice in climate action measures and ensures a place for all students.”</p> <p>It is considered that the Draft Plan acknowledges the need for additional school infrastructure and includes adequate support for the delivery of schools in the Kiltiernan / Glenamuck and indeed the wider Stepside / Ballyogan areas. In this regard there is no change required to the Draft Plan.</p> <p>It is noted, however, that since the publication of the Draft Plan, the Department of Education title has been updated. The Draft Plan refers to the Department of Education and Skills. It is considered that the Draft Plan should be updated to reflect the new Department title. (Note: Policy PHP7 correctly includes a reference to the ‘Department of Education and Science’ with regard to the publication ‘Code of Practice on the Provision of Schools and the Planning System’).</p> <p>In formulating this response, the Executive have in accordance with section 12 (8) (b) (iii) of the Planning and Development Act, 2000, (as amended) taken account of the strategic direction received from the members at pre-draft stage “That the Draft Plan addressed the needs of children and young people in its preparation”.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>Amend the Draft Plan to update all references of: <i>'Department of Education and Skills'</i></p> <p>To:</p> <p><i>'Department of Education'</i></p>
<p>ii) Submission notes that the children at Dún Laoghaire Educate Together National School have limited outdoor space and requests that the council facilitates the use of:</p> <ul style="list-style-type: none"> <li>• Dunedin park for some of their outdoor activities as soon as possible.</li> <li>• Develop the green space between Tivoli Terrace South and North for use by a number of schools.</li> <li>• Develop the green space within the Harbour for children.</li> </ul>	<p><b><u>B0381</u></b>  <b><u>B0779</u></b>  <b><u>B0804</u></b>  <b><u>B0808</u></b>  <b><u>B0809</u></b>  <b><u>B0817</u></b>  <b><u>B0821</u></b>  <b><u>B0825</u></b>  <b><u>B0830</u></b>  <b><u>B0842</u></b>  <b><u>B0845</u></b>  <b><u>B0852</u></b>  <b><u>B0860</u></b>  <b><u>B0864</u></b>  <b><u>B0867</u></b>  <b><u>B0879</u></b>  <b><u>B1085</u></b>  <b><u>B1097</u></b>  <b><u>B1109</u></b>  <b><u>B1130</u></b></p>	<p>3</p>	<p>The Executive notes the issues raised.</p> <p>Both Dunedin Park and the green space within the Harbour are publicly accessible areas of open space zoned objective 'F' – "To preserve and provide for open space with ancillary active recreational amenities". Each of these areas can be used by any member of the public, group or indeed school, they would not, however, be made available for the exclusive use of any particular group or activity.</p> <p>The lands at Tivoli Terrace South are also zoned objective 'F', however, these lands are in private ownership.</p> <p><b>The use of land for school activities is not a strategic County Development Plan matter, rather the use of the park land areas in question is operational.</b></p> <p><b>Recommendation</b>  No change to Draft Plan.</p>
<p>iii) Submission raises concern in relation to a lack of coordination between DLR and DES and seeks SLOs for school facilities, support and enhance the development of schools in Clonskeagh / Dundrum and Booterstown / Blackrock / Stillorgan areas. Reference is made to a number of specific school projects where temporary accommodation is in use and poor / no facilities are provided.</p>	<p><b><u>B0423</u></b></p>	<p>1 2 5</p>	<p>The Executive disagrees with the issue raised.</p> <p>It is not considered necessary to apply Specific Local Objectives to specific schools with regard to the improvement of facilities. The Draft Plan supports both the provision and improvement of schools through:</p> <ul style="list-style-type: none"> <li>• Policy Objective PHP7: 'Schools', which states:  <i>"It is a Policy Objective to protect existing schools and their amenities and ensure the reservation of primary and post-primary school sites in line with the requirements of the</i></li> </ul>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p><i>relevant education authorities and to support the provision of school facilities and the development / redevelopment of existing schools for educational and other sustainable community infrastructure uses throughout the County."</i></p> <ul style="list-style-type: none"> <li>• A new land use zoning – 'objective SNI' – "To protect, improve and encourage the provision of sustainable neighbourhood infrastructure" which has been applied to existing schools and is supplemented by Policy Objective PHP2: 'Sustainable Neighbourhood Infrastructure' which states: "<i>It is a Policy Objective to: Protect and improve existing sustainable neighbourhood infrastructure as appropriate."</i></li> </ul> <p>DLR work closely with The Department of Education to identify sites for future schools across the County. While Policy Objective PHP7 supports the provision and improvement of schools, the delivery of school infrastructure and the improvement of same is a matter for the Department of Education.</p> <p>The Draft Plan also identifies future school sites with the inclusion of objective 'ED' "Proposed Education Sites" on land use maps and includes sites in Goatstown, Blackrock and Dún Laoghaire.</p> <p>In formulating this response, the Executive have in accordance with section 12 (8) (b) (iii) of the Planning and Development Act, 2000, (as amended) taken account of the strategic direction received from the members at pre-draft stage "<i>That the Draft Plan addressed the needs of children and young people in its preparation"</i>.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>iv) Submission requests that Table 4.1 and Map 3 is amended as follows:</p> <ul style="list-style-type: none"> <li>• Omit objective ED from map 3 at the old Fire Station site and include instead an objective on map 3, AS for art studios as follows:</li> <li>• <i>The Old Fire Station site lends itself more suitably to Art and cultural uses including artist studio spaces, exhibition space and a sculpture garden and a food hall which would provide</i></li> </ul>	<b>B0876</b>	3	<p>The Executive disagrees with the issue raised.</p> <p>Policy Objective PHP7: 'Schools' states: "<i>It is a Policy Objective to protect existing schools and their amenities and ensure the reservation of primary and post-primary school sites in line with the requirements of the relevant education authorities and to support the provision of school facilities and the development / redevelopment of existing schools for educational and other sustainable community infrastructure uses throughout the County."</i></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p><i>much needed artist studio space and would regenerate the vibrancy of the area.</i></p>			<p>DLR work closely with The Department of Education to identify sites for future schools across the County with the lands at the old fire station in Dún Laoghaire being one such site identified for a new school. As such, this site contains the objective 'ED' "Proposed Education Sites".</p> <p>In their submission to the Draft Plan, <b>B1066</b>, the Department of Education have stated that all sites identified with an 'ED' symbol are required for school provision.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>v) Submission requests an amendment to Policy Objective PHP7: Schools to add at the start:</p> <p><i>"The design of all schools should be pandemic proofed by the provision of heat and ventilation systems, use of technology for the creation of a touch less antimicrobial environment and provision of adequate outdoor space for both class rooms and play areas as a critical defence against future disease outbreaks in the decades ahead".</i></p>	<b>B0938</b>	3	<p>The Executive notes the issue raised. Policy Objectives PHP2 and PHP7 will support design changes required to allow schools to adapt to changing circumstances and will protect existing outdoor amenity space associated with schools. Specific and/or technical design requirements for schools will, however, be a matter for the individual school or education authority to determine as the need arises.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>vi) Submission from the Department of Education:</p> <ul style="list-style-type: none"> <li>• Confirms that every school site depicted in the Draft Plan is required to meet projected educational needs.</li> <li>• Welcomes the inclusion of the ED symbols on sites including Newtownpark Avenue, George's Place and 2 sites in Sandyford.</li> <li>• Refers to a number of locations for future school sites including:</li> <li>• A new 8 school classroom primary school for the Woodbrook Shanganagh area. It is intended that this school would be expandable to 24 classrooms if required.</li> </ul>	<b>B1066</b>	3 6 9 10 14	<p>The Executive notes and welcomes the support provided by the Department of Education.</p> <p>DLR will continue to work closely with The Department of Education to identify suitable sites for future schools across the County and offer policy support for the delivery and improvement of existing schools. It is considered that the Local Area Plan process is an appropriate vehicle for the identification of school sites at a local level for the areas referred to within the submission.</p> <p>It is noted that since the publication of the Draft Plan, the Department of Education title has been updated. The Draft Plan refers to the Department of Education and Skills. It is considered that the Draft Plan should be updated to reflect the new Department title. (Note: Policy PHP7 correctly includes a reference to the 'Department of Education and Science' with regard to the publication 'Code of Practice on the Provision of Schools and the Planning System').</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> <li>The site allocated in the Plan for Kiltiernan-Glenamuck and would also consider that further school may be required as stated in the written statement. This would be given further consideration during a review of the LAP.</li> <li>Old Connaught where the department notes that a joint approach to the development of Bray has to be undertaken by WCC and DLRC. A site for a post primary school in Bray is currently being sought and whilst the search has been taking place in Bray the Department could give consideration to the potential suitability of land in old Connaught/Rathmichael where it is considered that the time to properly address the needs to zone future school sites for the area will be in the context of the future LAP.</li> </ul>			<p>In formulating this response, the Executive have in accordance with section 12 (8) (b) (iii) of the Planning and Development Act, 2000, (as amended) taken account of the strategic direction received from the members at pre-draft stage <i>"That the Draft Plan addressed the needs of children and young people in its preparation"</i>.</p> <p><b>Recommendation</b> Amend the Draft Plan to update all references of: <i>'Department of Education and Skills'</i></p> <p>To: <i>'Department of Education'</i></p>
vii) Submission raises a concern regarding the availability of schools, both primary and secondary, in the Dundrum area, particularly in view of future development at the Central Mental Hospital site.	<b>B1125</b>	1	<p>The Executive notes the issues raised.</p> <p>DLR works closely with The Department of Education to identify sites for future schools across the County. While Policy Objective PHP7 supports the provision of schools and their facilities, the delivery of school infrastructure is a matter for the Department of Education.</p> <p>The anticipated growth and future need for schools in the Dundrum / Goatstown area is acknowledged in the Draft Plan with the identification of a future school site on the former Irish Glass Bottles (IGB) site in Goatstown as indicated by objective 'ED' "Proposed Education Sites". This objective provides flexibility in relation to the type of school that can be delivered, i.e. a primary or a post primary school.</p> <p>In their submission to the Draft Plan, <b>B1066</b>, Department of Education notes that various suburbs of the County "'bleed' into one another with no clear or obvious boundaries separating them into discrete entities" The Department have referred to the site allocated in the Plan and would also consider that further school may be required as stated in the written statement. The submission from the Department notes that demand for school provision in</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>the Goatstown area is expected to grow from planning developments, including that at the Central Mental Hospital and that the IGB site is “considered to be excellent to meet educational demand in locational and accessibility terms.”</p> <p>Subsequent to the publication of the Draft Plan and the submission received from the Department of Education, it is noted that the Department of Education has published a ‘Statement of Strategy 2021-2023’. This Strategy includes three Strategic Goals for the period, including “Goal 3: Together with our partners, provide strategic leadership and support for the delivery of the right systems and infrastructure for the sector” with a ‘Strategic Action’ to “Support the delivery of an extensive school’s infrastructure programme, which incorporates best practice in climate action measures and ensures a place for all students.”</p> <p>It is considered that the Draft Plan acknowledges the need for additional school infrastructure and includes adequate support for the delivery of schools in the in the wider Goatstown area.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.4.2.6: Policy Objective PHP9: Health Care Facilities</b>			
<p>i) Submission received from the HSE with regard to St. Columcille’s hospital requests that the Draft Plan continues to support and protect the existing level of services through the inclusion of appropriate policies and objectives and recommend that policy SIC 10 in the existing plan be retained and includes specific reference to the hospital noting the importance of the facility to the community.</p>	<b>B0436</b>	10	<p>The Executive notes the issue raised.</p> <p>Policy SIC10 in the current, 2016 County Development Plan has been largely retained and updated, where required, as Policy Objective PHP9: ‘Health Care Facilities’, in the Draft Plan. Policy Objective PHP9 includes a specific reference to St. Colmcille’s Hospital.</p> <p>The zoning objective for lands where hospitals are located has altered from the current plan where they are subject to land use zoning objective ‘MH’ – “To improve, encourage and facilitate the provision and expansion of medical hospital uses and services”, to the new zoning objective ‘SNI’ – “To protect, improve and encourage the provision of sustainable neighbourhood infrastructure”. This new land use zoning identifies existing social and community based infrastructure within existing communities and aims to protect and/or improve existing facilities and uses. It is noted that this new zoning incorporates many than just health care related uses. In this regard, it is recommended that the importance of healthcare within existing communities is further highlighted within Policy Objective PHP9.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>In addition, it is noted that existing medical/hospital uses are supported at other hospital sites through the application of a specific local objective (SLO), including at St Michaels Dún Laoghaire (SLO 32) and for the two hospital campuses in the Sandyford Urban Framework Plan area – the Beacon and Leopardstown Park. There have been requests in submissions for similar SLOs for other hospitals including the St John of God Hospital and the National Rehabilitation Hospital (NRH). It is therefore recommended that a similar SLO to those already in place are applied to St Colmcille’s Hospital, St John of Gods, Mount Carmel Community Hospital and Blackrock Clinic. (refer to Section 3.14, Chapter 14 Specific Local Objectives, of this report for details in relation to the NRH).</p> <p><b>Recommendation</b>  Amend the last paragraph of Policy Objective PHP9: ‘Health Care Facilities’ (p.76) from:</p> <p><i>“The provision of both public and private healthcare facilities, together with community support services, will be encouraged on suitably zoned lands, including lands zoned Objective ‘SNI’, that are accessible to new and existing residential areas and that benefit communities by providing multi-disciplinary health care, mental health and wellbeing services in easily accessible locations throughout the County”.</i></p> <p>To:</p> <p><i>“<u>Health Care plays an important role within existing communities. The retention and/or improvement of these facilities will be supported throughout the County. The provision of both public and private healthcare facilities, together with community support services, will be encouraged on suitably zoned lands, including lands zoned Objective ‘SNI’, that are accessible to new and existing residential areas and that benefit communities by providing multi-disciplinary health care, mental health and wellbeing services in easily accessible locations throughout the County”.</u></i></p> <p>Amend maps and Chapter 13 (p.320, 324, &amp; 327) as follows:</p> <p>Add a new SLO to Maps 1, 2 and 6 as follows:</p> <p>Map 1 at Mount Carmel Community Hospital:</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p><i>"To support the retention of the existing medical/hospital uses at the Mount Carmel Community Hospital and facilitate its future development including the provision of supporting facilities"</i></p> <p>Map 2 at Blackrock Clinic: <i>"To support the retention of the existing medical/hospital uses at the Blackrock Clinic and facilitate its future development including the provision of supporting facilities"</i></p> <p>Map 6 at St. John of God Hospital: <i>"To support the retention of the existing medical/hospital uses at the St John of God Hospital on Stillorgan Road and facilitate its future development including the provision of supporting facilities"</i></p> <p>Map 10 at St Colmcille's Hospital: <i>"To support the retention of the existing medical/hospital uses at St Columcille's Hospital, Loughlinstown and facilitate its future development including the provision of supporting facilities"</i></p>
<p>ii) Submission requests that the Draft Plan recognises the specific and unique care provided at Leopardstown Park Hospital ensuring that the needs of the hospital are not inhibited in the plan. LPH requests direct policy and guidance support to ensure the enhanced healthcare facilities required under the National Quality Standards for Residential Care Settings for Older People in Ireland, 2016 and future improvements, can be delivered</p>	<b>B1004</b>	6	<p>The Executive notes the issue raised.</p> <p>Policy SIC10 in the current, 2016 County Development Plan has been largely retained and updated, where required, as Policy Objective PHP9: 'Health Care Facilities', in the Draft Plan. Policy Objective PHP9 includes a specific reference to several hospitals within the County, however, it does not list all facilities. It is therefore considered that all existing hospitals, including Leopardstown Park Hospital, are listed within the Policy Objective.</p> <p>The Policy Objective does not refer to the specific, and often specialised care, provided at each hospital within the County nor does it list all standards that health care facilities are required to adhere. The aim of Policy Objective PHP9 is to ensure that adequate and appropriate health care is provided to serve the County, standards of care within these facilities is a matter for health regulatory bodies and not the County Development Plan.</p> <p>It is noted that the Policy Objective wording does not explicitly refer to the 'improvement' of existing facilities which would help support the continued operation of all existing health care</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>facilities. In this regard it is considered appropriate to amend the wording of the Policy Objective.</p> <p><b>Recommendation</b>  Amend the first bullet point of Policy Objective PHP9: Health Care Facilities (p.75) from:</p> <p><i>“Support the Health Service Executive and other statutory and voluntary agencies in the provision of appropriate healthcare facilities - including the system of hospital care and the provision of community-based primary care facilities, mental health and wellbeing facilities.”</i></p> <p>To:</p> <p><i>“Support the Health Service Executive and other statutory and voluntary agencies in the provision <u>and/or improvement</u> of appropriate healthcare facilities - including the system of hospital care and the provision of community-based primary care facilities, mental health and wellbeing facilities.”</i></p> <p>Amend the first paragraph of Policy Objective PHP9: Health Care Facilities (p.76) from:</p> <p><i>“Provision of public health care services for DLR is the responsibility of the Health Service Executive (HSE). At present there are two public hospitals in DLR – St. Michaels in Dún Laoghaire and St. Columcille’s in Loughlinstown. In addition, the National Rehabilitation Centre and a number of privately operated hospitals, including Blackrock Clinic and Beacon Hospital, are also located in the County. There are also nine public health centres and a number of nursing homes and residential and day care facilities distributed throughout the County.”</i></p> <p>To:</p> <p><i>“Provision of public health care services for DLR is the responsibility of the Health Service Executive (HSE). At present there are <u>eight two</u> public and private hospitals in DLR:</i></p> <ul style="list-style-type: none"> <li><i>• St. Michaels <u>Hospital</u> in <del>Dún Laoghaire</del></i></li> <li><i>• St. Columcille’s <u>Hospital</u> in <del>Loughlinstown</del></i></li> <li><i>• <del>In addition, the National Rehabilitation Hospital Centre</del></i></li> <li><i>• St John of God Hospital</i></li> </ul>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<ul style="list-style-type: none"> <li>• <i>Leopardstown Park Hospital</i></li> <li>• <i>Mount Carmel Community Hospital</i></li> <li>• <i>and a number of privately operated hospitals, including Blackrock Clinic</i></li> <li>• <i>and Beacon Hospital are also located in the County.</i></li> </ul> <p><i>There are also nine public health centres and a number of nursing homes / convalescent care facilities and residential and day care facilities distributed throughout the County”</i></p>
<b>3.4.2.7: Policy Objective PHP10: Music, Arts and Cultural Facilities</b>			
<p>i) Submission from the Arts Council requests that the plan includes strategic policies on preservation and enhancement of the arts and culture taking into account, quality, quantity and demand for the formal arts and culture services infrastructure, and, informal spaces which can function as community asset. In this regard, it is requested that the following are taken into account:</p> <ul style="list-style-type: none"> <li>• Acknowledgement of the Dún Laoghaire-Rathdown Culture &amp; Creativity Strategy 2018-2022 in the Plan</li> <li>• Strategic and policy approach for Arts and Culture which have been/are identified of value in contributing toward physical, social and economic benefit for the County.</li> <li>• Future arts and cultural requirements are informed by an evidence based local needs assessments Baseline data could be used to generate a database of arts and cultural assets which in turn informs locational decisions and future needs.</li> <li>• Request that the Plan contain a Public Art and Architecture Strategy.</li> <li>• Submission request that provision of an Arts building where organised art based/craft</li> </ul>	<p><b>B1095</b> <b>B0780</b></p>		<p>The Executive notes the issues raised.</p> <p>Policy Objective PHP10: ‘Music, Arts and Cultural Facilities’ states: “It is a Policy Objective to:</p> <ul style="list-style-type: none"> <li>• <i>Facilitate the continued development of arts and cultural facilities throughout Dún Laoghaire-Rathdown in accordance with the County Arts Development Plan, 2016- 2022 and any subsequent County Arts Development Policy.</i></li> <li>• <i>Facilitate the implementation of the DLR Cultural and Creativity Strategy 2018-2022”.</i></li> </ul> <p>It is therefore noted that the Policy Objectives already acknowledges the Culture and Creativity Strategy 2018–2022. A typo in the reference will, however, be amended. It is considered reasonable to amend Policy Objective PHP10 to encourage the preservation, enhancement and provision of Arts and Culture identified as being of value in terms of contributing towards physical, social and economic benefit for the County.</p> <p>Policy Objective PHP10 also includes reference to the Council’s Public Art Policy, 2018 – 2025 and requirements with regard to public art in developments is set out in Section 12.6.8.8 ‘Public Art – Private Developer initiated Commissions’. The Council have no plans to develop an Architecture Strategy and the amended wording suggested by the Arts Council assumes that Public Art has a physical location. It is therefore not recommended to amend section 12.6.8.8.</p> <p>The issues raised with regard to future arts and cultural requirements are broadly addressed through the Councils arts development consultation process. It is therefore not necessary to include this in the Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
classes are held should be considered by the Council.			<p>A community audit referred to in Policy Objective PHP5: Community facilities would include both community and cultural spaces, facilities and resources to maximise the use of community, cultural and creative assets in the County.</p> <p><b>Provision of an arts building for the holding of organised art based/craft classes is beyond the remit of the County Development Plan.</b></p> <p><b>Recommendation</b> Amend second bullet point of Policy Objective PHP10: 'Music, Arts and Cultural Facilities' (p.76) from:</p> <ul style="list-style-type: none"> <li>• "Facilitate the implementation of the DLR Cultural and Creativity Strategy 2018-2022".</li> </ul> <p>To:</p> <ul style="list-style-type: none"> <li>• "Facilitate the implementation of the DLR <del>Culture</del> and Creativity Strategy 2018-2022".</li> </ul> <p>Amend paragraph 2 of PHP10 (p.76) to include the following text after the sentence ending "...development and investment."  <i>"The Council will encourage the preservation, enhancement and provision of Arts and Culture identified as being of value in terms of contributing towards physical, social and economic benefit for the County."</i></p>
<b>3.4.2.8: Policy Objective PHP11: Libraries</b>			
i) Submission states that a library is needed in the Ballyogan / Stepside area.	<b>B0334</b>		<p>The Executive notes issue raised.</p> <p>The Council is arranging a strategic review, including a Community Audit, in relation to the future development of the Samuel Beckett Campus Capital Project. This will include understanding the needs and demands of the local community.</p> <p><b>Recommendation</b> No change to Draft Plan. (See recommendation above relating to SLO 77.</p>
ii) Submission notes interest in plans for Dundrum and Stillorgan libraries and provision of service in Stillorgan during development at St. Laurence's Park.	<b>B0942</b>	1 2	<p>The Executive notes the issue raised. A Part 8 proposal for a new public library and housing was approved by the Elected Member in December 2020. A tender is currently being prepared for this scheme and work has begun to provide a temporary library service for Stillorgan during development of St Laurence's Park.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>Maintenance and conservation works have been undertaken at Dundrum library. Proposed new amenity in Dundrum will look at community and cultural needs.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.4.3: Inclusion and Participation</b>			
<b>3.4.3.1: Policy Objective PHP13: Social Inclusion and Participation</b>			
<p>i) Submission requests that people with disabilities should have opportunity to inform development with a similar approach for Travellers, including those with disabilities.</p>	<b>B0334</b>		<p>The Executive notes and agrees with the sentiment of the issue raised.</p> <p>The Council, through its Social Inclusion Unit and considered policies in relation to housing (including social housing, homeless accommodation and refuge facilities), community facilities, childcare, public transport, employment opportunities and accessibility, will encourage and proactively promote an ethos of social inclusion and participation.</p> <p>Chapter 4 of the Draft Plan contains a suite of Policy Objectives aimed at creating and improving inclusive, healthy neighbourhoods / communities through promoting the retention and provision of appropriate sustainable neighbourhood infrastructure, provision of a range of housing typologies – including housing for all residents of the County, and the creation of inclusive and healthy neighbourhoods.</p> <p>Policy objectives of note, in Chapter 4, in this regard include:</p> <ul style="list-style-type: none"> <li>● PHP2: ‘Sustainable Neighbourhood Infrastructure’</li> <li>● PHP13: ‘Equality, Social Inclusion and Participation’</li> <li>● PHP15: ‘Healthy County Plan’</li> <li>● PHP29: ‘Housing for All’</li> <li>● PHP32: ‘Traveller Accommodation’</li> <li>● PHP34: ‘Healthy Placemaking’</li> <li>● PHP35: Inclusive Design &amp; Universal Access’</li> </ul> <p>In addition to the Policy Objectives in Chapter 4, Section 12.3.3.1 ‘Residential Size and Mix’ sets out development management requirements for all new residential schemes, including a requirement that plans clearly identify proposed units that are designed and located having</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>regard to the needs of persons with a disability and are designed having regard to the concept of lifetime adaptable homes.</p> <p>While the Draft Plan includes Policy Objectives aimed at creating an inclusive County and supporting the provision of housing for all, the Council have a number of programmes and plans that provide more focused social housing policy and/or proposals including:</p> <ul style="list-style-type: none"> <li>• The DLR Traveller Accommodation Programme 2019-2024</li> <li>• The DLR Housing and Disability Strategic Plan</li> </ul> <p>It is noted that any individual (third party) has the ability to make submissions / observations to any proposed development received through the development management process. Furthermore, council policy documents including the County development plan and Part 8 development proposals, are subject to public consultation that are open to all to participate in.</p> <p>In formulating this response, the Executive have in accordance with section 12 (8) (b) (iii) of the Planning and Development Act, 2000, (as amended) taken account of the strategic direction received from the members at pre-draft stage <i>"That the Chief Executive ensures that inclusivity as a theme permeates through relevant policies of the Draft Plan"</i>.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission welcomes the provision of a social inclusion unit within the council and recommends measures to improve social inclusion including promoting access to a wide range of opportunities, active citizenship, alcohol-free venues, community shared services, measures to tackle isolation.</p>	<p><b><u>B0627</u></b></p>		<p>The Executive welcomes the support provided and notes the recommendations made many of which fall outside of the remit of the County Plan.</p> <p>The Draft Plan contains a series of Policy Objectives aimed at promoting inclusiveness across the County. Section 1.7 'Development Plan Vision' of the Draft Plan states that <i>"the Vision for Dún Laoghaire-Rathdown is to embrace inclusiveness, champion quality of life through healthy placemaking, grow and attract a diverse innovative economy and deliver this in a manner that enhances our environment for future generations"</i>. In order to deliver on this vision, the Draft Plan includes 5no. Strategic County Outcomes (SCO's), including SCO no.4: <i>"Creation of an Inclusive and Healthy County"</i>.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>Following on from the Vision and SCO’s in Chapter 1 of the plan, Chapter 4 in particular contains a suite of Policy Objectives aimed at creating and improving inclusive, healthy neighbourhoods / communities through promoting the retention and provision of appropriate sustainable neighbourhood infrastructure – including educational facilities, and the creation of inclusive and healthy neighbourhoods. Of particular note in this regard is Policy Objective PHP13: ‘Equality, Social Inclusion and Participation’ which states:</p> <p><i>“It is a Policy Objective to promote equality and progressively reduce all forms of social exclusion that can be experienced because of gender, gender identity, marital status, family status, age, race, religion, disability, sexual orientation, nationality, homelessness and membership of the Traveller Community and promote active participation consistent with RPO 9.1 and RPO 9.2 of the RSES.”</i></p> <p>Chapter 4 of the Draft Plan contains a number of Policy Objectives aimed at supporting and facilitating a variety of sustainable neighbourhood facilities that will aid in access to ongoing learning and education opportunities and community based facilities and initiatives, including Policy Objectives:</p> <ul style="list-style-type: none"> <li>● PHP2: ‘Sustainable Neighbourhood Infrastructure’</li> <li>● PHP5: ‘Community Facilities’</li> <li>● PHP7: ‘Schools’</li> <li>● PHP8: ‘Further and Higher Education Facilities’</li> <li>● PHP10: ‘Music, Arts and Cultural Facilities’</li> <li>● PHP11: ‘Libraries’</li> </ul> <p>Any gaps in terms of community facilities and/or specific needs for particular areas would be identified in a Community Audit for the County which is facilitated and supported through PHP5.</p> <p>In addition to the Policy Objectives of the Draft Plan, the Council have engaged with Hub na nOg which operates as part of DCEDIY (Department of Children, Equality, Disability, Integration and Youth) , to provide support and training for strengthening the voice of children and young people in decision making with regard to plans, policies and programmes across DLR, with particular attention to providing opportunities for non-national children,</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>children with disabilities and those from economically disadvantaged backgrounds to have their voice heard.</p> <p>In formulating this response, the Executive have in accordance with section 12 (8) (b) (iii) of the Planning and Development Act, 2000, (as amended) taken account of the strategic direction received from the members at pre-draft stage <i>“That the Chief Executive ensures that inclusivity as a theme permeates through relevant policies of the Draft Plan”</i>.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submission seeks the inclusion of new communities through support of multicultural initiatives that showcase diversity.</p>	<p><b><u>B1075</u></b></p>		<p>The Executive notes and agrees with the sentiment of the issue raised.</p> <p>The Draft Plan incorporates Policy Objectives that support inclusivity and provides the spatial framework for the provision of facilities and improved public spaces. The provision of multicultural initiatives is not, however, a County Development Plan matter, rather this would be provided through the Councils Social Inclusion Unit.</p> <p>Since 2010 the Council has developed a variety of festivals and events that effectively support and promote social inclusion and cultural diversity across DLR throughout the year. There is also greater focus on supporting and promoting inclusion and cultural diversity within and by our local communities, and the annual Festival of Inclusion has become an annual showcase event for many local community groups and volunteers to demonstrate the work in the local community that supports diversity and inclusion. The Festival of Inclusion celebrates, promotes and supports cultural diversity and social inclusion.</p> <p>In formulating this response, the Executive have in accordance with section 12 (8) (b) (iii) of the Planning and Development Act, 2000, (as amended) taken account of the strategic direction received from the members at pre-draft stage <i>“That the Chief Executive ensures that inclusivity as a theme permeates through relevant policies of the Draft Plan”</i>.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p><b>3.4.3.2: Policy Objective PHP14: Age Friendly Strategy</b></p>			

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>i) Submission requests the insertion of an Age Friendly Strategy in the Development Plan – funding for the strategy should be prioritised. As a minimum, improvements aimed at improving the life of older people should be implemented across the County.</p> <p>Submission queries whether the new Age Friendly Strategy consultation feed into the Plan?</p>	<p><b><u>B0910</u></b> <b><u>B0942</u></b></p>		<p>The Executive notes the issue raised.</p> <p>The DLR Age Friendly Strategy is a standalone document to the County Development Plan. Funding for the strategy is not a strategic County Development Plan issue.</p> <p>The Council adopted its first Age Friendly Strategy in 2016. A new Age Friendly Strategy, for the period 2021 – 2026, is currently being prepared and will follow nine themes which are used as a basis for improvements that can be made to ensure that our County is an 'Age Friendly' place and include: Outdoor Spaces and Buildings; Transportation; Housing; Social Participation; Respect and Social Inclusion; Civic Participation and Employment; Communication and Information; Community Support and Health Services; and, Safety and Security. The Strategy aims to identify the issues raised by older people and service providers and make real improvements which will enhance community well-being and the quality of life of our older citizens.</p> <p>Policy Objective PHP14 of the Draft County Development Plan supports and facilitates the implementation of the current Dún Laoghaire-Rathdown Age Friendly Strategy 2016-2020.</p> <p>In formulating this response, the Executive have in accordance with section 12 (8) (b) (iii) of the Planning and Development Act, 2000, (as amended) taken account of the strategic direction received from the members at pre-draft stage <i>"That the Chief Executive ensures that inclusivity as a theme permeates through relevant policies of the Draft Plan"</i>.</p> <p><b>Recommendation</b> Amend 4.2.2.3, Policy PHP14 (pg. 78) of the Draft Plan as follows:</p> <p>Update the period for the forthcoming Age Friendly Strategy from "2021-2024" to "2021-2026".</p>
<b>3.4.4: Delivering and Improving Homes</b>			
<b>3.4.4.1: Policy Objective PHP18: Residential Density</b>			
<p>ii) Submissions received both in favour and against higher densities requesting that:</p>	<p><b><u>B0062</u></b> <b><u>B0126</u></b> <b><u>B0232</u></b></p>	<p>4 9 10</p>	<p>The Executive notes the issues raised and disagrees with requests to either increase or decrease residential densities from that contained in Policy Objective PHP18.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> <li>An obsession with high density stops as it results in poor quality of life and excludes people with disabilities, older people and families.</li> <li>The emphasis in the Plan on the achievement of housing density and ensuring the best use of land, risks being incompatible with good quality housing and sustainable work life balance, building communities and place making.</li> <li>Suburbs and rural areas should be designed for lower density development.</li> <li>Density is increased to 100uph near transport or town centres and 60uph as a default minimum.</li> <li>Density of 36 houses should be reduced in the areas where no essential services exist.</li> <li>Lowering of density rates should be considered for Dalkey where new development results in traffic congestion.</li> <li>Density of development in Kiltiernan must be limited to accord with the character of the area.</li> <li>Suburban Dublin needs increased density to combat urban sprawl.</li> <li>Increased density can be achieved through a range of housing types in buildings of 5 to 8 storeys, with a smaller number of areas designated for taller structures e.g. Dundrum, Stillorgan, Blackrock, Dún Laoghaire and Sandyford.</li> <li>Requests an indication of appropriate unit densities pertaining to residential zoned lands at Quarry Road.</li> </ul>	<p><b><u>B0334</u></b>  <b><u>B0840</u></b>  <b><u>B0890</u></b>  <b><u>B1003</u></b>  <b><u>B1165</u></b>  <b><u>B1206</u></b>  <b><u>B1220</u></b></p>	14	<p>The National Planning Framework (NPF) has a clear focus of increasing housing supply through compact growth in existing urban and built-up areas through brownfield or infill development. The NPF states that Dublin needs to accommodate a greater proportion of growth within its metropolitan boundary. Dún Laoghaire-Rathdown is located within the Dublin Metropolitan Area with a large portion of the County located within the Dublin City and Suburbs area, as illustrated in Figure 1.3 (p.11) in Chapter 1 'Introduction, Vision and Context' of the Draft Plan.</p> <p>Overarching Policy Objective PHP1 at the start of Chapter 4 (p.67) requires increased delivery of housing to:</p> <ul style="list-style-type: none"> <li>align with NPF, Regional Spatial and Economic Strategy (RSES).</li> <li>accord with the Core Strategy in Chapter 2 and Appendix 2 which sets out the Housing Strategy and Interim Housing Need Demand Assessment for the County, and,</li> <li>ensure that residential development is delivered in tandem with appropriate enabling infrastructure such as transport, open space and sustainable neighbourhood infrastructure.</li> </ul> <p>The Core Strategy in Chapter 2 includes a settlement hierarchy and settlement strategy for the County, identifying appropriate areas of the County for housing and employment growth. Policy Objective PHP18: 'Residential Density' promotes the compact growth of housing through higher residential densities in appropriate locations. The introduction of Section 4.3.1 'Delivering and Improving Homes', immediately prior to Policy Objective PHP18 states that: "<i>Housing growth in DLR will occur in either of the following:</i></p> <ul style="list-style-type: none"> <li><i>Existing built up areas, promoting compact urban growth through the development in the form of infill development of brownfield sites.</i></li> <li><i>Creation of new residential communities (refer Core Strategy Map, Figure 2.9, Chapter 2)".</i></li> </ul> <p>Any reduction in residential density below the minimum requirement of 50 units per hectare (uph) in the appropriate specified areas or below the minimum default of 35uph, would be contrary to the provision of Ministerial Guidelines - Sustainable Residential Development in Urban Areas', 2009. It is important to note that the densities set out in PHP18 are minimum densities and higher densities than those listed are generally achieved throughout the County.</p> <p>A Local Area Plan may set out higher densities to those listed within the County Development Plan where it is considered appropriate to do so. It is considered that a Local Area Plan is the</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<ul style="list-style-type: none"> <li>• Requests that density has regard to the character of Rathmichael and the recommendations of landscape character assessments.</li> <li>• Small cluster, low rise development with enhanced green space and connectivity would align with DLR policy and NPF.</li> <li>• Supply of new housing will have a detrimental effect on existing neighbourhoods, heritage, landscape and natural habitats. Urges decision-makers to consider the effects of allowing inappropriate and overscale developments.</li> </ul>			<p>most appropriate mechanism to alter density parameters as local circumstances can be taken into account. This may result in specific sites frameworks being prepared that identify areas / plots with higher or lower densities being applied having regard to the characteristics of an area, phasing of development and the delivery of infrastructure. The Kiltiernan-Glenamuck Local Area Plan (2013-2023), for instance, sets out a development strategy for that area having regard to its character and infrastructure that is required to sustain growth in the area.</p> <p>All proposed development is required to adhere to all relevant Policy Objectives within a County Development Plan, including those centred around traffic increase, and development management standards and guidance that is set out in Chapter 12 of the Draft Plan. This will ensure that proposed development resulting higher density will be balanced against the protection and/or improvement of existing amenities in an area. The use of appropriate building height, in accordance with Policy Objective PHP39: ‘Building Design and Height’ and Appendix 5: ‘Building Height Strategy’, is one mechanism that can be used to achieve higher density within a site.</p> <p>It is not considered that higher density would be detrimental to quality of life or would hinder the provision of housing for older people or persons with a disability. The Draft Plan has a clear focus on improving quality of life for all through high quality design, creating attractive and healthy neighbourhoods that incorporate commensurate enabling social and community infrastructure (Sustainable Neighbourhood Infrastructure) and that provide for a choice of homes. Indeed, Policy Objective PHP29: ‘Housing for All’ supports the provision of housing for older people and persons with a disability.</p> <p>In formulating this response, the Executive have in accordance with section 12 (8) (b) (iii) of the Planning and Development Act, 2000, (as amended) taken account of the strategic direction received from the members at pre-draft stage <i>“When developing policies for brownfield sites, the impact on existing environment, communities and the public realm should be taken into account.”</i></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submissions request that PHP18 is amended to:</p>	<p><u><b>B0581</b></u> <u><b>B0801</b></u></p>		<p>The Executive notes the issues raised.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<ul style="list-style-type: none"> <li>Recognise ‘Design Standards for New Apartments’ Guidelines 2020 and the role of apartments in delivery of national housing targets.</li> <li>Incorporate ‘Urban Development &amp; Building Height’ Guidelines 2018</li> <li>Apartment Guidelines. A suggested wording is given.</li> </ul>	<p><b><u>B0805</u></b>  <b><u>B0823</u></b>  <b><u>B0887</u></b>  <b><u>B0889</u></b>  <b><u>B0889</u></b>  <b><u>B0891</u></b>  <b><u>B0891</u></b>  <b><u>B0960</u></b>  <b><u>B1043</u></b></p>		<p>It is acknowledged that both the ‘Design Standards for New Apartments’ Guidelines 2020 and ‘Urban Development &amp; Building Height’ Guidelines 2018 play a role in the delivery of increasing housing supply. The development management criteria for new residential development is set out in Chapter 12 ‘Development Management’ of the Draft Plan. Development management criteria for apartments is provided in Section 12.3.5 ‘Apartment Development’ where the specific requirements of the guidelines are set out.</p> <p>Policy Objective PHP39: ‘Building Height &amp; Design’ and Appendix 5 ‘Building Height Strategy’ provide specific guidance with regard to building height and refer to the requirements of the guidelines.</p> <p>The provision of apartments and increasing heights are not, however, the only means of accelerating housing or increasing density. Increased density can also be achieved through other low-medium height housing typologies such as town houses and duplexes. For this reason, the Draft Plan relies upon the ‘Sustainable Residential Development in Urban Areas’ Guidelines, 2009 to guide density and promote a mix of housing type rather than promote one specific house type such as apartments.</p> <p>It is noted, however, that Section 2.4 of the “Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities” 2018 and 2020 refer to suitable locations for apartment development. This section refers to walking distances from certain locations (city, town, employment or transport links) and net densities for ‘intermediate urban locations’ and ‘peripheral and/or less accessible urban locations’, however these guidelines do not redefine density parameters for all residential development. Rather than include reference to these guidelines under policy Objective PHP18, it is considered more appropriate to include reference to them within Chapter 12 ‘Development Management’, under Section 13.3.3.2 ‘Residential Density’.</p> <p>Part of an amended policy wording provided is considered to be appropriate and to that end, it is considered reasonable to incorporate ‘increase housing supply’, ‘proximity and accessibility considerations’, and refer to development management criteria set out in Chapter 12 within the policy wording.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>Amend Policy Objective PHP18: Residential Density from:</p> <p><i>“It is a Policy Objective to:</i></p> <ul style="list-style-type: none"> <li>• <i>promote compact urban growth through the consolidation and re-intensification of infill/brownfield sites.</i></li> <li>• <i>Encourage higher residential densities provided that proposals provide for high quality design and ensure a balance between the protection of existing residential amenities and the established character of the surrounding area, with the need to provide for high quality sustainable residential development.”</i></li> </ul> <p>To:</p> <p><i>“It is a Policy Objective to:</i></p> <ul style="list-style-type: none"> <li>• <i><u>Increase housing (houses and apartments) supply and promote compact urban growth through the consolidation and re-intensification of infill/brownfield sites having regard to proximity and accessibility considerations, and development management criteria set out in Chapter 12.</u></i></li> <li>• <i>Encourage higher residential densities provided that proposals provide for high quality design and ensure a balance between the protection of existing residential amenities and the established character of the surrounding area, with the need to provide for high quality sustainable residential development.”</i></li> </ul> <p>Amend Section 12.3.3.2 ‘Residential Density’ (p.234) in Chapter 12 of the Draft Plan from:</p> <p><i>“In general, the number of dwellings to be provided on a site should be determined with reference to the Government Guidelines document: ‘Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities’ (2009). As a general principle, and on the grounds of sustainability, the objective is to optimise the density of development in response to type of site, location, and accessibility to public transport. (See policy PHP18, Chapter 4)”.</i></p> <p>To:</p> <p><i>“In general, the number of dwellings (<u>houses or apartments</u>) to be provided on a site should be determined with reference to the Government Guidelines documents:</i></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<ul style="list-style-type: none"> <li>• <i>'Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities' (2009).</i></li> <li>• <i>Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2020)</i></li> </ul> <p><i>As a general principle, and on the grounds of sustainability, the objective is to optimise the density of development in response to type of site, location, and accessibility to public transport. (See policy PHP18, Chapter 4)".</i></p>
iv) Submission argues that the protection of additional buildings in the Rathmichael area is at odds with the density proposals for the area which would destroy the heritage, character and rural charm and result in a house dominated town.	<b><u>B1033</u></b>	10	<p>The Executive notes, however, respectfully disagrees with the issue raised.</p> <p>The addition of structures / buildings onto the RPS is viewed positively as this will protect both the historic value of a building / structure and aid in the protection of the character of an area. Higher densities can be, and often are, achieved in tandem with the protection of built heritage through considered and appropriate design responses.</p> <p>The Draft Plan contains a suite of Policy Objectives and guidance in Chapters 4. 'Neighbourhood - People, Homes and Place', 11. 'Heritage and Conservation' and 12. 'Development Management', which would guide the delivery of higher density whilst protecting built heritage in the County.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
v) Submission considers that the Plan should fully articulate and express National Policy Objective (NPO) 33.	<b><u>B1120</u></b> <b><u>B1145</u></b>		<p>The Executive agrees with the issue raised.</p> <p>National Planning Objective (NPO) 33 in the National Planning Framework states: <i>"Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location".</i></p> <p>The Core Strategy in Chapter 2 of the Draft Plan identifies suitable locations for new homes in the County. The Core Strategy of the Draft Plan includes a settlement strategy for the County identifying appropriate areas of the County for housing and employment growth.</p> <p>Overarching Policy Objective PHP1 at the start of Chapter 4 (p.67) requires increased delivery of housing to:</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<ul style="list-style-type: none"> <li>• Align with NPF, Regional Spatial and Economic Strategy (RSES).</li> <li>• Accord with the Core Strategy in Chapter 2 and Appendix 2 which sets out the Housing Strategy and Interim Housing Need Demand Assessment for the County, and,</li> <li>• Ensure that residential development is delivered in tandem with appropriate enabling infrastructure such as transport, open space and sustainable neighbourhood infrastructure.</li> </ul> <p>Section 4.3.1 ‘Delivering and Improving Homes states that <i>“Housing delivery should have regard to the capacity of all required enabling infrastructure including physical infrastructure such as transport, water and drainage, and social infrastructure”</i>.</p> <p>Policy objective PHP18: ‘Residential Density’ sets out parameters for the delivery of housing through compact growth and through promoting higher densities in certain locations i.e. proximate to public transport and/or district centres.</p> <p>Section 6.6 ‘Location of Homes’ in the NPF states that future homes should be located <i>“where people have the best opportunities to access a high standard quality of life.”</i> While the Policy Objectives of the Draft Plan aim to achieve the provision of new homes in a sustainable manner and embeds the concept of ‘quality of life’, the Draft Plan does not explicitly refer to NPO 33. It is therefore considered appropriate to refer to NPO33 in both the Core Strategy and in Section 4.3.1.</p> <p><b>Recommendation</b>  Amend paragraph 1 of Section 2.4.3 ‘Sustainable Neighbourhood Infrastructure’ (p.34) by adding a new sentence to the end as follows:</p> <p><i><u>“This will align with NPO33 in the NPF by ensuring that new homes are delivered in a sustainable manner.”</u></i></p> <p>Amend the first sentence of Section 4.3.1 ‘Delivering and Improving Homes’ from:</p> <p><i>“Housing growth in DLR will occur in either of the following:”</i></p> <p>To:</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<i>"The provision of new homes will be encouraged in suitable locations across the County that support sustainable development (consistent with NPO 33 of the NPF). In this regard, housing growth in DLR will occur in either of the following:"</i>
vi) Submission Considers that Plan should continue pattern of elegant squares that make up Dublin and suggest a return to 19 <sup>th</sup> century low rise higher density model achieving densities of 100 units per hectare with 3 or 4 storeys. Also suggest using the city block as utilised in Berlin, Barcelona and other cities	<b><u>B1191</u></b>		<p>The Executive notes the issue raised.</p> <p>Rather than stipulate any particular form of urban design of form, the Policy Objectives of the Draft Plan enable flexibility in terms of achieving higher densities. This flexibility is considered prudent, particularly in more built up areas where more compact forms of infill development are likely to be located. A Local Area Plan may contain more refined urban frameworks to help guide the development of sites.</p> <p>The form and layout of any new development will not only be assessed against density or height. Policy objectives PHP34: 'Healthy Placemaking' and PHP39: 'Building Design &amp; Height' place a focus on high quality design for new development. Policy Objective PHP34 requires new development to have "proper consideration of context, connectivity, inclusivity, variety, efficiency, distinctiveness, layout, public realm, adaptability, privacy and amenity, parking, wayfinding and detailed design."</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
vii) Submission states that the A1 lands at Old Connaught should be capable of delivering a min of 50uph and rise to 80uph within 200m of the proposed Luas station. Will DLRCOCO be maximising the zoning of the A1 land especially near the transport modes.	<b><u>B1016</u></b>		<p>The Executive notes the issues raised.</p> <p>The Old Connaught Local Area Plan listed "to be prepared" in table 2.15 'Local Area Plan-Making Programme' (p.44), will guide residential densities at a local level. Densities proposed within the LAP will be required to adhere to minimum densities set out within the Draft Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
viii) Submission states that dichotomy exists in County Development Plan between 'higher density' new development and protecting the residential amenity of the existing.	<b><u>B1206</u></b>		<p>The Executive notes but respectfully disagrees with the issue raised.</p> <p>Policy Objective PHP18: 'Residential Density' seeks to "ensure a balance between the protection of existing residential amenities and the established character of the surrounding area, with the need to provide for high quality sustainable residential development". This</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>balance between higher density and existing amenities can, and does, exist through high quality design that employs appropriate layouts, scale and massing.</p> <p>In addition to PHP18, the Draft Plan contains a series of Policy Objectives, including those within Section 4.4.1 ‘Quality Design &amp; Placemaking’, and development management standards and guidance in Chapter 12 aimed at ensuring higher density development is provided for in an appropriate manner.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>Constraints to Higher Density</b>			
<p>ix) Submission states that the statement “new residential development will be required to minimise any adverse effect in terms of height, scale, massing and proximity” is a threat to sustainable development and the inclusion of limited grounds for “the capacity of the local road network” as an excuse to prevent development is a bad move.</p>	<p><b>B1206</b></p>		<p>The Executive notes but respectfully disagrees with the issue raised.</p> <p><u>Section 10 (2) (f) and (g) of the Planning and Development Act, 2000 (as amended) states that “(2)...a development plan shall include objectives for - ...</u></p> <p><i>(f) the protection of structures, or parts of structures, which are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest;</i></p> <p><i>(g) the preservation of the character of architectural conservation areas;”</i></p> <p>In addition to listing Protected Structure, Architectural Conservations Areas (ACA) and the Record of Monuments and Place in Appendix 4 of the Draft Plan. The Written Statement of the Draft Plan includes detailed Policy Objectives aimed at protecting the built heritage of the County, in the main, these are located in Chapter 11.</p> <p>‘Constraints to Higher Density’ in Policy Objective PHP18: ‘Residential Development’ acts to highlight ‘some circumstances’ where higher residential densities ‘may’ be constrained, this is not, however, always the case.</p> <p>This section of Policy Objective PHP18 also notes that there ‘may’ be ‘some’ areas where higher densities may not be achieved “<i>as a consequence of other infrastructural shortcomings</i>”. An example of local road capacity is provided, however, this infrastructural</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>shortcoming may include any enabling infrastructure for development. It is noted that this section concludes by stating “<i>The number of such sites would, however, be limited.</i>”</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>Notable Character Area Exclusion</b>			
<p>x) Submissions received in relation to the ‘Notable Character Area’ or 0/0 objective:</p> <ul style="list-style-type: none"> <li>• Requesting that the policy wording be reviewed and clarified to define ‘special character’ and clarify ‘suitable site’.</li> <li>• Proposing that Kiltiernan and the surrounding areas of Ballycorus/Rathmichael and Glencullen should also be considered as areas of notable character.</li> <li>• notes that this designation does not align with the National and Regional imperatives of compact growth and infill development.</li> </ul>	<p><b>B0568</b> <b>B0743</b></p>	<p>4 7 9 10</p>	<p>The Executive notes the issues raised</p> <p>As already responded to in detail in this report under Section 2.1 ‘Summary of the Observations, Submissions and <b>Recommendations</b> of the Office of the Planning Regulator’, subsection 2.1.7 ‘Infill and brownfield development’, the 0/0 zone was reviewed while preparing the Draft Plan. This review resulted in a change to the boundary of the 0/0 zone and revised wording was set out in Policy Objective PHP18: Residential Density. As per the recommendations made by the OPR in their submission no. <u>B1102</u>, the Executive have recommended to omit the ‘Notable Character Area Exclusions’ section under Policy Objective PHP18 and the corresponding development management section in Chapter 12, Section 12.3.8.8. It is also recommended to omit the 0/0 zone from maps 4, 7 and 10. An SLO is recommended.</p> <p>The Kiltiernan-Glenamuck area and Rathmichael area are identified as ‘new growth areas’ in the Core Strategy in Chapter 2 of the Draft Plan. Having regard to this designation and the recommendations of the OPR, it is not considered appropriate to apply the 0/0 objective to these areas.</p> <p>Glencullen is zoned ‘Objective G’ – “To protect and improve high amenity areas” and the Ballycorus area, between Kiltiernan and Rathmichael, is zoned both ‘Objective G’ and ‘Objective ‘B’ – “To protect and improve rural amenity and to provide for the development of agriculture”. These land use zoning objectives already provide a high level of protection to the rural character of these areas.</p> <p><b>Recommendation</b> See detailed recommendation as set out in section 2.1 above.</p>
<b>3.4.4.2: Policy Objective PHP19: Existing Housing Stock - Adaptation</b>			

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>i) Submission requests that all new homes should have solar panels, heat pumps and water harvesters as standard and accessible surface visitor parking for all housing complexes and apartments.</p>	<p><b>B0406</b></p>		<p>The Executive notes the issues raised.</p> <p>The Draft Plan contains a suite of Policy Objectives and development management guidance that supports a low carbon and a climate resilient County. Policy Objective CA5: ‘Energy Performance in Buildings’ in Chapter 3 of the Draft Plan supports energy efficiency and the use of renewable energy sources in existing and new buildings. Building Regulations rather than the County Development Plan will apply specific requirements with regard to energy efficiency of new homes.</p> <p>Policy Objective EI1: ‘Sustainable Management of Water’ in Chapter 10 encourages the advancement of rain water harvesting and Policy Objective EI6: ‘Sustainable Drainage Systems’ states: <i>“It is a Policy Objective to ensure that all development proposals incorporate Sustainable Drainage Systems (SuDS).”</i> Appendix 7 Sustainable Drainage System Measures of the Draft Plan provides specific detail with regard to measure that could be employed in new development – this includes measures such as rainwater harvesting.</p> <p>It is noted that reference is made to ‘Section 12.8.6.3 SuDS’ within Policy Objective EI6, however, this should be ‘12.8.6.2 SuDS (Sustainable Drainage Systems)’. In addition, there is reference to SuDS requirements within 12.9.6 ‘New Development/Change of Use - Environmental Impacts’ and specific SuDS requirements contained in Appendix 7. It is therefore considered appropriate to refer to amend Policy Objective EI6 to include all references to other sections of the Draft Plan with regard to SuDS.</p> <p>Specific details with regard to parking requirements for new development is set out in Section 12.4.5 ‘Car Parking Standards’ in the Draft Plan. This includes reference to visitor parking and parking layout / design.</p> <p><b>Recommendation</b>  Amend the last sentence (in brackets) of paragraph one, Policy Objective EI6: ‘Sustainable Drainage Systems from:  <i>“(See also Section 12.8.6.3 SuDS)”</i></p> <p>To:</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<i>“(See also Section 12.8.6.32 SuDS (Sustainable Drainage Systems) and Appendix 7 Sustainable Drainage System Measures)”</i>
<b>3.4.4.3: Policy Objective PHP20: Protection of Existing Residential Amenity</b>			
<p>i) Submissions seeking amendments to the requirements set out in Policy objective PHP20. Issues raised include:</p> <ul style="list-style-type: none"> <li>• The last two bullet points should be omitted as they too prescriptive and not always necessary/appropriate. Good design and layout will consider issues such as separation distances and protection of existing residential amenities</li> <li>• PHP20 would be a threat to sustainable development by setting too low a density threshold. The 50 units per hectare requirement should be scrapped or revised to 100uph</li> <li>• PHP20 should be updated to state that new buildings in excess of 2 storeys above the surrounding buildings should not be permitted within 100 metres of existing buildings</li> </ul>	<p><b><u>B0873</u></b>  <b><u>B1046</u></b>  <b><u>B1125</u></b>  <b><u>B1206</u></b></p>	<p>1 14</p>	<p>The Executive notes the issues raised.</p> <p>Policy Objective PHP20 ‘Protection of Existing Residential Amenity’ ensure that existing residential amenities are protected against new, higher density, development. It is noted that Policy Objectives PHP18: ‘Residential Density’ and PHP19: ‘Existing Housing Stock – Adaptation’ require new development to have regard to existing amenities.</p> <p>Policy Objective PHP20 essentially refines the requirement to protect existing amenities of other Policy Objectives by setting out specific considerations for new higher density development in existing built up areas.</p> <p>Policy Objective PHP20 does not seek to reduce residential density below that set out within PHP18 or the ‘Sustainable Residential in Urban Areas’ Guidelines (2009), rather it is aimed at development with densities in excess 50 units per hectare, which is set as a minimum density for development in close proximity to transport links and town centres in PHP18.</p> <p>The requirement to ‘consider’ a setback for developments of 4 storeys or more is considered an appropriate response to increased building heights. A 100m restriction is excessive and would often exceed the width / length of a site and would therefore act as a barrier to appropriately designed infill development.</p> <p>In formulating this response, the Executive have in accordance with section 12 (8) (b) (iii) of the Planning and Development Act, 2000, (as amended) taken account of the strategic direction received from the members at pre-draft stage <i>“When developing policies for brownfield sites, the impact on existing environment, communities and the public realm should be taken into account.”</i></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.4.4.4: Policy Objective PHP21: Development on Institutional Lands</b>			

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>i) Submissions received in relation to changes to the INST objective and requirements of Policy Objective PHP21 raising issues as follows:</p> <ul style="list-style-type: none"> <li>• The requirement for public open space, provision of 25% open space conflicts with section 12.3.8.11 which requires 20%.</li> <li>• To require a school site with the ‘INST’ objective to retain 20% publicly accessible open space would compromise the security of children by having open spaces dispersed within school environments.</li> <li>• The open space requirement for INST lands is punitive on the institutions and promotes inequality between Institutional owners and other landowners / developers.</li> <li>• The open space requirement seems to conflict with the 10-minute rule and to DLR housing needs (including density levels) as well as depriving and/or reducing the in many cases charities of much needed funds for 'downsizing ' and other charitable purposes. Indeed, the funds generated may also help with funding 'Institutional Redress Schemes'.</li> <li>• Notes the material alteration in the ‘INST’ Objective to provide a percentage of ‘public open space’ under the Draft County Development Plan, which replaces a reference to ‘open space’ in the current County Development Plan. Submits the text should refer to ‘open space’ and not ‘public open space’ as this places an additional burden on the development of ‘INST’ lands.</li> </ul>	<p><b>B0785</b> <b>B0906</b> <b>B1132</b></p>	<p>1</p>	<p>The Executive notes the issues raised.</p> <p>A higher open space requirement applies to lands with an ‘INST’ objective in order to retain the open character and/or recreational amenity of land parcel. Section 4.20 of the Section 28 Planning Guidelines ‘Sustainable Residential Development in Urban Areas’ (2009) states: <i>“In institutional lands and ‘windfall’ sites which are often characterised by a large private or institutional building set in substantial open lands and which in some cases may be accessible as an amenity to the wider community, any proposals for higher density residential development must take into account the objective of retaining the “open character” of these lands, while at the same time ensuring that an efficient use is made of the land. In these cases, a minimum requirement of 20% of site area should be specified”.</i></p> <p>It is noted that there is a conflict between the open space requirements of Policy Objective PHP21 and section 12.3.8.11 “Institutional Lands”. Having regard to the provisions of the ‘Sustainable Residential Development in Urban Areas’ Guidelines, it is recommended that the Draft Plan is amended to require lands with an ‘INST’ objective to retain 20% accessible open space as an amenity to the wider community. This open space would form part of public open space serving any future development as per Section 12.8.3.1 ‘Public Open Space’.</p> <p>The Executive would respectfully disagree that open space requirements are punitive or that they would conflict with other parts of the plans. Institutional Lands are typically set within larger open and landscaped sites with a ‘parkland’ character. A higher open space standard is applied to these sites in order to retain this open character of the lands. Lands with the ‘INST’ objective would typically be capable of achieving the minimum densities required within the Draft Plan and would be ideally located within or adjoining established residential neighbourhoods where downsizing opportunities could be explored.</p> <p>A key part of the vision for the County is to <i>“champion quality of life through healthy placemaking”</i> and Strategic County Objective 4 is <i>“The creation of an Inclusive and Healthy County”</i>. The provision of accessible public open spaces is will aid in the delivery of this vision and objective and in turn may provide for new pedestrian/cycle linkages that would in turn reduce journey times to and between local neighbourhood centers and/or sustainable neighbourhood facilities.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>The requirement of a masterplan for development of lands with an ‘INST’ objective would facilitate the locating of publicly accessible lands in an appropriate manner that addresses any potential issue with regard to the security of existing uses within the lands.</p> <p>In formulating this response, the Executive have in accordance with section 12 (8) (b) (iii) of the Planning and Development Act, 2000, (as amended) taken account of the strategic direction received from the members at pre-draft stage <i>“To request that the Chief Executive enhance the existing County Development Plan policies in regard to the protection of recreational and community spaces and infrastructure including areas currently with an INST objective”</i>.</p> <p><b>Recommendation</b></p> <p>Amend bullet point 1 under paragraph 2 (p.84) of Policy Objective PHP21: ‘Development on Institutional Lands’ from:</p> <ul style="list-style-type: none"> <li>• <i>“A minimum of 25% of the entire INST land parcel, as determined by the Planning Authority, will be required to be retained as accessible public open space.”</i></li> </ul> <p>To:</p> <ul style="list-style-type: none"> <li>• <i>“A minimum of <u>2025% or more</u> of the entire INST land parcel, as determined by the Planning Authority, will be required to be retained as accessible public open space”</i>.</li> </ul> <p>Amend Table 12.8 ‘Public Open Space Requirements for residential developments’ (p.280) from:</p> <p><i>“Institutional and Redevelopment of SNI use   25% (of site area)”</i></p> <p>To:</p> <p><i>“Institutional and Redevelopment of SNI <u>lands use</u>   <u>2025%</u> (of site area)”</i></p>
<p>ii) Submission notes the content of Policy Objective PHP21: Development on Institutional Land and states that proposals for the CMH site are for a density of c. 118 units p/ha. Which is significantly higher than what is proposed in the County Development Plan and will have an adverse impact of the existing neighbourhood and infrastructure.</p>	<p><b><u>B0137</u></b> <b><u>B1125</u></b></p>	<p>1</p>	<p>The Executive notes the issue raised.</p> <p>It is beyond the remit of the Draft Plan process to comment on individual planning proposals. Current applications will be assessed having regard to the provisions of the current, 2016 County Development Plan.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>It is noted, however, that Policy Objective PHP21: ‘Development on Institutional Lands’ in the Draft Plan states that:  <i>“Average net densities should be in the region of 35 - 50 units p/ha. In certain instances, higher densities may be permitted where it can be demonstrated that they can contribute towards the objective of retaining the open character and/or recreational amenities of the lands.”</i></p> <p>This requirement does not restrict density within lands subject of an ‘INST’ objective rather, <i>“higher densities may be permitted where it can be demonstrated that they can contribute towards the objective of retaining the open character and/or recreational amenities of the lands”</i>. Density and open space will be assessed for specific sites through the Development Management Process.</p> <p><b>Recommendation</b>                      No change to Draft Plan.</p>
<b>3.4.4.5: Policy Objective PHP23: Management of One-Off Housing</b>			
<p>i) Submission highlights the importance of a transparent and fair process in relation to Sustainable Rural Housing – affordability in this area is raised as a concern.</p>	<b>B0840</b>		<p>The Executive notes the issues raised.</p> <p>Policy Objective PHP23: ‘Management of One-off Housing’ restricts the spread of one-off housing in the rural countryside in line with National and Regional Policy Objectives. There are, however, circumstances under which housing may be accepted and this is set out within PHP23 with supplementary development management guidance set out in Section 12.3.11 ‘One-Off Housing in the Countryside’ which has been drafted having regard to the ‘Sustainable Rural Housing Guidelines for Planning Authorities’,2005 and Circulars SP05/08 and PL 2/2017.</p> <p>The criteria in PHP23 and Section 12.3.11 applies to all applicants for one-off housing – there is no specific reference to affordability with regard to rural housing either in legislation or Ministerial guidelines.</p> <p>The assessment of applications for housing in the rural areas of the County is clearly and methodically set out through the development management process.</p> <p><b>Recommendation</b>                      No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<b>3.4.5: Housing Choice</b>			
<p>i) Submission states that there is not enough focus in the plan on the provision of affordable housing stating that</p> <ul style="list-style-type: none"> <li>• The delivery of affordable housing presents a significant challenge for the achievement of the Strategic County Outcome.</li> <li>• There is a need for affordable housing to accommodate the future workforce and support the intensification of employment in identified strategic employment areas.</li> <li>• There is a need to provide affordable rental accommodation to workers in hubs such as Sandymount and Cherrywood and also provide sustainable build to buy affordable housing to develop communities.</li> </ul>	<b>B0840</b>		<p>The Executive notes the issues raised.</p> <p>Revisions to Part V of the Planning and Development Act, 2000 (as amended) as set out under the Urban Regeneration and Housing Act, 2015 stood down a legislative requirement in relation to affordable housing.</p> <p>Section 4.3.2 'Housing Choice' of the Draft Plan states:  <i>"The RSES notes that the provision "of affordable, appropriate and adaptable accommodation is a key challenge facing the State and the Region." Whilst changes to legislation and guidance have provided for new housing options in the form of Build-to-Rent (BTR) and Shared Accommodation, the legislation has yet to put in place provisions for affordable housing. ... Government policy, as per Rebuilding Ireland (2016), favours the use of publicly owned lands in the delivery of a mix of tenures, including private housing, social housing, affordable purchase and affordable rental housing."</i></p> <p>Since the publication of the Draft Plan the 'Affordable Housing Bill 2021' has been prepared which would, if enacted, <i>"provide for the provision of dwellings for the purpose of sale under affordable dwelling purchase arrangements"</i>.</p> <p>It is acknowledged that affordability is an issue in DLR, however, until such time as the Bill is enacted and the changes to Part V, the statutory basis to require affordable housing under the Planning Acts is currently not in place.</p> <p>The Draft Plan promotes a mix of housing type, size and tenure through a suite of Policy Objectives in Section 4.3.2, including, PHP26: 'Housing Mix'.</p> <p><b>Recommendation</b>  Amend paragraph 2, Section 4.3.2 'Housing Choice' to add:</p> <p><i>"The 'Affordable Housing Bill 2021' may set out legislation with regard to affordable housing when commenced"</i>.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<b>3.4.5.1: Policy Objective PHP25: Implementation of the Housing Strategy</b>			
i) Submission requests that more social units of 1 bed bungalows suitable for people with medical disabilities.	<b><u>B0056</u></b>		<p>The Executive notes the issue raised.</p> <p>The Draft Plan contains a suite of Policy Objectives aimed at providing a mix of housing types and sizes in all residential development across the County, including development by or on behalf of the Council. Policy Objectives in the Draft Plan provide for flexibility in terms of unit mix for social housing.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
ii) Submission states that solving the housing crisis in Dún Laoghaire-Rathdown should be a top priority for the Council who should argue for the maximum possible social and affordable units to be incorporated into each development that gets planning permission.	<b><u>B0079</u></b> <b><u>B1075</u></b>		<p>The Executive notes the issue raised.</p> <p>All residential developments must comply with the provisions of Part V of The Planning and Development Act, 2000 (as amended), unless a specific exemption or derogation applies. At present, the legislation requires that 10% of residential units for schemes of 10 or more units are provided for social housing. This is the maximum possible permissible under current legislation and what is required by way of the current Draft Housing Strategy and HNDA. At present the Planning Authority cannot require more than the legislation provides for and to put a requirement for a higher percentage would be misleading. The Plan does however allow for the requirement to alter should primary legislation/national policy change during the lifetime of the Plan.</p> <p>Policy Objective PHP25: 'Implementation of the Housing Strategy' states that "<i>All proposed residential developments, or mixed used development with a residential component, shall have regard to and comply with the provisions of the Housing Strategy and Part V of the Planning and Development Act, 2000 (as amended) as appropriate. In this regard, an Applicant will be required to engage with the Planning Authority at an early stage to ascertain any specific requirements in relation to their Part V obligation.</i>"</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
iii) Submission states that there is a need for a mix of housing / apartments for social, affordable and private ownership on lands close to Kingston Hall.	<b><u>B0207</u></b>	5	The Executive notes the issue raised.

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>The Draft Plan contains a suite of Policy Objectives aimed at providing a mix of housing type and size in all residential development across the County, including development by or on behalf of the Council.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Submission requests that the affordability of units in taller buildings is considered.</p>	<p><b><u>B0529</u></b></p>		<p>The Executive notes the issues raised.</p> <p>It is beyond the remit of a County Development Plan to deal with the cost of a development rather, Policy Objectives are provided to help guide the appropriate development of a County.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.4.5.2: Policy Objective PHP26 Housing Mix</b>			
<p>i) Submissions support a broad mix of residential tenures and typologies including flexible housing types and lifetime adaptable homes. An objective of the Plan should be to provide a mix of residential typologies.</p>	<p><b><u>B0271</u></b> <b><u>B0587</u></b> <b><u>B0805</u></b> <b><u>B0905</u></b></p>		<p>The Executive notes and welcomes the support provided.</p> <p>Policy Objective PHP26: 'Housing Mix' encourages sustainable residential communities through the provision of a variety of housing and apartment type, size and tenure. It is not considered appropriate that the Draft Plan focused on housing type alone, rather a more holistic range of housing type, size and tenure will provide for more sustainable and integrated residential communities. This in turn will aid in achieving two of the Strategic County Objectives set out in Chapter 2: 3. "Creation of a network of liveable towns and Villages" and, 4. "Creation of an inclusive and healthy County"</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission notes that there is no definition of 'proliferation' in Policy Objective PHP25. The plan should indicate the approach that will be taken to measuring 'proliferation' and embed this definition in Chapter 12, Development Management.</p>	<p><b><u>B0271</u></b></p>		<p>The Executive notes the issue raised.</p> <p>The term 'over proliferation' as set out in Policy Objective PHP26: 'Housing Mix' refers to an oversupply of a particular housing type resulting from a proposed development. This</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>proliferation may occur within a site, and/or in combination with other sites in a particular area.</p> <p>In this regard, proliferation would be assessed through the development management process on a case-by-case basis having regard to its location, the quantum of units, the land use zoning objectives, Section 12.3.3.1 'Residential Size and Mix' in Chapter 12, and Appendix 2 'Housing Strategy and HNDA' in the Draft Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submission states that the description of a balanced mix is unduly restrictive and proposes that the description of tenure mix be amended to read "<i>a balanced mix of units and unit sizes providing for home ownership, home rental and social housing to accommodate the needs of a mixed and balanced community</i>".</p>	<p><b><u>B0271</u></b></p>		<p>The Executive notes issue raised.</p> <p>Since the publication of the Draft Plan the 'Affordable Housing Bill 2021' has been prepared which may, if enacted, apply specific requirements with regard to tenure mix. Given that there is a state of flux around the issue of housing mix, it is considered appropriate to remove reference to specific housing tenure within Policy Objective PHP26: 'Housing Mix'.</p> <p><b>Recommendation</b> Amend paragraph 4 of Policy Objective PHP26: 'Housing Mix' from: <i>"In order to mitigate against undue segregation of tenure type, new developments should avoid an over proliferation of a single housing tenure by providing a balanced mix of private, build-to-rent and social housing to accommodate the needs of a mixed and balanced community."</i></p> <p>To: <i>"In order to mitigate against undue segregation of tenure type, new developments should avoid an over proliferation of a single housing tenure by providing a balanced mix of private, build-to-rent and social housing to accommodate the needs of a mixed and balanced community."</i></p>
<p><b>3.4.5.3: Policy Objective PHP27: Built to Rent and Shared Accommodation</b></p>			
<p>i) Submission received in relation to Policy Objective PHP27: Built to Rent and Shared Accommodation:</p> <ul style="list-style-type: none"> <li>Requesting that section 4.3.2 be amended to remove restrictions on Built to rent.</li> </ul>	<p><b><u>B0047</u></b> <b><u>B0581</u></b> <b><u>B0801</u></b> <b><u>B0840</u></b></p>		<p>The Executive notes the issues raised.</p> <p>Policy Objective PHP27: 'Build to Rent and Shared Accommodation' was drafted having regard to the 'Design Standards for New Apartments Guidelines for Planning Authorities' 2018 and</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<ul style="list-style-type: none"> <li>• PHP27 includes an amendment from ‘BTR accommodation must comply with all apartment standards set out in Section 12.3.5’ to read: ‘BTR accommodation must comply with all apartment standards set out in the ‘Design Standards for New Apartments’ Guidelines 2020’.</li> <li>• Suggests that the Build to Rent schemes have implications on building sustainable communities</li> <li>• Submission request that restrictions on apart-hotels, co-living developments be considered</li> <li>• Development is overly focussed on overpriced, high rise built-to-rent apartments which are inappropriately located in established neighbourhoods. Suggests that these are not the types of homes needed for our young people or families.</li> </ul>	<p><b>B0889</b> <b>B0905</b></p>		<p>reference to same is contained within the wording of the Policy Objective. It is considered that Build-to-Rent (BTR) does play a role in creating sustainable communities as it offers a longer term rental option for residents. Section 4.3.2 ‘Housing Choice’ in the Draft Plan promotes a range of housing options across the County.</p> <p>It is noted that there is no reference to compliance with apartment standards in PHP27, rather this reference is contained in Section 12.3.6 “Build-to-Rent Accommodation”.</p> <p>Since the preparation of the Draft Plan the Department of Housing, Local Government and Heritage have issued updated Apartment Guidelines to give effect to restrictions on Co Living Development. These updated guidelines now include a different Specific Planning Policy Requirement (SPPR) for a presumption against granting planning permission for co-living/shared accommodation development, and replace the previous, 2018 version of the Guidelines. There have been no changes to SPPR7 or SPPR8 which refer to Build-to-Rent (BTR). Having regard to the updated guidelines, it is considered appropriate to update the Draft Plan with regard to shared accommodation.</p> <p>The Draft Plan sets out suitable locations for BTR and applies specific development management criteria, all of which are in accordance with the Apartment Guidelines.</p> <p>Section 2.4 of the Guidelines states: <i>“Identification of the types of location in cities and towns that may be suitable for apartment development, will be subject to local determination by the planning authority.”</i> Section 2.4 specifically references walking times of 10-minutes to/from high capacity/frequent public transport such as DART, Luas and ‘urban bus services. The Planning Authority has determined that BTR development within DLR should be located within a 10-minute walking time from high frequency public transport as set out in Policy Objective PHP27. This not only aligns with the guidelines, but it also aligns with the 10-minute neighbourhood concept set out in PHP4: ‘Villages and Neighbourhoods’.</p> <p>In addition, Chapter 13 of the Draft Plan sets out locations deemed to be appropriate for BTR development in terms of land use zoning objectives, which include Build to Rent being permitted in principle under the following land use zoning – DC, MTC and open for consideration under the following land use zonings – A, A1, A2 and NC (subject to retaining an</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>appropriate mix of uses). It is considered reasonable to list these within Policy Objective PHP27.</p> <p>Section 12.3.6 ‘Build-to-Rent Accommodation’ of the Draft Plan aligns with the requirements of SPPR7 and SPPR8 in the Apartment Guidelines. It is noted that SPPR 8 (i) states “<i>No restrictions on dwelling mix and all other requirements of these Guidelines shall apply, unless specified otherwise</i>”. SPPR 8 allows for:</p> <ul style="list-style-type: none"> <li>• Flexibility in storage and private amenity space “at the discretion of the planning authority.” Section 12.3.6 provides for this subject to certain criteria.</li> <li>• Reduced car parking on the basis of location. Car parking standards are dealt with under Section 12.4.5 of the Draft Plan and take account of location.</li> <li>• BTR development not being required to apply the 10% increase floor areas or comply with 12 units per floor per core.</li> </ul> <p>All other parts of the Apartment Guidelines apply to BTR developments. These requirements are set out within Section 12.3.5 ‘Apartment Development’ in the Draft Plan. In order to ensure that the 10% increase in floor area and 12 units per core are inadvertently applied to BTR development, a caveat will be applied to these requirements in Section 12.3.5.</p> <p>The Draft Plan does not apply any mix requirement to BTR development, however, for the avoidance of doubt a note to this affect will be applied to Section 12.3.3.1 ‘Residential Size and Mix’ in the Draft Plan.</p> <p>In relation to aparthotels the Draft Plan contains a new section in Chapter 12 pertaining to same (section 12.5.2).</p> <p><b>Recommendation</b>                      In Chapter 4 – amend Section 4.3.2 ‘Housing Choice’ to omit references to ‘shared accommodation’ within its text on page 86.</p> <p>Amend section 4.3.2.3 ‘Policy Objective PHP27: Build-to-Rent and Shared Accommodation’ (p89) from:</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><i>“Policy Objective PHP27: Build-to Rent and Shared Accommodation It is a Policy Objective to facilitate the provision of Build-to-Rent and Shared Accommodation in suitable locations across the County and accord with the provisions of ‘Sustainable Urban Housing: Design Standards for New Apartments’, 2018 (and any amendment thereof). Proliferation of these housing types should be avoided in any one area.</i></p> <p><i>Provision of ‘Build-to-let’ accommodation was first introduced in 2015 under the provisions of the ‘Sustainable Urban Housing: Design Standards for New Apartments’. The amended Apartment Guidelines issued in 2018 expanded upon the ‘new’ housing tenure typologies by introducing Specific Planning Policy Requirements (SPPR’s) for Build-To Rent (SPPR 7 and 8) and Shared Accommodation (SPPR 9). Both housing tenures offer centrally managed rental options to the market and add to the mix of accommodation that could be provided for in certain areas. Build-to-rent (BTR) accommodation will be facilitated at appropriate locations across the County in accordance with land use zoning objectives. Shared Accommodation shall only be provided in accordance with land use zoning objectives, in either areas zoned objective MTC (Major Town Centre) or DC (District Centre). Both BTR and Shared Accommodation shall be located within a 10 minute walking time from high frequency public transport routes. BTR and Shared Accommodation will be considered as a component part of achieving an appropriate mix of housing, however, a proliferation of either housing tenure in any one area shall be avoided. If Government guidance in relation to Shared Accommodation or any other matter is updated between now and the next stage of the Plan making process, considerations will be had of the impact of those changes on the Plan in the Report brought to Council.”</i></p> <p>To:</p> <p><i>“Policy Objective PHP27: Build-to Rent and Shared Accommodation/Co-living Developments It is a Policy Objective to facilitate the provision of Build-to-Rent <del>and Shared Accommodation</del> in suitable locations across the County and accord with the provisions of ‘Sustainable Urban Housing: Design Standards for New Apartments’, 2018<del>20</del> (and any amendment thereof). Proliferation of <del>these housing types</del> <u>Build to rent</u> should be avoided in any one area. <u>As the HNDA does not support provision of shared accommodation there shall be a presumption against granting planning permission for shared accommodation/co-living development.</u></i></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><i>Provision of ‘Build-to-let’ accommodation was first introduced in 2015 under the provisions of the ‘Sustainable Urban Housing: Design Standards for New Apartments’. The amended Apartment Guidelines issued in 2018 expanded upon the ‘new’ housing tenure typologies by introducing Specific Planning Policy Requirements (SPPR’s) for Build-To Rent (SPPR 7 and 8) and Shared Accommodation (SPPR 9). Both housing tenures offer centrally managed rental options to the market and add to the mix of accommodation that could be provided for in certain areas. <u>Subsequent guidance in December 2020 updated the Apartment Guidelines by way of a different SPPR which states that</u></i></p> <p><u>There shall be a presumption against granting planning permission for shared accommodation/co-living development unless the proposed development is either:-</u></p> <ul style="list-style-type: none"> <li>(i) <u>required to meet specific demand identified by a local planning authority further to a Housing Need and Demand Assessment (HNDA) process; or,</u></li> <li>(ii) <u>on the date of publication of these updated Guidelines, a valid planning application to a planning authority, appeal to An Bord Pleanála, or strategic housing development (SHD) planning application to An Bord Pleanála, in which case the application or appeal may be determined on its merits.</u></li> </ul> <p><u>The HNDA (See Appendix 2) has not identified any specific demand for shared living accommodation, there is, therefore a presumption against provision of same.</u></p> <p><i>Build-to-rent (BTR) accommodation will be facilitated at appropriate locations across the County. BTR accommodation shall be provided in accordance with land use zoning objectives. For the avoidance of doubt, BTR is:</i></p> <ul style="list-style-type: none"> <li>• <i>permitted in principle in areas zoned objective MTC (major town centre) and DC (district centre)</i></li> <li>• <i>open for consideration in areas zoned objective NC (subject to retaining an appropriate mix of uses), A, A1, and A2.</i></li> </ul> <p><del><u>Shared Accommodation shall only be provided in accordance with land use zoning objectives, in either areas zoned objective MTC (Major Town Centre) or DC (District Centre). Both BTR and Shared Accommodation shall be located within a 10-minute walking time from high frequency public transport routes. BTR and Shared Accommodation will be considered as a component part of achieving an appropriate mix of housing, however, a proliferation of Build to Rent either housing tenure in any one area shall be avoided. If Government guidance in relation to Shared Accommodation or any other matter is updated between now and the next stage of the</u></del></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><del><i>Plan making process, considerations will be had of the impact of those changes on the Plan in the Report brought to Council.</i></del></p> <p>In Chapter 12 amend Section 12.3.3.1 ‘Residential Mix’ by adding the following sentence to the end of the section:</p> <p><i>“For the avoidance of doubt, this section will not apply to BTR only developments.”</i></p> <p>Amend Section 12.3.5.5 ‘Minimum Apartment Floor Areas’ (p.237) to add a footnote to <i>“by a minimum of 10%”</i> as follows:</p> <p><i>“*Not applicable to BTR development in accordance with SPPR 8.”</i></p> <p>Amend Section 12.3.5.6 ‘Additional Apartment Design Requirements’ (p.237) to add a footnote to <i>“12 apartments per floor per core”</i> as follows:</p> <p><i>“*Not applicable to BTR development in accordance with SPPR 8.”</i></p> <p>Omit section 12.3.7 ‘Shared Accommodation’, p 238 - 239 in its entirety.</p> <p>Amend 12.4.5.6 ‘Residential Parking’ to omit:</p> <p><del><i>A lower car parking standard may be acceptable for Shared Living having regard to the assessment criteria for parking provision and location in terms of parking zones as set out above.</i></del></p> <p>In Chapter 13 omit all occurrences of ‘Shared Accommodation’ in land use tables.</p> <p>Amend Appendix 2: ‘Housing Strategy and Housing Need Demand Assessment’ having regard to any requirement of shared accommodation in the County (refer to section 3.13 and Section 3.17 Appendix 2 in this report for a detailed response in this regard).</p> <p>Amend Appendix 3: ‘Development Management Thresholds’ as follows to omit <i>“Section 12.3.7 Shared Accommodation”</i> from thresholds table.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>Amend Appendix 13: “Policy Context” as follows:</p> <p>p.332 - Amend list of Government Departments to take account of all/any new and superseded titles.</p> <p>Section 13.7 ‘Guidelines for Planning Authorities’ (p.347) from  <i>“DHPLG (2018) Sustainable Urban Housing, Design Standards for New Apartments: Guidelines for Planning Authorities”</i></p> <p>To</p> <p><i>“DHPLGH (201820) Sustainable Urban Housing, Design Standards for New Apartments: Guidelines for Planning Authorities”</i> and update weblink.</p> <p>Amend Appendix 14: “Statement Demonstrating Compliance with Section 28 Guidelines” as follows:</p> <p>Table 1 (p.364) from:  <i>“DHPLG (2018) Sustainable Urban Housing, Design Standards for New Apartments: Guidelines for Planning Authorities”</i></p> <p>To:</p> <p><i>“DHPLGH (201820) Sustainable Urban Housing, Design Standards for New Apartments: Guidelines for Planning Authorities”</i></p> <p>Table 2, omit the following on page 368:  <del><i>SPPR 9: Shared Accommodation may be provided and shall be subject to the requirements of SPPRs 7 (as per BTR). In addition, (i) No restrictions on dwelling mix shall apply; (ii) The overall unit, floor area and bedroom floorspace requirements of Appendix 1 of these Guidelines shall not apply and are replaced by Tables 5a and 5b; (iii) Flexibility shall be applied in relation to the provision of all storage and amenity space as set out in Appendix 1, on the basis of the provision of alternative, compensatory communal support facilities and amenities. The</i></del></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><del><i>obligation will be on the project proposer to demonstrate the overall quality of the facilities provided and that residents will enjoy an enhanced overall standard of amenity; (iv) A default policy of minimal car parking provision shall apply on the basis of shared accommodation development being more suitable for central locations and/or proximity to public transport services. The requirement for shared accommodation to have a strong central management regime is intended to contribute to the capacity to establish and operate shared mobility measures”.</i></del></p> <p>Replace with the following:</p> <p><i>“Specific Planning Policy Requirement 9 There shall be a presumption against granting planning permission for shared accommodation/co-living development unless the proposed development is either:- (i) required to meet specific demand identified by a local planning authority further to a Housing Need and Demand Assessment (HNDA) process; or, (ii) on the date of publication of these updated Guidelines, a valid planning application to a planning authority, appeal to An Bord Pleanála, or strategic housing development (SHD) planning application to An Bord Pleanála, in which case the application or appeal may be determined on its merits”.</i></p> <p>Omit:</p> <p><del><i>Section 12.3.7 sets out requirements in relation to Shared Living. This complies with SPPR 9</i></del></p> <p>Replace With:</p> <p><i>“Section 4.2.3.2 sets out policy in relation to Shared Living. This complies with SPPR 9”.</i></p>
<b>3.4.5.4: Policy Objective PHP28: Provision of Student Accommodation</b>			
<p>i) Submission requests that a density requirement for student accommodation is provided.</p>	<p><b>B0529</b> <b><u>B1134</u></b></p>		<p>The Executive notes but respectfully disagrees with the issue raised.</p> <p>The provision of student accommodation is based on bed spaces rather than the number of units. Density is based upon the number of residential units per hectare and is not calculated using bed spaces. In this regard, it would not be appropriate to apply a density parameter for student accommodation.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>Standards for purpose built student accommodation are currently governed by:</p> <ul style="list-style-type: none"> <li>the Department of Education and Science ‘Guidelines on Residential Development for Third Level Students’ (1999), the subsequent supplementary document (2005),</li> <li>the ‘National Student Accommodation Strategy’ (2017).</li> </ul> <p>The Draft Plan provides guidance with regard to the location and design of purpose built student accommodation in Section 12.3.8.12 ‘Student Accommodation.’</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.4.5.5: Policy Objective PHP29: Housing for All</b>			
<p>i) A number of submissions were received in relation to housing for all in support and noting:</p> <ul style="list-style-type: none"> <li>Housing for all requires applying higher standards</li> <li>Locating nursing homes and assisted living spaces within urban centres should also be a goal of the plan.</li> <li>Housing for all and age friendly housing are particularly relevant in Dundrum given the local age profile</li> <li>That the provision of suitable housing to facilitate downsizing in existing older/established neighbourhoods should be pursued.</li> <li>Smaller, single storey, owner occupied developments would enable residents continue independent living, in familiar neighbourhoods, while freeing up larger homes for growing families</li> <li>the potential provision of older persons accommodation at Mount Annville, specifically for an increasing number of retiring sisters</li> </ul>	<p><b><u>B0271</u></b> <b><u>B0334</u></b> <b><u>B0905</u></b> <b><u>B0910</u></b> <b><u>B0942</u></b> <b><u>B1125</u></b></p>		<p>The Executive notes the issues raised and welcomes the support provided.</p> <p>The Draft Plan supports the provision of a range of housing options for all residents of the County. Section 4.3.2 ‘Housing Choice’ in the Draft Plan sets out a suite of Policy Objective aimed at achieving a mix of housing types, sizes and tenures ensuring that there is a variety of housing options provided, including providing opportunities for older residents to downsize or ‘right size’ within their community, and support the provision of purpose built accommodation for persons with a disability or mental health issue.</p> <p>Policy Objective PHP29: ‘Housing for All’ specifically supports “housing options for older people and persons with disabilities/mental health issues”, provision of purpose built accommodation and promotes ‘aging in place’. PHP9 notes the importance of location to these housing options and places an emphasis on being located within existing residential areas well served by social and community infrastructure and proximity to public transport. PHP29 also references specific design requirements that may need to be considered. The provision of housing for all does not necessarily need to be provided in single storey structures as suggested, rather there may be a range of suitable design options including 2+ storey developments that incorporate accessibility options between upper and lower floors.</p> <p>The provision of housing for all would be considered an important component of the overall housing mix for the County particularly given the demographics of the County with a higher than average age profile. Specific housing options for older people is promoted in Policy Objective PHP26: ‘Housing Mix’ as are ‘lifetime adaptable’ homes.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<ul style="list-style-type: none"> <li>It is an Important objective that will hopefully be linked to PHP26.</li> </ul>			<p>In addition, Section 12.3.3.1 ‘Residential Size and Mix’ in Chapter 12 of the Draft Plan, requires application received to submit: <i>“A statement outlining how the scheme has been designed for the needs of older people or persons with a disability...”</i>. It is noted that there is a minor typographical error in this section that should be amended.</p> <p>In formulating this response, the Executive have in accordance with section 12 (8) (b) (iii) of the Planning and Development Act, 2000, (as amended) taken account of the strategic direction received from the members at pre-draft stage <i>“That the Chief Executive ensures that inclusivity as a theme permeates through relevant policies of the Draft Plan”</i>.</p> <p><b>Recommendation</b> Amend the last bullet of Section 12.3.3.1 ‘Residential Size and Mix’ in Chapter 12 (p.232) from:</p> <ul style="list-style-type: none"> <li><i>“A statement outlining how the scheme has been designed for the needs of older people/ or persons with a disability and or lifetime homes.”</i></li> </ul> <p>To:</p> <ul style="list-style-type: none"> <li><i>“A statement outlining how the scheme has been designed for the needs of older people <u>and/or</u> persons with a disability <u>and/or</u> lifetime homes.”</i></li> </ul>
<p>ii) Submission request the developments of sheltered housing schemes for older adults.</p>	<p><b>B0724</b></p>		<p>The Executive notes the issue raised.</p> <p>The Draft Plan contains Policy Objectives in Chapter 4 that support and encourage a mix of housing types and ‘housing for all’, including housing for older persons, under Policy Objectives:</p> <ul style="list-style-type: none"> <li>PHP:25: Implementation of the Housing Strategy</li> <li>PHP26: Housing Mix</li> <li>PHP29: Housing for All.</li> </ul> <p>The Draft Plan sets out details with regard to specific housing needs, including for older persons in Section 2.6 of the Appendix 2: ‘Housing Strategy and Interim HNDA’. Section 2.6.3 ‘Disabled Persons’ in Appendix 2 states that the DLR ‘Housing and Disability Strategic Plan’</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>specifies that 5% of the social housing programme will be dedicated to the needs of older persons and persons with disabilities.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submission seeks the inclusion of targets for social housing for people with disabilities and the building of housing that takes account of all four pillars of disability.</p>	<b>B1075</b>		<p>The Executive notes the issue raised.</p> <p>The Draft Plan sets out details with regard to specific housing needs, including for disabled persons in Section 2.6 of the Appendix 2: 'Housing Strategy and Interim HNDA'. Section 2.6.3 'Disabled Persons' in Appendix 2 states that the DLR 'Housing and Disability Strategic Plan' specifies that 5% of the social housing programme will be dedicated to the needs of older persons and persons with disabilities.</p> <p>The Draft Plan also contains Policy Objectives in Chapter 4 that support and encourage a mix of housing types and housing for all under Policy Objectives:</p> <ul style="list-style-type: none"> <li>• PHP25: Implementation of the Housing Strategy</li> <li>• PHP26: Housing Mix</li> <li>• PHP29: Housing for All.</li> </ul> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.4.5.6: Policy Objective PHP30: Provision of Social Housing</b>			
<p>i) Submission request that the Plan states the need for arrangements for formal inter-agency agreements to facilitate supported housing for older dependant people and people with disabilities, to ensure an integrated approach between DLR and the HSE.</p>	<b>B0271</b>		<p>The Executive notes the issue raised.</p> <p><b>Specific details with regard to the type of social housing provided and the agencies involved in its delivery is not a Development Plan matter</b>, rather this will be determined by the Housing Department. The Council works in partnership with several AHBs to deliver homes for older people and persons with a disability, through the Capital Assistance Scheme.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission requests the Council use all appropriate public land available to build public and affordable</p>	<b>B0079</b> <b>B0657</b>	1	<p>The Executive notes the issue raised.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>housing to rent and buy including land at the former Central Mental Hospital in Dundrum which the Land Development Agency (LDA) currently plans to develop. The LDA model cannot deliver the level of public and affordable units that is required.</p> <p>Submission notes that there is a need for more public investment in the provision of housing.</p>			<p>The delivery of social housing is achieved through a number of ways, including the building of units on publicly owned lands either through direct build or in collaboration with an Approved Housing Body or the Land Development Agency (LDA). <b>Funding for the provision of housing is not a County Development Plan matter.</b></p> <p>The Council will work with the LDA in the delivery of residential units on the Central Mental Hospital lands to ensure that an appropriate mix of unit tenure is provided for.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submission requests the Council to pursue Horse Racing Ireland to hand over unused land at Leopardstown Racecourse that is zoned residential and has the potential for up to 450 units for public and affordable housing to rent and buy.</p>	<b>B0079</b>	9	<p>The Executive notes the issue raised.</p> <p>The lands in question are in private ownership, in this instance, they are owned by Horse Racing Ireland (HRI). In 2018 the Council sought to place these lands onto its Vacant Site Register (Reg. Ref. VS-0001). Following an appeal by HRI, An Bord Pleanála concluded that these lands were not vacant in accordance with section 9(5) of the Urban Regeneration and Housing Act 2015.</p> <p>In the event that these lands are developed for housing, the applicant will be required to comply with the requirements of Part V of the Planning and Development Act, 2000 (as amended) and provide 10% social housing units.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) The Council should develop the Mount Anville site in its entirety for public and affordable housing to rent and buy.</p>	<b>B0079</b>	2	<p>The Executive notes the issue raised</p> <p>The lands at the former depot site at Mount Anville Road are in the ownership of the Council and are zoned Objective 'A' – "To provide residential development and/or protect and improve residential amenity".</p> <p>As per Table 13.1.2 in Section 13.1 'Land Use Zoning Objectives' (page 305), 'residential' development is 'permitted in principle' within this land use zoning. This land use zoning objective does not restrict the housing tenure that may be permitted within this site.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>Policy Objective PHP26: 'Housing Mix' in the Draft Plan states:  <i>"It is a Policy Objective to encourage the establishment of sustainable residential communities by ensuring that a wide variety of housing and apartment types, sizes and tenures is provided throughout the County in accordance with the provisions of the Housing Strategy and Interim Housing Need Demand Assessment (HNDA) and any future Regional HNDA".</i></p> <p>Policy Objective PHP30: 'Provision of Social Housing' in the Draft Plan states:  <i>"It is a Policy Objective to promote the provision of social housing in accordance with the Council's Housing Strategy and Government policy as outlined in the DoHPLG 'Social Housing Strategy 2020'."</i></p> <p>To restrict the housing tenure within a specific site would be contrary to the Policy Objective on housing mix.</p> <p><b>Recommendation</b>  No change to Draft Plan.</p>
<b>3.4.5.7: Policy Objective PHP32: Traveller Accommodation</b>			
<p>i) Submissions received with regard to Travellers accommodation request:</p> <ul style="list-style-type: none"> <li>• That an objective should be removed from the social housing development in Belarmine.</li> <li>• that Traveller accommodation policy removes local connection requirements</li> <li>• that higher standard accommodation is provided.</li> </ul>	<p><b><u>B0061</u></b>  <b><u>B0334</u></b>  <b><u>B0435</u></b></p>	<p>9</p>	<p>The Executive notes the issues raised.</p> <p>The locations, delivery and specific requirements of Traveller accommodation across the County are determined by and set out within the Council's 'Traveller Accommodation Programme 2019-2024' (TAP). Policy Objective PHP32: 'Traveller Accommodation' in the Draft Plan provides policy support for the implementation of the TAP.</p> <p><b>Recommendation</b>  No change to Draft Plan.</p>
<b>3.4.5.8: Policy Objective PHP33: Provision of Refuges</b>			
<p>i) Submissions received with regard to refuges request:</p> <ul style="list-style-type: none"> <li>• That additional refuges are provided including those for men and juniors.</li> </ul>	<p><b><u>B0334</u></b></p>		<p>The Executive notes the issues raised.</p> <p>Tusla, the Child and Family Agency, are the primary statutory agency for the provision of domestic violence related services including domestic Violence refuges and Safe Home services. DLR has ongoing engagement with Tusla's Domestic, Sexual and Gender Based</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<ul style="list-style-type: none"> <li>• That safe houses are provided for those who do not qualify for a refuge.</li> <li>• That high support units are provided for people with certain care needs.</li> </ul>			<p>Violent Services. Tusla advise that they support Sonas, a provider of domestic violence services across Dublin, which currently provides a dedicated Outreach Support Worker and individual Safe Home accommodation units in Dún Laoghaire-Rathdown.</p> <p>Provision was made in the Council’s Budget in 2021 for the Community and Cultural Development Department to undertake a Feasibility Study to establish the need for the provision of a domestic violence refuge in the County. Tusla is also undertaking a strategic review of emergency accommodation nationwide. Council will continue to engage with Tusla with regard to the outcomes of this accommodation review.</p> <p>Policy Objective PHP33: ‘Provision of Refuges’ supports the provision of refuges in the County.</p> <p>It is noted that while the title and main Policy Objective text simply refers to ‘refuges’, the body text of PHP33 does refer to ‘women’s and family refuges’. It is considered reasonable to amend this wording to omit any reference to any particular refuge.</p> <p>In formulating this response the Executive have in accordance with section 12 (8) (b) (iii) of the Planning and Development Act, 2000, (as amended) taken account of the strategic direction received from the members at pre-draft stage <i>“That the Chief Executive ensures that inclusivity as a theme permeates through relevant policies of the Draft Plan”</i>.</p> <p><b>Recommendation</b> Amend Policy Objective PHP33: ‘Provision of Refuges’ from:</p> <p><i>“It is an objective of the Plan to support the facilitation of the provision of women’s and family refuges ...”</i></p> <p>To:</p> <p><i>“It is an objective of the Plan to support the facilitation of the provision of <del>women’s and family refuges</del> and safe home accommodation...”</i></p>
<b>3.4.6: Quality Design &amp; Placemaking</b>			
<b>3.4.6.1: Policy Objective PHP34: Healthy Placemaking</b>			

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>i) Submission welcomes the emphasis placed on placemaking, however:</p> <ul style="list-style-type: none"> <li>• Raises concern there is limited account of the needs of children and families requests that this issue is given a distinct heading in Chapter 4 referencing the specific needs of this group.</li> <li>• Proposals for urban design and placemaking, movement, social and community facilities, open space and recreation, should be drawn together under one heading in Chapter 4 as well as appearing in the relevant sections of the Plans</li> <li>• Plan should be amended to emphasise that Placemaking is something that the Council does with people and not for people. Propose that the following definition (or similar) is included at Section 4.4 Place, page 92: ‘Placemaking is the process through which we work together to shape our public spaces. Rooted in community-based participation, Placemaking involves the planning, design, management and programming of shared use spaces.’ (rethinkurban.com/placemaking).</li> </ul>	<p><b>B0271</b></p>		<p>The Executive notes the issues raised and welcomes the support provided.</p> <p>The Draft Plan has been prepared having regard to the needs of all who live in, work in or visit the County regardless of age or ability. Section 1.7 ‘Development Plan Vision’ of the Draft Plan states that <i>“the Vision for Dún Laoghaire-Rathdown is to embrace inclusiveness, champion quality of life through healthy placemaking, grow and attract a diverse innovative economy and deliver this in a manner that enhances our environment for future generations”</i>. In order to deliver on this vision, the Draft Plan includes 5no. Strategic County Outcomes (SCO’s), including SCO no.4: “Creation of an Inclusive and Healthy County”.</p> <p>Chapter 4 in particular contains a suite of Policy Objectives aimed at creating and improving inclusive, healthy neighbourhoods / communities. Of particular note in this regard is Policy Objective PHP13: ‘Equality, Social Inclusion and Participation’ which states:</p> <p>“It is a Policy Objective to promote equality and progressively reduce all forms of social exclusion that can be experienced because of gender, gender identity, marital status, family status, age, race, religion, disability, sexual orientation, nationality, homelessness and membership of the Traveller Community and promote active participation consistent with RPO 9.1 and RPO 9.2 of the RSES.”</p> <p>The vision for an inclusive County and healthy County is further promoted in Section 4.4 ‘Place’ where healthy placemaking, the creation of safe, accessible spaces and social interaction are all promoted. While not explicitly referenced, the needs of children, families and indeed older persons, are all part of the ‘inclusivity’ promoted within the Policy Objectives of the Draft Plan. In order to bolster inclusivity in Section 4.4, additional references with regard to placemaking and urban design having regard to all ages and abilities will be added.</p> <p>With regard to the suggested definition of placemaking, it is noted that Section 4.4 ‘Place’ does not only refer to works by the Council, rather the Policy Objectives within this section of the Draft Plan refer to any development. It is important to note that it is not always feasible for private developers to work with communities, however, where appropriate, this can be encouraged.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>In formulating this response, the Executive have in accordance with section 12 (8) (b) (iii) of the Planning and Development Act, 2000, (as amended) taken account of the strategic direction received from the members at pre-draft stage <i>“That the Chief Executive ensures that inclusivity as a theme permeates through relevant policies of the Draft Plan”</i>.</p> <p><b>Recommendation</b>  Amend Section 4.4.1 ‘Quality Design &amp; Placemaking’ (p.93) as follows:</p> <p><i>Amend paragraph 1 from: “Placemaking is supported through high quality urban design, aimed at supporting and creating vibrant, distinctive, safe and accessible public spaces which promotes and facilitates social interaction. In this regard, good placemaking is a key component to promoting the creation and maintenance of sustainable residential communities. High quality design of all housing options also supports the creation of quality public spaces. High quality and inclusive urban design will aid in creating healthy, attractive and accessible places to live for all residents, employees and visitors and to the County”</i></p> <p>To:</p> <p><i>“Placemaking is supported through high quality urban design, aimed at supporting and creating vibrant, distinctive, safe and accessible public spaces <u>for all ages and abilities</u> which promotes and facilitates social interaction. In this regard, good placemaking is a key component to promoting the creation and maintenance of sustainable residential communities. High quality design of all housing options also supports the creation of quality public spaces. High quality and inclusive urban design, <u>that takes account of all age groups and abilities</u>, will aid in creating healthy, attractive and accessible places to live for all residents, employees and visitors and to the County.”</i></p> <p>Amend last sentence to the end of paragraph 2 from: <i>“The Council is committed to ensuring that good urban design principles are applied in the design and planning of existing and new development areas”</i>.</p> <p>To:</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><i>“The Council is committed to ensuring that good urban design principles are applied in the design and planning of existing and new development areas <u>and will encourage engagement with local communities where appropriate in this regard.</u>”</i></p> <p><i>Amend sentence 1 of first paragraph under Policy Objective PHP34: ‘Healthy Placemaking’ from: “The principles for creating healthy and attractive places include good urban design, providing residents with suitable public spaces that encourage walking and cycling, good accessibility to sustainable neighbourhood infrastructure and employment, provision and access to high quality open spaces and recreation”.</i></p> <p><i>To:</i></p> <p><i>“The principles for creating healthy and attractive places include good urban design, providing residents <u>of all ages and abilities</u> with suitable public spaces that encourage walking and cycling, good accessibility to sustainable neighbourhood infrastructure and employment, provision and access to high quality open spaces and recreation.”</i></p>
<p>ii) Request identification and prioritisation of place making plans and projects within the development plan</p>	<p><b><u>B1095</u></b></p>		<p>The Executive notes the issue raised.</p> <p>The identification or prioritisation of placemaking plans or indeed public realm improvement schemes is not a County Development Plan matter, that this is an operational issue.</p> <p>The Draft Plan does, however, include a Local Area Plan Programme in Section 2.6.1.3 of Chapter 2 and Policy Objective PHP40: ‘Design in Local Area Plans’ in Chapter 4 states: <i>“It is a Policy Objective to use the vehicle of Local Area Plans and/or Urban Framework Plans that form part of the County Development Plan, to promote and embed the principles of good urban design in the delivery of new, and existing, sustainable communities in specific areas of the County”.</i></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Development should respect local, streetscape, villages character in terms of style and building heights and balance development with the need for public spaces.</p>	<p><b><u>B1164</u></b></p>		<p>The Executive notes and agrees with the sentiment of the issue raised.</p> <p>The Draft Plan includes Policy Objectives in Section 4.4 ‘Place’, aimed at promoting high quality design and healthy placemaking including Policy Objectives:</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<ul style="list-style-type: none"> <li>• PHP34: 'Healthy Placemaking' which includes that it is an objective to "Ensure that development proposals are cognisant of the need for proper consideration of context, connectivity, inclusivity, variety, efficiency, distinctiveness, layout, public realm, adaptability, privacy and amenity, parking, wayfinding and detailed design"</li> <li>• PHP36: 'Public Realm Design' which states "It is a Policy Objective that all development proposals, whether in established areas or in new growth nodes, should contribute positively to an enhanced public realm and should demonstrate that the highest quality in public realm design is achieved".</li> <li>• PHP39: 'Building Design &amp; Height' which states that "The Council will actively promote high quality design in all development across the County."</li> </ul> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.4.6.2: Policy Objective PHP36: Public Realm Design</b>			
i) The submissions request specific public realm studies and development: <ul style="list-style-type: none"> <li>• Within the Sallynoggin area</li> <li>• Sandycove/Glasthule</li> </ul>	<u>B0326</u> <u>B0949</u>	7	The Executive notes the issues raised. <b>The roll out of specific public realm improvement projects or studies is not a County Development Plan matter, rather this is an operational matter.</b> The Council is currently progressing a number of public realm improvements schemes across the County. <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.4.6.3: Policy Objective PHP38: Safer Living Environment</b>			
i) Submission states that the promotion of natural surveillance is important, in this regard, large enclosed gates to private properties should be actively discouraged	<u>B0015</u>		The Executive notes the issue raised. <p>Policy Objective PHP38: 'Safer Living Environment' promotes "natural and passive surveillance within the public realm, public walkways and open spaces by encouraging supervised people-centred activities in these areas".</p> <p>The provision of gates to domestic properties is a development management matter and are often exempted development under the provisions of the Planning and Development</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>Regulations, 2001 (as amended) resulting in the design being outside of the control of the Planning Authority.</p> <p>The creation of new vehicular entrances and their associated gates, however, is assessed under the provisions of Section 12.4.8 'Vehicular Entrances and Hardstanding Areas'.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.4.6.4: Policy Objective PHP39: Building Design and Height</b>			
<p>i) Submission does not agree with high rise buildings – there is no need for any housing to be more than 2/3 levels high. Anything higher than this will infringe and be detrimental to the natural beauty of the area.</p>	<b><u>B0737</u></b>		<p>The Executive notes, but respectfully disagrees with the issue raised.</p> <p>There is a place for taller building in appropriate locations across the County. Appendix 5: 'Building Height Strategy' of the Draft Plan identifies areas in the County where increased height would be supported and contains Policy Objectives aimed at guiding building height in certain locations. Appendix 5 also sets out a performance based criterion to ensure protection of unique amenities whilst also permitting increased building height.</p> <p>To restrict building height to 2/3 storeys would seriously limit the potential to deliver upon the National and Regional objectives of compact growth in existing urban areas.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submissions considers that:</p> <ul style="list-style-type: none"> <li>• The design and form of buildings should be in keeping with the rural environment.</li> <li>• The County Development Plan should specify building finishes, which should include local granite finishes.</li> <li>• This should be stipulated for all building finishes including walls in the Map 9 area/Kiltiernan LAP.</li> <li>• Development in Kiltiernan village must resist any attempt at strip mall construction.</li> </ul>	<b><u>B1199</u></b> <b><u>B0475</u></b>	9	<p>The Executive notes the issue raised.</p> <p>Policy objective PHP39: 'Building Height and Design' encourages high quality design of in all new development. This is supplemented by development management guidance set out in Section 12.3.1.1 'Design Criteria' in Chapter 12 of the Draft Plan. Section 12.3.1.1 requires that 'context' is taken into account in assessing new development and this criteria states:</p> <p><i>"context – having regard to the setting of the site, the surrounding character, streetscape, and the impact of any proposed development on the development potential of adjoining sites."</i></p> <p>With regard to one-off housing in the countryside, design criteria is set out in Section 12.3.11.2 'Design' which states: <i>"The Planning Authority will not insist on the use of particular</i></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><i>architectural styles but will generally expect visually similar / sympathetic appearance in areas where there is an accepted vernacular.”</i></p> <p>By limiting finishes of new buildings to one particular material would place an onerous requirement on an applicant, particularly if such a material was no longer be in production or place a significant financial burden on a project when alternative suitable finishes could achieve a finish that has due regard to the site context.</p> <p>It is noted that there is no specific reference between policy PHP39 and section 12.3.1.1 ‘Design Criteria’ in Chapter 12. It is therefore considered appropriate to provide such a reference.</p> <p><b>Recommendation</b>  Amend paragraph 1 of Policy Objective PHP39: ‘Building Height and Design’ by adding new text to the end as follows:  <i>“(Refer also to Chapter 12, Section 12.3.1.1 ‘Design Criteria’).”</i></p>

### 3.5: Chapter 5 - Transport and Mobility

It should be noted that where something is identified as an Operational issue/Not a County Development Plan issue in the Chief Executive's response, this does not mean that the Executive does not support the sentiments of the issues raised or that the Draft Plan limits or precludes delivery of the operational service identified.

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<b>3.5.1: Integrated Land Use and Transport</b>			
<b>3.5.1.1: Policy Objective T1: Integration of Land Use and Transport Policy</b>			
i) Submissions: <ul style="list-style-type: none"> <li>Consider that Land use planning and transport should be integrated.</li> <li>Welcome the proposed use of ABTAs.</li> </ul>	<u>B0627</u> <u>B0752</u> <u>B0967</u>		The Executive agrees with the issues raised. Section 5.3.1 Policy Objective T1: Integration of Land Use and Transport Policy sets out policy in this regard. Support for use of ABTAs is welcomed.  <b>Recommendation</b> No change to Draft Plan.
<b>3.5.1.2: Policy Objective T2: Delivery of Enabling Transport Infrastructure</b>			
i) Submission considers that the new DART stop at Woodbrook will add to journey times between Dublin and Bray and will impede any proposed rail services between Dublin and the South East.	<u>B0006</u>	14	The Executive notes the issue raised.  Whilst the new DART station will add marginally to journey duration from Dublin to Bray, it is a piece of enabling infrastructure required to facilitate the development of Woodbrook-Shanganagh and Old Connaught and is essential for sustainable travel patterns. This is in accordance with the Core Strategy of the Draft Plan and the Dublin Metropolitan Area Strategic Plan. The provision of this DART station also accords with the NTA's Transport Strategy for the GDA. The DART+ Programme has been launched to address issues of service frequency. It should be noted that the Council is not a provider of public transport services.  <b>Recommendation</b> No change to Draft Plan.
ii) Submission request that the roads and traffic management measures set out in the NTA Bray and Environs Study are subject to further evaluations to ensure that they do not have a negative impact on the strategic function of the national road network, especially the new road link from the M50	<u>B0192</u>	10 14	The Executive notes the issue raised by the TII and notes that the NTA have also raised this issue.  A response is set out in Section 2.3 above which recommends that Section 5.3.2 Policy Objective T2: Delivery of Enabling Transport Infrastructure of the Draft Plan is amended. The TII have also requested that Table 5.3 and table 5.4 be amended to address this issue.

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
Cherrywood Interchange to Rathmichael, Ferndale Road to Dublin Road and Shanganagh link road.			<p>It is considered appropriate to amend table 5.3 with similar text. It is considered that table 5.4 does not require amendment as the projects from the Bray and Environs Transport Study are all listed in table 5.3.</p> <p><b>Recommendation</b> Amend table 5.3.3.2 (page 111) of the Plan as follows by adding the following text as a footnote to the following roads - M50 Cherrywood interchange to Rathmichael – new link road, Ferndale Road and Link from Ferndale Road to Dublin Road:</p> <p><i>"The inclusion of these proposals is dependent on further assessment as set out in; the 'Spatial Planning and National Roads Guidelines for Planning Authorities' in particular Section 2.7 and Section 5.8.3 Principles of Road Development, feasibility and environmental assessment of the NTA Transport Strategy for the Greater Dublin Area 2016 -2040 and the forthcoming Transport Strategy for the Greater Dublin Area; and demonstration of their compatibility with the strategic function of the national road network as set out in Sections 2.2 of the Bray and Environs Transport Study (2019)."</i></p>
<p>iii) In terms of Old Connaught/Rathmichael, the following issues are raised:</p> <ul style="list-style-type: none"> <li>Concerns with roads in Old Connaught area not being of a sufficient standard to support the proposed level of population and also being used as a rat run.</li> <li>Local roads need to be upgraded but should be done in a manner to preserve their unique rural characteristics and footpaths are required.</li> <li>A vehicular bridge across the County Brook and an additional motorway crossing point north of the LAP lands would be welcomed.</li> <li>The proposed road from Cherrywood to Rathmichael will increase traffic and cause 'rat runs' endangering vulnerable road users.</li> </ul>	<p><b>B0450</b> <b>B1003</b></p>	<p>10 14</p>	<p>The Executive notes the issues raised.</p> <p>The Draft Plan has included the enabling transport infrastructure set out in the NTA's Bray and Environs Transport Study 2019 as required for the Old Connaught area. This study was agreed jointly by the NTA, TII, Wicklow and Dún Laoghaire-Rathdown County Councils.</p> <p>The detail is being further refined by an Area Based Transport Assessment which is underway in tandem with the preparation of a Local Area Plan (LAP) for Old Connaught.</p> <p>See also response in Chapter 14 (Map 14).</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>iv) Submissions relate to the Bray and Environs Transport Study (BETS) as follows:</p>	<p><b>B0967</b> <b>B1155</b></p>	<p>10 14</p>	<p>The Executive notes the issues raised and acknowledges that the routes have not been shown on maps of the Draft Plan as the final routes are not yet known.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> <li>Roads are listed in Table 5.3 but are not carried through to the Land Use Zoning Map therefore the impact of the route of these roads is unclear.</li> <li>Welcome content of BETS.</li> <li>Bridge over M11 is in BETS but is not on Map 14 as an SLO or in Table 5.3.</li> <li>The construction of a new road over the M11 motorway linking lands would protect the unique rural character of Ferndale Rd by providing an alternative to the upgrade of the Ferndale and Rathmichael roads.</li> </ul>			<p>The Draft Plan has included the enabling transport infrastructure set out in the NTA's 'Bray and Environs Transport Study 2019' required for the Old Connaught area in Section 5.3.2 (page 102 and in Table 5.3 page 111). The detail is being further refined by an Area Based Transport Assessment which is underway in tandem with the preparation of a Local Area Plan (LAP) for Old Connaught.</p> <p>Policy Objective T24: Environmental Assessment of New Roads is also relevant to this issue as it requires new roads proposed in Section 5.7 (which are not provided for in existing plans/programmes/previously permitted) shall go through a feasibility assessment which includes environmental sensitivities set out in the SEA. The footnote to table 5.3 as recommended above is also of relevance.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>v) TII recommends that a more detailed and collaborative assessment and plan be prepared for lands at racecourse South by the planning authority which will avoid undermining of the safe and efficient operation of the national road and light rail networks and in turn; deliver a new sustainable community. Such an assessment should be carried in accordance with Area Based Transport Assessment (ABTA) Guidance Notes (2018, TII publication PE-PDV-02046).</p>	<b>B0192</b>	9	<p>The Executive notes the issue raised. This issue has been addressed in Section 2.1.12 above.</p> <p>Development proposed in the vicinity of Junction 14 and junction 15 will be sustainable plan led compact urban development on lands identified in the MASP as strategic growth corridors, will be located in Dublin City and Suburbs, adjacent to and including the strategic employment node of Sandyford and will all be well served by existing and planned public transport.</p> <p>The Planning Authority have consulted with both the NTA and the TII with regard to this issue.</p> <p>With regard to the Racecourse South lands and to address the concerns set out it is considered appropriate to carry out an Area Based Traffic Assessment in accordance with Area Based Transport Assessment (ABTA) Guidance Notes (2018, TII publication PE-PDV-02046). An SLO has been proposed in this regard for Map 9 on foot of the response to <b>Recommendation</b> no 8 of the OPR.</p> <p>Traffic and Transport Assessment (TTAs) will also continue to be used at planning application stage to assess impact of any development on existing road network which would include any National Roads and junctions.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>vi) Submission notes that the Draft Plan has omitted the Woodbrook Strategic Park and Ride although this is one of the recommendations of the Bray and Environs Transport Study (BETS) and is to be delivered in 2019 -2027.</p>	<p><b>B0633</b></p>	<p>14</p>	<p><b>Add a new specific local objective to Map 9 as set out in Section 2.1. above.</b></p> <p>The Executive notes the issue raised.</p> <p>The Draft Plan has not omitted the Woodbrook Park and Ride. It is referred to in Section 5.3.2 Policy Objective T2: Delivery of Enabling Transport Infrastructure (page 102) and in Section 5.6.6 Policy Objective T20: Park and Ride (page 110).</p> <p>The NTA Strategy for the GDA and the RSES identifies the need for Park &amp; Ride facilities in the vicinity of Woodbrook. The location of the permanent Woodbrook Park and Ride has not yet been determined and hence the exact location is not specified in the Draft Plan. It should also be noted that as set out in the submission of the NTA in 2020 a new Park and Ride Development Office was established in the NTA and a Park and Ride strategy is being prepared for the GDA. In the interest of clarity, it is considered appropriate to add some further explanatory text to Section 5.6.6.</p> <p>See also Section 2.3 above in terms of the submission from the NTA regarding the new the Park and Ride Office and recommendation made by the Executive in relation to Policy Objective T20 to liaising with same.</p> <p><b>Recommendation</b>  Insert the following text to Section 5.6.6 (page 110) after the first paragraph following the Policy Objective T20:</p> <p><i><u>The RSES and the existing NTA Strategy for the GDA identifies the need for Park and Ride facilities in the vicinity of Woodbrook-Shanganagh. It is anticipated that permanent Park and Ride facilities may be provided at a location proximate to the south-eastern commuter line to serve the broader Bray, Woodbrook-Shanganagh and Fassaroe area. The provision of a Strategic Park and Ride should not however undermine the capacity of existing or planned infrastructure to provide for the development of the immediate area.</u></i></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<b>3.5.2: Promoting Modal Change</b>			
<b>3.5.2.1: Policy Objective T3: Development of Sustainable Travel and Transport</b>			
<p>i) Submission from the Department of Transport highlights the fact that <i>Smarter Travel</i>, will be replaced with the new national sustainable mobility Policy; objectives 5.4.1. and 5.4.2 objectives should be updated.</p> <p>Submission queries whether Smarter Travel: A Sustainable Transport Future 2009-2020’ - has been revised and updated?</p>	<p><b>B0016</b> <b>B0406</b></p>		<p>The content of the submission is noted and welcomed.</p> <p>It is considered appropriate to add in the updated references to the new national sustainable mobility policy which will replace Smarter Travel to Policy Objectives T3 5.4.1. and T4 5.4.2.</p> <p><b>Recommendation</b> Amend Sections 5.4.1 Policy Objective T3 (p 103) as follows: From: <i>“It is a Policy Objective to promote, facilitate and cooperate with other transport agencies in securing the implementation of the transport strategy for the County and the wider Metropolitan Area as set out in Department of Transport’s ‘Smarter Travel, A Sustainable Transport Future 2009 –2020’ including the modal share targets and the NTA’s ‘Greater Dublin Area Transport Strategy 2016-2035’, the RSES and the MASP”</i> To: <i>“It is a Policy Objective to promote, facilitate and cooperate with other transport agencies in securing the implementation of the transport strategy for the County and the wider Metropolitan Area as set out in Department of Transport’s ‘Smarter Travel A Sustainable Transport Future 2009 –2020’ including the modal share targets, <u>and subsequent updates and the NTA’s ‘Transport Strategy for the Greater Dublin Area <del>Transport Strategy</del> 2016-2035’ and subsequent updates, the RSES and the MASP.”</u></i></p> <p>Amend Section 5.4.2 Policy Objective T4 as follows From: <i>“It is a Policy Objective to expand attractive public transport alternatives to car transport as set out in ‘Smarter Travel, A Sustainable Transport Future 2009-2020’, the NTA’s ‘<del>Greater Dublin Area</del> Transport Strategy for the Greater Dublin Area 2016-2035’ and the NTAs ‘Integrated Implementation Plan 2019-2024’ <u>and subsequent updates</u> by optimising existing or proposed transport corridors and interchanges and by developing new park and rides and taxi ranks and cycling network facilities at appropriate locations.”</i> To:</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p><i>"It is a Policy Objective to expand attractive public transport alternatives to car transport as set out in 'Smarter Travel, A Sustainable Transport Future' and subsequent updates; the NTA's 'Greater Dublin Area Transport Strategy for the Greater Dublin Area 2016-2035' and the NTAs 'Integrated Implementation Plan 2019-2024' and subsequent updates ; by optimising existing or proposed transport corridors, <del>and</del> interchanges, <del>and</del> by developing new park and rides, <del>and</del> taxi ranks and cycling network facilities at appropriate locations."</i></p>
<p>ii) Sustainable Travel and Transport is fully supported; however, it should also take into consideration the requirement for residents especially families to travel longer distances in a car.</p> <p>Car travel will remain a significant percentage of total personal transport going forward with the growth of zero emission vehicles.</p>	<p><b>B1063</b> <b>B1125</b></p>		<p>The Executive notes the issue raised and welcomes the support of sustainable travel and transport.</p> <p>This issue is addressed in sections: 5.1: Introduction and 5.4.1. Policy Objective T3: Development of Sustainable Travel and Transport</p> <p>The transport strategy for the County does not preclude the use of the private car. The emphasis is on avoiding or reducing the need to travel, shifting to more sustainable modes and improving the energy efficiency of motorised transport modes. In increasing the mode share of active modes and public transport for suitable trips more road space should be available for people who need to use motorised transport.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.5.2.2: Policy Objective T4: Public Transport Improvements</b>			
<p>i) Submission from Iarnród Éireann / Irish Rail requests that the Plan supports the:</p> <ul style="list-style-type: none"> <li>• Implementation of the DART+ Programme</li> <li>• Removal of Merrion Gates (although not in DLR) level crossing and the alternative road infrastructure solution identified.</li> <li>• Further expansion of Irish Rail's Accessibility Programme.</li> <li>• Development of Customer Information Services (CIS)</li> </ul>	<p><b>B0989</b></p>		<p>The Executive notes the issue raised.</p> <p>The Draft Plan includes supports sustainable modes including rail based transport in a number of Policy Objectives which addresses aspects of the issues raised as follows:</p> <ul style="list-style-type: none"> <li>• 5.4.2 Policy Objective T4: Public Transport Improvements</li> <li>• 5.4.4 Policy Objective T6: Public transport Interchanges</li> <li>• 5.4.7 Policy Objective T9: Rail Stations/Luas Stops</li> <li>• 5.6.6 Policy Objective T20: Park and Ride</li> </ul>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> <li>• Implementation of the Sustainable Interchange Programme.</li> <li>• Implementation of the Park and Ride Strategy which is being developed in conjunction with the NTA, Iarnród Éireann's and Councils.</li> <li>• Electrification of Intercity routes.</li> <li>• A revised rail freight strategic plan (when available)</li> </ul>			<p>While Section. 5.4.2 Policy Objective T4: Public Transport Improvements refers to “The delivery of priority elements of the DART Expansion Programme; it is considered appropriate to refer to the DART+ Programme as requested.</p> <p>With regard to the recommendation that the plan support the removal of Merrion Gates, these are located outside of the functional area of the Planning Authority and hence this would not be appropriate.</p> <p>It is considered appropriate to refer to the Accessibility Programme, which includes the upgrade of stations in terms of accessibility; which is essential for the inclusivity and mobility of persons with reduced mobility within the transport networks in Section 5.4.7 Policy Objective T9: Rail Stations/Luas Stops.</p> <p>It is noted that S. 5.6.6 Policy Objective T20: Park and Ride has been amended on foot of the submission of the NTA and now refers to the Park and Ride Strategy.</p> <p>In formulating this response, the Executive have in accordance with section 12 (8) (b) (iii) of the Planning and Development Act, 2000, (as amended) taken account of the strategic direction received from the members at pre-draft stage “<i>That the Chief Executive ensures that inclusivity as a theme permeates through relevant policies of the Draft Plan</i>”.</p> <p><b>Recommendation</b> Add the following paragraph following the bullet points on page 103:</p> <p><i><u>It is a Policy Objective to support the DART+ Programme which will provide a higher frequency, integrated rail connection into the city with enhanced interchange with other modes.</u></i></p> <p>Add the following paragraph to 5.4.7 Policy Objective T9: Rail Stations/Luas Stops page 105 following “Access routes to and through all rail station stops.”:</p> <p><i><u>The Accessibility Programme of Iarnród Éireann, which provides for the upgrade of rail stations in terms of accessibility is anticipated to deliver improvements for persons with reduced mobility in the rail network.</u></i></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>ii) Issues raised with regards to overall transport provision including</p> <ul style="list-style-type: none"> <li>• Public transport being at capacity.</li> <li>• Requirement for a review of transport provision, including roads and public transport relative to the quanta of development proposed.</li> <li>• Concern with the Luas Green line and bus capacity particularly in the vicinity of the Glencairn Luas Stop seeking increased public transport services in terms of routes and frequency.</li> <li>• Considers that there is a need for a clear and ambitious commitment given to improving public transport provision.</li> <li>• Concerned with the lack of investment in public transport and making it accessible.</li> </ul>	<p><b>B0720</b> <b>B1047</b> <b>B1063</b> <b>B1075</b> <b>B1079</b></p>	<p><b>6</b></p>	<p>The Executive notes the issues raised.</p> <p>The following Policy Objectives are relevant to the issues raised in terms of Transport Strategy and Public Transport policy:</p> <ul style="list-style-type: none"> <li>• Policy Objective T3: Development of Sustainable Travel and Transport</li> <li>• Policy Objective T4: Public Transport Improvements</li> <li>• Policy Objective T5: Quality Bus Networks/Bus Connects</li> <li>• Policy Objective T6: Public Transport Interchanges</li> <li>• Policy Objective T7: Green Line Capacity Enhancement</li> <li>• Policy Objective T8: Luas Extension and Metrolink</li> <li>• Policy Objective T9: Rail Stations and Luas Stops</li> </ul> <p>The Council is a facilitator of public transport services rather than a provider. The NTA Strategy for the Greater Dublin Area considers the overall provision of transport, including public transport, to facilitate the proposed quanta of development in the Dublin Region. This strategy is currently being reviewed and the Council is liaising with the NTA on the review. The frequency and operating capacity of the Luas is a matter for the TII and NTA. It is noted that this capacity is being enhanced under the Green Line Capacity Enhancement Programme. It should also be noted that the licencing and operation of bus services is a matter for the NTA. The Council is working closely with the NTA in terms of the Bus Connects project which will increase the capacity of the bus service in the County and improve the network.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) The Plan needs to consider appropriate intercity, commuter and local transport solutions, such as</p> <ul style="list-style-type: none"> <li>• LUAS extension.</li> <li>• Length of the core Bus Corridor.</li> <li>• Number of traffic lights on the N11 route.</li> <li>• Lack of a direct regular public transport link from Shankill to adjoining employment zones, and</li> </ul>	<p><b>B1155</b></p>		<p>The Executive notes the issues raised.</p> <p>The following Policy Objectives are relevant to the issues raised in terms of Transport Strategy and Public Transport policy:</p> <ul style="list-style-type: none"> <li>• Policy Objective T3: Development of Sustainable Travel and Transport</li> <li>• Policy Objective T4: Public Transport Improvements</li> <li>• Policy Objective T5: Quality Bus Networks/Bus Connects</li> </ul>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> <li>Need for a local bus service within Shankill linking it with local transport hubs.</li> </ul>			<ul style="list-style-type: none"> <li>Policy Objective T6: Public Transport Interchanges</li> <li>Policy Objective T7: Green Line Capacity Enhancement</li> <li>Policy Objective T8: Luas Extension and Metrolink</li> <li>Policy Objective T9: Rail Stations and Luas Stops</li> </ul> <p>The Council is a facilitator of public transport services rather than a provider. The NTA Strategy for the Greater Dublin Area considers the overall provision of transport, including public transport, to facilitate the proposed quanta of development in the Dublin Region. This strategy is currently being reviewed and the Council is liaising with the NTA on the review of strategy.</p> <p>It should also be noted that the licencing and operation of bus services is a matter for the NTA. BusConnects is the National Transport Authority's (NTA) programme to greatly improve bus services in Irish cities. It is a key part of the Government's policy to improve public transport and address climate change in Dublin and other cities across Ireland. BusConnects Dublin includes two main projects:</p> <ul style="list-style-type: none"> <li>The Dublin Area Bus Services Network Redesign and</li> <li>The Dublin Area Core Bus Corridors Infrastructure Works</li> </ul> <p>The BusConnects Project is being delivered as a separate process to the County Development Plan, and it has been subject to extensive engagement with stakeholders by the NTA. While the Network Redesign aspect was concluded in September 2020; it is noted that further public input will be possible regarding the Core Bus Corridors when they are submitted to an Bord Pleanála (it is anticipated that this phase of the project will begin later in 2021). The Council has engaged closely with the NTA in terms of the Bus Connects project to improve the bus service in the County.</p> <p>The construction of the new DART station at Woodbrook will improve the access to commuter and intercity rail services. This station will be combined with provision of a public transport interchange with bus will improve the connectivity of this area to public transport services.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<b>3.5.2.3: Policy Objective T5 Quality Bus Network/Bus Connects</b>			
<p>iv) A number of submissions refer to bus services and Bus Connects raising issues including:</p> <ul style="list-style-type: none"> <li>Local buses should be smaller to navigate certain routes.</li> <li>Existing service needs to be improved to move people away from cars not only in relation to facilitating transport to the city centre but also east – west.</li> <li>Broadly welcome the Bus Connects proposals to deliver three orbital core bus corridors.</li> <li>Considers that there are very few bus routes.</li> <li>Concerns in relation to Bus connects in Shankill including impact on pedestrian and cyclist facilities. Alternative suggestions including termination of Core Bus Corridor 13 at Loughlinstown Roundabout thus providing an opportunity to provide segregated cycle routes through Shankill.</li> </ul>	<p><b><u>B0121</u></b>  <b><u>B0314</u></b>  <b><u>B0542</u></b>  <b><u>B0773</u></b>  <b><u>B0942</u></b>  <b><u>B1003</u></b>  <b><u>B1072</u></b>  <b><u>B1079</u></b>  <b><u>B1155</u></b></p>		<p>The Executive notes the issues raised.</p> <p>The following Policy Objectives are relevant to the issues raised in terms of Transport Strategy and Public Transport policy:</p> <ul style="list-style-type: none"> <li>Policy Objective T3: Development of Sustainable Travel and Transport</li> <li>Policy Objective T4: Public Transport Improvements</li> <li>Policy Objective T5: Quality Bus Networks/Bus Connects</li> <li>Policy Objective T6: Public Transport Interchanges</li> </ul> <p>The Council is a facilitator of public transport services rather than a provider. It should also be noted that the licensing and operation of bus services is a matter for the NTA</p> <p>The NTA strategy for the GDA considers the overall provision of transport, including public transport, to facilitate the proposed quanta of development in the Dublin Region. This strategy is currently being reviewed and the Council is liaising with the NTA on the review of strategy.</p> <p>BusConnects is the National Transport Authority’s (NTA) programme to greatly improve bus services in Irish cities. It is a key part of the Government’s policy to improve public transport and address climate change in Dublin and other cities across Ireland. BusConnects Dublin includes two main projects:</p> <ul style="list-style-type: none"> <li>The Dublin Area Bus Services Network Redesign and</li> <li>The Dublin Area Core Bus Corridors Infrastructure Works</li> </ul> <p>The BusConnects Project is being delivered as a separate process to the County Development Plan, and it has been subject to extensive engagement with stakeholders by the NTA. While the Network Redesign aspect was concluded in September 2020; it is noted that further public input will be possible regarding the Core Bus Corridors when they are submitted to an Bord Pleanála (it is anticipated that this phase of the project will begin later in 2021).</p> <p>The Council has engaged closely with the NTA in terms of the Bus Connects project to improve the bus service in the County along with pedestrian and cycle facilities and the public</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>realm. The submissions made by the Council to the Bus Connects project can be seen on the Council Website. As the Bus Connects project has further evolved since preparation of the Draft Plan it is recommended that section 5.4.3 be updated.</p> <p><b>Recommendation</b>  Replace the left Column text on page 104 after the first paragraph in section 5.4.3 as follows:</p> <p><u><i>“BusConnects Dublin is a programme of integrated projects being progressed by the National Transport Authority, which seeks to overhaul the current bus system in the Dublin area. It comprises several parallel strands of activity, including:</i></u></p> <ul style="list-style-type: none"> <li><u><i>• Core Bus Corridors (CBCs) Infrastructure Works, including new segregated cycling facilities. (Planning permission is to be sought in 2021 from An Bord Pleanála ).</i></u></li> <li><u><i>• Bus Services Network Redesign. (Finalised plans published by the NTA in September 2020).</i></u></li> </ul> <p><u><i>Other elements of BusConnects include a new ticketing and cashless payment system, new bus stops and shelters and new bus livery with Low Emissions Vehicle technology.</i></u></p> <p><u><i>The Core Bus Corridors Infrastructure Works as proposed will include the following radial routes to and from the city centre:</i></u></p> <ul style="list-style-type: none"> <li><u><i>• The Bray to City Centre Core Bus Corridor which will run through Shankill and along the N11</i></u></li> <li><u><i>• The Blackrock to Merrion Core Bus Corridor which will run along Temple Hill, Frascati Road and Rock Road</i></u></li> <li><u><i>• The UCD to Ballsbridge Core Bus Corridor which will run along the N11 and Nutley Lane</i></u></li> </ul> <p><u><i>The BusConnects Network Redesign will see an increase in services, both spine routes (through the city centre) and orbital routes (not through the city centre) as well as improved frequencies to provide a greater number of services and connections to more places across the city. To facilitate these service enhancements, improvements to bus interchange facilities are proposed at Dundrum, UCD and Dún Laoighaire.</i></u></p> <p><u><i>It is noted that the NTA have to seek approval from An Bord Pleanála for each of the Core Bus Corridors. The main bus routes serving the County under the BusConnects Network Redesign will include:</i></u></p> <p><u><i>Spine Routes (high frequency routes through the city centre);</i></u></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><u><i>A2 – Dundrum – Ballinteer – Grange Road – City Centre – Dublin Airport</i></u>  <u><i>A4 – Dundrum – Barton Road – Nutgrove – City Centre – Swords Manor</i></u>  <u><i>B3 – Dún Laoghaire – Monkstown Road – Rock Road – City Centre – Hollywoodrath</i></u>  <u><i>B4 – Killiney Shopping Centre – Rochestown Avenue – Abbey Road – Rock Road – City Centre – Blanchardstown Shopping Centre</i></u>  <u><i>E1 – Ballywaltrim – Bray – Shankill – N11 – City Centre – Northwood</i></u>  <u><i>E2 – Dún Laoghaire – Kill Lane – N11 – City Centre – Charlestown Shopping Centre</i></u></p> <p><u><i>Orbital Routes (high frequency routes not through the city centre);</i></u></p> <p><u><i>S8 – Dún Laoghaire – Monkstown Road – Newtownpark Avenue – Leopardstown Road – Sandyford – Grange Road – City West</i></u>  <u><i>S6 – Blackrock – Mount Merrion Avenue – UCD – Mount Anville Road – Dundrum – Nutgrove – Tallaght</i></u>  <u><i>S4 – UCD – Bird Avenue – Rathgar – Terenure – Liffey Valley</i></u></p> <p><u><i>The BusConnects Network Redesign also includes a significant number of other city bound routes, peak hour routes and local routes. One of the most significant local routes includes the L25, which will connect the two Major Town Centres within the County as follows:</i></u>  <u><i>L25 – Dún Laoghaire – Monkstown Avenue – Stillorgan Park – Stillorgan – Kilmacud Road Upper – Dundrum.”</i></u></p>
<p>v) Request removal of priority bus route from Roebuck Road (insufficient width and cycle lane has been installed and bus connects plan shows that new route no 86 will be only once every 30/60 mins).</p>	<p><b>B0529</b></p>	<p><b>1</b></p>	<p>The Executive agrees with the contents of this submission. The Traffic Section have re-evaluated the proposed bus priority routes following the Bus Connects Services Network Redesign and consider that bus priority routes should be omitted and instead replaced with an objective to assess the potential for bus priority measures at appropriate locations.</p> <p><b>Recommendation</b>  Insert the following text on page 104 as the last paragraph to Section 5.4.3</p> <p><i>“It is an objective of the Council to assess the potential for bus priority measures at appropriate locations and to seek to implement such measures in order to support the provision of bus services planned under the BusConnects Network Redesign.”</i></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><u>Add the following text after the bullet point on page 80 4.3.1.1 PHP18: Residential Density and on page 104 Appendix 5: Building Height Strategy after Policy objective BHs1</u></p> <p><u>“It should be noted that there are a number of existing bus lanes in the County which afford some localised bus priority, however following the adoption of the Bus Connects Network Redesign they are no longer part of an overall bus priority network. In this regard higher densities can be justified along the proposed Core Bus Corridor routes (existing QBCs on N11 and Rock Road) and the Kill Lane/Avenue Mounttown route (Bus Priority Route), which is a strategic bus link between Dún Laochaire and the N11 and along which, sections of bus lanes are already in place.”</u></p> <p><u>Mapping</u>  <u>Delete all proposed bus priority routes from development plan maps 1,2,3, 4, 5, 6, 7, 9, 10 and 14.</u>  <u>Omit Supplementary Map T1 Bus Priority Network.</u></p> <p><u>Change mapping note 4 from:</u>  <u>The Core Bus Corridors may be subject to change. Proposed Bus Priority Routes may be stood down following the roll out of the Bus Connects Redesign Project.</u></p> <p><u>To</u>  <u>The Core Bus Corridors may be subject to change. It should be noted that the core bus corridors incorporate the existing quality bus corridors on the N11 and Rock Road.</u></p>
vi) Request bus route to Dublin Mountains for recreational access.	<b>B0122</b>		<p>The Executive notes the issue raised. <b>This is not a Development Plan issue.</b></p> <p>The delivery of bus services is within the remit of the NTA. The Traffic Section of DLR have liaised with the Dublin Mountain Partnership on the large volume of visitors to the Dublin Mountains, particularly at the weekends and have raised the issue of a need for a weekend bus service to the Dublin mountains with the NTA.</p> <p><b>Recommendation</b>          No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<b>3.5.2.4: Policy Objective T7: Green Line Capacity Enhancement (GLCE) Project</b>			
<p>i) Green Line Capacity Enhancement (GLCE) Project: Objective should be prioritised asap.</p> <p>Plan should be updated with current status of the Green Line Capacity Enhancement Programme.</p>	<p><b>B0942</b> <b>B1125</b></p>		<p>The Executive notes the issues raised and agrees that the text should be updated with the current status of the Green Line Capacity Enhancement Project</p> <p>The Council is a facilitator of public transport services rather than a provider. The NTA Strategy for the Greater Dublin Area considers the overall provision of transport, including public transport, to facilitate the proposed quanta of development in the Dublin Region. This strategy is currently being reviewed and the Council is liaising with the NTA on the review of strategy.</p> <p>The frequency and operating capacity of the Luas is a matter for the TII and NTA. It is noted that this capacity is being enhanced under the Green Line Capacity Enhancement Programme. The Council supports the Capacity Enhancement Project, but the delivery is beyond the remit of the Council as set out in Policy Objective T7: Green Line Capacity Enhancement (GLCE) Project.</p> <p><b>Recommendation</b> Replace the second and third paragraphs of Policy Objective T7: Green Line Capacity Enhancement From (GLCE) Project (p 104):</p> <p><i>“Phase 1, expected to be completed by Q2 2021, involves extending the existing twenty six 43-metre long trams to 55 metres in length and the delivery of an additional eight 55 metre trams to the fleet. Extending the trams will increase passenger capacity by c. 30%.</i></p> <p><i>Phase 2 involves increasing frequency by operating thirty 55m trams per hour (in each direction) – one every two minutes.”</i></p> <p>with the following text:</p> <p><u><i>“Phase 1 which provides for the following improvements to the Luas Green Line has been completed:</i></u></p> <ul style="list-style-type: none"> <li>• <u><i>40% overall increase in service capacity</i></u></li> <li>• <u><i>Increase of 3,000 passengers per direction per hour (pdph)</i></u></li> <li>• <u><i>Future proof line capacity into 2030's</i></u></li> </ul>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<ul style="list-style-type: none"> <li>• <a href="#"><u>Purchase of 8 new trams</u></a></li> <li>• <a href="#"><u>Increase length of the existing fleet (26 trams) to 55m long</u></a></li> <li>• <a href="#"><u>Increased tram capacity</u></a></li> <li>• <a href="#"><u>Increased service frequency</u></a></li> </ul> <p><a href="#"><u>Phase 2 which involves increasing frequency of service by operating thirty 55m trams per hour (in each direction) – one every two minutes, is at the project planning and design stage. This upgrade of the Luas Green Line to increase capacity in the peak hour would require both infrastructural improvements and acquisition of additional trams. The time line and budget for this phase has not yet been announced by the TII/NTA".</u></a></p>
<b>3.5.2.5: Policy Objective T8: Luas Extension and Metrolink</b>			
<p>i) Various submission relate to Luas, Luas Extension and Metrolink as follows:</p> <ul style="list-style-type: none"> <li>• Need to focus on the provision of existing and interim services.</li> <li>• Propose new Luas from Dundrum down to 46A and/or the DART at Booterstown via bus route/light.</li> <li>• Propose new Luas line from Rathfarnham to Booterstown.</li> <li>• Support for the Council’s inclusion of the Luas Extension to Bray.</li> <li>• Support the delivery of the metro extension to Bray.</li> </ul>	<p><b><u>B0355</u></b>  <b><u>B0586</u></b>  <b><u>B0587</u></b>  <b><u>B0694</u></b>  <b><u>B1125</u></b></p>		<p>The Executive notes the issues raised.</p> <p>The Council is a facilitator of public transport services rather than a provider and the Plan must be consistent with the NTA’s Transport Strategy for the GDA. This strategy considers the overall provision of transport, including public transport, to facilitate the proposed quantum of development in the Dublin Region. This strategy is currently being reviewed and the Council is liaising with the NTA on the review of strategy.</p> <p>In terms of Bus Connects network redesign it is noted that there are three orbital bus routes (<i>high frequency routes not through the city centre</i>) along with one local route which will improve the East-West connections across the County.:</p> <p>The extension of the Luas to Bray is an integral requirement of the Bray and Environs Transport Study (the local expression of the NTA’s strategy) as reflected in Policy Objective T2: Delivery of Enabling Transport Infrastructure for the Bray-Fassaroe-Old Connaught area.</p> <p>The EMRA RSES reflects the NTA’s Strategy. The NTA has noted that while the alignment of the Luas Extension to Bray has not been finalised, the indicative alignment contained in the Transport Strategy is reflected in the Draft on Map 14. On the other hand, the inclusion on Map 14 of a Luas spur that branches at Old Connaught to serve Fassaroe, is not included in the Strategy for the GDA nor currently proposed by the NTA. The NTA have recommended that the proposed Luas spur to Fassaroe should be removed from the final Plan or, if retained, should be accompanied by an explanatory note outlining the status of the proposal and</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>committing to further consideration informed by, and in the context of, the next GDA Transport Strategy.</p> <p>The Executive have proposed on foot of the submission by EMRA and the NTA to remove the proposed Luas spur to Fassaroe.</p> <p><b>Recommendation</b> See response and recommendation above under S.2.2 and 2.3.</p>
<b>3.5.3: Promoting Active Travel Cycling and Walking</b>			
<b>3.5.3.1: Policy Objective T10: Walking and Cycling</b>			
<p>i) Numerous submissions raised issue relating to active travel as follows:</p> <ul style="list-style-type: none"> <li>• Welcome need to reduce travel by private car</li> <li>• Plan needs to acknowledge need to reduce car ownership, car dependency and road space and instead move towards more cycling and walking infrastructure.</li> <li>• Cars are the priority and walking is not properly considered.</li> <li>• Speed limits must be reduced, with priority at junctions and traffic lights to pedestrians and cyclists.</li> <li>• Introduce a 30 km speed limit</li> <li>• Recommends a new approach such as the removal of traffic lanes for pedestrians and cyclists and speeding up the upgrade of the Luas.</li> <li>• Shift to active travel can address Climate emergency, traffic congestion, air pollution and improve health.</li> <li>• Business Districts need to be linked by segregated, connected cycle and walk ways with sufficient covered bike parking at each</li> </ul>	<p><u><b>B0030</b></u> <u><b>B0180</b></u> <u><b>B0283</b></u> <u><b>B0319</b></u> <u><b>B0406</b></u> <u><b>B0435</b></u> <u><b>B0512</b></u> <u><b>B0586</b></u> <u><b>B0652</b></u> <u><b>B0682</b></u> <u><b>B0720</b></u> <u><b>B0723</b></u> <u><b>B0749</b></u> <u><b>B0752</b></u> <u><b>B0765</b></u> <u><b>B0767</b></u> <u><b>B0768</b></u> <u><b>B0794</b></u> <u><b>B0885</b></u> <u><b>B0942</b></u> <u><b>B1024</b></u> <u><b>B1047</b></u> <u><b>B1063</b></u></p>		<p>The Executive notes the issues raised and welcomes the support given to the Council’s approach to improving active travel in the County.</p> <p>The Draft Plan contains a suite of Policy Objectives aimed at achieving the Strategy County Outcomes (SCO’s) listed in Chapter 1. Compact growth is promoted in Policy Objective CS11: Compact Growth where 100 % of new homes will be delivered within or contiguous to Dublin city and suburbs. The 10-minute neighbourhood concept promoted in Policy Objective PHP4: Villages and Neighbourhoods is important in creating sustainable neighbourhoods where residents are able to walk or cycle to facilities that serve their daily needs and/or be within a short walk of high quality public transport providing good access to a range of facilities and employment that may not be available locally.</p> <p>Chapter 5 also supports the Strategic County Outcomes listed in Chapter 1 through a holistic approach to transport with the aim to “<i>reduce the dependency on the private car in favour of walking cycling and public transport</i>” with an overall policy approach which includes avoid-shift-improve.</p> <p>There is a suite of policies which support active travel (walking and cycling) in the Draft Plan as set out in the following Policy Objectives:</p> <ul style="list-style-type: none"> <li>• Policy Objective T10: Walking and Cycling</li> <li>• Policy Objective T11: Footways and Pedestrian Routes</li> <li>• Policy Objective T12: County Cycle Network</li> </ul>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>work hub. Showers, dry rooms should be supplied by employers.</p> <ul style="list-style-type: none"> <li>• Smart Dublin needs a smart, people-centred, climate conscious active travel plan.</li> <li>• Reducing speed limits and creating more cycle-only streets to cater for all ages and abilities, including cargo bikes, disabled cyclists, and children. People living in apartments and terraced houses need secure cycle parking.</li> <li>• Plan discriminates against older people who cannot cycle and need to use car for mobility reasons.</li> <li>• A network of connected segregated cycle routes is essential to make cycling safe for all regardless of ability or age</li> <li>• roads around Dún Laoghaire town are too car dominated – safe wide paths and bike lanes are needed.</li> <li>• Appropriate cycle and running facilities through estates and in public footpaths are needed.</li> <li>• Request more segregated cycle facilities that can be used by young and old similar to the Dutch and more pedestrianised streets</li> <li>• More greenways are needed with good connections to public transport</li> <li>• Children are growing up without independence due to car dominance.</li> <li>• Requests an increase in joined up safe cycling infrastructure.</li> <li>• Cycle routes should be off road as when on road they lead to congestion and this is increasing our carbon footprint. The cycle network should be elevated above footpaths –</li> </ul>	<p><b>B1075</b>  <b>B1085</b>  <b>B1100</b>  <b>B1120</b>  <b>B1145</b>  <b>B1164</b>  <b>B1195</b>  <b>B1205</b></p>		<ul style="list-style-type: none"> <li>• Policy Objective T13: Coastal Cycling Infrastructure</li> <li>• Policy Objective T14: Bike Rental Schemes</li> </ul> <p>These policies are complemented by policy in Chapter 12 Development Management in particular sections 12.4.1 Traffic Management and Road Safety, 12.4.3 Travel Plans and 12.4.6 Cycle Parking.</p> <p>The promotion of active modes is an important part of the ongoing operations of the Council. Dún Laoghaire-Rathdown County Council have received an NTA Sustainable Transport Measures Grant funding allocation of €34,145,000 related to 43 walking and cycling related projects across the County. This consists of a mix of older, continuing and new projects and all of these projects are being 100% funded by the NTA grant.</p> <p>The roll out of the County cycle network and the NTAs GDA Cycle Network is continuing and some elements are being fast-tracked on foot of Covid-19 pandemic. Upgrading routes through our public parks and open spaces greenways is an important aspect of the walking and cycling infrastructure which the Council is upgrading. Accessibility to parks is being progressively improved, giving access to the full range of bicycles including mobility bicycles and cargo bikes.</p> <p>Innovative responses and pilot schemes are being actively trialled by the Council which bring about improvements to the public realm, cycle, walking infrastructure and also supporting business. Increases in cycle parking at key destinations is also ongoing and the provision of alternative bike storage is being investigated.</p> <p>New signage on cycle routes will be trialled as part of the three proposed new Safe Walking &amp; Cycling Routes titled Sea to Mountains, Mountains to Metals and Park to Park.</p> <p><b>The setting of speed limits is through Bye laws and is a reserved function. In this regard there is an ongoing review of speed limits. This is not a County Development Plan issue.</b></p> <p>The Active School Travel initiative of the Council which began in 2019 is aimed at supporting and promoting alternative means for children to get to school in a safe and active way, in particular, walking and cycling. This initiative is being carried out in partnership with other stakeholders, including the Department of Transport, Tourism and Sport, The National</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>this should be trialled somewhere in the country.</p> <ul style="list-style-type: none"> <li>• Welcome for recent improvements to public transport and active modes. Concern with predominance of car traffic which has a negative impact on air quality and health</li> <li>• Further villages and towns could be pedestrianised further while allowing cycle and disability access.</li> <li>• signage on cycle routes should be improved.</li> <li>• Provide high quality, segregated cycling infrastructure.</li> <li>• Requests more curb-segregated bike lanes County-wide.</li> <li>• Run a pilot scheme similar to DCC to allow community use bike storage bunkers in on street locations</li> <li>• Provide low traffic routes and well designed junctions and high quality, secure and convenient public cycle parking to encourage more people to cycle. Include cargo bike/disability bike spaces.</li> <li>• Safe to Schools Programme should feature in this Policy Objective.</li> </ul>			<p>Transport Authority (NTA) and the An Taisce – Green Schools Travel programme. The Green-Schools Travel Programme have developed 'Safe to School – An Ideas Document for Safe Access to Schools' for schools to consider implementing in order to allow for recommended physical distancing on arrival to school and to address front of school vehicle congestion. A pilot programme of school zones funded by the NTA is being tested in the County in 2021.</p> <p><b>Recommendation</b>  Include the following text at the end of the first paragraph on the right-hand column on page 106:</p> <p><i><u>"The Active School Travel initiative of the Council which began in 2019 is aimed at supporting and promoting alternative means for children to get to school in a safe and active way, in particular, walking and cycling. This initiative is being carried out in partnership with other stakeholders, including the Department of Transport, Tourism and Sport, The National Transport Authority (NTA) and the An Taisce – Green Schools Travel programme. The Green-Schools Travel Programme have developed 'Safe to School – An Ideas Document for Safe Access to Schools' for schools to consider implementing in order to allow for recommended physical distancing on arrival to school and to address front of school vehicle congestion."</u></i></p>
<p>ii) Submission suggests alternative wording for Policy Objective T10: Walking and Cycling based on various County Development Plans within the Country and extensive additional Policy Objectives which relate to walking, cycling and walking and cycling which are also based on various County Development Plans within the Country</p>	<b>B0594</b>		<p>The Executive notes the issues raised in this comprehensive submission.</p> <p>The Draft Plan contains a suite of Policy Objectives aimed at achieving the Strategy County Outcomes (SCO's) listed in Chapter 1. The overarching policy approach of the Draft Plan is centered on promoting the 10-minute neighborhood and compact climate resilient communities where people have the options to use public transport and the softer modes (active travel) for everyday trips.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>Chapter 5 (Section 5.1) sets out a holistic approach to transport with the aim to “<i>reduce the dependency on the private car in favour of walking cycling and public transport</i>” with an overall policy approach which includes avoid-shift- improve.</p> <p>There is a suite of policies which support active travel (walking and cycling) in the Draft Plan as set out in the following Policy Objectives:</p> <p>Policy Objective T10: Walking and Cycling                      Policy Objective T11: Footways and Pedestrian Routes                      Policy Objective T12: County Cycle Network                      Policy Objective T13: Coastal Cycling Infrastructure                      Policy Objective T14: Bike Rental Schemes</p> <p>These policies are complemented by policy in Chapter 12 Development Management in particular sections 12.4.1 Traffic Management and Road Safety, 12.4.3 Travel Plans and 12.4.6 Cycle Parking.</p> <p>It is considered that existing Policy objective T10: Walking and Cycling and the other Policy Objectives are sufficiently robust and deliberately worded to achieve the aims of the Council with regard to walking and cycling and that additional policies in this regard are neither required nor necessary.</p> <p><b>Recommendation</b>                      No change to Draft Plan.</p>
<p>iii) Submissions raise the following issues with regard to permeability:</p> <ul style="list-style-type: none"> <li>Plan should clarify that permeability objectives refers to sustainable transport means and not private cars.</li> <li>Welcomes the 15-minute city model, mixed use development near local services, high density development and services within 15 mins of every home.</li> </ul>	<p><b><u>B1205</u></b> <b><u>B0319</u></b></p>		<p>The Executive agrees with the issues raised.</p> <p>Policy Objective T10: ‘Walking and Cycling’ seeks to develop a “<i>high quality, fully connected and inclusive walking and cycling network across the County and the integration of walking, cycling and physical activity with placemaking including public realm improvements</i>”.</p> <p>Policy objective T11: ‘Footways and Pedestrian Routes’ seeks to maintain and expand the footway and pedestrian route network in the County through the development management process with improved pedestrian links.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<ul style="list-style-type: none"> <li>• Welcomes the 10-minute neighbourhood and suggests that permeability is improved to encourage this.</li> </ul>			<p>There is reference to improved permeability in Chapter 12 ‘Development Management’ including Sections:</p> <ul style="list-style-type: none"> <li>• 12.3.1.1 ‘Design Criteria’</li> <li>• 12.4.1 ‘Traffic Management and Road Safety’</li> <li>• 12. 8. 5. 2 ‘Accessibility, Permeability, Security and Privacy’</li> </ul> <p>Whilst Policy Objectivities T10 and T11 would improve permeability and aid in the evolution of the 10-minute neighbourhood concept, this is not explicitly referenced in either Policy Objective. As has been previously set out in Section 3.4 above it is recommended that Policy Objective T10 is amended to include reference to both permeability and the 10-minute neighbourhood concept.</p> <p><b>Recommendation</b></p> <p>As previously set out in Section 3.4 the following changes are proposed:</p> <p>Amend Policy Objective T10 ‘Walking and Cycling’ (p.106) from:</p> <p><i>“It is a Policy Objective to secure the development of a high quality, fully connected and inclusive walking and cycling network across the County and the integration of walking, cycling and physical activity with placemaking including public realm improvements. (Consistent with NPO 27 and 64 of the NPF and RPO 5.2 of the RSES)”</i></p> <p>To:</p> <p><i>“It is a Policy Objective to secure the development of a high quality, fully connected and inclusive walking and cycling network across the County and the integration of walking, cycling and physical activity with placemaking including public realm and <u>permeability</u> improvements. (Consistent with NPO 27 and 64 of the NPF and RPO 5.2 of the RSES).”</i></p> <p>Amend paragraph 1 and 2 under Policy Objective T10 ‘Walking and Cycling’ (p.106) from:</p> <p><i>“A key aim of Smarter Travel is to ensure that walking and cycling become the mode of choice for local trips. The encouragement of walking and cycling (active mobility) is a climate change mitigation measure and important for promoting healthy communities and reducing obesity.</i></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><i>Routes are being retrofitted to all key destinations and public transport hubs in the County. This retrofitting includes placemaking improvements such as cycle parking, urban greening and street furniture”.</i></p> <p>To:</p> <p><i>“A key aim of Smarter Travel is to ensure that walking and cycling become the mode of choice for local trips. The encouragement of walking and cycling (active mobility):</i></p> <ul style="list-style-type: none"> <li><i>• is a climate change mitigation measure</i></li> <li><i>• important for promoting healthy communities and reducing obesity</i></li> <li><i>• <u>will aid in the evolution of the 10-minute neighbourhood concept</u></i></li> </ul> <p><i>Routes are being retrofitted to all key destinations and public transport hubs in the County. This retrofitting includes <u>improved permeability, removal of barriers</u> placemaking improvements such as cycle parking, urban greening and street furniture”.</i></p> <p><i>Add the following text to the end of Policy Objective T10:</i></p> <p><i><u>“As part of the Development Management process, new development will be required to maximise permeability and connectivity for pedestrians and cyclists and where practicable, retrospective implementation of walking and cycling routes - to maximise permeability and connectivity - may also be required within existing neighbourhoods. (Refer also to Chapter 12 ‘Development Management, Sections, 12.3, 12.4 and 12.8).”</u></i></p>
<p>iv) This Section should refer to the DMURS Interim Advice Note – Covid-19 Pandemic Response as it includes guidance that designers should ensure that measures align with the principles of universal design, consider Government policy on accessibility for people with disabilities and consult people with disabilities to further appraise measures.</p>	<p><b>B0016</b></p>		<p>The Executive welcomes the issue raised.</p> <p>The Department of Transport requests that reference is made to the DMURS Interim Advice Note – Covid-19 Pandemic Response. The Executive supports this request.</p> <p><b>Recommendation</b></p> <p>Amend Section 5.5.1 (p 106) by adding the following sentence at the end of the last paragraph:</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<i><u>"In terms of temporary mobility works the 'DMURS Interim Advice Note – Covid-19 Pandemic Response', 2020 is the relevant national advice."</u></i>
v) Safer routes to school should be included in policy for all schools, along with reduction of speeds to 30 km/hr around schools.	<b><u>B0406</u></b>		<p>The Executive notes the issue raised.</p> <p>The setting of speed limits is through Bye laws and is a reserved function. In this regard there is an ongoing review of speed limits. <b>This is not a County Development Plan issue.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
vi) The walkway/cycle way from the Kilgobbin Road over the M50 roundabout and on into the Sandyford Estate area should be identified on Map 6.  The walkway/cycleway to Stepside should be shown through the Clay Farm Estate on Map 9.	<b><u>B0002</u></b>	6	<p>The Executive notes the issue raised and welcomes the interest in the Sandyford cycle and pedestrian Route (Kilgobbin/Drummartin Link Road) which has recently been constructed.</p> <p>The Executive also welcomes the interest in the new Cruagh Wood Greenway. This important link is shown indicatively on the Ballyogan Local Area Plan 2019-2025 and also on the Council website <u>Active Travel Map</u>.</p> <p>The Draft Plan does not show all walking and cycling paths/routes for a number of reasons:</p> <ul style="list-style-type: none"> <li>• The planning and construction of new cycle and pedestrian routes is evolving at a fast pace and consultation on Active Travel routes is ongoing by the Council.</li> <li>• The Council is working with the NTA on an updated cycling network for the County.</li> <li>• There are a large number of existing and proposed cycle and pedestrian routes throughout the County some are on or adjoining the carriageway while others are off road. It is not possible to show all of these routes as it would clutter the Draft Plan maps.</li> <li>• Some off road cycling and walking links are shown in the Green Infrastructure Strategy (Appendix 15) and cycle links are also shown in some Local Area Plans.</li> <li>• Cycle Policy including mapping is shown on the Council website.</li> </ul> <p><b>This is not a County Development Plan issue.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
vii) A good pedestrian and cycle link from Belmont Estate to Old Kilgobbin Road is required.	<b><u>B0003</u></b>	6	<p>The Executive notes the issue raised and welcomes the interest in improving pedestrian and cycle networks. <b>While it is noted that this is not a County Development Plan issue</b>, a cycle link has recently been constructed between Belmont Estate to Old Kilgobbin Road.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
viii) Submission suggests a pilot programme focusing on pedestrians in a number of residential estates in Dundrum	<b><u>B1214</u></b>		<p>The Executive notes the issue raised.</p> <p><b>This is not a Development Plan issue but a Traffic Management and Active Travel issue.</b> Pilot filtered permeability schemes are being trialled in Drummartin Park, Knocknashee and Eden Park Road. In due course it is anticipated that further similar projects will be carried out.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
ix) A proper path and cycle from the junction of Kingston Estate to the shops at the Coach House in Ballinteer is required.	<b><u>B0007</u></b>		<p>The Executive notes the issue raised and welcomes the interest in improving pedestrian and cycle networks.</p> <p>Section 5.5 of the Draft sets out policy with regard to improving cycling and walking infrastructure in the County and in this regard, it is policy to retrofit routes to all key destinations and public transport hubs. The provision of a path and cycle link from the junction of Kingston Estate to the shops at the Coach House in Ballinteer would be an operational matter for the Parks and Traffic section of the Council. <b>It is not a County Plan issue.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>x) In the vicinity of the Dundrum Road the following issues are raised:</p> <ul style="list-style-type: none"> <li>• Considers that Dundrum Road needs to be improved in terms of road safety including the provision of a cycle lane and safer pedestrian facilities.</li> <li>• Consider including a permeability link under the Dundrum Luas Bridge from Joe Daly's</li> </ul>	<b><u>B0028</u></b> <b><u>B0529</u></b> <b><u>B1214</u></b>	1	<p>The Executive notes the issue raised and welcomes the interest in improving the cycle network and road safety.</p> <p>Section 5.5 of the Draft sets out policy with regard to improving cycling and walking infrastructure in the County; and in this regard it is policy to retrofit routes to all key destinations and public transport hubs. An Area Based Transport Assessment is being carried out as part of the preparation of the Dundrum Local Area Plan jointly funded by the Council and NTA and the issues of cycle and pedestrian needs, road safety and permeability will be</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>connecting to the Luas steps and further permeability links through the Old Glass Bottle site and the central mental hospital.</p> <ul style="list-style-type: none"> <li>• Create a walkway cum cycle route from the site of the current Central Mental Hospital, through Taney Green and Crescent with a pedestrian crossing to Taney Drive and an enlarged, upgraded, and very well-lit underpass of the Luas, linking the Luas station walkway to the Village.</li> </ul>			<p>considered. In addition to this permeability is considered on a case by case basis in the Development Management process. <b>They are not County Development Plan issues.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xi) A new pedestrian and cycle link needed from Rathmichael Road towards the Luas station at Cherrywood Business Park passing under the existing M50 motorway bridge and crossing the R116 Brides Glen road and valley via a new combined foot and cycleway bridge.</p> <p>Would welcome easier access to the Bride's Glen Luas station from the Ballycorus road.</p>	<p><b><u>B0048</u></b> <b><u>B1159</u></b></p>	<p>10</p>	<p>The Executive notes the issue raised and welcomes the interest in improving the cycle and pedestrian network. Section 5.5 of the Draft sets out policy with regard to improving cycling and walking infrastructure in the County. The planning and construction of new cycle and pedestrian routes is evolving at a fast pace and consultation on Active Travel routes is ongoing. The Council is working with the NTA on an updated cycling network for the County as part of the strategy for the GDA.</p> <p>However, with regard to the proposed new link, there is no strong evidence based rational for the proposed route selection with a start point on what is currently a rural road, albeit one earmarked for future development. The proposed structure which is lengthy and, in some parts complex, then proceeds to cross some areas zoned objective G – To protect and improve high amenity area.</p> <p>There is already in existence a temporary route from the Bride's Glen Luas stop to the Glencarrig housing estate that was granted permission under the application for a temporary car park at this location (DZ17A/0417). A permanent route for pedestrians and cyclists is to form part of a future planning permission for the development of lands in Cherrywood and will be delivered under a future grant of permission for lands, thereby allowing direct access from Cherrywood Avenue to Ballycorus Road. In addition, the provision of an additional access route is to be delivered by DLRC under the URDF call 1 Linear Park project. Ballycorus Road is to be linked to the Linear Park Greenway network, refer also to Map 6.6.</p> <p>The Rathmichael area is earmarked for a local area plan which will guide future development and it is respectfully considered that the proposal for what would be an expensive piece of</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>infrastructure is both premature, as it through the future local Area Plan that more detailed site frameworks for future development and movement patterns associated with same will be put in place, and unwarranted as a temporary link is already in place and there are plans for two permanent links to Cherrywood The future extension of the Luas line may mean that it makes more sense to provide additional permeability link to a location along the extended line. Any structure of this nature passing under the M50 would require consultation and agreement with both the TII and the NTA.</p> <p>Based on prematurity, the fact that a link already exists from the Luas to the Glencarrig Estate and that two permanent links are planned it is not recommended that this proposal be included in the Draft Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
xii) Cycle paths should be safely set back and constructed on flat corridors along with cycle parking in the vicinity of services and amenities.	<b><u>B0053</u></b>		<p>The Executive notes the issue raised.</p> <p>Section 5.5 of the Draft sets out policy with regard to improving cycling infrastructure in the County; and in this regard it is policy to retrofit routes to all key destinations and public transport hubs. The route and level of segregation of cycle lanes is designed on a case by case basis in accordance with the DMURS and the National Cycle Manual including subsequent updates. The Council has an ongoing programme of providing more cycle parking where needed at key destinations. <b>This issue is a detailed design issue and not a County Development Plan issue.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
xiii) Request improved cycle infrastructure between Belarmine/Stepaside M50, Kilgobbin and city centre.	<b><u>B0061</u></b>	9	<p>The Executive notes the issue raised and welcomes the interest in improving cycle networks.</p> <p>Section 5.5 of the Draft sets out policy with regard to improving cycling and walking infrastructure in the County and in this regard, it is policy to retrofit routes to all key destinations and public transport hubs. The route and level of segregation of cycle lanes is designed on a case by case basis in accordance with the DMURS and the National Cycle Manual including subsequent updates. A cycle link has been constructed between Belmont</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>Estate to Old Kilgobbin Road and onto the Kilgobbin Road this has improved permeability in the area. <b>It is not a County Development Plan issue.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xiv) Requests more protected cycle lanes, especially on Sandyford road this would provide safe access to schools in the area and Dundrum Town Centre.</p>	<b><u>B0086</u></b>	10	<p>The Executive notes the issue raised and welcomes the interest in improving cycle networks. Section 5.5 of the Draft sets out policy with regard to improving cycling and walking infrastructure in the County and in this regard, it is policy to retrofit routes to all key destinations and public transport hubs. level of segregation of cycle lanes is designed on a case by case basis in accordance with the DMURS and the National Cycle Manual including subsequent updates. The Council is rolling out a number of initiatives on active mobility and this includes safe cycling to schools and places of work. The planning and construction of new cycle and pedestrian routes is evolving at a fast pace and consultation on Active Travel routes is ongoing and the Council is working with the NTA on an updated cycling network for the County. <b>This is not a County Development Plan issue.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xv) Requests Sandyford village be made one way with a contra flow bike lane.</p>	<b><u>B0086</u></b>	10	<p>The Executive notes the issue raised.</p> <p><b>This is not a County Development Plan issue but a traffic management issue.</b> This year some temporary reallocation of road space is being carried out in Sandyford village for the purpose of supporting business with the provision of outdoor dining space.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xvi) Various submissions offer advice to DLR on how cycle lanes should be designed. Issues are raised such as:</p> <ul style="list-style-type: none"> <li>• commuter cycle path should follow a direct route, be sheltered from strong winds, and have passive surveillance.</li> <li>• built-out junctions, cement "islands" are a concern and roundabouts design especially</li> </ul>	<b><u>B0091</u></b> <b><u>B0337</u></b> <b><u>B0810</u></b>		<p>The Executive notes the issue raised.</p> <p><b>This is not a County Development Plan issue but a design issue.</b> Cycle routes are designed on a case by case basis in accordance with the DMURS and the National Cycle Manual 2011 including subsequent updates. A number of roundabouts are being reviewed this year to increase their accessibility for walking and cycling.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> <li>• - Dalkey Roundabout</li> <li>• - The Graduate Roundabout</li> <li>• - The Glenageary roundabout</li> <li>• - The Monkstown Roundabout</li> <li>• - The T.E.K Roundabout (Stradbrook Road)</li> </ul>			<p>The issue of roundabouts is also addressed below in Section 3.14 regarding the reinstatement of SLO160 of the 2016 County Development Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xvii) A more wide-ranging and integrated whole-town approach to cycling, walking and traffic management in Dún Laoghaire town and on the coast is needed to address inadequate, unsafe infrastructure.</p> <p>Traffic has increased on Tivoli Road since the Coastal Mobility Route (CMR) went in</p> <p>There is an urgent need for safe infrastructure on Tivoli Road to protect children who are walking, cycling and scooting, should be a priority if DLRCC are promoting safe travel to school on a congested road with 3 schools.</p>	<p><b><u>B0293</u></b> <b><u>B0747</u></b></p>		<p>The Executive notes the issue raised.</p> <p><b>This is not a County Development Plan issue but a traffic management and design issue.</b> Tivoli Road is challenging given the narrow width and overall the network in the area is constrained. Some traffic calming was previously carried out.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xviii) Concern that insufficient attention is being given to the River Dodder, in terms of progressing of cycle ways or walkways/Greenways in the Draft Plan and it is absent on the Draft maps.</p>	<p><b><u>B0017</u></b></p>	<p>1</p>	<p>The Executive notes the issue raised. Design work on the Dodder Greenway is being led by Dublin City Council; there has been delay due to the Covid 19 Pandemic. It is anticipated that the design will go to public consultation in 2021. The Dodder Green Way is shown in Appendix 15 - Green Infrastructure Strategy on Drawing no A13 Link and Off Road Cycle Routes and is referred to in Policy Objective T12: County Cycle Network page 107 in the Draft.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xix) Welcomes recent work on behalf on pedestrians/ cyclists over the past 6 months. Travel to Dundrum Village or Town Centre should be by foot, cycle or public transport. Travel by car should be a last resort and should be financially penalised.</p>	<p><b><u>B1214</u></b></p>		<p>The Executive welcomes the positive feedback. While there is a high level of emphasis on sustainable modes in the Plan the Council provides for all modes of transport.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>xx) A number of submissions were received which referred to specific cycle routes as follows:</p> <ul style="list-style-type: none"> <li>a) UCD – cycle lane from Booterstown Dart Station to UCD.</li> <li>b) Woodbine/Trimleston –should be made one way, traffic calming and modal filters.</li> <li>c) Trimelton/Fosterbrook - a permeability link is needed to allow access for pedestrians/cyclist to have a more direct link to local schools.</li> <li>d) Cross Ave – should be made one way between Chesterfield and Blackrock College.</li> <li>e) Booterstown Ave-Cross Ave slow traffic down, provide curb segregated bike lanes.</li> <li>f) Make Booterstown Avenue lower one way.</li> <li>g) Blackrock Park (SLO 12) wide pedestrian and cycle links to Blackrock village and DART station.</li> <li>h) Stillorgan – no safe cycling up or down to N11 and N11 from Brewery Road to Stillorgan Road is substandard.</li> <li>i) Monkstown/Dún Laoghaire – SLO 29 – Deansgrange LAP needs to priorities active travel and the 'Park to Park' route needs to be an SLO."</li> <li>j) More priority should be given to pedestrian and cyclists in Dún Laoghaire harbour and both sides of the coastal mobility route should be connected by reallocating space on Crofton Road in front of the DLR council.</li> <li>k) Sandyford/Foxrock - segregated cycling lanes, with priority cycle traffic lights are required on the N11/Leopardstown Road junction and the extra traffic lane on the N31 should be reallocated to cycling.</li> </ul>	<p><u><b>B0319</b></u>  <u><b>B0406</b></u>  <u><b>B0491</b></u>  <u><b>B0689</b></u>  <u><b>B0765</b></u>  <u><b>B0885</b></u>  <u><b>B0905</b></u>  <u><b>B0988</b></u>  <u><b>B1085</b></u>  <u><b>B1177</b></u>  <u><b>B1189</b></u>  <u><b>B1192</b></u>  <u><b>B1209</b></u>  <u><b>B1155</b></u></p>		<p>The Executive notes the issues raised and welcomes the considerable interest in cycling improvements in the County.</p> <p>Some of the cycle routes referred to, in submissions, are part of the County Cycle Network, while others are part of the GDA Cycle Network (which is current being reviewed by the NTA in consultation with the Council). The delivery of cycling routes is ongoing, and the proposals submitted have been referred for consideration to the service department, for review and update of the cycle network.</p> <p>It is generally not considered necessary to develop specific local objectives to provide for specific active travel routes as these are often localised issues and Policy Objectives T10 – T13 explicitly set out the Policy Objectives to deliver cycling and walking infrastructure.</p> <p>The delivery of specific cycle schemes is an ongoing operational issue for several departments in the Council; Infrastructure and Climate Change, Municipal Services and Community and Cultural Development Departments, subject to funding and is <b>not a County Development Plan issue</b>.</p> <p>However, the following updates have been provided by way of response where information is available with regard to a specific proposal from the Active Travel Section of the Department of Infrastructure and Climate Change. The delivery of this infrastructure is evolving all the time and this response pertains to a point in time (July 2021):</p> <ul style="list-style-type: none"> <li>a) A scheme entitled 'UCD to Dart' was delivered a number of years ago. Providing cycle parking within the UCD campus is outside of the remit of the Council.</li> <li>b) The Council is engaging with residents' groups in Woodbine/Trimleston.</li> <li>c) A new link between Coláiste Íosagáin and St Helens Wood was completed last year.</li> <li>d) Cross Ave is part of the County Cycle Network and provides an important link. It will be developed in line with the priority of the network</li> <li>e) No update available.</li> <li>f) No update available.</li> </ul>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>l) Various detailed proposals to cycle access and egress to South County Business Park and Central Park and also the extra traffic lane on Burton Hall Road should be converted into a cycle track.</p> <p>m) Ballyogan/Carrickmines and Sandyford – need for cycle parking, segregated cycle lanes, permeability links to join up these areas and link to LUAS.</p> <p>n) Consider a cycle lane for Foster Avenue should be provided.</p> <p>o) Seapoint Ave cycle track is a great success would like a similar track (fully segregated) on Monkstown Road.</p> <p>p) An orbital route with curb separated cycle lanes from Eden Rd-&gt;Corrig Road-&gt;Tivoli-&gt;Monkstown Ave-&gt;Rowanbryn and onward to join Dalkey with Dundrum.</p> <p>q) Curb separated cycle lanes from Kill Ave from Foxrock Church-&gt;Deansgrange-&gt;Bakers Corner-&gt;Kill Lane-&gt;Mount town Roundabout-&gt;York Rd-&gt;Crofton Road.</p> <p>r) Churchview Road in Killiney/Ballybrack to Wyattville Road.</p> <p>s) Johnstown Road from Pottery Rd to Rochestown Ave.</p> <p>t) Join the contraflow bike lane at Maretimo Terrace/Idrone Terrace in Blackrock with that on the Main Street.</p> <p>u) Safe cycling between Honeypark, Cualanor and Dún Laoghaire town.</p> <p>v) SLO 30 Better cycling infrastructure should be provided for the DLIADT, including a dedicated</p>			<p>g) This has been delivered with the exception of the laneway to the DART. The Executive is aware that the laneway at the Dart Station presents a barrier to the current cycle network.</p> <p>h) There are a number of schemes currently being progressed along the east west corridor in 2021. It is intended to progress a route from Barton Road East all the way through to the TEK Roundabout</p> <p>i) Deansgrange Road is an objective of the GDA Cycle Network and as part of the Active School Travel, one of the options being considered is a one way system.</p> <p>j) The Coastal Mobility Route is a temporary scheme. If the scheme is made permeant segregation along its entire length would be considered.</p> <p>k) The NTA have allocated funding in 2021 for a review of Leopardstown Road up to the N11.</p> <p>l) There are a number of projects being progressed in the Sandyford Urban Framework Plan area this year.</p> <p>m) This is being progressed this year</p> <p>n) No update available.</p> <p>o) Monkstown Road has geometric constraints that would not enable the provision of segregated cycle facilities. If the road was made one way this could potentially be incorporated but this would have significant impact on the bus network and local accesses.</p> <p>p) As o) above and there is a scheme this year to progress the network up to the York Road and Tivoli road junction.</p> <p>q) Kill Ave and Mounttown Road are being reviewed this year. Kill Ave to Deansgrange was segregated last year. There is an objective to segregate Kill Lane up to the N11 but this is not currently programmed.</p> <p>r) This is being progressed this year.</p> <p>s) There is a segregation scheme being progressed this year.</p> <p>t) Connecting the Main Street to the contra flow is not part of the County or GDA Network.</p> <p>u) No update available.</p> <p>v) This route would be through Culanor – Honeypark and Kill Ave (which is being reviewed this year).</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>cycling lane from Dún Laoghaire Dart station to the campus.</p> <p>w) SLO 43 –Clonkeen Park the paths should be delineated to separate cyclist and pedestrians.</p> <p>x) Cycling infrastructure needs to be improved on Rochestown Ave, Sallynoggin village and Johnstown Ave. Suggest an SLO with the following wording:  <i>” To introduce fit-for-purpose pedestrian and cycle facilities in Sallynoggin that will link to adjacent neighbourhoods and village centres, and that will enable people to access retail and recreational space, educational facilities, and employment zoned areas by active transport.”</i>                      Also improve the directional signage.</p> <p>y) Request the inclusion of a specific SLO on protecting the Mountains to Metals active travel route, with the following suggested wording: “To introduce traffic calming measures and reduce the vehicular traffic flow through O’Rourke Park, Sallynoggin, to safeguarding the Mountains to Metal safe walking and cycling route”</p> <p>z) SLO 68 (linear park Loughlinstown River)- request a time line for this</p> <p>aa) SLO 70 Killiney Hill Park would welcome measures to prioritise people arriving by active travel and the introduction of permanent vehicular traffic restrictions at certain times.</p> <p>bb) Barnhill Road should be redesigned to make it safer for cyclists. More cycle parking requested near AIB in Dalkey and also traffic restrictions around Loreto Dalkey to improve pedestrian and cycle safety.</p>			<p>w) Segregating paths would require at least 5m (2m path + 3m two way). This is a significant removal of green space. There is a balance between removing that space and the need for that capacity.</p> <p>x) Active School Travel route passes through Sallynoggin.</p> <p>y) Active School Travel route passes through Sallynoggin.</p> <p>z) No update available</p> <p>From aa) to ee), no update available or has been previously answered in a) – z).</p> <p><b>Recommendation</b>                      No change to Draft Plan</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>cc) Safe cycling and walking routes in the Shankill area should be prioritised.</p> <p>dd) The completion of a pedestrianised/cycle Link joining Meadowbrook, Ballawley Park, the Town Centre, the Village Centre, Finsbury Park/ Weston, Super Valu Churchtown, and Nutgrove would be beneficial.</p> <p>ee) Requests that signs are erected along shared pedestrian cycle routes showing where pedestrians have right of way and to 'go slow'.</p>			
<p>xxi) Cherrywood SDZ cycling infrastructure is insufficient and should be redesigned for all ages and abilities including the links to the N11.</p>	<b><u>B0319</u></b>		<p>The Executive notes the issue raised. The proposed cycling infrastructure plans are set out in the Cherrywood Planning Scheme 2014. The Cherrywood Planning Scheme is made and amended under a separate legislative process to the County Development Plan and hence <b>the issue raised is not considered to be a County Development Plan issue.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xxii) With regard to Glashule Village various improvements are requested to the public realm including signage, lighting, paths car and cycle parking and seating.</p>	<b><u>B1147</u></b>	<b>3 4</b>	<p>The Executive notes the issues raised.</p> <p><b>These are not Development Plan issue but are operational issues.</b> Temporary Covid-19 works have been carried out in the village to make more space available for pedestrians at pinch points, to support businesses and increase the attractiveness of the public realm.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>xxiii) The proposed additional crossing points for pedestrians and bikes over the M50 should be progressed as a priority.</p> <p>DLR should connect the Cruagh Greenway to the mountains to the metals cycleway being developed with the unused bridge over the M50 should be developed to construct a cycle way between Jamestown and Stepaside.</p>	<b><u>B1079</u></b> <b><u>B1099</u></b>		<p>The Executive notes with the issues raised.</p> <p>Table no 5.2 on page 107 of the plan lists pedestrian/cycle foot bridges over the M11/ M50 (including the HRI bridge) where it is an important objective to increase permeability over the M50 which at present is a significant barrier to development.</p> <p>The NTA in their submission on the Draft have also referred to the importance of overcoming the severance of these two national routes “will be critical in enabling sustainable transport</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>use and reducing the reliance on the private car" and that they support the approach taken in the plan in this regard.</p> <p><b>The connection of the Cruagh Greenway to the mountains to metals route is not a Development Plan issue.</b></p> <p><b>Recommendation</b> No change to Draft Plan</p>
xxiv) Residential streets which are used for rat runs should be installed with filtered permeability subject to a plebiscite.	<b>B1205</b>		<p>The Executive notes with the issues raised.</p> <p><b>The issue raised is a traffic management issue and hence are not County Development Plan issues.</b> These cases are dealt with on a case-by-case basis in accordance with the Neighbourhood Traffic Management Guidelines procedure.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
xxv) Oppose any pedestrian walkway or footbridge being constructed from Sweetmount Park/The Laurels across to Main Street or the Dundrum Village Centre over the Dundrum Bypass.	<b>B1021</b>	1	<p>The Executive notes the issue raised.</p> <p>An Area Based Transport Assessment is being carried out as part of the preparation of the Dundrum Local Area Plan and the issues of cycle and pedestrian needs and road safety will be considered. In addition, to this permeability is considered on a case by case basis in the Development Management process. <b>This is not a County Development Plan issue.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.5.3.2: Policy Objective T11: Footways and Pedestrian Routes</b>			
i) Figure 5.3 shows a prioritisation of users in terms of transport provision. The plan does not state that this prioritisation of users is the policy of the council.	<b>B0749</b>		<p>The Executive notes the issue raised. Figure 5.3 on page 106 is the User Hierarchy as set out in DMURS. As compliance with DMURS is national policy, the Council must comply with same.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.5.3.3: Policy Objective T12: County Cycle Network</b>			

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>i) Policy Objective T12: County Cycle Network should be either:</p> <ul style="list-style-type: none"> <li>deleted from the Development Plan in its entirety; or</li> <li>amended to remove reference to the "Dún Laoghaire-Rathdown Cycle Network Review"; or</li> <li>amended to clarify that the securing of improvements to the County Cycle Network is subject to DLRCC being legally entitled to carry out the works / development necessary to do so. This clarity can be achieved by inserting the words "(subject to the Council being legally entitled to do so)" between "Cycle Network Review" and "whilst supporting the NTA..."</li> <li>DLRCC's proposed implementation of the Active School Travel Programme, and the inclusion of Policy Objective T12 demonstrate that DLRCC proposes to establish a specific Policy Objective which will require it to demolish the boundary wall between the Belmont and Ardagh estates which the Council does not have ownership of.</li> </ul>	<p><b>B0149</b></p>	<p>6</p>	<p>The Executive notes the issue raised which appears to relate specifically to the proposed cycle route which runs from Ardagh Crescent to Belmont Lawn. This route forms part of the County Cycle Network which went through a process of public engagement in 2012. The Council are currently in the early stages of the preliminary review of the cycle network.</p> <p>The route from Ardagh Crescent to Belmont Lawn is part of the "Mountains to Metals" route of the Active School Travel Programme. As part of the Active School Travel this route has been through a process of public engagement.</p> <p>In the report on public engagement completed in December 2020 the Council committed to carrying out further engagement with local residents to deal with their concerns and implement the routes in a considerate manner while safeguarding the amenity of the green space within Belmont Lawn and supporting the current use and character of the space. The delivery of this link is currently paused pending the acquisition of the relevant lands.</p> <p>Policy Objective T12: County Cycle Network states:  <i>"It is a Policy Objective to secure improvements to the County Cycle Network in accordance with the Dún Laoghaire-Rathdown Cycle Network Review whilst supporting the NTA on the development and implementation of the Greater Dublin Area Cycle Network Plan, subject to environmental assessment. (Consistent with RPO 5.2, 5.3 of the RSES)"</i></p> <p>Issues regarding ownership are not County Development Plan matters however, it is considered appropriate to clarify the Policy Objective 12 by referring to route feasibility as an acknowledgement that there may in some locations be feasibility issues to the delivery of routes. The forthcoming review should also be referenced</p> <p><b>Recommendation</b>  Amend Policy Objective T12 as follows from:</p> <p><i>"It is a Policy Objective to secure improvements to the County Cycle Network in accordance with the Dún Laoghaire-Rathdown Cycle Network Review whilst supporting the NTA on the development and implementation of the Greater Dublin Area Cycle Network Plan, subject to environmental assessment. (Consistent with RPO 5.2, 5.3 of the RSES)"</i></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>To</p> <p><i>"It is a Policy Objective to secure improvements to the County Cycle Network in accordance with the Dún Laoghaire-Rathdown Cycle Network Review whilst supporting the NTA on the development and implementation of the Greater Dublin Area Cycle Network Plan (or any updates to same), subject to environmental assessment and route feasibility. (Consistent with RPO 5.2, 5.3 of the RSES)".</i></p>
<p>ii) Submission suggests that the Policy Objective T12 be amended to support the development, maintenance and enhancement of trails and routes in co-operation with Sports Council, NTA, NTO, NWMWAC, Heritage Council and other bodies to develop cycle touring routes including those linking with adjoining counties particularly in areas of high amenity.</p>	<p><b>B0594</b></p>		<p>The Executive notes the issues raised in this comprehensive submission.</p> <p>There is a suite of policies which support recreational cycling and touring in the Draft Plan, as well as greenways, tourism and recreation as set out in the following Policy Objectives:</p> <ul style="list-style-type: none"> <li>• Policy Objective T10: Walking and Cycling</li> <li>• Policy Objective T12: County Cycle Network</li> <li>• Policy Objective T13: Coastal Cycling Infrastructure</li> <li>• Policy Objective T14: Bike Rental Schemes</li> <li>• Policy Objective E16: Tourism and recreation</li> <li>• GIB 15: Recreation Access Routes</li> <li>• Policy Objective OSR8: Greenways and Blueways</li> </ul> <p>In addition, Appendix 15 Green Infrastructure sets out recreational car free and greenways throughout the County.</p> <p>Policy Objective T10 supports the NTAs GDA Cycle Network which in turn includes a range of cycle touring routes. The NTAs Cycle Network is under review at present. The Council supports the development of the Dodder Green Way and the East Coast Trail which are two important routes which link into adjoining Counties.</p> <p>It is considered that the amended Policy Objective is not required.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<b>3.5.3.4: Policy Objective T13: Coastal Cycling Infrastructure</b>			
<p>i) The National East Coast cycle trail section on the Vico Road should not be a dedicated cycle lane as it is already a good road biking route. The coastal cycle route to Dún Laoghaire should be left the way it was previously.</p> <p>A cycle lane along the Dart line through from Seapoint to the metals should be provided for slow moving cyclists.</p>	<b><u>B0025</u></b>	2 3 4	<p>The Executive notes the issue raised.</p> <p>Section 5.5.4 of the Draft sets out policy with regard to the East Coast Trail. It will be subject to a feasibility study including an assessment of the route options. With regard to the Coastal Mobility Route, the Council is reviewing this route with input from an independent assessment of the route. The policy approach of the Council is inclusive and focuses on catering for all cyclists and does not differentiate between differing speeds of cyclists.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) The Coastal cycling route is being developed at the expense of the car and bus. This will negatively impact on tourists and visitors who wish to enjoy the views of Dublin Bay.</p>	<b><u>B0037</u></b> <b><u>B1096</u></b>	2 3 4	<p>The Executive notes the views expressed in the submission.</p> <p>Section 5.5.4 of the Draft sets out policy with regard to the East Coast Trail. It will be subject to a feasibility study including an assessment of the route options. With regard to the Coastal Mobility Route, the Council is reviewing this route with input from an independent assessment of the route. The Council considers all road users in accordance with the user hierarchy of the Design Manual for Urban Roads and Streets (DMURS) and the design of individual projects is on a case by case basis in accordance with the principles set out in DMURS and the National Cycle Manual.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
iii) Submission raise issues in relation to S2S as follows: <ul style="list-style-type: none"> <li>• Concerned at the proposal to drop the S2S cycle route and replace it with the East Coast Trail, it should go into the Plan.</li> <li>• Both the commuter cycleway on existing roads and the S2S as envisaged in earlier development plans are required (cycle and walkway on the coast).</li> <li>• The walkway which adjoins Blackrock Park should be extended so that there is a promenade with similar benefits to the promenade at Salthill (Galway).</li> <li>• Would be a great tourist attraction and a greenway, business opportunity.</li> <li>• The Blackrock to Sandycove temporary route is very popular – it should be kept on a permanent basis as part of the S2S.</li> <li>• Commitments should be made to develop the S2S during the plan period.</li> <li>• 80% of the route is in place and it is short sighted not to complete.</li> <li>• The S2S should be incorporated into a new seawall to protect the railway which is under threat due to rising sea levels and storms.</li> <li>• Provide a commitment to provide a cycleway the whole way along the coast, liaising with Wicklow County Council to complete the Shanganagh Park to Bray portion</li> <li>• Problem with regard to lack of co-ordination in the delivery of transport project close to the seafront between Merrion Gates and Dún Laoghaire. Delivery of DART protection works, Bus Connects and S2S should be combined, Merrion gates overpass should be re-examined.</li> </ul>	<u>B0087</u> <u>B0088</u> <u>B0090</u> <u>B0092</u> <u>B0093</u> <u>B0100</u> <u>B0103</u> <u>B0105</u> <u>B0106</u> <u>B0153</u> <u>B0269</u> <u>B0276</u> <u>B0279</u> <u>B0287</u> <u>B0311</u> <u>B0319</u> <u>B0322</u> <u>B0325</u> <u>B0327</u> <u>B0406</u> <u>B0460</u> <u>B0477</u> <u>B0489</u> <u>B0491</u> <u>B0601</u> <u>B0689</u> <u>B0765</u> <u>B0782</u> <u>B0792</u> <u>B0853</u> <u>B0885</u> <u>B1024</u> <u>B1051</u> <u>B1200</u>	2 3 4	<p>The Executive notes the issues raised.</p> <p>Policy Objective T13: Coastal Cycling Infrastructure and SLO 18 refer to Dublin Bay Trail and the National East Coast Trail. The Proposed Sutton to Sandycove Walkway/Cycleway (S2S) is still an objective of DLR. To this end it should be noted that the Draft Plan maps refer to "Proposed Sutton to Sandycove Walkway/Cycleway as a component part of the national East Coast Trail Cycle Route." It is considered appropriate to amend the text of the Plan to refer to the Proposed Sutton to Sandycove Walkway/Cycleway (S2S).</p> <p>The S2S project ends at Sandycove and that the East Coast Trail is a scheme that extends beyond our County. While there are segregated facilities in place (albeit on the road side of the rail line) it may be more appropriate to progress other elements of the East Coast Trail to create a functional route while the issues around habitats and other constraints are worked through.</p> <p><b>Recommendation</b>  <i>Make the following amendment to 5.5.4 Policy Objective T13: Coastal Cycling Infrastructure (page 107) from:</i></p> <p><i>It is a Policy Objective of the Council to promote the development of Dublin Bay Trail from the boundary with Dublin City to Wicklow County as a component part of the National East Coast Trail Cycle Route.</i></p> <p>To:</p> <p><i>It is a Policy Objective of the Council to promote <u>the development of the Sutton to Sandycove Promenade and Cycleway</u>, as a component part of the National East Coast Trail Cycle Route and also the Dublin Bay trail from the boundary with Dublin City to Wicklow County.</i></p> <p><i>Amend Specific Local Objective (SLO) 18 in Maps 2, 3, 4, 7, 10 and 14 in Chapter 14 from:</i></p> <p><i>"To promote the development of the Dublin Bay Trail as a component part of the National East Coast Trail Cycle Route up to the boundary with Co. Wicklow. Any development proposals shall be subject to Appropriate Assessment Screening in accordance with the requirements of the EU</i></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<ul style="list-style-type: none"> <li>All the various projects at the coast need to be looked at in combination as per the NPWS Appropriate Assessment Guidance</li> <li>Delivery of S2S is being hampered by concerns relating to SAC and SPA.</li> <li>Covid mobility measures have overtaken all of the debate and cycle facilities are mostly on-road – Draft Plan is putting this forward as the same thing as the coastal route. Loss of habitat and disturbance to birds is overstated.</li> <li>Supports the S2S project and its delivery during the lifetime of the proposed Plan 2022-2028. Important in terms of tourism, health, safe and scenic routes and could incorporate the coastal defenses which Dublin City and County will need.</li> <li>If Sandycove is to be the southern terminus of the S2S cycleway and/or a component part of the National East Coast Trail cycle route this will bring even more pressure to bear on the area.</li> <li>S2S should not be moved away from the seafront. The "inland" proposals are unsafe and will bring hardship to many residents and businesses of DLRCC. Considers that the deviations from the S2S imposed in Blackrock last summer show the very real impact on the local businesses.</li> </ul>	<p><b><u>B1205</u></b></p>		<p><i>Habitats Directive to ensure the protection and preservation of all designated SACs, SPAs, and pNHA(s) in Dublin Bay and the surrounding area.”</i></p> <p>To:</p> <p><i>““To promote the development of the <del>Dublin Bay Trail</del> <u>Sutton to Sandycove Promenade and Cycleway</u>, as a component part of the National East Coast Trail Cycle Route and also the <u>Dublin Bay trail from the boundary with Dublin City up to the boundary with Co. Wicklow</u>. Any development proposals shall be subject to Appropriate Assessment Screening in accordance with the requirements of the EU Habitats Directive to ensure the protection and preservation of all designated SACs, SPAs, and pNHA(s) in Dublin Bay and the surrounding area”.”.</i></p>
<p>iv) With regards to the Sandycove there have been multiple submissions which raise issues with regard to the Coastal Mobility Route as follows:</p> <ul style="list-style-type: none"> <li>Acknowledge the volume of traffic related issues in Sandycove.</li> </ul>	<p><b><u>B0203</u></b> <b><u>B0326</u></b> <b><u>B0490</u></b> <b><u>B0492</u></b> <b><u>B0520</u></b> <b><u>B0525</u></b> <b><u>B0537</u></b></p>	<p>4</p>	<p>The Executive notes the issues raised.</p> <p><b>The issues raised are not County Development Plan issues but relate to operational issues across a range of Sections the main ones being Parking and Traffic Management.</b></p> <p>The Council is in consultation with the residents in Sandycove with regard to these issues.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> <li>• Support the Coastal Mobility Route but not the resulting traffic congestion in Sandycove that needs to be resolved by the Council.</li> <li>• Seeking the protection of the unique character and heritage of the area for the benefit of residents, local businesses and visitors.</li> <li>• Annual problems with traffic and illegal parking, and with the pandemic, the issues have been exacerbated by the increase in visitors and removal of parking spaces by the CMR.</li> <li>• Suggest that the CMR should have had a different design to minimise congestion.</li> <li>• The Sandycove loop has become gridlocked and the air quality is impacted with so many cars idling.</li> <li>• Request that these issues around traffic and illegal parking are resolved as a matter of urgency.</li> <li>• Whilst CMR is supported, traffic management issues in Sandycove need to be addressed.</li> <li>• The forty Foot areas should be wheelchair accessible.</li> <li>• More car parking is needed so that the young and old are not excluded.</li> <li>• Concerned with the stability of the slip road and the fragile embankment.</li> <li>• Seek year round lifeguards.</li> <li>• No EIA was undertaken, no traffic analysis was undertaken.</li> <li>• Concerns with regard to toilets</li> <li>• Complementary to all the work DLR have done along the coastal towns for pedestrians and cyclists.</li> </ul>	<p><b><u>B0574</u></b>  <b><u>B0583</u></b>  <b><u>B0665</u></b>  <b><u>B0668</u></b>  <b><u>B0685</u></b>  <b><u>B0687</u></b>  <b><u>B0693</u></b>  <b><u>B0721</u></b>  <b><u>B0753</u></b>  <b><u>B0763</u></b>  <b><u>B0765</u></b>  <b><u>B0774</u></b>  <b><u>B0777</u></b>  <b><u>B0784</u></b>  <b><u>B0786</u></b>  <b><u>B0789</u></b>  <b><u>B0791</u></b>  <b><u>B0841</u></b>  <b><u>B0862</u></b>  <b><u>B0865</u></b>  <b><u>B0903</u></b>  <b><u>B0911</u></b>  <b><u>B0916</u></b>  <b><u>B0917</u></b>  <b><u>B0936</u></b>  <b><u>B0937</u></b>  <b><u>B0945</u></b>  <b><u>B0948</u></b>  <b><u>B0958</u></b>  <b><u>B0961</u></b>  <b><u>B0969</u></b>  <b><u>B0970</u></b>  <b><u>B0982</u></b>  <b><u>B0988</u></b></p>		<p>With regard to the Coastal Mobility Route, the Council is reviewing this route with input from an independent assessment of the route.</p> <p><b>Recommendation</b>  No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> <li>• Complimentary of new cycleway along Seapoint Road.</li> <li>• Supports more place making and making the CMR permanent.</li> <li>• Consider adopting an SLO for Sandycove Point regarding traffic management, visitors, heritage and residents.</li> <li>• In favour of parking permits for residents.</li> </ul>	<u><b>B1006</b></u> <u><b>B1007</b></u> <u><b>B1032</b></u> <u><b>B1036</b></u> <u><b>B1063</b></u> <u><b>B1098</b></u> <u><b>B1104</b></u> <u><b>B1107</b></u> <u><b>B1114</b></u> <u><b>B1139</b></u> <u><b>B1183</b></u> <u><b>B1187</b></u> <u><b>B1192</b></u> <u><b>B1193</b></u>		
<p>v) Submission recommends a rewording from:</p> <p><i>“Any development proposals shall be subject to Appropriate Assessment ..”</i></p> <p>to</p> <p><i>“Any development proposals shall be subject to Ecological Impact Assessment and Appropriate Assessment Screening to ensure the protection and preservation of all designated SACs, SPAs and pNHAs in Dublin Bay and the surrounding area.’, as Appropriate Assessment is not obliged to consider the effects of a proposed project on pNHAs, but only any impacts on European sites”.</i></p>	<u><b>B1247</b></u>		<p>The Executive agrees with the recommendation regarding this issue.</p> <p>It is considered appropriate to add the requirement to require ecological impact assessment in order to ensure that the project will take account of the pNHAs in Dublin Bay and surrounding areas.</p> <p><b>Recommendation</b>  In Section 5.5.4 Policy Objective T13: Coastal Cycling Infrastructure replace the second sentence in the first paragraph in column 1 on page 108 with:</p> <p><i>“Any development proposals shall be subject to Ecological Impact Assessment (where SEA and EIA is being undertaken, the assessments would consider and integrate ecological impacts and a separate, stand alone Ecological Impact Assessment would not be required) and Appropriate Assessment Screening to ensure the protection and preservation of all designated SACs, SPAs and pNHAs in Dublin Bay and the surrounding area.”</i></p>
<p>vi) A number of submissions were received on extending the East Coast Cycle Trail via Corbawn Drive Shankill, raising the following issues:</p>	<u><b>B0112</b></u> <u><b>B0116</b></u> <u><b>B0118</b></u> <u><b>B0119</b></u> <u><b>B0123</b></u>	10	<p>The Executive notes the issues raised and that some submissions are against the East Coast Trail routing through Corbawn while others welcome the proposed routing.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> <li>• Safety and congestion issues relating to the current East Coast Cycle Trail route through Corbawn.</li> <li>• Would disrupt residents of Seafield and Corbawn</li> <li>• Should be fenced either side like the Waterford Greenway</li> <li>• Welcomes DLR's commitment for a feasibility study to re-route the East Coast Cycle trail by the coast at Corbawn and incorporate into coastal protection works between Corbawn Lane and the new Woodbrook Dart station.</li> <li>• A cycle way through Corbawn Drive would only be used by leisure cyclists and therefore wouldn't achieve modal change.</li> <li>• Needs of the residents should be considered before cyclists, particularly settled neighbourhoods.</li> <li>• Limited road space on Corbawn Drive with cars parked on both sides of this narrow road, a growing number of young children living on the road and an increasing number of walkers heading to the local parks which cannot also accommodate a 3-4 m cycleway.</li> <li>• A balanced approach is needed in terms of the needs of residents and visitors.</li> <li>• A cycle route on the coast would limit the impact on local residents and protect the country lane aspect of Quinn's Road as it</li> </ul>	<p><b><u>B0124</u></b>  <b><u>B0151</u></b>  <b><u>B0200</u></b>  <b><u>B0227</u></b>  <b><u>B0315</u></b>  <b><u>B0331</u></b>  <b><u>B0352</u></b>  <b><u>B0353</u></b>  <b><u>B0356</u></b>  <b><u>B0359</u></b>  <b><u>B0405</u></b>  <b><u>B0411</u></b>  <b><u>B0455</u></b>  <b><u>B0468</u></b>  <b><u>B0511</u></b>  <b><u>B0531</u></b>  <b><u>B0557</u></b>  <b><u>B0558</u></b>  <b><u>B0559</u></b>  <b><u>B0698</u></b>  <b><u>B0701</u></b>  <b><u>B0710</u></b>  <b><u>B0792</u></b>  <b><u>B0792</u></b>  <b><u>B0824</u></b>  <b><u>B0951</u></b>  <b><u>B1040</u></b>  <b><u>B1108</u></b>  <b><u>B1155</u></b></p>		<p>SLO 117 states <i>"The feasibility of incorporating the East Coast Trail into any coastal protection works required between Corbawn Lane and the proposed DART station at Woodbrook should be investigated. . ."</i></p> <p>It is noted that the East Coast Cycle Trail and the depiction on the Draft Maps is at a strategic level only.</p> <p>The exact route choice has not been made and this would need to follow a route selection process on foot of a study of a range of issues including environmental, traffic, climate, coastal defence etc as state on page 108 of the Draft Plan that the <i>route "will be subject to a feasibility study, including an assessment of the route options."</i></p> <p>It would therefore be premature to recommend that the line of the route is moved in advance of this examination. Notwithstanding this SLO 117 states <i>"The feasibility of incorporating the East Coast Trail into any coastal protection works required between Corbawn Lane and the proposed DART station at Woodbrook should be investigated. . ."</i> Therefore, it is considered that this issue has been addressed as far as is feasible at present.</p> <p><b>Recommendation</b>  No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>approaches the beach. This rural lane needs to be protected.</p> <ul style="list-style-type: none"> <li>• Better to move the cycle route to Shankill village</li> <li>• SLO 117 would be a better solution than SLO18.</li> <li>• Regarding extending the East Coast Cycle Trail via Corbawn Drive Shankill. The proposed initial plan is to bring this trail through Corbawn Drive. The new Draft Plan proposes a feasibility study to assess an alternative route using the planned coastal defenses prefers the latter but in the event that option takes considerable time to develop, the former should be developed in the interim.</li> <li>• Welcomes the East Coast Trail through Corbawn and considers that this might reduce risk of speeding cars and will add to the amenity of the area.</li> </ul>			
<p>vii) A number of submissions were received on extending the East Coast Cycle Trail via Corbawn Drive Shankill, raising the following issues:</p> <ul style="list-style-type: none"> <li>• Safety and congestion issues relating to the current East Coast Cycle Trail route through Corbawn.</li> <li>• Would disrupt residents of Seafield and Corbawn</li> <li>• Should be fenced either side like the Waterford Greenway</li> <li>• Welcomes DLR's commitment for a feasibility study to re-route the East Coast Cycle trail by the coast at Corbawn and incorporate into coastal protection works</li> </ul>	<p><b><u>B0112</u></b>  <b><u>B0116</u></b>  <b><u>B0118</u></b>  <b><u>B0119</u></b>  <b><u>B0123</u></b>  <b><u>B0124</u></b>  <b><u>B0151</u></b>  <b><u>B0200</u></b>  <b><u>B0227</u></b>  <b><u>B0315</u></b>  <b><u>B0331</u></b>  <b><u>B0352</u></b>  <b><u>B0353</u></b>  <b><u>B0356</u></b></p>	10	<p>The Executive notes the issues raised and that some submissions are against the East Coast Trail routing through Corbawn while others welcome the proposed routing.</p> <p>SLO 117 states <i>"The feasibility of incorporating the East Coast Trail into any coastal protection works required between Corbawn Lane and the proposed DART station at Woodbrook should be investigated. . ."</i></p> <p>It is noted that the East Coast Cycle Trail and the depiction on the Draft Maps is at a strategic level only.</p> <p>The exact route choice has not been made and this would need to follow a route selection process on foot of a study of a range of issues including environmental, traffic, climate, coastal defence etc as state on page 108 of the Draft Plan that the <i>route "will be subject to a feasibility study, including an assessment of the route options."</i></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>between Corbawn Lane and the new Woodbrook Dart station.</p> <ul style="list-style-type: none"> <li>• A cycle way through Corbawn Drive would only be used by leisure cyclists and therefore wouldn’t achieve modal change.</li> <li>• Needs of the residents should be considered before cyclists, particularly settled neighbourhoods.</li> <li>• Limited road space on Corbawn Drive with cars parked on both sides of this narrow road, a growing number of young children living on the road and an increasing number of walkers heading to the local parks which cannot also accommodate a 3-4 m cycleway.</li> <li>• A balanced approach is needed in terms of the needs of residents and visitors.</li> <li>• A cycle route on the coast would limit the impact on local residents and protect the country lane aspect of Quinn’s Road as it approaches the beach. This rural lane needs to be protected.</li> <li>• Better to move the cycle route to Shankill village.</li> <li>• SLO 117 would be a better solution than SLO18.</li> <li>• Regarding extending the East Coast Cycle Trail via Corbawn Drive Shankill. The proposed initial plan is to bring this trail through Corbawn Drive. The new Draft Plan proposes a feasibility study to assess an alternative route using the planned coastal defences prefers the latter but in</li> </ul>	<p><b><u>B0359</u></b>  <b><u>B0405</u></b>  <b><u>B0411</u></b>  <b><u>B0455</u></b>  <b><u>B0468</u></b>  <b><u>B0511</u></b>  <b><u>B0531</u></b>  <b><u>B0557</u></b>  <b><u>B0558</u></b>  <b><u>B0559</u></b>  <b><u>B0698</u></b>  <b><u>B0701</u></b>  <b><u>B0710</u></b>  <b><u>B0792</u></b>  <b><u>B0792</u></b>  <b><u>B0824</u></b>  <b><u>B0951</u></b>  <b><u>B1040</u></b>  <b><u>B1108</u></b>  <b><u>B1155</u></b></p>		<p>It would therefore be premature to recommend that the line of the route is moved in advance of this examination. Notwithstanding this SLO 117 states “<i>The feasibility of incorporating the East Coast Trail into any coastal protection works required between Corbawn Lane and the proposed DART station at Woodbrook should be investigated. . .</i>” Therefore, it is considered that this issue has been addressed as far as is feasible at present.</p> <p><b>Recommendation</b>  No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>the event that option takes considerable time to develop, the former should be developed in the interim.</p> <ul style="list-style-type: none"> <li>• Welcomes the East Coast Trail through Corbawn and considers that this might reduce risk of speeding cars and will add to the amenity of the area.</li> </ul>			
<p>viii) Regarding the proposed cycleway via Bayview under the Railway Bridge to beach and beyond – paths need to be widened, consideration given to local residents, improvements to the beach etc. Local consultation is needed.</p>	<b><u>B1062</u></b>	10	<p>The Executive notes the issues raised.</p> <p>The East Coast Cycle Trail and the depiction on the Draft Maps is at a strategic level only, as set out above. The exact route choice has not been made and this would need to follow a route selection process on foot of a study of a range of issues including environmental, traffic, climate, coastal defence etc. It would therefore be premature to recommend that the line of the route is moved in advance of this examination.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ix) Submission suggests that the following should be included in Policy Objective T13: Coastal Cycling Infrastructure Objective:</p> <p><i>“Support the development, maintenance and enhancement of trails and routes in co-operation with Sports Council, NTA, NTO, NWMWAC, Heritage Council and other bodies to develop cycle touring routes including those linking with adjoining counties particularly in areas of high amenity”.</i></p>	<b><u>B0594</u></b>		<p>The Executive notes the issues raised in this comprehensive submission.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>x) Concerned with the impact of the National East Coast Cycle Trail on the Dalkey Railway Tunnel which is proposed to cross the tunnel multiple times.</p>	<b><u>B0989</u></b>	4	<p>The Executive notes the issue raised.</p> <p>The East Coast Cycle Trail and the depiction on the Draft Maps is at a strategic level only. The exact route choice has not been made and this would need to follow a route selection process on foot of a study of a range of issues including environmental, traffic, climate, coastal defence etc.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.5.4: Demand Management and Travel Planning</b>			
<p>xi) DLR should Implement a plan to reduce car parking and to reallocate this space to active travel, with annual targets.</p>	<p><b><u>B0319</u></b> <b><u>B1047</u></b></p>		<p>The Executive notes the sentiments raised regarding this issue.</p> <p><b>This is not considered to be a County Development Plan issue but an action of the DLR CCAP.</b> Action T2 in the CCAP is to “Reduce car parking to provide for sustainable travel alternatives”. Policy Objective CA4: Dún Laoghaire-Rathdown County Council Climate Change Action Plan is a policy to implement the Action Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xii) Travel plans, Traffic Impact Assessment and any mobility management must make reference to the need to measure, monitor and reduce carbon emissions.</p>	<p><b><u>B1088</u></b></p>		<p>The Executive notes the issue raised.</p> <p><b>This is not considered to be a County Development Plan issue.</b> Travel Plans and Transport Impact Assessment are carried out in accordance with National and International Guidelines. The focus is on reducing traffic impact which in turn reduces greenhouse gas emissions.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.5.4.1: Policy Objective T17: Car Sharing Schemes</b>			
<p>i) Requests that the provision of car sharing options such as “GO” cars be available in close proximity to all new developments.</p> <p>Support idea of objective but Covid-19 may cause unease.</p>	<p><b><u>B1079</u></b> <b><u>B0905</u></b> <b><u>B0942</u></b></p>		<p>The Executive notes the contents of this submission.</p> <p>Policy Objective T17: Car Sharing Schemes sets out the general policy for this topic and the detail is assessed through the Development Management process.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Council employees could lead by example if the council investigated opportunities for car sharing facilities.</p>	<p><b><u>B0905</u></b></p>		<p>The Executive notes the issue raised.</p> <p><b>This is not considered to be a County Development Plan issue.</b> The Council has a fleet of shared Electric Vehicles, pedal and electric bicycles.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.5.4.2: Policy Objective T19: Control of On-Street Parking</b>			
<p>iii) Request more multi-storey preferably underground car parks, especially in areas such as Sandycove and Seapoint are required.</p> <p>No parking should be allowed in Dundrum village and it should be strictly controlled in neighbouring estates.</p>	<b>B0587</b>		<p>The issue raised is noted by the Executive.</p> <p><b>This is not considered to be a County Development Plan issue, parking control is an operational issue.</b> It is not the policy of the Council to be a provider of multi-storey/underground car parks in high density urban areas.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.5.5: Roads and Street Network</b>			
<b>3.5.6: Policy Objective T22: Roads and Streets</b>			
<p>i) The existing section of the Clay Farm Loop Road adjoining Castle Court should be included as a "6 Year Road extension/traffic management..." objective on Map 9.</p>	<b>B0002</b>	9	<p>The Executive notes the issue raised.</p> <p>The overall Clay Farm Loop road is included in the 6 year road objective table 5.3. If any changes are required to the existing loop road it would be considered to be a "smaller-scale scheme" and is <b>not, therefore, considered a County Development Plan issue</b>. In this regard Section 5.7.1 states:</p> <p>"Note 1: Smaller-scale schemes, such as minor junction improvements, traffic management improvements and the provision of footpaths, are not shown on the County Development Plan Maps, nor are they included in the Written Statement."</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) The bridge on Hillcrest Road needs to be increased in width and traffic management should also be improved.</p>	<b>B0002</b>	5 6	<p>The Executive notes the issue raised.</p> <p>Hillcrest Road is included in Table 5.3 as a 6 year Road Objective/Traffic Management/Active Travel Upgrade.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			No change to Draft Plan.
iii) The delivery of the realignment of the Shanganagh Road from Broomfield Court to Shanganagh Bridge should be prioritised due to the risk to pedestrians and cyclists.	<b><u>B0004</u></b>	10	<p>The Executive notes the issue raised.</p> <p>The Shanganagh Road is listed in Table 5.3 6 Year Road Objectives/Traffic management/Active Travel Upgrades. Hence it is the intention of the Council to further the objectives of this during the lifetime of the Plan.</p> <p>The Capital Programme 2020-2022 states with regard to the Shanganagh Road states that 135 metres of footpath improvements was completed in 2018 and there is funding available for a Phase 2 for a further 315m of footpath is listed in the DLR Programme of Capital Projects 2021-2023 subject to detailed design.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
iv) A direct road link to the M11 from Shankill village is needed to address traffic congestion in Shankill on foot of development in the vicinity of Shanganagh Castle	<b><u>B0010</u></b>	14	<p>The Executive notes the issue raised.</p> <p>The Woodbrook Shanganagh Local Area Plan 2017-2023 sets out the sustainable transport infrastructure required for the development of the lands in question. This does not include a new road link to the M11. The focus instead is on the establishment of sustainable travel patterns. In this regard the Council is working with the NTA on a range of projects including the delivery of the new DART station at Woodbrook, Bus Connects which includes bus infrastructure along with improved cycling and pedestrian facilities.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
v) Submissions raise issues regarding Kiltiernan: <ul style="list-style-type: none"> <li>• The Plan should focus more on the delivery of access infrastructure.</li> <li>• Local opposition to development is noted due to increased congestion in Sandyford/Kiltiernan and inadequacies in public transport and active travel networks. Projects such as the Blackglen Road upgrade have been delayed but not explained.</li> </ul>	<b><u>B0031</u></b> <b><u>B0737</u></b> <b><u>B0756</u></b> <b><u>B0811</u></b> <b><u>B0985</u></b>	9	<p>The Executive notes the issues raised.</p> <p>The County Development Plan sets out a framework for development in the County in accordance with the legislation. Appendix 1 contains information on project delivery of larger projects, some of which are delivered by others, whilst delivery of smaller projects is more an operational issue for the relevant Council Department and would in many instances be subject to funding and procurement. In terms of major Council lead projects at Blackglen Road and Kiltiernan the following explains the time lines:</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> <li>Supports the Bus Priority Route on Glenamuck Road and the 6 Year Road Objective for the delivery of the Kiltiernan / Glenamuck Distributor Road (GDR). It is important that the delivery of the Kiltiernan / Glenamuck Distributor Road, particularly the link between the R117 Enniskerry Road to the Glenamuck Road / Golf Lane is rapid.</li> <li>Glenamuck Road should be widened and bike and pedestrian infrastructure installed.</li> <li>Local infrastructure must be planned and implemented before additional construction takes place (in Kiltiernan LAP area).</li> </ul>			<p>A Part 8 planning scheme was approved for the Blackglen Road / Harold's Grange Road Improvement Scheme (Sandyford / Ballinteer) in November 2007. Due to the economic downturn, the scheme was put on hold. A revised Part 8 was approved by the Council in June 2016. CPO (Compulsory Purchase Order) was published on 19th April 2018 and confirmed on 13th February 2019. A detailed design is complete and the tender process is underway. The 3km scheme will be constructed on a phased basis as funding becomes available. It is estimated that construction of phase 1 will begin in late 2021 and take c.15-18 months to construct.</p> <p>In term of the Glenamuck District Roads Scheme the Environmental Impact Assessment Report (EIAR) submitted to An Bórd Pleanála for approval on 15th March 2019. Compulsory Purchase Order (CPO) was published on 2nd April 2019. The CPO was approved by An Bord Pleanála on the 18th of December 2019. Notice of the confirmation of the CPO was advertised on the 7th of February 2020. The tendering process is due to be underway by Autumn 2021 and it is anticipated that construction will commence in 2022.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
vi) Roads between Belarmine/Stepaside M50, Kilgobbin and city centre should be improved.	<b><u>B0061</u></b>	9	<p>The Executive notes the submission.</p> <p>A number of roads in the vicinity are listed in Table 5.3 (page 111) for 6 Year Road Objectives/Traffic Management/Active Travel upgrades. These include Sandyford Road and Hillcrest Road, and Kilgobbin Road (from Sandyford Hall to Ballyogan Road).</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
vii) Falls Road should be included in Table 5.3 and shown on Map no 10 as there is presently no footpath and lighting is inadequate.	<b><u>B0085</u></b> <b><u>B0089</u></b> <b><u>B0101</u></b> <b><u>B0361</u></b> <b><u>B0576</u></b> <b><u>B1227</u></b> <b><u>B1228</u></b> <b><u>B1229</u></b> <b><u>B1230</u></b>		<p>The Executive notes the issue raised.</p> <p><b>These works would fall under "smaller-scale scheme" and is not, therefore, considered a County Development Plan issue.</b> In this regard Section 5.7.1 states:</p> <p><i>"Note 1: Smaller-scale schemes, such as minor junction improvements, traffic management improvements and the provision of footpaths, are not shown on the County Development Plan Maps, nor are they included in the Written Statement."</i></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
	<u><b>B1231</b></u> <u><b>B1232</b></u>		This matter is more appropriately dealt with as part of the Rathmichael Local Area Plan.  <b>Recommendation</b> No change to Draft Plan.
viii) Road Drainage issues are raised with a preference for nature based solutions particularly on National Routes so as to reduce pollutants from the road entering water courses and negatively impacting on fisheries	<u><b>B0131</b></u>		The Executive notes the issues raised.  This matter is covered in the plan under Policy Objective 10.2.2.6 Sustainable Drainage systems and is assessed through the development management process by the Council in consultation with the Prescribed bodies. With regard to national roads this falls within the remit of the TII.  <b>Recommendation</b> No change to Draft Plan.
ix) Concerned with widening of Cherrywood Road – would result in loss of garden, trees, parking, heritage impacts on the Cherrywood Viaduct, speeding and increased noise.	<u><b>B0253</b></u> <u><b>B0446</b></u>	10	The Executive notes the issue raised.  Cherrywood Road is listed in Table 5.3 (page 111) for 6 Year Road Objectives/Traffic Management/Active Travel upgrades. Consultation will be carried out in due course with stakeholders and all relevant considerations including traffic and heritage will be taken into consideration.  <b>Recommendation</b> No change to Draft Plan.
x) In terms of the Stepside area: <ul style="list-style-type: none"> <li>• Traffic calming and pedestrian lights at junctions are required through Stepside village and Enniskerry Road along with footpaths and cycle tracks.</li> <li>• Traffic controls needed to reduce speed in Stepside. The right filter lane to Kilgobbin Road in Stepside should be removed and the road space used for public space.</li> </ul>	<u><b>B0796</b></u> <u><b>B1099</b></u>	9	The Executive notes the issue raised.  The Enniskerry Road from Stepside to Glenamuck Distributor Road is listed in Table 5.3 6 Year Road Objectives/Traffic management/Active Travel Upgrades. Hence it is the intention of the Council to further the objectives of this during the lifetime of the Plan.  <b>Recommendation</b> No change to Draft Plan.
xi) Submission requests that a collaborative approach be taken to sustainable movement and	<u><b>B0997</b></u>	5	The Executive notes the issue raised.

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>transportation up to and across the DLRCC and SDCC County boundary to facilitate development of the 'Edmonstown Lands' located in SDCC.</p>			<p>It is the policy of the Council to improve pedestrian and cycle infrastructure where feasible in accordance with the policies set out in Section 5.5 of the draft and to work with adjoining Local Authorities and the NTA in this regard. The Draft Plan includes Harold's Grange/ College Road in Table 5.3; however the full length of College Road is not included on Map 1. The Executive notes that there is a very narrow corridor on the section of College Road north of the M50 which would make it very difficult to provide a cycle route at the location in question. Grange Golf Club and Marlay Park would be the affected properties if land acquisition was required. A cycle route on College Road is not part of the NTA's current cycle network plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xii) Requests the County Development Plan objective in relation to Quinn's Road (p. 112 of the Draft County Development Plan) be amended as follows:</p> <p><i>"It is also a long-term objective of the Council to retain Quinn's Road Shankill, between the south of the entrance to the Shankill Tennis and Bowling Club and the sea, as an attractive 'country' road".</i></p> <p>Country lane of Quinns Road should be retained as a rural amenity/natural walkway for the people of Shankill.</p>	<p><b><u>B0511</u></b> <b><u>B0710</u></b> <b><u>B0932</u></b></p>	<p>10</p>	<p>The issue raised in these submissions are noted.</p> <p>The current policy for Quinns Road states on page 112:</p> <p><i>'It is also a long-term objective of the Council to retain Quinn's Road Shankill, between the railway bridge and the entrance to the Shankill Tennis and Bowling Club and the sea, as an attractive 'country' road.'</i></p> <p>Quinn's Road east of the DART line is a substandard cul-de-saced country lane providing access solely to a sports club and some six or seven individual residential properties. The road is of substandard width, has no footpaths, is unlit and is bounded along its length by parallel lines of mature deciduous trees which add significantly to the overall semi-rural character and ambience of the area and the laneway. The Quinn's Road laneway is reasonably heavily trafficked by pedestrians accessing both the coast and the 'rear' entranceway into Shanganagh Park. For the reasons set out above it is not considered appropriate to amend the wording with regard to Quinns Road</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xiii) Concerns raised regarding road design:</p> <ul style="list-style-type: none"> <li>• Frascati Road from shopping centre to bottom of Temple Hill- the Plan should reconsider</li> </ul>	<p><b><u>B0884</u></b> <b><u>B1132</u></b></p>	<p>2 7</p>	<p>The Executive notes the issue raised.</p> <p><b>These are design issues which are not considered to be County Development Plan issues.</b></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>where inappropriate road design policies lead to less safety for all road users.</p> <ul style="list-style-type: none"> <li>Existing road design issues in relation to DLR roundabouts, particularly noticeable in Glenageary to Dalkey ones.</li> <li>Request that the use of roundabouts in preference to traffic lights is incorporated into the Plan for future developments and where they can be accommodated into existing junctions.</li> </ul>			<p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xiv) The proposed Southbound Ramp to the M-50 from Leopardstown Road and the ESB Link Road from Junction 14 M-50 to Arena Road should be built urgently.</p>	<b><u>B1079</u></b>	6	<p>The Executive notes the issue raised.</p> <p>The M50 junction diverge and ESB Link Road and Link to Arena Road are listed in table 5.3 6-year Road Objectives/Traffic management/Active Travel Upgrades in the Draft Plan. It is intended to progress the ESB link road in 2022 with the ESB. This will benefit pedestrians, cycle and bus users as well as motorised vehicles.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xv) Requests that the Council reviews the Glenamuck District Roads Scheme (GDRS) in the interest of Climate Action, impact on biodiversity in terms of hedgerow loss.</p>	<b><u>B1196</u></b>	9	<p>The Executive notes the issue raised.</p> <p>The Glenamuck District Roads Scheme (GDRS) which is required to allow sustainable plan led build out of the Kiltiernan Glenamuck area for new communities was approved by An Bord Pleanála in late 2019. The documentation submitted with the proposed scheme included an Environmental Impact Statement which considered climate and biodiversity impacts and provided mitigation measures. The detailed design is in progress at present which includes a range of design measures to mitigate climate and biodiversity impacts. This project will go to tender later in 2021.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xvi) Notes that a number of projects have been prioritised and trust these can be delivered asap.</p>	<b><u>B0942</u></b>		<p>The Executive notes the issue raised. Individual capital projects are progressed as planning, legal and statutory requirements are met, and contracts awarded when the full funding</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>required to complete the project is available. Any, or a combination of, these factors will impact the pace of progression of individual projects.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.5.6.1: Dublin Eastern Bypass (DEBP)</b>			
<p>xvii) In terms of DEBP and SLO 4:</p> <ul style="list-style-type: none"> <li>• Recommends the amendment of SLO 4 to take account of the Dublin Eastern Bypass Corridor Protection Study Booterstown to Sandyford.</li> <li>• The Eastern Bypass is contrary to the commitments and vision of Chapters 3 and 5 of the Plan. Requests that the Eastern Bypass SLO 4 be removed from maps 1,2,5,6 of the Plan</li> <li>• Request that SLO 4 is updated to include pedestrian / cyclist permeability to adjoining areas.</li> <li>• The DEBP reservation should be omitted from the Plan. The presence is preventing development, it will not be built. The removal would increase the supply of zoned residential lands which could help meet the demand for housing. The reservation should be shown in tunnel at Drummartin Lodge</li> <li>• The Dublin Eastern Bypass Corridor Protection Study Booterstown to Sandyford should be referenced in terms of development in the vicinity of the DEBP Corridor.</li> </ul>	<p><b><u>B0192</u></b> <b><u>B0391</u></b> <b><u>B0529</u></b> <b><u>B1178</u></b></p>	<p>1 2 5 6</p>	<p>The Executive notes the issues raised which are both in favour and opposed to the Eastern bypass.</p> <p>The Council has recommended in the submission to the review of the NTA’s Transport Strategy for the GDA “a review of the need to retain the Dublin Eastern Bypass Corridor, which is a valuable bank of land within the built-up area of the County. If it must be retained, then at minimum the inclusion of text allowing for the provision of sustainable uses pending a decision from Transport Infrastructure Ireland/Central Government in relation to the future status of the Bypass is recommended to be included in the Strategy.”</p> <p>The County Development Plan is, however, statutorily obliged to be consistent with the EMRA RSES and the NTAs Transport Strategy for the GDA. The Dublin Eastern Bypass (DEBP) is included in both of these documents as a long term route corridor for protection “to facilitate the possible future use of the corridor for transport provision”. It is noted that the requirement to protect the DEBP corridor is reiterated in the TII’s submission to the Draft Plan where they state “The Government has not yet made a decision whether or not to further advance the project. It is therefore welcome that the Draft Development Plan continues to afford the protection of the scheme.”</p> <p>The DEBP is listed in Table 5.4 Draft Plan as a Long term Road Objective and shown on the Draft Plan maps as a Strategic road reservation on land use maps 1,2,5 and 6 subject to SLO 4.</p> <p>SLO 4 states: “To promote potential additional future uses of the Dublin Eastern Bypass reservation corridor, including a greenway/cycleway, a pedestrian walkway, biodiversity projects, recreational opportunities - inclusive of playing pitches - public transport provision and other suitable temporary uses, pending a decision from Transport Infrastructure Ireland/Central Government in relation to the future status of the Bypass. Any potential additional future short-term uses of</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><i>the reservation corridor will be subject to a joint feasibility study to be undertaken by TII and the NTA.”</i></p> <p>The “<i>Dublin Eastern Bypass Corridor Protection Study Booterstown to Sandyford</i>” (NRA, January 2011) sets out the corridor to be protected and the parameters for the consideration of planning applications. The Dublin Eastern Bypass is shown as a Strategic Road Reservation on the Draft Plan maps consistent with the Route Corridor set out in the NRA Study.</p> <p>It is considered appropriate to update SLO 4 to refer to the Dublin Eastern Bypass Corridor Protection Study Booterstown to Sandyford as the Council is required to implement this study as the DEBP is listed in the EMRA RSES and NTA’s Transport Strategy for the GDA and to reiterate that the uses are intended as short term uses.</p> <p>With regard to the request to update it to include pedestrian/cycle permeability to adjoining areas this is not considered necessary as it would already be covered in the wording “<i>and other suitable temporary uses</i>”. The connection of permeability links would need to be acceptable to the TII and NTA and not prejudice the delivery of the DEBP in the event that the delivery of same is decided on in due course.</p> <p>In the event that the DEBP corridor is no longer required a study on the best use of the corridor should be carried out, consideration should be given to a range of uses including sustainable transport uses.</p> <p><b>Recommendation</b> Update SLO 4 from:</p> <p><i>“To promote potential additional future uses of the Dublin Eastern Bypass reservation corridor, including a greenway/cycleway, a pedestrian walkway, biodiversity projects, recreational opportunities - inclusive of playing pitches - public transport provision and other suitable temporary uses, pending a decision from Transport Infrastructure Ireland/Central Government in relation to the future status of the Bypass. Any potential additional future short-term uses of the reservation corridor will be subject to a joint feasibility study to be undertaken by TII and the NTA.”</i></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>To</p> <p><i><u>“To implement the requirements of the Dublin Eastern Bypass Corridor Protection Study Booterstown to Sandyford, 2011 and any subsequent updates to same and to promote potential additional future temporary uses of the Dublin Eastern Bypass reservation corridor, including a greenway/cycleway, a pedestrian walkway, biodiversity projects, recreational opportunities - inclusive of playing pitches - public transport provision and other suitable temporary uses, pending a decision from Transport Infrastructure Ireland/Central Government in relation to the future status of the Bypass. Any potential additional future short-term uses of the reservation corridor will be subject to a joint feasibility study to be undertaken by TII and the NTA. In the event that the corridor is no longer needed for the DEBP a study should be carried out to determine the best use of the corridor prior to any development being permitted. This should include the consideration of sustainable transport, biodiversity and recreation projects.”</u></i></p> <p>Insert a new Section:</p> <p><i>12.4.15 Dublin Eastern Bypass</i></p> <p><i><u>Planning applications in the vicinity of the Dublin Eastern Bypass shown on the development plan maps 1,2,5 and 6 as a Strategic road reservation and subject to SLO 4 shall comply with the requirements of the Dublin Eastern Bypass Corridor Protection Study Booterstown to Sandyford, 2011 and any subsequent updates. All such applications shall be accompanied by a report setting out how the requirements of the Protections Study are meet. In the event that the corridor is no longer needed for the DEBP a study should be carried out to determine the best use of the corridor prior to any development being permitted. This should include the consideration of sustainable transport, biodiversity and recreation projects.”</u></i></p>
<p>xviii) The alignment of the DEBP reservation corridor and guidance included within the Dublin Eastern Bypass Corridor Protection Study Booterstown to Sandyford 2011 and Spatial Planning and National Roads Guidelines for Planning Authorities 2012 are hindering development which is necessary to enhance the facilities of the hotel (a</p>	<p><b>B0547</b></p>	<p>2</p>	<p>The Executive notes the issue raised but does not agree.</p> <p>The requirements to retain the bypass corridor are set out above. The Dublin Eastern Bypass Corridor Protection Study January (NRA, 2011) sets out the corridor to be protected and the parameters for the consideration of planning applications. Page 2 of the document states “development should generally not be permitted within this corridor where it would jeopardise the deliverability of the Eastern Bypass motorway.” The Dublin Eastern Bypass is</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
protected structure) which have no potential for conflict with any future road scheme or any other future transport based alternative within this corridor. Preventing renewal or refurbishment of the hotel will compromise a Protected Structure (St Helen's). Development should be permitted over the existing basement which is within the corridor as this cannot be used for the route/alignment. Request an SLO to address this.			<p>shown as a Strategic Road Reservation on the Draft Plan maps. The reservation show on the Draft Plan is consistent with the Route Corridor shown set out in the Dublin Eastern Bypass Corridor Protection Study (NRA, 2011).</p> <p>For the reasons set out above it is not considered appropriate to recommend an SLO to allow the development over the existing basement as this would encroach on the protection corridor. It is not within the remit of the Council to change the protection corridor.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
xix) The Heidelberg Cul de Sac/boundaries should be reinstatement; Knockrabo should be connected to Ardilea Crescent by road and by re-connecting the two road networks which have been created within these two developments, the Heidelberg Cul de Sac/ boundary can be reinstated.	<b>B0274</b>	1 2	<p>The Executive notes the issue raised.</p> <p>The submission is referring to two private developments in the Clonskeagh area (Ardilea Crescent and Knockrabo) which have been constructed and seek to retrospectively connect them and restore the pre-development cul de sac/boundary to Heidelberg.</p> <p>These two developments are separated by the DEBP Corridor. The requirements to retain the bypass corridor free from development are set out above in detail. To achieve what the submission is suggesting would require building a road through the Corridor and this is not feasible at present having regard Dublin Eastern Bypass Corridor Protection Study (NRA, 2011).</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.5.6.2: Policy Objective T23: Motorway and National Routes</b>			
<p>i) In terms of T23:</p> <ul style="list-style-type: none"> <li>• Welcomes Policy Objective T23.</li> <li>• Protection of national road junctions is required by national policy (Spatial Planning and National Roads Guidelines for Planning Authorities, 2012).</li> <li>• In terms of the N11/M11 Junction 4 to 14 improvement scheme there is a need for a</li> </ul>	<b>B0192</b>	14	<p>The Executive welcomes the TII's support for Policy Objective T23: Motorway and National Routes agrees with the issues raised.</p> <p>Policy Objective T23: Motorway and National Routes sets out the Council's policy with regard to motorways and national routes</p> <p>The supporting text to Policy Objective T23 refers to the 'Spatial Planning and National Roads Guidelines for Planning Authorities', 2012 refers to "<i>the protection of all National routes...</i>". The TII are requesting that the supporting text is altered to include specific mention of the</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>stated policy to protect the potential route corridors and thereafter the preferred route corridor to prohibit development which could prejudice the future delivery. A suggested wording is provided for section 5.7.2</p>			<p>protection of 'associated junctions' of national roads in accordance with TII's Policy and the Department of Environment, Community and Local Government's 'Spatial Planning and National Roads Guidelines for Planning Authorities' (2012).</p> <p>The TII are also requesting a stated policy to protect 'potential route corridors within the N11/ M11 Scheme and thereafter the preferred route corridor selected and prohibit development that could prejudice their future delivery.' It is noted that this scheme is listed in Table 5.3: 6 Year Road Objective/Traffic Management/Active Travel Upgrades.</p> <p>It is considered that the changes requested are acceptable.</p> <p><b>Recommendation</b>  Insert the following text after the second paragraph on the left-hand column of p.113:</p> <p><i>In accordance with Section 2.9 of the 'Spatial Planning and National Road Guidelines for Planning Authorities' the Council will protect the potential route corridors within the N11/ M11 Scheme and thereafter the preferred route corridor selected and prohibit development that could prejudice their future delivery.</i></p> <p>Make the following change to the third paragraph on the left-hand column of p. 113:</p> <p><i>The Council will facilitate the protection of all National routes <del>and associated junctions from frontage access and to minimise the number of junctions</del> in accordance with TII's Policy and the Department of Environment, Community and Local Government's 'Spatial Planning and National Roads Guidelines for Planning Authorities' (2012).</i></p>
<p>ii) Concerned that N11 and M50 will be stretched to breaking point as a result of ongoing development.</p>	<p><b>B0079</b></p>		<p>The Executive does not agree with this this submission.</p> <p>The N11 and M50 are protected in the Draft Plan. Policy Objective T23: Motorway and National Routes "provides for the protection of the National routes in accordance protect and maintain for the safe and efficient movement of people and goods both within and through Dún Laoghaire-Rathdown". While Policy Objective T25: Traffic and Transport Assessments and Road Safety Audit require Traffic and Transport Assessments for major developments in accordance with the TII's "Traffic and Transport Assessment Guidelines' (2014) - to assess the traffic impacts on the surrounding road network and provide measures to mitigate any adverse</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p><i>impacts - all in accordance with best practice guidelines.</i>" These are assessed through the development management process.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Upgrade the Cherrywood to Kiltiernan Link Road and Priorsland Bridge to a six-year road objective.</p>	<p><b>B1234</b></p>	<p>9</p>	<p>The Executive notes the issue raised.</p> <p>The Cherrywood to Kiltiernan Link Road and Priorsland over-bridge is part of the Cherrywood SDZ (necessary roads infrastructure as detailed in Cherrywood SDZ Planning Scheme) and as such is listed in both the 6 year and Long Term Road Objectives as set out in Table 5.3 and 5.4 of the Draft. <b>The Cherrywood Planning Scheme is made and amended under a separate legislative process to the County Development Plan.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Submission expresses concern in relation to long term traffic management/active travel upgrades upgrade to Ballycorus Road.</p>	<p><b>B0743</b></p>	<p>9 10</p>	<p>The Executive notes the issue raised.</p> <p>The Ballycorus Road is listed in Table 5.4 Long Term Road Objective/Traffic Management/Active Travel Upgrade of the Plan and no detailed plans have been prepared with respect to the Road. If significant works are proposed in the future, such as road widening, then the design would be informed by environmental and heritage assessments.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p><b>3.5.6.3: Policy Objective T25: Traffic and Transport Assessment and Road Safety Audits</b></p>			
<p>v) Submission request that capacity at key road junctions on approach to the Dundrum Town Centre is available to prevent congestion and to ensure that Dundrum Town Centre maintains its status as a successful regional retail development.</p>	<p><b>B1072</b></p>	<p>1 5</p>	<p>The Executive notes the issue raised.</p> <p>Policy Objective T25: Traffic and Transport Assessments and Road Safety Audit requires Traffic and Transport Assessments for major developments in accordance with the TII's "<i>Traffic and Transport Assessment Guidelines' (2014) - to assess the traffic impacts on the surrounding road network and provide measures to mitigate any adverse impacts - all in accordance with best practice guidelines.</i>" This is assessed on a case by case basis through the development management process.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>Furthermore, the Dundrum ABTA which is currently in preparation, will consider transport and traffic issues related issues in the context of the Dundrum Local Area Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.5.6.4: Policy Objective T27: Road Safety</b>			
<p>vi) In terms of traffic the following issues are raised:</p> <ul style="list-style-type: none"> <li>• Double yellow lines need to be enforced</li> <li>• Speeding offences and their practices need to be reviewed.</li> </ul>	<p><b><u>B0549</u></b> <b><u>B0121</u></b></p>		<p>The Executive notes the issues raised.</p> <p><b>These are considered to be operational Traffic Issues rather than County Development Plan issues.</b> Speed limits are under consideration through the Speed Limit Review of the County.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>vii) School Transport Scheme needs to be actively expanded to allow safe transport for pupils and reduce traffic on roads.</p> <p>Ensure safe access by car, bike and foot for all school children within DLR.</p>	<p><b><u>B1020</u></b></p>		<p>The Executive notes the issue raised.</p> <p>Bus Éireann operates the school transport schemes on behalf of the Department of Education. It is therefore not within the remit of the Council and <b>is not a County Development Plan issue.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>viii) Submission notes issues with vehicular access at Monaloe Drive / Clonkeen area.</p>	<p><b><u>B0152</u></b></p>	<p>7</p>	<p>The Executive notes the issue raised.</p> <p><b>This is not considered to be a County Development Plan issue.</b> This is an operational Traffic issue which is not within the scope of the Draft Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ix) Submission raises issues around safety of walking on main roads to Ticknock forest.</p>	<p><b><u>B0030</u></b></p>	<p>5</p>	<p>The Executive notes the issue raised.</p> <p><b>This is not considered to be a County Development Plan issue.</b> This is an operational Traffic issue which is not within the scope of the Draft Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<b>3.5.6.5: Policy Objective T28: Traffic Management</b>			
i) The traffic light system at the junction of the Ballyogan Road, Murphystown Way, and Kilgobbin Road and traffic controls are needed to reduce speed in Stepside.	<b><u>B0002</u></b>	6	The Executive notes the issue raised.  <b>This is not considered to be a County Development Plan issue.</b> This is an operational Traffic issue which is not within the scope of the Draft Plan.  <b>Recommendation</b> No change to Draft Plan.
ii) In terms of Stepside/Ballyogan area: <ul style="list-style-type: none"> <li>• The design of the roundabout on the junction of Kilgobbin Road and Sandyford Hall should be reviewed and additional barriers should be installed along Sandyford Hall Avenue in the interest of pedestrian safety (Map 6).</li> <li>• The right filter lane to Kilgobbin Road should be removed and used for public space.</li> </ul>	<b><u>B0002</u></b>	6	The Executive notes the issue raised.  The roundabout and junction in question is considered a “ <i>smaller-scale scheme</i> ” and is <b>not, therefore, considered a County Development Plan issue.</b> In this regard Section 5.7.1 states:  <i>“Note 1: Smaller-scale schemes, such as minor junction improvements, traffic management improvements and the provision of footpaths, are not shown on the County Development Plan Maps, nor are they included in the Written Statement.”</i>  <b>Recommendation</b> No change to Draft Plan.
iii) Request traffic calming and traffic management measures due to safety concerns raised along various including the following: <ul style="list-style-type: none"> <li>• Killiney Hill Road and Vico Roads</li> <li>• Booterstown/Cross Ave.</li> <li>• Avondale Road (electronic notification signs are requested)</li> <li>• Barton Road East/ Churchtown Road/ Breamore Road/ Nutgrove Avenue</li> <li>• Blackglen Road area.</li> <li>• Monkstown Road and Seapoint Avenue</li> </ul>	<b><u>B0121</u></b> <b><u>B0360</u></b> <b><u>B0526</u></b> <b><u>B0885</u></b> <b><u>B0937</u></b> <b><u>B1024</u></b> <b><u>B1177</u></b>	4	The Executive notes the issues raised.  Traffic calming and traffic management measures have been requested on a number of routes and locations; some of these are on narrow roads which become busy as they are popular for recreational activity and with tourists. These are mainly operational Traffic Management and Traffic Safety issues <b>which are not County Development Plan issues.</b> Local smaller scale traffic management measures are carried out on a case by case basis.  Some traffic calming measures could constitute a “ <i>smaller-scale scheme</i> ” and are <b>not, therefore, considered a County Development Plan issue.</b> In this regard Section 5.7.1 states:  <i>“Note 1: Smaller-scale schemes, such as minor junction improvements, traffic management improvements and the provision of footpaths, are not shown on the County Development Plan Maps, nor are they included in the Written Statement.”</i>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>In addition, some of the roads referred to in the submission are part of the NTA's GDA cycle network. The roll out of the GDA cycle network is ongoing and it should be noted that the Council is engaging with the NTA on the updating of this as part of the preparation of the forthcoming new Transport Strategy for the GDA.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Request traffic calming and traffic management measures on:</p> <ul style="list-style-type: none"> <li>• The Blackglen Road area.</li> <li>• Ferndale Road</li> </ul>	<p><b><u>B0814</u></b> <b><u>B1070</u></b></p>	<p>5 10 14</p>	<p>The Executive notes the issue raised.</p> <p>The Blackglen Road and Ferndale Road are listed in Table 5.3 6 Year Road Objectives/Traffic Management/Active Travel and hence it is Policy Objective to improve these roads during the lifetime of the Plan.</p> <p>Furthermore, a detailed design is complete, and the tender process is underway for a 3km scheme on the Blackglen Road which will be constructed on a phased basis as funding becomes available. It is estimated that construction of phase 1 will begin in late 2021 and take c.15-18 months to construct.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>v) Traffic Management needs to be looked at in tandem with large-scale housing developments and for overall areas</p>	<p><b><u>B0586</u></b> <b><u>B0942</u></b></p>		<p>The Executive notes the issue raised.</p> <p><b>This is not considered to be a County Development Plan issue.</b> This is an operational Traffic issue which is not within the scope of the Draft Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>vi) While many initiatives to promote cycle lanes and remove cars are to be welcomed, efficient movement of traffic on arterial routes across the County and into towns is vitally important. Measures to slow or hinder traffic on core roads will encourage 'rat running'.</p>	<p><b><u>B0905</u></b></p>		<p>The Executive notes the issue raised.</p> <p><b>This is not considered to be a County Development Plan issue.</b> This is an operational Traffic issue which is not within the scope of the Draft Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
vii) Submission request a pilot programme to give various residential estates in the Dundrum area back to the pedestrians. Possible trial suggested in the Dundrum area. A 30kph zone should be considered for all of Dundrum.	<b>B0437</b> <b>B0624</b>	1 5	<p>The Executive notes the issues raised.</p> <p>These issues are traffic management issues and hence <b>are not County Development Plan issues</b>. The operational aspects are dealt with on a case-by-case basis in accordance with the Neighbourhood Traffic Management Guidelines procedure. The Speed Limit Review of the County is currently being undertaken which will inform new speed limit proposals.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.5.6.6: Policy Objective T30: Accessibility</b>			
i) In terms of accessibility: <ul style="list-style-type: none"> <li>Local Authority should support a 'whole journey approach' to make public transport fully accessible to people with disabilities which includes supporting a universal design approach to the built environment in accordance with the Government's 'National Disability Inclusion Strategy,' 2017- 2021.</li> <li>Concerned with the lack of investment in public transport and making it accessible.</li> </ul>	<b>B0016</b> <b>B1063</b>		<p>The Executive agrees with the issue raised.</p> <p>The Draft Plan supports suitable access and permeability for all including persons with disabilities including improvements to walking and cycling networks, transport, streets and public spaces in the following Policy Objectives:</p> <ul style="list-style-type: none"> <li>Policy Objective T10: Walking and Cycling</li> <li>Policy Objective T30: Accessibility.</li> </ul> <p>The 'whole journey approach' to making public transport fully accessible to all and the universal design approach is an important component of the '<u>National Disability Inclusion Strategy,' 2017- 2021.</u></p> <p>It is considered appropriate to amend Section 5.7.9 with regard to the policy matter raised with regard to the 'whole journey approach'.</p> <p><b>Recommendation</b> Amend Section 5.7.9 (p 114) by adding a paragraph which states: <i>"The Local Authority support a 'whole journey approach' to make public transport fully accessible to people with disabilities which includes supporting a universal design approach to the built environment in accordance the Government's 'National Disability Inclusion Strategy,' 2017- 2021. In this regard improving the accessibility to parks and other permeability routes is an important action which the Council is undertaking to improve access for all throughout the County."</i></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
ii) Accessible design issues are raised: <ul style="list-style-type: none"> <li>• Dished footpaths at all junctions, removal of metal barriers, and priority traffic lights given to pedestrians and cyclists of all ages and abilities.</li> <li>• With regard to people with disabilities there are design issues that relate to the use of shared surfaces, design of crossings, interactions with cyclists, bus islands, design of cycle lanes, design of bus and tram stops and shelters.</li> </ul>	<u>B0406</u> <u>B0863</u>		<p>The Executive notes and agrees with the sentiments of the issue raised.</p> <p>The issues raised relates to design issues which <b>are not a County Development Plan issue</b>.</p> <p>The Draft Plan supports suitable access and permeability for all including persons with disabilities including improvements to walking and cycling networks, transport, streets and public spaces in the following Policy Objectives:</p> <ul style="list-style-type: none"> <li>• Policy Objective T10</li> <li>• Policy Objective T30: Accessibility.</li> </ul> <p>As set out in previous response It is considered appropriate to amend Section 5.7.9 with regard to the policy matter raised with regard to the 'whole journey approach'.</p> <p><b>Recommendation</b>  <b>Amend Section 5.7.9 (p 114) by adding the paragraph as set out in the previous submission.</b></p>
iii) Provide some electric wheel chair bikes with custom wheelchairs to be added and used by the sea or in parks.	<u>B0035</u>	2	<p>The Executive notes the issue raised. <b>This issue is not considered to be a Development Plan issue.</b></p> <p>The Council through a partnership between DLR Sports Partnership, The Bike Hub, and Cycling Without Age, are providing older adults and people with a disability the opportunity on a trial basis to use a range of inclusive bikes to cycle along the Coastal mobility route for free. It is hoped that this service will extend to other accessible and suitable routes across the County in due course subject to the availability of funding.</p> <p><b>Recommendation</b>            No change to Draft Plan.</p>
<b>3.5.7: Ports</b>			
<b>3.5.7.1: Policy Objective T32: Access and Ports</b>			
i) A new ferry service from Dún Laoghaire for non-commercial traffic is required.	<u>B1157</u> <u>B0992</u>	3	<p>The Executive notes the issue raised.</p> <p><b>This is not a County Development Plan issue.</b> DLR is not the operator of public transport services.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>Notwithstanding this the Executive recognises the future development of the harbour offers unparalleled opportunities as it repositions itself from its previous role as a commercial port to a marine, leisure, tourism, heritage and enterprise destination. A study (Economic Plan for Dún Laoghaire Harbour) has been commissioned to make recommendations as to the future use and redevelopment of the harbour and its full integration with the town. In addition to this a further study 'Spatial and Economic Strategy for Dún Laoghaire Town' has been commissioned on the future of the town. It is not proposed to integrate additional Policy Objectives into the Draft Plan in advance of the recommendations from the studies being received and considered. They can be considered in the future LAP for Dún Laoghaire.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.5.8: Contributions</b>			
<p>ii) The Section 49 Development Contribution scheme in the Kiltiernan-Glenamuck area is impacting affordability and increasing the cost of properties for citizens.</p>	<b>B0840</b>		<p>The issue raised is noted by the Executive.</p> <p>Policy Objective T33: Section 48 and 49 Levies refers to the strategic issue of the Council utilising Section 48 and 49 Schemes to generate financial contributions towards the capital costs of providing strategic infrastructure, services or projects in the County. The process of preparing the Schemes is a reserved function which has a separate legal process to the preparation of the County Development Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.5.9: Miscellaneous</b>			
<p>i) Request proof that the roadway at the Dundela Avenue extension has been taken in charge. In the absence of proof that the roadway has been taken in charge requests that the roadway be described as a private road in the Plan.</p>	<b>B0582</b>		<p>The Executive notes the issue raised.</p> <p><b>This is not a County Development Plan issue</b> but a taking in charge/ownership issue which is not within the scope of the County Development Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
ii) St. Columille's Hospital acknowledges the positive benefits of future transport infrastructure works proposed which would increase accessibility to the hospital and request that these are discussed with the HSE to ensure that they do not undermine the operation or future development of the hospital.	<b><u>B0436</u></b>	10	The Executive notes the issue raised, however, this is <b>not considered to be a County Development Plan issue.</b>  <b>Recommendation</b> No change to Draft Plan.
iii) Rural road networks should be maintained to an acceptable standard equitable to road standards in urban areas.	<b><u>B0302</u></b>		The Executive notes the issue raised.  <b>This is not a County Development Plan issue but an operational maintenance issues which is not within the scope of the County Development Plan.</b>  <b>Recommendation</b> No change to Draft Plan.
iv) An underground multi-storey car park should be built in UCD, next to the new residential units built in the last year.	<b><u>B0587</u></b>		The Executive notes the issue raised, however, this is <b>not considered to be a County Development Plan issue.</b>  <b>Recommendation</b> No change to Draft Plan.
v) Submission objects to proposed cycle route, concern about safety risks with an increase of cyclists.	<b><u>B0485</u></b>		Executive notes the issues raised in the submission, however, no location or address is given.  <b>Recommendation</b> No change to Draft Plan.
vi) Upgrades are needed on the Road markings and signage on the Upper Kilmacud road	<b><u>B1136</u></b>	2, 6	The Executives notes the issue raised, however, this <b>is not considered to be a County Development Plan issue, rather, it is an operational issue.</b>  <b>Recommendation</b> No change to Draft Plan.



### 3.6: Chapter 6 - Enterprise and Employment

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<b>3.6.1 DLR Employment Profile</b>			
i) Recommends a skills audit be undertaken to establish what skills are in existence and what skills are required by employers in the County.	<b>B0840</b>		<p>The Executive notes the issue raised.</p> <p>Section 6.3.1 of the Draft Plan sets out an Employment Profile of the County and includes both an overview of the occupational composition and occupational trends in DLR. In addition, Section 6.3.2 provides an overview of sectoral trends. These analyses provide an evidence-based approach to inform the Enterprise and Employment Strategy for the County, as set out in Section 6.4.1 of Chapter 6, and the Policy Objectives contained within. It is considered that the analyses undertaken, and incorporated into the Draft Plan, are sufficiently detailed for the purpose of informing, at a strategic level, the Enterprise and Employment Strategy for the County.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<b>3.6.2 Enterprise and Employment - Strategy and Policies Objectives</b>			
i) Highlights the need to re-evaluate the promotion of Dublin as a global city region due to the impact of Brexit and Covid-19.	<b>B0840</b>		<p>The Executive notes the issue raised.</p> <p>The NPF supports the future growth and success of Dublin as Ireland's leading global city of scale. The RSES, which sets out the Economic Strategy for the Eastern and Midlands Region, seeks to promote Dublin as a global city region and protect and enhance international connectivity, including ports and airports and promote the Region as a gateway to Ireland.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
ii) Submission considers that the Draft Plan supports the rights of every person to have an opportunity to get a job, go to work and earn a decent wage. It also helps workers with opportunities to up-skill and retrain so people have continued opportunities throughout their working life.	<b>B0942</b>		<p>The Executive welcomes the comments made.</p> <p><b>Recommendation</b> No change to Draft Plan</p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
<p>iii) States that the Plan must create the right conditions for the creation of jobs in the right locations.</p>	<p><b>B1047</b></p>		<p>The Executive agrees with the submission.</p> <p>It is considered that the Draft Plan provides the appropriate planning policy framework to support economic activity and employment growth within a spatially coherent framework. The Enterprise and Employment Strategy, set out in Section 6.4.1 of the Draft Plan, recognises that the success of enterprise and employment in the County is intertwined with maintaining and enhancing the attractiveness of the County as a high quality place to live, work and visit. Section 6.4.1 recognises that:</p> <p><i>‘It is this wider package, which includes everything from high quality public transport, availability of housing, education infrastructure, quality place-making and heritage, culture, recreational and community facilities, which will ultimately attract business and ensure the County works better for all.’</i></p> <p>It is considered that the above extract could be further broadened to recognise the important role of supporting physical infrastructure and active travel.</p> <p>In spatial terms, the Employment Strategy outlined in both Section 6.4.1 states the following:</p> <p><i>‘The Employment Strategy of this Plan seeks to align strategic employment locations with existing and identified residential growth areas through existing high frequency public transport corridors, thereby minimising the divergence between the places people live and work, increasing the efficiency of land-use, reducing sprawl and minimising carbon footprint.’</i></p> <p>It is considered that the above extract should be further broadened to recognise the important role of active travel in planning for enterprise and employment growth. It is recommended that that a similar amendment is made in Section 2.4.8.5 of Chapter 2.</p> <p><b>Recommendation</b> Amend the text in Section 6.4.1 “Strategy” (p 126) as follows:</p> <p>Existing: <i>The success of enterprise and employment in the County is intertwined with maintaining and enhancing the attractiveness of the County as a high quality place to live, work and visit. It is</i></p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
			<p><i>this wider package, which includes everything from high quality public transport, availability of housing, education infrastructure, quality place-making and heritage, culture, recreational and community facilities, which will ultimately attract business and ensure the County works better for all. In spatial terms, the DLR employment strategy aims to provide for the expansion of employment through the designation of a range of highly accessible employment locations. The Employment Strategy of this Plan seeks to align strategic employment locations with existing and identified residential growth areas through existing high frequency public transport corridors, thereby minimising the divergence between the places people live and work, increasing the efficiency of land-use, reducing sprawl and minimising carbon footprint. The strategy supports the expansion of key strategic employment locations at Sandyford, Cherrywood, Carrickmines and seeks to retain and enhance the important role of employment in the County’s Major Town Centres.</i></p> <p><b>Proposed:</b>  <i>The success of enterprise and employment in the County is intertwined with maintaining and enhancing the attractiveness of the County as a high quality place to live, work and visit. It is this wider package, which includes everything from high quality public transport <u>and active travel, supporting physical infrastructure</u>, availability of housing, education infrastructure, quality place-making and heritage, culture, recreational and community facilities, which will ultimately attract business and ensure the County works better for all. In spatial terms, the DLR employment strategy aims to provide for the expansion of employment through the designation of a range of highly accessible employment locations. The Employment Strategy of this Plan seeks to align strategic employment locations with existing and identified residential growth areas through existing high frequency public transport corridors <u>and active travel</u> thereby minimising the divergence between the places people live and work, increasing the efficiency of land-use, reducing sprawl and minimising carbon footprint. The strategy supports the expansion of key strategic employment locations at Sandyford, Cherrywood, Carrickmines and seeks to retain and enhance the important role of employment in the County’s Major Town Centres.</i></p> <p>Amend the text in Section 2.4.8.5 as follows:</p> <p><b>Existing:</b></p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
			<p><i>In spatial terms, the DLR employment strategy aims to provide for the expansion of employment through the designation of a range of sustainable employment locations. The spatial strategy applies the principles of the circular economy to land-use management through the intensification and redevelopment of existing strategic employment areas within the M50 ring and the activation of key strategic sites such as Cherrywood and Carrickmines which are accessible to public transport. The strategy seeks to align strategic employment locations with existing and identified residential growth areas through high frequency transport and minimise the divergence between the places people live and work, increasing the efficiency of land-use, reducing sprawl and minimising carbon footprint. Table 2.14 provides an overview of the employment potential pertaining to the identified strategic employment locations in DLR.</i></p> <p>Proposed:  <i>‘In spatial terms, the DLR employment strategy aims to provide for the expansion of employment through the designation of a range of sustainable employment locations. The spatial strategy applies the principles of the circular economy to land-use management through the intensification and redevelopment of existing strategic employment areas within the M50 ring and the activation of key strategic sites such as Cherrywood and Carrickmines which are accessible to public transport. The strategy seeks to align strategic employment locations with existing and identified residential growth areas through high frequency transport <u>and active travel thereby minimising</u> <del>and minimise</del> the divergence between the places people live and work, increasing the efficiency of land-use, reducing sprawl and minimising carbon footprint. Table 2.14 provides an overview of the employment potential pertaining to the identified strategic employment locations in DLR.’</i></p>
<b>3.6.2.1 Policy Objective E3: Cultural and Creative Industries</b>			
<p>i) Policy Objective E3: Cultural and Creative Industries could be strengthened by further consideration of ‘creative assets’ and the relationship with the DLR Arts Development Plan. Section 6.4.2.2 is requested to be amended as follows (amendments underlined):</p> <p><i>“Cultural and creative industries, as a subset of the knowledge economy, are an increasingly important</i></p>	<b>B1095</b>		<p>The Executive agrees, in part, with the recommended amendments to Policy Objective E3: Cultural and Creative Industries.</p> <p>The overarching intention of Policy Objective E3 is to recognise and support the role of cultural and creative industries as an increasingly important area of economic growth and employment creation in the County. Notwithstanding, it is acknowledged that in addition to their economic role, these industries/activities perform an important function in terms of social cohesion and on this basis, it is recommended that the text of the Draft Plan is amended to reflect this role.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<p><i>area of economic growth, employment creation <u>and social cohesion</u>. They have been defined <u>as activities and industries which have their origin in individual creativity, skill and talent and which have a potential for wealth and job creation through the generation and exploitation of intellectual property - including areas such as advertising, software, publishing, architecture, music and the visual and performing arts, film, video and photography. There is a growing movement internationally by cities to become recognised and organised as 'creative cities' and in this respect, the location of Ireland's only institute of art, design and technology - IADT - in the County is a significant asset. IADT's strategic vision is to be a leader in higher education with a specialist focus on the development of future makers and shapers, technologists, thinkers, storytellers and creators who lead and innovate in a changing digital world. Other examples of creative and cultural assets in the County include, DLR Lexicon, Mountains to Sea Festival, Pavilion Theatre, Mill Theatre, Bath Studios, Grainstore and Dance Theatre of Ireland along with a strong cohort of individual creative practitioners. The DLR Arts Development Plan 2016-2022 (and its successors) provides the legislative policy framework for cultural development in the County. (see also Chapter 4, People, Homes and Place 4.2.1.9)</u></i></p>			<p>In relation to cultural assets and the DLR Arts Development Plan, the Draft Plan already provides comprehensive support both in a holistic manner throughout Chapter 4 'Neighbourhood – People, Homes and Place' and more specifically under Policy Objective PHP10: Music, Arts and Cultural Facilities which provides policy support for: the continued development of arts and cultural facilities throughout DLR in accordance with the County Arts Development Plan 2016-2022; and, the implementation of the DLR Cultural and Creativity Strategy 2018-2022.</p> <p><b>Recommendation</b> Amend the wording of Section 6.4.2.2 to read as follows:</p> <p><i>'Cultural and creative industries, as a subset of the knowledge economy, are an increasingly important area of economic growth, <del>and</del> employment creation <u>and social cohesion</u>. They have been defined as <u>activities and industries which have their origin in individual creativity, skill and talent and which have a potential for wealth and job creation through the generation and exploitation of intellectual property - including areas such as advertising, software, publishing, architecture, music and the visual and performing arts, film, video and photography. There is a growing movement internationally by cities to become recognised and organised as 'creative cities' and in this respect, the location of Ireland's only institute of art, design and technology - IADT - in the County is a significant asset. IADT's strategic vision is to be a leader in higher education with a specialist focus on the development of future makers and shapers, technologists, thinkers, storytellers and creators who lead and innovate in a changing digital world.'</u></i></p>
<b>3.6.2.2 Policy Objective E5: Education and Skills</b>			
<p>i) Highlights the need to ensure the supply of skills to meet the needs of the high-tech sector.</p>	<b>B0840</b>		<p>The Executive notes the issue raised.</p> <p>The Draft Plan recognises the important role of the high-technology sector as a component of the employment profile in Dún Laoghaire-Rathdown. Section 6.3.2 notes that the focus of job creation in recent years in DLR has been in the high-value services sector with a particular</p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
			<p>focus on the Information and Communication sector and the Professional, Scientific and Technical Activities sector – these sectors experienced the largest occupational growth in the County between the years 2011 and 2016. As stated in Section 6.3.2 it is anticipated that these sectors will continue to perform strongly over the forthcoming Plan period.</p> <p>The Draft Plan recognises that the development of human capital is central to the County’s economic and social development, and this is particularly relevant for ensuring the supply of skills to meet the full range of occupational requirements in the County, including the high-technology sector. Policy Objective E5: Education and Skills is of particular relevance in this regard and seeks to sustain the existing high levels of educational attainment and skilled workforce in the County, to encourage employment generation to maintain this resource within the County and to promote the availability of education opportunities to all residents in Dún Laoghaire-Rathdown. Policy Objective E4: Further and Higher Education Institutions and Policy Objective E5: Education and Skills both acknowledge the importance of Further and Higher Education Institutes and support their continuing presence and growth.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<b>3.6.2.3 Policy Objective E6: Tackling Unemployment</b>			
<p>i) Raises concerns that the labour-intensive sectors will be unable to attract and retain appropriately skilled staff.</p>	<p><b>B0840</b></p>		<p>The Executive notes the issue raised.</p> <p>The Draft Plan acknowledges the importance of technical education and skilled trades. Policy Objective E6: Tackling Unemployment, sets out that it is a Policy Objective to support the work undertaken by the Education and Training Boards in relation to courses provided under SOLAS and the establishment of Community Training Centres, Local Training Initiatives and Specialist Training Provision in the County. Furthermore, as set out in Section 6.4.2.5, the Council will support and facilitate a policy which will seek to employ skilled trades people to facilitate the employment of apprentices.</p> <p>It is considered that the Draft Plan provides the appropriate strategic level planning policy framework to support the work undertaken by the training and educational providers in their respective roles, which include the development of skilled trades.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
<p>ii) The Council should play a role in targeting initiatives that can provide jobs to the younger generation.</p>	<p><b>B0942</b></p>		<p>No change to Draft Plan</p> <p>The Executive notes the issue raised.</p> <p>While the Executive does not disagree with the sentiments of the submission it is considered that the identification of and introduction of specific initiatives relating to the provision of jobs for the younger generation <b>is not a County Development Plan issue.</b></p> <p>Notwithstanding, it is highlighted that the Draft Plan does recognise under Policy Objective E6: Tackling Unemployment that areas of higher unemployment, specifically among the younger population, do not always benefit from a focus on Further and Higher Education, jobs in the IT sector or enterprise, and would benefit more by the provision of alternative forms of training and skills development. In this regard, Policy Objective E6 seeks to support the work undertaken by the Education and Training Boards in relation to courses provided under SOLAS and the establishment of Community Training Centres, Local Training Initiatives and Specialist Training Provision in the County. Furthermore, as set out in Section 6.4.2.5, the Council will support and facilitate a policy which will seek to employ skilled trades people to facilitate the employment of apprentices.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p><b>3.6.2.4 Policy Objective E9: Smart Dublin</b></p>			
<p>i) Welcomes the Council’s support for Smart Dublin. Requests that additional text is added under Policy Objective E9: Smart Dublin, to reflect Smart Tourism. The additional text proposed is as follows:</p> <p><i>‘Smart Tourism is an important component of the Smart City concept and refers to the use of information and communication technology to develop innovative tools and approaches to improve tourism.’</i></p>	<p><b>B0896</b></p>		<p>The Executive agrees with the issue raised.</p> <p>The Executive acknowledges the opportunities of Smart Tourism which focuses on introducing new technology and supporting innovation in the tourism industry, and its role as a component part of the Smart Dublin initiative.</p> <p><b>Recommendation</b> Add a paragraph at the end of Section 6.4.2.8 to read as follows:</p> <p><i><u>‘Smart Tourism is an important component of the Smart City concept and refers to the use of information and communication technology to develop innovative tools and approaches to improve tourism.’</u></i></p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<b>3.6.2.5 Policy Objective E10: Office Development</b>			
<p>i) Supports the establishment of remote working hubs.</p> <p>Highlights the recently published National Remote Work Strategy and questions how this will input into the Draft Plan.</p> <p>Support and facilitate the establishment of co working / remote working hubs and creative hubs.</p>	<p><b><u>B0627</u></b> <b><u>B0942</u></b></p>		<p>The Executive notes the issue raised.</p> <p>The National Remote Working Strategy was published in January 2021 and sets out the Government's vision to ensure remote working is a permanent feature in the Irish workplace in a way that maximises economic, social and environmental benefits. To achieve this the Strategy sets out three Pillars: Pillar One is focussed on creating a conducive environment for the adoption of remote work; Pillar Two highlights the importance of the development and leveraging of remote work infrastructure to facilitate increased remote work adoption; and, Pillar Three is centred on maximising the benefits of remote work to achieve public policy goals.</p> <p>In recognition of the recently published National Remote Working Strategy (2021), and to support changing workplace practices, it is recommended that a new Policy Objective is included in Chapter 6 'Enterprise and Employment' to support remote working, and in particular, the development of remote work infrastructure.</p> <p>In addition, it is recommended that the National Remote Work Strategy is included in Appendix 13 of the Draft Plan which lists the principal international national, regional and local policy documents, guidelines and plans that have helped inform and guide the preparation of the County Development Plan.</p> <p><b>Recommendation</b> Include a new Policy Objective as follows (all Section and Policy Objective numbering to be subsequently amended):</p> <p><b><u>6.4.2.10 Policy Objective E11: Remote Working</u></b></p> <p><b><u>It is a Policy Objective to implement the National Remote Working Strategy and promote and assist in the provision of remote working infrastructure in appropriate locations and in particular, where these uses contribute to town centre regeneration, facilitate the reuse of existing and historic buildings, and bring added activity and vibrancy to the area.</u></b></p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
			<p><u>One way to facilitate a reduction in commuting distances and times, while still allowing workers to gain access to office space outside of the home, is the development of remote working hub infrastructure in our centres and employment areas to facilitate ‘hubwork’. Hubwork is defined in the National Remote Working Strategy as ‘an arrangement where an employee works from a hub close to or within their local community, either exclusively or some of the time’. These facilities can offer people the potential to gain access to quality office facilities and technology, meeting spaces, and social interaction and collaboration without requiring a person to commute the full distance to their workplace. These spaces also offer the potential for increased activity and a broader employment base within our major town, district and neighbourhood centres, where vacant commercial space may be an increasing issue going forward, particularly given changes in the retail sector and a move toward online shopping. The reuse of existing buildings for these purposes can also aid in the regeneration of historic buildings, potentially offering a viable option for reuse. The provision of these spaces ties in with the 5 Strategic County Outcomes in the Plan and the concept of the ten minute neighbourhood. For clarity proposals shall be assessed under office use class.</u></p> <p><u>In neighbourhood centres such proposals will be assessed having regard to ensuring an appropriate mix of uses in the wider area and in accordance with the land use zoning objectives set out in Chapter 13.</u></p> <p>Amend Section 13.6 of Appendix 13: Policy Context, to include the following text:</p> <p><u>‘DETE (2021) Making Remote Work - National Remote Working Strategy <a href="https://assets.gov.ie/119312/299c21e9-9ec6-4dab-a7fe-71bd0da3e1d0.pdf">https://assets.gov.ie/119312/299c21e9-9ec6-4dab-a7fe-71bd0da3e1d0.pdf</a> The National Remote Working Strategy sets out the Government’s vision to ensure remote working is a permanent feature in the Irish workplace in a way that maximises economic, social and environmental benefits.</u></p> <p>Include the following acronym on page 332 of Appendix 13: Policy Context:</p> <p><u>DETE: Department of Enterprise, Trade and Employment (in use)</u></p>
<p>ii) There is a need to avoid strategic employment locations becoming ‘dead zones’ after 6pm and</p>	<p><b>B0840</b></p>		<p>The Executive notes the issue raised.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<p>submission recommends that research is undertaken to identify 'humane' models of office development of scale, that remain safe and vibrant living spaces, 24/7.</p>			<p>The Employment Strategy of the Draft Plan supports the expansion of key strategic employment locations at Sandyford, Cherrywood and Carrickmines. The development of these strategic employment locations is supported by a plan-led approach to development which identifies a range of differentiated and proximate land use zonings thus ensuring the creation of safe and vibrant areas with an identifiable sense of place. In addition, the Employment Strategy seeks to retain and enhance the important role of employment in the County's Major Town Centres, which comprise an established mix of uses.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.6.2.6 Policy Objective E11: Enterprise Incubator Units</b>			
<p>i) The Lexicon and its facilities are used by many sole traders and contractors and there might be room to give them more assistance or to use the library as an outreach facility or an ad hoc incubator for new enterprises.</p>	<b>B0905</b>		<p>The Executive notes the issue raised.</p> <p>While the Executive recognises the role of libraries as an important facility for members of the public to gain access to a range of valuable resources, <b>it is considered that the specific day-today services offered by DLR's libraries is primarily an operational matter for the Council and not a County Development Plan issue.</b></p> <p><b>Recommendation</b> No change to Draft Plan</p>
<b>3.6.2.7 Policy Objective E15: Home Working/E-Working</b>			
<p>i) Working from home needs to be considered.</p>	<b>B0923</b>		<p>The Executive notes the issue raised.</p> <p>The Council acknowledges the increasing role and importance of home-working / 'e-working' in our economy. Policy Objective E15: Home Working / E-Working makes provision to permit home-based economic activities where, by virtue of their nature and scale, they can be accommodated without detriment to the amenities of residential areas.</p> <p><b>Recommendation</b> No change to Draft Plan</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<b>3.6.2.8 Policy Objective E16: Tourism and Recreation</b>			
i) Geology has become a large part of Irish tourism and should comprise a significant part of any tourism initiative that may be introduced.	<b>B0249</b>		<p>The Executive notes the issue raised.</p> <p>The DLR Tourism Strategy &amp; Marketing Plan 2017–2022 is the Council's detailed strategy for the development of the County's tourism product. The geology of DLR is specifically recognised as part of the resource base for tourism in the County in Section 2.2.1 of the Tourism Strategy, which notes that '<i>...geology forms the basis of the surface undulations, peaks, valleys and coastal shoreline that underpins everything great Dún Laoghaire-Rathdown can offer its visitors.</i>' As provided under Policy Objective E16: Tourism and Recreation, the Council will promote the implementation of the Dún Laoghaire-Rathdown Tourism Strategy &amp; Marketing Plan 2017–2022 and any subsequent update thereof.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
ii) Requests the inclusion of planning policies to support the provision of development on Coillte lands where suitable; to provide, for example, tourism/recreation, commercial, community and/or other uses.	<b>B0563</b>		<p>The Executive notes the issue raised.</p> <p>The Local Authority acknowledges Coillte's commitment to recreation and nature which is underpinned by its membership of the Dublin Mountain Partnership, and more recently through the establishment of 'Coillte Nature', which is dedicated to addressing the biodiversity and climate change crises through the reconfiguration of native woodlands and restoration of biodiversity areas. The Draft Plan includes a number of Policy Objectives which support the sustainable management of recreation in the Dublin Mountains including inter alia: GIB12: Access to Natural Heritage; GIB13: Dublin Mountains Strategic Plan; GIB14: Public Rights-of-Way; GIB15: Recreation Access Routes; GIB16: National Park; and, GIB17: Trails, Hiking and Walking Routes.</p> <p>From a tourism perspective, Policy Objective E16: Tourism and Recreation, provides that it is a Policy Objective to co-operate with the appropriate agencies in promoting sustainable tourism and securing the development of tourist and recreation orientated facilities in the County. The Dublin Mountains Partnership which comprises the Local Authorities of Dún Laoghaire-Rathdown, South Dublin and Wicklow, together with Coillte and a range of voluntary groups is a prime example of this co-operative approach to tourism. Specific Local Objective 96 on Land Use Map 11 of the Draft Plan provides the following support:</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<p><i>'Through the Council's membership of the Dublin Mountains Partnership (DMP), to improve the recreation potential of the public lands in the Dublin Mountains.'</i></p> <p>The Dún Laoghaire-Rathdown Tourism Strategy &amp; Marketing Plan 2017–2022 is the Council's detailed strategy for the development of the County's tourism product and includes a number of initiatives relating to the rural uplands, which are primarily set out under the 'Well Worth The Climb' project. The Tourism Strategy specifically recognises the role of the Coillte Forest Parks including Ticknock, Kilmashogue, Tibbradden and Barnaslingan and the range of recreational activities including the Ticknock Mountain Bike Trail, Zipit at Tibbradden and the Scouting centre at Tibbradden.</p> <p>It is highlighted that the Coillte forest parks are primarily located in lands zoned Objective 'G' - <i>'To protect and improve high amenity areas'</i>. These are the most sensitive and highly protected areas in the County. In recognition of their high amenity value, and to support the sustainable management of recreation and tourism in the County, it is considered appropriate that any proposals for development should be assessed through the development management process where a range of uses are considered 'Open for Consideration' at Objective 'G' zoned lands.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>iii) Requests the inclusion of a new objective in the County Development Plan as follows:</p> <p><i>'The Council will engage with all relevant stakeholders, including Fáilte Ireland, to establish and develop a Food Tourism Network in the County, maximising the County's renowned food offering and integrate with hiking and walking routes and trails including coastal, sea based, and long-distance hiking trails in the Dublin Mountains, and cultural and historic sites and events. The Council will support the addition of small-scale alternative</i></p>	<b>B0790</b>		<p>The Executive does not agree with the issue raised.</p> <p>The objective requested to be included in the County Development Plan can be broken down into two component parts: firstly, the establishment of a Food Tourism Network in the County; and secondly, support for small-scale alternative accommodation for the tourism industry. These separate elements will be addressed in turn.</p> <p>Regarding the establishment of a Food Tourism Network, it is considered that the level of detail requested extends beyond the strategic level policies on tourism included in the County Development Plan. The food offer in DLR comprises an integrated component of the existing DLR Tourism Strategy &amp; Marketing Plan 2017–2022 and, as provided under Policy Objective E16: Tourism and Recreation, the Council will promote the implementation of the Dún Laoghaire-Rathdown Tourism Strategy &amp; Marketing Plan 2017–2022 and any subsequent</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<i>accommodation to support the wider tourism industry in the County.'</i>			<p>update thereof. Furthermore, collaboration with relevant stakeholders in promoting sustainable tourism is already provided for under Policy Objective E16: Tourism and Recreation, which states that it is a Policy Objective to co-operate with the appropriate agencies in promoting sustainable tourism and securing the development of tourist and recreation orientated facilities in the County.</p> <p>In addition, the DLR Local Economic and Community Plan already includes a specific action relating to inter alia food trails in collaboration with Fáilte Ireland and relevant stakeholders including the Dublin Mountain Partnership. Action 5.7 of the LECP is as follows: <i>'Create and promote new tourism trails centred around food, heritage, marine and ecology, rural and mountain experiences, and various literary and cultural attractions'</i>.</p> <p>See response below and response and recommendation in Section 3.14 in relation to tourist accommodation.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
iv) The County Development Plan should plan for tourism in the rural uplands of DLR and include objectives to reflect same, including the need for sensitive sustainable accommodation.	<b><u>B0840</u></b>		<p>The Executive notes the issue raised.</p> <p>The Executive acknowledges that tourism is an important part of the rural economy. It is considered, however, that both the DLR Tourism Strategy &amp; Marketing Plan 2017–2022 and the DLR Local Economic Community Plan already contain sufficient provision to support tourism in the rural uplands of the County.</p> <p>The DLR Tourism Strategy &amp; Marketing Plan 2017–2022 is the Council's detailed strategy for the development of the County's tourism product and includes a number of initiatives relating to the rural uplands, which are primarily set out under the 'Well Worth The Climb' project. As provided under Policy Objective E16: Tourism and Recreation, the Council will promote the implementation of the Dún Laoghaire-Rathdown Tourism Strategy &amp; Marketing Plan 2017–2022 and any subsequent update thereof. Action 5.2 of the DLR Local Economic Community Plan also acknowledges the role of the rural/mountain area as part of the tourism potential in the County, and under Action 5.2 sets out to <i>'Build on DLR's natural environment, including rural/mountain and marine location, and cultural and heritage assets, to enhance marketing</i></p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<p><i>and promotion of DLR as a short-stay destination (and as a 3-5 day Dublin area base) for overseas visitors to the Dublin area.'</i></p> <p>With respect to sensitive tourism related sustainable accommodation in the rural uplands of the County, Section 12.3.14 of the Draft Plan states that caravan and camping sites “<i>will generally be permitted in rural areas zoned ‘B’ where the topography would permit their siting without injury to amenity or public health. In rural areas zoned ‘GB’ holiday caravan sites are not ‘permitted in principle’ but may be ‘open for consideration’ depending on circumstances’.</i> In order to protect the rural character of Objective ‘G’ zoned areas, caravan and camping sites are neither ‘permitted in principle’ nor ‘open for consideration’ in this zoning objective.</p> <p>Whilst the Executive would have concerns allowing camping/caravan facilities to be open for consideration in the entire ‘G’ zoning objective, the Executive considers that there is limited potential for the provision of a number of small scale camping facilities to be located at Glencullen - without undermining the overall objective ‘G’ zoning of the area. This matter is addressed and a recommended amendment to the Draft Plan is proposed in response to Submission No. B0892 (see Section 3.14).</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
v) Suggests a long term strategy and sufficient resources are put in place to ensure that a vibrant tourism and hospitality industry returns post Covid-19.	<b><u>B0840</u></b>		<p>The Executive notes the issue raised.</p> <p>The promotion of sustainable tourism in the County is an ongoing objective of the Council. Under Policy Objective E16: Tourism and Recreation, it is a Policy Objective to co-operate with the appropriate agencies in promoting sustainable tourism and securing the development of tourist and recreation orientated facilities in the County. Furthermore, the Council will promote the implementation of the Dún Laoghaire-Rathdown Tourism Strategy &amp; Marketing Plan 2017–2022.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
vi) Submission makes a number of recommendations with regards to tourism in the County:	<b><u>B0896</u></b>		The Executive welcomes the substantial and positive submission from Fáilte Ireland.

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<ul style="list-style-type: none"> <li>• Requests the inclusion of a dedicated Chapter on tourism.</li> <li>• Requests the inclusion of an objective supporting the preparation and implementation of Regional Tourism Plans and to support the continued collaboration with Fáilte Ireland and tourism stakeholders to ensure their successful implementation and delivery.</li> <li>• Recommends continued investment in pedestrian and cyclist facilities near the County's rivers and seafront.</li> <li>• Recommends that continued partnership and collaboration between Fáilte Ireland and DLR should be supported in the County Development Plan.</li> <li>• Highlights the potential role of Dún Laoghaire Harbour as a sustainable activity-based tourism economic driver.</li> <li>• Requests the inclusion of an objective for the Council to support all tourism initiatives developed in collaboration with Fáilte Ireland, such as the Dublin Coastal Trail, in terms of marketing and communication of the trail.</li> <li>• Recommends the County Development Plan should position Dún Laoghaire as the gateway from the City to the Dublin Mountains and support greater access to the Dublin Mountains and the Coast via public transport options.</li> <li>• Considers the County Development Plan would benefit from a section on Accessible Tourism and the incorporation of a Policy Objective as follows:</li> <li>• <i>'It is a Policy Objective of the Council to support the provision of accessible tourism.'</i></li> </ul>			<p>While the Executive acknowledges the value of many of the recommendations outlined in the submission, it is considered that the DLR Tourism Strategy and Marketing Plan 2017–2022 and the DLR Local Economic and Community Plan already address many of the recommendations that are raised. The DLR Tourism Strategy and Marketing Plan includes objectives and related actions, centring on the journey, awareness, experiences, collaboration and marketing, and seeks to improve arrival and wayfinding information, create new experiences and link destinations and enhance the marketing of the County. Visitor Maps were prepared in conjunction with the Strategy and illustrate the many tourist trails and assets in the County. It is considered that the DLR Tourism Strategy and Marketing Plan is the appropriate mechanism for setting out DLR's comprehensive strategy for tourism and it is not considered necessary to include a dedicated Chapter on tourism in the County Development Plan. Policy Objective E16: Tourism and Recreation provides the strategic level support for the ongoing implementation and the delivery of the Strategy.</p> <p>One of the primary economic objectives of the DLR Local Economic and Community Plan is to realise the potential of tourism in the County and a myriad of detailed actions are set out in Table 3.5 of the LCEP to support this objective. These actions include: the enhancement of marketing and promotion of the County as a short-stay destination for overseas visitors to the Dublin area; the exploration of funding opportunities to support the development of the marine leisure, tourism, recreation and culture sectors; the development of tourism trails based on different themes; the continued development of festivals and events based tourism; ensuring best practice planning and conservation practices for the protection of heritage assets in the County; supporting the development of Dún Laoghaire Harbour as a leading visitor attraction; and maintaining and marketing an inventory of tourism attractions in the County. Under Policy Objective E1 – Local Economic Community Plan, it a Policy Objective to support the review and preparation of a new Local Economic Community Plan for DLR, and it is anticipated that tourism will comprise an important element of the new Plan.</p> <p>Many of the projects and plans referenced in the submission are collaborative tourism initiatives between Fáilte Ireland, the Council and other relevant stakeholders. This collaborative approach to the promotion of sustainable tourism in DLR is fully supported at the strategic level under Policy Objective E16: Tourism and Recreation, which provides that it is a Policy Objective to co-operate with the appropriate agencies in promoting sustainable tourism and securing the development of tourist and recreation orientated facilities in the</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<ul style="list-style-type: none"> <li>• Requests that support for festivals is specifically supported in the County Development Plan.</li> <li>• Considers the County Development Plan should incorporate a Policy Objective on Urbact, as follows:</li> <li>• <i>'It is a Policy Objective of the Council to support the implementation of the Urbact Integrated Action Plan in respect of Tourism Friendly Cities.'</i></li> <li>• Requests the Dublin Brand Proposition including 'Dublin' identification and branding is integrated into the County Development Plan, and that an objective aligning with, supporting and promoting the initiative is included.</li> <li>• Requests the inclusion of a new Policy Objective relating to visitor experience, as follows:</li> <li>• <i>'It is a Policy Objective to support the development and implementation of Destination and Experience Development Plans through continued collaboration with Fáilte Ireland and tourism stakeholders.'</i></li> <li>• Changes to text in the Draft Plan are recommended as follows: Page 132/133 – 'Destination and Experience Development Plans'. Page 132 – <i>'The Council acknowledges Fáilte Ireland's intentions to activate a Destination and Experience Development Plan (DEDP) for the Coast and develop one for the Mountains of Dublin...'</i></li> <li>• Requests the inclusion of a map to illustrate the tourism and recreation strategy for the County.</li> </ul>			<p>County. The success of this collaborative approach can be seen in many of the tourism projects and initiatives currently being progressed including the Tourism Friendly Cities Project, in association with 9 other cities chosen by Urbact, and Fáilte Ireland's Dublin Coastal Trail. It is considered that while tourism projects and initiatives will evolve and change over time, it is the collaborative relationship to the promotion and implementation of projects which will ensure ongoing sustainable improvements in the tourism sector over the long term.</p> <p>With respect to accessible tourism, the Executive fully supports the development of tourism which is accessible and inclusive to all. The Council recently announced the introduction of the Bikehub project which provides a new free inclusive bike rental scheme that will offer all abilities and ages the opportunity to take part in cycling along the Coastal Mobility Route in Dún Laoghaire, which will extend to other accessible and suitable routes across the County, in due course. It is considered that additional text should be included in Section 6.4.2.15 of the Draft Plan to reflect the Council's support for the provision of accessible tourism.</p> <p>In formulating this response, the Executive have in accordance with section 12 (8)(b)(iii) of the Planning and Development Act, 2000, (as amended) taken account of the following strategic direction received from the Elected Members at pre-draft stage: <i>'That the Chief Executive ensures that inclusivity as a theme permeates through relevant policies of the Draft Plan'</i>.</p> <p>The recommended changes to text relating to Destination and Experience Development Plans comprise a change in terminology used by Fáilte Ireland. On this basis, it is considered that the Draft Plan should be amended to reflect same. Section 6.4.2.15 acknowledges and supports Fáilte Ireland's intentions to develop Destination and Experience Development Plans for the Coast and the Mountains of Dublin. In light of the support already provided in the Draft Plan it is not considered necessary to include an additional Policy Objective.</p> <p><b>Recommendation</b> Amend the first paragraph of Section 6.4.2.15 (p. 132) as follows:</p> <p><i>'Tourism is one of the most important indigenous economic sectors in the County, the Region and the State. The Council recognises the direct employment potential of tourism and recreation to the local economy, in addition to the significant secondary benefits for many other sectors such as food and beverage, accommodation providers, transport and retail. It is</i></p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<p><i>Council policy to co-operate with the appropriate agencies in promoting sustainable tourism and securing the development of tourist and recreation orientated facilities in the County. Furthermore, the Council will support the development of accessible and inclusive tourism.'</i></p> <p><i>Amend the last paragraph in Section 6.4.2.15 (pp 132 and 133) as follows:</i></p> <p><i>'The Council acknowledges Fáilte Ireland intentions to <del>develop</del> activate a <del>Visitor</del> Destination and Experience Development Plans (VD<del>EDP</del>'s) for the Coast and develop one for the Mountains of Dublin, both of which are key tourism and recreational assets for DLR. The VD<del>EDP</del>'s will identify the key assets of each area and provide a framework to present the experiences and stories of that area in a way that tourists can readily and easily understand. They will identify tangible actions and a process for businesses to shape their respective tourism experience in line with the overall brand proposition and the key motivating themes for their area. The Council will support Fáilte Ireland in their preparation of the VD<del>EDP</del>'s.'</i></p>
<p>vii) Requests the inclusion of planning policies to support the provision of development on Coillte lands where suitable; to provide, for example, tourism/recreation, commercial, community and/or other uses.</p>	<p><b>B0563</b></p>		<p>The Executive notes the issue raised.</p> <p>The Local Authority acknowledges Coillte's commitment to recreation and nature which is underpinned by its membership of the Dublin Mountain Partnership, and more recently through the establishment of 'Coillte Nature', which is dedicated to addressing the biodiversity and climate change crises through the reconfiguration of native woodlands and restoration of biodiversity areas. The Draft Plan includes a number of Policy Objectives which support the sustainable management of recreation in the Dublin Mountains including inter alia: GIB12: Access to Natural Heritage; GIB13: Dublin Mountains Strategic Plan; GIB14: Public Rights-of-Way; GIB15: Recreation Access Routes; GIB16: National Park; and, GIB17: Trails, Hiking and Walking Routes.</p> <p>From a tourism perspective, Policy Objective E16: Tourism and Recreation, provides that it is a Policy Objective to co-operate with the appropriate agencies in promoting sustainable tourism and securing the development of tourist and recreation orientated facilities in the County. The Dublin Mountains Partnership which comprises the Local Authorities of Dún Laoghaire-Rathdown, South Dublin and Wicklow, together with Coillte and a range of voluntary groups is a prime example of this co-operative approach to tourism. Specific Local Objective 96 on Land Use Map 11 of the Draft Plan provides the following support:</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<p><i>'Through the Council's membership of the Dublin Mountains Partnership (DMP), to improve the recreation potential of the public lands in the Dublin Mountains.'</i></p> <p>The Dún Laoghaire-Rathdown Tourism Strategy &amp; Marketing Plan 2017–2022 is the Council's detailed strategy for the development of the County's tourism product and includes a number of initiatives relating to the rural uplands, which are primarily set out under the 'Well Worth the Climb' project. The Tourism Strategy specifically recognises the role of the Coillte Forest Parks including Ticknock, Kilmashogue, Tibbradden and Barnaslingan and the range of recreational activities including the Ticknock Mountain Bike Trail, Zipit at Tibbradden and the Scouting centre at Tibbradden.</p> <p>It is highlighted that the Coillte forest parks are primarily located in lands zoned Objective 'G' - <i>'To protect and improve high amenity areas'</i>. These are the most sensitive and highly protected areas in the County. In recognition of their high amenity value, and to support the sustainable management of recreation and tourism in the County, it is considered appropriate that any proposals for development should be assessed through the development management process where a range of uses are considered 'Open for Consideration' at Objective 'G' zoned lands.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.6.2.9 Policy Objective E17: Maritime Economy</b>			
<p>i) Suggests that Policy Objective E17: Maritime Economy –would benefit from a better understanding of the physical infrastructure required to support the maritime economy.</p>	<b>B0426</b>		<p>The Executive notes the issue raised.</p> <p>An explanation of the Maritime Economy is included in the Glossary of the Draft Plan (see page 353) as follows:</p> <p><i>'The maritime economy is now often referred to as the 'blue economy'. It covers all marketable activities linked to the sea. The link between activities and the sea may be explained by the use of marine resources, maritime areas or regions or by the vicinity of these spatial units.'</i></p> <p>The overarching intention of Policy Objective E17: Maritime Economy is to provide strategic level support for the sustainable development of the maritime economy as an important component part of the economic and enterprise strategy for the County. As noted in the text</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<p>accompanying Policy Objective E17, the maritime economy incorporates a broad range of sub-sectors including amongst other, shipping, maritime transport, sea fisheries, aquaculture, tourism and energy. The Executive does not consider that the inclusion of text relating to the physical infrastructure of the maritime economy would contribute to the overarching intention of the Policy Objective, which is to provide strategic level support for the sustainable development of the maritime economy as a whole.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Importance of ports, jetties, quays and piers to the local economy as well as their role as recreational and amenity facilities needs more attention.</p>	<p><b>B0302</b></p>		<p>The Executive notes the issue raised.</p> <p>The National Ports Policy (2013) recognises Dún Laoghaire Port as a marine related asset and the EMRA RSES recognises Dún Laoghaire Port as a port of Regional significance and as an economic driver to the Region. In line with these national and regional designations, Policy Objective T32: Access and Ports, provides that <i>'It is a Policy Objective to improve access to and support the continued development of Dún Laoghaire Port as a marine related asset in accordance with the 2013 'National Ports Policy'.</i></p> <p>With respect to the role of jetties, quays and piers to the local economy, Policy Objective E17: Maritime Economy, provides strategic level support for the sustainable development of the maritime economy.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>iii) ORE Policies 10 and 11 of the draft National Marine Planning Framework recognise the significant opportunity for economic development and enterprise in coastal Local Authorities, such as Dún Laoghaire-Rathdown, to support the offshore wind industry, such as development of existing harbour infrastructure and associated services.</p> <p>Dún Laoghaire Harbour has significant potential for the location of Operations and Maintenance Hub for</p>	<p><b>B1029</b></p>		<p>The Executive notes the issue raised.</p> <p>Policy Objective E17: Maritime Economy provides strategic level support for the sustainable development of the maritime economy. The Energy sector is specifically identified in Section 6.4.2.16 as a sub-sector of the maritime economy.</p> <p>In relation to policies identified in the National Marine Planning Framework, Policy Objective GIB7: National Marine Planning Framework (NMPF) states that It is a Policy Objective to support the policies and objectives as appropriate and relevant of the forthcoming NMPF with respect to the conservation, management, and protection for a sustainable future for the</p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
<p>the offshore wind industry, as well as additional direct and indirect employment opportunities.</p>			<p>marine area. It is noted that since the publication of the Draft Plan the National Marine Planning Framework has been adopted. It is therefore considered that the Draft Plan should be updated accordingly.</p> <p>With regards to Dún Laoghaire Harbour the Council has commissioned a study to make recommendations as to the future use and redevelopment of the Harbour and its integration with the Town. It is not proposed to integrate additional Policy Objectives into the County Development Plan, rather, the studies will inform the future Local Area Plan.</p> <p><b>Recommendation</b> Amend Policy Objective GIB7 (p161) from:</p> <p><i>8.5.1 Policy Objective GIB7: National Marine Planning Framework (NMPF) It is a Policy Objective to support the policies and objectives as appropriate and relevant of the forthcoming National Marine Planning Framework (NMPF), with respect to the conservation, management, and protection for a sustainable future for the marine area.</i></p> <p><i>The Government have produced a consultation draft NMPF, which sets out a vision, objectives, and policies to aid draft decision making in the marine area. It is an important component piece of progressing towards the adoption of a National Marine Plan, which is required under EU Directive 2014/89/EU, to be in place by 2021. Part V of the Planning and Development (Amendment) Act 2018 transposes the Directive into primary legislation. It is important to note that Section 68 states that Part V, “shall not apply to those parts of the nearshore areas to which a Development Plan, a Local Area Plan, the NPF, a RSES, a guidance on a directive under Part 11 of the principle Act applies”. The draft NMPF also references the Marine Planning and Development Management Bill, which introduces a “single development management process for the maritime area for activities and development to be administrated by An Bord Pleanála and Local Authorities, as appropriate”. The Council supports in principle the provision of a small pier/jetty at Shankill Beach and to promote its use as a health and well being amenity for water based and recreational purposes. Proposals for such development shall be accompanied by Screening for AA and, as necessary, an AA Natura Impact Statement and EIAR Screening and Environmental Assessments as appropriate. A general scheme of the Bill was approved by the Government in December 2019. The role of the Local Authority in this respect will crystallise as the legislation is finalised.</i></p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
			<p>To:</p> <p><i>8.5.1 Policy Objective GIB7: National Marine Planning Framework (NMPF) It is a Policy Objective to support the policies and objectives as appropriate and relevant of the <del>forthcoming</del> National Marine Planning Framework (NMPF), with respect to the conservation, management, and protection for a sustainable future for the marine area.</i></p> <p><i>The <del>Government have produced a consultation draft</del> NMPF (2021), which sets out a vision, objectives, and policies to aid <del>draft</del> decision making in the marine area. It is an important component piece of progressing <del>requirements towards the adoption of a National Marine Plan, which is required under EU Directive 2014/89/EU. <u>to be in place by 2021.</u></del> Part V of the Planning and Development (Amendment) Act 2018 transposes the Directive into primary legislation. It is important to note that Section 68 states that Part V, “shall not apply to those parts of the nearshore areas to which a Development Plan, a Local Area Plan, the NPF, a RSES, a guidance on a directive under Part 11 of the principle Act applies”. The <del>draft</del> NMPF also references the Marine Planning and Development Management Bill, which introduces a “single development management process for the maritime area for activities and development to be administrated by An Bord Pleanála and Local Authorities, as appropriate”. The Council supports in principle the provision of a small pier/jetty at Shankill Beach and to promote its use as a health and wellbeing amenity for water based and recreational purposes. Proposals for such development shall be accompanied by Screening for AA and, as necessary, an AA Natura Impact Statement and EIAR Screening and Environmental Assessments as appropriate. A general scheme of the Bill was approved by the Government in December 2019. The role of the Local Authority in this respect will crystallise as the legislation is finalised.</i></p> <p>Amend Appendix 13 as follows</p> <p>Add</p> <p><i><u>National Marine Planning Framework (NMPF) (2021)</u></i>  <i><u>The National Marine Planning Framework represents a comprehensive and integrated system for planning, protecting and managing Ireland’s extensive marine area, coastal areas, ports and harbours.</u></i></p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<p>iv) Angling contributes to tourism and also provides employment in the form of charter boats, tackle shops, guides and instructors. The County Development Plan should provide for close co-operation with IFI in relation to development, promotion and marketing of the angling product in the County.</p>	<b>B0131</b>		<p>The Executive notes the issue raised.</p> <p>Policy Objective E17: Maritime Economy provides strategic level support for the sustainable development of the maritime economy. As stated in Section 6.4.2.16 the County's marine environment is an asset that yields both commercial and non-commercial benefits in terms of seafood, tourism, recreation, cultural heritage, and biodiversity. It is considered that angling, as a component part of the maritime economy, is appropriately supported at a strategic level under Policy Objective E17.</p> <p>With respect to co-operation between the Council and the IFI with regard to the promotion of angling as a tourism product, reference is made to Policy Objective E16: Tourism and Recreation which states that is a Policy Objective to co-operate with the appropriate agencies in promoting sustainable tourism and securing the development of tourist and recreation orientated facilities in the County.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<b>3.6.2.10 Policy Objective E19: Low Carbon Economy</b>			
<p>i) Questions whether the Climate Action and Low Carbon Development (Amendment) Bill 2021 will any impact on Policy Objective E19: Low Carbon Economy.</p>	<b>B0942</b>		<p>The Executive notes the issue raised.</p> <p>There remains a number of legislative stages before the Climate Action and Low Carbon Development (Amendment) Bill 2021 is signed into law. It remains to be seen with certainty how the future legislation may impact upon Policy Objective E19: Low Carbon Economy.</p> <p><b>Recommendation</b> No change to Draft Plan</p>

### 3.7: Chapter 7 - Towns, Villages and Retail Development

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<b>3.7.1: General</b>			
<p>i) Submission suggested a new subsection in Chapter 7, Tourist-based developments with a new Policy Objective as follows:</p> <p>“Direct tourist-based developments, where appropriate, into existing settlements where there is adequate infrastructure to service activity” (taken from Kildare Plan).</p>	<b><u>B0594</u></b>		<p>The Executive notes the issues raised in this comprehensive submission.</p> <p>Section 6.4.2.15 Policy Objective E16: Tourism and Recreation states that it is a policy Objective of the Council to co-operate with the appropriate agencies in promoting sustainable tourism and securing the development of tourist and recreation orientated facilities in the County. The objective also notes that the Council will promote the implementation of the Dún Laoghaire-Rathdown Tourism Strategy Marketing Plan 2017–2022, and any subsequent update of same.</p> <p>The ‘Dún Laoghaire-Rathdown Tourism Strategy Marketing Plan 2017–2022’ is the Council’s detailed strategy for the development of the County’s tourism product, setting out a clear vision and key objectives to drive tourism development.</p> <p>Therefore, it is considered that tourist-based development is adequately covered in Chapter 6 of the Draft Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.7.2: Section 7.2 Multifunctional Centres in Dún Laoghaire-Rathdown</b>			
<b>3.7.2.1: Section 7.2.2 Recent Trend Towards Multifunctional Centres</b>			
<p>ii) Submissions welcome policy direction that recognises experiential retail and it accurately characterises the structural shift in the retail sector.</p>	<b><u>B0981</u></b> <b><u>B1072</u></b>		<p>The Executive notes and welcomes the support provided.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submission requests that Section 7.2.2 should clarify that the Planning Authority will adopt a presumption in favour of change of use applications within retail areas of the County.</p>	<b><u>B0981</u></b>		<p>The Executive notes the issue raised.</p> <p>The County Development Plan cannot favour any specific proposal in a planning application. Every planning application is considered under its own merit.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>iv) Population increases forecast in DLR. County Development Plan should accommodate growth in the County, by not only providing supportive policies and objectives to provide for residential and employment lands, but also the supporting infrastructure and services such as education, commercial, and retail, specifically scale-appropriate new convenience retail floorspace at suitable locations across its administrative area.</p> <p>New residential growth areas should be adequately served by retail facilities and as such, it is requested that the DLRCC provide flexibility with regard to zoning policies in order to facilitate the provision of scale-appropriate retail floorspace at appropriate locations.</p> <p>The growth of convenience and ancillary retail facilities should be accommodated at appropriate locations, across the County at the periphery of the core retail areas, regeneration areas and new residential development.</p>	<b>B1022</b>		<p>No change to Draft Plan.</p> <p>The Executive notes the issue raised.</p> <p>Policy Objective MFC1: Multifunctional Centres states <i>"It is a Policy Objective of the Council to embrace and support the development of the County's Major Town Centres, District Centres and Neighbourhood Centres as multifunctional centres which provide a variety of uses that meet the needs of the community they serve."</i> Furthermore, Policy Objective RET1: Retail Planning Guidelines states that the Council will have regard for the Retail Planning Guidelines in determining planning applications for retail development, and the Guidelines support a sequential development approach and plan led development approach with regards to retail.</p> <p>The 'MTC', 'DC' and 'NC' zoning objectives allow for a variety of land uses which offers a degree of flexibility.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.7.2.2: Policy Objective MFC3: Placemaking in our Towns and Villages</b>			
<p>i) Formulate and deliver a policy in accordance with the Programme for Government's Town Centre First Policy for the designated key towns and villages and include Collaborative Town Centre Health Check Programme and establish sustainable key indicators for monitoring on a regular basis.</p> <p>Embrace the key tenets of the Programme for Government (PFG), which was published in June</p>	<b>B0929</b>		<p>The Executive notes the issue raised.</p> <p>The Programme for Government is committed to a Town Centre First policy approach which is founded on the Town Centre Health Check research, to ensure that cities and towns become vibrant places for living and working in by removing the underused and vacant urban building stock.</p> <p>Policy objective MFC3: Placemaking in our Towns and Villages of the Draft Plan states the following:</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>2020, including the need for a national policy focusing on Town Centres First, the enhancement of the built heritage in urban villages, and the reuse and repurposing of vacant buildings in historic town centres.</p>			<p><i>"It is a Policy Objective of the Council to support proposals for development in towns and villages that provide for a framework for renewal where relevant and ensure the creation of a high quality public realm and sense of place. Proposals should also enhance the unique character of the County's Main streets where relevant."</i></p> <p>Furthermore, a vacant site levy was established under the Urban Regeneration and Housing Act 2015. This levy is a site activation measure, to ensure that vacant land in urban areas is brought into beneficial use.</p> <p>The <i>Collaborative Town Centre Health Check / Historic Town Initiative</i> is addressed in the forthcoming Heritage Plan which includes an aim to <i>"enable communities to access heritage in compact and connected places"</i> and where action 4.3.1 of the Draft Heritage Plan 2021 - 2025 is to <i>"Identify suitable towns and villages for collaborative approaches to historic built environment conservation such as the Collaborative Town Centre Health Check / Historic Town Initiative"</i> and also to <i>"proactively identify opportunities for adaptive reuse of existing structures."</i></p> <p>In formulating this response, the Executive have in accordance with section 12 (8) (b) (iii) of the Planning and Development Act, 2000, (as amended) taken account of the strategic direction received from the members at pre-draft stage <i>"To request the Chief Executive ensures that the plan recognises the unique character of our towns and villages"</i></p> <p><b>Recommendation</b> Amend Policy Objective MFC3 'Placemaking in our Towns and Villages (p. 139) to include the new text after paragraph 2:</p> <p><i>"As set out in the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Region (EMRA), this focus on 'placemaking' is closely linked to the concepts of vitality and viability which are described as central to maintaining and enhancing town centres.</i></p> <p><u><i>The County Development Plan also supports the introduction of the Town Centre First policy approach, where appropriate, which will ensure that the vibrancy of towns will be enhanced"</i></u></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<b>3.7.3: Section 7.5 Overall Strategy for Centres Identified in the Retail Hierarchy</b>			
<b>3.7.3.1: Table 7.2 Summary of Overall Strategy for Centres in the DLR Retail Hierarchy</b>			
<p>i) New Neighbourhood Centres - Ticknock is referred to as a New Neighbourhood Centre in Table 7.2, whereas the neighbourhood centre in question is an established neighbourhood centre and is known as 'Blackglen' neighbourhood centre.</p>	<b><u>B0026</u></b>	5	<p>The Executive agrees with the issue raised.</p> <p><b>Recommendation</b> Amend Table 7.2 under Section 7.5.1 on page 143.</p> <p>Add "<u>Blackglen</u>" to Established Neighbourhood Centres.</p> <p>Delete "<u>Ticknock</u>" from New Neighbourhood Centres.</p>
<p>ii) Sandyford Business District is not listed in the retail hierarchy of the County and is therefore considered by the plan to be operating at the neighbourhood centre level only. This is inconsistent with the existence of a significant quantity of retail development and constrains the expansion of the existing retail units in Beacon South Quarter.</p> <p>Request that Sandyford mixed use district be designated at an intermediate level above level 4 neighbourhood and below level 3 district and that table 7.1 be amended accordingly.</p>	<b><u>B0882</u></b> <b><u>B0919</u></b>		<p>The Executive has considered the issue raised.</p> <p>Sandyford displays a wide range of retail development including comparison goods, convenience goods and service sectors. The overall distribution of retail activity is concentrated in the MIC and MOC zone with a concentration of neighbourhood centre type facilities at Beacon South and also closer to the Luas line. There are also some retail warehousing uses in the LIW zone with ancillary retail development is also located in the Carmanhall Road area. Within Central Park, retailing is primarily located along the pedestrian street and the pedestrian route to the Luas. There is no significant retail in South County Business Park. Retailing within the LIW zone is almost exclusively retail warehousing and car showrooms.</p> <p>The Sandyford Business District is not identified as a Major Town Centre or District Centre in the Retail Strategy for the Greater Dublin Area 2008-2016 (RSGDA). The RSGDA requires updating, and this is acknowledged in Policy Objective RET2 of the Draft Plan which states "It is a Policy Objective of the Council to support the preparation of a Retail Strategy for the Greater Dublin Area in accordance with the Retail Planning Guidelines for Planning Authorities 2012, or any subsequent update so as to, where necessary, update the retail hierarchy and apply floorspace requirements. In the interim, it is a Policy Objective to have regard to the existing Retail Strategy for the Greater Dublin Area 2008 – 2016 but to adopt a cautionary approach due to the fact that it now requires to be updated." Bearing in mind both the changing face of the overall retail sector and the fact the existing retail strategy is now due for</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>an update, DLR County Council have adopted a cautionary approach to retailing and retailing floorspace and will continue to do thus ensuring that it accords with the retail hierarchy.</p> <p>The RSGDA has identified five levels within the retail hierarchy which are listed in Table 7.1 of the Draft Plan. These are Metropolitan Area (Level1), Major Town Centres (Level 2), Town and District Centres (Level 3), Neighbourhood Centres, Local Centres, Small Towns and Villages (Level 4), and Corner Shops, Small Villages (Level 5). It is not appropriate to create an intermediate level outside of these listed.</p> <p>The Sandyford Urban Framework Plan (SUFP) was adopted in 2011 and is included in the Draft Plan as Appendix 17. Section 2.4.2 (d) Retail – Convenience and comparison (not retail warehousing) states:  <i>“It is critical that retail in Sandyford is not of a scale that undermines the retail hierarchy of the overarching County Development Plan. Future convenience and comparison retailing (not including retail warehouses) should be of a limited scale so as not to attract ‘retail only’ journeys into the area in order to avoid competing with established District Centres and/or Major Town Centres elsewhere in the County. Future retail should be of a scale appropriate in a Neighbourhood Centre.”</i></p> <p>The Draft SUFP is very clear that retail in Sandyford should not be of a scale that undermines the wider retail hierarchy of the County and that future retailing should be of a limited scale so as not to attract ‘retail only’ journeys into the area.</p> <p>In any consideration of appropriate ‘retail scale’ for Sandyford regard has to be had to the close proximity of the Business District to both the Major Town Centre at Dundrum and the long-established District Centre at Stillorgan. Dundrum, directly linked to Sandyford Business District by Luas, is circa 1.1 kms from the Business District. Likewise, Stillorgan District Centre lies circa 1.3 kms from the Business District. In this context the position adopted by the Draft SUFP in relation to retailing in Sandyford – i.e. serving primarily a local workforce/population – is considered to be robust and objective.</p> <p><b>Recommendation</b>                      No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
iii) Submission provides commentary on the position of Cornelscourt as a district centre and considers that Table 7.2 provides negligible detail about the role of Cornelscourt District Centre.	<b>B0078</b>	7	<p>The Executive notes the issue raised.</p> <p>Table 7.2 is a summary of the overall strategy for centres in the DLR retail hierarchy. In respect to Cornelscourt, the table states that the overall strategy for the development of Cornelscourt is that there will be <i>“limited expansion of retail floorspace on a constrained site.”</i> The strategy does not discuss the role of the different district centres, including Cornelscourt, which is considered appropriate as the table is concerned with the strategy in relation to the retail hierarchy only.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
iv) Table 7.2 Blackrock. Amend section to state:  “To support the ongoing redevelopment of <del>the</del> Blackrock Shopping Centre and <u>the provision of additional residential development at the rejuvenated</u> Frascati Shopping Centres <del>and</del> , along with the consolidation of Blackrock Main Street as a mixed-use centre in accordance with an approved Local Area Plan. Any retail expansion should be limited and proportionate to the current percentage share of the overall net retail floorspace in the core retail area, as indicated in the Local Area Plan”.	<b>B1041</b>	2	<p>The Executive notes the issue raised.</p> <p>The Frascati shopping centre site is zoned ‘DC’ of which residential use is ‘Permitted in Principle’. Any additional residential provision at this location shall be dealt with as part of a planning application, and in accordance with the Blackrock Local Area Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
v) Request amendment to Table 7.2 – Dundrum – Refer to ‘Residential’ uses to be consistent with Section 7.5.2.1 Policy Objective RET4 : Major Town Centres, which refers to residential uses.	<b>B1072</b>	1,5	<p>The Executive notes the issue raised.</p> <p>Table 7.2 states that the overall retail strategy for Dundrum is <i>“Old shopping centre and adjoining lands – to include appropriate level of complementary non-retail uses and activities in respect to community, cultural and civic uses. Public realm upgrade of Main Street.”</i></p> <p>Policy Objective RET4: Major Town Centres states: <i>“It is a Policy Objective of the Council to maintain the two Major Town Centres – Dún Laoghaire and Dundrum – as the primary retail centres in the County and to support their evolving multifunctional role. The vitality of the towns will be enhanced by their mixed-use nature. In addition to retail, these centres must</i></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p><i>include community, cultural, civic, leisure, restaurants, bars and cafes, entertainment, employment and residential uses. Development shall be designed so as to enhance the creation of a sense of place."</i></p> <p>Table 7.2 refers to the overall retail strategy for Dundrum, which also recognises the trend towards multifunctional centres and the rise in 'experiential' retail with a shift from a town centre dominated by comparison retail offer to one where more time is spent on 'experiences' such as leisure, culture, food, beverages and retail services. This tables focus is on the overall retail strategy.</p> <p>However, Policy Objective RET4 Major Town Centre is all encompassing of the uses to be included in a major town centre, which includes residential. It is considered that Policy Objective RET4, and the land use zoning 'MTC' that applies to Dundrum shopping centre in which 'residential' is 'Permitted in Principle' adequately addresses the suitability of Dundrum for residential use.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>vi) Submission provides positive commentary on Table 7.2 and considers that the development of the district centres will be invaluable. DLRCC should also make sure there are spaces designated for local markets.</p>	<b>B0587</b>		<p>The Executive welcomes the support provided, and notes the issue raised.</p> <p>Policy Objective RET9: Casual Trading Areas states: <i>"It is a Policy Objective of the Council to designate sites as Casual Trading Areas in suitable locations where deemed appropriate."</i> It is also Council policy to promote organic producers and producer-only products through the provision of its 'CoCo Markets' and to promote seasonal and craft markets, including privately operated farmers markets.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.7.3.2: Policy Objective RET4: Major Town Centres</b>			
<p>i) Submission considers that the pandemic has had a significant effect on the retail sector and a moratorium of perhaps 10 years should be placed on additional retail development in Dún Laoghaire.</p>	<b>B0141</b>	3	<p>The Executive notes the issue raised.</p> <p>The Covid-19 pandemic has had a significant effect on a range of sectors, not least the retail and entertainment sectors. Indeed, the retail sector in particular was undergoing substantial change prior to the pandemic due to online shopping and a change in consumer habits,</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>changes which have been reflected in the Draft Plan under Section 7.2.2 <i>Recent Trends Towards Multifunctional Centres</i>. However, it seems clear that the pandemic has accelerated the trends that were already in evidence. As such, it is considered appropriate to incorporate a new strategy and policy into the plan reflecting same. It is not considered that any rational argument has been put forward to place a moratorium on additional retail development.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>ii) The Plan should be flexible, considered, and adaptable in its approach to town centres as the change in the retail sector emerges and stabilises over the next few years.</p> <p>Town centres, both historic and new, need to be planned and carefully managed in accordance with place-making principles, ensuring a high-quality public realm to encourage people to visit, stay, and shop, but also to encourage over the shop living and increased residential uses within town centres.</p>	<b><u>B1047</u></b>		<p>The Executive notes the issue raised.</p> <p>Major Town Centre (MTC) zoning has been designed to allow for a wide range of complementary uses and facilitates both appropriate commercial and residential development. Each planning application for new development/new uses is carefully considered through the development management process on case-by-case basis.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) There is a need to revitalise and grow Dún Laoghaire and Dundrum, as living towns and hubs for the County. Recommends a post Covid retail strategy.</p>	<b><u>B0840</u></b>		<p>The Executive notes the issue raised.</p> <p>Dún Laoghaire and Dundrum are designated as Major Town Centres within the County, and there are Specific Local Objectives to prepare a Local Area Plan for both Dún Laoghaire (SLO33) and for Dundrum (SLO6) which will offer opportunities to improve the viability and vitality of the town centres. Appendix 8 of the Draft Plan also contains the Interim Dún Laoghaire Urban Framework Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Dún Laoghaire – Assignment of shop type to quarter is more restrictive than encouraging.</p>	<b><u>B1206</u></b>		<p>The Executive notes the issue raised but does not agree.</p> <p>Dún Laoghaire is the County Town of DLR and the profile of commercial development is of a smaller, more specialist retail scale, complemented by pop up retail activities such as the</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>weekend and Christmas markets and supported by a range of recreation, wellbeing, tourism, heritage, employment, health, culture and education uses.</p> <p>Given the elongated linear nature of the Dún Laoghaire Major Town Centre Zoning, which extends from Cumberland Street to the People's Park, it is considered appropriate to divide the town into quarters with the principal Town Centre quarter running along George's Street (from Bloomfields Shopping Centre to Corrig Avenue) the northern part of Patrick Street and the central part of Marine Road. This principal quarter constitutes the commercial and retail heart of the Town and it is a Policy Objective to consolidate and strengthen this core area. The Council will also encourage the incremental growth of secondary character 'quarters' in the Town Centre into three different quarters. The normal range of Major Town Centre uses and functions will still be acceptable in the secondary quarters and the emphasis will be to encourage and promote retail uses and activities appropriate to the quarter. The division into quarters does not restrict the uses which may be allowed.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.7.3.3: Dundrum Main Street</b>			
<p>i) Submission supports the public realm improvements and development criteria for Dundrum Main Street set out in the Plan and suggests that these are incorporated into the Local Area Plan for Dundrum.</p>	<b><u>B1158</u></b>	1	<p>The Executive notes the issue raised. A Local Area Plan (LAP) for Dundrum is currently being prepared and the draft Local Area Plan will be placed on public display following adoption of the County Development Plan. LAPs are required to be consistent with the County Development Plan and as such, the content of the County Development Plan will be incorporated.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.7.3.4: Waldemar Terrace/William Dargan Bridge</b>			
<p>i) The draft County Development Plan (p147) refers to the need for comprehensive redevelopment of the William Dargan Bridge Undercroft, Usher House and Waldemar Terrace. The future of this important</p>	<b><u>B0271</u></b>	1	<p>The Executive notes the issue raised.</p> <p>An Area Based Transport Assessment (ABTA) is currently being prepared for Dundrum. The study is co-funded by the NTA and DLRCC and a key component of this study will be to examine the future of the bus interchange at Waldemar Terrace, in the context of the NTA's</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
gateway to the Village should be clarified in advance of the publication of the County Development Plan.			<p>BusConnects proposals. This work will feed into the preparation of the Dundrum LAP, a draft of which will be placed on public display following the adoption of the County Development Plan. While the importance of this gateway into Dundrum is acknowledged, it is not proposed to define the parameters for the redevelopment of the William Dargan Bridge undercroft until such time as the future design of the bus interchange is clarified through the ABTA process.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) The Waldemar Terrace lands are part of the DRLP ownership and may be considered separate to the main Phase 2 site. The following change is sought in this regard (bold is a proposed addition):</p> <p>iii) The comprehensive redevelopment of the environs of the William Dargan Bridge undercroft, Usher House and Waldemar Terrace. This area provides a significant opportunity <b>for a new community, cultural and civic hub and</b> to create a new focal point and sense of enclosure at the northern 'gateway' to Dundrum Main Street. At present this area is dominated by heavy vehicular traffic volumes and the bus interchange.</p>	<b>B1072</b>	1	<p>The Executive notes the issue raised.</p> <p>The submitters point that the Waldemar Terrace lands can be considered separate to the main Dundrum phase 2 site is noted, however, the suggestion that Section 7.5.2 should be amended in the manner sought is not supported. The effect of the change would be to direct the proposed community, cultural and civic hub (CCCH), which has been awarded €4 million in funding through URDF, to the submitter's lands at Waldemar Terrace. This would be premature pending a detailed site selection process, which has yet to be completed.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.7.3.4: Dundrum – MTC Zoning</b>			
<p>i) Dundrum is covered by the MTC zoning in the draft County Development Plan, however, there is no clear definition or description of the boundaries of the MTC. In Chapter 7 (7.4.2) Core Shopping Areas, the core shopping area for Dundrum 'corresponds to the MTC Zoning objective for the Town and includes the area between Main Street and Dundrum Bypass and from Waldemar Terrace to Wyckham Way'. However, in Map 1, the MTC Zoning appears as going farther north than Waldemar Terrace. It is proposed that the</p>	<b>B0271</b>	1,5	<p>The Executive notes the issue raised.</p> <p>The Draft Plan acknowledges the requirements of the Retail Planning Guidelines to define and map Core Shopping Areas for city, town and district centres. In each of these cases throughout the County, the Core Shopping Area is defined as being either the 'MTC' or 'DC' zoning, or the 'Town Centre' land use objective in the case of Cherrywood. It is therefore proposed to amend the wording of Section 7.4.2 to clarify that the Core Shopping Area extends beyond Waldemar Terrace. It is also proposed to delete the reference to 'the town' to avoid any confusion with regard to Dundrum's status as an MTC.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
boundaries of the Dundrum MTC are clearly described in the County Development Plan as well as shown on a map.			<p><b>Amend Section 7.4.2 Core Shopping Areas as follows:</b></p> <p><b>From:</b>  <i>"The core shopping area for Dundrum corresponds to the MTC Zoning objective for the Town and includes the area between Main Street and Dundrum Bypass and from Waldemar Terrace to Wyckham Way".</i></p> <p><b>To:</b>  <i>"The core shopping area for Dundrum corresponds to the MTC zoning objective <del>for the Town</del> and <u>generally</u> includes the area between Main Street and Dundrum Bypass and from <u>Uncle Tom's Cabin</u> to Wyckham Way".</i></p>
ii) Submission requests that references to Dundrum MTC is clarified / amended and that it is explicitly states that the Central Mental Hospital is not within the MTC zoning objective.	<b>B0529</b>	1	<p>The Executive notes the issue raised.</p> <p>The zoning of land throughout the County is defined on the development plan maps, from which it is clear that the Central Mental Hospital site is zoned Objective A – <i>To provide residential development and/or protect and improve residential amenity</i>. It is not considered that any confusion could arise in this regard through the planning process and consequently, no change to the Draft Plan is recommended.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.7.3.5: Dundrum – Transportation and Movement</b>			
i) Dundrum cannot sustain two-way traffic or significant bus traffic on Main Street and there is concern at the equivocal position in the draft County Development Plan (page 148), which states that <i>'future bus routes in the area should be considered in the context of the traffic volumes on Dundrum Main Street and the potential to increase the utilisation of the Dundrum Bypass in this regard'</i> . It is proposed that the text on page 148 be amended to read (proposed additional text is underlined) <i>'future bus routes in the area should be considered in the context of the traffic <u>capacity</u> on Dundrum</i>	<b>B0271</b>	1	<p>The Executive notes the issue raised.</p> <p>The change sought by the submitter with regard to the draft County Development Plan is to substitute the term traffic 'capacity' for the existing wording, which refers to traffic 'volumes' on Main Street. In this situation, it is considered that the term 'volume' refers to the quantity of traffic on Main Street, whereas 'capacity' relates to the ultimate throughput of vehicles of which the street is capable. The purpose of this provision in the Draft Plan is to ensure that the potential impact on Main Street of additional traffic is taken into account in the planning of any future bus routes in the area. A part of this assessment would be a consideration of Main Street's ability to handle additional traffic in terms of overall traffic capacity, however, it is also considered that the balance of the objectives set out in the Draft Plan, for example, to make Main Street a more pedestrian friendly and traffic calmed environment, should be a</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p><i>Main Street and the potential to increase the utilisation of the Dundrum Bypass in this regard.'</i></p>			<p>determining factor. It is therefore considered that the volume of traffic on Main Street could make it undesirable to include additional traffic (bus or otherwise) long before the road reached its ultimate traffic capacity, as the appropriate volume of traffic for a pedestrian friendly, traffic calmed street might be significantly lower than the street's ultimate capacity. It is therefore not considered desirable to change the wording of the Draft Plan, given that the objectives for Main Street revolve around creating a people friendly environment, rather than around the street's ultimate traffic capacity.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission requests that a sentence relating to additional vehicular links in Policy Objective RET4, Chapter 7, is omitted as there is no requirement to add additional vehicular links to the Central Mental Hospital site.</p>	<p><b>B0529</b></p>	<p>1</p>	<p>The Executive notes the issue raised.</p> <p>Policy Objective RET 4: <i>Major Town Centres</i> states as follows in this regard:</p> <p><i>The requirement that new development, and in particular substantial residential schemes, should be integrated with and link effectively to the surrounding locality and wider mobility network, in terms of pedestrian, cyclist and vehicular movements. In the case of the redevelopment of the Central Mental Hospital site, this will likely necessitate the provision of additional vehicular links to the existing road network as well as integration into the surrounding pedestrian and cycle networks.</i></p> <p>While the Draft Plan refers to the 'likely' necessity of additional vehicular links, the actual requirement for additional vehicular links will be assessed through the detailed development management process. It is also noted that an Area Based Transport Assessment is currently being prepared for Dundrum, which will provide an additional source of information in this regard. However, it is proposed to update the Draft Plan to reflect the fact that this work is yet to be undertaken and to ensure that the aforementioned processes are not to pre-empted by the Draft Plan.</p> <p><b>Recommendation</b> Amend bullet 17 (p.148) under 'Dundrum' in RET4 'Major Town Centres' of the Draft Plan from:</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><i>“The requirement that new development, and in particular substantial residential schemes, should be integrated with and link effectively to the surrounding locality and wider mobility network, in terms of pedestrian, cyclist and vehicular movements. In the case of the redevelopment of the Central Mental Hospital site, this will likely necessitate the provision of additional vehicular links to the existing road network as well as integration into the surrounding pedestrian and cycle networks”.</i></p> <p>To:</p> <p><i>“The requirement that new development, and in particular substantial residential schemes, should be integrated with and link effectively to the surrounding locality and wider mobility network, in terms of pedestrian, cyclist and vehicular movements. In the case of the redevelopment of the Central Mental Hospital site, this <del>will likely</del> may necessitate the provision of additional vehicular links to the existing road network as well as integration into the surrounding pedestrian and cycle networks”.</i></p>
<p>iii) Broadly welcomes the Bus Connects proposals to deliver three orbital core bus corridors. However, the creation of a new interchange hub at Dundrum, requires consultation regarding the impact on DRLP lands and to ensure that the future development of the lands is integrated with the new hub facility. Suggest that a key aspect to the development of the interchange concept at Dundrum should be improvements to the pedestrian linkage between the Dundrum Luas station and Main Street.</p>	<p><b>B1072</b></p>	<p>1,5</p>	<p>The Executive notes the issue raised.</p> <p><b>This is not a County Development Plan issue but relates to the preparation of the Dundrum Local Area Plan.</b></p> <p>An Area Based Transport Assessment (ABTA) is currently being prepared for Dundrum. The study is co-funded by the NTA and DLRC and a key component of this study will be to examine the future of the bus interchange at Waldemar Terrace, in the context of the NTA’s BusConnects proposals. The Council will engage with stakeholders in the preparation of the ABTA.</p> <p>The recommendations from the ABTA will feed into the Dundrum LAP, the preparation of which is an objective of both the current and the Draft Plan. The ABTA, along with the Dundrum Community, Cultural and Civic Action Plan, which was completed in 2020, form the key inputs for the LAP. It is anticipated that the draft Dundrum LAP will be placed on public display shortly after the adoption of the County Development Plan in 2022.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>iv) Seeking an amendment to the parking objective (page 148), which is based on a retail/commercial scheme at the Dundrum 'Phase 2' site. The objective should be amended as follows (strikethrough are proposed deletions):</p> <p>The planned provision of <del>significant additional</del> off-street <del>and underground</del> car parking provision with appropriate access routes (both surface and sub-surface). This will help minimise vehicle movements and facilitate the complete removal of surface parking from the Main Street, immediately connected streets and surrounding residential areas.</p>	<b>B1072</b>	1	<p>The Executive notes the issue raised.</p> <p>The change sought by the submitter seeks the deletion of references to 'significant additional' off-street parking as well as the reference to underground parking. The change is sought on the basis that the provisions relate to the quantum of off-street/underground car parking anticipated in the previous Dundrum phase 2 permission, which was led by retail/commercial uses, whereas the applicant has stated elsewhere in their submission that this is now anticipated to be a 'residential led' development, which would result in a lower level of off street car parking. This is a development management matter. It is accepted that the Plan needs to ensure that car parking relates to proposed uses.</p> <p><b>Recommendation</b> Amend Section 7.5.2 Major Town Centre (p 148) from:</p> <p><i>"The planned provision of significant additional off-street and underground car parking provision with appropriate access routes (both surface and sub-surface). This will help minimise vehicle movements and facilitate the complete removal of surface parking from the Main Street, immediately connected streets and surrounding residential areas."</i></p> <p>To:</p> <p><i>"The <del>planned-provision of significant additional</del> off-street and underground car parking <del>provision</del> commensurate with the uses proposed, with appropriate access routes (both surface and sub-surface). This will help minimise vehicle movements and facilitate a reduction in/the complete removal of surface parking from the Main Street, immediately connected streets and surrounding residential areas."</i></p>
<p>v) Propose a new walkway system for Dundrum. The village requires walkways from the Kiosk entrance to the town Centre, through the Crossroads (with pedestrian right of way) past the Church down to the Luas Station.</p> <p>Where the current entrance is to the Car park [old shopping centre], there needs to be another</p>	<b>B0437</b>	1	<p>The Executive note the issue raised.</p> <p>This issue is addressed in Section 7.5.2 of the Draft Plan which states as follows:</p> <p><i>The development of a comprehensive pedestrian walkway network connecting and linking key destinations - including the Dundrum Town Centre (Shopping Centre), the Dundrum and Ballaly Luas stops, Main Street/Sandyford Road, Sweetmount Park and a series of internal Town Squares. There is a recognition that the construction of the Dundrum and Wyckham Bypasses</i></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>walkway of about 20 feet in width, heading west towards where Matt Britton's is at present, and then turning left or heading south to a walkway at the back of the Church.</p> <p>The walkways should be very comfortable to walk on with plenty of seating, with planting and green areas.</p>			<p><i>inevitably creates a degree of severance – both physical and perceived – between Dundrum Major Town Centre and its, generally, residential hinterland. The proposed footpath network should, therefore, seek to mitigate this severance using a variety of mechanisms including pedestrian bridges at key locations, pedestrian priority-controlled junctions and other mechanisms.</i></p> <p>The issue will be further explored through the Dundrum Area Based Transport Assessment (ABTA) and Dundrum LAP, however, it is considered that the above provision provides sufficient policy context/support at County Development Plan level.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>vi) Changing Main Street to single lane traffic with bicycle lanes has already increased footfall and built community spirit, as well as reducing emissions. Continuing the single lane traffic from the Luas bridge all the way down to the Milltown bridge along the lower Dundrum Road would further reduce emissions and would also improve safety as the road is too narrow to accommodate current levels of traffic.</p>	<b>B0624</b>	1	<p>The Executive notes the issue raised.</p> <p>The submitter's support for the current one-way system on Main Street is noted as are the comments regarding its extension. An Area Based Transport Assessment (ABTA) is currently being prepared for Dundrum and will consider a wide range of different options including the operation of the one-way system. It is not proposed to include additional objectives in the County Development Plan in advance of the finalisation of this study, however, the recommendations of the ABTA will feed into the preparation of the Dundrum LAP.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.7.3.6: Dundrum – Heritage and Conservation</b>			
<p>i) Request the addition of the following:</p> <p><i>To promote the sensitive adaptation and redevelopment of Mahers Terrace to open up the courtyard and rear buildings for attractive and viable town centre uses.</i></p>	<b>B1072</b>	1	<p>The Executive notes the issue raised.</p> <p>Maher's Terrace is located within the Candidate Architectural Conservation Area, which is centred around Dundrum Crossroads and also includes holy Cross Church. The amendment sought by the submitter seeks a statement of support for the adaptation and redevelopment of Maher's Terrace to open up the courtyard and rear buildings, for 'attractive and viable' town centre uses.</p> <p>The sensitive adaptation and redevelopment of Ashford Terrace, which is also located within the same candidate ACA is noted and similarly high quality and appropriate redevelopment</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>and adaptation of Maher's Terrace would be welcome. It is accepted that the courtyard and rear buildings are currently underutilised and could make a greater contribution to the area.</p> <p>However, the reference to 'attractive and viable town centre uses' is considered superfluous as these uses are implied under the MTC zoning objective. It is also considered that the term 'reuse' is more appropriate than 'redevelopment'.</p> <p><b>Recommendation</b> Amend Section 7.5.2 Major Town Centres (p. 147) to include the following additional bullet point:</p> <p><i><u>"Promote the sensitive adaptation and reuse of Mahers Terrace to open up the courtyard and rear buildings"</u></i>.</p>
<p>ii) The County Development Plan should recognise and respect the old vernacular character and streetscape of the old Main Street and maintain and incorporate where possible the existing buildings and/or facades in the new development. Furthermore, the design of any new building should sensitively blend in with the older surroundings.</p>	<b><u>B1124</u></b>	1	<p>The Executive notes the issue raised.</p> <p>In terms of planning tools available to protect the heritage and atmosphere of a given place, the designation of that place as an architectural conservation area (ACA) is considered the most appropriate. In addition to the existing ACA around Pembroke Cottages and the candidate ACA around Dundrum Cross, the Draft Plan also includes a new proposed ACA covering the northern end of Main Street. An ACA provides an additional level of protection to the streetscape, particularly with regard to the external appearance of structures and features and seeks to facilitate and to guide sensitive, good quality development, which will enhance both the historical character of the area and the amenity of those who enjoy it.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) In any future development of Dundrum, the Council should continue to improve on the old village atmosphere and sense of community while not compromising on density.</p>	<b><u>B1124</u></b>	1	<p>The Executive notes the issue raised.</p> <p>In terms of planning tools available to protect the heritage and atmosphere of a given place, the designation of that place as an architectural conservation area (ACA) is considered the most appropriate. In addition to the existing ACA around Pembroke Cottages and the candidate ACA around Dundrum Cross, the Draft Plan also includes a new proposed ACA covering the northern end of Main Street. It is considered that the subsequent progression of the candidate and proposed ACA areas to full ACA status, combined with the preparation of</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>the Dundrum LAP, which will provide additional opportunities for the protect and promotion of Dundrum's heritage, atmosphere and unique sense of place, should adequately address this issue.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.7.3.7: Dundrum – Residential Uses</b>			
<p>i) Additional residential uses including Living Over the Shop are envisaged for Dundrum MTC (p147). The option of Living Over the Shop as a new design form, and not only a re-use, should be provided for in this Chapter, and in Chapter 12 Development Management (12.3.8.9), in relation to Dundrum redevelopment, as well as more widely.</p>	<b><u>B0271</u></b>	1,5	<p>The Executive notes the issue raised.</p> <p>The ability for an applicant to propose residential uses above commercial uses at ground or lower floors is a well-established form of development and is anticipated and facilitated by policies in the Draft Plan around mixed use. The policies and objectives in the Draft Plan regarding living over the shop (Section 7.5.2: <i>Major Town Centres</i>; Section 12.3.8.9 <i>'Living-Over-The-Shop'</i>), either with regard to Dundrum or more generally, in no way limit that form of development to the reuse of existing buildings.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) The following change is sought to reflect the residential-led approach to development on the Dundrum 'Phase 2' lands (bold is a proposed addition, strikethrough a proposed deletion):<i>The need to ensure an appropriate balance of retail and non-retail uses is achieved in Dundrum Major Town Centre, taking account of the centre's requirement to serve the day to day needs of its local catchment in addition to continuing its role as a leading comparison retail destination with a regional catchment. The provision of a wide range of uses in Dundrum Major Town Centre, including employment, leisure, entertainment, cultural, hotel, restaurant and <u>significant residential development</u>, <del>in addition to residential development</del> will create additional activity and enliven the area.</i></p>	<b><u>B1072</u></b>	1	<p>The Executive note the issue raised.</p> <p>The Dundrum 'Phase 2' lands referred to by the submitter consist of the old Dundrum Shopping Centre and adjoining sites. The entire site is zoned Major Town Centre – <i>To protect, provide for and/or improve major town centre facilities</i>, under which a broad range of uses are permitted in principle, including residential. The submitter has requested that the wording of Policy Objective RET4: <i>Major Town Centres</i> be changed to refer to 'significant residential development' instead of 'in addition to residential development'. The purpose of the change would be to support the submitters 'residential-led' approach to the site. The section in question refers to the need to ensure an appropriate 'balance of retail and non-retail uses' and to the provision of a 'wide range of uses', however, the Draft Plan does not seek to define what that balance should be and whether it should tend toward a particular use, such as residential. It is not proposed to change the wording in accordance with the submitter's request, as it is considered appropriate that the Draft Plan should continue to refer to balance and the provision of a wide range of uses in accordance with the MTC zoning of the site. (See also section 3.14 SLOs)</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.7.3.8: Dundrum – Retail and Leisure</b>			
<p>i) The position of Dundrum in the retail and settlement hierarchy has been strongly reaffirmed in the Draft Plan and this is welcomed.</p>	<b>B1072</b>	1,5	<p>The Executive welcomes the support provided.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Request the broadening of the below objective (page 147) as follows (bold is a proposed addition):</p> <p>‘The promotion of Dundrum Major Town Centre in general, <b>and the Millpond Square</b>, Pembroke District <b>and Main Street</b> in particular, as an important focus of restaurant, leisure and evening uses - subject to the safeguarding of surrounding residential amenity’.</p>	<b>B1072</b>	1,5	<p>The Executive notes and agrees with the issue raised.</p> <p>Millpond square is an important gathering place within Dundrum and accommodates a range of restaurant units/operators. Main Street, too, accommodates restaurants and the location of additional restaurant units/operators on would help to bring additional activity into the evening. It is therefore considered appropriate to include a reference to Millpond Square and Main Street. It is also considered appropriate to include a reference to the Sandyford Road, where it is noted that recent public realm upgrades have facilitated outdoor seating adjacent to Ashgrove Terrace.</p> <p><b>Recommendation</b> Amend Section 7.5.2 Major Town Centres (page 147) to amend the existing bullet point as follows:</p> <p>From: <i>The promotion of Dundrum Major Town Centre in general, and the Pembroke District in particular, as an important focus of restaurant, leisure and evening uses – subject to the safeguarding of surrounding residential amenity.</i></p> <p>To: <i>‘The promotion of Dundrum Major Town Centre in general, and the <u>Millpond Square</u>, Pembroke District, <u>and Main Street/Sandyford Road</u> in particular, as an important focus of restaurant, leisure and evening uses - subject to the safeguarding of surrounding residential amenity’.</i></p>
<p>iii) Request that a development similar is scale to Kildare village should be considered for Dundrum.</p>	<b>B0437</b>	1	<p>The Executive notes the issue raised.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>Given the changing retail environment and the quantity of existing retail space already constructed in Dundrum, it is considered unlikely that an additional retail development in a form or scale similar to that of Kildare Village will eventuate. While any redevelopment along Main Street (e.g. at the 'Phase 2' site) should incorporate active uses and frontages at ground floor level, it is anticipated that such a redevelopment, unlike Kildare Village, would also include residential uses above. This form of development is considered more appropriate to a major town centre location.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Submission requests that any retail in the redevelopment for the Old Shopping Centre lands provide for Artisan shops and homegrown single traders and gives the example of the English Food Market in Cork is a good example, where local businesses seem to survive and flourish.</p> <p>Major developers tend to ignore certain demographics when it comes to retail, particularly the older shopper [relates to Dundrum].</p>	<p><b><u>B0437</u></b> <b><u>B0624</u></b></p>	<p>1</p>	<p>The Executive note the issue raised. Whilst the planning system has the ability under the legislation to grant permission for particular uses (e.g. retail, residential, restaurant, etc.) and potentially to include conditions on permissions to that effect, or even to condition use to a particular subtype of retail (e.g. convenience versus comparison retail), it is not possible to specify, either in the development plan or by way of condition, the nature of the retailer that can operate from a given unit (e.g. homegrown vs international). The nature of the final end user of a given unit is generally a matter for the market to determine. It is noted that there is a weekly farmers market in nearby Airfield</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.7.3.9: Dundrum – Community Infrastructure</b>			
<p>i) Request amendment to Section 7.5.2 as per the below in order to aid clarity (bold is a proposed addition, strikethrough a proposed deletion):</p> <p>The provision of appropriate community infrastructure to meet the needs of the current and future population in accordance with the recommendations of a detailed study of the broader Dundrum area. With its high quality transport links, Dundrum Major Town Centre should provide community facilities to cater to a population catchment greater than that of the more narrowly</p>	<p><b><u>B1072</u></b></p>	<p>1</p>	<p>The Executive notes the issue raised.</p> <p>It would appear that the purpose of the amendment sought would be to direct community infrastructure away from the Dundrum phase 2/old shopping centre site, leaving the Central Mental Hospital site as the only site identified for community infrastructure under this section. Given the scale of the phase 2 lands, their MTC zoning, the proportion of the overall MTC zoning within the Dundrum area which they represent and proximity to both the Dundrum Luas stop as well as the bus interchange (to be expanded under BusConnects proposals) it is considered reasonable that the site should include community infrastructure. It is noted that the previous permission for the site (D08A/0231/PL06D. 204042 - now expired) included a public library of c. 1,500 sq.m. This permission represented revisions and alterations to a more modest previously permitted scheme on the site, the parent permission</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
defined LAP boundary. The redevelopment of the old Dundrum Shopping Centre and the Central Mental Hospital site represents an opportunity to achieve additional community infrastructure in this regard.			<p>for which was granted in 2004 and which also included a public library (c.962 sq.m). As such, it is noted that successive permissions on the site have included community infrastructure.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission relate to the proposed new Dundrum Community, Cultural and Civic Centre as follows:</p> <ul style="list-style-type: none"> <li>• The building could be used for ½ Day / Day Courses, food education, performing arts.</li> <li>• The library should be connected via walkway or should be rehoused in the community building itself.</li> <li>• Should avoid a big open Civic Square in the development, as whatever benefit they have for occasional events, they result in ant social behaviour and do not work in bad weather</li> </ul>	<b>B0437</b>	1	<p>The Executive notes the issue raised.</p> <p>The Draft Plan includes a specific local objective in the form of SLO 114 <i>'To support the provision of a Dundrum Community, Cultural and Civic Centre which integrates into a civic square/plaza area to be located at the northern end of Dundrum town'</i>. While it is now proposed to include this as an objective under Section 7.5.2 <i>Major Town Centres</i> rather than as an SLO, the development of this facility will be the subject of future consultation and engagement with the local community and it is envisaged that it will provide a wide variety of uses and services to the community, including library uses. However, it is not proposed to fully define future uses in the County Development Plan at this point, as they will be designed to respond to the needs of the community when the facility is constructed and into the future.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.7.3.10: Dundrum – Open Space</b>			
<p>i) Dundrum Village needs to be remodelled in the form of a landscaped park and primarily a place where people live. Any development of the village should minimise hard landscaping, as far as is possible.</p>	<b>B0437</b>	1	<p>The Executive notes the issue raised.</p> <p>It is agreed that additional and/or upgraded public open space/plazas would benefit Dundrum and it is noted that the Draft Plan includes objectives in this regard (originally SLO114 – now an objective under Section 7.5.2 <i>Major Town Centres</i>). However, it is not considered possible or appropriate to 'remodel' an existing major town centre area in the manner referenced. The submitter's point in relation to hard landscaping is noted, however, this is a level of detail that is considered more appropriate to the forthcoming Dundrum LAP and/or an operational and design matter for any Council Department who are carrying out any urban realm works in the area.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
ii) Submission considers that the area in Dundrum to the back of the church has great potential to be used as a civic outdoor space.	<b>B0437</b>	1	<p>The Executive note the issue raised.</p> <p>It is noted that the Dundrum Urban Framework Plan 2003 included the provision of open space at this location and that the previously approved 'phase 2' permission (D08A/0231; PLO6D.204042 - now expired) included an urban space at this location. However, it is not proposed to attempt to define the design and layout of the area through the County Development Plan, as this is a matter for the future Dundrum LAP and/or the development management process. The normal requirements regarding the provision of public open space will apply to any future application.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
iii) Old Dundrum Shopping Centre – It is proposed that the area currently occupied by surface car parking be redesigned to accommodate a thriving community space. Dynamic park design facilitates valuable visible teenage recreation, concerts/theatre in the park, farmers market.	<b>B0624</b>	1	<p>The Executive notes the issue raised.</p> <p>The area referred to by the submitter is in private ownership and while it is considered reasonable that any redevelopment of the old shopping centre/Dundrum phase 2 site should incorporate an element(s) of community uses, the proposal, which appears to suggest the conversion of all/most of the existing surface car parking be converted to community uses, would place an excessive burden on a private landowner.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
iv) Airfield could support the creation of a community working garden in the centre of the village, which reflects the essence of the old village which was once farming land.	<b>B0624</b>	1	<p>The Executive notes the issue raised.</p> <p>The Council is developing a policy to encourage the setting up of community gardens at appropriate locations throughout the County. The exact location of any future Council led community gardens would be an operational matter for the parks department, however locating such a lands hungry use on lands zoned MTC may not be the most sustainable use of land. It is noted that community gardens which fall under the definition of open space in the Draft Plan are permitted in principle in the MTC zoning</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<b>3.7.3.11: Dundrum – Miscellaneous</b>			

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>i) Submission requests that Chapter 7 is updated to reflect the correct owners of the Central Mental Hospital lands.</p>	<p><b><u>B0529</u></b></p>	<p>1</p>	<p>The Executive notes the issue raised.</p> <p>A land registry search indicates that the ownership of the Central Mental Hospital site was transferred to the Commissioners of Public works (OPW) in 2016 and has not yet been transferred to the Land Development Agency (LDA). While the purpose of this section of the Draft Plan was merely to indicate that the lands are in state ownership and will be developed by the LDA for housing, it is proposed to update the Draft Plan to reflect the fact that the planning process is blind to land ownership and simply to recognise the important role that the site plays.</p> <p><b>Recommendation</b> Amend Section 7.5.2 <i>Major Town Centres</i> (p 145) as follows:</p> <p>From: <i>Importantly, the expanded boundary recognises the opportunity created by the future redevelopment of the substantial Central Mental Hospital site (c. 11.3ha), which now falls under the ownership of the Land Development Agency (LDA) following the decision to relocate the existing hospital to a new, purpose-built facility in Portrane, North County Dublin. The Council is cognisant of the important role that the site plays in the area and the potentially unique opportunity that it provides to contribute to both community infrastructure and quality housing provision.</i></p> <p>To: <i>Importantly, the expanded boundary recognises the opportunity created by the future redevelopment of the substantial Central Mental Hospital site (c. 11.3ha), <del>which now falls under the ownership of the Land Development Agency (LDA)</del> following the decision to relocate the existing hospital to a new, purpose-built facility in Portrane, North County Dublin. The Council is cognisant of the important role that the site plays in the area and the potentially unique opportunity that it provides to contribute to both community infrastructure and quality housing provision.</i></p>
<p>ii) Submission raises issues with terminology used in relation to Dundrum.</p>	<p><b><u>B0271</u></b></p>		<p>The Executive notes the issue raised.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>The only term that relates to Dundrum appears to be the zoning term Major Town Centre. There is no entity called Dundrum Village in the draft County Development Plan. There is one reference (7.4.2 bullet point 1) to Dundrum as 'the Town'. There is a need for Dundrum to be a place, and for its name and identity to be clear.</p> <p>Propose that the nomenclature referring to Dundrum would be further clarified in order for Dundrum to have a clear identity and referred to as follows:</p> <p>That Dundrum Village consists of the Main Street and the old Shopping Centre, including Waldemar Terrace.</p> <p>That 'Dundrum Town' consists of Dundrum Village and the Dundrum Town Centre Shopping Centre.</p>			<p>It is acknowledged that the use of the term 'Dundrum Town Centre' by the shopping centre which opened in 2005 has led to some confusion with regard to terminology, however, it is accepted that this term has now come to be synonymous with that development.</p> <p>Consequently, in the Draft Plan, the shopping centre is referred to as the 'Dundrum Town Centre Shopping Centre', whereas the settlement (the entire area, including the shopping centre) is referred to simply as 'Dundrum', while the MTC zoned lands alone are referred to as 'Dundrum Major Town Centre'. It is acknowledged that the name of the shopping centre can cause some confusion with regard to Dundrum's designation as a 'Major Town Centre' in the settlement hierarchy, second only to Dublin City Centre and on par with the likes of Dún Laoghaire, Liffey Valley, Blanchardstown, Swords, etc.</p> <p>It is not considered that the use of the additional term 'Dundrum Village' as suggested by the submitter to describe Main Street and the old Shopping Centre would alleviate this confusion. Rather, it is considered that this would create further confusion when viewed in the context of Dundrum's designation as a Major Town Centre and the MTC zoning of the lands in question. While the forthcoming Dundrum LAP may include additional terminology with regard to different or character areas in Dundrum (e.g. the Village character area), it is not considered appropriate to define these at this stage through the development plan process.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Areas in Dundrum could be designed to cater for entertainers that would give the village a reputation for quality street music.</p>	<b>B0437</b>	1	<p>The Executive notes the issue raised.</p> <p>It is noted that SLO 114 includes the provision of a new community, cultural and civic centre in Dundrum and that this facility would include a civic space/plaza which, presumably, could accommodate entertainers at a future date. However, the management of the space would be an operational matter and outdoor entertainment would be subject to the operational requirements of the time. (See below for recommended changes to SLO 114).</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
iv) Signage - Dundrum Luas Station makes a fabulous starting point for the Wicklow way, and should be well signposted.	<b>B0437</b>	1	<p>The Executive notes the issue raised.</p> <p>The designated start to the Wicklow Way is within Marlay Park, however, any improvements to pedestrian/green routes in the Dundrum area could make Marlay Park more accessible on foot from Dundrum. This is a matter that will be assessed as part of the Dundrum Area Based Transport Assessment (ABTA). In terms of signage in the area more broadly, it is likely that the Dundrum LAP will provide some additional guidance with regard to this issue.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
v) Dundrum – Due to the orientation of the main street, buildings on the west side should consider sunlight on the street. Creating a sun corridor as part of the redevelopment plan would draw people and support a thriving community.	<b>B0624</b>	1,5	<p>The Executive notes the issue raised.</p> <p>This issue has been dealt with in Chapter 12 <i>Development Management</i>, which sets out design criteria for new development and includes a requirement for a daylight analysis for all proposed developments in excess of 50 units. This section further states that development shall be guided by the principles of Site Layout Planning for Daylight and Sunlight, A guide to good practice (Building Research Establishment Report, 2011) and/or any updated guidance. As such, this is a matter for the development management process.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
vi) The submission highlights serious concerns with respect to the imminent redevelopment in Dundrum Village (including on the old shopping centre lands), especially in light of the extremely insensitive 2009 plan for Dundrum.	<b>B1124</b>	1	<p>The Executive note the issue raised.</p> <p>The Draft Plan contains a range of policies and objectives for the assessment of development proposals, which are designed to ensure a high level of amenity for both the receiving environment and for new residents. In the case of the old shopping centre site, the proposed architectural conservation area at the northern end of Main Street will provide an additional level of protection to the streetscape in that area, which was not in place when the previous proposals were assessed.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.7.3.12: Policy Objective RET5: District Centres</b>			

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
i) Request that Chapter 7 be amended to refer to the need to amend the Cherrywood Planning Scheme Town Centre Strategy.	<b><u>B1067</u></b>		<p>The Executive notes the issue raised. The Cherrywood Planning Scheme is made and amended under a separate legislative process to the County Development Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
ii) RET5 - District Centres: Support that the District Centres of Stillorgan and Nutgrove are maintained and promoted.	<b><u>B0942</u></b>		<p>The Executive welcomes the support provided.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Cornelscourt District Centre – The relationship and connections of the Shopping Centre with the village centres of Cornelscourt and Cabinteely should be mentioned.</p> <p>DC zoning at Cornelscourt Shopping Centre does not meet the criteria for a District Centre as laid out in Section 7.5.3 as the zone contains no leisure amenities, no financial services, no non-retail employment, minimal comparison shopping and no mixed uses beyond retail.</p> <p>Entirety of the District Centre zoning at Cornelscourt should not be owned and operated by a single company.</p>	<b><u>B0078</u></b>	7	<p>The Executive notes the issue raised.</p> <p>Section 7.5.3 refers to the retail and mixed-use element of the centres and not their relationship and connections to their adjoining villages, as is appropriate.</p> <p>Section 7.5.3 states that “<i>according to the RSGDA, District Centres will vary both in the scale of provision and size of catchment depending on proximity to a major town centre. However, a good range of comparison shopping would be expected (though no large department store) as well as some leisure activities, a range of cafes and restaurants and other mixed uses including employment. They should contain at least one supermarket and ancillary food stores alongside financial and other retail services.</i>” In this respect the district centre at Cornelscourt contains a retail foodstore, comparison retail shopping, a pharmacy, a café, hairdressers, optician, dry cleaners’ facilities, key cutting facilities, and a chapel. It is considered that the site offers a wide range of mixed-use activities.</p> <p><b>The ownership of a site is not a County Development Plan issue.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) The importance of neighbourhood and district centres should not be underestimated for facilitating the day-to-day needs of residents.</p> <p>Due to Covid, local retailing has grown significantly and DLRCC should take this opportunity to support</p>	<b><u>B1022</u></b>		<p>The Executive notes the issue raised.</p> <p>Chapter 7 of the Draft Plan contains policies supporting neighbourhood and district centres, for example Policy Objective RET6: Neighbourhood Centres which states: “<i>It is a Policy Objective of the Council to support the development of the Neighbourhood</i>”</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>the continued growth of local convenience with supportive policies, objectives and flexible zoning in the County Development Plan to ensure the continued vibrancy and viability of towns across the County.</p>			<p><i>Centres as the focal point of the communities and neighbourhoods they serve, by way of the provision of an appropriate mix, range and type of uses – including retail and retail services – in areas zoned objective ‘NC’ subject to the protection of the residential amenities of the surrounding area.”</i> and Policy Objective RET5: District Centres which states: <i>“It is a Policy Objective of the Council to maintain the District Centres at Blackrock, Stillorgan, Nutgrove and Cornelscourt, and to promote the mixed-use sustainable town centre which is currently under construction in Cherrywood in accordance with the approved SDZ Planning Scheme.”</i></p> <p>Furthermore, Policy Objective RET7: Local Shops supports local retailing and states: <i>“It is a Policy Objective of the Council to facilitate the provision of local convenience shops in residential areas where there is a clear deficiency of retail provision, subject to protecting residential amenity.”</i></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p><b>3.7.3.13: Policy Objective RET7: Local Shops</b></p>			
<p>i) A supermarket/local shops are required within walking distance of Aiken’s Village and Belarmine and food stores are required on Glenamuck Road.</p>	<p><b><u>B0050</u></b> <b><u>B0769</u></b> <b><u>B0942</u></b></p>		<p>The Executive notes the issues raised.</p> <p>In terms of local level retail provision in the Stepside area, there are three existing Neighbourhood Centres at Lamb’s Cross, Stepside Village and Belarmine Plaza (it is noted that some units are not trading). These Centres provide a range of neighbourhood shops and services to meet the day-to-day requirements of the local community and are connected by footpaths and cycle facilities to maximise the potential for trips to be made on foot or by bicycle. There are several larger convenience supermarkets located within close proximity to the Stepside area including: Dunnes Stores at the Leopardstown Valley Shopping Centre; Supervalu at the Balally Shopping Centre; and, Dunnes Stores at the Beacon. Each of these larger convenience store options are accessible from the Stepside area by sustainable modes of transport including local bus services, the LUAS and by cycling.</p> <p>Furthermore, planning permission has been granted at The Park, Carrickmines for a Neighbourhood Centre including two supermarkets and retail services. Under the Ballyogan and Environs Local Area Plan 2019-2025 a future ‘Greenway Spine’ for walking and cycling is proposed which will run parallel to, and alongside, the Ballyogan Stream Valley connecting the Stepside area with The Park at Carrickmines. Elements of this Greenway Spine are now in</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>place west of Kilgobbin Road, while some limited development has taken place to the east and south-east of Kilgobbin Road. It is anticipated that this Greenway will significantly increase safe and sustainable movement between the Stepside and Ballyogan areas increasing accessibility to a range of local amenities and community infrastructure, in addition to retail provision at the Leopardstown Valley Shopping Centre and The Park, Carrickmines.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Request for stronger anti-dereliction legislation, or could vacant units be Council supported arts centres/childcare facilities etc.to deal with empty retail units in Belarmine and Aiken's village</p>	<p><b><u>B1020</u></b></p>		<p>The Executive notes the issues raised.</p> <p>Vacant units are not defined as derelict units. There is strict criteria set out under the Derelict Sites Act 1990, as amended, to define a site as derelict. Strengthening of legislation falls outside the remit of the Local Authority.</p> <p>Policy objective CS14: Vacancy and Regeneration states: <i>"It is a Policy Objective to address issues of vacancy and underutilisation of lands within the County and to encourage and facilitate the re-use and regeneration of vacant sites subject to the infrastructural carrying capacities of any area."</i></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Goatstown/Clonskeagh needs more development as a village/community focal point. Goatstown Cross and Bird Ave are currently too limited and congested with traffic.</p>	<p><b><u>B0355</u></b></p>		<p>The Executive notes the issues raised.</p> <p>The Goatstown area will be developed in accordance with the policies and objectives of the Goatstown Local Area Plan 2010-2022. Two areas at Goatstown Cross carry the NC land use zoning objective while there are small areas at either end of Bird Avenue that carry the NC land use zoning objective. These areas allow for a variety of uses that contribute towards creation of sustainable neighbourhoods. (see also section 3.4)</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) DLR need to formulate a plan to deal with the decline of rural villages in the County:</p>	<p><b><u>B0302</u></b></p>		<p>The Executive notes the issue raised and the contents of the submission.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> <li>• Incentives such as exemption of development charges and rates</li> <li>• Rural innovation hubs</li> <li>• Provision of high-quality ICT infrastructure,</li> <li>• Enhanced town and village renewal supports</li> <li>• Assistance of community services</li> <li>• Rural link transport service needs to be promoted and assisted</li> </ul>			<p><b>The exemption of development charges and commercial rates are not County Development Plan issues.</b></p> <p>Separate to the County Development Plan process, the DLR Local Economic and Community Plan 2016-2021 (LECP) and DLR Local Enterprise Office (LEO) both promote and support economic development. DLR LEO provides a range of supports including financial supports, training/networking and business advice to companies at all stages of the business life-cycle.</p> <p>Furthermore, the LEADER programme is a rural development programme co-funded by the EU which operates a locally-led, bottom-up, approach to meeting the needs of local communities and businesses in rural areas. The programme supports private enterprises and community groups in rural areas. The Dublin Rural LEADER is responsible for implementing the LEADER Programme in the rural area of Dún Laoghaire-Rathdown.</p>
v) Submission requests the protection of the existing village feel of places like Cabinteely, Blackrock, Monkstown.	<b>B0724</b>		<p>The Executive notes the issue raised.</p> <p>Protection of the “village scale” of many of the Counties urban towns and villages is achieved through the use of the development management policies and objectives as set out in the Development Plan when assessing proposals for new development within these centres.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.7.4: Section 7.6 Assessment of Retail Development Proposals</b>			
<b>3.7.4.1: Policy Objective RET8: Assessment of Retail Proposals</b>			
<p>i) In accordance with the Retail Planning Guidelines, there is a presumption against large out of town retail development located adjacent or close to existing, new or planned national roads/motorways.</p> <p>Submission recommends that this issue be addressed in Sections 7.6 and 12.6 and SL0 82 that the preference for high trip generating activity should be within established town and district centres.</p>	<b>B0192</b>		<p>The Executive notes the issue raised and notes that it was also raised by the OPR.</p> <p>Policy Objective RET1 already states that the Council will have regard to the Retail Planning Guidelines in determining planning applications for retail development, and the Guidelines support a sequential development approach and plan led development approach with regards to retail. It is not considered that section 7.6 needs amendment as it already states the wording as stated in the TII submission that there shall be a “<i>general presumption against large out-of-town retail centres, in particular those located adjacent or close to existing, new or planned National Roads/Motorways</i>”. This is also stated in section 12.6.1 Assessment of Development Proposals in Towns, District and Neighborhood Centres. As any development</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>proposed under SLO 82 must be assessed under policies and objectives of the Plan as set out in sections 7.6 and section 12.6 it is respectfully considered that the line does not need to be restated.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>ii) Submission considers that detailed Retail Impact Assessment (RIA) and a Transport Impact Assessment (TIA) should be funded by DLRCC initially and then reclaimed from shop in additional rates when they can pay for it.</p>	<p><b>B1206</b></p>		<p>The Executive notes the issue raised.</p> <p><b>The payment of rates is not a strategic County Development Plan issue.</b></p> <p>The funding of any third-party report that forms part of a planning application in the matter for the applicant.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) County Development Plan and Retail Strategy needs to acknowledge the needs of modern retailers including appropriate floorplates, car parking and servicing access. Generally, modern larger retail convenience layouts require unobstructed and level floorplates with associated car parking, and where sites with these characteristics become available in or around town centre areas, it is important that DLRCC recognise these sites are suitable for accommodating the provision of convenience retailing facilities, rather than having to rely on consolidating the existing urban fabric to try and achieve a suitable conforming site.</p>	<p><b>B1022</b></p>		<p>The Executive notes the issue raised.</p> <p>Policy Objective RET1: Retail Planning Guidelines states that the Council will have regard for the Retail Planning Guidelines in determining planning applications for retail development, and the Guidelines identify five key Policy Objectives when addressing the development requirements of the retail sector:</p> <ul style="list-style-type: none"> <li>• Plan led development/retail strategies</li> <li>• Sequential development approach</li> <li>• Competitiveness in the retail sector</li> <li>• Encouraging sustainable travel</li> <li>• Retail development and design</li> </ul> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) The County Development Plan should safeguard the delivery and access routes and spaces to undertake deliveries to existing retailers.</p>	<p><b>B1022</b></p>		<p>The Executive notes the issue raised.</p> <p><b>Retail deliveries are not a County Development Plan issue.</b></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>Request that no policies are introduced that could lead to any restrictions on deliveries and that DLRC engage with retail operators as part of any future public realm or transportation strategies.</p> <p>Request that the delivery requirements of convenience foodstore operators are acknowledged and that policies providing for deliveries, including early morning deliveries, should be encouraged.</p>			<p>This is generally dealt with as part of a Traffic Management Plan as part of a planning application in the Development Management process. The allocation of spaces for deliveries may be accommodated by different departments in their public realm upgrade.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.7.5: Miscellaneous Retail Issues</b>			
<p>i) Fully support objectives MFC1-MFC3, RET6, RET8-RET10</p>	<b><u>B0942</u></b>		<p>The Executive welcomes the support provided.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Recommended to include the following policy in the County Development Plan:</p> <p>“To support and accommodate the growth of ‘Click and Collect’ retail services and grocery home shopping.”</p>	<b><u>B1022</u></b>		<p>The Executive notes the issue raised.</p> <p>The Draft Plan recognises that the retail sector as a whole has undergone significant change in recent years due to changes in both demographics and consumer behaviour, including falling household size, the rise of internet shopping, ‘click and collect’ and the emergence of ‘omni channel consumers’, who make use of a combination of traditional brick and mortar retailing combined with online platforms to make their purchases. The new focus in physical retailing is on what is referred to as ‘experiential’ retail, with a resultant shift from a town centre dominated by comparison retail offer to one where more time is spent on ‘experiences’ such as leisure, culture, food, beverages and retail services. This is supported by retail Policy Objectives such as MFC1: Multifunctional Centres, and telecommunications policies such as Policy Objective EI21: Telecommunications Infrastructure.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

### 3.8: Chapter 8 - Green Infrastructure and Biodiversity

It should be noted that where something is identified as an *Operational issue/Not a County Development Plan issue* in the Chief Executive's response, this does not mean that the Executive does not support the sentiments of the issues raised or that the Draft Plan limits or preclude delivery of the operational service identified.

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<b>3.8.1: General</b>			
i) Submissions provide positive commentary on the Draft Plan Chapter 8 including the prospects to be preserved (Section 8.1), Biodiversity initiatives and full support for Policy Objectives GIB1, GIB12, GIB13, GIB15, GIB17, GIB20, GIB25, GIB30.	<u>B0052</u> <u>B0326</u> <u>B0563</u> <u>B0587</u> <u>B0942</u>		The Executive welcomes the support provided.  <b>Recommendation</b> No change to Draft Plan.
ii) The submission expresses support with respect to the following: <ul style="list-style-type: none"> <li>• Green Infrastructure.</li> <li>• Policy Objective BIB3: Seascapes.</li> <li>• Policy Objective GIB4: High Amenity Zones.</li> <li>• Policy Objective: GIB5: Historic Landscape Areas.</li> <li>• Policy Objective GIB6: Views and Prospects.</li> <li>• Policy Objective GIB7: National Marine Planning Framework.</li> <li>• Policy Objective GIB8: Coastline Parks and Harbours.</li> <li>• Policy Objective GIB9: Beaches.</li> <li>• Policy Objective GIB10: Dublin Bay Biosphere.</li> <li>• Policy Objective GIB15: Recreation Access Routes.</li> <li>• Policy Objective: GIB19: Habitats Directive.</li> <li>• Policy Objective: GIB20: Biodiversity Plan.</li> <li>• Internationally Protected Areas.</li> <li>• Nationally Protected Areas.</li> </ul>	<u>B0594</u>		The Executive welcomes the support provided.  <b>Recommendation</b> No change to Draft Plan.

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
<ul style="list-style-type: none"> <li>• Policy Objective GIB22: Non-Designated Areas of Biodiversity.</li> <li>• Policy Objective GIB23: County-Wide Ecological Network.</li> <li>• Policy Objective GIB25: Hedgerows.</li> <li>• Policy Objective GIB28: Invasive Species.</li> <li>• Policy Objective GIB29: Nature Based Solutions.</li> <li>• Policy Objective GIB30: Promoting Biodiversity by avoiding Widespread Use of Herbicides and Pesticides.</li> </ul>			
<p>iii) Submission:</p> <ul style="list-style-type: none"> <li>• Welcomes integration of health policy into the planning process as referenced in Chapter 8, and request that this interrelationship should be more explicitly across all aspects of the County Development Plan.</li> <li>• The recognition of the necessity for “increasing awareness among all sections of the population of the importance of the County’s green infrastructure, landscape, and biodiversity” (Draft County Development Plan p 155).</li> <li>• Welcomes policy on biodiversity and requests greater acknowledgment of the starting point, i.e. the crisis caused by Ireland’s overall failure to protect its biodiversity over the last two or three decades.</li> <li>• Request that the Council must promote practical citizen involvement in developing, maintaining, and monitoring the growing green infrastructure, and in protecting our biodiversity.</li> </ul>	<b><u>B0271</u></b>		<p>The Executive notes the issues raised some of which pertain to the forthcoming Biodiversity Plan as opposed to the Draft County Development Plan.</p> <p>The interrelationship between health, healthy placemaking and well-being is evident in Chapter 8, Chapter 9, and Chapter 12 of the Draft Plan.</p> <p>The forthcoming DLR County Biodiversity Action Plan has been written with the EU Biodiversity Strategy 2030, and the National Biodiversity Action Plan 2017-2021, in mind along with other plans and policies. As outlined in the National Biodiversity Action Plan, 2017-2021, Ireland’s Vision for Biodiversity is “that biodiversity and ecosystems in Ireland are conserved and restored, delivering benefits essential for all sectors of society and that Ireland contributes to efforts to halt the loss of biodiversity and the degradation of ecosystems in the EU and globally”.</p> <p>The forthcoming DLR County Biodiversity Action Plan, 2021 – 2026, aims to incorporate the aims of these EU and National Biodiversity plans into objectives and actions.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Submission suggests that the term ‘green’ should be omitted from the title as Section 8.3 only deals</p>	<b><u>B0594</u></b>		<p>The Executive notes the issues raised.</p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
specifically with Green Infrastructure and the rest of the Chapter deals with infrastructure and biodiversity issues.			<p>The Draft Plan has identified Green Infrastructure as a key strategic asset for the County, and one which can aid in the creation of a climate resilient County, as set out in the overarching vision and County Strategic Outcomes in Chapter 1 of the Draft Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>v) Comprehensive and lengthy submission requests additional subsections with respect to heritage, mass rocks and Holy wells, peatlands, wetlands, amenity woodlands, special amenity areas, and County Heritage Plan, and advocates proposed policies derived from the Development Plans of Westmeath, Wicklow, South Dublin, North Tipperary, Offaly, Meath, Longford, Louth, Fingal, Kildare, and Cork County Councils.</p>	<b><u>B0594</u></b>		<p>The Executive notes the issues raised in this comprehensive submission.</p> <p>It is considered that various Chapters of the Draft Plan already address many of the items raised in the submission (Chapters 8, 9, 11 and 12). Additionally, the context of this submission fails to recognise, or fails to distinguish, the fundamental different contexts of suburban Dún Laoghaire-Rathdown (DLR) (acknowledging that the County does have a unique rural upland area) with the clearly rural context of many of the Counties referenced and that fact that policies in other counties may be bespoke to their unique character whilst those in DLR need to be bespoke to DLR.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.8.2: Section 8.3 Green Infrastructure</b>			
<b>3.8.2.1: Policy Objective GIB1: Green Infrastructure Strategy</b>			
<p>i) Submissions suggest that the Plan should emphasise the importance of green infrastructure:</p> <ul style="list-style-type: none"> <li>• For climate change adaption and mitigation, and the need to protect, develop and manage existing ecological network.</li> <li>• for their many varied and important ecosystem services.</li> <li>• Food Growing: Plan should promote the use of open space in housing developments and underutilized public land, for communal gardening and/or growing of vegetables.</li> <li>• As mitigation for air and noise pollution and rewilding initiatives.</li> </ul>	<p><b><u>B0406</u></b> <b><u>B0627</u></b> <b><u>B1088</u></b> <b><u>B1157</u></b></p>		<p>The Executive notes the issues raised.</p> <p>It is considered that the importance of Green Infrastructure (GI) for many facets of life is already very well documented in the Draft Plan including in Chapter 3 Climate Action, Chapter 8 Green Infrastructure and Biodiversity, specifically Section 8.3 and in Appendix 15 the Green Infrastructure Strategy. Chapter 12 in Section 12.2.1 also recognises the important role of biodiversity and green infrastructure in new builds and retrofits.</p> <p>Policy Objective GIB1: Green Infrastructure Strategy states that it is a Policy Objective “to continue to implement, and update, the DLR Green Infrastructure (GI) Strategy, to protect existing green infrastructure and encourage and facilitate, in consultation with relevant stakeholders, the development, design and management of high quality natural and</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<ul style="list-style-type: none"> <li>In new builds and retrofits.</li> </ul>			<p><i>semi-natural areas</i>". This recognises the ecosystems approach and the synergies that can be achieved with regard to sustainable transport, provision of open space, sustainable management of water, protection, and enhancement of biodiversity.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) The submission relates to Shankill area and requests that the sylvan nature of the area needs to be addressed and requests that the Flora and fauna of the coastline, views, and also tree coverage should be protected.</p>	<b>B0314</b>	10	<p>The Executive notes the issues raised.</p> <p>In the general Shankill area areas of tree coverage carry an objective to Protect and preserve trees and woodlands, relevant views are protected including the additional views at Shanganagh, which were added to the Draft Plan and areas of environmental importance are protected by way of pNHA, pSPA/SPA or CSAC/SAC designation.</p> <p>As per Policy Objective GIB1: Green Infrastructure Strategy, it is the Council's intention to review and update the existing Green Infrastructure Strategy for the County in consultation with all key stakeholders and with the public during the lifetime of the County Development Plan, 2022- 2028. The Strategy will identify key green infrastructure aims, with support from the forthcoming DLR County Wildlife Corridor Plan, 2021, and objectives for the County taking account of the main Policy Objectives identified in the County Development Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.8.3: Section 8.4 Landscape</b>			
<b>3.8.3.1: Policy Objective GIB2: Landscape Character Areas</b>			
<p>i) Submission requests:</p> <ul style="list-style-type: none"> <li>The carrying out of a heritage inventory of upland features within the Kilmashogue Valley and proper mapping and protection of the Kilmashogue Valley Landscape Character Area 1.</li> <li>That the Plan projects the areas of nature outstanding beauty and the historical sites in the County.</li> </ul>	<b>B0217</b> <b>B0729</b> <b>B0735</b>	8	<p>The Executive notes the issues raised.</p> <p>The Executive disagrees with contention that there are few areas of remaining natural beauty in the County. Dún Laoghaire-Rathdown is defined by its extensive network of parks and open spaces both along the coast and into the Dublin Mountains. The Draft Plan contains a suite of Policy Objectives aimed at protecting nature, landscapes and heritage. Chapter 8 'Green Infrastructure and Biodiversity' focuses on the protection and/or improvement of the natural environment and Chapter 11 'Heritage and Conservation' focuses on the protection of built heritage.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<ul style="list-style-type: none"> <li>Notes that there are few areas of natural beauty remaining and developers should not be allowed to destroy an area.</li> </ul>			<p>Policy Objective GIB2: Landscape Character Areas states that it is a Policy Objective “to continue to protect, manage and plan to conserve, maintain or enhance the distinctive characteristics of the County’s landscapes, townscapes and seascapes in accordance with the recommended strategies as originally outlined in the Landscape Character Assessment (2002 and since updated), in accordance with the ‘Draft Guidelines for Landscape and Landscape Assessment’ (2000) as issued by the Department of Environment and Local Government, in accordance with the European Landscape Convention (Florence Convention) and in accordance with ‘A National Landscape Strategy for Ireland – 2015-2025’.</p> <p>The key action in Phase one of the National Landscape Strategy for Ireland, 2015 - 2025 is the preparation of a National Landscape Character Assessment. The second phase is the preparation of statutory guidelines on local Landscape Character Assessments for Planning Authorities. These actions have not yet been completed at a national level. It is envisaged that the existing landscape character assessment will be reviewed once the national assessment has been completed and guidelines issued.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) The submission suggests replacement wording for Policy Objective GIB 2: Landscape Character Areas which is based on numerous County Development Plans. Several additional Policy Objectives are drafted for inclusion in this regard.</p>	<b><u>B0594</u></b>		<p>The Executive notes the issue raised.</p> <p>It is considered that existing Policy Objective GIB2, is sufficiently robust and deliberately worded to achieve the aims of the Council regarding Landscape Character Areas, and that additional policies in this regard are neither required nor necessary.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submissions relate to Kiltiernan area and;</p> <ul style="list-style-type: none"> <li>Considers that the unique landscape and character of Kiltiernan-Glenamuck should be protected.</li> <li>Considers that natural wildlife habitats have been eroded by development and views of mountains and trees are declining.</li> </ul>	<b><u>B0247</u></b> <b><u>B1126</u></b>	9	<p>The Executive notes the issues raised.</p> <p>As per Policy Objective GIB5: Historic Landscape Character Areas (HLCA) includes a detailed holistic study of the historical development and environmental significance of an area. The HLCA offers a dynamic perspective of the total landscape, thereby contributing to the management, and promotion of sustainable development within that area. A HLCA has been carried out for Kiltiernan.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<p>The Draft County Heritage Plan includes an action to “<i>update and expand DLR’s Historic Landscape Character mapping, identifying the visible and connected remnants of the past in contemporary urban, per-urban and rural landscapes</i>”.</p> <p>The Kiltiernan-Glenamuck Local Area Plan also contains policies and objectives in Section 3, <i>Landscape, Heritage and Conservation</i> pertaining to the protection of the unique landscape and character of Kiltiernan-Glenamuck.</p> <p>The Planning Authority acknowledges, however, that the Kiltiernan - Glenamuck has been identified in the core strategy as a “new residential community”.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.8.3.2: Policy Objective GIB4: High Amenity Zones</b>			
<p>i) Submission suggests that Shankill should be given the status of an Area of High Environmental Sensitivity.</p>	<b>B0314</b>	10	<p>The Executive notes the issue raised.</p> <p>The County Development Plan maps indicate areas that are zoned as High Amenity areas. These areas consist of landscapes of special value where inappropriate development, would contribute to a significant diminution of the landscape setting of the County. These areas include the Glencullen Valley, Glendoo Valley and Kilmashogue Valley.</p> <p>It is not considered that this land use zoning objective would be appropriate for Shankill.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission requests the preservation of the mountains, restricting development in high amenity areas, and that the preservation of hedgerows should be at the forefront of the Plan.</p>	<b>B0818</b>		<p>The Executive notes the issue raised.</p> <p>Policy Objective GIB4: High Amenity Zones, states that it is an objective of the Council “<i>to conserve and enhance existing High Amenity Zones and to seek to manage these and other areas to absorb further recreational uses and activity without damaging their unique character</i>”. Therefore, within these areas, the presumption will be generally to resist any development not directly related to the area’s amenity potential, or its existing use for agriculture, mountain, or hill farming.</p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
			<p><b>Recommendation</b> No change to Draft Plan.</p>
<p><b>3.8.3.3: Policy Objective GIB5: Historic Landscape Character Areas</b></p>			
<p>i) Submission requests that historical right of ways and walks should be maintained and promoted and the lands west of the Enniskerry Road, Dingle, Glen and Ballycorus Valley must be protected.</p>	<p><b><u>B1171</u></b></p>		<p>The Executive notes the issue raised. The County Development Plan lists and maps Public Rights of Way in the County. The County Heritage Plan includes actions to “map and develop projects on the historic paths we tread; mass routes, military routes, designed avenues, sheep walks and pedestrian links through the urban fabric, to the coast and into the mountains.” and... “update and expand DLR’s Historic Landscape Character mapping, identifying the visible and connected remnants of the past in contemporary urban, per-urban and rural landscapes”.</p> <p>It is considered that the land use zonings and environmental designations set out in the Draft Plan, which apply to the lands west of the Enniskerry Road, Dingle, Glen and Ballycorus Valley ensure adequate protection.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p><b>3.8.3.4: Policy Objective GIB6: Views and Prospects</b></p>			
<p>i) The submissions request that the following views be included on the list of most important ‘views and prospects’ within the County:</p> <ul style="list-style-type: none"> <li>• From Marlay park to Three Rock and Kilmashogue.</li> <li>• The land west of the Enniskerry be a protected view.</li> <li>• From Sorrento Park summit should be protected.</li> <li>• Preservation of views off Murphys lane and Pucks Castle Lane.</li> <li>• Request that views through Clontra, towards the sea are protected.</li> </ul> <p>Submission requests that the following prospects should be Preserved:</p>	<p><b><u>B0052</u></b> <b><u>B0475</u></b> <b><u>B0630</u></b> <b><u>B0814</u></b> <b><u>B0869</u></b> <b><u>B1155</u></b> <b><u>B1189</u></b></p>	<p>4 5 8 9 10 14</p>	<p>The Executive notes the issues raised.</p> <p>The following prospects are listed in Table 8.1 Prospects to be Preserved:</p> <ul style="list-style-type: none"> <li>• Three Rock Mountain and Kilmashogue Mountain from Marlay Park.</li> <li>• Carrickgollogan from the Enniskerry Road (south of Kiltiernan Village).</li> <li>• The Scalp from Ballyman Road and part of the Enniskerry Road.</li> <li>• Three Rock Mountain and Two Rock Mountain from the Enniskerry Road (Sandyford-Kiltiernan area) and Sandyford Village.</li> </ul> <p>Maps 4, 10, 13 of the Draft Plan recognises the views from Sorrento Point, Pucks Castle Lane, and Murphy’s Lane, which are marked with the symbol and associated objective “to preserve views”.</p> <p>In relation to the proposed addition of protected view symbols on ‘Quinns Road’ at ‘Clontra’, following a site inspection, it is the opinion of the Executive, that it is the parallel line of</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<ul style="list-style-type: none"> <li>• Carrickgolligan, Great Sugarloaf and surrounding mountains from numerous locations including Shanganagh Cliffs, Main Street, Quinn's Road, Shanganagh Park, St Anne's Church, New Vale, St Anne's School and Stonebridge Road.</li> <li>• Great Sugarloaf from the Old Harcourt Street Line Bridge and St Anne's Church.</li> <li>• Bray Head from Library Road.</li> <li>• Kish Lighthouse from Stonebridge Road,</li> <li>• Three Rock Mountain from Stonebridge Road.</li> <li>• The Irish Sea from Rathmichael Road.</li> </ul>			<p>deciduous mature deciduous trees, which add significantly to the overall semi-rural and unique character and ambience of the area and the laneway as opposed to any view through 'Clontra'. The Draft Plan contains tree symbols to protect and preserve trees at this location. The deciduous nature of the roadside boundary of 'Clontra' results in a seasonality of any view, however even at this, any views of the house or the sea are limited and do not, when compared with listed views further north, meet the criteria of <i>'special amenity, value or interest'</i>.</p> <p>The Draft Plan states on page 160 states that <i>"Additional views and prospects may be considered throughout the lifetime of the Plan"</i>. The additional prospects put forward for inclusion would require detailed assessment which it is respectfully considered is a body of work that could not be carried out in any meaningful way in the statutory time that is available for the preparation of the Chief Executives Report on the Draft Plan. It is recommended that these additional prospects be reviewed during the lifetime of the Plan in line with the wording stated on page 160. It is noted that the prospect of Carrickgolligan from numerous locations is already listed in table 8.1.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission:</p> <ul style="list-style-type: none"> <li>• Welcomes the inclusion of 'View" in the Shanganagh Cliffs area.</li> <li>• Notes that Local communities have had considerable input into this space in terms of clean-ups and monitoring.</li> <li>• The acclaimed shoreline Rock Art Trail has been a welcome addition; therefore, an additional viewpoint be included on the raised embankment at Shanganagh Cliff.</li> </ul>	<b>B0630</b>		<p>The Executive welcomes the support provided and the sentiments of the submission.</p> <p>Policy Objective GIB6: Views and Prospects of the Draft Plan states that, <i>"Where possible, DLR will seek to improve and retain the viewing potential of existing views and/or Prospects"</i>.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) The submission welcomes the objectives included to ensure the views to the Lead mines and Carrickgolligan are maintained along Ballycorus Road.</p>	<b>B1159</b>	10	<p>The Executive welcomes the support provided.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
iv) Submissions relate to views and prospects as follows: <ul style="list-style-type: none"> <li>Request that Policy Objective GIB6 be amended as part which states 'or otherwise interfere with Views and/or Prospects' is open to a very broad interpretation. Significance of impact is the issue.</li> <li>Protecting prospects and views must be at the forefront of planning decisions.</li> </ul>	<u>B0114</u> <u>B0600</u>		The Executive notes the issues raised.  The interpretation of Policy Objective GIB6, and the interference or otherwise of a proposed development with a view or prospect is assessed at planning application stage. The Executive would concur that it is the significance of the effect of any such interference, which is the key consideration. Therefore, it is considered that there is no requirement to change the wording in the Draft Plan.  <b>Recommendation</b> No change to Draft Plan.
<b>3.8.4: Section 8.5 The Coast</b>			
i) The submission welcomes the recognition of the importance of the Booterstown Marsh Nature Reserve as a wetland.	<u>B0794</u>		The Executive welcomes the support provided.  <b>Recommendation</b> No change to Draft Plan.
ii) The submission recommends that an objective be included (jointly with Dublin city Council), to address the ongoing sewage issue at Booterstown beach and in the Trimelstown and Elmpark Streams.	<u>B0794</u>		The Executive notes the issue raised. Water samples from locations along the Trimelston Stream are regularly taken by DLR to assess water quality and to investigate sources of pollution. This has informed the SEA for the Draft Plan. Addressing any sewage issue would be a matter for Irish Water.  <b>Recommendation</b> No change to Draft Plan.
<b>3.8.4.1: Policy Objective GIB8: Coastline, Parks and Harbours</b>			
i) Submissions relate to Bullock harbour as follows: <ul style="list-style-type: none"> <li>Request that the Plan reference Bullock Harbour as a coastline public amenity.</li> <li>Submission requests that the Council progress and expand the work begun with the 2020 Masterplan for Sandycove and Bullock Harbours.</li> <li>Requests that some of the measures and suggestions of the Masterplan for Sandycove</li> </ul>	<u>B0426</u> <u>B0489</u> <u>B0890</u>	4	The Executive notes the issue raised. The coastline public amenity role of Bullock Harbour is well documented in the 2020 <i>Masterplan for Sandycove and Bullock Harbours</i> which states that " <i>The Harbours have a role as public spaces, social and cultural hubs, natural amenities and recreation for water sports ranging from swimmers to paddle boarders</i> ".  The role of the Masterplan was to provide a context for any future place making and public realm enhancements of the Harbour lands within public ownership, as well as providing a wider context and guidance that could influence the future function and operation of both places. The concept guidance and proposals contained only relate to relevant Harbour lands in public ownership and/or control. It is recommended that the Draft Plan be amended to

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
and Bullock Harbours should be considered for inclusion in the Plan.			<p>ensure that any public realm upgrades at both Sandycove and Bullock Harbours have regard to the concept proposals that are contained in the Masterplan.</p> <p><b>Recommendation</b> Amend Policy Objective GIB8: Coastline, Parks and Harbours (p. 162) to insert a new sentence at end of the paragraph as follows:</p> <p><i>Any public realm projects at both Sandycove and Bullock Harbours shall have regard to the concept proposals that are contained in the 2020 Masterplan for Sandycove and Bullock Harbours.</i></p>
<b>3.8.4.2: Policy Objective GIB9: Beaches</b>			
i) Submission raises issue of litter on beaches.	<b>B0587</b>		<p>The Executive notes the issue raised.</p> <p>Recycling bins are scheduled for installation at the main beaches during the summer months. These bins will facilitate the collection of only paper and plastics. All food waste is disposed of in the normal street bin. Bin collections are conducted as and when required by the automatic telemetry systems contained within the smart bins. Additional collections are conducted at and during the high season of business and this will be maintained. The Council's Litter Wardens carry out daily patrols throughout the County.</p> <p><b>This is not a County Development Plan issue.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
ii) Submissions references Policy Objective GIB8: and notes that it is vitally important that the Fisheries Service is involved at as early a stage as possible in development proposals and in forward planning.	<b>B0131</b>		<p>The Executive notes the issue raised.</p> <p>Policy Objective GIB24: Rivers and Waterways states that it is a Policy Objective to “<i>maintain and protect the natural character and ecological value of the river and stream corridors in the County and where possible to enhance existing channels and to encourage diversity of habitat and nature-based solutions that incorporate biodiversity features. It is also policy (subject to the sensitivity of the riverside habitat), to provide public access to riparian corridors, to promote improved passive recreational activities</i>”.</p> <p>The Council and applicants consult as appropriate with Inland Fisheries.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submission requests the refurbishment, renewal, and repair of the lower coastal pedestrian walk between Sandycove beach to the baths in Dún Laoghaire.</p>	<p><b>B0949</b></p>	<p>3</p>	<p>The Executive notes the issue raised.</p> <p>DLR also carry out day to day maintenance at the County's beaches and bathing areas.</p> <p><b>This is an operational issue and not a County Development Plan issue.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p><b>3.8.4.3: Policy Objective GIB10: Dublin Bay Biosphere</b></p>			
<p>i) Submission requests that the Council ensure all aspects of the management of Dublin Bay Biosphere Reserve are implemented in line with the LIMA Action Plan.</p>	<p><b>B0929</b></p>		<p>The Executive notes the issue raised.</p> <p>While implementation and management of the Biosphere are not strictly County Development Plan matters, DLR as partners of the Dublin Bay Biosphere Reserve work to implement the actions of the LIMA Action Plan including for example our Charter for businesses operating within the Biosphere, ongoing studies of the habitats and species, conservation actions and development of the Education and Communications Strategy, website, workshops etc.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission notes that the coastal amenity area that lies to the east of Bayview Estate, Killiney Hill Road provides access to the rugged natural shoreline of Killiney Bay, which has a special coastal character.</p>	<p><b>B0630</b></p>	<p>10</p>	<p>The Executive notes the issue raised.</p> <p>Policy Objective GIB11: Coastal Area Feasibility Study states that <i>"it is a Policy Objective to explore undertaking a comprehensive feasibility study on the recreational potential along the coastal area of the County, which comprehensively addresses recreational impact - including visitor numbers, mapping and surveying of sensitive habitats and species and identification of significant threats on European sites - and which would allow an assessment of any future proposals, alone or in combination, to assess impact on the coastal and marine zone within and adjacent to the County boundary. The Council will explore the possibility of carrying out this study with adjoining and/or coastal Local Authorities and/or other agencies"</i>.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submission recommends amending the Policy Objective on the Biosphere to reflect both the official UNESCO designation accorded to Dublin Bay and the recent change of parent Department for the National Parks and Wildlife Service.</p>	<p><b>B1247</b></p>		<p>The Executive notes and concurs with the issue raised.</p> <p><b>Recommendation</b> Amend Policy Objective 8.5.4 Policy Objective GIB10: Dublin Bay Biosphere (page 162) as follows:</p> <p>From</p> <p><i>The biosphere is managed by the Dublin Bay Biosphere Partnership which includes Fingal County Council, Dublin City Council, DLR County Council, Dublin Port Company and the National Parks and Wildlife Service of the Department of the Arts, Heritage and the Gaeltacht</i></p> <p>To</p> <p><i>'The biosphere <u>reserve</u> is managed by the Dublin Bay Biosphere Partnership which includes Fingal County Council, Dublin City Council, DLR County Council, Dublin Port Company and the National Parks and Wildlife Service of the <u>Department of the Arts of Housing, Local Government and Heritage and the Gaeltacht</u></i></p>
<b>3.8.5: 8.6 Access and the Mountains</b>			
<p>i) Submission suggests that the Title is misleading in that it seems to imply that somehow access to the mountains is more important than access to other parts of the County which should, of course, not be the case, therefore, the provisions herein require repositioning.</p> <p>Additionally, the first paragraph should be repositioned in Chapter 9 Open, Space, Parks and Recreation in a proposed subsection titled: Recreation and Sport.</p>	<p><b>B0594</b></p>		<p>The Executive notes the issues raised.</p> <p>The layout of the Draft Plan was modified with respect to Chapter 8 and Chapter 9 which formed part of Chapter 4 Green County of the 2016-2022 County Development Plan (County Development Plan). The subtitle 'Access and the Mountains', was retained from the 2016 County Development Plan and relates to policies with respect to access to natural heritage, the mountains, rights-of way, trails etc. The paragraph references the variety of recreational uses associated with this section of the Draft Plan and associated Policy Objectives to protect and enhance the mountains, including their use for access and recreation.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
<p>ii) Submission considers that the mountains importance as natural and scenic amenities and the Council’s commitment to conserving them should be highlighted in this section as should the presence of EU habitats and the importance of the conifer plantations in the mountains for red squirrels. Submission requests that the title be changed to “The Mountains and Access to them”.</p>	<p><b>B1247</b></p>		<p>The Executive notes the issues raised.</p> <p>It is agreed that section 8.6 should be amended to acknowledge the natural and scenic amenity role of the mountains. Section 8.6 deals with access to the Mountains and contains 6 Policy Objectives, a number of which specifically address access ranging from public rights of way, recreational access routes to trails and hiking. The section which follows addresses biodiversity and contains Policy Objectives on designated sites and EU habitats. It is respectfully considered that there is no requirement to include detail on EU habitats in section 8.6 and that the level of detail pertaining to the importance of the conifer plantations in the mountains for red squirrels is too granular a level for a County Development Plan and may be more relevant to the Biodiversity Plan. The Executive would not support the proposed section title change.</p> <p><b>Recommendation</b>  <i>Amend section 8.6 (page 163). Insert new line at end of first paragraph page 163 as follows; “The Dublin mountains also play an important role as a natural and scenic amenity (see also sections 8.4 Landscape and 8.7 Biodiversity)”.</i></p>
<p><b>3.8.5.1: Policy Objective GIB12: Access to Natural Heritage</b></p>			
<p>i) Submission suggests that the first phrase of Policy Objective GIB12: Access to Natural Heritage should be repositioned in Chapter 11 Heritage and Conservation as an additional suggested subsection Natural Heritage, Environment and the Uplands and Access to the Countryside and merged with a suggested Policy objective. Several additional Policy Objectives are drafted for inclusion in this regard.</p>	<p><b>B0594</b></p>		<p>The Executive notes the issues raised.</p> <p>The proposed terminology in the submission relating to access to natural heritage includes references to “<i>public access to routes, designating walking routes, and prohibiting intrusive development</i>”. Existing Policy Objective GIB12 states that it is Council Policy “<i>to promote, protect and enhance sustainable and appropriate access to the natural heritage of the County, where practicable, in a balanced way while protecting the natural heritage of the County.....</i>”.</p> <p>Therefore, Policy Objective GIB12 is intrinsically driven by the imperative of promoting appropriate access. The additional policy wording is not recommended.</p> <p>The submission proposal - to relocate this Policy Objective to Chapter 11, specifically natural Heritage, is not warranted as Section 8.6 of the Draft Plan refers to ‘<i>Access and the Mountains</i>’.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<p>ii) Submission recommends the inclusion of a new Policy as follows:</p> <p>'8.5.6 Policy Objective GIB12: Access to Water It is a Policy Objective to support both the enhancement of existing and development of new access to water locations in the County for recreation purposes. The provision of shared facility centres for water-based activities in the County shall be supported by the Council.'</p>	<b><u>B0896</u></b>		<p>No change to Draft Plan.</p> <p>The Executive notes the issue raised. The Dún Laoghaire Urban Framework Plan, which forms Appendix 8 of the Draft Plan, contains a detailed section on 'The Waterfront' and 'St. Michael's Wharf' - section 8.5.1. This section of the Dún Laoghaire Urban Framework Plan along with section 8.6.10, which relates to the 'Gut/West Pier', already addresses the need to ensure that future development allows the public direct access to the water.</p> <p>In addition, Section 8.5.2 Policy Objective GIB8: Coastline Parks and Harbours states that <i>"It is a Policy Objective to continue to upgrade recreational and tourism-related amenities in the public parks and harbours along the coastline, including improved accessibility by the general public"</i>.</p> <p>It is considered that the sentiments of the submission in relation to access are already addressed in existing policy. The provision of shared facility centres for water-based activities in the County is already supported by the Council in terms of recent announcement for such facilities at Killiney, and the commitment to a feasibility study for such facilities at Dún Laoghaire using the Large Sports Infrastructure structure funding.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.8.5.2: Policy Objective GIB13: Dublin Mountains Strategic Plan</b>			
<p>i) Submission highlights pressures that existing in Dublin mountains from visitors, welcomes the Coillte re-planting programme, question why there is no increase in resource allocation for rangers and for monitoring public use and considers that the risk to adjoining properties (and private forestry adjacent) through fire, theft, and trespass has not been addressed by the Dublin Mountain Partnership.</p> <p>ii) Submission suggests that Policy Objective GIB 13: Dublin Mountains Strategic Plan should be deleted from the Draft Plan for several reasons including:</p>	<b><u>B0217</u></b> <b><u>B0594</u></b>	8	<p><b>The Executive notes the issues raised many of which are outside the remit of the County Development Plan.</b></p> <p>DLR is part of the Dublin Mountain Partnership (DMP) and in many instances provide the infrastructure on which the service operates. The long-term strategy is to manage recreation in the Dublin Mountains on a more sustainable basis. A number of initiatives have been carried out by the DMP including the provision of new and upgraded trails, improved signage and the preparation of a custom DMP map.</p> <p>Furthermore, the Council are members of the Dublin Mountains Partnership which comprises representatives from a wide range of partner organisations. The Draft Plan continues to support the work and role of the Dublin Mountain Partnership in improving the recreational experience for users of the Dublin Mountains.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<ul style="list-style-type: none"> <li>• The end of Coillte Forestry at 3 Rock Mountain to Shankill has ignored all the public rights of way as set out in the Development Plan and has used instead public roads without pavements.</li> <li>• South Dublin is referenced whereby until the route enters Coillte Forestry at Massy's Woods it is mostly all routed along public roads without pavements. South Dublin they have erected signage supporting the closure by a landowner of a traditional pathway without suggesting an alternative off route.</li> <li>• The only worthwhile section of the route is through Coillte Forestry most of which was already there when DMP was set up in 2008.</li> </ul>			<p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submission from Coillte requests policy support in the Plan to explore the provision of cable car infrastructure to improve accessibility to the Dublin Mountains.</p>	<b>B0563</b>		<p>The Executive notes the issue raised.</p> <p>It is considered that Policy Objective GIB12: Access to Natural Heritage which states that <i>"It is a Policy Objective to promote, protect and enhance sustainable and appropriate access to the natural heritage of the County, where practicable, in a balanced way while protecting the natural heritage of the County"</i> provides a policy backdrop for improved accessibility to the Dublin Mountains. The Draft Plan acknowledges that the Dublin Mountains now cater for a wide range of recreational users.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<b>3.8.5.3: Policy Objective GIB14: Public Rights-of-Way</b>			
<p>i) Submission requests a proper link between Enniskerry and Kiltiernan. Option proposed is from kiltiernan, into Barnaslingan woods, down Barnaslingan Lane and then down monastery road to Enniskerry.</p>	<b>B0587</b>		<p>The Executive notes the issue raised.</p> <p>The provision of a pedestrian/cycle link from Kiltiernan to Enniskerry utilising recreational access routes, rights of way, private lands and public roads <b>is an operational matter and not a County Development Plan issue</b>. Enniskerry also falls within the jurisdiction of Wicklow County.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission contends that, due to a flaw in the legislation, it seems that there is no protection for public rights of way listed after March 2002. This affects both existing and future public rights of way.</p> <p>Therefore, Policy Objective GIB14: Public Rights of Way should be replaced by a new suggested policy with associated text, based on numerous Local Authority County Development Plan examples. Several additional Policy Objectives are drafted for inclusion in this regard.</p>	<b>B0594</b>		<p>The Executive notes the issue raised and whilst it is considered that case law most notably the Lisadell case has created difficulties in relation to listing ROW in the County Development Plan. The Executive are not aware of the legal flaw referenced in the submission.</p> <p>Policy Objective GIB14: Public Rights-of Way, is considered a robust and comprehensive policy framework which more than adequately addresses the preservation, protection, promotion, and creation (of new) Public Rights-of-Way across the County. It is considered there is no compelling need or imperative to introduce any new policies in relation to Rights-of-Way. Policy Objective GIB14: Public Rights-of-Way already adequately covers the issue of Rights-of-Way.</p> <p>In accordance with Section 10(2) (O) of the Planning and Development Act, 2000 (as amended), the Draft County Development Plan includes objectives for the preservation of public rights-of-way, which give access to seashore, mountains, lakeshore, riverbanks or other places of natural beauty or recreational utility.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submission requests that the Council enhance the pedestrian route between Shankill Village and Ballybride Road if legally possible through landscaping through Section 8.6.3 of the Draft or as an SLO (part of Dublin Mountain Way).</p>	<b>B0814</b>		<p>The Executive notes the issue raised.</p> <p>This is a ROW listed in the Draft County Development Plan. The enhancement via landscaping of the well-used pedestrian/cycle permeability link which crosses the M50 already existing from Shankill village (new Vale/Hilltop lawn) to Ballybride Road <b>is a parks operational matter not a County Development Plan issue.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.8.5.4: Policy Objective GIB16: National Park</b>			
<p>i) Submission suggests that Policy Objective GIB16: National Park should be prefix with Policy Objective Wicklow Mountains, and should include to promote,</p>	<b>B0594</b>		<p>The Executive notes the issue raised.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
add, and enhance. Several Policy Objectives are also suggested for inclusion, including a proposed Policy Objective with respect to National Parks.			<p>The existing Policy Objective GIB16, references the Wicklow Mountains National Park. As only a very small portion of the park falls within the jurisdiction of Dún Laoghaire-Rathdown an additional Policy Objective "Wicklow Mountains", is not warranted.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.8.5.5: Policy Objective GIB17: Trails, Hiking and Walking Routes</b>			
<p>i) Submission suggests that Policy Objective GIB17: Trails, Hiking and Walking Routes, should be repositioned in Chapter 5: Transport &amp; Mobility in Section 5.5 by Promoting active Travel: Cycling and Walking as an additional Policy Objective. Paragraph three should also be positioned in Chapter 5 as an additional Policy Objective.</p> <p>Additionally, the first paragraph should be repositioned in Chapter 11 Heritage and Conservation as an additional subsection: G County Heritage Plan Policy Objective.</p>	<b>B0594</b>		<p>The Executive notes the issue raised.</p> <p>Section 8.6 of the Draft Plan references 'Access and the Mountains', therefore Policy Objective GIB17: Trails, Hiking and Walking Routes, is associated with Chapter 8.</p> <p>The existing Policy Objective GIB17: Trails, Hiking and Walking Routes is robust and comprehensive and already gives significant Council commitment to the promotion and development of Regional and Local networks of walking and hiking trails throughout the County.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission requests that future signage consider the use of information panels as appropriate to highlight the significance of a County Geological that are in the vicinity of waymarked and signposted walking routes/trails.</p>	<b>B0249</b>		<p>The Executive notes the issue raised.</p> <p><b>This is not a County Development Plan issue however; this will be incorporated into the work of the Heritage Officer.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submission requests the creation of a walking/cycling trail from Bray to Enniskerry along the Dargle River.</p>	<b>B0869</b>	14	<p>The Executive notes the issue raise, however, <b>the provision of a pedestrian/cycle link from Bray to Enniskerry along the Dargle River is an operational matter and not a County Development Plan issue.</b></p> <p>Enniskerry is located in the adjoining jurisdiction of Wicklow with the Dargle forming the County boundary between DLR and Wicklow. Much of the lands are also in private ownership. The provision of walking/cycling trails is not recommended in very close proximity to a</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<p>watercourse, as per the IFI guidelines <i>Planning for watercourses in the Urban Environment 2020</i>.</p> <p>The Executive is supportive of the suggestion and notes that there is nothing in the Plan to prevent this.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Submission suggests the creation of a new walking trail, bike trails and new woodlands on the way up to Ticknock forest. A map which indicates two trails has been submitted.</p>	<p><b>B0030</b></p>	<p>5</p>	<p>The Executive notes the issues raised.</p> <p><b>The provision of new walking trail, bike trails and new woodlands on the way up to Ticknock forest is not a County Development Plan issue.</b></p> <p>The Dublin Mountain Partnership (DMP) manage the trails and linkages through Ticknock forest, which is on Coillte Lands. The Council works with the DMP.</p> <p>The Executive is supportive of the suggestion and notes that there is nothing in the Plan to prevent this.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>v) Submission requests that the Council develop formal walking and cycling trails in the historic Barnacullia area above the Blue Light Pub.</p>	<p><b>B0122</b></p>		<p>The Executive notes the issue raised. There is an existing right of way through Fernhill Park which utilises the existing granite sets and links up to Barnacullia. This does continue via informal walking routes on private lands around Barnacullia.</p> <p>The Executive is supportive of the suggestion and notes that there is nothing in the Plan to prevent this.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>vi) Submission requests that all local "mass paths" be retained.</p>	<p><b>B1165</b></p>		<p>The Executive notes the issue raised.</p> <p>Action 2.2.3 of the Dún Laoghaire-Rathdown Draft Heritage Plan 2021- 2025 is to <i>"Map and develop projects on the historic paths we tread; mass routes, military routes, designed</i></p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<p><i>avenues, sheep walks and pedestrian links through the urban fabric, to the coast and into the mountains".</i></p> <p>It is considered appropriate to amend Policy Objective GIB17 to make greater reference to mass routes, given their historical importance and ability to provide recreational amenities into the future.</p> <p><b>Recommendation</b>  Amend Section 8.6.6 Policy Objective GIB17: Trails, Hiking and Walking Routes (p. 165)  From:  <i>"The forthcoming Heritage Plan (completion 2021), informs the Council's policies regarding the protection, and management of and access to heritage in the County".</i></p> <p>To:  <i>"The forthcoming Heritage Plan 2021 - 2025, will inform the Council's policies regarding the protection, and management of and access to heritage in the County".</i></p> <p>Insert a new sentence at the end of the Policy Objective as follows:</p> <ul style="list-style-type: none"> <li>• <i><u>Other trails in the County include routes such as mass paths, which were historic routes used to access mass in penal times. The Draft Dún Laochaire-Rathdown Heritage Plan 2021-2025 contains an action to map historic paths including mass paths and it is an objective of the Council to preserve mass paths throughout the County where possible.</u></i></li> </ul>
<b>3.8.6: Section 8.7 Biodiversity</b>			
<b>3.8.6.1: Policy Objective GIB18: Protection of Natural Heritage and the Environment</b>			
i) Submission requests that Kilgobbin Road from Ballyogan Road to Stepside be designated a Special Area of Conservation (SAC).	<b>B0051</b>	9	<p>The Executive notes the issue raised.</p> <p>SACs are legally protected European sites, and these are designated for their importance in terms of EU Annex habitats and/or species. The proposal of SACs for designation falls under the remit of National Parks and Wildlife Service and requires that the site satisfies the criteria outlined in the European Habitats Directive. The procedure for designation does not lie with local authorities.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission welcomes policy 8.7.1.1. and considers that the Council must ensure that the wildlife habitats at Marlay Demesne be protected and considers that all information regarding the environment should be publicly available as is required under the Aarhus Convention.</p> <p>Request a Bat Policy to protect bats and to encourage their roosting opportunities (references Marlay Park).</p>	<b>B0052</b>	5	<p>The Executive welcomes the support provided and also notes the issues raised.</p> <p>All the information regarding the ecology of Marlay Park is publicly available on the DLR website. Several ecological assessments and monitoring reports have been carried out by Scott Cawley Ltd including bats. All records of bats in Marlay are noted in those reports including a full assessment of potential significant impacts on bats which have concluded no significant impacts on bats.</p> <p>DLR work in collaboration with the 'Dublin Bat Group' and carry out bat surveys annually for example most recently in Fernhill Park and Gardens.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submission states that having to rely on private gardens for pollinators etc. is ineffective. There must be more preserved and better (un)managed green space.</p>	<b>B0063</b>		<p>The Executive notes the issue raised.</p> <p>An Objective of the Plan is to actively support the aims and objectives of the All-Ireland Pollinator Plan 2020 - 2025 by encouraging measures to protect and increase the population of bees and other pollinating insects in DLR.</p> <p>DLR are partners of the All-Ireland Pollinator Plan. Our Parks section along with the cooperation of the public and resident groups have allocated over 180 pollinator areas within our parks, on our verges and in green spaces of residential areas. These are managed annually for pollinators. DLR have a number of wildflower meadows in their parks such as Marlay, Cabinteely, Shanganagh and Fernhill. DLR also have a policy of eliminating pesticide use and are using alternatives to chemicals such as hot foam for weed control to help our environment including pollinators.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Submissions:</p>	<b>B0539</b> <b>B1171</b>		<p>The Executive notes the issues raised.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<ul style="list-style-type: none"> <li>Consider that too many lands have been over developed without consideration for the natural environment and that the Plan should manage any loss of habitat.</li> <li>Request that natural habitats of protected wildlife, and native wooded areas should be taken into consideration.</li> <li>Preserve and reinstate green corridors for fauna &amp; wildlife biodiversity and include periodic audits of areas of interest.</li> </ul>	<b>B1174</b>		<p>DLR will promote the concept of gains for biodiversity, where possible.</p> <p>The Ecological Network map which forms part of the development plan has been prepared based on existing studies and knowledge. Further studies and knowledge will emerge over the lifetime of the County Development Plan which will highlight important areas for wildlife, native wooded areas that form part of the County's wildlife corridors and locally important areas. Whilst it had been anticipated that the wildlife corridors could be included in the Draft Plan work is not yet completed. The completed work will, however, feed into the forthcoming Biodiversity Action Plan, the review of the GI Strategy and forthcoming Local Area Plans. It is recommended that the Draft Plan be updated in this regard. In addition, it is also noted that the Cherrywood Planning Scheme areas is subject to some separate objectives contained in the approved scheme. The supplementary map should show the Cherrywood area greyed out similar to other County Plan maps.</p> <p><b>Recommendation</b></p> <p>Amend Section 8.7.1.5 as follows: Omit the following (p. 171): <i>It is envisaged that the forthcoming wildlife corridors will also be depicted in Supplementary Map B1</i></p> <p>And, Amend Section 8.7.1.6 Policy Objective GIB23: County Wide Ecological Network (p. 172) as follows:</p> <p>Amend Supplementary Map B2 as follows: Omit <i>Note: The map will be updated at amendment stage with data from the forthcoming wildlife corridor plan</i></p> <p>Add a note as follows: <i>This map is indicative only and does not purport to show all occurrences of ecologically sensitives sites. Locally Important Biodiversity Sites (LIBS) do not have a legal status.</i></p> <p><i>Show the Cherrywood Planning Scheme area greyed out.</i></p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<i>Update open spaces to show Beckett and Ticknick Park.</i>
v) Submissions request the protection of the following: <ul style="list-style-type: none"> <li>• The wildflower meadows with a variety of orchids at Ballycorus Roadstone area.</li> <li>• Dingle Glen and Ballycorus.</li> </ul>	<b><u>B0475</u></b> <b><u>B0847</u></b> <b><u>B0985</u></b> <b><u>B1165</u></b>	9	<p>The Executive notes the issues raised.</p> <p>The Draft County Development Plan includes a Specific Local Objective 83 <i>"To protect the calcareous wetland at Kingston, Kiltiernan"</i>. This includes the Roadstone area. This specific objective should be edited to include the 'orchid rich meadows'.</p> <p>The roadstone quarry is an old quarry that has been regraded ('restored') and now is leased to a farmer for grazing. The tufa springs and orchid meadow are part of this regraded land which has been developed, with a power line running over. Therefore, it would not impact Roadstone anyway. Roadstone is not an operational/active quarry.</p> <p>Dingle Glen is a proposed Natural Heritage Area pNHA and is protected at County level.</p> <p><b>Recommendation</b>  Amend Specific Local Objective 83 as follows:  <i>"To protect the calcareous wetland at Kingston, Kiltiernan"</i>.</p> <p>To:  <i>" To protect the mosaic of habitats of the calcareous wetland and orchid grassland at Kingston/Ballycorus, Kiltiernan"</i>.</p>
vi) Submissions request: <ul style="list-style-type: none"> <li>• The protection of trees and hedgerows on Ballybride Road, Ferndale Road to Rathmichael Woods and Carrickgollogan.</li> <li>• The protection of flora and fauna including hedgerows and trees.</li> <li>• Developments should retain existing trees and hedgerows and incorporate biodiversity friendly elements and using native species.</li> </ul>	<b><u>B0542</u></b> <b><u>B0733</u></b> <b><u>B0737</u></b> <b><u>B0740</u></b> <b><u>B1199</u></b> <b><u>B1220</u></b> <b><u>B1247</u></b>	10	<p>The Executive notes the issues raised. Important stands of trees are identified on the Draft Plan maps by way of tree symbols and there are a number of such symbols shown at various locations on the Ballybride Road, Ferndale Road to Rathmichael Woods, Carrickgollogan and Kiltiernan, Shankill and Old Connaught.</p> <p>Policy Objective GIB18: Protection of Natural Heritage and the Environment, of the Draft Plan states that it is a Council Policy Objective to protect and conserve the environment including, in particular, the natural heritage of the County and to conserve and manage Nationally and Internationally important and EU designated sites - such as Special Protection Areas (SPAs), Special Areas of Conservations (SACs), proposed Natural Heritage Areas (pNHAs) and Ramsar sites (wetlands) - as well as non-designated areas of high nature conservation value known as</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<p>locally important areas which also serve as 'Stepping Stones' for the purposes of Article 10 of the Habitats Directive.</p> <p>The Ecological Network map which forms part of the development plan will be updated to highlight important areas for wildlife, native wooded areas that form part of our wildlife corridors and locally important areas.</p> <p>Policy Objective OSR7: Trees, Woodland and Forestry, within Chapter 9 of the Draft Plan states that <i>"it is a Policy Objective to implement the objectives and policies of the Tree Policy and the forthcoming Tree Strategy for the County, to ensure that the tree cover in the County is managed, and developed to optimise the environmental, climatic and educational benefits, which derive from an 'urban forest', and include a holistic 'urban forestry' approach"</i>.</p> <p>Section 12.8.11, 'Existing Trees and Hedgerows', provides guidance with respect to new development and the preservation of trees and woodlands. Future Local area plans for these areas will also address the issue.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>vii) Submission requests that an objective be added to reflect the importance of the River Slang as an ecological habitat. The objective <i>"To protect and preserve Trees and Woodland"</i> should also be assigned.</p>	<p><b>B1125</b></p>	<p>1</p>	<p>The Executive notes the issue raised.</p> <p>All of the rivers are recognised as important wildlife corridors in the Ecological Network Map and are recognised under Policy Objective GIB18 and are listed in Appendix 10 – Ecological Network of the Draft Plan.</p> <p>It is also noted that the implementation of Policy Objective GIB18 will involve:</p> <ul style="list-style-type: none"> <li>• Protection of existing woodlands, trees and hedgerows which are of amenity or biodiversity value and/or contribute to landscape character, including those listed under Tree Protection Orders (TPOs) and ensure that proper provision is made for their protection and management.</li> </ul> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
viii) Submission suggests various relocation of text within Policy Objective GIB18, relocation of some elements into other Policy Objectives in Chapter 8 and relocation of some elements into other Chapters.	<b>B0594</b>		<p>The Executive notes the issue raised.</p> <p>The existing Policy Objective GIB18: Protection of Natural Heritage and the Environment, is robust and comprehensive and gives significant Council commitment to protect and conserve the environment including, in particular, the natural heritage of the County and to conserve and manage Nationally and Internationally important and EU designated sites.</p> <p>The policy states that the implementation of GIB18 will involve inter alia a thrust of associated objectives and guidelines. The suggested relocation of text is confusing and is not warranted.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.8.6.2: Policy Objective GIB20: Biodiversity Plan</b>			
i) Submission notes that the planning for biodiversity and greening of urban spaces are of interest to the Sallynoggin Estate Management Forum, and the appointment of a biodiversity officer on the Estate Management Forum should be noted.	<b>B0326</b>	7	<p>The Executive notes the issue raised. This is a very welcome addition to the forum and DLR are happy to liaise with the Sallynoggin Estate Management biodiversity officer through the DLR Biodiversity Officer. <b>This is, however, not a County Development Plan issue.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
ii) An Taisce welcomes the inclusion of the EU Biodiversity Strategy for 2030 in the Draft Plan and in the forthcoming DLR County Biodiversity Action Plan 2021-2026. The submission recommends that the relevant objectives in the EU Strategy's 14 points be incorporated into the Action Plan.	<b>B0794</b>		<p>The Executive welcomes the support provided. DLR note the issues raised by An Taisce in their submission, these will be considered in the forthcoming DLR Biodiversity Action Plan.</p> <p>It is noted that the Policy Objective wording associated with GIB:20 references that <i>“the implementation of the current DLR County Biodiversity Action Plan has resulted in the completion of a number of projects/studies that have increased the overall level of knowledge, awareness and understanding of the biodiversity of the County. These projects/studies are listed in Appendix 3, and have been used to produce the DLR Ecological Network Map (Refer to Supplementary Map B1)”</i></p> <p>However, the Ecological Network is contained within Appendix 10 of the Draft Plan.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
			<p>Amend associated text of Section 8.7.1.3 of the Policy Objective GIB18: Protection of Natural Heritage and the Environment (p. 169), from:</p> <p><i>“The implementation of the current DLR County Biodiversity Action Plan has resulted in the completion of a number of projects/studies that have increased the overall level of knowledge, awareness and understanding of the biodiversity of the County. These projects/studies are listed in <del>Appendix 3</del>, and have been used to produce the DLR Ecological Network Map (Refer to Supplementary Map B1)”</i>,</p> <p>To...</p> <p><i>“The implementation of the current DLR County Biodiversity Action Plan has resulted in the completion of a number of projects/studies that have increased the overall level of knowledge, awareness and understanding of the biodiversity of the County. These projects/studies are listed in <u>Appendix 10</u> and have been used to produce the DLR Ecological Network Map (Refer to Supplementary Map B1)”</i>.</p>
<p>iii) The submission notes that given the likely scale of new development and the requirement to prioritise brownfield and infill sites, and therefore, recommends incorporating a requirement for biodiversity audits on brownfield sites into the new Biodiversity Action Plan.</p>	<p><b><u>B0271</u></b></p>		<p>The Executive notes the issue raised.</p> <p>DLR note the request for biodiversity audits on brownfield sites in the forthcoming DLR Biodiversity Action Plan. Section 12.1.2.3 of the Draft Plans set out the new requirement for An Ecological Impact Assessment which may be required to be submitted with any proposed development should the Planning Authority consider that there is potential to impact upon an environmentally sensitive area such as a wildlife corridor, a site adjoining or adjacent to a proposed National Heritage Area, along the coastline or a river.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Submission relates to Shankill and requests that a Biodiversity Officer should be appointed to oversee the development of Shankill so as to create a vision for Shankill in a holistic and biodiversity and carbon secure way.</p> <p>Submission also considers that there is a need for the creation of Designated Areas of Local Biodiversity within Shankill.</p>	<p><b><u>B0314</u></b></p>	<p>10</p>	<p>The Executive notes the issue raised.</p> <p><b>Appointment of staff is an operational matter.</b> The implementation of the current DLR County Biodiversity Action Plan has resulted in the completion of a number of projects/studies that have increased the overall level of knowledge, awareness and understanding of the biodiversity of the County. These projects/studies are listed in Appendix 3, and have been used to produce the DLR.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<p>Ecological Network Map (Refer to Supplementary Map B1). The Ecological Network Map visually demonstrates the ecological network that currently exists across the County. The Council will undertake necessary ecological surveys, and update the habitat and species mapping for the County.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>v) Submission requests that the biodiversity of the Central Mental Hospital is recognised in the plan and suggests that a SLO could be applied in this regard.</p>	<b>B0529</b>	1	<p>The Executive notes the issue raised but would not concur that an SLO is required to address the biodiversity on the CMH site over and above any other site in the County.</p> <p>The requirement of the plan in relation to biodiversity including the new requirements for an Ecological Impact Assessment are set out in detail in Chapter 8 and Chapter 12. Biodiversity on the site will be dealt with at planning application stage.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>vi) Submission requests an independent assessment of the Codling and Kish sandbanks (it is not entirely clear what area is being referred to in the submission, however it is taken to be the sandbanks).</p>	<b>B0630</b>		<p>The Executive notes the issue raised.</p> <p><b>The Codling and Kish sandbanks falls beyond the jurisdiction of the County and any assessment is not a County Development Plan issue.</b></p> <p>DLR's County Biodiversity Action Plan in draft contains actions related to the collation of biodiversity data, including our marine habitats. The Council aims to carry out a study of marine ecosystems and develop marine ecosystem restoration projects with our Biosphere Partners, and also work with Government Departments, and the public in relation to the designation of Marine Protected Areas.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>vii) Submission requests</p> <ul style="list-style-type: none"> <li>• Inclusion of a policy on no net biodiversity loss</li> </ul>	<b>B1155</b>		<p>The Executive notes the issue raised.</p> <p>The issue of no net biodiversity loss is an important and evolving policy area which will feed into future biodiversity policy. However, the methodologies and guidelines as to how this</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<ul style="list-style-type: none"> <li>• Explicit policy on biodiverse ecosystems and that impact of of infill developments in residential areas on biodiverse ecosystems is given due consideration in granting planning approval.</li> <li>• Protection of rivers, woodlands, hedgerows, meadows.</li> <li>• Encouragement of widespread tree planting</li> </ul>			<p>would be incorporated into a County Development Plan are not yet available. Protection of rivers, woodlands, hedgerows, meadows are covered in various Policy Objectives set out in Chapters 3, 8 and 9 of the Draft Plan. Impact of development on biodiversity is addressed at application stage via ecological assessment. The requirement for same is set out in Chapter 12 of the Draft Plan.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<b>3.8.6.3: Policy Objective GIB21: Designated Sites</b>			
<p>i) Submission requests that Kilgobbin Road from Ballyogan Road to Stepside be designated a Special Area of Conservation (SAC).</p>	<b><u>B0051</u></b>	9	<p>The Executive notes the issues raised.</p> <p>The Council has no role whatsoever in the designation of SACs. The National Parks and Wildlife Service are statutorily charged with responsibility in relation to identifying and designating Natural Heritage Areas.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Inland Fisheries Ireland (IFI) suggests that new forestry developments, except for broadleaf, would be discouraged in proposed/candidate and adopted NHAs, SACs and SPAs, in water quality and fisheries sensitive areas". This would apply to forestry's in the plan area such as Ticknock forest, Three and Two Rock Mountains and Glencullen.</p>	<b><u>B0131</u></b>		<p>The Executive notes the issue raised.</p> <p>Large tracts of coniferous forestry in the County are primarily, but not always, in the ownership and control of Coillte. Those at Ticknock forest, Three and Two Rock Mountains and Glencullen would be in the control of Coillte. The subject matter contained in the submission is effectively an operational and management issue for Coillte (and other landowners as appropriate) and is not a strategic County Development Plan matter. The new Coillte Nature Initiative is committed to and is dedicated to the restoration, regeneration and rehabilitation of nature is noted.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submission suggests that the Council ensure that development in the area of Booterstown Marsh is carried out in accordance with Habitats and Birds Directives principles and obligations.</p>	<b><u>B0794</u></b>		<p>The Executive notes the issue raised.</p> <p>As per Policy Objective GIB21: Designated Sites with respect to Nationally Protected Areas, the Council will normally only grant permission where it is clearly demonstrated that a proposal</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<p>will have no significant adverse impact on the habitats, and species of interest in the designated area, and its ecological integrity.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Submission suggests that the first sentence of Policy Objective: GIB21 Designated Sites should be reworded with suggested policy wording. The submission also requests that the second sentence should be replaced with several suggested additional Policy Objectives.</p> <p>Submission also suggests additional policy with respect to Natura Sites, NHAs, Ramsar Sites, Statutory Nature Reserves, Biogenetic Reserves, and Wildfowl Sanctuaries.</p>	<b>B0594</b>		<p>The Executive notes the issue raised.</p> <p>A number of issues raised are already covered in Chapter 8 and noted in Policy Objective GIB:21 Designated Sites. Additionally, the forthcoming County's Wildlife Corridor Plan and the forthcoming Biodiversity Plan will note these issues. In this context a further policy, as proposed by the submission, is not warranted.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>v) Submission state that the pNHA designation for the soft sedimentary cliffs south of the Shanganagh River as far as the County Boundary with Wicklow has been removed in this Draft Plan, with no explanation. Submission requests that consideration be given to appropriate designation of the Shanganagh Cliffs, which are subject to serious coastal erosion, particularly in the area from Corbawn to Woodbrook.</p>	<b>B0630</b> <b>B1155</b>	10	<p>The Executive notes the issue raised.</p> <p>The "<i>soft sedimentary cliffs south of the Shanganagh River</i>", is not listed as a pNHA in the 2016 Dún Laoghaire-Rathdown County Development Plan and, therefore, there has been no change in the Draft Plan. The area to the north is shown in the Draft Plan and was shown in the 2016 Maps.</p> <p>In any event, all pNHA designations are determined by NPWS and the County Development Plan maps reflect the most up to date information from NPWS, which does not include the designation referred to. Information on pNHAs can be obtained from the NPWS website at <a href="https://www.npws.ie/protected-sites/nha">https://www.npws.ie/protected-sites/nha</a>.</p> <p>The Geological Survey of Ireland (GSI) is compiling a list of geological/geomorphological sites in need of protection through NHA designation. A committee of expert geologists provides an initial list of sites which then undergo a process of survey, reporting and review, to provide recommendations regarding NHA status or otherwise. The GSI has completed its list of karst (i.e. exposed limestone) and early fossil sites. NPWS will be able to clarify any changes to those designations.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.8.6.4: Policy Objective GIB22: Non-Designated Areas of Biodiversity Importance</b>			
<p>i) Submission is hopeful that Marlay would provide suitable locations for the Swift boxes proposed in the Draft Plan.</p>	<b>B0052</b>	5	<p>The Executive notes the issue raised.</p> <p>The Council will continue to support swift species and other important bird species through the encouragement of the provision of swift nest boxes in development(s), with advice from Swift Conservation Ireland and will consider Marlay for the inclusion of swift boxes.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission refers to the Coastal amenity area, and the embankment, that lies to the east of Bayview Estate, Killiney Hill Road, which encompasses many habitats with considerable biodiversity.</p> <p>The Shanganagh River is now included in the "Dublin Urban River Enhancement Project" which should bring restorative benefits.</p> <p>The public amenity space lacks a formal designation for biodiversity and protection, it is an important wildlife corridor and 'buffer zone' and merits particular protection.</p>	<b>B0630</b>	10	<p>The Executive notes the issue raised.</p> <p>Policy Objective GIB22: Non-Designated Areas of Biodiversity Importance states that, <i>"It is a Policy Objective to protect and promote the conservation of biodiversity in areas of natural heritage importance outside Designated Areas and to ensure that notable sites, habitats and features of biodiversity importance - including species protected under the Wildlife Acts 1976 and 2000, the Birds Directive 1979, the Habitats Directive 1992, Flora (Protection) Order, 2015, Annex I habitats, local important areas, wildlife corridors and rare species - are adequately protected. Ecological assessments will be carried out for all developments in areas that support, or have potential to support, features of biodiversity importance or rare and protected species and appropriate mitigation/avoidance measures will be implemented. In implementing this policy, regard shall be had to the Ecological Network, including the forthcoming DLR Wildlife Corridor Plan, and the recommendations and objectives of the Green City Guidelines (2008) and 'Ecological Guidance Notes for Local Authorities and Developers' (Dún Laoghaire-Rathdown Version 2014)".</i></p> <p>The Council notes that, <i>"the biodiversity of DLR is not just contained within specifically Designated Areas but is found throughout the County. Many areas that do not have formal protection under legislation still possess a level of natural heritage importance, which needs to be recognised and protected, where possible. These areas include woodlands, wetlands, semi-</i></p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
			<p><i>natural grasslands, hedgerows, trees, rivers, streams, private gardens, and other urban green spaces”.</i></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submission notes that given the likely scale of new development and the requirement to prioritise brownfield and infill sites, recommend incorporating a requirement for biodiversity audits on brownfield sites into the new Biodiversity Action Plan.</p> <p>Submission refers to lands at Clonkeen College being used by Brent geese.</p>	<p><b><u>B0208</u></b> <b><u>B0271</u></b></p>		<p>The Executive notes the issue raised. The exact content of the forthcoming Biodiversity Plan is a matter separate to the County Development Plan.</p> <p>Notwithstanding there is a new section in Chapter 12 (Section 12.1.2.3), which relates to the requirement for Ecological Impact Assessments.</p> <p>It has come to the attention of the Executive that Policy Objective GIB22: Non-Designated Areas of Biodiversity Importance should be updated to include reference to the 2011 ‘<i>Birds and Habitats Regulations</i>’.</p> <p><b>Recommendation</b> Amend Section 8.7.1.5 Policy Objective GIB22: Non-Designated Areas of Biodiversity Importance (p. 171) from: <i>“It is a Policy Objective to protect and promote the conservation of biodiversity in areas of natural heritage importance outside Designated Areas .....including species protected under the Wildlife Acts 1976 and 2000, the Birds Directive 1979, the Habitats Directive 1992,.....”</i></p> <p>To: <i>“It is a Policy Objective to protect and promote the conservation of biodiversity in areas of natural heritage importance outside Designated .....including species protected under the Wildlife Acts 1976 and 2000, the Birds Directive 1979, the Habitats Directive 1992, <u>Birds and Habitats Regulations 2011.....”</u></i></p>
<b>3.8.6.5: Policy Objective GIB23: County-Wide Ecological Network</b>			
<p>i) Submissions:</p> <ul style="list-style-type: none"> <li>Request that the Plan include a specific objective to protect wildlife corridors throughout the County.</li> </ul>	<p><b><u>B0111</u></b> <b><u>B0156</u></b> <b><u>B0157</u></b> <b><u>B0306</u></b> <b><u>B0342</u></b> <b><u>B0795</u></b></p>	<p>5</p>	<p>The Executive notes the issues raised.</p> <p><b>Many of the items are very detailed operational and site-specific issues relating to roads projects and planning applications and are not County Development Plan issues.</b> Fitzsimons Wood is already shown on the County Development Plan maps as a pNHA. DLR supports and recognises the importance of Wildlife Corridors, Green Infrastructure (GI) and green</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<ul style="list-style-type: none"> <li>• Express concern with respect to the protection of the area around Ticknock, Woodside, Blackglen, and in particular, Fitzsimons Wood.</li> <li>• With development proposed in the area submission requests a wildlife corridor from Fitzsimons Wood towards the Woodside-Ticknock area, possibly requiring the installation of a 'green bridge' across the Blackglen Road when it is upgraded.</li> </ul> <p>Request that the following be included in the Draft Plan:</p> <ul style="list-style-type: none"> <li>• A clear map showing the Wildlife Corridor from Three Rock Mountain to Fitzsimons Wood.</li> <li>• Clarification as to how Deer will be able to cross the widened Blackglen Road.</li> <li>• Confirmation that the widened Blackglen Road will allow Badgers to cross via a tunnel or culvert.</li> <li>• Confirmation that any planning permissions for development along Blackglen Road will make provision for the proposed Wildlife Corridor.</li> <li>• Fitzsimons Wood designated a Natural Heritage Area (NHA).</li> </ul>	<p><b><u>B0838</u></b>  <b><u>B0851</u></b>  <b><u>B0854</u></b>  <b><u>B0866</u></b>  <b><u>B0983</u></b>  <b><u>B1009</u></b>  <b><u>B1070</u></b>  <b><u>B1122</u></b>  <b><u>B1247</u></b></p>		<p>initiatives. The biodiversity officer is currently developing a Wildlife Corridor Plan of the County, which will be integrated into the GI strategy and align with the forthcoming Biodiversity Plan. DLR are currently reviewing their habitat mapping including the coastal habitats, which were mapped in 2008.</p> <p><b>Recommendation</b>  No change to Draft Plan.</p>
<p>ii) Submissions:</p> <ul style="list-style-type: none"> <li>• Welcomes work the Council are doing with respect to the completion of a Wildlife Corridor Plan for the County.</li> <li>• Suggests that Natural habitats of protected wildlife, and native wooded areas should be taken into consideration.</li> </ul>	<p><b><u>B0342</u></b>  <b><u>B1171</u></b></p>		<p>The Executive welcomes the support provided.</p> <p>The forthcoming Wildlife Corridor Plan will also inform the Ecological Network Map.</p> <p><b>Recommendation</b>  No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
iii) Submission states that the importance of Killiney Beach should be recognised and the Map B1 of the Ecological Network also extended to cover the area of Killiney Bay.	<b>B1197</b>	7 10	<p>The Executive notes the issue raised.</p> <p>The Ecological Network Map visually demonstrates the ecological network that currently exists across the County. The Council will undertake necessary ecological surveys, and update the habitat and species mapping for the County during the lifetime of the Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.8.6.6: Policy Objective GIB24: Rivers and Waterways</b>			
i) Submission suggests new wording for Policy Objective GIB24: Rivers and Waterways. It also suggests that the first paragraph and first sentence should be merged with the Policy Objective.  The Policy Objective should also include a Table of Existing or potential riverside walks/cycle routes – similar to Kildare County Development Plan.  Several additional Policy Objectives are drafted for inclusion in this regard. Specifically with respect to the Dodder and The Slade Valley and to co-operate with adjoining Councils in developing a strategy and in the preparation of an Environmental Development Plan.	<b>B0594</b>		<p>The Executive notes the issues raised.</p> <p>It is considered that existing Policy Objective GIB24, is sufficiently robust and deliberately worded to achieve the aims of the Council with regard to Rivers and Waterways. Therefore, additional policies in this regard are neither required nor necessary.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
ii) Submissions: <ul style="list-style-type: none"> <li>• Request a survey of the biodiversity along the upland watercourses in the County.</li> <li>• Request that the County Development Plan must recognise that protection of the aquatic environment/habitat not only requires the protection of water quality but also necessitates the protection and maintenance of</li> </ul>	<b>B0131</b> <b>B0217</b>		<p>The Executive notes the issues raised.</p> <p>Policy Objective GIB24, states that the Council shall consult, as appropriate, with Inland Fisheries Ireland in relation to any development that could potentially impact on the aquatic ecosystems and associated riparian habitats, wildlife corridors and/or salmonid waters.</p> <p>The Policy Objective - by way of reference to the entire river and stream corridor - clearly recognises the need to protect the physical habitat and the hydrological regimes.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
physical habitat and hydrological processes/regimes.			No change to Draft Plan.
iii) IFI recommends that the Plan should include a clear policy on the use of clear span structures on fisheries waters and that IFI should be consulted on any such proposed developments.	<b><u>B0131</u></b>		<p>The Executive notes the issue raised.</p> <p>Policy Objective GIB24 provides guidance with respect to development proposals in riparian corridors. However, no guidance on river/stream crossing structures have been provided. It is considered reasonable to include an additional guidance note with respect to the use of clear span structures on fisheries waters and that IFI should be consulted on any such proposed developments.</p> <p><b>Recommendation</b>  Amend Section 8.7.1.7 of the Policy Objective GIB24: Rivers and Waterways (p. 174) by inserting a new sentence after third paragraph on page 174 as follows:  <i>"In terms of habitat loss, bridges and bottomless culverts have the least impact on fish passage and the use of clear span structures on fisheries waters should be considered in the design of river/stream crossing structures. Inland Fisheries Ireland (IFI) should be consulted on any such proposed developments".</i></p>
iv) Submission welcomes the commitments to riparian biodiversity buffer zones. Submission request a wider corridor with public access discouraged	<b><u>B0794</u></b> <b><u>B1155</u></b>		<p>The Executive welcomes the support provided.</p> <p>In relation to providing a wider corridor and discouraging public access to river corridors it is considered that proposed Policy Objective GIB 24 sets out an approach that allow for protection to be balanced with amenity use and public access.</p> <p><b>Recommendation</b>  No change to Draft Plan.</p>
<b>3.8.6.7: Policy Objective GIB26: Geological Sites</b>			
i) Submission commends the inclusion of geological sites as Policy Objective GIB26: Geological Sites and welcome the comment that DLRCC "will endeavour where appropriate, to encourage, facilitate and support access and public Rights-of Way to	<b><u>B0249</u></b>		<p>The Executive notes the issue raised and welcomes the support received.</p> <p>There are currently no NHAs designated for geology/geomorphological heritage in DLR so it is therefore not recommended that geological sites be included in GIB 21: Designated sites. They are also subject to their own separate policy. It is recommended that the Policy Objective on ROW be updated to include access to geological sites.</p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
<p><i>geological, and geomorphological features of heritage value.”</i></p> <p>Submission encourages the inclusion of County Geological Sites in objective GIB14: Public Rights-of-Way, Policy Objective GIB:18 Protection of Natural Heritage and the Environment and Policy Objective GIB:21 Designated Sites.</p>			<p><b>Recommendation</b>                      Amend Section 8.6.3 Policy Objective GIB14: Public Rights-of-Way (p. 163) as follows:</p> <p>Amend second bullet point from:</p> <p><i>“Extend or enhance existing rights-of-way either by agreement with landowners or using compulsory powers in the interest of ensuring access to amenities, including the coast, upland areas, riverbanks, heritage sites and National Monuments”.</i></p> <p>To:</p> <p><i>“Extend or enhance existing rights-of-way either by agreement with landowners or using compulsory powers in the interest of ensuring access to amenities, including the coast, upland areas, riverbanks, heritage sites, <u>geological sites</u> and National Monuments”.</i></p>
<p>ii) The submission suggests that the first phrase of Policy Objective: GIB26 Geological Sites should be replaced with suggested policy wording. Several additional Policy Objectives are drafted for inclusion in this regard. The last paragraph should be merged with proposed additional Policy Objective.</p>	<p><b>B0594</b></p>		<p>The Executive notes the issues raised.</p> <p>It is considered that existing Policy Objective GIB26, is sufficiently robust and deliberately worded to achieve the aims of the Council with regard to Geological Sites. Therefore, additional policies in this regard are neither required nor necessary.</p> <p><b>Recommendation</b>                      No change to Draft Plan.</p>
<p><b>3.8.6.8: Policy Objective GIB29: Nature Based Solutions</b></p>			
<p>i) Would urge DLRCC to instigate an enlightened policy of putting nature first when it comes to development – buildings should be designed to fit the existing landscape.</p>	<p><b>B0314</b></p>		<p>The Executive notes the issue raised.</p> <p>This issue is addressed under Section 8.7.1.12 Policy Objective GIB29: Nature Based Solutions, which states as follows:</p> <p><i>“It is a Policy Objective to increase the use of Nature Based Solutions (NBS) within the County, and to promote and apply adaption and mitigation actions that favour NBS, which can have multiple benefits to the environment and communities. NBS has a role not only to meet certain infrastructure related needs (e.g. flooding management), and development needs, but also to maintain or benefit the quality of ecosystems, habitats, and species”.</i></p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<p>In furtherance of the above Policy Objective, the DLR Biodiversity Officer will provide a set of guidelines and principles for the implementation of NBS for staff and various sectors involved in NBS. The Draft Plan also contains a range of measures for landscape protection, including the application of the Objective 'G' zoning <i>'To protect and improve high amenity areas'</i> in high amenity areas.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.8.6.9: Policy Objective GIB30: Promoting Biodiversity by avoiding Widespread Use of Herbicides and Pesticides</b>			
<p>i) The submissions welcome the following:</p> <ul style="list-style-type: none"> <li>• The objective of policy 8.7.1.13. In addition, the Council should adopt a 'No Mow' policy for its parks, green spaces, and road edges.</li> <li>• The actions of the DLR Parks Department, including stopping the use of toxic sprays and the re-wilding of park spaces.</li> </ul>	<p><b>B0052</b> <b>B0047</b></p>	<p>5</p>	<p>The Executive notes the issue raised and welcomes the support provided.</p> <p>DLR have reduced the use of herbicide and pesticides in public parks since 2018. DLR also have areas in parks that have been set aside for wildlife and pollinators. DLR Parks have a 'Slow to Mow' campaign to encourage the public to also create areas for pollinators and wildlife. DLR are partners of the All-Ireland Pollinator Plan and the Council's Biodiversity Officer is a member of the All- Ireland Pollinator Plan Steering Group. All these initiatives aim to support and protect biodiversity in the County.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.8.7: Other/Miscellaneous</b>			
<p>i) Irish Farmers Association (IFA) requests that the annual start-up date for hedge cutting is moved to 1<sup>st</sup> August.</p>	<p><b>B0302</b></p>		<p>The Executive notes the issue raised. This is outside of the remit of the Council and is <b>therefore, this is not a County Development Plan issue.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>



### 3.9: Chapter 9 - Open Space, Parks and Recreation

It should be noted that where something is identified as an *Operational issue/Not a County Development Plan issue* in the Chief Executive's response, this does not mean that the Executive does not support the sentiments of the issues raised or that the Draft Plan limits or preclude delivery of the operational service identified.

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<b>3.9.1: General.</b>			
i) Submission welcomes many elements including the tree mapping, the Policy Objectives outlined in Chapter 9 the new Open Space strategy, incorporation of the ecosystems services approach, along with climate considerations.	<b>B0052</b>		The Executive welcomes the support provided.  <b>Recommendation</b> No change to Draft Plan.
ii) Submission suggests that Chapter 9 could acknowledge the cultural use of open spaces.	<b>B1095</b>		The Executive notes the issue raised and agrees that our parks and open spaces also have a cultural role.  <b>Recommendation</b> <i>Amend Section 9.1 (p. 179) by inserting a new sentence after "Moreover, they are especially important for improving green infrastructure, biodiversity, and wildlife corridors", as follows:</i>  <i><u>"Parks and open spaces also have a cultural role".</u></i>
iii) Submission fully supports Policy Objectives OSR2, OSR4, OSR5, OSR8, OSR10.	<b>B0942</b>		The Executive welcomes the support provided.  <b>Recommendation</b> No change to Draft Plan.
<b>3.9.2: Section 9.2 Open Space and Parks</b>			
<b>3.9.2.1: Policy Objective OSR1: Open Space Strategy</b>			
i) Submission suggests that the management and maintenance of the woodlands, open space, and amenity area centred on St. Helen's House, Booterstown should be considered in the Plan.  The Council should complete a baseline inventory of the flora and fauna of the St. Helen's House,	<b>B0005</b>	2	The Executive notes the issue raised.  The Draft Plan indicates that the new Open Space Strategy will identify any changes needed to improve access to, and the quality of open spaces in the County. The Parks and Landscape Services Department maintain this area at St. Helens, and, as such <b>this is a local parks operational issue and not a County Development Plan issue.</b>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
Booterstown area and devise a Management Plan for the area.			<p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submissions:</p> <ul style="list-style-type: none"> <li>Highlight the lack of open space and access to existing open spaces.</li> <li>State that the Council need to ensure sufficient land is zoned for recreational purposes both within residential developments by way of private gardens, playing pitches and play areas and outside residential developments by way of adjacent parks, pitches, cycle paths, woodlands and other walkways.</li> <li>green areas should be preserved and maintained for future generations.</li> <li>Raise concerns that intensive development would result in the loss of many green spaces throughout Dalkey.</li> <li>Requests that more walking recreation places area provided around the apartments and houses on the Glenamuck Road.</li> </ul>	<p><u><b>B0181</b></u> <u><b>B0521</b></u> <u><b>B0711</b></u> <u><b>B0730</b></u> <u><b>B0818</b></u> <u><b>B0890</b></u> <u><b>B1199</b></u></p>		<p>The Executive notes the issues raised.</p> <p>The Draft Plan indicates that the new Open Space Strategy will build on the existing Park Master Plan Programme and will identify deficiencies with the intention to acquire land – subject to resources. Strategic Housing Developments (SHD) schemes will be required to comply with the new open space requirements as set out in the County Development Plan. The Draft Plan ensures that existing green parks and open spaces are protected from intensive development by way of zoning, with these lands specifically denoted by the land use Objective 'F' – <i>“To preserve and provide for open space with ancillary active recreational amenities”</i>.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submissions request that that Council should:</p> <ul style="list-style-type: none"> <li>Increase the extent of public spaces available and continue to enhance facilities.</li> <li>Establish amenities for all intended development as existing not sufficient.</li> <li>Preserve and enhance our valuable public spaces and provide more facilities for kids and teenagers.</li> <li>Give more priority in the Plan to green spaces and facilities.</li> <li>Include plans to increase litter management and recycling in parks.</li> </ul>	<p><u><b>B0052</b></u> <u><b>B0061</b></u> <u><b>B0180</b></u> <u><b>B0247</b></u> <u><b>B0435</b></u> <u><b>B0720</b></u> <u><b>B0724</b></u> <u><b>B0725</b></u> <u><b>B0737</b></u> <u><b>B0745</b></u> <u><b>B0754</b></u> <u><b>B0796</b></u> <u><b>B0802</b></u> <u><b>B0818</b></u></p>		<p>The Executive notes the issues raised.</p> <p>It is a Policy Objective to provide a hierarchy of attractive parks and public open spaces, which vary in size and nature, are all inclusive, by being readily accessible and at a convenient distance from people's home and/ or places of work.</p> <p>Any deficiencies that exist will be identified in the Parks Master Plan Programme. The forthcoming Play strategy will address requirements for playgrounds.</p> <p><b>Litter management, dog fouling, the cleaning of parks, recycling in parks and opening hours are all Parks operational matter and are not County Development Plan issues.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<ul style="list-style-type: none"> <li>• Provide more wildlife areas, seating, picnic tables, water refill stations, outdoor classrooms, and natural play.</li> <li>• Clean up parks more regularly.</li> <li>• Deal with anti-social behaviour in parks.</li> <li>• Provide more open space and playgrounds are provided locally, for example in Redesdale estate and at Mullens field.</li> <li>• Provide more play areas, outdoor gyms, picnic facilities and safe seating.</li> <li>• Dog waste should be moved to the undergrowth and used as a natural fertilizer.</li> <li>• Ensure accessibility to open spaces at all times throughout the year.</li> <li>• Provide more exercise equipment in parks (Fernhill is commended).</li> <li>• Protect the existing green spaces throughout the County.</li> </ul>	<p><b><u>B1059</u></b> <b><u>B1195</u></b></p>		
<p>iv) Submissions:</p> <ul style="list-style-type: none"> <li>• Request more open space in specific areas including Windy Arbour, Kiltiernan/Glenamuck, Old Connauaght (Suggest that that Festina lente serves as focal point), Stepside (Fernhill is welcomed).</li> <li>• Welcomes the fact that the current Open Space Strategy (written in 2011) is to be reviewed.</li> <li>• Request that all existing green amenity space will be the subject of an audit and that the Council will engage with residents to bring forward proposals for fuller uses of green amenity spaces.</li> </ul>	<p><b><u>B0137</u></b> <b><u>B0271</u></b> <b><u>B0450</u></b> <b><u>B0549</u></b> <b><u>B0761</u></b></p>		<p>The Executive notes the issues raised.</p> <p>Section 9.2.1.1 of the Draft Plan, Policy Objective OSR1: Open Space Strategy states that, <i>“it is a Policy Objective of the Council to review the existing Open Space Strategy, 2012-2015 and to support the objectives of any new Open Space Strategy prepared within the lifetime of this Plan”</i>.</p> <p>The existing Open Space Strategy examines open space resources in existing communities, and how the needs of communities are being met. The strategy identifies any changes needed to improve access to, and the quality of open spaces in the County. The new Open Space Strategy will incorporate the ecosystems services approach, along with climate change considerations, and will build on the existing Parks Master Plan Programme. In areas where deficiencies have been identified, it is the intention of the Council to acquire land - as opportunities arise and resources permit - to remedy such deficiencies. This is all set out in the Draft Plan (p. 179).</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.9.2.2: Policy Objective OSR2: Hierarchy of Parks and Open Space</b>			
<p>i) Submission considers that there are limited wildlife zones in the County Parks such as Marley and Balawley and considers that thin strips along rivers such as the Slang are completely inadequate for biodiversity and health.</p>	<b>B0063</b>		<p>The Executive notes the issue raised.</p> <p>The Executive would not concur with the issue raised as the Council places considerable emphasis on biodiversity and wildlife corridors particularly through the work of the biodiversity officer. The Draft Plan acknowledges that open spaces and parks are a vital part of Dún Laoghaire-Rathdown, they improve green infrastructure, biodiversity, and wildlife corridors. The strategic vision of the Plan in relation to GI, Landscape, and Biodiversity recognises the importance of the County's green infrastructure, landscape, and biodiversity, which can aid the eco-systems services approach address the challenge of climate change.</p> <p>The Council will aim to protect and enhance important open spaces and parks to provide a wider range of benefits for the County through the Policy Objectives contained in Chapter 8 'Green Infrastructure and Biodiversity' and Chapter 9 'Open Space, Parks and Recreation'.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission queries why are there so many parks in DLCOCO that are mostly barren from any carbon sequestering plants?</p>	<b>B1206</b>		<p>The Executive notes the issue raised but would not concur.</p> <p>Whilst not a County Plan issue, the Parks Department have a very successful 'Slow to Mow' campaign to encourage the public to also create areas for pollinators and wildlife. DLR are partners of the All – Ireland Pollinator Plan, and the Council's Biodiversity Officer is a member of the All – Ireland Pollinator Plan Steering Group. All these initiatives aim to support and protect biodiversity in the County.</p> <p>The parks in the County are catering for all. All plants have a carbon sequestering function including grass, trees, and woodland. Some sequester more than others. The forthcoming DLR Tree Strategy will address this issue, and will maximise tree cover, wherever possible.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
iii) Submissions: <ul style="list-style-type: none"> <li>Expresses concern in relation to the new park proposed in Kiltiernan.</li> <li>Consider that there is a need for green space in the Kiltiernan/Glenamuck area.</li> <li>Consider that the Planned green area in Kiltiernan is too small, poorly located between major roads, attenuation pond and next to 220kv power lines.</li> </ul>	<u>B0475</u> <u>B0743</u> <u>B0756</u> <u>B0797</u> <u>B0847</u> <u>B0985</u> <u>B1056</u> <u>B1126</u> <u>B1171</u>	9	<p>The Executive notes the issue raised.</p> <p>The site for the planned new open space area in Kiltiernan is zoned open space and the Parks and Landscape Services Department have commissioned the site and are liaising with landscape architects on the design. The finalised plan, whilst a detailed issue and <b>not a County Development Plan issue</b>, includes a network of pedestrian paths, linkages, water feature, a play facility and a corridor of open space linking with Jamestown and Dingle Glen.</p> <p>It is acknowledged that the pylons create some challenges. The Council has endeavoured in the past to work with the statutory providers to locate the pylons underground, however this was not successful. Notwithstanding this, it is considered that the challenged created in this regard, can be overcome through good design.</p> <p>In terms of the wider area the future Jamestown Park will provide for an additional facility.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
iv) Submission highlights the importance of green space and public right of way trails for apartment residents. In this regard, outdoor spaces should be kept freely accessible to all.	<u>B1113</u>		<p>The Executive notes the issue raised and would concur that access to outdoor space, parks and permeability links and are important for both apartment dwellers and indeed for all residents in the County.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
v) Submissions highlight the lack of provisions to improve the open space at Clonkeen park and considers that due to increased cycle traffic the cycle way through this space has become dangerous for young children to play.	<u>B0055</u> <u>B0080</u>	7	<p>The Executive notes the issues raised.</p> <p>Clonkeen Park will be part of the Kilbogget Park Masterplan. A new Play Space Policy is currently being progressed by the Council, and this will address future provision of playgrounds.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
vi) Submission states that Wayside Celtic is privately owned and considers that to show these lands as public open space is misleading (Kiltiernan).	<u>B0847</u>	9	<p>The Executive notes the issue raised but would not concur.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<p>The definition of open space as set out in the Draft Plan is as follows (underlining added for emphasis):</p> <p><i>“Open Space Open space is a parcel of land in a predominantly open and undeveloped condition that is suitable for the following:</i></p> <ul style="list-style-type: none"> <li>• <i>Outdoor and indoor sports facilities and cultural use - <u>owned publicly or privately</u>, and with natural or artificial surfaces including tennis courts, bowling greens, sports pitches, golf courses, athletic tracks and playing fields.</i></li> <li>• <i>Amenity green space - often around housing - including formal recreational spaces.</i></li> <li>• <i>Provision for community play areas including playgrounds, skateboard parks and outdoor basketball hoops.</i></li> <li>• <i>Green corridors. M Natural Areas.</i></li> <li>• <i>Community gardens.</i></li> <li>• <i>Wildlife and native plant habitats”.</i></li> </ul> <p>It is clear that the lands in question meet the definition of open space.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>vii) Submissions request that:</p> <ul style="list-style-type: none"> <li>• Open spaces should be considered destinations along the general cycle network.</li> <li>• Barriers and kissing gates that preclude access should be removed.</li> <li>• Provision is made for seating, cycle parking, litter bins, off leash dog areas, cycle parking, litter bins, skate parks, nature learning, picnic tables, etc. for older teenagers.</li> <li>• Pinchpoint at Deepwell in Blackrock Park needs to be addressed.</li> <li>• All public spaces should be age friendly and welcoming.</li> </ul>	<p><b><u>B0319</u></b> <b><u>B0492</u></b> <b><u>B1059</u></b> <b><u>B1195</u></b></p>		<p><b>The Executive notes the issues raised which are predominantly operational matters and not County Development Plan issues.</b></p> <p>The Council have however recently embarked on works to remove kissing gates and other barriers to accessibility in public parks. The Council have also as part of Covid measures introduced both more seating areas and more cycle parking in parks and open spaces.</p> <p>Policy Objective PHP14: Age Friendly Strategy states <i>“It is a Policy Objective to support and facilitate the implementation of the Dún Laoghaire-Rathdown Age Friendly Strategy 2016-2020”.</i></p> <p>The Council's 2016-2020 Age Friendly Strategy is currently under review. The new Strategy will run from 2021-2026 and will follow the nine themes (adopted from the World Health Organisation's model of Age Friendly Cities and Communities Programme), which are used as a basis for improvements that can be made to ensure that our County is an 'Age Friendly' place. The strategy includes the following: Outdoor Spaces and Buildings; Transportation;</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<ul style="list-style-type: none"> <li>The Council promote cycle ways / walkways where combined need to be wider – like new path/cycle way in Blackrock park.</li> </ul>			<p>Housing; Social Participation; Respect and Social Inclusion; Civic Participation and Employment; Communication and Information; Community Support and Health Services; and Safety and Security.</p> <p>The Strategy aims to identify the issues raised by older people and service providers and make real improvements, which will enhance community well-being and the quality of life of our older citizens.</p> <p>Chapter 12 Development Management (Section 12.3.9.1 'Age Friendly Housing', Section 12.8.4 'Open Space Quantity for Mixed Use, Non-Residential and Commercial', and Section 12.8.5 'Public Open Space – Quality') also provides guidance to ensure developments include adequate and suitable open spaces, which incorporate age friend measures.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>viii) Submission requests that DLR acknowledge the high amenity value of Dalkey's numerous parks (Killiney Hill Park, Sorento Park, Dillon's Park, Hyde Park and also Bullock Harbour, Hawk Cliff and White Rock beach, Dalkey Island) and should put in place appropriate policies and protocols to provide for their care and maintenance.</p>	<b>B0890</b>	4	<p>The Executive notes the issue raised.</p> <p>In Chapter 9, Section 9.2 the Draft Plan highlights Open Space and Parks and the numerous objectives with respect to the care and maintenance of the abundant parks and open spaces within the County in particular:</p> <ul style="list-style-type: none"> <li>Policy Objective OSR1: Open Space Strategy of the Draft Plan states that it is a Policy Objective of the Council to review the existing Open Space Strategy, 2012-2015 and to support the objectives of any new Open Space Strategy prepared within the lifetime of this Plan. This identifies any changes needed to improve access to, and the quality of open spaces in the County.</li> <li>Policy Objective OSR3: Future Improvements of the Draft Plan states that it is a Policy Objective to continue to improve, plant and develop more intensive recreational and leisure facilities within parks and open spaces insofar, as resources will permit, while ensuring that the development of appropriate complementary facilities does not detract from the overall amenity of the spaces.</li> </ul> <p>Day to day maintenance is a Parks operational matter.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ix) Submission requests that the emphasis on inclusive design of parks needs to be stronger and that the concept should be more fully developed and will include a broad range of facets (e.g. providing for age, gender, disability).</p>	<p><b>B0271</b></p>		<p>The Executive notes the issue raised.</p> <p>In Chapter 9 there are several references to the need for parks to be inclusive – in the opening paragraph, in Section 9.2.1.2 Policy Objective OSR2: Hierarchy of Parks and Open Space, and in Section 9.3.1.1 Policy Objective OSR5: Public Health, Open Space and Healthy Placemaking, where it is clearly stated that “<i>Open spaces should be inclusive and cater for all users (consistent with RPOs 9.12, 9.13, 9.14 of the RSES)</i>”. It is respectfully considered that the further development of the concept happens at the detailed design stage where all users are addressed.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p><b>3.9.2.3: Policy Objective OSR3: Future Improvements</b></p>			
<p>i) Submission request that the disability community are considered more and suggest that changing places Ireland public toilet facilities should be included in main urban areas &amp; coastal areas.</p>	<p><b>B0035</b></p>	<p>2</p>	<p>The Executive notes the issue raised and consider that DLR have a strong and proactive track record in relation to the provision of changing places facilities in the County.</p> <p>The Draft Plan contains detailed policies in relation to changing places facilities. In Section 9.2.1.3 Policy Objective OSR3: Future Improvements, the Draft Plan sets out that “<i>Since 2015, the Council has committed to supporting the roll out of Changing Places standard bathrooms across the County. Since then, a facility has been installed in Marlay Park. This plan seeks to include further Changing Places facilities in all regional parks where significant improvements are being undertaken</i>”. Chapter 4 also includes a brand-new Policy Objective specifically relating to Changing Places facilities, Policy Objective PHP17 which states that “<i>It is a Policy Objective to support and facilitate the roll out of `changing places bathrooms` across the County consistent with RPO 9.12 of the RSES</i>”.</p> <p>As part of this commitment a new Changing Places facility will be installed in Shanganagh Park in 2021, and the facility in Cabinteely Park will be upgraded.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
ii) Submission requests that the 'Pay to Play' intervention on the public open space at Monkstown Leisure Centre on Monkstown Road is removed	<b><u>B0410</u></b> <b><u>B1085</u></b>	3	<p>The Executive notes the issue raised.</p> <p><b>This is an operational matter for DLR Leisure and is not a County Development Plan issue.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
iii) Submission states there is a lack of large open spaces and native tree plantations in Dublin 18 and request that large native woodland areas and green spaces need to be integrated into all plans for the Glenamuck distributor road.	<b><u>B1174</u></b>		<p>The Executive notes the issue raised.</p> <p><b>The detailed design of the Glenamuck District Distributor Road (GDD)R is not a County Development Plan issue.</b> However, the Parks Department have advised that the planting for the new scheme will include an innovative approach, with an emphasis on wild planting and provision of trees.</p> <p>A Part 8 scheme for the development of Park and Recreational Facilities on lands adjacent to the new roadway at Glenamuck South has been approved by the Council (PC/1C/01/21). This development includes a children's play area, 'kickabout' area, water feature, footpaths, bench seating and tree planting.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
iv) Submission suggests that Stepside village could use the space beside the retail space (old pitch and putt) as a square with benches and flowers for pedestrians and cyclists.	<b><u>B0725</u></b>	9	<p>The Executive notes the issue raised. <b>This is a local parks maintenance/operational issue and not a County Development Plan issue.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
v) Submission notes that Jamestown Park is not yet open to the public and requests that the greenway link from Elmfield through Clay farm which is closed off be opened.	<b><u>B0725</u></b>	9	<p>The Executive notes the issue raised and would concur with the sentiments.</p> <p>The BELAP contains strong Policy Objectives relating to permeability links in the area, which are carried through to the Draft Plan via an SLO to implement the BELAP.</p> <p>Table 4.6 of the LAP details the Clay Farm Lane Link which will link Stepside East and the southern parts of Kilgobbin East to onward routes to Belarmine and Sandyford along the attractive laneway that currently links Clay Farm House, and Kilgobbin Cottage to Kilgobbin Road.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<p>Table 4.6 of the LAP also includes the Glenamuck Road to Kilgobbin Road Greenway, a dedicated Greenway Spine traversing the Plan area from east to west.</p> <p>Some of the new links in Clay Farm are not yet open to the public as they may not yet have been taken in charge, however, the 'Cruagh' link referenced in the submission is a good example of a permeability link.</p> <p>There is NTA funding for mobility routes through Jamestown Park and the Park Carrickmines.</p> <p>It is acknowledged that Jamestown Park is not yet open to the public, but plans are being progressed by the Parks Department in conjunction with Infrastructure and Climate Change Department, and the Environmental Protection Agency (EPA).</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
vi) Submission requests that more consideration be given to what could be described as informal amenities such as the country lanes and roads around areas such as Rathmichael, Killiney, Dundrum.	<b><u>B0923</u></b>		<p>The Executive notes the issue raised and would concur with the sentiments of the submission.</p> <p>It is considered that various sections of the plan recognise the importance of open space and that this includes recognition of the more informal areas, which serve the communities of the County.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
vii) Submission requests that the Plan include a commitment to green parks with seating & planting (elderly friendly) and playgrounds within 1-2km (walking distance) of all residents in suburban/built up areas.	<b><u>B0539</u></b>		<p>The Executive notes the issue raised.</p> <p>Policy Objective OSR1: Open Space Strategy of the Draft Plan states that it is a Policy Objective of the Council to review the existing Open Space Strategy, 2012-2015 and to support the objectives of any new Open Space Strategy prepared within the lifetime of this Plan. This will identify any changes needed to improve access to, and the quality of open spaces in the County.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<p>Parks and Landscape Services are committed to reviewing and updating the existing 2003 DLR Play Policy during the lifetime of the 2022 – 2028 County Development Plan, and details with respect to provision of playgrounds within DLR County will be covered within this review.</p> <p>While not stated in the 2003 Play Policy, the Parks and Landscape Services section have advised that they endeavour to provide a playground within a 1.2m radius of the majority of residences in the urban area of Dún Laoghaire-Rathdown, and that this has largely been achieved. The radius is measured as the radial distance from the playground and not the actual walking routes, which would obviously vary in length.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>viii) Submissions raise issues in relation to parks including:</p> <ul style="list-style-type: none"> <li>• Requests for suitable / accessible seating in public parks and places.</li> <li>• Requests that consideration be given to the addition of a skate park / bike park to Fernhill.</li> <li>• A commitment to green parks with seating &amp; planting (elderly friendly) within 1-2km of all residents in suburban/built up areas.</li> </ul>	<p><b><u>B0930</u></b> <b><u>B1075</u></b> <b><u>B1147</u></b> <b><u>B0539</u></b></p>	<p>3 4</p>	<p>The Executive notes the issue raised.</p> <p><b>These are detailed design and parks operational issues not County Development Plan issues.</b> In relation to Fernhill the Parks Department have advised that a future Plan may include for same, and that the development of the adventure Woodland Play area is an ongoing project.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ix) Submissions raise issues in relation to public toilets in the County including in Dún Laoghaire/Sandycove/Glasthule areas, and in Luas/Dart Stations.</p>	<p><b><u>B0708</u></b> <b><u>B0937</u></b> <b><u>B0467</u></b> <b><u>B1147</u></b></p>	<p>3 4</p>	<p>The Executive notes the issue raised.</p> <p><b>Provision of public toilets is not a County Development plan issue.</b> Provision of such toilet facilities in Dart Luas stations falls outside the remit of the Council.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.9.2.4: Policy Objective OSR4: Public Open Space Standards</b>			
<p>i) Submission seeks clarity in relation to the use of the terms 'open space' and 'public open space' throughout the plan as these are used interchangeably.</p>	<p><b><u>B0529</u></b> <b><u>B0271</u></b> <b><u>B1134</u></b></p>		<p>The Executive notes the issue raised and appreciate that there may be confusion.</p> <p>Public open space is defined in Table 12.7 Categories of Open Space for residential development, Chapter 12 as, "<i>being generally freely available and accessible to the public, and in the case of certain residential developments has, or is intended to be, 'taken-in-charge'. by</i></p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
			<p><i>the Local Authority</i>”. Table 9.1, Chapter 9, sets out the various categories of public open space in a hierarchical basis, ranging in descending order from Regional Parks with Countywide importance to small incidental spaces.</p> <p>For developments coming forward the open space standards including those for public open space are set out in Chapter 12. The Draft Plan includes a new clear distinction between communal open space, and public open space requirement for residential schemes.</p> <p>However, open space can also include private facilities which carry the ‘F’ land use zoning objective, and which function as open space, but which are not in public ownership – some sports facilities being good examples. The Policy Objectives in Section 9.2, Chapter 9, however, mainly relate to public open space, although Policy Objective OSR4 also references the communal and private requirements around residential development.</p> <p><b>Recommendation</b>  Amend Section 9.2.1.2 (p. 179) Policy Objective OSR2: Hierarchy of Parks and Open Space as follows:</p> <p>From:  9.2.1.1 Policy Objective OSR2: Hierarchy of Parks and Open Space</p> <p>To:  9.2.1.2 Policy Objective OSR2: Hierarchy of Parks and <u>Public Open Space</u></p> <p>Amend Section 9.2.1.3 Policy Objective OSR3 (p. 181) from:  <i>“It is a Policy Objective to continue to improve, plant and develop more intensive recreational and leisure facilities within parks and open spaces....</i></p> <p><i>There are over 800 hectares of parks and open spaces of varying landscape types throughout the County”.</i></p> <p>To:</p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
			<p><i>“It is a Policy Objective to continue to improve, plant and develop more intensive recreational and leisure facilities within parks and <u>public</u> open spaces....</i></p> <p><i>There are over 800 hectares of parks and <u>public</u> open spaces of varying landscape types throughout the County”.</i></p>
<p>ii) Submission states that green spaces should be co-designed with communities and reflect local needs. There is a lack of green space in Sandyford Business District – needs improvement.</p>	<p><b>B0627</b></p>		<p>The Executive notes the issues raised.</p> <p>The importance of Green Infrastructure (GI) is highlighted in Section 8.3, Chapter 8, of the Draft Plan.</p> <p>Policy Objective OSR4: Public Open Space Standards states that it is an objective of the Council to promote public open space standards generally in accordance with overarching Government guidance documents ‘Sustainable Residential Development in Urban Areas - Guidelines for Planning Authorities’, (2009), the accompanying ‘Urban Design Manual - A Best Practice Guide’, and the ‘Sustainable Urban Housing: Design Standards for new Apartments’, (2018).</p> <p>The Guidelines emphasise the need for quality in public open spaces in terms of design, robustness, accessibility, biodiversity and passive supervision/overlooking.</p> <p>The Guidelines also indicate specific requirements with respect to Open Space and Recreation, which are referenced in the Development Management Section of the Draft Plan (see Chapter 12, Section 12.8). Additionally, Section 12.8.2 and Section 12.8.3.3, of the Draft Plan sets out very clear requirements pertaining to public, communal, and private open space.</p> <p>With respect to the Sandyford Business District, Section 1.6.1 of Appendix 17 of the Sandyford Urban Framework Plan (SUIFP) states that it is an overall rationale of the SUIFP, “to create a hierarchy of public open spaces within Sandyford Business District providing high quality amenities and a variety of functions to serve both the resident and employee populations” and “to provide a network of ‘green’ routes and integrated streets linking the public open spaces, creating a legible and attractive environment for pedestrians and cyclists linking origins with destinations”.</p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
			<p>Certain areas in the Plan lands are ear marked for public open space.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.9.3: Section 9.3 Open Space and Recreation</b>			
<b>3.9.3.1: Policy Objective OSR5: Public Health, Open Space and Healthy Placemaking</b>			
<p>i) Submissions raise various issue pertaining to quality of life, health and open spaces/access to amenity as follows:</p> <ul style="list-style-type: none"> <li>• Leisure and green space should be available for public mental and health well-being.</li> <li>• Quality of life for the children and communities should be at the centre of the Plan providing safe recreational green space, for all ages.</li> <li>• The link between spatial planning and health policy should be made more explicit in the County Development Plan.</li> </ul>	<p><b><u>B0271</u></b> <b><u>B0737</u></b> <b><u>B0740</u></b> <b><u>B1171</u></b></p>		<p>The Executive notes and welcomes the issues raised but would not concur that the Draft Plan needs to be more explicit in link between spatial planning and health.</p> <p>In recognition of the important link between one’s spatial environment and both physical and mental wellbeing the Draft Plan has placed an entirely new emphasis on this area including an overarching Strategic County Outcome which is the <i>Creation of an Inclusive and Healthy County</i> which is set out in Chapter 1, and which then permeates through the Draft Plan. The Draft Plan states that “<i>Mental and physical health is affected by the environment in which we live. Access to sustainable transport, housing, quality placemaking, green space and community infrastructure can have a significant can’t influence on the health and wellbeing of all</i>”.</p> <p>Chapter 9 also includes the new Policy Objective OSR5: <i>Public Health, Open Space and Healthy Placemaking</i>, which further strengthen this emphasis.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.9.3.2: Policy Objective OSR6: Allotments and Community Gardens</b>			
<p>i) Submissions raise the following issue relating to allotments and community gardens:</p> <ul style="list-style-type: none"> <li>• A community garden should be provided at Marlay.</li> <li>• Lack of allotments needs to be addressed.</li> <li>• Request more community gardens.</li> </ul>	<p><b><u>B0052</u></b> <b><u>B0338</u></b> <b><u>B0754</u></b> <b><u>B0949</u></b> <b><u>B1132</u></b> <b><u>B1206</u></b></p>	5	<p>The Executive notes the issues raised.</p> <p>Policy Objective OSR6: Allotments and Community Gardens of the Draft Plan supports the provision of allotments and community gardens at specific locations within the County. Policy Objective OSR6, also indicates that Community gardens are located at Shanganagh Community Garden, and Fernhill Community Garden. The Council has also established allotments at Goatstown and Shankill.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<p>Developments, such as Cualanor contain communal working garden allotments, which would contribute greatly to the development of strong communities.</p> <p>Hudson Park is a welcome addition but would also benefit from the provision of an enclosed community garden in the park.</p> <p>No mention in Plan of 'community gardens' in Council parks or lands</p>			<p>The Parks and Landscape Services Department have advised that there are challenges in providing community gardens at Hudson Park due to the size and its use as a multi-use facility. In relation to Marlay, the Parks Department would welcome the inclusion of a community garden at Marlay in future plans for the area.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission requests the use of open/underutilised space for food growing</p>	<u>B1196</u>		<p>The Executive notes the issue raised.</p> <p>Policy Objective OSR6: Allotments and Community Gardens of the Draft Plan states that the Council will support the provision of additional public allotments and community gardens to improve their provision and distribution across the County and will allow for active participation in the growing of food and includes other sustainable activities, such as composting and beekeeping.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.9.3.3: Policy Objective OSR7: Trees, Woodland and Forestry</b>			
<p>i) Submission suggest that this Policy Objective should be repositioned to suggested subsection in Chapter 11 Amenity Woodland.</p>	<u>B0594</u>		<p>The Executive notes the issues raised in this comprehensive submission. However, it is considered that the position of Policy Objective OSR7, within Chapter 9, is relevant due to the overall Chapter focus and associated Policy Objectives therein.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submissions raise various issues in relation to trees woodlands and forestry as follows:</p> <ul style="list-style-type: none"> <li>• Suggests the provision of woodland along the route from Heronford Lane and along Pucks Castle lane.</li> </ul>	<u>B0032</u> <u>B0041</u> <u>B0047</u> <u>B0053</u> <u>B0063</u> <u>B0271</u> <u>B0338</u>	2	<p><b>The Executive notes the issues raised many of which are not County Development Plan issues.</b></p> <p>The Tree and Urban Strategy will be prepared in late 2021 and will include for overall provision of more trees as appropriate. Additional tree planting is also dealt with by way of conditions attached to planning permissions. It is noted that some of the sites referenced are</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<ul style="list-style-type: none"> <li>• Request an increase in tree planting on Corrig Park footpath.</li> <li>• Requests enhanced protection for local trees and hedgerows.</li> <li>• Tree planting initiatives should be introduced.</li> <li>• Requests that unused areas of public parks are planted with fruit trees to benefit both park users, quality of life, biodiversity, and wildlife.</li> <li>• Request planting of more trees to improve the quality of the environment, mitigate climate change, and make the County a better place to be.</li> <li>• Tree planting scheme should be encouraged in private gardens.</li> <li>• A number of trees should be planted on the extended footpath on Tivoli Road.</li> <li>• Request that the orchards in Ballycorus valley are saved.</li> <li>• Requests the retention of natural woodland.</li> <li>• Request the reinstatement of Trees on Greenville Road.</li> <li>• Request planting of fruit trees and specimen exotic trees on roadsides and in parks to allow for local harvesting, increase the bee population and enhance the beauty of the area.</li> <li>• Request planting of a specimen tree in all roundabouts especially at Loughlinstown Hospital.</li> <li>• Request enhanced protection for trees.</li> <li>• Tree planting should be a prerequisite for planning decisions on new developments.</li> </ul>	<p><b><u>B0413</u></b>  <b><u>B0471</u></b>  <b><u>B0533</u></b>  <b><u>B0745</u></b>  <b><u>B0754</u></b>  <b><u>B0761</u></b>  <b><u>B0802</u></b>  <b><u>B0869</u></b>  <b><u>B1155</u></b>  <b><u>B1164</u></b>  <b><u>B1181</u></b>  <b><u>B1194</u></b>  <b><u>B1206</u></b></p>		<p>in private ownership and, therefore, it would be up to the landowner to proceed with any additional tree planting.</p> <p>Section 9.3.1.3 of the Draft Plan, Policy Objective OSR7: Trees, Woodland and Forestry states as follows; <i>“It is a Policy Objective to implement the objectives and policies of the Tree Policy and the forthcoming Tree Strategy for the County, to ensure that the tree cover in the County is managed, and developed to optimise the environmental, climatic and educational benefits, which derive from an ‘urban forest’, and include a holistic ‘urban forestry’ approach”</i></p> <p>Chapter 12 sets out quantitative standards in relation to provision of open space for new developments. The detailed design would include tree planting. The requirement that new developments should be required to provide a minimum of 25% tree cover is not considered realistic having regard to the standard requirements in relation to open space provision.</p> <p><b>Recommendation</b>  No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<ul style="list-style-type: none"> <li>The woodland belt between Shrewsbury Road and Castle Farm in Shankill requires maintenance.</li> <li>Request that new developments should be required to provide a minimum of 25% tree cover and encouraged to exceed this level.</li> </ul>			
<p>iii) Submission requests for removal of 3 objectives "To preserve and protect trees and Woodland", on lands on Brennanstown Road. It is considered that trees can be best retained in the context of a site-specific tree survey.</p>	<b><u>B0831</u></b>	6 9	<p>The Executive notes the issue raised, particularly the consultant's argument for the removal of 3 no. objectives to preserve trees and woodlands. While it is good to note that a tree survey has been undertaken, the argument for removing the objectives is not accepted.</p> <p>Paragraph 3.36 of the submission states that the survey demonstrated " a low number of Category A trees which would be worthy of retention". If that is the case, it further strengthens any argument for retaining the objectives to preserve trees on the lands in question. Furthermore, Category A is not the only category of trees that may be retained in developments. Category B (20 years remaining life span) and occasionally C trees (10 years remaining life span) may, subject to feasibility, be preserved and retained. The Council has previously sought such retention as part of the Development Management process.</p> <p>For the above reason, Parks and Landscape Services contend and recommend that the rationale for retaining the three objectives on these lands is reasonable and prudent in terms of sustainable development, and in accordance with County Development Plan policy on tree preservation.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Submission states that the policy does not reflect the private ownership of forestry in the Dublin Mountains and the commercial basis of these forests. The Council should engage more stakeholders in the development of this Plan, namely the Irish Farmers Association, private landowners, business owners, and other stakeholders in the Dublin Mountains.</p>	<b><u>B1168</u></b>		<p>The Executive notes the issue raised. The zoning maps do not reflect ownership of land and it would not be appropriate to do so.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
v) An Taisce recommends that that a tree restoration plan be drawn up for the protection of existing trees, replanting, and restoration of the designed woodland arboreal landscape in Marlay Park.	<b><u>B0794</u></b>		The Executive notes the issue raised. The Marlay Masterplan is in place and work will be carried out in accordance with the approved Plan. <b>This is a parks operational matter.</b>  <b>Recommendation</b> No change to Draft Plan.
vi) Submissions request various TPOs in the County including at the following locations: <ul style="list-style-type: none"> <li>• Monkstown Heronry.</li> <li>• The mature trees and hedgerow at Kilgobbin Heights/South.</li> <li>• Large mature Sycamore trees in the fenced field between St. Joseph's School Dún Laoghaire and Fairway Drive, Cualanor.</li> </ul> <p>Submissions also request that any 'Tree Preservation Orders (TPOs) must be made with close communication and full agreement with any private landowner in the County.</p> <p>Submission requests that the Council replace the missing trees in the tree belt behind the pond at Marlay Park.</p>	<b><u>B0052</u></b> <b><u>B0350</u></b> <b><u>B0529</u></b> <b><u>B0689</u></b> <b><u>B0690</u></b> <b><u>B1134</u></b> <b><u>B1150</u></b> <b><u>B1168</u></b> <b><u>B1198</u></b>	1 2 3	The Executive notes the issues raised.  The Council will prioritise the making of Tree Preservation Orders (TPOs) based on the judicious selection of trees that meet objective criteria, in accordance with best landscape and arboricultural practices. The Council Parks Department will, subject to resources develop a TPO procedure that sets out a clear rationale and robust decision-making process with the allocation of adequate and appropriate resources necessary to prepare, administer and sustainably manage TPOs in the County. In the making of a TPO under Section 205 of the Planning and Development Act, 2000 (as amended), the Planning Authority is required to serve a notice on the owner and the occupier of the land affected by the order.  The Marlay Masterplan is in place and work will be carried out in accordance with the approved Plan. Replacement of trees in Marlay is a Parks operational matter.  <b>Recommendation</b> No change to Draft Plan.
vii) Submissions request insertion and/or deletion of tree symbols as follows: <ul style="list-style-type: none"> <li>• Reinstatement of a symbol at Our Lady's Grove School.</li> <li>• Addition of symbols within the Irish Glass Bottle site.</li> <li>• Addition of symbols within the Central Mental Hospital site and at the entrance.</li> <li>• Removal of tree protection symbol at Rocklawn, Leopardstown in particular the trees on the western boundary of the subject site.</li> </ul>	<b><u>B0137</u></b> <b><u>B0805</u></b> <b><u>B0984</u></b> <b><u>B1023</u></b> <b><u>B1046</u></b> <b><u>B1125</u></b>	1 2 6	The Executive notes the issue raised.  In relation to Our Lady's Grove the existing Plan shows three tree symbols all along the boundaries of the site. The Draft Plan shows two of these with the third to the south-west omitted. Following a site inspection Parks and Landscape Services reported that the trees (mostly Sycamore), are still in place and providing useful visual amenity and screening to adjoining residences. Therefore, it is recommended that the tree symbols in the south-west corner of Our Lady's Grove site (backing onto Larchfield Road) as contained in the current 2016 – 2022 County Development Plan be reinstated.

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
<ul style="list-style-type: none"> <li>• Addition of symbols to the planting along the banks of the River Slang between the Dundrum Shopping Centre and the River Dodder.</li> <li>• Removal from the Chesterfield House site, cross Avenue, as a tree survey only identified 2no. category A tree on site.</li> </ul>			<p>In relation to the Irish Glass Bottle (IGB) site following a site inspection, it is noted that there are some trees existing along the site boundaries, however, the Parks and Landscape Service have advised that these trees do not merit the inclusion of tree symbols in the Draft Plan.</p> <p>In relation to the Central Mental Hospital site, Parks and Landscape Services have recommended that it is appropriate that tree symbols are included on this site at three locations, one covering trees close to the entrance and the other two relating to trees adjacent to the proposed Protected Structures.</p> <p>In relation to Rocklawn, Leopardstown, whilst it is acknowledged that the most significant trees on the site are located in the north-western corner and comprise of a group of Monterey Pine, it is considered that the trees on site make a positive contribution to visual amenity and should be preserved. It is not recommended that the tree symbols currently shown on the Draft Plan be removed.</p> <p>Regarding the Dundrum Slang between the Dundrum Shopping Centre and the River Dodder, Maps 1 and 5 of the Draft Plan indicate that this portion of land is already subject to the objective “to protect and preserve Trees and Woodlands”, the requirement for additional symbols at this location is not warranted.</p> <p>In relation to the Chesterfield House site, the argument made in the submission is not accepted. The use of the objective and criteria applied do not depend on the number of trees in question. In many cases the symbols used for the objectives in the draft maps, represent single, specimen trees. The submission refers to a tree survey finding of 2 no. 'A' Category trees; that is sufficient grounds for application of the preservation and protection objective.</p> <p><b>Recommendation</b> Amend Map 1 as follows:</p> <p>Reinstate tree symbol at Our Ladies Grove site (backing into Larchfield Road) on Map 1.</p> <p>Insert tree symbols at three locations on the Central Mental Hospital site, one close to the entrance and two to the south and south west of the proposed Protected Structures.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<p>viii) Submission considers that the proposed tree symbols on Map 1 at the Junction of Churchtown Road Upper and Whitehall Road (and Landscape Park) is not sufficient to protect the cherry blossom trees at this location.</p> <p>Requests that the length of Churchtown Road Upper from the junction with Riverside Drive to the junction with Landscape Crescent is designated as a "Cherry Blossom Arboreal Sanctuary", requiring the development of an implementation plan for its protection, enhancement, and long-term sustainability.</p>	<b><u>B1055</u></b>		<p>The Executive notes the issue raised and consider that the tree symbol is sufficient.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ix) Submission notes that the Plan has does not include proposals for mitigation of urban tree pollen levels. This could be achieved via a commitment to plant balanced number of female trees to absorb excess pollen.</p>	<b><u>B0539</u></b>		<p>The Executive notes the issue raised. The Tree and Urban Strategy will be prepared in late 2021. The overall objective of the Tree strategy will try to maximise pollinator trees in general. It is acknowledged that certain species have higher pollen levels, such as lime.</p> <p><b>This is not a County Development Plan issue.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.9.3.4: Policy Objective OSR8: Greenways and Blueways Network</b>			
<p>i) Submission welcomes Policy Objective OSR8 Greenway and Blueway Network within the County and co-ordinating with adjoining authorities.</p> <p>Submission suggested that "where the development of new greenways and blueways is considered, these should look to support rather than replace existing green infrastructure".</p> <p>Submissions considers there is also merit in "the Plan promoting the need to be careful not to remove or degrade existing natural or existing green</p>	<b><u>B0038</u></b>		<p>The Executive welcomes the positive comments on the issues raised.</p> <p>Policy Objective OSR8: Greenways and Blueways Network of the Draft Plan states, "It is a Policy Objective to develop a comprehensive network of County Greenways linking parks and public open spaces and to liaise with adjoining local authorities and other stakeholders to achieve and improve wider external linkages and corridors, to enable enhanced connectivity to wider strategic networks, and to allow for the long-term strategic expansion of urban areas (consistent with NPO 62 of the NPF)", and that, "Greenways are a term for the collective networks of parks and open spaces which facilitate green modes of movement, (walkers, cyclists, roller skaters, horse riders) for pleasure, recreation, tourism and daily journeys, that are a unique feature of the County".</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<p>infrastructure, and potentially negatively impact on designated European or national sites".</p> <p>Development of new greenways and blueways should support rather than replace existing green infrastructure.</p>			<p>As per the above, the main thrust of the Policy Objective in OSR8: Greenway and Blueway Network, addresses the issues raised in the submission with respect to "connecting with nature for health and wellbeing", use existing green infrastructure and ensuring no impact on designated site. The Executive also notes that there is an overall focus on health and wellbeing throughout the Draft Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission suggests that enhanced protections are needed for our remaining hedgerows along old County lanes.</p>	<b><u>B0122</u></b>		<p>The Executive notes the issue raised. Policy Objective OSR8: Greenways and Blueways Network of the Draft Plan indicates that the Council will protect existing hedgerows, important tree lines, and individual trees against unnecessary damage during planning, design, and the development of each greenway route.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submission suggests that any Greenway projects should only be implemented after extensive consultation with landowners and adjoining landowners without the use of CPO.</p>	<b><u>B0302</u></b>		<p>The Executive notes the issue raised.</p> <p><b>The implementation of any greenway project is an operational matter and not a County Development Plan issue.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Submission suggests:</p> <ul style="list-style-type: none"> <li>• That this Policy Objective should be repositioned in Chapter 5 Transport and Mobility in 5.5 Promoting Active Travel: Cycling and Walking as additional provisions.</li> <li>• Request additional Policy Objectives be included which have been drafted from numerous examples of such from other Local Authorities on recreational use of lakes, beaches, rivers, uplands, impact of golf courses on ROW, Noise Generating Sports Developments.</li> </ul>	<b><u>B0594</u></b>		<p>The Executive notes the issues raised in this comprehensive submission.</p> <p>The purpose of Policy Objective OSR8: Greenways and Blueways Networks is to develop a comprehensive network of County Greenways linking parks and public open spaces and to liaise with adjoining local authorities and other stakeholders to achieve and improve wider external linkages and corridors, to enable enhanced connectivity to wider strategic networks, and to allow for the long-term strategic expansion of urban areas.</p> <p>Greenways are a term for the collective networks of parks and open spaces which facilitate green modes of movement, (walkers, cyclists, roller skaters, horse riders) for pleasure, recreation, tourism, and daily journeys, that are a unique feature of the County. Therefore, it</p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
<ul style="list-style-type: none"> <li>Request byelaws banning the use of motor bikes and quads (except for bona fide agricultural purposes) in privately- owned areas of rough grazing (including commonage) and motorised para gliders.</li> </ul>			<p>is considered that the position of Policy Objective OSR8 within Chapter 9 is relevant due to the overall Chapter focus and associated Policy Objectives therein.</p> <p>Furthermore, it is considered that existing Policy Objective OSR8: Greenways and Blueways Network is sufficiently robust and deliberately worded to achieve the aims of the Council with regard to greenways and blueways, and open space, therefore additional policies in this regard are neither required nor necessary. <b>The passing of byelaws is not County Development Plan issue.</b></p> <p>This is also cross-referenced within Chapter 5, ‘Transport and Mobility’, of the Draft Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.9.4: Section 9.4 Sports and Play</b>			
<b>3.9.4.1: Policy Objective OSR9 – Sports and Recreational Facilities</b>			
<p>i) Submission:</p> <ul style="list-style-type: none"> <li>Requests that participation in sport and physical activity be incorporated as an important objective in its own right.</li> <li>Considers that sport must be easily accessible in the community and consideration and resources given to providing fit-for-purpose multi-use areas (both indoor and outdoor) for the communities.</li> </ul>	<b><u>B0219</u></b>		<p>The Executive notes the issue raised in this detailed submission from the Dún Laoghaire-Rathdown Sports Partnership. <b>Many of the issues raised are of more relevance to the work of DLR leisure and other departments.</b></p> <p>Policy Objective OSR9 of the Draft Plan does promote the provision, and management of high-quality sporting, and recreational infrastructure throughout the County, in accordance with the National Sports Policy 2018-2027. The Policy Objective acknowledges that (underlining added) <i>“The benefits accruing from <u>participation</u> in sport and recreational activities are well documented. Sports facilities and grounds in DLR include a variety of both indoor and outdoor recreational facilities, which provide for the active recreational needs of the community. It is important that facilities are located where they are of most value and accessible to the community being served”.</i></p> <p>The Draft Plan also contains policies supporting and ensuring the dual usage of school facilities including school sports facilities (PHP7, page 73), and provision of multifunctional community facilities (PHP5, page 72). The new SNI land use zoning objective also aims to secure facilities, including recreational facilities.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission requests that the Council should consider a purpose-built track for "Electric" Radio Control Cars in Marley Park beside top car park.</p>	<u><b>B0236</b></u>		<p>The Executive notes the issue raised. <b>This is a parks operational matter.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submission welcomes Policy Objective OSR9 “to promote the provision, and management of high-quality sporting, and recreational infrastructure throughout the County”, and requests that athletics is not overlooked as significant improvement is needed to athletics facilities in DLR. The Council should provide athletics facilities for example</p>	<u><b>B1049</b></u>		<p>The Executive welcomes the support provided and notes the issue raised in relation provision of athletics facilities. The Draft Plan contains Specific Local Objective 48, which states that it is an objective of the Council, “<i>To support the development of a multi-sport complex at St Thomas’s, Tibbradden Road</i>”, this will provide athletics facilities.</p> <p>In addition, the Council have sports capital funding to upgrade the track at Kilbogget Park, which is in accordance with Specific Local Objective 67, “<i>To upgrade and improve Kilbogget Park in accordance with the approved Masterplan</i>”, (it should be noted that the wording of SLO 67 is recommended elsewhere to be updated to state the forthcoming or future masterplan for Kilbogget Park).</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Submission considers that:</p> <ul style="list-style-type: none"> <li>• That that Mountain Biking and Hiking do not mix well and should be separated.</li> <li>• That the area with views over Dublin Bay should be protected for walkers with some carefully chosen biking routes to join the existing Coillte biking trails.</li> </ul>	<u><b>B0419</b></u>		<p>The Executive notes the issue raised.</p> <p>Large tracts of this land are in the ownership and control of Coillte. Those at Ticknock forest, Three and Two Rock Mountains and Glencullen would be in the control of Coillte. <b>The subject matter contained in the submission is effectively an operational and management issue for Coillte (and other landowners as appropriate), and the Dublin Mountain Partnership.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>v) Submission requests more facilities such as:</p> <ul style="list-style-type: none"> <li>• Mountain bike trails.</li> <li>• Youth cycling facilities, such as Pump tracks and proper skate parks.</li> </ul>	<u><b>B0740</b></u> <u><b>B0953</b></u> <u><b>B1085</b></u>		<p>The Executive notes the issue raised. As part of the Blackrock Park Masterplans a skate park and pump track are to be developed in the park.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
vi) Submission: <ul style="list-style-type: none"> <li>• Requests a specific strategic Policy Objective to improve the sports infrastructure in Kilbogget Park to maximise its 'active amenity potential' and to provide a focus for an active amenity spine from Kibogget Park to Loughlinstown (Leisure Centre), to Ballybrack, Cabinteely, Meadow Vale and to Deans Grange/Blackrock.</li> <li>• Considers that Kilbogget Park has the potential to act as a national exemplar in climate action - through the incorporation of sustainable, decarbonised energy generation alongside the enhancement of playing pitches.</li> <li>• Requests a commitment in the shared clubhouse facility project, as already included in DLR's Space to Play strategy.</li> </ul>	<b>B0914</b>	7 10	The Executive notes the issue raised which relate to Kilbogget Park and are more appropriate for the future masterplan for the park. The Council remain committed to the shared clubhouse facility subject to securing the required funding. <p><b>Recommendation</b> No change to Draft Plan.</p>
vii) Submission considers that adequate sports facilities are seen to be lacking by residents in the Dundrum/CMH area and considers that future developments including schools and any development on the CMH lands should include sporting facilities.	<b>B1125</b>	1	The Executive notes the issue raised. Section 9.4.1.1 of the Draft Plan sets out that <i>"In accordance with the 'DLR Space to Play Strategy', 2017-2022, the Council will strive to provide facilities for sport and physical activity that are well maintained, sufficient in number and accessible to as many local people as possible, across a diverse range of sports."</i> This section also sets out the requirements in relation to dual use of future school facilities, which would include sports facilities. <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.9.4.2: Policy Objective OSR10: Protection of Sports Grounds/Facilities</b>			
i) Submission objects to the designation of sportsgrounds, which are not accessible for recreational pursuits by the public, as public green space.	<b>B0475</b>	9	The Executive notes the issue raised but would not concur. <p>The definition of open space as set out in the Draft Plan is as follows (underlining added for emphasis): <i>"Open Space Open space is a parcel of land in a predominantly open and undeveloped condition that is suitable for the following:</i></p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<ul style="list-style-type: none"> <li>• <i>Outdoor and indoor sports facilities and cultural use - <u>owned publicly or privately</u>, and with natural or artificial surfaces including tennis courts, bowling greens, sports pitches, golf courses, athletic tracks and playing fields.</i></li> <li>• <i>Amenity green space - often around housing - including formal recreational spaces.</i></li> <li>• <i>Provision for community play areas including playgrounds, skateboard parks and outdoor basketball hoops.</i></li> <li>• <i>Green corridors. M Natural Areas.</i></li> <li>• <i>Community gardens.</i></li> <li>• <i>Wildlife and native plant habitats”.</i></li> </ul> <p>The open space zoning objective applies to both public and privately owned open space, as ownership is not a Planning matter.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission from the GAA highlights their support of Policy Objective OSR10 - Protection of Sports Grounds/Facilities.</p> <p>Submission suggests an amendment in the related text in the Draft Plan in the form of a clear commitment by the Council to facilitate and engage in the necessary works required to achieve the 'maximisation' objective through upgrading existing pitches.</p> <p>Submission request inclusion of specific provisions for engagement by the Council at the commencement stage of the process with the local stakeholders e.g. clubs with respect to rehabilitation programmes for playing pitches to ensure full engagement is such a programme.</p>	<b>B1012</b>		<p>The Executive welcomes the submissions but notes that many of the issue raised are operational matters for the Parks and landscape department.</p> <p><b>Maximisation of use of pitches, provision of floodlighting, changing rooms and toilets and engagement with the public at commencement stage all relate to the parks operational programme and funding and are not County Development Plan issues.</b></p> <p>It is considered sufficient that the high-level strategic Policy Objective supports maximisation of use of pitches without getting into specifics of operation of facilities in the County.</p> <p>The Planning Authority would not share the concern in relation to the change to Policy Objective OSR10 as the onus will still rest with Planning Authority to assess development(s) subject to planning permissions, and that assessment will include whether the measures proposed by any developer ensure that the subject development will not interfere with the operational capacity or recreational amenity function of the sports facility/sports grounds.</p> <p>Furthermore, third party observations can be made with respect to any planning application for this type of development proposal. All issues/objections raised by third party observations will be noted and addressed by the Planning Authority during the assessment of the planning application.</p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
<p>The submission suggests that the following should also be considered in the Policy Objective:</p> <ul style="list-style-type: none"> <li>• Flood lighting.</li> <li>• Upgrading of dressing rooms and toilets.</li> <li>• Provision of all-weather playing possibility of siting smaller scale facilities of this type within residential areas.</li> </ul> <p>The submission also notes that ‘Policy Objective OSR10’ includes an amendment which relates to development within 10m of established sporting facilities/grounds and that “there will be an obligation on the developer to demonstrate that the ameliorative measures proposed will ensure that the subject development will not interfere with the operational capacity or recreational amenity function of the sports facility/sports grounds.” Submission considers that the onus is now imposed on the prospective developer to demonstrate compliance with this objective as opposed to the Council determining the measures. Submission request reassurances that this will not in any way weaken or undermine the intent of this particular provision.</p>			<p><b>Recommendation</b> No change to Draft Plan.</p>
<p><b>3.9.4.3: Policy Objective OSR11: Water-Based Sports</b></p>			
<p>i) Submission suggests that this Policy Objective should be repositioned in Chapter 8 Green Infrastructure and Biodiversity into Section 8.6 The Coast as an additional Policy Objective.</p>	<p><b>B0594</b></p>		<p>The Executive notes the issues raised in this comprehensive submission. Section 9.4 of the Draft Plan refers to Sport and Play, therefore the position of Policy Objective OSR11: Water-Based Sports, which relates to supporting water-based and maritime leisure activities within Chapter 9 is relevant due to the overall Chapter focus and associated Policy Objectives therein.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
<p>ii) Various submissions request policy and objectives to promote, improve and develop sea swimming facilities including:</p> <ul style="list-style-type: none"> <li>• Ongoing management maintenance and investment in the existing sea swimming locations.</li> <li>• The development of additional access ladder facilities at the existing forty foot and other sea swimming locations along the coast.</li> <li>• ensuring maintenance of swimming spots, including Dillon's Park and Coliemore Harbour.</li> <li>• Include a commitment to Swimming pools for people who do not live within 2 or 5km of the sea, and who cannot avail of easy public transport access.</li> <li>• Request for a tidal required.</li> <li>• Request for hot showers, changing facilitated and toilets at the forty foot.</li> <li>• Request alternative swimming spots to Forty Foot including west pier, inside Dún Laoghaire Harbour during winter months, a safe roped off swimming area near Dún Laoghaire plaza and old ferry pier (currently unused).</li> </ul>	<p><b><u>B0539</u></b>  <b><u>B0629</u></b>  <b><u>B0723</u></b>  <b><u>B0739</u></b>  <b><u>B0758</u></b>  <b><u>B0780</u></b>  <b><u>B0905</u></b>  <b><u>B0976</u></b>  <b><u>B0990</u></b>  <b><u>B1000</u></b>  <b><u>B1060</u></b>  <b><u>B1094</u></b>  <b><u>B1123</u></b>  <b><u>B1147</u></b></p>	<p>1</p>	<p>The Executive notes and welcomes the issues raised and appreciates that there has been a huge upsurge in the numbers partaking in year-round sea swimming at the many unique coastal swimming locations in the County. The provision of additional ladders and roped off swimming areas, a tidal pool, toilets and changing rooms, <b>are operational issues and not County Development Plan issues.</b></p> <p>It should be noted that the redeveloped Dún Laoghaire Baths, which will be an alternative to the Forty Foot, will include new swimming areas, changing room and toilet facilities including a changing places toilet.</p> <p>It should also be noted that swimming is not permitted within the Harbour due to the presence of boats. Harbour Bye laws controls this. Swimming is also not permitted within Coliemore Harbour or advised at Dillon's Park.</p> <p>In Chapter 8, Policy Objective GIB9 relates to beaches and their use for recreational purposes and in Chapter 9, Policy Objective OSR11 supports and encourages water-based and maritime leisure activities along the coast subject to Council Bye-Laws.</p> <p>Policy Objective OSR12 specifically relates to Dún Laoghaire Harbour area and recreational uses. It is considered that Policy Objective GIB9 should be amended to also reference bathing areas in the title.</p> <p><b>Recommendation</b>  Amend Section 8.5.3 Policy Objective GIB9: Beaches (p 162) as follows:  From:  <i>8.5.3 Policy Objective GIB9: Beaches</i>  <i>"It is a Policy Objective to promote the use of certain beaches for amenity and recreational use, and to continue to develop the County's beaches in co-operation with local and environmental interest groups".</i></p> <p>To:  <i>"8.5.3 Policy Objective GIB9: Beaches and <u>Bathing Areas</u>.</i></p>

Issues	Sub. No.	Map No.	Executive's Opinion & Recommendation
			<i>It is a Policy Objective to promote the use of certain beaches and <u>Bathing Areas</u> for amenity and recreational use, and to continue to develop the County's beaches and <u>Bathing Areas</u> in co-operation with local and environmental interest groups".</i>
<p>iii) Submissions relates to Bullock Harbour and has raised the following:</p> <ul style="list-style-type: none"> <li>• Considers that water-based sports would benefit from access to changing and toilet facilities, boat storage, vehicle access, facilities.</li> <li>• Request encouragement of a land swap with the current owners of the former Western Marine building and provide a thalassotherapy pool (harnessing the healing energy of the ocean) and Marine.</li> <li>• Request utilising the natural rock and landscape by creating a visual land sea rock at Bullock Harbour.</li> </ul>	<p><b><u>B0426</u></b> <b><u>B1256</u></b></p>	4	<p><b>The Executive notes the issues raised which are not County Development Plan issues.</b></p> <p>Bullock is owned and run by Dublin Port. See Section 3.8 for a recommendation in relation to Policy Objective GIB8, and inclusion of reference to the 2020 Masterplan for Bullock and Sandycove Harbours.</p> <p><b>Recommendation</b> See Section 3.8 above for recommendation.</p>
<b>3.9.4.4: Policy Objective OSR12: Dún Laoghaire Recreational Harbour</b>			
<p>i) Submission considers that the harbour should be considered as a public amenity similar to other public parks in the County and the policy should be extended to include the protection and enhancement of recreational and sporting activities (including sailing, racing and competitions of National and European significance) in the County which would align with Policy Objective ORS10: Protection of Sports Grounds/Facilities and Policy Objective OSR11: Water Based Sports.</p> <p>Policy objective ORS12: Dún Laoghaire Recreational Harbour should also be further clarified to also reference 'industrial proposals' as well as commercial shipping, within the harbour.</p>	<p><b><u>B0947</u></b></p>	3	<p>The Executive notes the issues raised.</p> <p>Development in the harbour area will be considered in the forthcoming Dún Laoghaire and Environs Local Area Plan with reference to Policy Objectives ORS10, OSR11 and OSR12.</p> <p>Neither Industry Special or Industry extractive are 'permitted in principle' or 'open for consideration' under the 'W' (waterfront) zoning objective, which pertains to the harbour. Industry light is 'permitted in principle' and science and technology industry are 'open for consideration'.</p> <p>It is recognised that the harbour serves many end users and is home to many facilities be they commercial, tourism related, marine leisure and/or recreational. The 'W' land use zoning which pertains to the harbour area allows for a number of uses which are either permitted in principle or open for consideration. On reviewing Policy Objective OSR12, it is considered that the Policy Objective should be broadened to encompass the impact of <u>any</u> proposal in the harbour and not just commercial shipping and industrial proposals. The impact should also be</p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
			<p>expanded to include impact on tourism facilities in general in the harbour and should not be simply limited to the harbour’s ability to host national and international competitions. This is considered to align with Ports policy, and the role of the harbour, as set out in the RSES.</p> <p><b>Recommendation</b>                      Amend Section 9.4.1.4 Policy Objective OSR12: Dún Laoghaire Recreational Harbour (p. 188) as follows:</p> <p>From:  <i>“Any commercial shipping proposals within Dún Laoghaire Harbour, should ensure that there is no material detrimental impact upon the water based recreational amenity facilities of the Harbour and its ability to host national and international competitions”.</i></p> <p>To:  <i>“Any <del>commercial shipping</del> proposals within Dún Laoghaire Harbour, should ensure that there is no material detrimental impact upon the water based recreational amenity and <u>tourism</u> facilities of the Harbour. <del>and its ability to host national and international competitions</del>”</i></p>
<b>3.9.4.5: Policy Objective OSR13: Play Facilities and Nature Based Play</b>			
<p>ii) Submissions relate to play and policy OSR13 as follows:</p> <ul style="list-style-type: none"> <li>• Welcomes the policy.</li> <li>• Notes that Marlay Park is large enough to support such projects.</li> <li>• Supports the Nature Based Play Philosophy and highlights that the current playground situated in ‘Joey’s’ (i.e. St Joseph’s Football Club), is limited and could do with modernisation.</li> <li>• Children should have protected play spaces.</li> <li>• More emphasis on accessibility of location of playgrounds needed.</li> </ul>	<p><u><b>B0052</b></u>  <u><b>B0326</b></u>  <u><b>B0587</b></u>  <u><b>B0737</b></u>  <u><b>B0941</b></u>  <u><b>B0942</b></u></p>	<p>5</p>	<p>The Executive notes the issue raised and welcomes the support provided. <b>Many of the issues raised are operational matters.</b> Play Facilities and Nature-Based Play will be considered as part of future works to parks such as Marlay Park. The forthcoming DLR Play Policy will highlight the existing facilities in the County, identify any deficiencies and propose improvement, where required.</p> <p>In formulating this response, the Executive has in accordance with Section 12 (8) (b) (iii) of the Planning and Development Act, 2000 (as amended), taken account of the strategic directions received from the members at pre-draft stage, <i>“That the Draft Plan addressed the needs of children and young people in its preparation”</i> and, <i>“That the Chief Executive ensures that inclusivity as a theme permeates through relevant policies of the Draft Plan”.</i></p> <p><b>Recommendation</b>                      Amend Section 9.4.1.5 Policy Objective OSR13: Play Facilities and Nature Based Play (p. 188) as follows:</p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
<ul style="list-style-type: none"> <li>Request that eco-friendly (nature) playground facilities are considered at Arnold Park, Cluny Grove and/or Thomastown Park.</li> </ul>			<p><b>From:</b>  <i>“It is a Policy Objective to support the provision of structured, and unstructured play areas with appropriate equipment and facilities, incorporating and facilitating Nature-based Play with respect to the provision of Play Opportunities throughout the County. These play facilities will also seek to maximise inclusivity and accessibility, to ensure that the needs of all age groups and abilities - children, teenagers, adults and older people – are facilitated in the public parks and open spaces of Dún Laoghaire – Rathdown”.</i></p> <p><b>To:</b>  <i>“It is a Policy Objective to support the provision of structured, and unstructured play areas with appropriate equipment and facilities, incorporating and facilitating Nature-based Play with respect to the provision of Play Opportunities throughout the County, and to support the aspirations of the forthcoming Play Policy prepared within the lifetime of the Plan. These play facilities will also seek to maximise inclusivity and accessibility, to ensure that the needs of all age groups and abilities - children, teenagers, adults and older people – are facilitated in the public parks, open spaces and the public realm of Dún Laoghaire – Rathdown”.</i></p>
<b>3.9.5: Other/Miscellaneous</b>			
<p>i) Submissions relate to litter as follows:</p> <ul style="list-style-type: none"> <li>Requests a National Litter Awareness Campaign.</li> <li>Additional litter bins, and the maintenance of these bins is required in Sandycove. In areas of high usage there is an urgent need to replace the manually operated solar bins with foot/pressure operated bins.</li> <li>Raises issue in relation to need for litter bins and increase cleaning of Dún Laoghaire.</li> <li>Development Plan should review the Council’s policies on littering and graffiti, particularly in respect of litter bin placement</li> </ul>	<p><b><u>B0942</u></b>  <b><u>B0949</u></b>  <b><u>B1155</u></b>  <b><u>B1182</u></b></p>		<p>The Executive notes the issue raised.</p> <p><b>This is an operational issue and not a County Development Plan issue.</b></p> <p><b>Recommendation</b>  No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive’s Opinion & Recommendation
<p>and bins suitable for dog excrement. The practice of painting street furniture appears to be effective in combating graffiti and should be encouraged</p>			



### 3.10: Chapter 10 - Environmental Infrastructure and Flood Risk

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<b>3.10.1: Section 10.2. Water and Waste Water</b>			
<b>3.10.1.1: Section 10.2.2 Water and Waste Water – Policy Objectives</b>			
i) IW note, and welcome, the inclusion of many objectives in Chapter 10 of the Draft County Development Plan that will support the delivery of IW plans, programmes and policies. IW consider that these Policy Objectives E1-01 to E1-11, will also ensure the sustainable management of water and waste water in line with national and regional objectives as stated in the National Planning Framework and the Regional Economic Spatial Strategy for the East and Midlands Region. Also welcomes policies on SuDS and River Basin Management Plan in Chapter 10.	<b><u>B0541</u></b>		The Executive welcomes the support provided.  <b>Recommendation</b> No change to Draft Plan.
ii) Notes that there are problems with flooding and drainage in Rathmichael area. IW still have not completed their Drainage Area Plan for the area.	<b><u>B1220</u></b>		The Executive notes the issues raised.  The completion of the Irish Water Drainage Area Plan is a matter for Irish Water.  <b>Recommendation</b> No change to Draft Plan.
iii) In relation to 10.2.1.2 it is noted that the Water Services Strategic Plan review was completed in 2020.	<b><u>B0541</u></b>		The Executive notes the issue raised.  <b>Recommendation</b> Amend Section 10.2.1.2 Water Service Strategic Plan (2015)  Delete (2015) Add "(2020)" instead.  Delete sentence at end of paragraph that states "The WSSP is due to be reviewed in 2020".
iv) Request that there should be a drainage policy not to permit soakaways adjacent to railway cuttings.	<b><u>B0989</u></b>		The Executive notes the issue raised. The provision of Sustainable Drainage Systems (SuDS) for development proposals are a requirement of the County Development Plan, as stated in

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>Section 12.8.6 and Appendix 7.1. SuDS proposals are assessed in accordance with the policies of the County Development Plan, on a site by site basis. While infiltration of surface water runoff to ground (mimicking existing greenfield conditions) is actively promoted, the soil characterisation based on site investigations will determine the extent to which this objective is achievable, if at all. Proximity to adjacent railway cutting will also be a consideration in assessing site suitability, or not, for infiltration proposals. For sites overlying railway railways the requirements of Iarnród Éireann in its response to the Planning Authority on development proposals vis a vis the protection of its assets will be a determining factor in assessing proposals for infiltration of surface water runoff. Section 12.8.6 should be amended to include reference to the need for referral to Iarnród Éireann.</p> <p><b>Recommendation</b>  Amend section 12.8.6.2. (pg 285) as follows.  Add  <i>The Council will consult as appropriate with Iarnród Éireann in relation to any development where infiltration proposals will be proximity to a railway cutting or tunnel.</i></p>
<p>v) Submission request that DLRCC should include the Groundwater Protection Scheme information within the Plan via a combination of the land mapping provided in the submission and the groundwater protection responses for potentially polluting activities available on the GSI website.</p>	<b>B0249</b>		<p>The Executive notes and welcomes the observation. Groundwater protection is covered under Policy Objective 10.2.2.8. The Policy Objective includes the relevant statutory elements which include the EU Directive and regulations. The amendment proposed below in relation to the removal of SLO 93 recommends inclusion of the sources of data and mapping available on the GSI database.</p> <p><b>Recommendation</b>  See recommendation below in relation to removal of SLO 93 which includes reference to the GSI mapping and date in the proposed amendment.</p>
<p>vi) IFA requests DLR to acknowledge that every farmer in the County has a right to bore a well on his land. Where DLR maintain a bore hole for public use, any restrictions on a landowner in that area needs to be dealt with and proper compensation for income and capital loss needs to be addressed.</p>	<b>B0302</b>		<p>The Executive notes the issue raised.</p> <p><b>This is not a County Development Plan issue.</b> This is a matter for Irish Water. Dún Laoghaire-Rathdown County Council is no longer the statutory body for maintaining public water supplies including boreholes used for extraction of water for use a public water supply. Measures and policies for the protection of groundwater and aquifers whether used or not for public water usage including land use restrictions are set by legislation.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p><b>Recommendation</b> No change to Draft Plan.</p>
<p>vii) It is essential that IFI be contacted in relation to all works that may have an impact on surface waters.</p> <p>Consider it essential that areas adjacent to waterways (riparian buffer zones) are managed in a manner which will lessen impacts to habitats. Currently the EPA has classified the Shanganagh and Carrickmines system as moderate status (3-4). Excessive siltation and compaction of the instream substrate was observed. Extensive construction is being carried out within this catchment and IFI welcomes plans stated in the County Development Plan such as creating buffer strips along the Carrickmines River which will help protect the system.</p>	<b>B0131</b>		<p>The Executive notes the issues raised.</p> <p>Policy Objective GIB24: Rivers and Waterways already states that <i>“The Council shall consult, as appropriate, with Inland Fisheries Ireland in relation to any development that could potentially impact on the aquatic ecosystems and associated riparian habitats, wildlife corridors and/or salmonid waters”</i>.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>viii) Concerns that the Local Network Reinforcement Project will serve new residential development, whereas existing residences, that are currently operating on private sewerage plants (In Old Connaught area), should link into the public system first.</p>	<b>B0450</b>	14	<p>The Executive notes the issue raised. <b>This is a matter for Irish Water.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ix) Water and foul drainage systems should be developed first to support the additional population arising from the new residential units.</p>	<b>B0450</b>	14	<p>The Executive notes the issue raised.</p> <p>Provision of infrastructure before provision of units is a central tenet of the Draft Plan. Appendix 1 Tiered Approach to Land Zoning – Infrastructure Assessment sets out a detailed assessment of the required infrastructures to support lands identified for development. Policy Objective EI2: Irish Water Enabling Policies also sets out the Council's commitment to working with Irish Water to ensure provision of infrastructure required to service settlements in accordance with the core strategy. Th A1 land use zoning objective – To provide for new communities and Sustainable Neighbourhood Infrastructure in accordance with approved local area plans – ensures that development will take place in accordance with Local Area Plans which will incorporate phasing plans linking development with the commensurate delivery of supporting infrastructure</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p><b>Recommendation</b> No change to Draft Plan.</p>
<p>x) Wastewater management facilities in the County need to be enhanced.</p>	<p><b>B0905</b></p>		<p>The Executive notes the issues raised.</p> <p>Policy objective EI3: Wastewater Treatment Systems of the Draft Plan states <i>"It is a Policy Objective that all new developments in areas served by a public foul sewerage network connect to the public sewerage system, either directly or indirectly. It is a Policy Objective to promote the changeover from septic tanks to collection networks where this is feasible and to strongly discourage the provision of individual septic tanks and domestic wastewater treatment systems in order to minimise the risk of groundwater pollution."</i></p> <p>Furthermore, EI1: Sustainable Management of Water states <i>"It is a Policy Objective to work with Irish Water to continue the development and improvement of the water supply and wastewater systems throughout Dún Laoghaire-Rathdown in order to meet the anticipated water and wastewater requirements of the County."</i></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xi) Unregulated water abstraction may have significant ecological implications if large volumes of water are abstracted over a short period of time from small nursery or spawning streams. It is imperative that Dún Laoghaire County Council maintain an abstraction register.</p>	<p><b>B0131</b></p>		<p>The Executive notes the issues raised. The European Union (Water Policy) (Abstractions Registration) Regulations 2018 (S.I. No. 261 of 2018) require that abstractions of greater than 25,000 litres per day be registered through the EPA EDEN portal. <b>Whilst this is not a County Development Plan issue</b> DLR investigates river water abstractions and assesses them for significance in relation to their impact on the river in question. It is policy to record significant abstractions (in excess of 25,000 litres per day) in an Abstraction Register. Currently, DLR is not aware of any significant abstractions. Given the small sizes of the streams and river in DLR, water abstractions (for animal water supplies, construction works, power generation, etc) represent a potential risk to the viability of these water bodies as nursery and spawning streams.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>xii) In support of Chapter 10 however there should be a stronger policy for 10.2.2.10 and 10.4.3 due to sewage overflow and the impact on swimming.</p>	<p><b><u>B0587</u></b></p>		<p>The Executive notes the issue raised. Policy Objective 10.2.2.10 states that <i>“It is a Policy Objective to work alongside Irish Water to minimise the number and frequency of storm overflows of sewage to watercourses”</i> and further states that <i>“Stormwater overflows can have significant negative impacts on receiving waters in terms of both water quality and flooding. The Council, in conjunction with Irish Water, will endeavor to ensure Best Management Practices are utilised to protect receiving waters”</i>.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p><b>3.10.1.2: Policy Objective EI11: Rathmichael Groundwater and Surface Water Protection</b></p>			
<p>i) Remove or revise SLO 93.</p> <p>The 2021 EPA Wastewater Code of Practice eliminates the need for this SLO as it provides up-to-date guidance on how to deal with wastewater and groundwater situations, including those present in Rathmichael.</p> <p>AquaGeoServices found in its 2015 report to DLRC that the chemical status of the water in the Rathmichael/Crinken stream was “at risk”. However, the current online EPA map database gives the status of the Rathmichael/Crinken stream as “good”. This significant improvement indicates that the current density of septic tanks in the area, which is less than 1 per 125ha and hence relatively low, is not posing a chemical pollution hazard.</p> <p>The Aqua GeoServices report does strongly indicate that the potential problems in the Rathmichael/Crinken stream are related to direct discharges through piped drainage as well as forestry and land use, such as agriculture and golf courses. Septic tanks/on site systems per se are not</p>	<p><b><u>B0249</u></b> <b><u>B0515</u></b> <b><u>B0522</u></b> <b><u>B0556</u></b> <b><u>B0602</u></b> <b><u>B0677</u></b> <b><u>B0683</u></b> <b><u>B0684</u></b> <b><u>B0714</u></b> <b><u>B0728</u></b> <b><u>B0793</u></b> <b><u>B0900</u></b> <b><u>B0986</u></b> <b><u>B1030</u></b> <b><u>B1050</u></b> <b><u>B1118</u></b> <b><u>B1225</u></b></p>	<p>10, 14</p>	<p>The Executive notes the issues raised.</p> <p>The prohibition on development in the Rathmichael area was introduced arising from water quality issues first identified in 2009/2010. Monitoring was carried out on a regular basis and the SLO was carried forward into the 2016 Plan as there were still concerns arising. Since 2016, much work has been carried out by the Council to address domestic misconnections.</p> <p>In preparation for the County Development Plan 2022-2028, and following from investigations undertaken by Council and resolution of the problems identified in those investigations, sampling of watercourses in the catchment recommenced in the summer of 2019 with a view to obtaining a full year’s sampling for analysis and subsequent reporting. Unfortunately, from March 2020 onwards the ability to carry out further monitoring and investigations was severely hampered by Covid 19 restrictions. A decision was made to retain the existing SLO126 (renamed as SLO 93) in the Draft County Development Plan as the Council was not, at that stage, in a position to bring forward policy proposals that would have met with the required level of certainty. An updated report by the Council’s consultants was received in June 2021 by the Council and following from conclusions contained in that report the Council now proposes to remove proposed SLO 93.</p> <p>There has also been a recent release of a new Code of Practice for Domestic Wastewater Treatment Systems by the EPA, which now provides solutions for clay-rich areas that would have previously been deemed unsuitable for discharge to groundwater.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>identified as a cause of the poor quality in the stream.</p> <p>The prevention of pollution of the Rathmichael/ Crinken stream or the underlying bedrock aquifer should be addressed on a case by case basis using the 2021 EPA Wastewater Code of Practice to address the groundwater concerns, thereby enabling planning permissions to be granted.</p>			<p>As a result the overall policy on single wastewater treatment systems requires strengthening in response to updated guidance documents and to ensure no adverse environmental effects in unsewered areas that include Rathmichael, Kiltiernan and Glencullen. Particular requirements for development proposals in all unsewered areas, including the Rathmichael area formerly covered by SLO 93, are recommended for addition to the written statement under section 10.2.2.3 and a new section in Chapter 12 Development Management.</p> <p><b>Recommendation</b>  <i>Remove SLO 93 from Chapter 14 Specific Local Objectives, amend maps 10 and 14 To refuse planning permission for any new developments, which include on-site wastewater treatment facilities within this catchment, until the groundwater issues in the area are resolved or ameliorated.</i></p> <p><i>Update Section 10.2.2.3 from:</i>  <b>10.2.2.3 Policy Objective EI3: Wastewater Treatment Systems</b>  <i>It is a Policy Objective that all new developments in areas served by a public foul sewerage network connect to the public sewerage system, either directly or indirectly.</i>  <i>It is a Policy Objective to promote the changeover from septic tanks to collection networks where this is feasible and to strongly discourage the provision of individual septic tanks and domestic wastewater treatment systems in order to minimise the risk of groundwater pollution.</i>  <i>Consideration of domestic wastewater treatment systems in those areas not served by a public foul sewerage system will be subject to full compliance with the EPA Code of Practice Wastewater Treatment and Disposal Systems Serving Single Houses (P.E. 10) (2021), as may be amended or updated.</i>  <i>Consideration of non-domestic wastewater treatment systems in those areas not served by a public foul sewerage system will be subject to full compliance with EPA Wastewater Treatment Manuals (‘Treatment Systems for Small Communities, Business, Leisure Centres and Hotels’).</i>  <i>Wastewater treatment systems shall be located entirely within the site boundary.</i>  <i>The Council will liaise with Irish Water to ensure compliance with existing licenses, the Urban Waste Water Directive and the EU Habitats Directive.</i></p> <p><i>to:</i>  <b>10.2.2.3 Policy Objective EI3: Wastewater Treatment Systems</b>  <i>It is a Policy Objective that all new developments in areas served by a public foul sewerage network connect to the public sewerage system, either directly or indirectly.</i></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><i>It is a Policy Objective to promote the changeover from septic tanks to collection networks where this is feasible and to strongly discourage the provision of individual septic tanks and domestic wastewater treatment systems in order to minimise the risk of groundwater <u>and surface water pollution.</u></i></p> <p><i><u>It is a Policy Objective to prohibit multiple dwelling units discharging to communal wastewater treatment systems.</u></i></p> <p><i>Consideration of <u>single dwelling domestic wastewater treatment systems</u> in those areas not served by a public foul sewerage system will be subject to full compliance with the EPA Code of Practice Domestic Wastewater Treatment Systems <del>and Disposal Systems Serving Single Houses</del> (Population Equivalent <math>\leq 10</math>) (March 2021), as may be amended or updated.</i></p> <p><i>Consideration of non-domestic wastewater treatment systems in those areas not served by a public foul sewerage system will be subject to full compliance with EPA Wastewater Treatment Manuals (‘Treatment Systems for Small Communities, Business, Leisure Centres and Hotels’). Wastewater treatment systems shall be located entirely within the site boundary.</i></p> <p><i>The Council will liaise with Irish Water to ensure compliance with existing licenses, the Urban Waste water Directive and the EU Habitats Directive.</i></p> <p><i><u>See section 12.10.3 Waste Water Treatment Systems for detailed requirements.</u></i></p> <p>Insert new section in Chapter 12 as follows</p> <p><u>12.10.3 Waste Water Treatment Systems</u></p> <p><b><u>12.10.3.1 Single dwelling domestic wastewater treatment systems</u></b></p> <p><i><u>Consideration of single dwelling domestic wastewater treatment systems in those areas not served by a public foul sewerage system will be subject to full compliance with the EPA Code of Practice Domestic Wastewater Treatment Systems (Population Equivalent <math>\leq 10</math>) (March 2021), as may be amended or updated.</u></i></p> <p><i><u>A site suitability assessment shall be undertaken in accordance with the EPA Code of Practice Domestic Wastewater Treatment Systems (Population Equivalent <math>\leq 10</math>) (March 2021), for new systems or upgrades of a system on an existing house.</u></i></p> <p><i><u>In addition, for new development(s) located in areas of “high” to “extreme” groundwater vulnerability (this includes areas in Rathmichael, Kiltiernan and Glencullen and may include other areas in the County) and where the provision of a single wastewater density of Domestic Wastewater Treatment Systems (DWWTS) results in a density of higher than 6 per hectare further assessment is required including::</u></i></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<ul style="list-style-type: none"> <li>• <u>The potential impact of the proposed system should be further assessed to show that the accumulative loading would not have a negative impact on groundwater quality, particularly with respect to E. coli and nitrate.</u></li> <li>• <u>In such cases, more detailed hydrogeological investigations should be carried out by a competent and experienced hydrogeologist to demonstrate that the site is suitable for a DWWTS.</u></li> <li>• <u>Particular attention should also be paid to the potential impact that the proposed DWWTSs may have on watercourses, drains/ditches, ponds/lakes and foreshore, depending on the location of the site.</u></li> <li>• <u>In larger scale residential developments within areas of "high" to "extreme" groundwater vulnerability, the hydrogeological assessment should be conservative and take into consideration the potential impact that the overall proposed development may have on groundwater and surface water.</u></li> <li>• <u>For clarity in determining the 6 per hectare density, only the areas within the immediate site boundaries of dwellings in close proximity to prospective sites shall be calculable.</u></li> </ul> <p><b><u>12.10.2.2 Non-domestic wastewater treatment systems</u></b></p> <p><u>Consideration of non-domestic wastewater treatment systems in those areas not served by a public foul sewerage system will be subject to full compliance with EPA Wastewater Treatment Manuals ('Treatment Systems for Small Communities, Business, Leisure Centres and Hotels'). In areas of high to extreme groundwater vulnerability (this includes areas in Rathmichael, Kiltiernan and Glencullen and may include other areas in the County), further hydrogeological assessment shall be undertaken by a competent and experienced hydrogeologist, which assessment should demonstrate to the satisfaction of Dún Laoghaire-Rathdown County Council that the proposed treatment system serving the proposed development will not have any detrimental effect on surface water or groundwater quality.</u></p> <ul style="list-style-type: none"> <li>• <u>Should the proposed discharge be greater than 5m<sup>3</sup>/d, a discharge licence to groundwater will be required and a successful assimilative capacity assessment will have to be undertaken in line with the EPA (2011) "Guidance on the Authorisation of Discharges to Groundwater". The tier of assessment (i.e. 2 or 3) required will be dependent on the potential risk of impact and the proposed daily discharge.</u></li> <li>• <u>Should a discharge to surface water be considered or should surface water be considered as a receptor at risk, the assimilative capacity should follow the technical</u></li> </ul>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><i>rules established in the "Guidance, Procedures and Training on the Licensing of Discharges to Surface Waters" (Water Services National Training Group, 2011)".</i></p> <p><i>Information on Groundwater data mapping and Groundwater protection responses are available on the GSI website (<a href="https://www.qsi.ie">https://www.qsi.ie</a>) and Appendix E of the EPA Code of Practice Domestic Wastewater Treatment Systems (Population Equivalent ≤ 10) (March 2021) and should be used as a resource tool.</i></p> <p><i>Wastewater treatment systems shall be located entirely within the site boundary.</i></p> <p><i>The Council will liaise with Irish Water to ensure compliance with existing licenses, the Urban Waste water Directive and the EU Habitats Directive.</i></p>
<p><b>3.10.2: Section 10.3 Waste</b></p>			
<p><b>3.10.2.1: Section 10.3.1.1 Circular Economy</b></p>			
<p>i) Considers that the circular economy should be considered in relation to the reduction and reuse of waste through the procurement and delivery of services.</p> <p>Should consider re-wording references to ‘Waste Management’ and replacing it with ‘Circular Economy’ so there is a shift in understanding and emphasis moving from waste to circularity or consider the inclusion of a standalone Chapter on Circularity, providing for waste re-use as a concept from, cradle to cradle, which is the linchpin of decarbonisation.</p>	<p><b>B1047</b> <b>B1088</b></p>		<p>The Executive notes the issues raised and agrees with the sentiments.</p> <p>The Draft Plan, in line with the NPF and the RSES, endorses a transition towards the principles of a circular economy, facilitating the use of materials at their highest value for as long as possible and then recycling or reusing them at the end of their service life with the end result being the generation of minimal waste. Figure 10.1 of the Draft Plan explains the Circular Economy approach.</p> <p>The waste management Policy Objectives contained within the Draft Plan are predicated on the Government’s ‘A Waste Action Plan for a Circular Economy 2020-2025’ and the EU Water Hierarchy of prevention, preparing for re-use, recycling, energy recovery ad sustainable disposal. In particular, Policy Objectives E11: Sustainable Management of Water, E12: Resource Management and E13: Waste Management Infrastructure, Prevention, Reduction, Reuse and Recycling make specific reference to the circular economy and therefore this term has already been embraced within the waste management Policy Objectives. Policy Objective E12 is entitled Resource Management as opposed to Waste Management. It is recommended the title of Policy Objective E13 be amended to include circular economy.</p> <p><b>Recommendation</b> Amend Policy Objective E13 (pg 198) from <i>10.3.2.2 Policy Objective E13: Waste Management Infrastructure, Prevention, Reduction, Reuse and Recycling</i> To</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<i>10.3.2.2 Policy Objective EI13: Waste Management Infrastructure, Prevention, Reduction, Reuse and Recycling (Circular Economy approach)</i>			
<b>3.10.2.2: Section 10.3.2 Waste - Policy Objectives</b>			
i) DLRCC could take the following actions: <ul style="list-style-type: none"> <li>• Planning permission should be required for any hard surfaces over a certain scale.</li> <li>• Buildings to re-use grey water and ensure water butts used for gardening.</li> <li>• Encouragement of reduce, reuse, recycle.</li> <li>• Use of solar panels and white roofs.</li> <li>• Noise/vibration/pollution – impact assessments to be carried out.</li> </ul>	<b><u>B0314</u></b>	10	The Executive notes the issues raised. The requirements as to whether something requires planning permission is subject to planning legislation. There are a number of Policy Objectives in the Draft Plan which support the issues raised, including that is Council policy to encourage the advancement of rain water harvesting systems, grey water re-use systems and other water conservation measures in the County, in accordance with best practice and subject to compliance with Ministerial Guidelines / Regulations. Furthermore, the waste management Policy Objectives contained within the Draft Plan, which include Policy Objective EI13: Waste Management Infrastructure, Prevention, Reduction, Reuse and Recycling are predicated on the Government's 'A Waste Action Plan for a Circular Economy 2020 – 2025' and the EU Waste Hierarchy of prevention, preparing for re-use, recycling, energy recovery and sustainable disposal. Other Policy Objectives in the Draft Plan which are relevant to the issues raised include Policy Objective CA13: Solar Energy Infrastructure and EI15: Air and Noise Pollution.  <b>Recommendation</b> No change to Draft Plan.
<b>3.10.2.3: Policy Objective EI13: Waste Management Infrastructure, Prevention, Reduction, Reuse and Recycling</b>			
i) No reference to food waste in the Plan. Measures recommended to tackle food waste which should be implemented by DLRCC.	<b><u>B0627</u></b>		The Executive notes the issue raised. <b>This is not a County Development Plan issue.</b>  <b>Recommendation</b> No change to Draft Plan.
ii) There is an urgent need to improve the range of materials that can be collected for reuse or recycling. Request that the County develop plans for reducing the use of plastic in all forms and reflects this intent in the County Development Plan.	<b><u>B0271</u></b>		The Executive notes the issue raised.  The Draft Plan contains a number of Policy Objectives in relation to the management of waste including Policy Objective EI12: Resource Management and EI13: Waste Management Infrastructure, Prevention, Reduction, Reuse and Recycling which also endorse a transition towards the principles of a circular economy, facilitating the use of materials at their highest value for as long as possible and then recycling or reusing them at the end of their service life with the end result being the generation of minimal waste.

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) There should be more recycling facilities, across the County, specifically facilities that are easily accessible on foot.</p> <p>In support of the development of a wide network of multi-material recycling centres.</p>	<p><u>B0905</u> <u>B0587</u></p>		<p>The Executive notes the issues raised.</p> <p>There are three Recycling Centres and 37 Bring Centres in the County. Should demand increase waste management would look to provide additional Bring Centres in suitable locations. The Draft Plan contains policy "To provide for civic amenity facilities and bring centres as part of an integrated waste collection system in accessible locations throughout the County" and specifically "To require the inclusion of such centres in all large retail developments to maximise access by the public"</p> <p>Bring Centres are defined in Chapter 13 and are then included as a use under umbrella term public services which are permitted in principle land use zones -A, A1, B, TLI, DC, MTC, NC, E, W, A2, LIW, MIC, MOC, SNI and OE, and open for consideration in the following land use zones, - G, GB, F,</p> <p>It is noted that there is an amorality in that bring centres are specifically named as open for consideration in the zoning objective. As they are already covered by public services which are also permitted in principle in the SNI zone this should be removed as it could have the potential to create confusion in that they are not specifically mentioned in other land use zoning objective areas.</p> <p><b>Recommendation</b> Amend table 13.1.7. in Chapter 13 as follows Omit: <i>Bring banks/Bring Centres,</i></p>
<p>iv) Submission(s) seek the increase of public litter bins including segregated waste bins and solutions to dog fouling, including in the Glashule area and along the Dodder.</p> <p>Request the following:</p> <ul style="list-style-type: none"> <li>stronger penalties to tackle litter dumping</li> <li>Enforcement of anti-littering laws</li> </ul>	<p><u>B0302</u> <u>B1075</u> <u>B1147</u> <u>B1085</u></p>		<p><b>The Executive notes the issues raised many of which including penalties and public messaging are operational matters and do not relate to the Draft Development Plan.</b></p> <p>Notwithstanding, the Councils Litter Management Plan 2018-2020 is a 3-year plan which sets out the Councils policy and actions on litter control. Whilst not a strategic County Development Plan issue, approximately 400 bins are located throughout all areas of the County to provide the optimum service from a finite resource. Bin distribution is concentrated around certain areas and their placement is based on set criteria which prioritises areas close</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> <li>Changes to litter legislation (remove the threat of fines and persecution of farmers on whose land others dump)</li> <li>Establish a network of strategically located skips on outskirts of towns/villages.</li> <li>Public campaign for anti-littering in the countryside.</li> </ul>			<p>to schools, shops and shopping centres and to a lesser extent around or near some civic amenities. Bin collection are automatically requested via the internal bin telemetry and collection list outputted daily or as required with collection conducted 7 days a week. There is a large problem with illegal dumping of household waste which often leads to blocked or overflowing bins.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.10.3: Section 10.4 Pollution</b>			
<b>3.10.3.1: Policy Objective E115: Air and Noise Pollution</b>			
<p>i) Request monitoring of air pollution on Dundrum Main Street and Bypass noting the threat to health, proximity to schools.</p> <p><i>Policy Objective E115 Air and Noise pollution</i> Both can be reduced by more active travel and less car use, reducing speed limits to 30 km/h in all built up areas and around all schools. Additional air monitors on main roads are needed.</p>	<p><b>B0271</b> <b>B0406</b></p>		<p>The Executive notes the issues raised and agrees with the sentiments. The overall policy thrust of the Draft Plan in the Transport and Mobility Chapter relates to promoting more active travel and less car use. <b>The monitoring of air pollution and the setting of traffic speed limits are not strategic County Development Plan issues.</b></p> <p>With regard to air pollution, the Environmental Protection Agency (EPA) are the lead agency in Ireland to meet the obligations under the Ambient Air Quality and Clean Air for Europe Directive (CAFE). The identification of locations and the provision of air monitors in the Dublin area are carried out by the EPA and not the Council, with secondary monitoring carried out by Transport Infrastructure Ireland (TII). No evidence exists to suggest any current requirement for additional air monitoring.</p> <p>With regard to noise, DLR County Council adopted the 'Dublin Agglomeration Environmental Noise Action Plan 2018 – 2023' in December 2018. The key objective of the Noise Action Plan is to avoid, prevent and reduce, where necessary, on a prioritised basis the harmful effects including annoyance, due to long-term exposure to environmental noise. Mitigation measures regarding noise pollution may be applied as part of a planning application, where feasible and necessary, as part of the Development Management process</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission raises issue in relation to permits for street vendors around the County and that considers that they should not be issue to those</p>	<p><b>B0844</b></p>		<p>The Executive notes the issue raised. <b>The provision of street permits, air monitoring and the installation of electricity supply to street vendors are not a strategic County Development Plan issues.</b></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
using (combustion engine/generator which cause pollution.			<p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.10.3.2: Policy Objective E116: Light Pollution</b>			
<p>i) Policy Objective E116: Light Pollution Support the statement to limit light pollution which should be improved by the use of modern LED lanterns.</p> <p>Recommends warm white LED lighting with a CCT of 3,000K for residential areas - as well as the introduction of trimming and dimming.</p> <p>Seeking a review of current programme of LEDs replacing older street lamps and adapting programmes in line with expert advice (national dark sky scientific group</p> <p>Request a stronger policy on light pollution, which takes into account the serious impacts on biodiversity and human health of inappropriate night-time light levels.</p>	<p><b><u>B1112</u></b> <b><u>B0271</u></b></p>		<p>The Executive notes the issues raised.</p> <p>There is an ongoing upgrading programme with all street lights in DLR and all new lanterns LED with full cut-off over 90 degrees. Obtrusive light is an ongoing concern of the Public Lighting Section and all lighting installations are designed to minimise obtrusive light while maximising the light reaching the footpaths and roads in the County. All lighting is designed to EN13201:2015. There is a general reduction of 50% (or more) in real lighting levels from the LED lanterns but as the light produced is a full spectrum light source it allows for 100% of our eye to utilise the light, thus appearing to be brighter even with a large decrease in light levels. The LED lanterns are also dimming between 12 midnight and 6am to further reduce light output in guidance and conformity to the lighting standards. It is considered that Policy Objective E116 adequately addresses impacts on biodiversity and health.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.10.3.3: Policy Objective E117: Water Pollution</b>			
<p>i) Requests monitoring road runoff into rivers (especially the Slang) as it can be a serious cause of pollution. Draft County Development Plan 10.4.3 PO E117 refers to complying with national and EU directives etc. "DLR will endeavour (not 'will') to improve the water quality in rivers and other watercourses, including ground water".</p>	<p><b><u>B0271</u></b></p>		<p>The Executive notes the issue raised. The specific monitoring of road runoff into the River Slang is an operational matter. The Slang is sampled at strategic locations along its length as part of the Water Pollution Control Section's River Sampling Programme.</p> <p>Policy objective E117: Water Pollution states "<i>It is a Policy Objective to implement the provisions of water pollution abatement measures in accordance with national and EU Directives and other legislative requirements in conjunction with other agencies as appropriate.</i>"</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<b>3.10.4: Section 10.5 Energy Policies</b>			
i) EirGrid notes and welcomes reference and emphasis placed on electricity transmission in the Draft Development Plan, particularly Section 10.5 which details Energy Policies.	<b><u>B0584</u></b>		The Executive welcomes the support received.  <b>Recommendation</b> No change to Draft Plan.
<b>3.10.4.1: Policy Objective EI19: Energy Facilities</b>			
i) Policy Objective EI19: Energy Facilities Request that Policy Objective should recognise that other statutory agencies outside of EirGrid and ESB also have responsibility for development of electricity transmission infrastructure.  Supports retention of EI19 and the retention of support for route corridor protection in section 10.5, where it states; <i>"...where strategic route corridors have been identified, to support the statutory providers of national grid infrastructure by safeguarding such strategic corridors from encroachment by other developments that might compromise the provision of energy networks."</i>	<b><u>B0600</u></b> <b><u>B0612</u></b> <b><u>B0877</u></b>		The Executive notes the issue raised.  Policy Objective EI19: Energy Facilities states that <i>"the Council will facilitate the expansion of the existing service providers, notably Bord Gáis, Eirgrid and the Electricity Supply Board (ESB), in order to ensure satisfactory levels of supply and to minimise constraints for development."</i> The Policy Objective is not limited to the stated service providers, however it mentions these as they are the major service providers in the County.  <b>Recommendation</b> No change to Draft Plan.
<b>3.10.4.2: Policy Objective EI20: Overhead Cables</b>			
i) Policy Objective EI20 Overhead Cables (national roads and Luas). TII recommends that an assessment of all alternatives for grid/cable connection routing should be undertaken. It is considered inappropriate to only consider utilising the strategic national road network or Luas line as a grid connection route when alternatives are available.	<b><u>B0192</u></b>		The Executive notes the issue raised.  To date the Executive are not aware that any proposals in the County for ungrounding of cables have only considered utilising the strategic national road network or Luas line as a grid connection route as stated in the submission. Local roads, public and private lands option are also usually examined depending on the specifics of any undergrounding. Various options would be examined in any detailed feasibility and design study and then those options are balanced up having regard to surface water drainage, archaeology, environmental and other impacts including impacts on material assets. This is considered to be an issue for discussion between TII and the providers carrying out the undergrounding at design stage when

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>alternatives would be examined as opposed to a higher level County Development Plan policy issue</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) EirGrid understands the principle underlying objective Policy EI20 in Section 10.5.2 and will always examine the feasibility for same. However, it is not always possible for high voltage transmission infrastructure to be located underground for a variety of reasons - technical, economic and environmental. EirGrid would ask the council to review and exclude transmission infrastructure under this objective.</p>	<b><u>B0584</u></b>		<p>The Executive notes the issue raised.</p> <p>Overhead cables detract from visual amenity and therefore it is Council policy to seek the placing underground of cables which is outlined in Policy Objective EI20: Overhead Cables. The final decision on whether to proceed with any undergrounding is made by the relevant statutory undertaker and not the County Council.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submission suggests a wording change to Policy Objective EI 20: Overhead Cables and refers to numerous examples of such from other Local Authorities.</p>	<b><u>B0594</u></b>		<p>The Executive notes the issues raised in this comprehensive submission. It is considered that existing Policy Objective EI 20: Overhead Cables in the Draft Plan is sufficiently robust and deliberately worded to achieve the aims of the Council with regard to Overhead Cables.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Submission suggests insertion of three new policies based on County Development Plans of other County Councils in relation to transmission lines in scenic areas, impact of transition lines on heritage sits and sites of environmental importance and landscape and visual assessments.</p>	<b><u>B0594</u></b>		<p>The Executive notes the issues raised in this comprehensive submission. However, it is considered that existing Policy Objective EI 20: Overhead Cables is sufficiently robust and deliberately worded to achieve the aims of the Council with regard to Overhead Cables and that additional policies in this regard are neither required nor necessary. The Draft Plan already covers the requirements for landscape and visual assessments in section 12.7.4 of the Draft Plan which states that <i>"Planning applications that have the potential to adversely impact upon landscapes attributed with a High Amenity Zoning Objective - or upon Protected Views or Prospects - shall be accompanied by an assessment of the potential landscape and visual impacts of the proposed development, including photomontages – demonstrating that landscape impacts have been anticipated and avoided to a level consistent with the sensitivity of the landscape."</i></p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<b>3.10.5: Section 10.6 Telecommunications</b>			
i) Supports the approach to telecommunications infrastructure in the Draft. Indicates that they will need additional masts to facilitate the roll-out of ESB's 'Smart Metering' project. The successful delivery of 'smart metering' is a central component of Ireland's plan to combat climate change through the reduction of unnecessary energy usage.	<b>B0877</b>		<p>The Executive notes the issue raised. Policy objective EI21: Telecommunications Infrastructure supports the requirement of enhanced ICT infrastructure as it states: <i>"It is a Policy Objective to promote and facilitate the provision of an appropriate telecommunications infrastructure, including broadband connectivity and other technologies, within the County."</i></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
ii) Remote/home working will form a major part of the future work model and employees will require enhanced infrastructure, including sustainable ICT infrastructure.	<b>B0840</b>		<p>The Executive notes the issue raised. Policy objective EI21: Telecommunications Infrastructure supports the issue of remote working and the requirement of enhanced ICT infrastructure as it states: <i>"It is a Policy Objective to promote and facilitate the provision of an appropriate telecommunications infrastructure, including broadband connectivity and other technologies, within the County."</i></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
iii) Submission suggests insertion of one additional Policy Objective based South Dublin County Development Plan in relation to public Rights of Way and telecommunication developments.	<b>B0594</b>		<p>The Executive notes the issues raised in this comprehensive submission and consider that it is already covered in the Draft Plan. Section 12.9.8 Telecommunications states that <i>"In the consideration of proposals for telecommunications antennae and support structures, applicants will be required to demonstrate...any impacts on rights-of-way and walking"</i></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.10.6: Section 10.7 Flood Risk</b>			
<b>3.10.6.1: Policy Objective EI22: Catchment Flood Risk Assessment and Management (CFRAM)</b>			
i) Note Policy Objective EI22: Catchment Flood Risk Assessment and Management (CFRAM). Concern that new development will increase run off into the River Slang. It is important that all developments within the pluvial run off area of the river be assessed to ensure that existing threats of flooding are not exasperated. In addition, bridges on the River Slang should be assessed for potential of	<b>B1125</b>		<p>The Executive notes the issue raised.</p> <p>All new development must limit their discharge to Green Field run-off rates, also known as Qbar, or 2l/s/ha. More detail regarding requirements for Development is provided in Appendix 7 of the County Development Plan.</p> <p>New developments are also required to undertake a Site Specific Flood Risk Assessment, in accordance with Appendix 16 of the County Development Plan. This ensures that flood risk is</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
blockage and remedial works undertaken to manage such a risk			<p>avoided where possible and mitigated where required to prevent increased flood risk elsewhere. Management of watercourses, unless in public areas, are the responsibility of the riparian landowners.</p> <p><b>Recommendation</b> No Change to Draft Plan.</p>
ii) The data from the national Groundwater Flooding project may be useful in relation to Flood Risk Assessment (FRA) and management plans.	<b><u>B0249</u></b>		<p>The Executive notes the issue raised.</p> <p>The new section 12.10.3.2 makes reference to the datasets available on the Geological Survey Ireland website. (see response above)</p> <p><b>Recommendation</b> No Change to Draft Plan.</p>
<p>iii) Any new builds should have significant architectural planning to prevent flooding at lower levels caused by the removal of hedgerows, trees and installation of tarmac, and wind evaluations for safety.</p> <p>Any new developments should take account of past flooding to prevent future flooding.</p>	<b><u>B0737</u></b> <b><u>B0710</u></b>		<p>The Executive notes the issue raised.</p> <p>Planning applications are considered under the Development Management process, where issues such as flood risk, are taken into consideration in the planning assessment.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.10.7: Section 10.8 Coastal protection</b>			
<b>3.10.7.1: Policy Objective EI25: Coastal Defence</b>			
i) Considers that it is important that the Fisheries Service is involved at as early a stage as possible in relation to any coastal protection works and their impact on local fishery amenities.	<b><u>B0131</u></b>		<p>The Executive notes the issue raised. As referenced in other responses the requirement to consult with inland fisheries is set out in the Draft Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
ii) Geohazards eg. Flooding, coastal erosion, can cause widespread damage to landscapes, wildlife, human property and human life. Recommend that geohazards be taken into consideration, especially when developing areas where these risks are prevalent.	<b><u>B0249</u></b>		<p>The Executive notes the issue raised. Flooding and coastal erosion are taken into account in the assessment of planning applications and GSI sources would be used by applicants.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>



### 3.11: Chapter 11- Heritage and Conservation

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<b>3.11.1: Section 11.1 Introduction</b>			
<p>iii) Our heritage needs to be properly protected, promoted and to the greatest extent possible accessible.</p> <p>Built heritage should be considered as an integral part of the wider built environment and should be dealt with holistically throughout the plan. Submission considers that the approach of making built heritage integral to other areas of the plan is not evident</p> <p>Sufficient mention of built heritage as part of the town centre renewal frameworks has not been made. Submission requests a Policy Objective relating to same.</p>	<p><b><u>B0942</u></b> <b><u>B1247</u></b></p>		<p>The Executive notes the issues raised.</p> <p>The Draft Plan includes many Policy Objectives and specific local objectives which address Heritage. It is considered that heritage is dealt with in a holistic and integral fashion throughout the Plan. In relation to the role of heritage in urban regeneration, Section 3.7 sets out a recommended amendment in relation to the <i>Town Centre First Policy Approach</i> which aims to promote the heritage-led regeneration of Ireland's historic towns.</p> <p><b>Recommendation</b> See section 3.7 for recommended amendment in relation to the <i>Town Centre First Policy Approach</i>.</p>
<p>iv) Submission welcomes the policies outlined in Chapter 11 and in particular HER1, HER2, HER5, HER7, HER9, HER12, HER19, HER20 - HER23, HER 25.</p>	<p><b><u>B0052</u></b> <b><u>B0942</u></b></p>		<p>The Executive welcomes the support provided.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>v) Submission requests the inclusion of a subsection within Chapter 11 with respect to 'World Heritage Site' for the Council to:</p> <p>“Undertake a feasibility study to report on areas considered worthy of inclusion in the Tentative List to report within two years of the adoption of the Plan”.</p>	<p><b><u>B0594</u></b></p>		<p>The Executive notes the issues raised in this comprehensive submission and notes that this was also raised in a submission received on the 2016 Plan.</p> <p>Ireland currently has two world Heritage Sites – Bur na Boine and Skellig Michael. The Department of Arts, Heritage and the Gaeltacht has National responsibility for compiling a Tentative List of properties for potential nomination and inscription on the World Heritage List. In January 2019, the Minister for Culture, Heritage and the Gaeltacht opened applications for Ireland's Tentative List of properties for potential future nomination to the World Heritage List 2020-2030. The National Monuments Service (NMS) of the Department oversees the process of Tentative List application and assessment, and this process is currently ongoing. When the last tentative list was put forward in 2010 the following sites were put forward for inclusion but were not ultimately chosen by UNESCO.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<ul style="list-style-type: none"> <li>• The Burren</li> <li>• Céide Fields and North West Mayo Boglands</li> <li>• The Monastic City of Clonmacnoise and its Cultural Landscape</li> <li>• Dublin - The Historic City of Dublin</li> <li>• Early Medieval Monastic Sites (Clonmacnoise, Durrow, Glendalough, Inis Cealtra, Kells and Monasterboice)</li> <li>• The Royal Sites of Ireland (Cashel, Dún Ailinne, Hill of Uisneach, Rathcroghan Complex and Tara Complex)</li> <li>• Western Stone Forts</li> </ul> <p>For a site to be nominated for World Heritage Site status it must be of outstanding universal value and meet one of ten rigorous criteria. As there is no World Heritage Site in the County, there is no requirement for a section in the Draft Plan regarding a feasibility study.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.11.2: Section 11.3 Archaeological Heritage</b>			
<b>3.11.2.1: Policy Objective HER1: Protection of Archaeological Heritage</b>			
<p>i) Submission proposes new replacement section for Section 11.3.1.1: Archaeological Heritage.</p>	<b>B0594</b>		<p>The Executive notes the issues raised in this comprehensive submission.</p> <p>It is considered that the wording of existing Draft Plan Section 11.3.1.1: Archaeological Heritage, in combination with all other Policies set out within Chapter 11: Heritage, already adequately captures – albeit in a condensed form – the subject matter of this submission.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.11.2.2: Section 11.3.2 Protection of Archaeological Heritage</b>			
<p>i) Submission proposes new replacement section for Section 11.3.1.2: Protection of Archaeological Material.</p> <p>The submission also suggested additional Policy Objectives within this section, derived from Kildare,</p>	<b>B0594</b> <b>B1247</b>		<p>The Executive notes the issues raised in this comprehensive submission.</p> <p>It is considered that the wording of existing Draft Plan Section 11.3.1.2: Protection of Archaeological Heritage, in combination with all other Policies set out within Chapter 11: Heritage, already adequately captures the subject matter of this submission. Chapter 11</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>South Dublin, Limerick, Laois and Meath (Draft) and other County Development Plans in relation to signage to publicly accessible archaeological sites and National Monuments listed in the RMP, Rights of way, protection of archaeological sites and features of historic interest discovered/identified subsequent to the publication of the RMP and management.</p> <p>Submission requests a standalone 'Archaeological Heritage' Chapter/section.</p>			<p>already contains a standalone section 11.3 entitled "Archaeological Heritage". It is not considered that a standalone Chapter is required.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.11.2.3: Policy Objective HER3: Protection of Historic Towns</b>			
<p>i) Welcome the continued inclusion of Dalkey and its special status as a Heritage Town in the Plan.</p> <p>Important to proceed with caution when permitting new development as there is a danger that excessive development could lead to the loss of the unique setting of Dalkey which has led to its designation as a Heritage Town.</p>	<b>B0890</b>	4	<p>The Executive notes the issues raised.</p> <p>In the Draft Plan, Dalkey is a designated Architectural Conservation Area and a zone of archaeological potential. There are a large number of Protected Structures in the area. The Heritage town designation stems from an earlier Bord Fáilte designation back in 1994. The Draft Plan contains a suite of policies aimed at protecting the character of the area and safeguarding against inappropriate development. These include HER8: Work to Protected Structures; HER13: Architectural Conservation Areas; HER14: Demolition within an ACA; section 12.11.2.3 Development within the Grounds of a Protected Structure; and section 12.11.4 New Development within an ACA.</p> <p>There are other policies within the Draft Plan such as Policy Objective PHP18: Residential Density which states <i>"In some circumstances higher residential density development may be constrained by Architectural Conservation Areas (ACA) and Candidate Architectural Conservation Areas (cACA) designations, Protected Structures and other heritage designations. To enhance and protect ACA's, cACA's, Heritage Sites, Record of Monuments and Places, Protected Structures and their settings, new residential development will be required to minimise any adverse effect in terms of height, scale, massing and proximity."</i></p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<b>3.11.2.4: Policy Objective HER4: Carrickmines Castle Site</b>			
i) Carrickmines castle is an important historic site and must be protected and maintained. A site plaque would be welcomed.	<b><u>B0122</u></b> <b><u>B0847</u></b>	9	The Executive notes the issue raised.  Policy Objective 11.3.2.2. HER4: Carrickmines Castle site states " <i>It is a Policy Objective to support the implementation of the (Archaeological) Conservation Plan for the Carrickmines Castle Site.</i> " The County Heritage Plan also includes an action to implement the Carrickmines Interpretation and Communications plans which include for signage.  <b>Recommendation</b> No change to Draft Plan.
<b>3.11.2.5: Policy Objective HER5: Historic Burial Grounds</b>			
i) Submission proposes new replacement policy wording for Section 11.3.2.3. Policy Objective HER5: Historic Burial Grounds.	<b><u>B0594</u></b>		The Executive notes the issues raised in this of this comprehensive submission.  It is considered that the wording of existing Draft Plan Section 11.3.2.3: Historic Burial Grounds, in combination with all other Policies set out within Chapter 11: Heritage, already adequately captures – albeit in a condensed form – the subject matter of this submission.  <b>Recommendation</b> No change to Draft Plan.
<b>3.11.3: Section 11.4 Architectural Heritage</b>			
<b>3.1.3.1: Policy Objective HER7 Record of Protected Structures</b>			
i) The submission welcomes the recognition of the importance of historical structures and landscapes and the clarification of what is a Protected Structure. The submission also welcomes the inclusion on the Record of Protected Structures of structures recommended by the NIAH for inclusion on the RPS.	<b><u>B0052</u></b>		The Executive welcomes the support provided.  <b>Recommendation</b> No change to Draft Plan.
<b>3.1.3.2: Policy Objective HER8: Work to Protected Structures</b>			
ii) Request that a curtilage of protected structures is marked as protected.	<b><u>B1096</u></b>		The Executive notes the issue raised.

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>It is not considered necessary to depict a curtilage for all Protected Structures in the County. Policy Objective HER8: Work to Protected Structures safeguards the character of Protected Structures and states: <i>"It is a Policy Objective to:</i></p> <p><i>i. Protect structures included on the RPS from any works that would negatively impact their special character and appearance.</i></p> <p><i>ii. Ensure that any development proposals to Protected Structures, their curtilage and setting shall have regard to the 'Architectural Heritage Protection Guidelines for Planning Authorities' published by the Department of the Arts, Heritage and the Gaeltacht. ..."</i></p> <p>Any proposal for development to, or within the curtilage of a Protected Structure, needs to adhere to this Policy Objective. Adherence with the Policy Objective will be assessed via the development management process.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) The Dundrum Central Mental Hospital site includes significant Protected Structures. To ensure that these are not compromised by proposed development, density and height needs to be sympathetic to the existing Victorian buildings and not overshadow them.</p>	<p><b>B1125</b></p>	<p>1</p>	<p>The Executive notes the issues.</p> <p>It is not considered appropriate to comment on an individual site. Notwithstanding, Policy Objective HER8: Work to Protected Structures safeguards the character of Protected Structures and states: <i>"It is a Policy Objective to:</i></p> <p><i>i. Protect structures included on the RPS from any works that would negatively impact their special character and appearance.</i></p> <p><i>ii. Ensure that any development proposals to Protected Structures, their curtilage and setting shall have regard to the 'Architectural Heritage Protection Guidelines for Planning Authorities' published by the Department of the Arts, Heritage and the Gaeltacht.</i></p> <p><i>iii. Ensure that all works are carried out under supervision of a qualified professional with specialised conservation expertise.</i></p> <p><i>iv. Ensure that any development, modification, alteration, or extension affecting a Protected Structure and/or its setting is sensitively sited and designed, and is appropriate in terms of the proposed scale, mass, height, density, layout, and materials.</i></p> <p><i>v. Ensure that the form and structural integrity of the Protected Structure is retained in any redevelopment and that the relationship between the Protected Structure and any complex of adjoining buildings, designed landscape features, or views and vistas from within the grounds of the structure are respected.</i></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><i>vi. Respect the special interest of the interior, including its plan form, hierarchy of spaces, architectural detail, fixtures and fittings and materials.</i></p> <p><i>vii. Ensure that new and adapted uses are compatible with the character and special interest of the Protected Structure.</i></p> <p><i>viii. Protect the curtilage of protected structures and to refuse planning permission for inappropriate development within the curtilage and attendant grounds that would adversely impact on the special character of the Protected Structure.</i></p> <p><i>ix. Protect and retain important elements of built heritage including historic gardens, stone walls, entrance gates and piers and any other associated curtilage features.</i></p> <p><i>x. Ensure historic landscapes and gardens associated with Protected Structures are protected from inappropriate development (consistent with NPO 17 of the NPF and RPO 9.30 of the RSES).</i></p> <p>Any proposal for development to, or within the curtilage of a Protected Structure, needs to adhere to this Policy Objective. Adherence with the Policy Objective will be assessed via the development management process and will take into account section 28 guidelines including those pertaining to building height. Section 12.11.2.3 Development within the Grounds of a Protected Structure is also of relevance.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.1.4: Section 11.4.2 Architectural Conservation Areas</b>			
<b>3.1.4.1: Policy Objective HER14: Demolition within an ACA</b>			
<p>i) Submission requests a more robust policy to protect the County’s historic fabric and compensatory energy solutions should be sought in the form of heat pumps, solar energy, and smart technology.</p>	<b>B1189</b>		<p>The Executive notes the issues raised.</p> <p>Policy Objective HER14 states “<i>it is a Policy Objective to prohibit the demolition of a structure(s) that positively contributes to the character of the ACA.</i>” This is considered sufficient to manage demolition of buildings of architectural and historical interest within ACA’s. The use of heat pumps, solar energy and smart technology are not precluded for use in historic buildings subject to proposals being sensitive to the elements that contribute to the character and appearance of the building.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>The Council will encourage the retention and deep retrofit of structurally sound, habitable dwellings in good condition as opposed to demolition and replacement and will also encourage the retention of existing houses that, while not Protected Structures or located within an ACA, do have their own merit and/or contribute beneficially to the area in terms of visual amenity, character or accommodation type - particularly those in areas consisting of exemplar 19th and 20th Century buildings and estates. For example, Policy objective CA6: Retrofit and Reuse of Buildings states:</p> <p><i>“It is a Policy Objective to support the retrofitting and reuse of existing buildings rather than their demolition and reconstruction where possible recognising the embodied energy in existing buildings and thereby reducing the overall embodied energy in construction as set out in the Urban Design Manual (Department of Environment Heritage and Local Government, 2009). (Consistent with RPO 7.40 and 7.41 of the RSES).”</i></p> <p>Furthermore, Policy Objective PHP19: Existing Housing Stock – Adaptation states <i>“It is a Policy Objective to Conserve and improve existing housing stock through supporting improvements and adaption of homes consistent with NPO 34 of the NPF.”</i></p> <p>These policies are considered robust to protect the County’s historic fabric.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission considers that there is a threat to the Sandycove ACA due to car parking issues in area, unsightly overhead wires, poor street lighting, lack of public toilet facilities, lack of bins and poor signage which needs to be standardised.</p>	<p><b>B0949</b></p>	<p>3 4</p>	<p>The Executive notes the issues raised.</p> <p>Policy Objective HER16: Public Realm and Public Utility works within an ACA and HER15: Shopfronts within an ACA are designed to manage the issues raised. Furthermore, Section 12.6.8 provides guidance in relation to shopfronts, signage, advertising and public art.</p> <p><b>The provision of public toilets, lack of bins and poor signage are not County Development Plan issues.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<b>3.1.5: Section 11.4.3 Protection of Other Elements of Built Heritage</b>			
<b>3.1.5.1: Policy Objective HER24: Protection of Coastline Heritage</b>			
i) Policy should take note of the cultural, social and historical heritage of skiff rowing, specific only to the East coast.	<b><u>B1017</u></b>		<p>The Executive notes the issue raised. The Draft County Heritage Plan includes an action to celebrate maritime heritage and includes sport in its definition of cultural heritage.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
ii) Bullock Pier mentioned as a Protected Structure, however, an understanding of the historic, natural and industrial heritage of Bullock Harbour would be beneficial for developers to have a context for their proposals.	<b><u>B0426</u></b>	4	<p>The Executive notes the issues raised. Any future development for Bullock Harbour will be assessed having regard to policies and objectives contained within the County Development Plan and will be subject to the normal planning process.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
iii) Request that the newly restored EIRE site at Hawkcliffe be recognised for its historic value and that appropriate measures are taken for its continued maintenance.	<b><u>B0890</u></b>	4	<p>The Executive notes the issue raised.</p> <p>The Eire site at Hawkcliffe is Council-owned land and the maintenance of the site is the responsibility of the Council. The Draft County Heritage Plan includes an action to: <i>“update and expand DLR’s Historic Landscape Character mapping, identifying the visible and connected remnants of the past in contemporary urban, per-urban and rural landscapes.”</i> The restoration of the sign was undertaken as a project by Dalkey Tidy Towns group, and an information sign regarding the site has been installed at the entrance path from road.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
iv) Submission request that the Council investigate restoration and or purchase by the Council of Pucks Castle, Cromlech on Pucks Castle Lane/Murphys lane, St Kevin’s Church Ballyman Road/valley.	<b><u>B0869</u></b>	10 14	<p>The Executive notes the issue raised. It is an action in the Draft County Heritage Plan to support heritage activity in the County including providing advice support and funding available to private owners of heritage sites. <b>The purchase of historic structures is not a County Development Plan issue.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
v) Submission request that the harbour management plan prepared by Shaffrey assoc. be added to the Draft Plan as an Appendix	<b>B1249</b>		<p>The Executive notes the issue raised.</p> <p>The Harbour Management Plan 2011 was commissioned by the Dún Laoghaire Harbour Company to provide guidance on the protection of the cultural heritage of Dún Laoghaire harbour, in the context of the preparation of the Dún Laoghaire Harbour Masterplan.</p> <p>The Draft Plan contains a Specific Local Objective 39 which states:  <i>"In accordance with National Policy, the Council shall, within the relevant planning frameworks, formulate and implement, where appropriate and applicable, a plan for the future development of Dún Laoghaire Harbour and its curtilage."</i></p> <p>It is noted that the Harbour Management Plan is referenced in the Draft County Heritage Plan <i>"Identify suitable ways and locations across the County to celebrate DLR as an enduring place of arrival and departure, including the significant maritime and transport heritage of Dún Laoghaire Harbour in line with the Dún Laoghaire Harbour Heritage Management Plan, other DLR harbours and the broader context of the Dublin Bay UNESCO Biosphere"</i>.</p> <p>Regard will be had to the Plan when preparing the LAP.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.11.6: Section 11.5 Countywide Heritage</b>			
<b>3.11.6.1: Policy Objective HER25: Heritage Plan</b>			
i) Submission request that the Heritage Plan is updated to support the County Development Plan's heritage objectives and to achieve stated government policy as set out in the National Heritage Plan 2002.	<b>B0929</b>		<p>The Executive notes the issue raised. The new Draft County Heritage Plan is currently being finalised.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
ii) Submission consider that there is scope for a Heritage Centre at Bullock Harbour.	<b>B0426</b>	4	<p>The Executive notes the submission raised. The Draft County Heritage Plan includes an action to <i>"identify suitable ways and locations across the County to celebrate DLR as an enduring place of arrival and departure, including the significant maritime and transport heritage of Dún Laoghaire Harbour in line with the Dún Laoghaire Harbour Heritage Management Plan, other DLR harbours and the broader context of the Dublin Bay UNESCO Biosphere"</i>.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p><b>Recommendation</b> No change to Draft Plan.</p>
iii) Submission request that intangible heritage be referenced and included in the Draft Plan.	<b>B0503</b>		<p>The Executive notes the submission raised. The Draft County Heritage Plan states that <i>“Cultural heritage includes tangible (physical) heritage.....as well as intangible heritage such as music, language, craft and sport”</i></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
iv) Request that the Plan make it mandatory for all new developments to use only traditional granite cladding in keeping with the area if incorporating stone finishes.	<b>B0503</b>	9	<p>The Executive notes the issue raised.</p> <p>Whilst the use of granite is encouraged in some area of the County it is not considered that this should be a mandatory requirement. The Kiltiernan Glenamuck LAP already recognises that the local area is characterised by natural stone especially granite. It states that <i>“An important element of the local character is employment of granite in construction. The use of local granite should be encouraged in future development, to continue the tradition of utilising local materials and to maximise the visual and economic linkages with the local landscape”</i></p> <p>The Built Form Objectives as outlined on page 32 of the Local Area Plan, include Objective BF04 <i>“To encourage the incorporation of granite and granite features into the design of residential and commercial buildings -continuing the tradition of utilising local materials and maximising the visual and economic linkages with the local landscape”.</i></p> <p><b>Recommendation</b> No change to Draft Plan</p>
v) Request that the council considers as part of the Heritage Plan the following: <ul style="list-style-type: none"> <li>• Maintenance of and access to historic and cultural sites on private land,</li> <li>• If access is not possible, request that the council consider erecting signage or make looped walking tours.</li> </ul>	<b>B1163</b>	8 9 10	<p>The Executive notes the issue raised.</p> <p>It is an action in the Draft County Heritage Plan to support heritage activity in the County including providing advice on support and funding available to private owners of heritage sites.</p> <p>There is a balance to be struck between increasing access to key heritage sites and their protection to ensure that this finite resource is not compromised. Policy Objective HER1: Protection of Archaeological Heritage states that <i>“It is a Policy Objective to protect archaeological sites, National Monuments (and their settings), which have been identified in</i></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><i>the Record of Monuments and Places and, where feasible, appropriate and applicable to promote access to and signposting of such sites and monuments”.</i></p> <p>The Draft County Heritage Plan expands on how Policy Objective HER1 will be applied, relevant related actions in the Draft County Heritage Plan include <i>“develop an interpretation framework to guide where and how we tell the County’s stories and to steer DLRcc and community-led projects. The emphasis will be on digital, creative, guided approaches, podcasts, temporary and permanent outdoor trails, enhancing existing interpretation, celebrating key viewpoints and improving the setting and access to heritage features through place-making and orientation”, “map and develop projects on the historic paths we tread; mass routes, military routes, designed avenues, sheep walks and pedestrian links through the urban fabric, to the coast and into the mountains” and also to “expand the number of participatory initiatives in DLR to build active involvement with heritage “e.g. adopt a monument, adopt a path, “friends of” schemes etc.”</i></p> <p><b>Recommendation</b> No change to Draft Plan.</p> <p>See also section 3.26 Appendix 12 Rights of Way</p>
<p>vi) Various submissions raise general and specific issues relating to protection of and access to heritage sites including the following:</p> <ul style="list-style-type: none"> <li>• Druid’s Altar</li> <li>• Old Rathmichael Church</li> <li>• Historic places in Kiltiernan</li> <li>• Ballybrack, Kiltiernan and Brennanstown Dolmen.</li> </ul>	<p><b><u>B0122</u></b> <b><u>B0549</u></b> <b><u>B0587</u></b> <b><u>B0733</u></b> <b><u>B0737</u></b> <b><u>B0740</u></b> <b><u>B0761</u></b> <b><u>B0952</u></b> <b><u>B1005</u></b> <b><u>B1056</u></b></p>	<p>7 9 10</p>	<p>The Executive notes the issue raised.</p> <p>There is a balance to be struck between increasing access to key heritage sites and their protection to ensure that this finite resource is not compromised. Policy Objective HER1: Protection of Archaeological Heritage states that <i>“It is a Policy Objective to protect archaeological sites, National Monuments (and their settings), which have been identified in the Record of Monuments and Places and, where feasible, appropriate and applicable to promote access to and signposting of such sites and monuments”.</i></p> <p>A right-of-way described as <i>“Bishops Lane to Druids Altar via Kiltiernan Abbey”</i> was included in the County Development Plan 2004-2010. Further to appeals to the Circuit Court the Druids Altar right-of-way was subsequently deleted from the 2004-2010 County Development Plan.</p> <p>See also section 3.26 Appendix 12 Rights of Way</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>The Draft County Heritage Plan expands on how the Policy Objective HER1 will be applied, relevant related actions in the County Heritage Plan include <i>“develop an interpretation framework to guide where and how we tell the County's stories and to steer DLRcc and community-led projects. The emphasis will be on digital, creative, guided approaches, podcasts, temporary and permanent outdoor trails, enhancing existing interpretation, celebrating key viewpoints and improving the setting and access to heritage features through place-making and orientation”, “map and develop projects on the historic paths we tread; mass routes, military routes, designed avenues, sheep walks and pedestrian links through the urban fabric, to the coast and into the mountains” and also to “expand the number of participatory initiatives in DLR to build active involvement with heritage “e.g. adopt a monument, adopt a path, “friends of” schemes etc.”</i></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.11.6.2: Policy Objective HER26: Historic Demesnes and Gardens</b>			
<p>i) HER26: Historic Demesnes and Gardens: Ensure that Marley House and Fernhill House are protected under this objective.</p>	<u>B0942</u>	N/A	<p>The Executive notes the issue raised. Marley House and Fernhill House are Protected Structures and as such are listed in Appendix 4 of the Draft Plan. As Protected Structures they are also afforded protection under Policy Objectives HER8: Work to Protected Structures and HER10: Protected Structures and Building Regulations.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<b>3.11.6.3: Policy Objective HER27: Civic Memorials</b>			
<p>i) HER27: Civic Memorials: Due consideration needs to be given to including statues of women in the County.</p> <p>A plaque should be erected at St Nessans in Sandyford Village in honour of the life of Máire Comerford, who was a lifelong republican, and spent much of her life at the house.</p>	<u>B0942</u> <u>B0079</u>	5	<p>The Executive notes the issues raised.</p> <p>It is recognised that Civic Memorials offer opportunities for the Council to celebrate, honour or remember a person, group of persons or event of significance. The provision of Civic Memorials is dealt with by the Memorials Committee in line with the DLR Memorials Policy and submissions can be made to the Committee c/o the DLR Heritage Officer. <b>This is not a County Development Plan issue.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<b>3.11.7: Miscellaneous Heritage and Conservation</b>			
<p>i) Submission requests that the Council 'Pilot' a Conservation Area Regeneration Scheme (CARS) in partnership with the Heritage Council.</p> <p>Pilot' a Heritage Action Zone (HAZ) in Dún Laoghaire in partnership with the Department of Housing, Heritage Council and other stakeholders.</p>	<b><u>B0929</u></b>		<p>The Executive notes the issues raised.</p> <p>Conservation Area Regeneration Scheme (CARS) are grants to support heritage-led regeneration in Conservation Area in Scotland. It is noted that the Scottish scheme is currently being reviewed so as to facilitate stronger community ownership and increase impact and sustainability. As the parent scheme is under review and as allocation of resources is more appropriate for schemes that have funding and national standing it is not recommended that the Council engage in a pilot scheme of this nature.</p> <p>The concept of a Heritage Action zone is based on the UK government-funded High Streets Heritage Action Zone programme, which is being delivered by Historic England. As allocation of resources is more appropriate for schemes that have funding and national standing it is not recommended that the Council engage in a pilot scheme of this nature.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission requests that the impact of climate change on current heritage and future development in the County is assessed and considers that any assessment should include opportunities for green-ecosystem services.</p>	<b><u>B0929</u></b>		<p>The Executive notes the issue raised.</p> <p>The Draft County Heritage Plan includes an action area titled "<i>New Ways of Living</i>" which includes actions to; "<i>carry out climate change risk assessments for archaeological and architectural heritage under DLR management to establish a baseline of heritage sites at risk and to inform a strategic basis for maintenance, stabilization and decision making</i>", collaboration on implementation of the County Biodiversity Plan and the nature-based solutions section of the DLR Climate Change Action Plan, availing of CARO's Climate Action Knowledge hub and inclusion of creative/design practitioners in heritage projects to support positive culture change, collaboration on events for Dublin Climate Action Week, and new heritage initiatives based on local and sustainable food production and foraging and traditional uses of local trees and plants.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submission requests:</p>	<b><u>B1075</u></b>		<p>The Executive notes the issue raised.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<ul style="list-style-type: none"> <li>Allocation of resources to the preservation of monuments and sites and access to same,</li> <li>a strategy to raise awareness of local heritage sites, preservation of forestry heritage and coastal heritage.</li> </ul>			<p>The Draft County Heritage Plan includes a series of actions under the overarching aim of <i>“protected and accessible historic sites, buildings and monuments”</i>, and a broad range of actions to raise awareness of local heritage including natural heritage.</p> <p>Policy Objective HER24 includes for protection of coastal heritage. <i>“It is a Policy Objective to:</i></p> <ol style="list-style-type: none"> <li><i>i. Encourage and promote the retention of features of the County’s coastal heritage where these contribute to the character of the area.</i></li> <li><i>ii. Have regard to those items identified in the Coastal Architecture Heritage Survey when assessing any development proposals”</i></li> </ol> <p><b>Recommendation</b> No change to Draft Plan.</p>

### 3.12: Chapter 12- Development Management

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<b>3.12.1: General</b>			
i) Submissions requests that: <ul style="list-style-type: none"> <li>• The Planning Authority reconsider overly prescriptive DM standards as they are considered to be contrary to National Guidance and could impact on delivery of homes in the County.</li> <li>• Development management standards should allow flexibility.</li> </ul>	<u><b>B0999</b></u> <u><b>B1120</b></u> <u><b>B1145</b></u>		<p>The Executive notes the issues raised.</p> <p>Unless otherwise stated, recommended residential and other development standards included in this Chapter are informed by a series of Section 28 Guideline documents. These guideline documents are also detailed in Appendix 13 of the Draft Plan and Appendix 14 sets out how the Planning Authority have implemented the relevant policies and objectives of the Minister contained in all relevant Section 28 Guidelines and compliance with SPPRs contained therein. It is noted that the OPR, which is the body with the statutory task of evaluation and assessment of development plans in their submission commends the Council for <i>“the inclusion of a comprehensive statement of compliance with section 28 guidelines to inform the Draft Plan”</i>. It is considered that the detailed Policy Objectives and more detailed development management criteria set out in the Draft Plan provide clarity for applicants and third parties.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
ii) The submission expresses support with respect to the following Sections of this Chapter: <ul style="list-style-type: none"> <li>• 12.2 Climate Action.</li> <li>• 12.2.3 Wind Energy – first paragraph.</li> <li>• 12.7 Green Infrastructure and Biodiversity.</li> <li>• 12.7.1 Green Infrastructure.</li> <li>• 12.7.2 Biodiversity.</li> <li>• 12.7.3 Sensitive Landscapes and Site Features.</li> <li>• 12.7.4 Amenity Landscapes, Views and Prospects.</li> <li>• 12.9 Environmental Infrastructure.</li> </ul>	<u><b>B0594</b></u>		<p>The Executive welcomes the support provided in this detailed submission.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<b>3.12.2: Section 12.2: Climate Action</b>			
<b>3.12.2.1: Section 12.2.4 Solar</b>			
<p>i) With respect to Section 12.2.4 Solar the submission suggests that an additional provision be included with respect to 'Hydro Power', as follows:</p> <p><i>In assessing hydro energy schemes proposals, the Council will take into account the impact on public rights of way and walking routes.</i></p>	<b>B0594</b>		<p>The Executive notes the issues raised.</p> <p>As Section 12.2.4 specifically relates to planning applications for solar energy farms the proposed addition is not supported. Hydro energy schemes would fall under general renewable energy policy which is positive towards renewables.</p> <p>Section 12.2.2 Renewable Energy of the Draft Plan states, <i>"For all other development, the Planning Authority will assess planning applications for renewable energy developments on a case-by-case basis with regard to requirements set out below. They will be considered in the context of current Government policy on the subject but will take into account other, often competing, Council policies on land usage relating to sectors such as agriculture, tourism and outdoor recreational activities, the protection of the scenic areas of the County, sensitive ecological sites, and any relevant guidelines issued from time-to-time by the Department of Housing, Local Government and Heritage"</i>, which would take into account the impact of any such proposals on public rights of way and walking routes.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.12.2.2: Section 12.2.5 District Heating</b>			
<p>i) Submission requests that the Central Mental Hospital site is specifically mentioned with regard to district heating in Section 12.2.5.</p>	<b>B0529</b>		<p>The Executive notes the issues raised.</p> <p>Section 12.2.5. District Heating of the Draft Plan states, <i>"Pending the issuing of a National Policy Framework for District Heating, the Planning Authority, will support and encourage larger scale developments to consider future proofing to facilitate the future development of potential district heating and waste heat recovery and utilisation"</i>.</p> <p>In this regard, it is not considered reasonable to identify specific sites with respect to district heating.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<b>3.12.3: Section 12.3: Neighbourhood, People, Homes and Places</b>			
<b>3.12.3.1: Section 12.3.2.1 Design Criteria</b>			
<p>i) Submission considers that a permeability and accessibility review is required within 'Sustainable Neighbourhood Infrastructure', under Section 12.3.2.1 and Section 12.3.2.2 of the Draft Plan, in that permeability should be demonstrated both within and through the lands especially related to access to active travel and public transport stops.</p>	<b>B0192</b>		<p>The Executive notes the issues raised. Section 12.3.2.1 Development within Sustainable Neighbourhood Infrastructure Lands of the Draft Plan states that, proposals of this nature, <i>"Should incorporate measures to improve public use of the site and/or facilities as appropriate and seek to improve permeability through and linkages to adjoining lands"</i>.</p> <p>It is acknowledged that the 'public use' of the site is not specific in terms of within the site and related to active travel and public transport.</p> <p><b>Recommendation</b> Amend Section 12.3.2.1, bullet point 3 (p. 228) from: <i>"Should incorporate measures to improve public use of the site and/or facilities as appropriate and seek to improve permeability through and linkages to adjoining lands"</i>.</p> <p>To:  <i>"Should incorporate measures to improve public use of the site and/or facilities as appropriate and seek to improve permeability <u>and accessibility both within and through the site and linkages to adjoining lands especially related to access to active travel and public transport stops</u>"</i>.</p>
<p>ii) Submission requests insistence on good architectural design for apartments with adequate space and parking provision (in Kiltiernan LAP area).</p>	<b>B0985</b>	9	<p>The Executive notes the issues raised.</p> <p>Section 12.3.5 Apartment Development of the Draft Plan provides guidance with respect to apartment design. Section 12.4.5 relates to Car Parking provisions and Section 12.8 for Open Space Requirements pertaining to apartment developments.</p> <p>Section 4.4.1 of the Draft Plan 'Quality Design and Place Making', also includes a number of Policy Objectives which cover design aspects. These Policy Objectives will be utilised in the assessment of individual planning applications, including those in the Kiltiernan area.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>iii) Submission requests Design Criteria Accessibility focus on active travel for all ages and abilities.</p>	<b>B0406</b>		<p>The Executive notes the issues raised.</p> <p>Section 12.4.1 Traffic Management and Road Safety of the Draft Plan states, <i>“On existing roads, traffic management measures may be required to create a pedestrian and cycle friendly environment. Road safety interventions may also be required to create a safe road environment for all road users such as the <u>provision of accessible pedestrian facilities and segregated cycle tracks</u>. To ensure that the needs of all road’s users are considered, a Quality Audit may be required for major developments that impact on the road network and for all new road and traffic schemes. This should be carried out in accordance with DMURS and best UK practice”....</i></p> <p><i>“Potential applicants for planning permission should engage in pre-planning discussions to ascertain which audits, if any, should be submitted with the application. Further details on the guidance on the audit thresholds can be found within the ‘Development Management Thresholds Information Document’ in Appendix 3.</i></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.12.3.2: Section 12.3.2.1 Development within Sustainable Neighbourhood Infrastructure Lands</b>			
<p>i) Submissions raised the following issues:</p> <ul style="list-style-type: none"> <li>• With regard to site adjoining Beacon Hospital:</li> <li>• The provision of 20% of useable open space be dependent on specific site proposals and existing site conditions.</li> </ul> <p>The requirement of 20 % useable open space is not appropriate for this infill brownfield site instead an amount of public amenities should be required with an equivalent area of 20 % with a minimum of 10 % open space would be more appropriate.</p>	<b>B0978</b> <b>B1011</b>		<p>The Executive notes the issues raised.</p> <p>With regard to the provision of 20% useable open space on SNI lands, Section 12.3.2.1 ‘Development within Sustainable Neighbourhood Infrastructure Lands’ states: <i>“This may not apply where an existing facility is located within a more urban, mixed use setting, as identified by SLO 10 and SLO 22”.</i></p> <p>It is noted that there may be more urban sites that have the land use zoning objective applied rather than SLO 10 or 22. In this regard, it is considered that the wording of Section 12.3.2.1 should be amended to take account of this.</p> <p><b>Recommendation</b> <i>Amend Section 12.3.2.1, bullet point 2 (p. 228) from: “Shall maintain the recreational value of the site by retaining a minimum of 20% usable open space in development proposals. This may not apply where an existing facility is located within a more urban, mixed use setting, as identified by SLO 10 and SLO 22.”</i></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>To:</p> <p><i>“Shall maintain the recreational value of the site by retaining a minimum of 20% usable open space in development proposals. <del>This A derogation may not apply where an existing facility is located within an more urban, mixed use setting. Such facilities will typically be as identified by SLO 10 and SLO 22.</del></i></p>
<p>ii) Submission requests that Arts and Culture infrastructure should be considered as part of social and sustainability audits carried out by perspective developers to ensure sufficiency of social infrastructure.</p>	<p><b>B1095</b></p>		<p>The Executive notes the issue raised.</p> <p>Section 12.3.4.4 Phased Development of the Draft Plan states that, “No large developments over 100 residential units shall be permitted unless it can be demonstrated that adequate provisions for specified physical and social infrastructural requirements, including: roads, sewers, water mains, community, recreational and sporting facilities (indoor and outdoor), public transport, first and second level schools and shops are available at completion to support development”.</p> <p>It is also noted that Policy Objective PHP5: Community Facilities states: “The Council will, during the lifetime of this Plan complete a Community Audit. This Audit will contain a Countywide review of existing facilities and indicate where gaps, if any exist.”</p> <p>A study was carried out in Dundrum i.e. the Dundrum Community, Cultural and Civic Action Plan to “report on the current community, civic and cultural context for Dundrum and environs, identify key needs, requirements and opportunities to support on-going community development over the next 20 years” .</p> <p>An objective of the CCCAP is to “make recommendations on the potential allocation of sites for community, cultural and civic uses as well as qualify and quantify facilities which may be required up to 2040”.</p> <p>While this is a non-statutory document it does identify a shortfall in the Dundrum area and it is envisaged that the community audit referenced in the Plan will carry out a similar process throughout the County, during the lifetime of the Plan.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
No change to Draft Plan.			
<b>3.12.3.3: Section 12.3.2.4 Childcare Facilities</b>			
<p>i) Submissions raises issues in relation to childcare provision and section 12.3.2.4 as follows:</p> <p>Recommends to <i>omit the second and third paragraphs of section 12.3.2.4, and replacement with a policy requiring that applications for development comprising childcare facilities should present proposals for the timing of delivery of the childcare facility relative to the delivery of housing or</i> Revise paragraph 3 of section 12.3.2.4 to require that childcare facilities be completed prior to occupation of more than 100 dwellings.”</p> <p>Childcare provision should be factored into all planning applications for larger developments.</p>	<p><b><u>B0011</u></b> <b><u>B0873</u></b></p>		<p>The Executive note the issues raised and agrees with the sentiments.</p> <p>The Draft Plan promotes the provision of additional childcare facilities in tandem with new residential developments and encourages the improvement/expansion of existing childcare facilities across the County.</p> <p>Policy Objective PHP6: Childcare Facilities (p.72) states: “It is a Policy Objective to:</p> <ul style="list-style-type: none"> <li>• <i>Encourage the provision of appropriate childcare facilities as an integral part of proposals for new residential developments and to improve/expand existing childcare facilities across the County. In general, at least one childcare facility should be provided for all new residential developments subject to demographic and geographic needs.</i></li> <li>• <i>Encourage the provision of childcare facilities in a sustainable manner to encourage local economic development and to assist in addressing disadvantage.”</i></li> </ul> <p>With regard to new, larger residential developments, PHP6 states that “<i>In general, where a new residential development is proposed – with 75+ dwellings (or as otherwise required by the Planning Authority) – one childcare facility shall be provided on site in accordance with Sections 2.4, 3.3.1 and Appendix 2 of the ‘Childcare Facilities Guidelines for Planning Authorities’ (2001).”</i></p> <p>Section 12.3.2.4 Childcare Facilities (p.229) sets out the development management requirements for the provision of childcare facilities, including those childcare facilities, should be constructed in tandem with the overall scheme, and that an operator for the facility should be secured at an early stage.</p> <p>Section 12.3.2.4 also states: “<i>To combat the ongoing childcare crisis and make childcare more accessible to everybody in the County, childcare facilities in a new development must be completed prior to residents moving in.</i>” In theory, this requirement would ensure that facilities are ready to serve the residents of a new development, however, in practice this may create difficulties if a childcare facility is in the later phases of development of a scheme or</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>may have an undesired effect of opening an unviable facility. New residential communities, can take some time for young families to establish and there may not be the critical mass of local children to sustain a new childcare facility if it were ‘forced’ to open too soon.</p> <p>The requirement to construct a facility and secure an operator in tandem with a new development is sufficient to ensure that a childcare facility is available to serve new residents.</p> <p>Regard is also had to Section 4.7 of the Design Standards for New Apartments Guidelines for Planning Authorities, (2018), which states:  <i>“Notwithstanding the Planning Guidelines for Childcare Facilities (2001), in respect of which a review is to be progressed, and which recommend the provision of one child-care facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision of any such facilities in apartment schemes should be established having regard to the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile of the area. One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms”.</i></p> <p>It is considered, therefore, that Section 4.7. of the Guidelines should be referenced in Section 12.3.2.4 for clarity.</p> <p><b>Recommendation</b>  Amend Section 12.3.2.4 Childcare Facilities (p. 229) from:</p> <p><i>“Where it is proposed to provide a new childcare facility as part of a new residential or commercial development, the facility shall be constructed in tandem with the overall scheme. The developer shall seek to secure an operator of the facility at an early stage and submit details of the intended operation of the facility relative to the completion and occupation of dwellings / commercial buildings.</i></p> <p><i>To combat the ongoing childcare crisis and make childcare more accessible to everybody in the County, childcare facilities in a new development must be completed prior to residents moving in.”</i></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>To:</p> <p><i>Where it is proposed <u>or required</u> to provide a new childcare facility as part of a new residential or commercial development, the facility shall be constructed in tandem with the overall scheme. <u>To address the need for childcare and make childcare more accessible to everybody in the County, the developer shall seek to secure an operator and open the facility at an early stage preferably prior to the occupation of the residential units. In this regard, the developer shall <del>and</del> submit phasing details for the development and include details of the intended operation of the facility relative to the completion and occupation of dwellings / commercial buildings.</u></i></p> <p><i><del>To combat the ongoing childcare crisis and make childcare more accessible to everybody in the County, childcare facilities in a new development must be completed prior to residents moving in.”</del></i></p> <p>And also:</p> <p>Include an additional bullet point at the end of the following subsection “In assessing individual planning applications for childcare facilities, the Planning Authority will have regard to the following:” on p. 230, as follows:</p> <p><i><u>“In considering applications for new Childcare Facilities the Planning Authority will refer to Section 4.7 of the Design Standards for New Apartments Guidelines for Planning Authorities, (2018), specifically the provision of one child-care facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, as detailed in Section 4.7, with the exception for one-bedroom or studio type units, which should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms”.</u></i></p>
<b>3.12.3.4: Section 12.3.2.5 School Development</b>			
i) Submission seeks clarification with regard to Section 12.3.2.5 ‘School Development’ in terms of the “Full	<b>B1012</b>		The Executive notes the issue raised.

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p><i>details of all anticipated uses outside of school hours should be provided with the application", as to,</i></p> <p>(a) whether or not it is envisaged that these 'uses' would be regulated by any grant of permission issued for the development and,</p> <p>(b) what approach would be adopted by the Council if the school, at a later stage, wished to accommodate an 'unanticipated use'.</p>			<p>Specific details required to be submitted as part of any school development would be determined on a case-by-case basis through the development management process. Any conditions deemed necessary to control a proposed additional usage of school facilities would be assessed as part of a planning decision either by the local Planning Authority or by An Bord Pleanála on appeal. Further permission may be required in the event that an alternative use is sought.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission states that new schools should be designed as traffic free zones without drop off points except for children with disabilities.</p>	<b>B1205</b>		<p>The Executive notes the issues raised.</p> <p>Modal change or a move from the car to other sustainable forms of transport is promoted in Section 5.4 'Promoting Modal Change' in the Draft Plan. The use of more sustainable modes of travel will be promoted in the development of new schools, however, travel by car to new schools would currently still need to be facilitated, particularly so with regard to drop-off and collection points.</p> <p>School development is guided by Section 12.3.2.5 'School Development' in the Draft Plan. Section 12.3.2.5 requires all school development to provide a school travel plan – this may set out proposals for reduced, or indeed, traffic free school development.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.12.4: Section 12.3.3. Quantitative Standards for All Residential Development</b>			
<b>3.12.4.1: Section 12.3.3.1 Residential size and mix (see also Section 3.17, Appendix 2, Interim Housing Strategy and HNDA)</b>			
<p>i) Submission considers that it is unclear in Section 12.3.3.1 <i>Residential Size and Mix</i>, whether these requirements place an onus on developers to deliver the housing types referenced (housing for older people, people with disabilities, adaptability, multigenerational living).</p>	<b>B0271</b>		<p>The Executive notes the issue raised.</p> <p>At present neither legislation and/or Section 28 Guidelines allow the Planning Authority to require a developer to provide a minimum proportion of homes for the elderly. The Building Regulations, which are a separate code to the planning code, do place requirements in relation to accessibility (under Part M).</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>Chapter 12 should propose a requirement to have a stated minimum proportion of homes that meet these needs, reflecting the proportion of older people and people with disabilities in the population.</p>			<p>The Draft Plan does, however, following on from the evidence base HNDA contained in Appendix 2, allow the Planning Authority to apply mix requirements and by providing for a minimum 3 or 4 bed plus units in apartments schemes it is considered that differing household types are being catered for. Forthcoming Government policy may provide the ability to address this issue.</p> <p>The Plan caters for all typologies (i.e older people, people with disabilities, adaptability, multigenerational living) as referenced in Section 12.3.3.1 of the Draft Plan states:  <i>“In order to demonstrate compliance with Policy Objective PHP26 and based on the findings of the Draft Housing Strategy and Interim HNDA, planning applications received for 50+ residential units either individually or cumulatively with lands located within the neighbourhood (10-minute walk) will be required to incorporate a variety and choice of housing units by type and size so as to meet the differing household need in the County”... “The proposed provision of residential units (both houses and apartments), shall provide a mix that reflects existing, and emerging household formation, housing demand patterns and housing demand patterns and trends identified locally and/ or within the County. New residential communities (as set out in the Core Strategy and Figure 2.9 of the Core Strategy Map) shall ensure an appropriate mix including a proportion of larger units” .</i></p> <p><b>Recommendation</b>                      No change to Draft Plan.</p>
<p>ii) Numerous submissions question content and validity of Interim HNDA and request omission of Housing Mix Table contained in Chapter 12.</p>	<p><b><u>B0581</u></b>  <b><u>B0596</u></b>  <b><u>B0801</u></b>  <b><u>B0805</u></b>  <b><u>B0811</u></b>  <b><u>B0823</u></b>  <b><u>B0831</u></b>  <b><u>B0836</u></b>  <b><u>B0843</u></b>  <b><u>B0848</u></b>  <b><u>B0887</u></b>  <b><u>B0889</u></b></p>		<p>The Executive notes the issue raised.</p> <p><b>Recommendation</b>                      See detailed response and recommendation in Appendix 2 Housing Strategy and Interim HNDA.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
	<p><b><u>B0891</u></b>  <b><u>B0960</u></b>  <b><u>B0981</u></b></p>		
<p>iii) Various submissions raise issues relating to residential development including mix and type as follows:</p> <ul style="list-style-type: none"> <li>• There is a need for residential schemes to reflect the shift towards remote/home working through the provision of larger apartments, larger balconies, more communal areas, and the provision of housing with rear gardens.</li> <li>• Any new housing development should include replacement of trees and green spaces.</li> <li>• All housing complexes should be permeable and fence free.</li> <li>• Request a high-speed planning system for people wanting to divide semi-detached homes into apartments.</li> <li>• Existing 3 bed apartments are unsuitable for families. Need well sized 3 and 4 bed apartments with dual aspect and proper sound-proofing that a family can stay in as children get older.</li> <li>• Requests that housing development contains 10% single storey units.</li> </ul>	<p><b><u>B0043</u></b>  <b><u>B0334</u></b>  <b><u>B0724</u></b>  <b><u>B0780</u></b>  <b><u>B0840</u></b></p>		<p>The Executive notes the issue raised.</p> <p>As set out in other responses in this report the issue of mix is specifically addressed in the Plan with new requirements in relation to the provision of larger apartments to cater for families and for smaller households who may require larger home to facilitate home working.</p> <p>The provision of a separate fast track planning approval system for people wanting to divide semi-detached homes into apartments is beyond the remit of the planning authority. Replacement planting is a consideration when dealing with planning applications. The Executive would not concur that all development should be fence free as there is a need to differentiate between various types of open space to allow people have a safe and private space.</p> <p>To provide for 10% single storey units would not accord with National policy However, the Council does recognize that a mix of typologies is crucial for creating sustainable neighbourhoods and single storey units can be desirable for certain cohort of the community such as the elderly and/or disabled. The provision of such units does have to be balanced with the achievement of compact growth. Policy in the Draft Plan supports a mix of housing typologies and within the County there are already some schemes permitted on the edge of the built-up area, which have included a mix of apartments, 3 storey and single storey units.</p> <p>In relation to apartment units, it is noted that Section 3.7 of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, which references the 2 bed, 3 person unit, states,  <i>“While providing necessary variation in dwelling size, it would not be desirable that, if more generally permissible, this type of two-bedroom unit would displace the current two-bedroom four-person apartment. Therefore, no more than 10% of the total number of units in any private residential development may comprise this category of two-bedroom three-person apartment. This is to allow for potential social housing provision further to Part V of the Planning and Development Act, 2000, (as amended), or, if this type of unit is not required to</i></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><i>meet social housing requirements, that it would allow for an acceptable level of variation in housing type”.</i></p> <p>It is considered that Section 3.7. of the Guidelines should be referenced in Section 12.3.3.1 to ensure that an acceptable level of variation in housing type is also provided.</p> <p><b>Recommendation</b>  <i>Amend Section 12.3.3. Residential Size and Mix (p.232) by including an additional bullet point at the end of the following subsection “A statement outlining how the scheme has been designed for the needs of older people/ or persons with a disability and or lifetime homes.”, as follows:</i></p> <p><i>“No more than 10% of the total number of units in any private residential development may comprise of two-bedroom three-person apartment types”.</i></p>
<b>3.12.5: Section 12.3.4 Residential Development – General Requirements</b>			
<b>3.12.5.1: Section 12.3.4.2 Habitable Rooms</b>			
<p>i) Submissions request:</p> <p>Second paragraph of section 12.3.4.2 be simply revised to omit the specified requirement for the extent of glazing (20%). The revised paragraph would state as follows: <i>“All habitable rooms within new residential units shall have access to appropriate levels of natural / daylight and ventilation. In this regard, development shall be guided by the principles of Site Layout Planning for Daylight and Sunlight, A guide to good practice (Building Research Establishment Report, 2011) and/or any updated guidance. A daylight analysis will be required for all proposed developments of 50+ units. The impact of any development on existing habitable rooms should also be considered.”</i></p>	<p><b>B0873</b> <b>B1206</b></p>		<p>The Executive notes the issues raised and consider that the requirement that the extent of glazing be should not be less than 20% of the floor area of any habitable room goes beyond the requirement of the BRE guidance on daylight and sunlight, would be difficult to assess and consider that it should be omitted.</p> <p><b>Recommendation</b>  Amend Section 12.3.4.2 Habitable Rooms (p.235) as follows:</p> <p>From:  <i>“All habitable rooms within new residential units shall have access to appropriate levels of natural /daylight and ventilation. In this regard, and in order to maximise available light, glazing to all habitable rooms should not be less than 20% of the floor area of any habitable room. Development shall be guided by the principles of Site Layout Planning for Daylight and Sunlight, A guide to good practice (Building Research Establishment Report, 2011) and/or any updated guidance. A daylight analysis will be required for all proposed developments of 50+ units. The impact of any development on existing habitable rooms should also be considered”.</i></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
There is no simple rule of thumb for daylight in a room because orientation and context play such a big role.			<p>To:</p> <p><i>"All habitable rooms within new residential units shall have access to appropriate levels of natural /daylight and ventilation. <del>In this regard, and in order to maximise available light, glazing to all habitable rooms should not be less than 20% of the floor area of any habitable room.</del> Development shall be guided by the principles of Site Layout Planning for Daylight and Sunlight, A guide to good practice (Building Research Establishment Report, 2011) and/or any updated, or subsequent guidance, in this regard. A daylight analysis will be required for all proposed developments of 50+ units, or as otherwise required by the Planning Authority. The impact of any development on existing habitable rooms should also be considered"</i>.</p>
<b>3.12.5.2: Section 12.3.4.3 Naming of Residential Estates</b>			
i) Submission states that Dún Laoghaire-Rathdown County Council needs to pay more attention to names.	<b>B1206</b>		<p>The Executive notes the issue raised.</p> <p>Section 12.3.4.3 of the Draft Plan, 'Naming of Residential Estates, states that <i>"Dún Laoghaire-Rathdown place names are an important part of the County's cultural heritage and reflect local history from ancient times to the present. It is a Policy Objective, therefore, that the naming of streets and residential estates shall reflect local place names or local people of note, heritage, language, or topographical features as appropriate, and shall incorporate old place names from the locality as much as possible. Bi-lingual and Irish-language signs will be mandatory. The applicant/developer should ensure that the chosen place name for a new residential development is appropriate relative to its location and is not already in use within the County"</i>.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.12.6: Section 12.3.5 Apartment Development</b>			
i) Various submission either express support or opposition to apartment living as follows: <ul style="list-style-type: none"> <li>Apartment living is not conducive to the Irish way of life.</li> <li>Building of apartments should not be promoted.</li> </ul>	<b>B0754</b> <b>B1167</b>		<p>The Executive notes the issues raised and welcomes the support provided. It is acknowledged in the Draft Plan that apartment living already plays a key role and will continue to do so in the future in terms of provision of homes in the County.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> <li>• Apartments promote transient living, are badly designed, and constitute a subtle social divide that is growing in Ireland.</li> <li>• Apartments will become more prevalent in Irish Cities.</li> </ul>			
<b>3.12.6.1: Section 12.3.5.1 Dual Aspect in Apartments</b>			
<p>i) Various submissions raise issues in relation to dual aspect as follows:</p> <ul style="list-style-type: none"> <li>• Designation of the County as an “intermediate location” conflicts with SPPR 4 of the Design Standards for New Apartments.</li> <li>• Requests the omission of commentary in the Draft County Development Plan that DLR is a County ‘classified as a suburban or intermediate location’.</li> <li>• Considers that DLR falls into central and/or Accessible Urban Locations and Intermediate Locations.</li> <li>• Accordingly, the plan should allow a minimum of 33% of dual aspect units in more central and accessible urban locations.</li> <li>• Assessment of location should be on a case-by-case basis.</li> </ul>	<p><b><u>B0581</u></b>  <b><u>B0801</u></b>  <b><u>B0805</u></b>  <b><u>B0811</u></b>  <b><u>B0823</u></b>  <b><u>B0831</u></b>  <b><u>B0836</u></b>  <b><u>B0843</u></b>  <b><u>B0848</u></b>  <b><u>B0887</u></b>  <b><u>B0889</u></b>  <b><u>B0891</u></b>  <b><u>B0960</u></b>  <b><u>B0981</u></b>  <b><u>B0999</u></b>  <b><u>B1043</u></b>  <b><u>B1072</u></b>  <b><u>B1120</u></b>  <b><u>B1145</u></b></p>		<p>The Executive notes the issues raised but does not agree with the content.</p> <p>Section 3.17 of the Section 28 Apartment Guidelines states that <i>“it is a policy requirement that apartment schemes deliver at least 33% of the units as dual aspect in more central and accessible and some intermediate locations, i.e. on sites near to city or town centres, close to high quality public transport or in SDZ areas, or where it is necessary to ensure good street frontage and subject to high quality design. Where there is a greater freedom in design terms, such as in larger apartment developments on greenfield or standalone brownfield regeneration sites where requirements like street frontage are less onerous, it is an objective that there shall be a minimum of 50% dual aspect apartments. Ideally, any 3-bedroom apartments should be dual aspect.”</i></p> <p>SPPR 4 requires that:  <i>“A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate.</i>  <i>(ii) In suburban or intermediate locations, it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.</i>  <i>(iii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects”</i></p> <p>The characteristics of the County, which for the most part is very different to those of the city centre, mean that most brownfield and greenfield apartment schemes should have no issue achieving the 50% requirement. The Draft Plan includes the caveat contained in SPPR 4 in relation to smaller infill sites and refurbishments.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>It is considered that Section 12.3.5.1 is fully consistent with SPPR 4.</p> <p>It is also noted that the OPR and have raised no issue in this regard.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.12.6.2: Section 12.3.5.2 Separation Between Blocks</b>			
<p>i) Submissions request that:</p> <ul style="list-style-type: none"> <li>Requirement for separation between blocks should be omitted as the apartment guidelines state that separation distances that may be specific in development plans should be replaced by performance criteria.</li> <li>A case-by-case approach advocated.</li> </ul>	<p><b>B0801</b> <b>B0960</b> <b>B0999</b> <b>B1206</b></p>		<p>The Executive notes the issues raised.</p> <p>Section 12.3.4, Residential Development – General Requirements, provides guidance with respect to the requirements relating to all housing developments including both housing and apartment developments which are consistent with National and Regional objectives set out in the NPF and RSES, and has regard to the Section 28 ‘Urban Development and Building Height Guidelines’ and is consistent with the 4 Strategic Planning Policy Requirements contained within.</p> <p>With respect to separation distances Section 12.3.5.2 of the Draft Plan states that <i>“All proposals for residential development, particularly apartment developments and those over three storeys high, shall provide for acceptable separation distances between blocks to avoid negative effects such as excessive overlooking, overbearing and overshadowing effects and provide sustainable residential amenity conditions and open spaces”</i>.</p> <p>While reference is made to a minimum clearance of circa 22 metres, this is a general guide to ensure that residential amenity is protected. In any event this will be assessed on a case-by-case basis. The Draft Plan also states that <i>“In certain instances, depending on orientation and location in built-up areas, reduced separation distances may be acceptable”</i>.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.12.6.3: Section 12.3.5.3 Internal Storage and External Storage</b>			
<p>i) Submission requests that greater storage facilities such as a basement lock-up facility should be a condition of planning.</p>	<p><b>B1079</b></p>		<p>The Executive notes the issue raised.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>Section 12.3.5.3 Internal Storage and External Storage of the Draft Plan provides details with respect to the minimum requires for both internal and external storage. it also states that, <i>“Apartment schemes should provide external storage for bulky items outside individual units (i.e. at ground or basement level), in addition to the minimum apartment storage requirements. These storage units should be secure, at ground floor level, in close proximity to the entrance to the apartment block and allocated to each individual apartment unit”</i>.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission states that apartments lack storage and laundry facilities.</p>	<p><b>B0754</b></p>		<p>The Executive notes the issues raised.</p> <p>Section 12.3.5.3 ‘Internal Storage and External Storage’, and Table 12.3 ‘Minimum Storage Requirements’ of the Draft Plan provides guidance on the standards for apartment developments which are in accordance with the Design Standards for New Apartments, Guidelines for Planning Authorities, 2018.</p> <p>This section also states that <i>“Apartment schemes should provide external storage for bulky items outside individual units (i.e. at ground or basement level), in addition to the minimum apartment storage requirements. These storage units should be secure, at ground floor level, in close proximity to the entrance to the apartment block and allocated to each individual apartment unit”</i>.</p> <p>While arrangements regarding laundry facilities are a matter for individual management companies overseeing multi-unit developments. Regard is had to the Design Standards for New Apartments, Guidelines for Planning Authorities, 2018 Private Space requirements Section 3.3.7 states that, <i>“It is preferable that balconies would be primarily accessed from living rooms, although larger apartments may include wrap around and/or secondary balconies, which should also include a screened clothes-drying space”</i>. The following Section of the Guidelines, Communal Space Section 4.5 also states, <i>“Communal rooms may be provided in apartment schemes, particularly in some larger developments. For example, communal laundry facilities and for drying clothes may be provided in well-ventilated areas”</i>.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<b>3.12.7: Section 12.3.6 Built-to-Rent Accommodation (See also Chapter 13, Appendix 2)</b>			
<p>i) Submissions consider that restrictions on built to rent are not appropriate and considers that the requirement for B2R to meet section 12.3.6 of the Draft Plan conflicts with SPPR 8 in respect of 50% requirement in relation to dual aspect, separation distances and storage.</p> <p>Submissions also request that section 12.3.5 be amended to remove restrictions on Built to rent.</p>	<p><b><u>B0581</u></b>  <b><u>B0801</u></b>  <b><u>B0823</u></b>  <b><u>B0836</u></b>  <b><u>B0848</u></b>  <b><u>B0887</u></b>  <b><u>B0889</u></b>  <b><u>B0960</u></b>  <b><u>B0981</u></b></p>		<p>The Executive notes the issues raised.</p> <p>Section 12.3.6 “Build-to-Rent Accommodation” of the Draft Plan references compliance with ‘Design Standards for New Apartments Guidelines for Planning Authorities’ (2018).</p> <p>It is also noted that Policy Objective PHP27: ‘Build to Rent and Shared Accommodation’ was drafted having regard to the ‘Design Standards for New Apartments Guidelines for Planning Authorities’ (2018) and reference to same is contained within the wording of the Policy Objective.</p> <p>Build-to-Rent (BTR) plays a role in creating sustainable communities as it offers a longer-term rental option for residents. The Draft Plan sets out suitable locations for BTR and applies specific development management criteria, all of which are in accordance with the Apartment Guidelines.</p> <p>Section 12.3.6 ‘Build-to-Rent Accommodation’ of the Draft Plan aligns with the requirements of SPPR7 and SPPR8 in the Apartment Guidelines. It is noted that SPPR 8 (i) states “<i>No restrictions on dwelling mix and all other requirements of these Guidelines shall apply, unless specified otherwise</i>”.</p> <p>SPPR 8 allows for:</p> <ul style="list-style-type: none"> <li>• Flexibility in storage and private amenity space “at the discretion of the planning authority.” Section 12.3.6 provides for this subject to certain criteria.</li> <li>• Reduced car parking on the basis of location. Car parking standards are dealt with under Section 12.4.5 of the Draft Plan and take account of location.</li> <li>• BTR development not being required to apply the 10% increase floor areas or comply with 12 units per floor per core.</li> </ul> <p>All other parts of the Apartment Guidelines apply to BTR developments. These requirements are set out within Section 12.3.5 ‘Apartment Development’ in the Draft Plan. For clarity, in</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>order to ensure that the 10% increase in floor area and 12 units per core are not inadvertently applied to BTR development, a caveat will be applied to these requirements in Section 12.3.5.</p> <p>The Draft Plan does not apply any mix requirement to BTR development, however, for the avoidance of doubt a note to this affect will be applied to Section 12.3.3.1 ‘Residential Size and Mix’ in the Draft Plan.</p> <p><b>Recommendation</b>                      Amend Section 12.3.3.1 ‘Residential Mix’ (p.232) by adding the following sentence to the end of the section:  <i>“For the avoidance of doubt, in accordance with legislation this section will not apply to BTR only developments.”</i></p> <p>Amend Section 12.3.5.5 ‘Minimum Apartment Floor Areas’ (p.237) to add a footnote to “by a minimum of 10%” as follows:  <i>“*Not applicable to BTR development in accordance with SPPR 8.”</i></p> <p>Amend Section 12.3.5.6 ‘Additional Apartment Design Requirements’ (p.237) to add a footnote to “12 apartments per floor per core” as follows:  <i>“*Not applicable to BTR development in accordance with SPPR 8.”</i></p>
<p>ii) Various submission state that the requirement for on-site car parking for ‘Build to Rent’ is contrary to SPPR8 of the Apartment Guidelines.</p>	<p><b><u>B0801</u></b>  <b><u>B0887</u></b>  <b><u>B0891</u></b>  <b><u>B0981</u></b></p>		<p>The Executive notes the issued raised.</p> <p>Section 12.3.6 of the Draft Plan states that “All proposed BTR accommodation must comply with SPPR 7 and SPPR 8 as set out within the Design Standards for New Apartments, 2018 (and any amending SPPR as appropriate). In this regard applications for proposed BTR must clearly demonstrate compliance with the guidelines”.</p> <p>SPPR 8 states that “There shall be a default of minimal or significantly reduced car parking provision on the basis of BTR development being more suitable for central locations and/or proximity to public transport services”.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>With respect to car parking the Draft Plan states <i>“On-site car parking must comply with the requirements set out in Section 12.4.5. In all instances, the applicant shall clearly demonstrate that the BTR development is located within a 10-minute walking time from high frequency public transport routes. Where any derogations in standards including standards relating to open space, car parking and storage are availed of, a condition should be attached to any grant of permission to state that planning permission must be sought for a change of tenure to another tenure model following the period specified in the covenant”</i>.</p> <p>In line with the parking standards set out in the Draft Plan where Build to Rent schemes are in locations in close proximity to public transport services, they can put forward an argument for minimal or reduced car parking provision.</p> <p>The guidance in the Draft Plan is not considered to be contrary to SPPR8.</p> <p>It is also noted that the OPR and have raised no issue in this regard.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.12.8: Section 12.3.8 Additional Accommodation in Existing Built-up Areas</b>			
<b>3.12.8.1: Section 12.3.8.1 Extensions to dwellings</b>			
<p>i) Submission considers that Section 12.3.8.1 of the Draft Plan is too restrictive including the statement that ‘a significant break in the building line should be resisted unless the design can demonstrate to the Planning Authority that the proposal will not impact on the visual or residential amenities of directly adjoining dwellings’ which it is considered is impossible to achieve.</p>	<b>B1206</b>		<p>The Executive notes the issued raised but does not concur.</p> <p>Section 12.3.8.1 Extensions to Dwellings of the Draft Plan specifically subsection (i) Extensions to the Front, is a new addition to the Draft Plan and provides guidance with respect to porch extension and front extensions at both ground and first floor level.</p> <p>It is not considered that the guidance provided is too restrictive or misses the opportunity as it states the following: <i>“A break in the front building line will be acceptable, over two floors to the front elevation, subject to scale and design, however a significant break in the building line should be resisted unless the design can demonstrate to the Planning Authority that the proposal will not impact on the visual or residential amenities of directly adjoining dwellings”</i>.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>Again, this is assessed on a case-by-case basis.</p> <p>With respect to traffic safety, this Section of the Draft Plan also states that, "A <i>minimum driveway length of 6 metres should be maintained</i>". This may also have implications for design and scale of the propose front extension.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission considers that Section 12.3.8.1 of the Draft Plan in relation to 'Alterations at Roof/Attic Level', is too prescriptive and ignores the potential variety and character that varying roof lines and building heights could bring to create a street identity and sense of place</p>	<b>B1206</b>		<p>The Executive notes the issued raised but does not concur.</p> <p>Section 12.3.8.1 Extensions to Dwellings of the Draft Plan specifically subsection (iv) 'Alterations at Roof/Attic Level', provides guidance with respect to alterations at roof level. Variation in roof lines and building heights will be assessed on a case-by-case basis which allows for variety and character to be put forward in any design proposal, and will be subject to the following criteria:</p> <ul style="list-style-type: none"> <li>• <i>"Careful consideration and special regard to the character and size of the structure, its position in the streetscape and proximity to adjacent structures.</i></li> <li>• <i>Existing roof variations on the streetscape.</i></li> <li>• <i>Distance/contrast/visibility of proposed roof end.</i></li> <li>• <i>Harmony with the rest of the structure, adjacent structures, and prominence".</i></li> </ul> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.12.8.2: Section 12.3.8.5 Corner/Side Garden Sites</b>			
<p>i) Submission is critical of some units granted and welcomes others. Considers that many houses are mundane and detract from the character of areas and should not be permitted.</p>	<b>B1206</b>		<p>The Executive notes the issues raised.</p> <p>The Council recognises the principles of sustainable growth embodied in the NPF and RSES, and the need to secure more compact urban development patterns with specific targets for the delivery of new homes by way of corner side garden and infill development within existing urban areas. The Draft Plan provides the policy framework through which these objectives can be achieved and incorporates a range of robust planning policies with respect to Corner/Side Garden site development, as per Section 12.3.8.5.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><i>“Size, design, layout, relationship with existing dwelling and immediately adjacent properties”</i>, is a fundamental consideration when assessing planning applications for corner/side garden sites. Alternative design proposals are opens to consideration and will be assessed on a case-by-case basis.</p> <p>Regard is also had to Section 12.3.8.7 Infill of the Draft Plan, which states <i>“In accordance with Policy Objective PHP19: Existing Housing Stock – Adaptation, infill development will be encouraged within the County. New infill development shall respect the height and massing of existing residential units. Infill development shall retain the physical character of the area including features such as boundary walls, pillars, gates/ gateways, trees, landscaping, and fencing or railings. This shall particularly apply to those areas that exemplify Victorian era to early-mid 20th century suburban ‘Garden City’ planned settings and estates that do not otherwise benefit from ACA status or similar”</i>.</p> <p>The submission is critical of a permitted house which is photographed in the Draft Plan on page 241. Whilst the submitters preference for more contemporary architecture is welcome and supported the Executive considers that the criticism is overly harsh.</p> <p>Note: Submission states 12.3.8.5: Sub-division of dwellings but it is actually 12.3.8.5 Corner/Side Garden sites, and reference in the example is of a corner garden site.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.12.8.3: Section 12.3.8.8 0/0 Zone</b>			
<p>i) Submission considers that Section 12.3.8.8 of the Draft Plan, ‘0/0 Zone’, should be omitted as it is the antithesis of sustainable development and would exclude vast areas that are well served by public transport.</p>	<b><u>B1206</u></b>		<p>The Executive notes the issue raised. See detailed response and recommendation set out in Section 2.1 of this report.</p> <p><b>Recommendation</b> <i>See response and recommendation in Section 2.1 above.</i></p>
<b>3.12.8.4: Section 12.3.8.10 Mews Lane Development</b>			
<p>i) Submission considers that Montpelier Lane, Monkstown, which is in private ownership does not meet the following criteria of Section 12.8.3.10 of</p>	<b><u>B1137</u></b>	2 3	<p>The Executive notes the issues raised but would not concur. The County Development Plan maps identify ‘Other Objectives’, which pertain to certain sites in the County, in this case “Mews Development Acceptable in Principle”. Mews Lanes, in private ownership or otherwise</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>the Draft Plan, and therefore the designation should be removed from Map as follows:</p> <ul style="list-style-type: none"> <li>• <i>“Is already adequately serviced and surfaced from the site to the public road, with a suitable underlying base to cater for the expected traffic volumes.</i></li> <li>• <i>Has a legally acceptable agreement between owners or interested parties who intend to bring the laneway to standards and conditions - particularly in terms of services, road surfacing and public lighting - suitable to be taken-in charge by the Council.</i></li> <li>• <i>Where the Council is likely to be able to provide services and where owners can be levied to allow the Council to service the sites”.</i></li> </ul>			<p>are identified. Section 12.3.8.10 states that <i>“The principle of mews development will generally be acceptable when located on a lane that”</i> meets certain criteria. The word generally is important as each location does not have to necessarily meet all criteria. Each application has to be assessed on its own merits. To remove the objective from the lane is considered unwarranted and could stymie much needed sustainable infill development.</p> <p>This Section also notes that:  <i>“Each proposed mews lane unit will be assessed having regard to site specific conditions. Reduced standards from the above may be acceptable, particularly in cases of conversion of existing two storey structures in sound condition and of particular architectural and/or townscape value”.</i></p> <p>Following a site inspection, it is noted that the laneway to the rear of Montpelier Parade has been developed with several mews’ dwellings of varying vintage, scale, and design. These were assessed under the current 2016 Plan and previous County Development Plans, and therefore the principle of mews lane is well established at this location.</p> <p><b>Recommendation</b>                      No change to Draft Plan.</p>
<p>ii) With regard to Mews Lane Development, the submission requests that design criteria to guide remaking or infilling of mews sites, lane access layouts, amenity and boundary wall conservation, is provided, particularly in lanes that are not immediate to the historic town or village centres. This should take heritage and biodiversity into consideration and a review of the taking in charge policy for mews lanes is required.</p>	<p><b><u>B1014</u></b></p>		<p>The Executive notes the issue raised. The guidance requested in relation to mews lane developments is a too detailed level for a County Development Plan. Any proposal with heritage and biodiversity implications will be assessed accordingly.</p> <p>With respect to taking in charge for mews lane development, Section 12.3.8.10 states that the principle of mews development will generally be acceptable when the site:</p> <ul style="list-style-type: none"> <li>• <i>“Is already adequately serviced and surfaced from the site to the public road, with a suitable underlying base to cater for the expected traffic volumes”.</i></li> <li>• <i>“Has a legally acceptable agreement between owners or interested parties who intend to bring the laneway to standards and conditions - particularly in terms of services, road surfacing and public lighting - suitable to be taken-in-charge by the Council. The onus will be on the applicant(s) to demonstrate that they have a</i></li> <li>• <i>consensus of owners or interested parties”.</i></li> <li>• <i>“Where the Council is likely to be able to provide services and where owners can be levied to allow the Council to service the sites”.</i></li> </ul>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>Notwithstanding the above, regard shall also be had to the requirements set down in the Council’s ‘Development Works in Residential and Industrial Areas’ - Guidance Document, the Council’s ‘Taking in Charge Policy Document’.</p> <p>Section 12.3.4.5 Management Companies and Taking in Charge of the Draft Plan also provides guidance with respect to taking in charge specifically <i>“In this regard, the applicant shall have regard to the Department of the Environment, Community and Local Governments document ‘Taking in Charge of Residential Developments Circular Letter PD 1/08’, and ‘Circular Letter PL 5/2014’, and the Council’s ‘Development Works Guidance Document’”</i>.</p> <p>It is noted that the Council’s ‘Taking in Charge Policy Document’, was updated in 2016 and in addition the Department produced the ‘National Taking in Charge Initiative Report’, in 2018. Therefore, this should be updated and should also include a note with respect to any successor guidance.</p> <p>Section 12.4.1 Traffic Management and Road Safety of the Draft Plan also references the Council’s taking in charge document.</p> <p><b>Recommendation</b>  <i>Amend Section 12.3.4.1 Road and Footpath Requirements (p.234), first paragraph from: “The requirements set down in the Council’s ‘Development Works in Residential and Industrial Areas’ - Guidance Document, the Council’s ‘Taking in Charge Policy Document’, (2011 – updated 2013) and ‘The Design Manual for Urban Roads and Streets’, (DMURS), 2019, will generally apply.”</i></p> <p>To:</p> <p><i>The requirements set down in the Council’s ‘Development Works in Residential and Industrial Areas’—Guidance Document, the Council’s ‘Taking in Charge Policy Document’, (2011—updated 2013) and ‘The Design Manual for Urban Roads and Streets’, (DMURS), 2019, will generally apply.</i></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>Amend Section 12.3.4.5 Management Companies and Taking in Charge (p. 235) last paragraph from:</p> <p><i>“In this regard, the applicant shall have regard to the Department of the Environment, Community and Local Governments document ‘Taking in Charge of Residential Developments Circular Letter PD 1/08’, and ‘Circular Letter PL 5/2014’, and the Council’s ‘Development Works Guidance Document’”.</i></p> <p>To:</p> <p><i>“In this regard, the applicant shall have regard to the Department of the Environment, Community and Local Governments document ‘Taking in Charge of Residential Developments Circular Letter PD 1/08’, and ‘Circular Letter PL 5/2014’, <u>the Departments ‘National Taking in Charge Initiative Report’, 2018,</u> and the Council’s ‘Taking in Charge Policy Document’, ‘Development Works Guidance Document’, <u>and any successor guidance with respect to taking-in-charge”.</u></i></p> <p>Amend Section 12.4.1 Traffic Management and Road Safety (p. 252) last sentence of first paragraph from:</p> <p><i>“All work carried out on the public roadway shall meet the requirements of the Council’s ‘Taking in Charge Policy for Residential Developments Guidance Document’ April 2016 and ‘Development Works Guidance Document’.</i></p> <p>To:</p> <p><i>“All works carried out <del>on the public roadway</del> shall meet the requirements of the Council’s ‘Taking in Charge Policy Document,’ ‘<del>Taking in Charge Policy for Residential Developments Guidance Document</del>’ April 2016 and ‘Development Works Guidance Document’, <u>and any successor guidance with respect to taking-in-charge”.</u></i></p>
<b>3.12.8.5: Section 12.3.8.11 Institutional Lands</b>			
<p>i) With respect to Institutional Lands the submission notes, where land in institutional use is currently being used for sporting or recreational use there should be a general presumption included in the Development Plan against the development of these lands except in exceptional circumstances.</p>	<p><b>B1012</b></p>		<p>The Executive notes the issue raised.</p> <p>Section 12.3.8.11 ‘Institutional Lands’ of the Draft Plan states that <i>“Where no demand for an alternative institutional use is evident or foreseen, the Council may permit alternative uses subject to the area’s zoning objectives and the open character of the lands being retained”.</i></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>The INST objective is to protect and provide for institutional use on open lands. The new SNI land use zoning objective has replaced many INST objectives with only a handful remaining on sites which are not considered to be SNI uses. Policy objective PHP 21 set out parameters in relation to development on sites subject to the INST objective. Given that the objective is to protect the INST use and open character of the lands it is not considered that there is a reasonable planning rationale to have a general presumption development on lands subject to the INST objective where they are being used for sporting or recreational use. The use of the lands relates to the INST use and alternative uses may be allowed where there is no demand for an alternative institutional use and subject to the open character and <i>recreational</i> value of the lands if any being retained.</p> <p>It is not considered that there is a reasonable planning rationale to have a general presumption against development on INST sites except in exceptional circumstances on lands subject to the INST objective where they are being used for sporting or recreational use. Rather Policy objective PHP 21 and section 12.3.8.11 provide clear guidance on parameters for consideration of development on such lands and that includes retaining their recreational value.</p> <p>Such a policy could prevent an Institutional use expanding. Third parties including sport clubs and organisations can make a submission on any planning application to redevelop a site subject to the INST objective.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.12.9: Section 12.4 Transport</b>			
<b>3.12.9.1: Section 12.4.1 Traffic Management and Road Safety</b>			
<p>i) Request that the:</p> <ul style="list-style-type: none"> <li>Plan recognise that any restrictions on the times of deliveries/collections to/from An Post facilities could have a serious impact on the ability of An Post to meet postal needs</li> </ul>	<b><u>B0950</u></b>		<p>The Executive notes the issues raised. <b>This is a design issue rather than a County Development Plan issue.</b> The accommodation of deliveries and customers are considered as part of the design process.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> <li>Request DLRCC to engage with An Post should any future area plan propose to amend delivery hours in town/city centre locations.</li> <li>Request that during the preparation of any future public realm and movement strategies, DLRCC recognise that a sufficient level of vehicular access is maintained</li> </ul>			
<p>ii) The submission requests that the Council Provide for adequate road widths as part of any planning development.</p>	<b><u>B0117</u></b>		<p>The Executive notes the issue raised.</p> <p>All roads have to be designed in accordance with Design Manual for Urban Roads and Streets. <b>This is a national design requirement and is not a County Development Plan issue.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Compliance with the TII's Light Rail Environment – Technical Guidelines for Development PE-PDV-00001 December2020.doc should be referred to where development is proposed within or in the vicinity of Luas lines in Section 12.4 and 12.9.4 Construction Management Plans.</p>	<b><u>B0192</u></b>		<p>The Executive agrees with the issue raised.</p> <p><b>Recommendation</b> Amend by including the following Section at the end of Section 12.4.14 (p.265) <b>“Development in the Vicinity of the Luas Line:</b> <i>Development in the vicinity of the Luas needs to appropriately take the light rail infrastructure into consideration. In this regard development should be guided by the TII's 'Light Rail Environment – Technical Guidelines for Development PE-PDV-00001', December 2020 and any subsequent updates of same”.</i></p> <p>Amend by adding the following text to Section 12.9.4 Construction Management Plans (p. 290) after the second paragraph: <i>“Construction in the vicinity of the Luas needs to appropriately take the light rail infrastructure into consideration. In this regard construction management should be guided by the TII's 'Light Rail Environment – Technical Guidelines for Development PE-PDV-00001', December 2020 and any subsequent updates of same”.</i></p>
<p>iv) Requests priority lights for pedestrians and cyclists at all traffic-light junctions.</p>	<b><u>B0406</u></b>		<p>The Executive notes the issues raised. <b>This is an operational traffic issue and not a County Development Plan issue.</b></p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
No change to Draft Plan.			
<b>3.12.9.2: Section 12.4.3: Travel Plans</b>			
<p>i) Requests that measures for cycling, walking and cycle parking are made mandatory.</p> <p>Business Districts need to be linked by segregated, connected cycle and walkways with sufficient covered bike parking at each work hub. Showers, dry rooms should be supplied by employers.</p>	<b><u>B0406</u></b>		<p>The Executive notes the sentiments of the issues raised.</p> <p>Travel Plans are prepared to support sustainable movement.</p> <p>Policy Objective T16: Travel Plans sets out that <i>“Travel Plans should seek to reduce reliance on car based travel and encourage more sustainable modes of transport over the life time of the development”</i>.</p> <p>Cycle parking is required for developments in accordance with Section 12.4.6 of the Draft Plan and the Council's 'Standards for Cycle Parking and Associated Cycle Facilities for New Developments'.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.12.9.3: Section 12.4.5 Car Parking Standards</b>			
<p>i) With regard to residential car parking standards:</p> <ul style="list-style-type: none"> <li>• Not enough is done to promote modal shift to more sustainable modes.</li> <li>• Request that the parking zones are reviewed and that the parking standards are indicated as maximum for residential development.</li> <li>• Request Planning Authority to reconsider minimum car parking standard for apartments of 1 space per unit.</li> <li>• Residential Parking needs to be revised and reworded to recognise the trends towards apartment development with significantly lower and, in some cases, “car-free” apartment scheme which should be open for consideration based on the criteria based outlined in the Draft Plan.</li> </ul>	<p><b><u>B0780</u></b> <b><u>B0805</u></b> <b><u>B0811</u></b> <b><u>B0831</u></b> <b><u>B0836</u></b> <b><u>B0848</u></b> <b><u>B0889</u></b> <b><u>B0960</u></b> <b><u>B0960</u></b> <b><u>B0999</u></b> <b><u>B1043</u></b> <b><u>B1072</u></b> <b><u>B1205</u></b></p>		<p>The Executive notes the sentiments of the issues raised but does not agree.</p> <p>The Draft Plan includes a new Policy Objective for carparking standards on page 109, Policy Objective T18 Car Parking Standards.</p> <p>The comprehensive car parking standards are set out in Section 12.4.5 (from p.253-260) and include Table 12.6 Car parking Zones and Standards and a Supplementary Map of Parking Zones, which should be examined in conjunction with the written statement. Section 12.4.6 sets out standards on cycle parking along with the standalone <i>'Standards for Cycle Parking and Associated Cycling Facilities for New Developments'</i>, 2018.</p> <p>Many of the submissions referring to residential car parking read as if they are considering Table 12.6 Car Parking Zones and Standards in isolation from the detailed guidance set out in the preceding pages of the Draft Plan. Reading and applying Table 12.6 in isolation does not give a full understanding of the nuances of the standards and the permitted deviations.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<ul style="list-style-type: none"> <li>Substantial areas of the County can be classified as ‘Central / Accessible’ locations, aligning most closely with Parking Zone 2 in Map T2 and therefore the car parking requirement for Zone 2 should be a maximum of 1 space per unit and allow for a reduced provision to be considered consistent with the recommendations of the Guidelines.</li> <li>In the context of the apartment guidelines the Draft Plan provides for excessive parking for apartment development.</li> <li>Plan does not allow sites that may meet the criteria of central/accessible urban locations to provide less than 1 car parking space per residential unit.</li> <li>Provision of blanket parking zones has the potential to result in rigid application for car parking standards and will not support a transition to a low carbon society.</li> <li>Request reconsideration of the concept of car parking zones so as to reflect national policy context.</li> </ul>			<p>The car parking standards in the Draft Plan have been drafted to take account of a wide range of objectives including Smarter Travel, the National Planning Framework, the ‘Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities’ (2018), along with changing commuting patterns and investments and the increasing availability of non-car modes as set out in Section 12.4.5 of the Draft Plan.</p> <p>The Draft Plan recognises “...the need to encourage non car modes by limiting car parking supply, especially at employment and retail destinations and at educational facilities, while at the same time prioritising high standards for cycle parking and requiring appropriate ancillary facilities for cyclists and pedestrians at destination points” (p.254).</p> <p>Section 12.4.5.1 of the Draft Plan states, “The propensity of people to choose non car modes is to a great extent determined by proximity to quality public transport as well as the range and accessibility, on foot or by bicycle, of services within an area. The County has therefore been divided into four Parking zones, reflecting the varying degrees to which these criteria are generally met”.</p> <p>As set out in Section 12.4.5.1 of the Draft Plan, car ownership levels are high in the County and:  <i>“There is a key distinction between residential parking and destination parking and there is less value in adopting more restrictive residential parking standards for the purposes of encouraging sustainable travel. Notwithstanding this, the proximity of residential developments, within parking zone 1 in particular, to both public transport and services, together with the need to strengthen the sustainability and resilience of our urban centres and make efficient use of land, will see an increasing shift towards densification of development around transport nodes and significant service centres with car travel and car ownership becoming less relevant. Within zone 1, car parking for residential developments has therefore been set as a maximum.”</i></p> <ul style="list-style-type: none"> <li>The standards are not blanket standard, and the iterative map allows for iterative updates as new permeability connections are achieved during the lifetime of the Plan.</li> <li>The residential parking standards have been set as norms for the parking zones 2,3 and 4.</li> </ul>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<ul style="list-style-type: none"> <li>The policy has a number of inbuilt flexibilities and has potential for deviations for both the zones and also the parking standards.</li> <li>Section 12.4.5.(i) sets out where deviations are permitted. Section 12.4.5.(i) states that <i>“In certain instances, in zones 1 and 2 the Planning Authority may allow a deviation from the maximum or standard number of car parking spaces specified in Table 12.6 or may consider that no parking spaces are required. Small infill residential schemes (up to 0.25 hectares) or brownfield/refurbishment residential schemes in zones 1 and 2 along with some locations in zone 3 (in neighbourhood or district centres) may be likely to fulfil these criteria.”</i></li> <li>The Draft in accordance with the Apartment Guidelines recognises that lower car parking or no carparking may be permissible in certain instances. Section 12.4.5.(i) sets out in 13 bullet points the situation where deviations are permitted from both the parking maximums and norms. These include <i>inter alia</i> best practise to encourage modal shift such as car sharing, permeability improvements etc. It is anticipated that this will encourage residential development to be designed to encourage this modal shift.</li> </ul> <p>Having regard to all the above, it is not considered that the amendments as requested are warranted.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) The submission requests that the Council insist that adequate on-street parking be provided.</p>	<p><b><u>B0117</u></b></p>		<p>The Executive notes the issue raised.</p> <p>The car parking standards in the Draft Plan have been drafted to take account of a wide range of objectives including Smarter Travel, the National Planning Framework, the ‘Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities’ (2018) along with changing commuting patterns and investments and the increasing availability of non-car modes as set out in Section 12.4.5 of the Draft Plan.</p> <p>In apartment developments, car parking is allocated to visitors and in zone 3, there is an allowance of an extra 10 per cent for visitor parking in recognition of lower levels of public transport services available.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Seeking flexibility in car parking standards for:</p> <ul style="list-style-type: none"> <li>Healthcare facilities and postal workers.</li> <li>Requests a caveat to Table 12.6 with regard to consultation with the HSE and other healthcare providers.</li> </ul>	<p><u><b>B0950</b></u> <u><b>B1004</b></u></p>		<p>The Executive notes the issue raised.</p> <p>It is considered that the Draft Plan allows for sufficient flexibility to accommodate special circumstances as set out in Section m12.4.5.2 which states <i>"In relation to the maximum standards, any proposals exceeding these standards will be permissible in exceptional circumstances, such as where the Planning Authority consider that there is a specific requirement for a higher number of spaces."</i></p> <p>It is not considered necessary to specifically call out certain workers such as healthcare or postal workers. This will be assessed as appropriate during the development management process.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Amend 'Table 12.6 Car Parking Zones and Standards' to include a row under 'Land Use' specifying 'Build to Rent' and note provision of car parking as 'Default Minimum' to align with Specific Planning Policy Requirement 8 of the 'Design Standards for New Apartments' Guidelines 2020.</p> <p>The guidelines allow for significantly reduced carparking at central locations.</p> <p>Standard carparking requirements should be omitted and replaced with assessment on a "case by case" basis.</p>	<p><u><b>B0801</b></u> <u><b>B0823</b></u> <u><b>B0889</b></u> <u><b>B0891</b></u> <u><b>B0960</b></u></p>		<p>The Executive notes the issue raised but does not agree.</p> <p>Page 254 of the Draft Plan states that:</p> <p><i>"The standards have also been informed by the 'Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities' (2018) including SPPR 8 and SPPR 9".</i></p> <p>In relation to car parking for BTR SPPR 8 (iii) states:</p> <p><i>"There shall be a default of minimal or significantly reduced car parking provision on the basis of BTR development being more suitable for central locations and/or proximity to public transport services. The requirement for a BTR scheme to have a strong central management regime is intended to contribute to the capacity to establish and operate shared mobility measures".</i></p> <p>Section 12.3.6 of the Draft Plan states with regard to BTR:</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><i>“In all instances, the applicant shall clearly demonstrate that the BTR development is located within a 10-minute walking time from high frequency public transport routes. Where any derogations in standards including standards relating to open space, car parking and storage are availed of, a condition should be attached to any grant of permission to state that planning permission must be sought for a change of tenure to another tenure model following the period specified in the covenant”.</i></p> <p>Furthermore, page 257 of the Draft Plan sets out that:</p> <p><i>“For the purposes of the parking standards set out in Table 12.6 below Built to Rent development are considered to be residential apartments. Where a Built to Rent scheme avails of lower car parking based on the nature of the use a condition should be attached to any grant of permission to state that planning permission shall be sought for a change of tenure to another tenure model following the period specified in the covenant”.</i></p> <p>It is, therefore, envisaged that the nature of the use of build to rent in terms of car parking will be recognised.</p> <p>It is noted that car a maximum of 1 space per unit is required for all apartments in zone 1 and a standard of 1 space for 1 and 2 beds, and 2 spaces for 3+ beds. The Draft Plan clearly sets out that deviations from the maximum or standard car parking requirements as set out in Table 12.6 are possible:</p> <p><i>“In certain instances, in Zones 1 and 2 the Planning Authority may allow a deviation from the maximum or standard number of car parking spaces specified in Table 12.6 or may consider that no parking spaces are required”.</i></p> <p>It is further noted that the detailed criteria for deviation from car parking standards is set out in Section 12.4.5.2(i) on p. 255-256. The type of criteria refers to <i>“particular nature, scale and characteristics of the proposed development”</i>, it also refers to availability of car sharing and bike/e-bike sharing facilities, etc.</p> <p>It is, therefore, not considered necessary to alter the Plan with regard to Build to Rent.</p> <p>It is also noted that the OPR have raised no issue in this regard.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><b>Recommendation</b> No change to Draft Plan.</p>
<p>v) Request that the northern part of a site on Brennanstown Road be included in zone 2 in the parking zone maps. Commissioning of Brennanstown Luas stop may not have been taken into account.</p>	<p><b><u>B0831</u></b></p>		<p>The Executive notes the issue raised but does not agree.</p> <p>It is noted that the Brennanstown Luas station is constructed but not commissioned and hence is not yet acting as a station. Zone 2 was made by mapping <i>inter alia</i> the walking distance from 10 minutes of a Luas station.</p> <p>It is stated on p.255 of the Draft Plan that: <i>“The Parking Zone Map is indicative and there may be potential for an area to move from one zone to another during the lifetime of the Plan due to local improvements in the pedestrian permeability which would increase the walkability catchment and/or future public transport provision including the Luas extension to Bray”.</i></p> <p>During the development management process changes in circumstances such as when the Luas stop becomes operational and the availability of permeability connections to it can be examined and hence the parking zone status of the site can change. This should be raised at the pre-planning stage. It is considered appropriate to recommend an amendment to the plan to refer to the pre-planning stage as the appropriate time to raise this issue.</p> <p>It is also considered appropriate to update the parking zones map to reflect the new permeability links which have been provided including those referred to in Section 3.5 above (from Belmont Estate to Old Kilgobbin Road and Sandyford Village).</p> <p><b>Recommendation</b> Insert the following text at the end of the first paragraph on p.255: <i><u>“In this regard the applicant shall engage with the Council on the potential to move to another parking zone during the pre-planning stage. It will be at the discretion of the Planning Authority if such a change is merited.”</u></i></p> <p><i><u>Update Supplementary Map T2 Parking Zones Map to take account for new permeability links from Belmont Estate to Old Kilgobbin Road and Sandyford Village.</u></i></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>vi) Submission considers that revised parking standards in some instances represent too drastic a reduction which would result in more undesirable longer trips for grocery shopping, bypassing locations such as the Park in Carrickmines (Quadrant 3).</p> <p>Submission also requests amendments to car parking as follows:</p> <ul style="list-style-type: none"> <li>Retain current Plan standards for Retail Supermarket, cafes, bars, restaurants, cinemas and offices.</li> </ul>	<p><b>B0981</b></p>		<p>The Executive notes the issue raised but does not agree.</p> <p>It should be noted that this submission considers that this area (Park in Carrickmines) is suburban in character and hence higher car parking standards should be allowable as per the 2016 Plan. Specifically, an amendment is requested to car parking as follows: Retain current Plan standards for Retail Supermarket, cafés, bars, restaurants, cinemas, and offices.</p> <p>In accordance with the Draft Plan this area is located in Parking Zone 2 due to being within the 10-minute walking catchment of Ballyogan Wood Luas Stop.</p> <p>Section 12.4.5.4 sets out that <i>“Local non-peak trips such as retail should be facilitated by more sustainable modes of transport and should also have reduced car parking”</i>.</p> <p>It is noted that there is a high car parking to retail ratio already available in the Park in Carrickmines. It is further noted that the OPR and TII in their submissions on the Draft Plan, as set out in Section 2.1 and Section 3.5 and have specifically referred to this area as being of concern as there are capacity issues on the M50 and to Junction 15. The specifics of Carrickmines in terms of car parking requirements will be subject to a detailed assessment through the development management process.</p> <p>It is not considered appropriate to retain the current car parking standards for retail supermarkets, cafés, restaurants, and offices. The standards have been amended in this plan to reflect national policy as set out in Section 12.3.4 of the Draft Plan to achieve modal shift from the private car to more sustainable modes.</p> <p>While it is generally not proposed to amend the standards set out in Table 12.6 Car parking Standards there is some validity in adding an extra standard to cover retail Convenience &gt;1000 sq. meters (supermarkets) in view of accommodating the weekly family shop. It is considered appropriate for all the reasons set out above that this should be at an increased standard from the existing Plan.</p> <p>In addition, there is a need to correct a typographical errors in Table 12.6 where the word ‘Standard’ is used instead of ‘Maximum’. The table sub-headings should read ‘Maximum’ for all uses other than houses and apartments in Zones 2, 3 and 4.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation																		
			<p><b>Recommendation</b> Amend all 7 sub-headings beginning after ‘Other Use’s for the rest of Table 12.6 Car Parking Zones and Standards, From after Apart 3+ bed:</p> <table border="1" data-bbox="1055 440 2074 475"> <tr> <td><i>Other Uses</i></td> <td><i>Criterion</i></td> <td><i>Maximum</i></td> <td><i>Standard</i></td> <td><i>Standard</i></td> <td><i>Standard</i></td> </tr> </table> <p>to:</p> <table border="1" data-bbox="1055 541 2074 608"> <tr> <td><i>Other Uses</i></td> <td><i>Criterion</i></td> <td><i>Maximum</i></td> <td><i>Standard Maximum</i></td> <td><i>Standard Maximum</i></td> <td><i>Standard Maximum</i></td> </tr> </table> <p>Insert the following row after Retail:</p> <table border="1" data-bbox="1055 673 2074 770"> <tr> <td><i>Retail Conv &gt;1000 sq m (supermarket)</i></td> <td><i>GFA</i></td> <td><i>1 per 60</i></td> <td><i>1 per 30</i></td> <td><i>1 per 20</i></td> <td><i>n/a</i></td> </tr> </table>	<i>Other Uses</i>	<i>Criterion</i>	<i>Maximum</i>	<i>Standard</i>	<i>Standard</i>	<i>Standard</i>	<i>Other Uses</i>	<i>Criterion</i>	<i>Maximum</i>	<i>Standard Maximum</i>	<i>Standard Maximum</i>	<i>Standard Maximum</i>	<i>Retail Conv &gt;1000 sq m (supermarket)</i>	<i>GFA</i>	<i>1 per 60</i>	<i>1 per 30</i>	<i>1 per 20</i>	<i>n/a</i>
<i>Other Uses</i>	<i>Criterion</i>	<i>Maximum</i>	<i>Standard</i>	<i>Standard</i>	<i>Standard</i>																
<i>Other Uses</i>	<i>Criterion</i>	<i>Maximum</i>	<i>Standard Maximum</i>	<i>Standard Maximum</i>	<i>Standard Maximum</i>																
<i>Retail Conv &gt;1000 sq m (supermarket)</i>	<i>GFA</i>	<i>1 per 60</i>	<i>1 per 30</i>	<i>1 per 20</i>	<i>n/a</i>																
<p>vii) In terms of car parking in Cherrywood:</p> <ul style="list-style-type: none"> <li>Submission states that Cherrywood should be designated as Parking Zone 1 not Zone or if retained, Cherrywood Town Centre (Plots TC 1 – 4) should be included in Parking Zone 1.</li> <li>Approach to car parking that is set out in 2018 Apartment Guidelines should be applied. Applicants should be allowed to demonstrate that the approach set out in the guidelines can be justified. This approach should also be applied in Cherrywood as recent amendment still exceeds apartment guidelines.</li> </ul>	<p><b><u>B1067</u></b> <b><u>B1120</u></b> <b><u>B1145</u></b></p>		<p>The Executive notes the issues raised.</p> <p>The Cherrywood Planning Scheme is made and amended under a separate legislative process to the County Development Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>																		
<p>viii) Support for car sharing particularly for higher density schemes should be provided in the Plan.</p>	<p><b><u>B0891</u></b></p>		<p>The Executive notes and agrees with the issue raised.</p> <p>The Draft Plan provides support for car sharing under Policy Objective T17: Car Sharing. The availability of car sharing is one of the criteria which allow for the deviations from the car parking standards as set out in Section 12.4.5.2(i) Assessment Criteria for deviation from Car Parking Standards (p. 255).</p>																		

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.12.9.4: Section 12.4.6 Cycle Parking</b>			
<p>i) The submission suggested that DLR should:</p> <ul style="list-style-type: none"> <li>• Exempt cycle sheds/bunkers from needing planning permission.</li> <li>• Have an objective to retrofit existing residential areas/areas to be taken in charge with semi-public bike parking/ bike bunkers.</li> <li>• Include new cycle standards in County Development Plan.</li> </ul>	<p><b><u>B0319</u></b> <b><u>B1088</u></b></p>		<p>The Executive notes the issues raised.</p> <p>Exemption of planning permission is by way of Planning Legislation, and hence is beyond the remit of the Planning Authority. <b>Regarding the retrofitting of bike parking this is an operational issue which is beyond the scope of the County Development Plan.</b></p> <p>New bicycle parking standards will be prepared during the lifetime of the County Development Plan, and they will be aligned with the carparking zones as set out in Section 12.4.6.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) In terms of cycle parking the submissions note:</p> <ul style="list-style-type: none"> <li>• People living in apartments and terraced houses need secure cycle parking.</li> <li>• Recommends cycle parking at ground level for visitors and residents.</li> <li>• In residential developments make bike parking more accessible than car parking to encourage more bike use.</li> <li>• More bike racks need to be installed in apartment blocks and housing complexes.</li> <li>• New developments should require cycle parking and EV charge points, as standard.</li> <li>• Requirements for showers and drying rooms for new school/office development.</li> </ul>	<p><b><u>B0406</u></b> <b><u>B0780</u></b> <b><u>B0885</u></b> <b><u>B1088</u></b></p>		<p>The Executive notes the issues raised which are all covered in the Draft Plan.</p> <p>The cycle parking standards are set out in the Council’s document ‘Standards for Cycle Parking and Associated Cycling Facilities for New Developments’ (2018). New bicycle parking standard will be prepared during the lifetime of the County Development Plan, and they will be aligned with the carparking zones as set out in Section 12.4.6 Cycle Parking.</p> <p>In addition to this Sections 12.4.6 Cycle Parking, 12.4.6.1’ Requirements for New Developments’ and 12.4.6.2 ‘Cycle Parking Assessment Criteria’, cover cycle parking requirements with <i>“the objective of providing the infrastructure necessary to encourage more people to use cycling for their everyday mobility needs”</i>.</p> <p>The issue of ease of access to cycle parking and requirements a cycle parking to be located ground level for multi-storey car parks is covered therein. Showers, changing facilities and lockers are required for places of employment as set out in Section 4.4.1 of the Council’s cycle parking standards. EV standards are set out in Section 12.4.11 of the Draft Plan.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
No change to Draft Plan.			
<b>3.12.9.5: Section 12.4.8 Vehicular Entrances and Hardstanding Areas</b>			
i) Submission requests that all car parks should be permeable.	<b><u>B0314</u></b>	10	<p>The Executive notes and agrees with the contents of the submission.</p> <p>Section 12.4.8 of the Draft Plan requires that car parks must be constructed in accordance with Sustainable Drainage Systems (SuDS). Section 7.1.3 of Appendix 7: Sustainable Drainage System Measures sets out the details relating to same (See also section 3.21 for amendment in relation to SuDS).</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<b>3.12.9.6: Section 12.4.8.4 ACAs/Protected Structures</b>			
i) Submissions requests that the Council considers: <ul style="list-style-type: none"> <li>• Permitting off-street parking to the dwelling at Nos. 10-15 Breffni Terrace to address the congestion and traffic related issues.</li> <li>• Permitting off-street parking to the dwelling at 2 to 6 Sandycove Avenue West to address the congestion and traffic related issues.</li> </ul>	<b><u>B0507</u></b> <b><u>B0841</u></b> <b><u>B0894</u></b> <b><u>B0937</u></b> <b><u>B0972</u></b> <b><u>B0993</u></b> <b><u>B1128</u></b> <b><u>B1138</u></b> <b><u>B1152</u></b> <b><u>B1154</u></b> <b><u>B1161</u></b> <b><u>B1179</u></b> <b><u>B1180</u></b> <b><u>B1185</u></b> <b><u>B1186</u></b>	4	<p><b>The Executive notes the issues raised. They are both considered to be Development Management issues and not County Development Plan issue. Permission cannot be given via the Development Plan.</b> It is noted that the houses at Breffni Terrace are Protected Structures.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
ii) Submission states that pastiche style developments should be allowed in ACAs for example infill or end of terrace on a Victorian terrace.	<b><u>B1205</u></b>		<p>The Executive notes the issue raised. Section 12.11.4 'New Development within an ACA', of the Draft Plan does not expressly prohibit pastiche design but does encourage development that is complementary and sympathetic to the area without imitating earlier styles. This is in accordance with Section 3.10.1 of the "Architectural Heritage Protection Guidelines for Planning Authorities" which states:</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><i>“When it is proposed to erect a new building in an ACA, the design of the structure will be of paramount importance. .... The greater the degree of uniformity in the setting, the greater the presumption in favour of a harmonious design. However, replacement in replica should only be contemplated, if necessary, for example, to restore the character of a unified terrace and should be appropriately detailed. Where there is an existing mixture of styles, a high standard of contemporary design that respects the character of the area should be encouraged”.</i></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.12.9.7: Section 12.4.11 Electrically Operated Vehicles</b>			
<p>i) Submissions request the following:</p> <ul style="list-style-type: none"> <li>• Planning permissions include that 50% of allocated parking in new developments have EV charging installed.</li> <li>• New builds should include charging stations for electric cars.</li> <li>• Car parking should be future proofed to accommodate electric vehicles.</li> <li>• If off street car parking is being provided to charge EVs then the practise of charging for the removal of on-street parking should be ended.</li> </ul>	<p><b>B0587</b> <b>B0839</b> <b>B1047</b> <b>B1205</b></p>		<p>The Executive welcomes the support provided and notes the issue raised.</p> <p>Section 12.4.11 Electrically Operated Vehicles of the Draft Plan states that the Council will <i>“encourage the use of Electric Vehicles (EV), in line with Council, National Policy and Standards, developments shall provide at minimum EV Charging points”</i>, and notes the following requirements,</p> <ul style="list-style-type: none"> <li>• <i>“Residential multi-unit developments both new buildings and buildings undergoing major renovations (with private car spaces including visitor car parking spaces) - a minimum of one car parking space per five car parking spaces should be equipped with one fully functional EV Charging Point. Ducting for every parking space shall also be provided.</i></li> <li>• <i>New dwellings with in-curtilage car parking -the installation of appropriate infrastructure to enable installation at a later stage of a recharging point for EVs.”</i></li> </ul> <p>The practice of charging for removal of on street car parking relates to when a proposed development results in loss of on street spaces and is not related to provision of EV charge points.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.12.10: Section 12.6 Town and Village and Retail Development</b>			

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
i) Request that Section 12.6.1 be amended as follows; <i>The provision within the overall design of the scheme for public facilities, e.g. toilets, advice centres, and supporting community, civic and cultural uses including festival activities or events, health clinics, crèches, theatres, libraries for example.</i>	<b>B1095</b>		The Executive notes the issue raised and agrees with the sentiments of the proposed amendment however, it is acknowledged that such events may be subject to separate licensing.  <b>Recommendation</b> No change to Draft Plan.
<b>3.12.11: Section 12.6.8 Shopfronts, Signage, Advertising and Public Art</b>			
i) Submission recommends that Sections 12.6.8 Shopfronts, Signage, Advertising and Public Art and 12.9.10 Public Lighting be reviewed to take account of impact of signage, lighting or any other structure along roads running parallel or buildings alongside the railways. In this regard reference to and requirements of TII's 'Code of engineering practice for works on, near, or adjacent the Luas light rail system' and TII's Light Rail Environment - Technical Guidelines for Development PE-PDV-00001 December 2020, should be made.	<b>B0192</b>		The Executive notes the issue raised and agrees with the contents of the submission.  <b>Recommendation</b> Amend Section 12.6.8 Shopfronts, Signage, Advertising and Public Art, specifically Section 12.6.8.2 Signage (p. 272-273) to include an additional paragraph as follows: <i>"Applications for signage shall also be considered having regard to the impact of any proposed signage, associated lighting or any other structure along roads running parallel to or buildings alongside the railways. In this regard reference, to and requirements of TII's 'Code of engineering practice for works on, near, or adjacent the Luas light rail system' and TII's Light Rail Environment - Technical Guidelines for Development PE-PDV-00001 December 2020 (or any superseding document) should be made".</i>  Amend Section 12.9.10 Public Lighting, specifically Section 12.9.10.2 Street Lighting (p. 293) to include an additional paragraph as follows: <i>"Street Lighting shall also be considered having regard to any signage, associated lighting or any other structure along roads running parallel to or buildings alongside the railways. In this regard reference, to and requirements of TII's 'Code of engineering practice for works on, near, or adjacent the Luas light rail system' and TII's Light Rail Environment - Technical Guidelines for Development PE-PDV-00001 December 2020 (or any superseding document) should be made".</i>
<b>3.12.13: Section 12.7 Green Infrastructure and Biodiversity</b>			
<b>3.12.13.1: Section 12.7.4 Fencing of Hitherto Open Landscape</b>			

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
i) With respect to Section 12.7.4 Fencing of Hitherto Open Landscape, the submission suggests that the wording be reviewed and altered.	<b><u>B0594</u></b>		<p>The Executive notes the issue raised.</p> <p>The existing policy text with respect to Fencing of Hitherto Open Landscape within the Draft Plan was drafted following a similar submission made back in 2015. It is considered that existing Policy Objective wording is sufficiently robust and deliberately worded to achieve the aims of the Council with regard to Fencing of Hitherto Open Landscape, and that additional policies in this regard are neither required nor necessary.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.12.14: Section 12.8 Open Space</b>			
<b>3.12.14.1: Section 12.8.1 Landscape Design Rationale</b>			
i) Submission suggests that the Plan require higher standards in design and planting mix to support biodiversity, carbon sequestration and the creation of wildlife and pollination corridors across the County and refer to the ecosystem service approach.	<b><u>B1088</u></b>		<p>The Executive notes the issue raised.</p> <p>The following Sections within Chapter 12 provide specific guidance with respect to planting, biodiversity, carbon sequestration, wildlife and pollination corridors and ecosystem service approach and should be read in conjunction with the specific Policy Objectives contained in both Chapter 8 Green Infrastructure and Chapter 9 Open Space, Parks and Recreation.</p> <ul style="list-style-type: none"> <li>• 12.2.6 Urban Greening.</li> <li>• 12.7 Green Infrastructure and Biodiversity.</li> <li>• 12.8 Open Space and Recreation.</li> <li>• 12.8.6 Biodiversity and SuDS in both Public and Communal Open Space.</li> <li>• 12.8.11 Existing Trees and Hedgerows.</li> </ul> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.12.14.2: Section 12.8.3 Open Space Quantity for Residential Development</b>			
i) The submissions note the follows issues: <ul style="list-style-type: none"> <li>• There is no basis for the requirement for an additional 5% (15% versus 10%) public open space for residential development within the existing built-up area. It is therefore requested that 'Table 12.8 Public Open Space</li> </ul>	<b><u>B0529</u></b> <b><u>B0801</u></b> <b><u>B0805</u></b> <b><u>B0811</u></b> <b><u>B0823</u></b> <b><u>B0831</u></b>		<p>The Executive notes the issue raised and would concur that the requirement should be 10%.</p> <p>It is considered that the public open space requirements for residential developments as indicated on Table 12.8 (page 280) of the Draft Plan should have regard to the Section 28 Guidelines '<i>Sustainable Residential Development in Urban Areas</i>' (2009) and the Core Strategy.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>Requirements for residential developments' is amended to align with the provisions of 'Sustainable Residential Development in Urban Areas' Guidelines 2009. (15% to 10% for existing built-up area).</p> <ul style="list-style-type: none"> <li>• Seek retention of 10% open space in existing built-up area as set out in current Plan.</li> <li>• The 15% requirement is clearly in conflict with Section 28 Guidelines on 'Sustainable Residential Development in Urban Areas' which recommends a minimum of 10% on infill /brownfield sites.</li> <li>• Considers that the 15% open space standard is unworkable and impractical, particularly on sites within the designated Town and District.</li> <li>• The option for a financial contribution to be provided 'in lieu' is double charging of levies towards public open space.</li> <li>• Submission seeks an amendment from 15% to 10% in Section 12.8.3.1 / Table 12.8 of the Draft Plan.</li> </ul>	<p><b><u>B0836</u></b>  <b><u>B0848</u></b>  <b><u>B0887</u></b>  <b><u>B0889</u></b>  <b><u>B0891</u></b>  <b><u>B0960</u></b>  <b><u>B1072</u></b>  <b><u>B1134</u></b></p>		<p>Section 4.20 of the aforementioned Guidelines states that:  <i>"In green-field sites or those sites for which a local area plan is appropriate, public open space should be provided at a minimum rate of 15% of the total site area ...  In other cases, such as large infill sites or brown field sites public open space should generally, be provided at a minimum rate of 10% of the total site area; ...  In Institutional sites ... a minimum requirement of 20% of site area should be specified; however, this should be assessed in the context of the quality and provision of existing or proposed open space in the wider area."</i></p> <p>These minimum standards for public open space are considered appropriate for proposed residential schemes. Within the built-up area the minimum 10% requirement takes into account that there may already be existing parks and open spaces in any area.</p> <p>For greenfield sites, the 15% minimum applies because there is a lack of established open space and/or parks/incidental open space.</p> <p>The development financial contribution in lieu, under Section 48 of the Planning and Development Act, 2000, (as amended), is for any shortfall in the open space quantum provided and goes towards the provision and/or improvement of a community, cultural or civic facility that the residents of the proposed development will benefit from.</p> <p><b>Recommendation</b>  Amend Table 12.8 'Public Open Space Requirements for residential developments' (p.280) from:</p> <p><i>"Residential Development in the existing built up area – 15% (of site area)"</i></p> <p>To:</p> <p><i>"Residential Development in the existing built up area – 150% (of site area)"</i></p>
<p>ii) Raises concerns with the application of an area-based standard for open space and considers that the current population based equivalent open space</p>	<p><b><u>B1012</u></b></p>		<p>The Executive notes the issue raised.</p> <p>Significant work was carried out in relation to open space standards as part of the preparation of the current 2016 – 2022 Plan and as part of the preparation of the Draft Plan. In the current</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>requirement represents a much more appropriate method.</p>			<p>Plan there was a move away from the class one and two standards as set out in the 2010 Open Space Strategy as there were differing interpretations of what they meant.</p> <p>A new approach was put forward following review of standards used by other local authorities and work with the parks and landscape section. A new standard of 15 – 20 sq. metres per bed space was introduced. There was also a default of 10% which is in line with our sister Dublin Authorities and Cork County Council.</p> <p>Implementation of the current standards has been hampered by the apartment guidelines which have a differing standard. Many schemes simply apply the default 10% as the 15 sq. m per bed space creates challenges particularly for high density schemes where the bed space requirements can exceed the entire site area. Several differing options were explored as part of the preparation of the Draft Plan and the new proposals as put forward in the Draft Plan which include differing standards for public, communal and private open space were trialed on a variety of permitted residential schemes within the County and were considered to offer the optimum provision of various types of open space.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submissions request:</p> <ul style="list-style-type: none"> <li>• That the open space requirement for INST is corrected to 25%.</li> <li>• Notes provision of 20% open space for INST in section 12.3.8.11 conflicts with Section 12.8.3.1.</li> <li>• Request that discrepancy between open space requirements within Section 12.3.8.11 and Table 12.8 of Section 12.8.3.1. is corrected to provide clarity surrounding the open space requirement for institutional land.</li> <li>• Request that open space requirements for institutional and SNI zoned lands should be 20% as recommended in the Sustainable Residential Development in Urban Areas, 2009.</li> </ul>	<p><b><u>B0529</u></b> <b><u>B0906</u></b> <b><u>B0960</u></b> <b><u>B1012</u></b> <b><u>B1043</u></b> <b><u>B1134</u></b></p>		<p>The Executive notes the various issues raised and the differing views in relation to the provision of public open space for institutional lands. There was a discrepancy in the Draft Plan whereby there were two differing standards set out one at 20% and one at 25%. It is noted that 25% was the standard agreed by the members.</p> <p>Notwithstanding the above, the Executive agrees with the requests put forward in submissions received that 20% is the appropriate standard for provision of public open space on Institutional lands as set out in the 2009 Section 28 Guidelines “Sustainable Residential Development in Urban Areas”.</p> <p>It is considered that this is also the appropriate standard for any non SNI related development on lands which carry the new SNI land use zoning objective.</p> <p>As acknowledged in Section 12.3.2.1 of the Draft Plan, it is considered that retaining a minimum of 20% usable open space in development proposals will ensure that the recreational value of the lands is maintained. However, Section 12.3.2.1 also notes “This may</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> <li>Where development is proposed on SNI lands, that to maintain the recreational value of the site a minimum of 20% of usable open space be retained. In the interests of consistency, it is submitted that this figure should be increased to 25% to be the equivalent of that required on institutional lands.</li> </ul>			<p><i>not apply where an existing facility is located within a more urban, mixed use setting, as identified by SLO 10 and SLO 22".</i></p> <p><i>(This recommendation has already been put forward in section 3,4 above)</i></p> <p><b>Recommendation</b> See recommendation in Section 3.4 above</p>
<p>iv) Notes new distinction between public and communal open space and consider this requirement could compromise the design and layout of residential proposals.</p>	<b><u>B0891</u></b>		<p>The Executive notes the issue raised.</p> <p>The Executive considers that the new requirements will be an improvement of current standards, will be in accordance with the Section 28 Apartment Guidelines and will provide considerable benefits for residents of apartment schemes in that there will be both communal and public open space provided.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>v) Request reduction of open space standard on SNI sites not currently used for recreational purposes and with good access to public transport. (Submission references 20% requirement and not 25% requirement).</p>	<b><u>B1244</u></b>		<p>The Executive notes the issue raised.</p> <p>While the contents of the submission are noted with respect to a reduction in the required quantum of open space for SNI sites currently used for recreational purposes, in order to ensure that adequate open space is reserved on site to serve the proposed development, the 20% public open space requirement should, therefore, be retained.</p> <p>However, this will be assessed on a case-by-case basis and the Draft Plan also allows deviation in relation more urban sites in Section 12.3.2.1 which states that <i>"This may not apply where an existing facility is located within a more urban, mixed use setting, as identified by SLO 10 and SLO 22"</i>.</p> <p><b>Recommendation</b> No change to Draft Plan. *See section 3.4 above.</p>
<p>vi) Submission requests that every development should be required to manage density so as to provide the</p>	<b><u>B0271</u></b>		<p>The Executive notes the issue raised.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
required public open space as part of the development.			<p>When assessing any planning application for a residential scheme, density is assessed, along with the relationship of any proposed density with the provision of open space.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
vii) Submission requests that picnic tables, benches and litter bins, dog paddocks and cycle parking are added to the hard landscaping list set out in Section 12.8.1.	<b>B0406</b>		<p>The Executive notes the issue raised.</p> <p>The following issues raised relate to operational and maintenance issues and are not strategic County Development Plan issues: picknick tables, benches and litter bins, dog paddocks.</p> <p>Section 12.4.6 of the Draft Plan is dedicated to 'Cycle Parking', and the requirements of same are included therein.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
viii) Submission considers that the size of roof garden which can contribute to communal open space should not be limited to 30% but should be dealt with on a case-by-case basis.	<b>B0887</b> <b>B0891</b> <b>B1072</b>		<p>The Executive notes the issue raised.</p> <p>For larger apartment schemes in excess of 50 units it is considered important that no more than 30% of the communal open space shall be provided by way of a roof garden. Roof gardens can offer good amenity, but they do not provide the same standard of amenity as at grade space particularly for young children. A portion of the communal open space should be at grade. Section 12.8.5.4 of the Draft Plan does provide some flexibility for smaller infill schemes where there is only scope for a roof garden.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.12.15: Section 12.9 Environmental Infrastructure</b>			
<b>3.12.15.1: Section 12.9.2 Noise pollution and Noise Nuisance</b>			

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>i) Concern expressed in relation to the requirement now contained in the Draft Plan which allows Planning Authority ask for an acoustic assessment. Concern relates to the scenario where a developer refuses to provide one and considers that the Plan does not address this issue.</p> <p>Considers that it is dangerous and questionable to rely on any acoustic assessment carried out by a developer and consider that DLR should provide the assessment.</p> <p>Sets out concerns in relation to any legal challenges.</p>	<p><b>B0674</b></p>		<p>The Executive notes the issues raised.</p> <p>The Draft County Development Plan includes many requirements for various technical reports which may be required to be submitted as part of any planning application for development. Such reports include, for example an <i>Architectural Heritage Impact Assessment</i> which must be submitted with any application for works to a protected structure, an <i>Ecological Impact Assessment</i> which may be required where it is considered that there is potential for impact on an environmentally sensitive area, <i>Traffic and transport Assessment</i> where a new development will generate significant car trips. The requirement for these reports is in some instances set out in the thresholds document which forms Appendix 3 of the Draft Plan or may be set out within the Witten statement. Often the requirement is discussed at preplanning stage, or it can also be requested by way of further information. The failure of an applicant to submit a report required or requested is dealt with via the Development Management process. The same would apply to any request for an acoustic assessment. Therefore, it is not considered that the Draft Plan needs to address the concern about the lack of submission of a report as the Development Management process deals with this issue. The criticism in relation to the inclusion in the Plan of a requirement for an Acoustic Design Assessment is considered unwarranted as this inclusion strengthens the Plan when dealing with applications for noise sensitive uses.</p> <p>The Planning Authority do not agree that it is questionable to rely on any acoustic assessment carried out by a developer. All technical reports submitted as part of any application for development are prepared by the relevant technical experts employed by any applicant. The standards that apply for acoustic design process for residential developments are a matter for National Policy. Draft National guidelines on acoustic design process are currently in the process of being prepared. It would not be appropriate, practical, or possible for the Planning Authority to prepare reports on behalf of developers. The Planning Authority would not agree that it is dangerous and questionable to rely on any acoustic assessment carried out by a developer as any report would be carried out by an accredited technical expert in the required field. The Planning Authority or any third party may query content of any such report, but they would not prepare such reports.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>ii) Submission requests the following:</p> <ul style="list-style-type: none"> <li>• That the Draft Plan should make it clear that the legal onus to prevent noise nuisance rests with the Local Authority. Current Draft fails to address this requirement.</li> <li>• That the Draft Plan is amended to direct that DLR is obligated to attach conditions when dealing with food and beverage uses adjacent to family homes.</li> <li>• That the condition used by Dublin City Council is appropriate. This conditions states that <i>“Noise and vibration from the development must be inaudible and imperceptible at the nearest sensitive premises”</i>. Another suggested wording is also given.</li> <li>• The Draft Plan should be very prescriptive. Suggested condition is provided as follows <i>“Noise and vibration from a commercial development seeking to locate beside existing family homes must not be granted permissions unless the noise it will make will in inaudible and imperceptible at the nearest sensitive premises”</i>.</li> <li>• Considers that the Draft Plan should state that it is a planning goal to prevent development from breaching Section 108 of the EPA Act and creating a noise nuisance for residents.</li> </ul>	<p><b>B0674</b></p>		<p>The Executive notes the issues raised.</p> <p>Section 12.9.2 Noise Pollution and Noise Nuisance and Section 12.9.3 Noise, Odour and Vibration Generating Uses of the Draft Plan were drafted following on from a strategic Direction received from an elected member at pre-draft stage, consultation with the EHO and work with the development Management teams and the noise pollution sections of the Council. These sections contain more detailed requirements than were set out in the 2016 Plan including the requirement for developers to submit an Acoustic Design Assessment where a noise sensitive use is proposed in an area that may have high pre-existing environmental sound levels.</p> <p>In relation to the legal requirement of section 34, that Act states that <i>“Conditions under subsection (1) may, without prejudice to the generality of that subsection, include all or any of the following”</i>. It is noted that the word <i>may</i> is used which gives discretion as to when conditions are attached. It is recommended that the Draft Plan reference that the Planning Authority may attach conditions as set out under Section 34 to reduce or prevent any development from causing any noise or vibration that might give reasonable cause for annoyance to persons in any premises in the neighbourhood.</p> <p>While the submission of exact wording for suggested conditions is noted, the County Plan does not provide the wording for future conditions on any planning application. Some standard conditions are used on grants of permission but conditions in relation to noise on any particular grant of permission would be informed by a report from the EHO. Conditions may be drafted on a case-by-case basis so as to be tailored to a particular application.</p> <p>The Executive would consider it inappropriate to add a “planning goal” in the Draft Plan which relates to a separate code to the Planning code.</p> <p><b>Recommendation</b>  Amend Section 12.9.2 by deleting the first bullet point (p. 289) as follows:  <i>“To require the Planning Authority to acknowledge its legal responsibility to attach planning conditions on permissions granted to prevent the development from causing a noise nuisance for adjacent occupiers”</i>.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>To be replaced with the following text:</p> <p><u>To attach planning conditions on relevant permissions granted to reduce or prevent the development from causing any noise or vibration that might give reasonable cause for annoyance to persons in any premises in the neighbourhood, as per Section 34(4)(c) of the Planning Act.</u></p> <p>Amend Section 12.9.3 (p.289) as follows:</p> <p>From:</p> <p><i>“In considering applications for development where the proposed use may cause noise, vibrations and air emissions (for example, gyms, public houses, leisure facilities, restaurants and retail) applicants will be required to demonstrate that consideration has been given to the ventilation strategy for buildings at the design stage, to prevent noise, vibration and air emissions that may cause nuisance from equipment and ducting. The design of buildings and services should consider and incorporate acoustic attenuation and mitigation as required, to ensure that the operational phase of the development does not generate unacceptable noise levels or odour nuisance within the receiving environment.</i></p> <p>To:</p> <p><i>“In considering applications for development where the proposed use may cause noise, vibrations and air emissions (for example, gyms, public houses, leisure facilities, restaurants and retail) applicants will be required to demonstrate that consideration has been given to the ventilation strategy for buildings at the design stage, to prevent noise,, to minimise the causing of any noise or vibration that might give reasonable cause for annoyance to persons in any premises in the neighbourhood, as per Section 34(4)(c) of the Planning Act, and air emissions that may cause nuisance from equipment and ducting. The design of buildings and services should consider and incorporate acoustic attenuation and mitigation as required, to ensure that the operational phase of the development does not generate unacceptable noise levels or odour nuisance within the receiving environment”.</i></p>
<p>iii) Submission requests responses to issues raised in relation to among other issues, meetings held, an expert panel review carried out which includes legal</p>	<p><b>B0674</b></p>		<p>The Executive notes the issues raised. These issues relate to previous meetings held and to individual planning applications and enforcement cases. <b>They do not relate to the Draft Plan.</b></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
opinions, a Freedom of Information (FOI) request and a residents' deputation meeting, all relating to Monkstown Village and noise and odour nuisance.			<p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Where rock strata occur at or near surface level, underground car parks should not be permitted due to the noise levels emanating from such sites during construction.</p> <p>Mitigation measures are not sufficient.</p> <p>County Development Plan must include adequate enforcement measures to dissuade developers submitting token noise abatement measures.</p>	<b>B1105</b>		<p>The Executive notes the issues raised.</p> <p>To place a blanket ban on underground car parking in areas where rock occurs close to the surface is not considered an appropriate or reasonable response to noise issues that occur at construction phase.</p> <p>The rock extraction method on a given site is a matter for specialist design and needs to take account of proposed development, the local geology, and other relevant factors.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>v) Submission expresses concern in relation to noise pollution associated with high density living.</p>	<b>B0905</b>		<p>The Executive notes the issue raised.</p> <p>Section 12.9.2 'Noise Pollution and Noise Nuisance' of the Draft Plan states that "<i>the Planning Authority will use the Development Management process for larger developments or developments close to residential developments</i>" and provides guidance in this regard.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.12.15.2: Section 12.9.4 Construction Management Plans</b>			
<p>i) Submission considers that it is not possible for residents to input into construction management plans which impact upon them and their environment.</p> <p>Also requests the removal of footnote 1 on page 290 of the Draft Plan.</p>	<b>B0518</b>		<p>The Executive notes the issues raised.</p> <p>Under the Planning and Development Act any party can upon payment of a fee make a submission or observation on a planning application and such observation can address issues in relation to construction and construction management Plans (CMPs). Planning applications usually include a draft CMP and final CMPs are agreed at compliance stage as it only when a contractor is appointed that details of compounds, construction traffic flows etc can be agreed. Footnote 1 explains this detail. To remove the footnote would be removing relevant information from the Draft Plan that is considered important to retain to provide clarity.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			No change to Draft Plan.
ii) Construction traffic has damaged the Glenamuck Road.	<b>B0847</b>	9	The Executive notes the issue raised. <b>This is not a County Development Plan issue.</b>  <b>Recommendation</b> No change to Draft Plan.
<b>3.12.15.3: Section 12.9.5 Hours of Construction</b>			
i) To reduce the level of such nuisance, the 2022-2028 Development Plan needs to be more specific:  (i) Hours of Construction - After "Site development and building works shall be restricted to 7.00am to 7.00pm Monday to Friday and 8.00am to 2.00pm Saturdays." Include the following - "The first hour of which shall be for preparation of the working areas only".  (ii) Percussive Rock Breaking - for environmental reasons percussive rock breaking will not be permitted for more than two hours per day. When substantial rock excavation is anticipated or subsequently encountered, non-percussive methods of extraction shall be adopted to reduce any percussive element to less than two hours per day.	<b>B0963</b>		The Executive notes the issues raised.  The Environmental Enforcement section have reported that while it is appropriate to specify the overall construction hours for site development in the Development Plan, the detailed management of works on a construction site is not issue that can be addressed as part of the Plan. Limiting the first hour of works on any construction site to works <i>which shall be for preparation of the working areas only</i> would be difficult to define and would be unenforceable.  The rock extraction methods on a given site is a matter for specialist design and needs to take account of local geology and other relevant factors.  This level of detail is not a matter for the Development Plan and is addressed through the planning application process.  <b>Recommendation</b> No change to Draft Plan.
<b>3.12.15.4: Section 12.9.8 Telecommunications</b>			
i) Submission raises issues in relation to telecommunication proposals with specific refence to an application that was withdrawn. Submission considers that Section 12.9.8 which states that a communications mast 'shall not have a significant negative visual impact 'is therefore deeming a negative impact to be acceptable. Submission considers that noise and negative visual impact	<b>B0764</b>		The Executive notes the issue raised. All developments ranging from a house to a telecommunications mast have, - by the very nature that they comprise physical development - a visual impact, which in some instances may be negative. In relation to telecommunications proposals, the extent of the negative visual impact, mitigation measures proposed to deal with that visual impact, and other issues which may include noise has to be examined and weighed up in any individual assessment taking into account policy and national guidance. In the assessment of a telecommunications proposal such as a mast or antennae, which may have a negative visual impact in that it is introducing a new feature into the landscape of an area, what is key is whether it has a <u>significant</u> negative visual impact.

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>means that a communications mast should never be sited in a residential area.</p>			<p>In a predominantly suburban County such as DLR, to exclude telecommunications infrastructure from residential areas, would cover a significant portion of the built-up area and would cover a swath of zoning objectives.</p> <p>It would also mean that many mast sharing opportunities could not be explored which may result in additional unnecessary support structures. This could also have a major impact on the roll out of a viable and effective telecommunications network.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) With respect to Section 12.9.8 Telecommunications, the submission suggested that the fourth point should include the term “routes”.</p>	<p><b>B0594</b></p>		<p>The Executive notes the issue raised and accepts the proposed wording suggestion.</p> <p><b>Recommendation</b> Amend Section 12.9.8 Telecommunications (p. 293) from: <i>“Any impacts on rights-of-way and walking”</i></p> <p>To: <i>“Any impacts on rights-of-way and walking routes”</i></p>
<p><b>3.12.15.5: Section 12.9.10.1 Light Pollution</b></p>			
<p>i) Submission states that to reduce light pollution, lighting which accompanies any development should be appropriately designed, with the light source shielded or cowled, and the fixture directed straight downwards and that conditions could be attached at the planning approval stage on the type of lighting.</p>	<p><b>B0350</b></p>		<p>The Executive notes the issue raised.</p> <p>Section 12.9.10.1 ‘Light Pollution’ provides sufficient guidance regarding lighting fixtures and the amount of light produced. Where relevant conditions are attached to planning applications as required.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p><b>3.12.16: Section 12.10 Drainage and Water Supply</b></p>			
<p>i) With respect to Section 12.10 Drainage and Water Supply, the submission suggests that the title does not reflect the provisions therein and another title should be considered.</p>	<p><b>B0594</b></p>		<p>The Executive notes the issue raised and agrees with the suggestion. The subtitle “Drainage and Water Supply”, from the existing 2016-2022 County Development Plan was retained in the Draft Plan. However, it is acknowledged that the contents of this subsection relate to drainage, coastal and water issues.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p><b>Recommendation</b> Amend the title Section 12.10 Drainage and Water Supply (p.294) from: <i>"12.10 Drainage and <del>Water Supply</del>"</i></p> <p>To: <i>"12.10 Drainage, Flood Risk and Coastal Erosion"</i></p>
<b>3.12.16.1: Section 12.10.2 Coastal Issues - Erosion/Flooding/Recreation</b>			
<p>i) With respect to Section 12.10.2 Coastal Issues - Erosion/Flooding/ Recreation, the submission requests that an additional subsection should be included (taken from other County Development Plans in the Country): Tourism and Recreational Development as follows:</p> <p>"Tourism and recreational development shall be assessed against the nature and scale appropriate to the character of the area and shall be located to be visually sympathetic to its surroundings".</p>	<b>B0594</b>		<p>The Executive notes the issue raised.</p> <p>It is considered that existing policy wording in Section 12.10.2, is sufficiently robust and deliberately worded to achieve the aims of the Council regarding Coastal Issues, and an additional policy with respect to 'Tourism and Recreational Development', in this regard are neither required nor necessary.</p> <p>Section 9.4 'Sports and Play', of the Draft Plan references tourism and recreational development.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.12.17: Section 12.11 Heritage</b>			
<p>i) With respect to Section 12.11 Heritage the submission requests that an additional subsection be included as follows:</p> <p><i><b>In assessing applications for new quarries or extension to existing quarries the Council will have regard to the <b>visual impact</b> on the environment, landscape, archaeology including proposed mitigation measures. (Taken from Louth Draft).</b></i></p> <p><i><b>In assessing individual development proposals the following criteria will be taken into account: The</b></i></p>	<b>B0594</b>		<p>The Executive notes the issue raised.</p> <p>It is considered that existing policy wording in Section 12.11, is sufficiently robust and deliberately worded to achieve the aims of the Council with regard to Heritage, and that additional policies in this regard are neither required nor necessary.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p><i>impact on landscape and public rights of way and walking routes, mitigation features where impacts are inevitable, protection of NHAs, SPAs, areas of scenic importance and national monuments including the cumulative impact of the proposal. (Taken from <b>Meath Draft</b>).</i></p>			



### 3.13: Chapter 13 - Land Use Zoning

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<b>3.13.1: Table 13.1.1 Development Plan Zoning Objectives</b>			
<p>i) Various submissions suggest that Build to rent should be omitted as a separate use class as its inclusion is not allowed for under the Planning and Development Act and note the following:</p> <ul style="list-style-type: none"> <li>• A distinction between BTR and residential would be contrary to government policy.</li> <li>• If retained Build to Rent should be permitted in principle under “NC”, A, A1 and A2 zoning.</li> <li>• Request that BTR should be removed as a separate use class or else incorporated as permitted in principle in all land use zoning objectives.</li> <li>• Request that Build to Rent is included within the Permitted in Principle matrix in all residential zoning categories i.e. Zoning Objectives A, A1, and A2</li> </ul>	<p><b><u>B0581</u></b>  <b><u>B0596</u></b>  <b><u>B0596</u></b>  <b><u>B0801</u></b>  <b><u>B0805</u></b>  <b><u>B0831</u></b>  <b><u>B0836</u></b>  <b><u>B0843</u></b>  <b><u>B0848</u></b>  <b><u>B0887</u></b>  <b><u>B0889</u></b>  <b><u>B0891</u></b>  <b><u>B0960</u></b>  <b><u>B0981</u></b>  <b><u>B0999</u></b>  <b><u>B1054</u></b></p>		<p>The Executive notes the issues raised.</p> <p>A number of submissions raise the issue that Build to Rent should be omitted as a separate use class and reference the fact that the Apartment Guidelines state that the Department may give consideration to “<i>establishing build-to-rent projects as a specific use class under the Planning and Development Regulations, 2001 (as amended)</i>”, thus indicating that at present they are not a separate use class. The Executive were aware of this when preparing the Draft but considered a standalone reference in the tables in Chapter 13 provided clarity and avoided confusion for both applicants and third parties. However, to address the issue raised, it is recommended that Build to Rent be subsumed back into residential, and that the tables be amended to indicate the areas where ‘<i>Residential - Build to Rent</i>’, is considered suitable. This approach whereby the Planning Authority gives clear guidance on where Build to Rent is appropriate is consistent with the Guidelines which state that, “<i>The promotion of BTR development by planning authorities is therefore strongly merited through specific BTR planning and design policies and standards</i>”.</p> <p>In Section 4.3.2.3 of the Draft Plan, Policy Objective PHP27: Build-to Rent and Shared Accommodation states that, “<i>It is a Policy Objective to facilitate the provision of Build-to-Rent and Shared Accommodation in suitable locations across the County</i>”.</p> <p>The Draft Plan provides that Build to Rent is ‘permitted in principle’ under the following land use zoning objectives – ‘DC’, ‘MTC’ and ‘open for consideration’ under the following land use zonings – ‘A’, ‘A1’, ‘A2’ and ‘NC’ (subject to retaining an appropriate mix of uses).</p> <p>The Executive would not support the argument that Build to Rent should be ‘permitted in principle’ on lands subject to the ‘NC’, ‘A’, ‘A1’, and ‘A2’ land use zoning objectives, as allowing the use to be ‘open for consideration’ ensures that the Planning Authority can assess how the proposed Build to rent scheme would be compatible with the overall policies and objectives for the zone. To allow Build to Rent to be ‘permitted’ in all land use zonings, which would</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>include ‘high amenity’, ‘open space’, ‘agricultural’ and ‘green belt’ zonings, would simply not be in accordance with proper planning and sustainable development.</p> <p>Since the preparation of the Draft Plan the Department of Housing, Local Government and Heritage have issued updated Apartment Guidelines to give effect to restrictions on ‘Co-Living Development’. The updated guidelines now include a different Specific Planning Policy Requirement (SPPR) for a presumption against granting planning permission for co-living/shared accommodation development, and replace the previous, 2018 version of the Guidelines.</p> <p>The Specific Planning Policy Requirement 9 states as follows:  <i>“There shall be a presumption against granting planning permission for shared accommodation/co-living development unless the proposed development is either:-</i>  <i>(i) required to meet specific demand identified by a local planning authority further to a Housing Need and Demand Assessment (HNDA) process; or,</i>  <i>(ii) on the date of publication of these updated Guidelines, a valid planning application to a planning authority, appeal to An Bord Pleanála, or strategic housing development (SHD) planning application to An Bord Pleanála, in which case the application or appeal may be determined on its merits”.</i></p> <p>Both the Written Statement and the Appendices of the Draft Plan need to be amended on foot of the new guidance.</p> <p><b>Recommendation (See also section 3.4 above)</b>  Amend Table 13.1.2 as follows:  <i>Add the following in front of Build to Rent</i>  <i>“Residential – “</i>  Amend Table 13.1.3 as follows:  <i>Add the following in front of Build to Rent</i>  <i>“Residential – “</i>  Amend Table 13.1.10 as follows:  <i>Add the following in front of Build to Rent</i>  <i>“Residential – “</i>  Amend Table 13.1.11 as follows:</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><i>Add the following in front of Build to Rent “Residential – “</i></p> <p><i>Amend Table 13.1.12 as follows:</i></p> <p><i>Add the following in front of Build to Rent<sup>a</sup> “Residential – “</i></p> <p><i>Amend Table 13.1.15 as follows:</i></p> <p><i>Add the following in front of Build to Rent “Residential – “</i></p> <p><i>Amend Table 13.1.3</i></p> <p><i>Omit “Shared Living”</i></p> <p><i>Amend Table 13.1.10</i></p> <p><i>Omit “Shared Accommodation”</i></p> <p><i>Amend Table 13.1.11</i></p> <p><i>Omit “Shared Accommodation”</i></p> <p><i>Amend Appendix 2 as follows</i></p> <p><i>Amend section 2.9.1.1 Circumstances Where A ‘Reduced Element’ May Be Acceptable</i></p> <p><i>Omit the following:</i></p> <p><i>First paragraph, omit 4<sup>th</sup> bullet point.</i></p> <p><i><u>shared accommodation developments.</u></i></p> <p><i>Omit the following:</i></p> <p><i><u>“Shared Accommodation Developments (In accordance with the Section 28 Guidelines):</u></i></p> <p><i><u>Shared Accommodation projects are professionally managed rental accommodation arranged around individual rooms, rather than apartment units, within an overall development that includes access to shared or communal facilities and amenities dedicated for use by residents only.</u></i></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><u>Due to the distinct nature and features of Shared Accommodation type development, it is only appropriate where responding to an identified urban housing need at particular locations.</u></p> <p><u>In this regard the obligation is on the proposer of a shared accommodation scheme to demonstrate to the planning authority that their proposal is based on accommodation need and to provide a satisfactory evidential base accordingly.</u></p> <p><u>Shared accommodation units are not normally subject to Part V requirements on the basis such developments would not be suitable for social housing given that they are not provided as individual self-contained residential units. In light of this, Part V requirements will not apply in the case of shared accommodation units.”</u></p> <p>Amend 2.9.3 Relevant Draft Development Plan Polices from:</p> <p><i>“Policy Objective PHP27: Build-to-Rent and Shared Accommodation It is a Policy Objective to facilitate the provision of Build-to-Rent and Shared Accommodation in suitable locations across the County and accord with the provisions of ‘Sustainable Urban Housing: Design Standards for New Apartments’, 2018 (and any amendment thereof). Proliferation of these housing types should be avoided in any one area”.</i></p> <p>To:</p> <p><i>“Policy Objective PHP27: Build-to Rent and Shared Accommodation It is a Policy Objective to facilitate the provision of Build-to-Rent <del>and Shared Accommodation</del> in suitable locations across the County and accord with the provisions of ‘Sustainable Urban Housing: Design Standards for New Apartments’, 2020 (and any amendment thereof). Proliferation of <del>these housing types</del> Built to rent should be avoided in any one area. <u>There shall be a presumption against granting planning permission for shared accommodation/co-living development.”</u></i></p> <p>Amend Section 2.8.1 Housing Demand as follows:</p> <p>Insert a new section after 2.9.2 (p 96) as follows:</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p><u><i>SPPR 9 of the 2020 Apartment Guidelines (December 2020) specifies that “There shall be a presumption against granting planning permission for shared accommodation/co-living development unless the proposed development is either:-</i></u></p> <p><u><i>(i) required to meet specific demand identified by a local planning authority further to a Housing Need and Demand Assessment (HNDA) process;</i></u></p> <p><u><i>or,</i></u></p> <p><u><i>(ii) on the date of publication of these updated Guidelines, a valid planning application to a planning authority, appeal to An Bord Pleanála, or strategic housing development (SHD) planning application to An Bord Pleanála, in which case the application or appeal may be determined on its merits”.</i></u></p> <p><u><i>No details are set out in the guidelines or in the accompanying ministerial circular as to what that specific demand would entail. The guidelines note that “Given that this form of accommodation remains new and unproven, the Department will continue to monitor the emerging shared accommodation/co-living sector and in particular the delivery of any permitted developments and may issue further additional technical updates to this document as appropriate”.</i></u></p> <p><u><i>A report on co living prepared by the DEHLGH in October 2020, references the fact that the “ cohort of people at whom co-living is targeted, are typically those at a stage of life where they have yet to accumulate significant possessions and have a shorter-term outlook with regard to choice of tenure i.e. they are not seeking to settle-down on a long-term basis.” and references the fact that examples of purpose-built co-living accommodation that have been developed elsewhere, tend to be “centrally or near-centrally located in large cities that are centres of business and creativity.” UK examples in the city of London are cited where the average age of those inhabiting the co living space is 29- 30.</i></u></p> <p><u><i>Whilst the Housing Strategy and HNDA has shown that there is clear demand for housing in the County, household sizes actually increased slightly in the County in the intercensal period 2011 – 2016 (it is assumed that they will follow overall national demographic trends and reduce). In terms of age profile the County has a greater proportion of people over 65 than in County Dublin, the EMRA region or in the State. The County has a smaller proportion of children in the 0-4 years age group than in all areas except for in Dublin City Council, but there was a significant increase between 2011 and 2016 in the number of children under the age of 5</i></u></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><u>years old in comparison with the level of the state. Numbers in the 20 – 39 age bracket, which based on overseas experience would be the age bracket most likely to avail of shared living fell between 2011 and 2016, and whilst it could be argued that the number fell due to lack of suitable accommodation the planning authority do not consider that the HNDA brings forward any specific demand for shared living which requires to be met. There is also one scheme currently under construction in the town of Dún Laoghaire.</u></p> <p>Amend Appendix 3: Development Management Thresholds as follows:</p> <p>Omit Section 12.3.7 ‘Shared Accommodation’ from thresholds table.</p> <p>Amend Appendix 14 Statement Demonstrating Compliance with Section 28 Guidelines as follows:</p> <p>Table 1:</p> <p>From:  “DHPLG (2018) Sustainable Urban Housing, Design Standards for New Apartments: Guidelines for Planning Authorities”</p> <p>To:  DHPLG (201820) Sustainable Urban Housing, Design Standards for New Apartments: Guidelines for Planning Authorities</p> <p>Omit the following on page 368:</p> <p><u>“SPPR 9: Shared Accommodation may be provided and shall be subject to the requirements of SPPRs 7 (as per BTR). In addition, (i) No restrictions on dwelling mix shall apply; (ii) The overall unit, floor area and bedroom floorspace requirements of Appendix 1 of these Guidelines shall not apply and are replaced by Tables 5a and 5b; (iii) Flexibility shall be applied in relation to the provision of all storage and amenity space as set out in Appendix 1, on the basis of the provision of alternative, compensatory communal support facilities and amenities. The obligation will be on the project proposer to demonstrate the overall quality of the facilities</u></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><del><i>provided and that residents will enjoy an enhanced overall standard of amenity; (iv) A default policy of minimal car parking provision shall apply on the basis of shared accommodation development being more suitable for central locations and/or proximity to public transport services. The requirement for shared accommodation to have a strong central management regime is intended to contribute to the capacity to establish and operate shared mobility measures.”</i></del></p> <p>Replace with:</p> <p><i>“Specific Planning Policy Requirement 9 There shall be a presumption against granting planning permission for shared accommodation/co-living development unless the proposed development is either:- (i) required to meet specific demand identified by a local planning authority further to a Housing Need and Demand Assessment (HNDA) process; or, (ii) on the date of publication of these updated Guidelines, a valid planning application to a planning authority, appeal to An Bord Pleanála, or strategic housing development (SHD) planning application to An Bord Pleanála, in which case the application or appeal may be determined on its merits”.</i></p> <p>Omit:</p> <p><del><i>“Section 12.3.7 sets out requirements in relation to Shared Living. This complies with SPPR 9”</i></del></p> <p>Replace with:</p> <p><i>“Section 4.2.3.2 sets out policy in relation to Shared Living. This complies with SPPR 9”</i></p> <p>Amend Chapter 13 Definitions, (pg.315) from:</p> <p><i>“Build to Rent”.</i></p> <p>To:</p> <p><i>“Residential – Build to Rent”.</i></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>ii) Submission requests that DLRCC include provisions for both An Post Retail and An Post Mails &amp; Parcels operations as permissible or open for consideration land uses across all zoning objectives in the County Development Plan.</p> <p>As part of their overall consolidation and optimisation strategy, An Post may consider the potential to redevelop sites which are no longer fit for purpose and may consider the potential to relocate to new sites that are considered better suited to meet the operational requirements of An Post. Request that DLRCC provide flexibility under their land use zonings and objectives in relation to An Post’s facilities and operational requirements.</p>	<p><b><u>B0950</u></b></p>		<p>The Executive notes and welcomes the submission from An Post, however “<i>An Post Retail and An Post Mails &amp; Parcels operations</i>” are not defined as specific use classes.</p> <p>Shops local, shop district and warehousing, which would cover both the retail and logistics/distribution functions of An Post are both ‘permitted in principle’ and ‘open for consideration’ in a number of zoning objectives.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submission considers that zoning mitigates against multiple uses and has very little spatial or architectural content</p>	<p><b><u>B1191</u></b></p>		<p>The Executive notes the issues raised.</p> <p>The submission considers that a more granular approach should be used in County Development Plan instead of utilising zoning. The Executive would not concur that zoning militates against mixed use. It is respectfully considered that zoning must be included in a County Development Plan in order to meet the statutory requirement for Part 10 of the Planning and Development Act, 2000 (as amended), which states that “<i>a development plan shall include objectives for— the zoning of land for the use solely or primarily of particular areas for particular purposes (whether residential, commercial, industrial, agricultural, recreational, as open space or otherwise, or a mixture of those uses), where and to such extent as the proper planning and sustainable development of the area, in the opinion of the planning authority, requires the uses to be indicated</i>”.</p> <p>Local Area Plans are the appropriate location for the more granular detail requested.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Submission requests that INST is recognised as a standalone zoning objective in Table 13.1.1.</p>	<p><b><u>B0529</u></b> <b><u>B1134</u></b></p>		<p>The Executive notes the issues raised.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>In order to protect and/or improve existing ‘social infrastructure’ (that being education, health and community/social facilities/uses and their associated land parcels / amenity space), the Draft Plan has introduced a new land use zoning objective ‘Sustainable Neighbourhood Infrastructure’, which has been applied to all existing facilities and their lands. It is not considered that there is a requirement for a new INST zoning objective.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>v) Submissions request that further urban sprawl up into the Kiltiernan and Ballycorus hills is prevented by protecting high amenity upland areas and allowing for no further rezonings. Green spaces have been particularly important during lockdown.</p>	<p><b><u>B0122</u></b> <b><u>B0733</u></b> <b><u>B1149</u></b></p>		<p>The Executive notes the issues raised.</p> <p>No significant new rezoning is proposed in the Draft Plan in the Kiltiernan or Ballycorus areas.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p><b>3.13.2: Table 13.1.2 – Zoning Objective ‘A’</b></p>			
<p>i) Submissions:</p> <ul style="list-style-type: none"> <li>● Raise concerns in relation to a subtle but significant change to the wording of zoning objective with addition of “To provide residential development”.</li> <li>● Considers this change highlights the misleading direction / misdirection the previous zoning description provided to citizens.</li> <li>● Requests advise as to whether planning consents provided by the Council or in the Council area by An Bord Pleanála over the period of the current plan can be determined to be unlawful and that any developments not yet under construction be prevented until the issue is closed legally.</li> <li>● Development land should be differentiated.</li> </ul>	<p><b><u>B0428</u></b> <b><u>B0538</u></b> <b><u>B1019</u></b> <b><u>B1096</u></b></p>		<p>The Executive notes the issues raised.</p> <p>Under the current 2016 Plan the definition of land use zoning objective ‘A’ is, “<i>To protect and/or improve residential amenity</i>”. In the Draft Plan the definition of land use zoning objective ‘A’ is “<i>To provide residential development and/or protect and improve residential amenity.</i>”</p> <p>The change to the definition of the land use zoning objective ‘A’ to include the addition of the words “<i>To provide residential development</i>” was made to accurately reflect the fact that the land use zoning objective covers areas where residential development exists and also where future residential development will take place. The issue had been raised at an oral hearing for a residential scheme on lands subject to the ‘A’ land use zoning objective, and it was considered appropriate to address the matter when reviewing the County Development Plan. It is considered that the proposed wording could be further refined to adequately ensure it covers both provision of residential development, whilst also protecting existing and future residential amenity.</p> <p>It is not the function of the Chief Executive’s Report to provide legal advice to a third party on whether to challenge any decision of the Planning Authority. In accordance with Section 50 of</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>the Planning and Development Act, 2000 (as amended), any person with sufficient interest can seek a judicial review of a decision of the Planning Authority or An Bord Pleanála.</p> <p>It would not be practical or appropriate for the Planning Authority to differentiate between “development land” and “non development land” as the decision as to whether a site comes forward for development rests with the owner.</p> <p><b>Recommendation</b> Amend Table 13.1.1 Development Plan Zoning Objectives, pg. 304 as follows</p> <p>From <i>“To provide residential development and/or protect and improve residential amenity.”</i></p> <p>to <i>“To provide residential development and/or <del>protect and</del> improve residential amenity <u>while protecting the existing residential amenities</u>”.</i></p> <p>Amend Table 13.1.2 ZONING OBJECTIVE ‘A (pg. 305) as follows:</p> <p>From <i>“To provide residential development and/or protect and improve residential amenity”.</i></p> <p>To: <i>“To provide residential development and/or protect and improve residential amenity <u>while protecting the existing residential amenities</u>”.</i></p>
<p>ii) Submission considers that where Protected Structures on the map are surrounded by ‘Zone A’ the areas within the curtilage should be marked as protected.</p>	<p><b>B1096</b></p>		<p>The Executive notes the issue raised.</p> <p>The definition of Protected Structure from the Planning and Development Act, 2000 (as amended) as set out in Section 11.4.1 of the Draft Plan is clear that it includes buildings and curtilage, “A Protected Structure, unless otherwise stated, includes the interior of the structure, the land lying within the curtilage of the structure, any other structures lying within that</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><i>curtilage and their interior and all fixtures and features which form part of the interior or exterior of that structure”.</i></p> <p>It is not, however, possible at the scale of County Development Plan maps to show curtilage.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>iii) Submission requests that a caveat be added to “offices less than 200sq m” in land use Objective A as follows: <i>‘Greater quantum of office floorspace may be considered in respect of former institutional buildings where the Institutional Objective applies and will not have adverse effects on the ‘A’ zoning objective, ‘to provide residential development and/or protect and improve residential amenity’.</i></p>	<p><b>B1043</b></p>		<p>The Executive notes the issue raised.</p> <p>The Executive would have a concern in allowing offices greater than 200 sq. metres in all former institutional buildings where the institutional objective applies as the primary objective of the land use zoning is to provide for residential development and/or protect and improve residential amenity. This submission, however, relates specifically to the Central Mental Hospital and the need for sensitive reuse of the hospital buildings which have been added to the record of Protected Structures. It is the view of the Conservation Officer that the layout and design of the proposed Protected Structures lend themselves more easily and with less intervention, to conversion to office rather than residential. It is considered that an SLO could be applied to the former institutional buildings on this site to allow office development in excess of 200 sq. metres without undermining the zoning objective on the overall site. However, the suitability of the building for other uses that are ‘permitted in principle’ and/or ‘open for consideration’ in the zoning objective should also be explored and discounted prior to proposing offices in excess of 200 sq. metres.</p> <p><b>Recommendation</b> Amend Table 13.1.2 (pg.305) as follows: Add to ‘open for consideration’, <u>“Offices in excess of 200 sq mc</u> <u>C Only applies to A zoned lands subject to SLO (insert SLO no.)”.</u></p> <p>Amend Chapter 14, Map 1, pg.319 as follows: Add a new SLO:  <u>“To allow offices in excess of 200 sq. metres in the former Central Mental Hospital buildings which are included on the Record of Protected Structures. Any application for offices in excess</u></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><i>of 200 sq. metres shall (i)relate only to the former Mental Hospital Buildings with any extension to the building in office use to be only small ancillary structures, (ii)shall include a report that demonstrates that other suitable uses that are permitted in principle or open for consideration have been explored and that the reasons for discounting same relate to the proper planning and sustainable development of the area”.</i></p> <p><b>Insert a new SLO on Map 1 on the Central Mental Hospital Lands.</b></p>
<p>iv) Submission requests that “Ancillary Infrastructure” be added to open for consideration on lands subject to zoning objective F with the following caveat - <i>Applies only to Strategic Regeneration Sites as defined by Policy CS13 of the Core Strategy, where required to facilitate the optimal residential redevelopment of the site and its integration with the surrounding area.</i></p>	<p><b>B1043</b></p>		<p>The Executive notes the issues raised.</p> <p>The Draft Plan does not include a definition for ancillary infrastructure, and it is unclear from the submission as to what exactly ancillary infrastructure would entail. To include an undefined use in the ‘F’ land use zoning objective is not recommended.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p><b>3.13.3: Table 13.1.4 Zoning Objective ‘B’</b></p>			
<p>i) Submission requests within Table 13.1.4 and Table 13.1.5 –that Agricultural Tourism and Residential are noted.</p>	<p><b>B1168</b></p>		<p>The Executive notes the issues raised and considered that they are already adequately covered in the Draft Plan.</p> <p>Table 13.1.4 relates to land uses that are permitted in principle and open for consideration in lands subject to the objective ‘B’ land use zoning objective <i>“To protect and improve rural amenity and to provide for the development of agriculture”</i>. Residential in accordance with Council policy for residential development in rural areas is already ‘open for consideration’. Agricultural tourism is not a defined use class, but various tourism uses are either permitted in principle and open for consideration including Caravan/Camping Park-Holiday, Rural Industry-Cottage, Rural Industry-Food, Cultural Use, Hotel/ Motel, Tea Room/Café and restaurant.</p> <p>Table 13.1.5 relates to land uses that are permitted in principle and open for consideration in lands subject to the objective ‘G’ - <i>‘To protect and improve high amenity areas’</i>. Residential in accordance with Council policy for residential development in rural areas is already ‘open for consideration’. Agricultural tourism is not a defined use class, but various tourism uses are ‘open for consideration’ including Craft Centre/Craft Shop (in existing premises), Guest House (in existing premises), Hotel/Motel (in existing premises), Tea Room/Café and restaurant (in existing premises).</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.13.4: Table 13.1.5 Zoning Objective 'G'</b>			
<p>i) Submission requests a review of the wording of the "G" zoning objective so as to include local crafts/reference to intangible heritage</p>	<u><b>B0503</b></u>		<p>The Executive notes the issue raised.</p> <p>It is not considered that the wording of the 'G' land use zoning objective is the appropriate location for reference to intangible heritage. Craft Centre/Craft shop in existing premises and rural industry cottage are both 'open for consideration' in existing premises. Intangible heritage is addressed in the Draft DLR Heritage Plan 2021 – 2025.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission expresses concern in relation to commercial development that is extending into the G zoning objective (high amenity areas).</p>	<u><b>B0217</b></u>		<p>The Executive notes the issue raised.</p> <p>The 'G' zoning objective is restrictive in terms of commercial development that can take place as it acknowledges the high amenity nature of these lands.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.13.5: Table 13.1.7 Zoning Objective 'SNI'</b>			
<p>iii) Submission suggests that health, sport, leisure, or culture development at Clonkeen would be more appropriate than commercial development.</p>	<u><b>B0152</b></u>	7	<p>The Executive notes the issues raised.</p> <p>The new SNI land use zoning objective allows a variety of different uses, which are either 'permitted in principle' or 'open for consideration' and are set out in Table 13.1.7 of the Draft Plan. Healthcare, sports facility, and cultural uses are all included.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>i) Submissions relate to new SNI land use zoning objective as follows:</p> <ul style="list-style-type: none"> <li>highlighting that residential development is not permitted in principle. The submission lists 149</li> </ul>	<u><b>B0292</b></u> <u><b>B0501</b></u> <u><b>B0850</b></u>		<p>The Executive notes the issue raised.</p> <p>Support for the new land use zoning is welcomed. Residential use is 'open for consideration' in the new SNI land use zoning objective. Given the overall objective of the new zoning, which is</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>sites where the zoning has been applied and notes that landowners were not made aware of change to their land use zone.</p> <ul style="list-style-type: none"> <li>• requests that residential is 'permitted in principle' under the SNI zoning, alternatively, church and school lands should not be subject to rezoning.</li> <li>• Submission supports the land use zoning for the benefit of social and community activity.</li> </ul>			<p><i>"To protect, improve and encourage the provision of sustainable neighbourhood infrastructure"</i>, it is not considered that there is a plausible planning argument to move residential from 'open for consideration' to 'permitted in principle'.</p> <p>In relation to notifying land owners with regard to any change in land use zonings, there is no legal obligation to provide such notice, however, the Draft Plan was on display from early January 2021 to 16<sup>th</sup> April 2021, a period that was longer than the statutory requirements. Over 1200 submissions were received and many were from landowners regarding the change in zoning brought about by the introduction of the new SNI land use zoning objective.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Submission states that rezoning in the Draft Plan:</p> <ul style="list-style-type: none"> <li>• Discriminates against religious.</li> <li>• Is the only zoning of its kind in the city.</li> <li>• Queries as to how it is just to prevent housing development on available lands when there are 4500 persons on the housing list.</li> </ul>	<b><u>B1015</u></b>		<p>The Executive notes the issues raised and strongly refutes the unfounded claim that there is any discrimination against religious communities.</p> <p>The new SNI zoning includes land or buildings related to serving the needs of the local and wider community for social, educational, health, religious, recreational and leisure, cultural, and civic need and is not limited in any way to lands in the ownership of religious communities.</p> <p>The Executive would not concur that it is the only zoning of its type in the city. There are very similar zonings in other Plans. As part of the background work zoning objectives in other jurisdictions were examined. The <u>Dublin City Development Plan 2016-2022</u> contains the following land use objectives relative to institutional lands, education and community / social infrastructure:</p> <ul style="list-style-type: none"> <li>• Z1 'Sustainable Residential Neighbourhoods'.</li> <li>• Z12 'Institutional Land (Future Development Potential)'.</li> <li>• Z15 'Institutional and Community'.</li> </ul> <p>The <u>Fingal County Development Plan 2017 – 2023</u> contains the following land use objectives relative to institutional lands, education and community / social infrastructure.</p> <ul style="list-style-type: none"> <li>• Zoning Objective 'CI - Community Infrastructure' with an objective to "provide for and protect civic, religious, community, education, health care and social infrastructure."</li> </ul>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>Both the current <u>Meath County Development Plan 2013-2019</u> and <u>Draft 2020-2026 Plan</u>, contain the following land use objectives relative to institutional lands, education and community / social infrastructure.</p> <ul style="list-style-type: none"> <li>• Zoning objective 'G1 Community Infrastructure', with an "To provide for necessary community, social, and educational facilities".</li> <li>• Zoning objective A2 'New Residential' with an objective, "To provide for new residential communities with ancillary community facilities, neighbourhood facilities and employment uses as considered appropriate for the status of the centre in the Settlement Hierarchy." This objective has been altered in the Draft 2020-2026 plan to state: "To provide for new residential communities with ancillary community facilities, neighbourhood facilities as considered appropriate".</li> </ul> <p>As set out elsewhere in this report, sufficient lands are zoned to provide for housing in the County.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
v) Department of Education and Skills welcomes the new SNI zoning particularly its application to existing schools in the County as they will be critical for meeting additional educational requirements that arise due to infill development of windfall sites.	<b><u>B1066</u></b>		<p>The Executive notes and welcomes the support for the new zoning from the Department of Education and Skills.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
vi) Submissions request that the definition of SNI is amended to include residential and hotel as permitted in principle. It is noted that SNI does not include 'hotel' in its land use table.	<b><u>B1011</u></b> <b><u>B0978</u></b> <b><u>B0978</u></b>		<p>The Executive notes the issues raised.</p> <p>The new SNI zoning objective includes a variety of uses that are both permitted in principle and open for consideration.</p> <p>This new land use zoning, Objective SNI, has been applied to:</p> <ul style="list-style-type: none"> <li>• Land parcels that contain existing SNI facilities together with its associated amenity / recreational space, e.g. schools, community facilities, places of worship and their associated parish / cultural centres, health care facilities.</li> <li>• Lands zoned objective 'MH' in the current 2016-2022 plan have also been zoned Objective SNI.</li> <li>• Lands with an extant planning permission for a new SNI facility – as in the case with lands in Ballyogan where a new school has been permitted.</li> </ul>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>In the case of the subject site referenced in these submissions the wider area that was zoned ‘MH’ has been rezoned to ‘SNI’ so as to ensure the expansion of the ‘SNI’ uses can be facilitated. The purpose of a social infrastructure land use zoning objective is twofold:</p> <ul style="list-style-type: none"> <li>• To identify where social infrastructure facilities and their associated amenities are located within the County, and</li> <li>• To protect and/or improve the existing social infrastructure function of these land parcels.</li> </ul> <p>Residential is ‘open for consideration’.</p> <p>To allow hotel and residential to be ‘permitted in principle’, would in the opinion of the Executive undermine the overall zoning objective.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.13.6: Table 13.1.9 Zoning Objective ‘F’</b>			
<p>i) Submission requests that Zoning Objective ‘F’ is extended to permit the construction of a Garden of Remembrance/Columbarium.</p>	<b>B0965</b>		<p>The Executive note the issue raised.</p> <p>It is considered that a columbarium wall/remembrance garden comes in under the cemetery use, which is open for consideration in the ‘F’ zoning objective. It is noted that the is a columbarium wall in Deansgrange cemetery, which is located on lands also subject to the ‘F’ zoning objective.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission requests that ‘Crematorium’ be included as a permitted or open for consideration use under Zoning Objective B and potentially other appropriate land use zonings where cemetery is permitted or open for consideration. Submission notes that there is no reference to crematorium in policy or text, save for SLO 106 and the zoning matrix. It is considered that objectives in</p>	<b>B1064</b>		<p>The Executive notes the issue raised and notes that this issue was raised during the previous County Development Plan review.</p> <p>Crematoria are ‘open for consideration’ in the ‘F’ zoning – ‘<i>To preserve and provide for open space with ancillary active recreational amenities</i>’. This is the only land use zoning in the County where they are ‘open for consideration’. They are neither ‘open for consideration’ nor ‘permitted in principle’ in the ‘B’ zoning.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>relation to crematoria in the County should be clarified</p>			<p>The Executive agrees that there is a need for a crematorium/crematoria in the County. Specific Local Objective No. 106 on Map 14 is <i>"To support the development of a crematorium at Shanganagh Cemetery"</i>.</p> <p>The Executive disagrees with the argument that crematoria should be 'permitted in principle' in the 'B' zone (and potentially other land use zonings). There is no centralised Irish guidance relating to the optimum location of crematoria, but the UK guidance entitled <i>"The Siting and Planning of Crematoria LG1/232/36"</i>, which was updated in 2000 states that sites for crematoria should be accessible by public transport. There is more recent UK Guidance from the UK Federation of Burial and Cremation Authorities, <b>"Recommendations on the Establishment of Crematoria"</b> (January 2019), and whilst this guidance is not UK Government planning guidance, it does recognise that in the UK, <i>"There is a growing recognition that new crematoria will be built in a countryside location close to the urban fringe"</i> but <i>"The site should be reasonably accessible by public transport"</i>.</p> <p>Given that there are only four crematoria in Dublin at present (one additional one since 2016), it is likely that any new crematoria would generate a high number of trips and that a facility of this type in a more rural area would not be acceptable due to the lack of capacity of the surrounding road network and the very limited public transport accessibility to 'B' zoned lands. Visual impact of the chimney stack along with environmental impact are also considerations. Crematoria use is 'open for consideration' in the 'F' zoning. 'F' zoned lands are almost universally adjacent to or in the built-up area of the County and are already well served by public transport.</p> <p>These UK Government Guidelines were referred to by the Bord Inspector in upholding a refusal by the Council of a crematorium in the Objective 'B' zoned lands at Ballycorus (under register reference D11/0314).</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.13.7: Table 13.1.13 Zoning Objective 'E'</b>			
<p>i) Submission Suggested that Table 13.1.13 should be amended:</p> <ul style="list-style-type: none"> <li>To refer to Policy E14 not E15.</li> </ul>	<b>B0981</b>		The Executive notes the issues raised.

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<ul style="list-style-type: none"> <li>Built to rent should be open for consideration in the E zone at Carrickmines. This amendment would also avoid the creation of a direct conflict between the land use zoning objectives of the Draft Development Plan and the adopted Ballyogan and Environs Local Area Plan, which specifically identifies The Park as an appropriate location for Build to Rent development.</li> <li>BTR is permissible under the NC zoning., but not at Quadrant 3 Carrickmines where there is an SLO for a Neighbourhood Centre. Table 13.1.13 should be amended.</li> </ul>			<p>In a drafting error Table 13.1.13 incorrectly references Policy Objective E15 instead of E14. (It is noted that the new Policy Objective in Chapter 6 but forward in Section 3.6 above may alter the numbering in any event).</p> <p>The Ballyogan and Environs Local Area Plan (BELAP) which was adopted on the 1<sup>st</sup> July 2019 states that it is policy ,  <i>“To permit ‘Build to Rent’ schemes – as defined by Government Guidelines - in parts of the BELAP area with good access to transport and services, namely Glencairn North, Kilgobbin East, Kilgobbin, South, The Park Carrickmines, Old Glenamuck Road, and Racecourse South (see Figure 11.1), subject to compliance with Policy BELAP RES6”.</i></p> <p>In the intervening period since 2019 a number of Built to Rent Schemes have been permitted in the County and experience with these applications has allowed a policy approach to evolve such that the Draft Plan now contains a detailed Policy Objective PHP27, which relates to both Built to Rent and Shared Living. The thrust of that policy is to facilitate the provision of Build-to-Rent in suitable locations across the County. Notwithstanding the Policy Objectives of the BELAP, the Executive would not concur that employment zoned lands are the optimum location for residential – built to rent type developments. Having regard to the extent of the overall employment land bank, the Planning Authority considers that a restrictive approach needs to be taken to provision of any residential accommodation and that includes Residential – Built to Rent in the E zoned lands. This is in line with Policy Objective E14 of the Draft Plan, as the primary objective of the land use zoning is to provide for economic development and employment. This also accords with the Section 28 Apartment Guidelines which states that, <i>“The promotion of BTR development by planning authorities is therefore strongly merited through specific BTR planning and design policies and standards”.</i></p> <p>The 2007 Section 28 Guidelines on Development Plans are clear that the Development Plan is the parent plan in any hierarchical plan relationship. Where there is conflict between the policies of a Local Area Plan and the County Development Plan, the County Development Plan prevails.</p> <p><b>Recommendation</b>  Amend table 13.1.13 (pg. 308) as follows:  Change:</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><i>‘Policy Objective E15: Securing Employment Growth’</i>                      To:  <i>‘Policy Objective E14: Securing Employment Growth’</i></p>
<p><b>3.13.8: Table 13.1.14 Zoning Objective ‘W’</b></p>			
<p>i) Submission states that the Council and its Councillors may be requested to remove “residential” use from the classes of use “open for consideration” on lands at Bullock Harbour. Submission considers that if the Council and its Councillors were to amend the plan in an attempt to interfere with a current pending appeal on the site, such unlawful interference would be exposed to legal challenge and would, undermine the legitimacy of both the appeal process and the development-plan making process. Any suggestion to remove “residential” use from the classes of use “open for consideration” on these lands should be rejected, so that the pending planning process can conclude without unlawful interference (Site also appears on map 4).</p>	<p><b><u>B1039</u></b></p>		<p>The Executive notes the issues raised.</p> <p>The Draft Plan does not propose any changes to the uses ‘permitted in principle’ or ‘open for consideration’ on lands subject to the ‘W’ zoning objective and the Executive does not propose any changes by way of amendment.</p> <p>Section 10 (2) (a) of the Planning and Development Act, 2000 (as amended), states that <i>“a development plan shall include objectives for— the zoning of land for the use solely or primarily of particular areas for particular purposes (whether residential, commercial, industrial, agricultural, recreational, as open space or otherwise, or a mixture of those uses), where and to such extent as the proper planning and sustainable development of the area, in the opinion of the planning authority, requires the uses to be indicated”.</i></p> <p><b>Recommendation</b>                      No change to Draft Plan.</p>
<p>ii) Submissions request removal of Residential use as ‘open for consideration’ in the W zoning objective at Bullock Harbour.</p>	<p><b><u>B0426</u></b>  <b><u>B0890</u></b></p>	<p>4</p>	<p>The Executive notes the issue raised but would not concur that residential should be excluded from the ‘W’ zoning at Bullock Harbour.</p> <p>A range of uses are both ‘permitted in principle’ and ‘open for consideration’ in the water front zoning objective. Uses that are ‘open for consideration’ include residential and may be permitted, <i>“where the Planning Authority is satisfied that the proposed development would be compatible with the overall policies and objectives for the zone, would not have undesirable effects, and would otherwise be consistent with the proper planning and sustainable development of the area.”</i></p> <p>It is, therefore, through the development management process that the suitability of residential or other uses for the site would be assessed. It is also through the development management process that a site specific SFRA would address whether any uses proposed are compatible with any flooding on the site.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><b>Recommendation</b> No change to Draft Plan.</p>
<p><b>3.13.9: Sandyford Urban Framework Plan Specific Land Use Zoning Objectives.</b></p>			
<p>i) Submissions state that SUFP is unduly restrictive as the zoning overly segregates the uses.</p> <p>Zoning is too strictly segregated in specified parts of the District and is inconsistent with the vision for the majority of the District as a Mixed-Use zone.</p>	<p><b><u>B0919</u></b> <b><u>B0954</u></b></p>		<p>The Executive notes the issues raised but would not concur with the issue raised.</p> <p>As set out in the SUFP, prior to the adoption of the SUFP in 2011, development within the Plan area had been somewhat piecemeal as the majority of the area had the ‘employment’ zoning objective. This permitted a broad spectrum of land uses (from light industrial to residential), without having policies and objectives to protect and provide for the amenity needs of the different uses. The SUFP very much promotes plan led mixed use. Two mixed use zoning objectives are included for lands in the SUFP area – ‘Mixed Use Inner Core’ and ‘Mixed Use Outer Core’. Both allow a variety of uses to be considered. The SUFP also sets out how mixed use is specifically to be achieved within the SUFP Plan lands, which is by one of two ways, either by providing for a mix of uses within structures and/ or between plots or by proximity of different land use zones.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submissions state that residential development should be open for consideration in Zones 1,2,3 and 4 in the SUFP area.</p> <p>In relation to Zone 3 a particular site is put forward as suitable for residential (Site bounded by Blackthorn Road to the north, Heather Road to the west and Fern Road and industrial/commercial buildings to the south and east).</p>	<p><b><u>B0919</u></b> <b><u>B0959</u></b></p>		<p>The Executive notes the issues raised.</p> <p>The rationale for removing residential from Zones 1 and 2 (MIC and MOC) for the duration of the 2022 – 2028 County Development Plan is set out in the Draft SUFP as follows; <i>“Having regard to the strategic employment status of the SUFP area as set out in out in the RSES and the provision of sustainable neighbourhood infrastructure in the overall plan area, it is considered that sufficient residential development has been permitted in the MIC and MOC zoning objective areas so as to allow for a sustainable mix of uses. Any additional residential to be permitted over the lifetime of the 2022 – 2028 Plan should take place on the A2 land use zoning objective”</i>.</p> <p>Having regard to the identification of the area as a strategic employment location in the RSES, it is an objective of the Plan to provide for office and enterprise in Zone 3. Zone 4 relates to light industrial warehousing on the southern and western periphery of the district. Having regard to the location of Zone 4 lands, and also the carrying capacity of infrastructure in the</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>Plan area, these areas are not considered appropriate for residential development at this time.</p> <p>The Planning Authority also are conscious that development in other zones can displace existing low intensity employment uses and that locations are required for such developments. The findings of the ‘Frank Knight’ report submitted as part of a number of submissions are also telling in that they indicate that there is little industrial stock available in the Dublin market.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.13.10: Table 13.1.17 Zoning Objective ‘MIC’</b>			
<p>i) Submissions express concern with removal of residential from permitted in principle in MIC zone Requests that residential is “open for consideration” in MIC zone.</p> <p>It is considered that the claim as set out in the Draft SUFP which states “the number of apartments permitted to date in the Mixed-Use Core Areas is sufficient to provide vitality to these areas” cannot reasonably be applied to the MOC zoned area as only 2 residential schemes have been permitted in the MOC area.</p> <p>Requests that residential be included as permissible in the MOC zoning objective.</p>	<p><b><u>B0897</u></b> <b><u>B0959</u></b> <b><u>B1143</u></b> <b><u>B1144</u></b></p>		<p>The Executive notes the issues raised.</p> <p>As set out in section 2.2 of the SUFP, “Having regard to the strategic employment status of the SUFP area as set out in the RSES and the provision of sustainable neighbourhood infrastructure in the overall plan area, it is considered that sufficient residential development has been permitted in the MIC and MOC zoning objective areas so as to allow for a sustainable mix of uses. Any additional residential to be permitted over the lifetime of the 2022 – 2028 Plan should take place on the A2 land use zoning objective”.</p> <p>There are currently circa 2000 residential units in the SUFP area (June 2021), with permissions in place for a further 1000 new homes and circa 800 student units.</p> <p>The point is well made that fewer residential schemes have been permitted in the MOC area than the MIC area, however, the Planning Authority examined the mixed use area in its totality, i.e. a combined MOC and MIC area, bearing in mind the fact the area is identified as a strategic employment location in the RSES. For clarity, this point can be strengthened.</p> <p><b>Recommendation</b> <b>Amend:</b></p> <p><i>“it is considered that sufficient residential development has been permitted in the MIC and MOC zoning objective areas so as to allow for a sustainable mix of uses”.</i></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><i>To:</i></p> <p><i>“it is considered that sufficient residential development has been permitted <u>in totality, in the combined mixed use MIC and MOC zoning objective areas so as to allow for a sustainable mix of uses”.</u></i></p>
<p>ii) Submissions state that the zoning objective for matrix for MIC zoned lands should be amended to include residential as a ‘Permitted in Principle’ use.</p>	<p><b><u>B1011</u></b> <b><u>B0978</u></b></p>		<p>The Executive notes the issue raised.</p> <p>As set out in the Draft SUFF,  <i>“Having regard to the strategic employment status of the SUFF area as set out in out in the RSES and the provision of sustainable neighbourhood infrastructure in the overall plan area, it is considered that sufficient residential development has been permitted in the MIC and MOC zoning objective areas so as to allow for a sustainable mix of uses. Any additional residential to be permitted over the lifetime of the 2022 – 2028 Plan should take place on the A2 land use zoning objective”.</i></p> <p>The argument to allow residential use in the MIC zone is, therefore, not supported.</p> <p><b>Recommendation</b>                      No change to Draft Plan.</p>

### 3.14: Chapter 14 - Specific Local Objectives

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<b>3.14.1: Map 1</b>			
<p>i) Submission strongly supports Section 3.4.1.1. Policy Objective CA5 '<i>Energy performance in buildings</i>'; Section 3.2.1.3. Policy Objective CA7 '<i>Construction materials</i>', and Section 3.4.4.1 <i>Urban greening</i> (Policy Objective CA17). These principles are supported for the whole County (not just new builds) and specifically for Dundrum. Propose a new SLO on Map 1 to state that the foregoing must be fundamental to the redevelopment of the Old Shopping Centre and other buildings in Dundrum Village.</p>	<b><u>B0271</u></b>	1	<p>The Executive notes the issues raised.</p> <p>Chapter 3 sets out a range of Policy Objectives, which would apply to all development. The logic is unclear in the submission as to why a few objectives should be applied as an SLO to specific parts of Dundrum and not to everywhere else.</p> <p>Policy Objectives CA5 '<i>Energy Performance in Buildings</i>', and CA7 '<i>Construction Materials</i>', are both supporting policies where standards are set by other codes beyond planning. It is beyond the scope of the Plan to make them mandatory.</p> <p>With regard to Policy Objective CA17 '<i>Urban Greening</i>', this would be assessed through Development Management and the forthcoming LAP.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission requests a new SLO be included on Map 1 as follows: "That the Dundrum Luas Station will be significantly upgraded and that the detailed design proposals are incorporated into the Local Area Plan for Dundrum".</p>	<b><u>B0271</u></b> <b><u>B0755</u></b>	1	<p>The Executive notes the issues raised.</p> <p><b>The upgrade of Luas Stations falls outside the remit of the Local Authority and, therefore, would be an operational issue for the TII.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submissions state that the effective use of the Bypass for bus and other traffic management on Dundrum Main Street is dependent on permeability through the redeveloped old Shopping Centre.</p> <p>Submissions request a new SLO to Map 1 as follows: "Permeability through all major developments on the east side of Main Street should ensure</p>	<b><u>B0271</u></b> <b><u>B0755</u></b>	1	<p>The Executive notes the issues raised.</p> <p>The ongoing ABTA for the Dundrum area, which will inform the future Local Area Plan will address permeability among other issues. It is, therefore, not considered necessary to include a SLO in the Draft Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
pedestrian/cycle links between Main Street and the Dundrum Bypass".			
<p>iv) Various submissions request amendments to SLO 9 as follows:</p> <ul style="list-style-type: none"> <li>Request that following underlined additions: <i>'To ensure that any future redevelopment <u>in Dundrum Village, including on the old shopping centre lands, takes cognisance of the character and streetscape of the Old Main Street, and maintain where appropriate, and possible existing buildings and/or facades. Building Heights alongside Main Street must be in keeping with the original <u>relatively low-rise streetscape, in keeping with its character, scale and Candidate Architectural Conservation Area status.</u></u></i></li> <li>Request that following underlined additions: <i>"To ensure that any future redevelopment of the old shopping centre lands <u>and the lands between there and the Holy Cross Church Parochial House</u> takes cognisance of the character and streetscape of the Old Main Street, and maintain, where appropriate and possible, existing buildings and/or facades. Building Heights alongside Main Street must be sensitive to the original streetscape, in keeping with its character and Candidate Architectural Conservation Area status."</i></li> <li>Request the deletion of SLO 9 from all lands that were previously approved for demolition under the previous planning permission (D08A/0231) for Dundrum 'Phase 2'. The request does not apply to Glenville Terrace,</li> </ul>	<p><b><u>B0271</u></b>  <b><u>B0755</u></b>  <b><u>B0794</u></b>  <b><u>B1072</u></b></p>	<p>1</p>	<p>The Executive notes the issues raised.</p> <p>SLO 9 pertains to the Old Shopping Centre Lands and aims to ensure that development on the site is cognizant of the character and streetscape of the Old Main Street. It is not recommended that the words "in Dundrum Village" be added as for the purposes of the County Development Plan, Dundrum carries a Major Town Centre Zoning objective and there is no legally defined village zoning (see also section 3.7), and this would cause confusion in what is a major town centre. What is interpreted to be the village may differ from individual to individual and may be interpreted to include sites further away from Main Street. It is not recommended that the words "relatively low rise" be added as again this could be interpreted as meaning that future development alongside Main Street had to be relatively low rise which is not legally defined and could potentially prevent taller buildings. In addition, it would be in conflict with the provisions of the Section 28 Guidelines pertaining to Building Height and specifically SPPR 3.</p> <p>It is not recommended that the area between the old Shopping centre site and the Parochial house be added to the SLO as the SLO pertains to the Old Shopping Centre site and any future development of same.</p> <p>To amend SLO 9 so that all lands that contained buildings permitted to be demolished under Reg. Ref. D08A/0231 be excluded from the SLO renders the SLO completely ineffectual in terms of its stated aims as it would then only apply to Glenville Terrace, which is according to the submission proposed to be retained in any future development.</p> <p><b>Recommendation</b>  Amend SLO 9 (p.319) as follows:  <i>To ensure that any future redevelopment on the old shopping centre lands, takes cognisance of the character and streetscape of the Old Main Street, and maintain where appropriate, and possible existing buildings and/or facades. Building Heights alongside Main Street must be sensitive to the original streetscape, in keeping with its character, <u>scale and Candidate Architectural Conservation Area status.</u></i></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>which it is proposed to retain in any future application.</p>			
<p>v) Submissions request several additional SLOs relating to type of housing on sites in Dundrum:</p> <ul style="list-style-type: none"> <li>• Request an SLOs as follows:  <i>“That in the redevelopment of the Old Shopping Centre, as a Strategic Regeneration Site, a proportion of residential units, to be agreed with the Planning Authority, will provide for lifetime adaptable homes, homes built to Universal Design Standards, and Supported Accommodation and that the proportion will be set down in the forthcoming Local Area Plan”.</i></li> <li>• Requests that a SLO is applied to the CMH sites specifying that purpose built elderly accommodation is included in the development of the site.</li> </ul>	<p><b><u>B0271</u></b> <b><u>B0529</u></b></p>	<p>1</p>	<p>The Executive notes the issues raised.</p> <p>Section 12.3.3.1 Residential Size and Mix of the Draft Plan requires that <i>“Applications received in both new residential communities and within the residual built up area shall include:</i></p> <ul style="list-style-type: none"> <li>• <i>A site and/or floor plans that clearly identify proposed units that:</i></li> <li>• <i>Are designed and located having regard to the needs of older people and/or persons with a disability.</i></li> <li>• <i>Are designed having regard to the concept of lifetime adaptable and/or multigenerational homes.</i></li> <li>• <i>A statement outlining how the scheme has been designed for the needs of older people/ or persons with a disability and or lifetime homes”.</i></li> </ul> <p>This requirement relates to all sites, and it is considered that it addresses the sentiments of the proposed SLOs.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>vi) With respect to SLO 6: ‘To complete a Local Area Plan for Dundrum’ – the submission encourages the speedy development of the Local Development Plan for Dundrum, which will be critical in light of the number of significant residential and commercial development proposals for the area.</p>	<p><b><u>B1125</u></b> <b><u>B1124</u></b></p>	<p>1</p>	<p>The Executive notes the issues raised.</p> <p>In relation to the Dundrum Local Area Plan the elements that have progressed includes work on the candidate ACA and proposed ACA appraisal report. The aim is to bring both the candidate ACA and the proposed candidate ACA through to full ACA status as part of these amendments to the Draft Plan.</p> <p>Work on the Strategic Flood Risk Assessment (SFRA) for the Dundrum LAP is also progressing. This is an important element given that lands within the proposed LAP boundary are subject to flooding. The SFRA will need to be align with the SFRA which has been prepared as part of the Draft Plan.</p> <p>The third element that will feed into the Dundrum LAP is the Area Based Transport Assessment (ABTA). Consultants have been appointed and work has commenced with the aim that a Draft ABTA, which can feed into the Draft LAP, this will be available in Autumn.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>It is likely that the bringing together of all elements and final drafting of the Draft LAP will take place post adoption of the County Development Plan.</p> <p>Delivering the Draft LAP after the adoption of the County Development Plan ensures that the Draft LAP can be aligned with the more up to date policy direction of the County Development Plan 2022-2028.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>vii) With respect to SLO8, the submission requests an amendment to the SLO as follows (bold are proposed additions, strikethrough is proposed deletions):</p> <p><i>“That any future development of the old shopping centre lands, Dundrum shall provide for <b>predominantly</b> residential use and retain a range of complementary <del>non-retail</del> uses including, but not limited to – retail and non-retail neighbourhood facilities, <del>employment</del>, restaurant, leisure, entertainment, <del>cultural</del>, and community and civic uses – to supplement that already provided within Dundrum Major Town Centre”.</i></p>	<b>B1072</b>	1	<p>The Executive notes the issues raised.</p> <p>Given the Major Town Centre zoning objective which pertains to the lands, the policies and objectives as set out in the Draft Plan, which envisage Dundrum providing “<i>the full range of amenities and services expected and required by its local catchment population, including a wide range of employment, leisure, community, cultural and civic uses, as well as catering for day to day shopping need</i>”, the changes proposed by the amendment are not supported (See also Section 3.7 Towns, Villages and Retail Development).</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>viii) With respect to SLO 10, the submission requests the deletion of SLO 10 ‘<i>To retain, improve and encourage the provision of sustainable neighbourhood facilities</i>’, as it is unclear what it is intended to provide. It is considered that SLO8, which covers ‘<i>retail and non-retail neighbourhood facilities</i>’ covers this point.</p>	<b>B1072</b>	1	<p>The Executive notes the issues raised.</p> <p>In the Draft Plan sustainable neighbourhood facilities are covered by a new land use zoning objective, ‘Sustainable Neighbourhood Infrastructure’, or in the case of all the towns and villages by a new Specific Local Objective 10, which aims to secure a wealth of existing facilities and services including, but not limited to, education, community cultural, civic, recreational facilities, healthcare, and religious facilities. This is clearly set out in Section 4.2.1.1 Policy Objective PHP2: ‘Sustainable Neighbourhood Infrastructure’.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			No change to Draft Plan.
<p>ix) With respect to SLO 11, the submission requests the deletion of SLO 11, which relates to the CCCAP, on the basis that the document is not a public document and has not undergone formal public consultation.</p>	<b><u>B1072</u></b>	1	<p>The Executive notes the issue raised. Whilst the Dundrum Community, Cultural and Civic Action Plan is not a statutory document it will inform the future Local Area Plan.</p> <p><b>Recommendation</b>  Amend SLO 11 (p. 319) from:  <i>“To support the recommendations of the Dundrum Community, Cultural and Civic Action Plan”.</i>  To:  <i>“To <del>support</del> take into consideration the recommendations of the Dundrum Community, Cultural and Civic Action Plan in the preparation of the Dundrum LAP”.</i></p> <p>Amend Section 7.5.2 Dundrum bullet point 6 (p. 147) from:  <i>“The provision of appropriate community infrastructure to meet the needs of the current and future population in accordance with the recommendations of a detailed study of the broader Dundrum area”.</i></p> <p>To:  <i>“The provision of appropriate community infrastructure to meet the needs of the current and future population taking into consideration <del>in accordance with the recommendations of a detailed study of the broader Dundrum area</del> the Dundrum Community, Cultural and Civic Action Plan”.</i></p>
<p>x) Various submissions relate to SLO 114 as follows:</p> <ul style="list-style-type: none"> <li>• Owners of the Old shopping Centre site request removal or repositioning of SLO 114 from their lands.</li> <li>• Support for the provision of a Dundrum Community, Cultural and Civic centre as proposed in SLO 114.</li> <li>• Propose a new SLO for a Civic and Cultural Hub in Dundrum. This project formed the basis for a URDF application by Council.</li> </ul>	<b><u>B0794</u></b> <b><u>B0942</u></b> <b><u>B1072</u></b> <b><u>B1222</u></b> <b><u>B1158</u></b>	1	<p>The Executive notes the issues raised in particular the request to remove the SLO from the shopping Centre lands, but also notes and welcomes the support for the SLO and the facility in general. The final location of the proposed Dundrum Community, Cultural and Civic Centre will be subject to further refinement in relation to site selection. It is considered that the wording of the SLO should be amended to ensure that any future redevelopment of the Old Shopping Centre site addresses the provision of a future Dundrum Community, Cultural and Civic Centre facility.</p> <p><b>Recommendation</b>  Amend SLO 114 (p. 319) from:  <i>“To support the provision of a Dundrum Community, Cultural and Civic Centre, which integrates into a civic square/plaza area, to be located at the northern end of Dundrum town”.</i></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> <li>Support the future civic, cultural, community centre. A Suitable site needs to be found for this.</li> </ul>			<p>To:</p> <p><i><u>"To ensure any future redevelopment of the Old Shopping Centre site addresses the need for the provision of a future Dundrum Community, Cultural and Civic Centre facility".</u></i></p>
<p>xi) The submission supports Specific Local Objective 113, which relates to the Central Mental Hospital lands.</p>	<p><b><u>B1046</u></b> <b><u>B0984</u></b></p>	<p>1</p>	<p>The Executive welcomes support provided for SLO 113.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xii) Submissions suggest several new SLOs for Dundrum are requested as follows:</p> <ul style="list-style-type: none"> <li>All new developments on Main Street will facilitate the provision of a pedestrian-friendly and traffic-calmed environment along Dundrum Main Street, with particular care being paid to paving materials, modern public lighting, hard and soft landscaping, and street art. There is a particular need for improved soft landscaping along the Main Street.</li> <li>In the context of any redevelopment of the Old Dundrum Shopping Centre, that power lines on Main Street will be undergrounded.</li> <li>A redeveloped and 'greened' Dundrum should be a node/ hub in the Green Infrastructure for the West side of the County, with links to proposed green routes, waterways, and parks.</li> </ul>	<p><b><u>B0271</u></b> <b><u>B0755</u></b></p>	<p>1</p>	<p>The Executive notes the issue raised. It is considered that this level of detail is more appropriate to the forthcoming Local Area Plan and/or the Development Management process.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.14.2: Map 2</b>			
<p>i) Submissions from UCD outlines details of the Future Campus Phase 1 project and welcomes SLOs 1 and 7.</p>	<p><b><u>B1084</u></b></p>		<p>The Executive notes the issues raised and welcomes support provided for SLO 1 and SLO 7, which pertain to UCD.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
ii) Submission notes SLO21 and requests that the Council provide a swimming pool and library in the Stillorgan area.	<b><u>B0751</u></b>		<p>The Executive notes the issue raised.</p> <p>Specific Local Objective 21 states: "To support and facilitate the provision of a swimming pool, leisure facility and Library within the Stillorgan area". The following Policy Objectives are also relevant:</p> <ul style="list-style-type: none"> <li>• PHP11: 'Libraries' in Chapter 4</li> <li>• OSR9: 'Sports and Recreational Facilities' in Chapter 9.</li> </ul> <p><b>The Draft Plan is a policy document whereas the future delivery of facilities is a budgetary matter and not a County Development Plan matter..</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.14.3: Map 3</b>			
i) Submissions request SLOs be added at the sports ground on Tivoli Terrace South as follows: <ul style="list-style-type: none"> <li>• SLO to prevent future rezoning of the site.</li> <li>• SLO to allow for social housing whilst retaining its existing recreational zoning.</li> </ul>	<b><u>B0054</u></b> <b><u>B0075</u></b> <b><u>B0905</u></b>		<p>The Executive notes the issues raised.</p> <p>To attach an SLO to preclude a site from future rezoning would not accord with the legislation, which obliges the planning authority to make a Development Plan every 6 years and allows Development Plans include objectives for the zoning of land for particular purposes. There are, however, no proposals to rezone the site in this current Draft Plan.</p> <p>Residential as a land use is not permitted in land use zoning Objective F, (See also Section 3.31 Land use Mapping, Map 3).</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
ii) Submission requests that an objective for a dedicated named memorial to the RMS Leinster be located on the Carlisle Pier between the two entrances to the Carlisle Pier with appropriate planting in a landscaped setting.	<b><u>B0128</u></b>		<p>The Executive notes the issues raised.</p> <p>It is recognised that Civic Memorials offer opportunities for the Council to celebrate, honour or remember a person, group of persons or event of significance. Their provision is, however, not a County Development Plan issue and is dealt with by the Memorials Committee.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			No change to Draft Plan.
<p>iii) Submission requests either a new SLO or an amendment to an existing SLO to provide a facility that recognises Dún Laoghaire's significant role as the birthplace of specifically amateur watersports.</p>	<b><u>B0605</u></b>		<p>The Executive notes the issue raised. There are a number of detailed SLOs in the Draft Plan relating to the harbour including one relating to redevelopment of the Carlisle pier (SLO26), one relating to provision of a cultural and heritage centre (SLO 116) and one relating to the development of a National Water sports Centre Campus (SLO40). It is considered that SLO 116 could be amended to also include reference to Dún Laoghaire's historic role in development of amateur watersports.</p> <p><b>Recommendation.</b>  <b>Amend SLO 116 page 322 as follows</b>  <b>From</b>  <i>“To provide a cultural and heritage centre in the environs of the Dún Laoghaire Harbour that focusses on the unique history of emigration from the Carlisle Pier, the construction of the harbour and the celebration of the first suburban rail line. Any proposals shall be subject to Appropriate Assessment Screening in accordance with the requirements of the EU Habitats Directive and shall ensure the protection and preservation of all designated SACs, SPAs, and pNHA(s) in Dublin Bay and the surrounding area.”</i></p> <p>To:  <i>“To provide a cultural and heritage centre in the environs of the Dún Laoghaire Harbour that focusses on the unique history of emigration from the Carlisle Pier, the construction of the harbour, <b>the role of the harbour in the development of amateur watersports.</b> and the celebration of the first suburban rail line. Any proposals shall be subject to Appropriate Assessment Screening in accordance with the requirements of the EU Habitats Directive and shall ensure the protection and preservation of all designated SACs, SPAs, and pNHA(s) in Dublin Bay and the surrounding area.”</i></p>
<p>iv) Submission considers that a greater focus should be placed on improving connectivity between Dún Laoghaire Town and the Harbour and, in this regard, recommends amending SLO 25 as follows:</p>	<b><u>B0896</u></b>	3	<p>The Executive notes the issues raised.</p> <p>SLO 25 states it is an objective of the Council, <i>“To improve/upgrade access to Dún Laoghaire Harbour and lands adjacent to the West Pier at Coal Quay Bridge.”</i></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p><i>'To improve/upgrade access to and from Dún Laoghaire Harbour and lands adjacent to the West Pier at Coal Quay Bridge to Dún Laoghaire Town.'</i></p>			<p>The SLO is referring to the constraint to access to the harbour and lands adjacent to the west pier across the DART line and within the harbour at Coal Quay bridge which is only a single lane in width and hence constraining the development of the area known as the Gut and the West Pier (see Appendix 8: Interim Dún Laoghaire Urban Framework Plan page 200, which further discusses this constraint).</p> <p>The issue being raised is emphasizing more the connectivity to and from Dún Laoghaire town. The issue of improving connectivity between the harbour and Dún Laoghaire is acknowledged in the Interim Dún Laoghaire Urban Framework Plan, which includes Objective 4, to <i>"Improve physical linkages and accessibility between the Town Centre and the Waterfront"</i>.</p> <p>In addition to this, a study (Economic Plan for Dún Laoghaire Harbour) has been commissioned to make recommendations as to the future use and redevelopment of the harbour, and its full integration with the town along with a second study entitled Spatial and Economic Plan for Dún Laoghaire. Improved linkages to the seafront will form an important part of the future Local Area Plan and recommendations for appropriate linkages/physical infrastructure will be considered in this context.</p> <p>It is not proposed to alter SLOs in the Draft Plan in advance of the recommendations from the studies being considered. They may be considered in the future LAP for Dún Laoghaire.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>v) Submission considers that there is a current pedestrian safety hazard at the junction of Coal Quay and Crofton Road, where pedestrian sightlines are limited and there is inadequate safe crossing space combined with the absence of safe crossing on both sides of the junction or on the bridge itself. Therefore, the submission requests that SLO is changed to:</p> <p><i>"To upgrade pedestrian safety and crossing facilities at the access from the Coal Quay to Crofton Road by</i></p>	<p><b>B0938</b> <b>B0990</b></p>	<p>3</p>	<p>The Executive notes the issues raised.</p> <p>SLO 25 states it is an objective of the Council <i>"To improve/upgrade access to Dún Laoghaire Harbour and lands adjacent to the West Pier at Coal Quay Bridge."</i></p> <p>The purpose of the SLO has been set out above in response to the previous submission. It is noted that the pedestrian safety and traffic hazard at this specific location is too finely grained for a County Development Plan and hence is <b>not considered to be a County Development Plan issue</b>.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<i>a narrowing of the junction radii to provide more pedestrian space and safe crossing facilities on both sides of the junction".</i>			No change to Draft Plan.
<p>vi) Submissions request retention of SLO 152 of the current 2016-2022 County Development Plan, "To enhance the character, ambiance and quality of the environment, historic streetscapes and public realm of the residential streets in the areas adjoining Lower George's Street, Dún Laoghaire and in particular, the areas of early twentieth century social housing, to ensure that the public realm in this older residential area - in close proximity to the core business district of the town - is enhanced, improved and maintained to the standard provided for other residential and business districts adjoining Upper and Lower George's Street", as the heritage value of that area deserves recognition and protection and the pilot scheme proved to be successful.</p> <p>Submission objects to the replacement of SLO 152 by the proposed weakening in SLO 10.</p>	<p><b><u>B0412</u></b>  <b><u>B0510</u></b>  <b><u>B0629</u></b>  <b><u>B0905</u></b>  <b><u>B0990</u></b></p>	3	<p>The Executive notes the issues and agrees with the sentiments expressed.</p> <p>It is, however, considered that the Policy Objectives of the Draft Plan particularly Policy Objective HER21: 'Nineteenth and Twentieth Century Buildings, Estates and Features', and Policy Objective HER22: 'Protection of Historic Street Furniture and Public Realm' afford Adequate protection to these streets in Dún Laoghaire and ensure that any urban realm works that would take place would be sensitive to the particular unique character of the area.</p> <p>It is noted that Map 3 of the Draft Plan has inadvertently retained the outline of SLO 157. As this SLO has been removed from the Draft Plan, so too should the outline of the area.</p> <p>SLO 152 has not been replaced by SLO 10. SLO 10 relates to 'Sustainable Neighbourhood Infrastructure', which aims to secure a wealth of existing facilities and services in our towns including, education, community cultural, civic, recreational facilities, healthcare, and religious facilities.</p> <p><b>Recommendation</b>  Amend Map 3 of the Draft Plan to remove the outline of SLO 152 in Dún Laoghaire.</p>
<p>vii) Submissions suggest the inclusion of SLOs relating to the restoration of Clarinda Park including removal of all car parking from the square and the reinstatement of original railings with granite plinths.</p>	<p><b><u>B0524</u></b>  <b><u>B0905</u></b></p>	3	<p>The Executive notes the issues raised. Works to Clarinda Park and surrounds are a Parks and Municipal Services operational matter and <b>are not County Development Plan issues.</b></p> <p><b>Recommendation</b>  No change to Draft Plan.</p>
<p>viii) Submission requests a Specific Objective in the Development Plan that an effective Traffic Management Scheme (including parking) for the area (Sandycove/Glasthule) should be prepared by the Council in consultation with the local residents as a matter of urgency.</p>	<p><b><u>B0949</u></b></p>	3 4	<p>The Executive notes the issues raised.</p> <p><b>The issues raised are not County Development Plan issues but relate to operational issues across a range of Sections, the main ones being Parking and Traffic Management.</b></p> <p>The Council is in consultation with the residents in Sandycove with regard to these issues.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>With regard to the Coastal Mobility Route, the Council is reviewing this route with input from an independent assessment of the route.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ix) Submission requests that the following SLOs are included in the Plan:</p> <ul style="list-style-type: none"> <li>• <i>“To seek the redevelopment of St. Michael’s Pier as a centre for water sports activity allowing extensive access to the water and opening up a considerable space for public municipal events”.</i></li> <li>• <i>“Providing for the updating and revision of the extant Harbour Masterplan to take account of the harbour lands and its curtilage and to guide future development”.</i></li> <li>• <i>“To improve and upgrade public slipways and develop new larger public slipways within the harbour allowing improved access to the water at all points of tide”.</i></li> </ul>	<b><u>B0947</u></b>	3	<p>The Executive notes the issues raised.</p> <p>The Dún Laoghaire Urban Framework Plan, which forms Appendix 8 of this Draft Plan contains a detailed section on ‘The waterfront and St Michael’s Wharf’ - Section 8.5.1. This section along with Section 8.6.10, which relates to the Gut/West Pier already addresses the need to ensure that future development allows the public direct access to the water.</p> <p>The Draft Plan includes SLO 40, which states it is an objective of the Council, <i>“To support and encourage the development of a National Watersports Centre Campus, to facilitate training participation in a varied range of water sports and activities to provide a focus for national and international watersports events, subject to the finding of the future feasibility study to be carried out using funding secured under the Large Scale Sports Infrastructure Fund (LSSIF). Site appraisal and analysis of the Harbour environs to identify the optimum location(s) for such a centre to be expedited as an integral part of the forthcoming Dún Laoghaire and Environs Local Area Plan”.</i> Pending the outcome of the feasibility study referenced above it would be premature to identify a location for such a centre in the Draft Plan.</p> <p>A study (Economic Plan for Dún Laoghaire Harbour) has been commissioned to make recommendations as to the future use and redevelopment of the harbour and its full integration with the town. In addition to this a further study ‘Spatial and Economic Strategy for Dún Laoghaire Town’, has been commissioned on the future of the town. It is not proposed to integrate additional Policy Objectives into the Draft Plan in advance of the recommendations from the studies being received and considered. They can be considered in the future LAP for Dún Laoghaire.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>x) Submission consider that updating SLO 38 to state that DLR recognises the potential for the shopping</p>	<b><u>B0905</u></b>	3	<p>The Executive notes the issues raised.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>centre site to be a high-density mixed-use development, might encourage the building's redevelopment.</p>			<p>SLO 38 states that it is an objective of the Council <i>“To encourage and support the redevelopment and refurbishment of the Dún Laoghaire Shopping Centre Site - in accordance with the provisions of the Interim Dún Laoghaire Urban Framework Plan - in advance of the adoption of the Dún Laoghaire and Environs Local Area Plan (LAP)”</i>. It is considered that the Local Area Plan is the correct vehicle to tease out future uses on the site although the Major Town Centre zoning objective allows for mixed use on the site including residential (see also section 3.22)</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>xi) Submission proposes a new SLO supporting the Dún Laoghaire Greening Project. This project formed the basis for a URDF application lodged by the Council.</p>	<b>B1222</b>	3	<p>The Executive notes the issues raised.</p> <p>The Draft DLUFP was updated to take on board the new emphasis on green infrastructure in the town. It has not been branded as <i>“the Dún Laoghaire Greening Project”</i> and, therefore, it is not recommended that it be thus referenced in the Draft Plan. The objectives as set out in Section 8.8 of Appendix 8 include a new objective to <i>“Provide a network of attractive and green urban spaces and public realm to enhance the user experience while also tackling climate action to create a low carbon, climate resilient and sustainable town.”</i></p> <p>Various references to green infrastructure have also been interwoven into the Dún Laoghaire Urban Framework Plan. It is not considered that the addition of an SLO is also warranted.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>xii) In relation to SLO 26, concerning the retention and redevelopment of the Carlisle Pier, it is recommended that there should be an addendum to this SLO to read as follows: ‘The black guillemot colony nesting in the under-structure of the pier will be preserved.’</p>	<b>B1247</b>		<p>The Executive notes the issues raised but considers that the level of detail specified is too granular a level of detail for an objective in a spatial County Development Plan.</p> <p>Any proposal for redevelopment of the structures would need to address ecology and biodiversity and protected species via the planning consent process. The Council will continue to work to ensure that this species have safe and secure nesting areas in Dún Laoghaire-Rathdown.</p> <p><b>Recommendation</b> No change to Draft Plan</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<b>3.14.4: Map 4</b>			
i) Various submissions request various SLOs to address issues including traffic management, provision of toilets relocation of causal trading pitches, water quality, lack of bins, littering, antisocial behaviour, safety and access for less able-bodied users in the Sandycove area.	<u><b>B0489</b></u> <u><b>B0709</b></u> <u><b>B0753</b></u> <u><b>B0762</b></u> <u><b>B0949</b></u> <u><b>B1094</b></u>	4	<p>The Executive notes the issues raised.</p> <p>The various issues set out in the submissions including provision of a traffic management scheme, provision of toilets, littering, antisocial behaviour and relocation of causal trading pitches are operational matters <b>and are not County Development Plan issues</b>.</p> <p>This issue is also discussed above in Chapter 5. The Council is in consultation with the residents in Sandycove with regard to parking and traffic management issues.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
ii) Two submissions received in relation to Bullock Harbour SLO as follows: <ul style="list-style-type: none"> <li>Request that the SLO28 is reworded to state: <i>“that any development shall have regard to the special nature of the area in terms of the height, scale, architecture and density of built form and shall comprise commercial marine-based activity and public water-based recreational uses, and shall only comprise uses that are compatible with the flooding to which the site is subject”</i>.</li> <li>Request that SLO28 is re-worded: <i>“any development shall have regard to the special nature of the area in terms of the height, scale, architecture and density of built form and shall comprise commercial marine-based activity and public water-based recreational uses, and shall only comprise uses that are compatible with the</i></li> </ul>	<u><b>B0426</b></u> <u><b>B0890</b></u>	4	<p>The Executive notes the issue raised.</p> <p>Both submissions seek to amend SLO 28, to only allow for certain uses on the site and to specifically exclude residential use. A range of uses are both ‘permitted in principle’ and ‘open for consideration’ in the waterfront zoning objective.</p> <p>Uses that are ‘open for consideration’, include residential and may be permitted <i>“where the Planning Authority is satisfied that the proposed development would be compatible with the overall policies and objectives for the zone, would not have undesirable effects, and would otherwise be consistent with the proper planning and sustainable development of the area.”</i></p> <p>It is, therefore, through the development management process that the suitability of residential or other uses for the site would be assessed. It is also through the development management process that a site specific SFRA would address whether any uses proposed are compatible with any flooding on the site.</p> <p><b>Recommendation</b> No change to Draft Plan</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<i>flooding and overtopping to which the site is subject".</i>			
iii) Iarnrod Eireann requests a reservation on the railway tunnel corridor at Dalkey for railway purposes in the interests of railway safety.	<b><u>B0989</u></b>	4	<p>The Executive notes the issues raised which relates to concerns around development and construction works, which may include rock breaking or other high vibration works, directly over and in the vicinity of the railway tunnel at Dalkey. It is also considered that these development and construction works may have an adverse effect on the railway tunnel.</p> <p><b>Recommendation</b>  Insert a new SLO to Map 4 (page 322)  <i>"To protect the Dalkey Railway tunnel corridor for railway purposes in the interest of railway safety."</i></p> <p>Mapping: Add new SLO to Map 4 and provide a boundary for the SLO as per hatched area shown on Appendix C of submission <b><u>B0989</u></b>.</p>
<b>3.14.5: Map 5</b>			
i) Submission relates to Explorium, Blackglen Road, Sandyford and requests: <ul style="list-style-type: none"> <li>Retention and relocation of SLO 159 of the current Plan.</li> <li>Inclusion of a SLO to provide for expansion of the sports/science institutional use as an extension to the Explorium facilities.</li> </ul>	<b><u>B1052</u></b>		<p>The Executive notes the issues raised.</p> <p>Submission relates to lands on Blackglen Road. SLO 159 of the current 2016 Plan is, <i>"To facilitate suitable proposals for the use/reuse and extension of the existing sports science complex and health and fitness club facility at Blackglen Road/Ticknock Drive and to provide for suitable uses - to include uses relating to health and fitness, rehabilitation services and transitional/'step-down' care services and associated medical support services - including the provision of an appropriate level of associated short-stay accommodation on site."</i></p> <p>This SLO specifically relates to the reuse of the building, which back in 2015 was empty and idle. The step-down facility utilising the existing buildings did not go ahead. To relocate this SLO would effectively allow for a new build step down medical facility, which was not the intent of the original SLO.</p> <p>The site is located on lands subject in the Draft Plan to land use zoning objective 'F' with a stated objective, <i>"To preserve and provide for open space with ancillary active recreational amenities"</i> (see Section 3.31 for response to rezoning requests on this site).</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>Under the current 2016 Plan the lands were subject to the ‘F’ zoning objective and also the ‘MH’ zoning objective, <i>“To facilitate the provision and expansion of medical/hospital uses and services”</i>. The MH objective only applied to the physical buildings on site, which back in 2015 were empty and disused. The MH zoning along with SLO 159 of the current 2016 Plan supported the provision of a transitional step-down medical facility. As stated above, this step-down facility supported by SLO 159 did not ultimately go ahead. The new use, <i>‘Explorium, Sport and Science Centre’</i>, which is located in the buildings on the site and is welcomed by the Planning Authority, meets the definition of a leisure facility as opposed to a sports facility as defined in the Draft Plan, and would have been open for consideration as a use under the current 2016 Plan, but not under the Draft Plan.</p> <p>Any application for an extension to the current use would be considered on its own merits and the requirements of the ‘F’ land use zoning objective, that not more than 40% of the land in terms of the built form and surface car parking combined shall be developed. It is not recommended that an SLO to allow expansion of the current use is provided.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission welcomes the inclusion of SLO 3 which seeks <i>‘to encourage the retention and development of the Airfield Estate for educational, recreational, and cultural uses’</i> but requests the SLO be expanded as follows:</p> <p><i>‘To support the ongoing operation and development of Airfield Estate as a major educational, recreational, tourism, cultural and community asset, and as an exemplar of sustainable environmental and climate action initiatives. The Council will support and facilitate: temporary and occasional uses that are ancillary and complementary to the established use including events, markets, pop-ups; festivals, a cycle and pedestrian connection from Dún Laoghaire to Dundrum to integrate Airfield</i></p>	<p><b>B0790</b></p>		<p>The Executive welcomes the support provided and notes the issues raised.</p> <p>SLO 3 states that it is an objective of the Council, <i>“To encourage the retention and development of the Airfield Estate for educational, recreational and cultural uses.”</i> The lands at Airfield are subject to land use zoning objective ‘F’, with a stated objective <i>“To preserve and provide for open space with ancillary recreational amenities”</i>.</p> <p>Proposals for development are assessed under the development management process. Whilst the content of the revised SLO is welcome much of it falls outside the domain of the County Plan. For example, supporting various initiatives of the ‘Airfield Trust’ would be something that may fall under the remit of the Community or Climate Action Department. Provision of directional signage for Airfield <b>is not a County Development Plan issue</b> and the provision of a cycle and pedestrian connection from Dún Laoghaire to Dundrum to integrate Airfield Estate is a matter that would be wider than a simple SLO on Airfield. There are a number of ongoing or planned local cycle upgrades in the vicinity of Airfield. Directional signage in relation to the three proposed active travel routes is also currently being examined by the Council.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p><i>Estate and the provision of directional signage on the surrounding road network. The Council will support initiatives presented by Airfield Estate that are integral to its ongoing sustainability and its endeavours to have a positive impact on and contribution to the local and national community. The Council will also proactively support and maximise the potential contribution of the Estate to the County’s green infrastructure, biodiversity and wildlife network to enhance the Parks Master Plan Program.’</i></p>			<p><b>Recommendation</b>                      Amend SLO 3 on Map 1 (p.315) and Map 5 (p. 323) as follows:                      To encourage the retention and development of the Airfield Estate for educational, recreational, <u>tourism, cultural and community uses.</u></p>
<p><b>3.14.6: Map 6</b></p>			
<p>i) Submission requests that the following SLOs be included in the Plan for the lands at St John of Gods, Stillorgan:</p> <ul style="list-style-type: none"> <li>• <i>“To support the retention of the existing medical/hospital uses at the St John of God Hospital on Stillorgan Road and facilitate its future development including the provision of supporting facilities and complementary uses”.</i></li> <li>• <i>“To provide for residential uses on the St John of God Hospital outside of the medical/hospital campus in accordance with the zoning objective and a masterplan”.</i></li> <li>• Request that a degree of flexibility is incorporated in the provisions of the Development Plan that would allow for other uses, particularly residential on the site that are complementary to the hospital use and the context of the lands.</li> </ul>	<p><b>B0920</b></p>		<p>The Executive notes the issues raised.</p> <p>The Executive acknowledge that the zoning objective for lands where hospitals are located has altered from the current 2016 Plan where they are subject to the ‘MH’ land use zoning objective, <i>“To improve, encourage and facilitate the provision and expansion of medical hospital uses and services”</i>, to ‘SNI’ zoning objective in the Draft Plan, <i>“To protect, improve and encourage the provision of sustainable neighbourhood infrastructure”</i>.</p> <p>The sentiment of the proposed SLO to <i>“support the retention of the existing medical/hospital uses at the St John of God Hospital on Stillorgan Road and facilitate its future development”</i> is supported and it is considered that a similar SLO should be applied to all hospital facilities in the County. Indeed, an SLO is already in place for St. Michaels Dún Laoghaire (SLO 32) and for the two hospital campuses in the SUIFP area, namely the Beacon and Leopardstown Park. There have been requests for similar SLOs for other hospitals including the National Rehabilitation Hospital.</p> <p>The lands are subject to the new SNI zoning objective where a variety of uses are both ‘permitted in principle’ and ‘open for consideration’. The new land use zoning objective has been applied to land parcels that contains one or more of educational, health, community / social uses or facilities. The purpose of a social infrastructure land use zoning objective is twofold:</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<ul style="list-style-type: none"> <li>• to identify where social infrastructure facilities and their associated amenities are located within the County, and.</li> <li>• to protect and/or improve the existing social infrastructure function of these land parcels.</li> <li>•</li> </ul> <p>To attach an SLO for residential development on a site zoned SNI would undermine the overarching zoning objective and is not supported.</p> <p><b>Recommendation</b> Update maps and Chapter 13 as follows:</p> <p>Add a new SLO to Maps 2 and 6 as follows: <i><u>“To support the retention of the existing medical/hospital uses at the St John of God Hospital on Stillorgan Road and facilitate its future development including the provision of supporting facilities”</u></i></p> <p>Add a new SLO to Map 2 as follows: <i><u>“To support the retention of the existing medical/hospital uses at the Blackrock Clinic and facilitate its future development including the provision of supporting facilities”.</u></i></p> <p>Add a new SLO to Map 10 as follows: <i><u>“To support the retention of the existing medical/hospital uses at St Columcille’s Hospital, Loughlinstown and facilitate its future development including the provision of supporting facilities”.</u></i></p>
<p>ii) Submission recommends that the location of SLO 57 regarding a civic park in the SUFP area is changed. Bracken Road location may be more suitable.</p>	<p><b><u>B0919</u></b> <b><u>B0634</u></b></p>		<p>The Executive notes the issues raised.</p> <p>The provision of a Civic Park within Sandyford Business District was originally identified within the 2010-2016 County Development Plan. In this regard, SLO No. 100 of the 2010-2016 County Development Plan states: <i>“To provide a civic square in Sandyford Business Estate to serve as an amenity for the whole County”</i>. The SUFP - as adopted in 2011 - ensured consistency with the provisions of SLO No. 100 as originally identified within the 2010-2016 County Development Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>The identification of Open Space or 'F' zoned lands, in the SUFP - in this instance a Civic Park – was established through an extensive assessment of the existing Green Infrastructure and the requirement to plan for the needs of the proposed community (residents, visitors and employees) in terms of high-quality open space, recreation and play opportunities. During the original drafting of the SUFP – in 2009/2010 – the associated Background Papers identified the importance of providing high quality open space - within a hierarchy of open spaces - to accommodate the environmental, social and community needs of the Framework Plan area and to provide opportunities for recreation/relaxation and socialising within the business/employment and residential districts. The provision of a Civic Park at the corner of Corrig Road and Carmanhall Road was – and remains - central to the aforementioned hierarchy of open space provision.</p> <p>As proposed, it is at the heart of the mixed-use core area, adjacent to a residential area (not yet developed) and to the south of significant permitted residential development on the 'Tivway' and 'Rockbrook' sites. The 'Tivway' site has recently commenced construction.</p> <p>The current proposed location of the park fed into the public realm approach on these two applications. It will also have an important relationship with Carmanhall Road, which will have a linear greenway running from Ravens Rock Road to Carmanhall Road and widening into the Civic Park.</p> <p>The Council have recently been unsuccessful in two funding URDF applications to progress the Park.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Various submissions received in relation to SLO 85 which relates to Stillorgan reservoir as follows;</p> <ul style="list-style-type: none"> <li>• Many request that the SLO 85 be removed.</li> <li>• Concern with noise, security, safety and privacy issues arising from location of park overlooking adjoining gardens and dwellings.</li> <li>• Concern regarding illegal dumping and vermin.</li> </ul>	<p><b><u>B0107</u></b> <b><u>B0108</u></b> <b><u>B0110</u></b> <b><u>B0113</u></b> <b><u>B0115</u></b> <b><u>B0127</u></b> <b><u>B0248</u></b> <b><u>B0259</u></b></p>		<p>The Executive notes the issues raised. SLO 85 states that it is a Council objective, <i>“To secure the use of lands at Stillorgan Reservoir for Public Amenity Purposes”</i>. Objective F2 of the Draft SUFP states that <i>“It is an objective of the Council to pursue the use of the evolving reservoir site as active public open space”</i>.</p> <p>As part of the planning application for a new covered reservoir at Stillorgan, the old reservoirs are to be decommissioned and landscaped (D16A/0855). Work is currently ongoing on site. A detailed landscape Plan was submitted as part of the application. The Planning Authority had</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<ul style="list-style-type: none"> <li>Area is already well served with public parks and open space. Considers that there is a need a swimming pool instead.</li> <li>Eco-friendly wildlife meadows would help with pollinators.</li> <li>If the park proceeds it should be at street level only.</li> <li>SLO 85 unlikely to achieved within the plan period - other open space proposals should be pursued. The addition of a Kiosk building overlooking the reservoir should also be considered.</li> <li>Irish Water request the removal of SLO 85 as use of the site for amenity purposes is not compatible with maintaining the security of the site.</li> </ul>	<p><b><u>B0424</u></b>  <b><u>B0427</u></b>  <b><u>B0476</u></b>  <b><u>B0496</u></b>  <b><u>B0570</u></b>  <b><u>B0604</u></b>  <b><u>B0622</u></b>  <b><u>B0628</u></b>  <b><u>B0646</u></b>  <b><u>B0658</u></b>  <b><u>B0746</u></b>  <b><u>B0748</u></b>  <b><u>B0757</u></b>  <b><u>B0837</u></b>  <b><u>B0881</u></b>  <b><u>B0919</u></b>  <b><u>B0904</u></b>  <b><u>B1001</u></b>  <b><u>B1058</u></b>  <b><u>B1111</u></b></p>		<p>explored the use of the reservoir site for open space with Irish Water. Whilst Irish Water were and continue to be opposed to such use, the Council consider that there is potential to use a portion of the site for publicly accessible amenity purposes.</p> <p>For clarity, the area that the Council thought suitable, was not the site of the covered reservoir and it would not therefore be elevated, thus alleviating concerns that residents may have with regard to potential overlooking. The exact layout of any open space would be dealt with at detailed design stage and any concerns of both residents and Irish Water with regard to security could be overcome. The Executive considers that as long as potential remains to utilise these lands for open space the SLO should not be removed.</p> <p><b>Recommendation</b>  No change to Draft Plan.</p>
<p>iv) Two submissions received relating to SLO 63 as follows:</p> <ul style="list-style-type: none"> <li>Request that SLO 63 should be omitted from the northern parcel of land at Leopardstown Park Hospital and applied to the southern parcel.</li> <li>Request strengthening of SLO 63 by rewording it to state <i>“To improve, encourage and facilitate the provision and expansion of medical/hospital campus at Beacon and Leopardstown Hospital.”</i></li> </ul>	<p><b><u>B0843</u></b>  <b><u>B1004</u></b></p>	<p>6</p>	<p>The Executive notes the issues raised.</p> <p>SLO 63 states that it is an objective of the Council, <i>“To provide for medical/hospital campus at Beacon and Leopardstown Hospital.”</i> In line with other requests in relation to Hospitals in the County the Executive consider the strengthening of the SLO is appropriate.</p> <p>The SLO pertains to the entirety of the ‘SNI’ zoning objective in both instances so as to allow for expansion of the ‘SNI’ healthcare uses. The argument for the removal of SLO 63 from the northern portion of the lands is tied in with a request for a rezoning (see section 3.31 for detailed response). As the Executive are not proposing rezoning the removal of the SLO is not justified.</p> <p><b>Recommendation</b>  Amend SLO 63 as follows</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<i><del>“To improve, encourage and facilitate the provision and expansion of provide for medical/hospital campus at Beacon and Leopardstown Hospital” .</del></i>
<p>v) Two submissions were received in relation to SLO 51 and one submission also addresses SLO 64 as follows:</p> <p><b>SLO 51</b></p> <ul style="list-style-type: none"> <li>Request that the SLO 51 as identified on Map 6 is removed.</li> <li>Request that the text of SLO 51 is amended as follows <i>“To provide for primary and post primary education facilities at Legionaries of Christ lands”</i>.</li> <li>Request that Objective E2 is amended as follows: <i>‘It is an objective of the Council to retain a 2 no. core sites for the provision of a 2 No. primary schools (equivalent) and a 1 no. post primary school at Legionaries of Christ lands. The Council shall liaise with the Department of Education in the development of this site these site (SLO 51 Map 1).</i></li> </ul> <p><b>Alternative Amendment suggested:</b>  <i>‘To provide for primary and post primary education facilities at Legionaries of Christ lands, and at Stillorgan Industrial Estate/Benildus Avenue other appropriate lands in the Sandyford Urban Framework Plan area, if required.</i></p> <p>Or if a substantive evidence base is found for a need for schools then:</p> <ul style="list-style-type: none"> <li>Alter the text of SLO 51 in Appendix 2 ‘Specific Local Objectives’,</li> </ul>	<p><b>B0806</b> <b>B1244</b></p>		<p>The Executive notes the issues raised.</p> <p>Submissions are requesting removal, and/or amendment of a SLO pertaining to schools in the SUPF area.</p> <p>Section 10 of the Planning and Development Act, 2000 (as amended) sets out details of the content of Development Plans and states that a Development Plan shall state objectives for, <i>“the provision, or facilitation of the provision, of services for the community, including schools, creches and other education and childcare facilities”</i>.</p> <p>Various objectives are included in the Draft Plan for the provision of schools both by way of the ‘ED’ symbol as shown on the Maps and by way of Specific Local Objectives, two of which are shown on the SUPF lands. These two sites were originally identified as being required for school purposes for the future population of the SUPF area, when the SUPF was prepared back in 2011.</p> <p>The Planning and Developing Act, 2000 (as amended) states that a Planning Authority, <i>“shall take whatever measures it considered necessary to consult with the providers of energy, telecommunications, and any other relevant infrastructure and of education, health, policing and other services in order to ascertain longer term plans for the provision of infrastructure...”</i>.</p> <p>The Planning Authority liase on an ongoing basis with the Department of Education and Skills in terms of planning for schools.</p> <p>As part of the statutory consultation process on the Draft Plan, a submission has been received, on the Draft Plan from the Department of Education and Skills. This states that, <i>“The Department confirm that every school site zoned in the Draft Plan is required to meet projected educational need”</i>. The submission from the Department notes that compact growth will densify the population in existing residential areas with an existing school network and notes the significant number of extant permissions in the County.</p> <p>The SUPF area would be one such area which has several extant permissions.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<ul style="list-style-type: none"> <li>Remove SLO 51 from the Holly Avenue lands in Map 1 ‘Land Use Zoning’, and apply the objective to the entire Stillorgan Business Estate area currently zoned Objective LIW</li> <li>Replace the school and playing pitches in Drawing 11 ‘Design Principles &amp; Character Areas’ with the existing buildings on Holly Avenue.</li> </ul> <p>Arguments are put forward for the amendments as follows:</p> <ul style="list-style-type: none"> <li>The identification of new schools and specific sites should be supported by population and needs assessments. These assessments have not been undertaken.</li> <li>No evidence is provided in the Draft Plan that the Department had any involvement in identifying the site for the purpose of retaining the objective.</li> <li>The identified need for schools in the area for the period of the Draft Development Plan has been met as evidenced by recent announcements and acquisitions by the Department of Education.</li> <li>Submission considers that the retention of the SLO by DLRCC would give rise to at least five material failures to comply with DLRCC's basic statutory obligations under the Planning and Development Act 2000, several basic principles of administrative law and its obligation to vindicate constitutional property rights. It considers that any one of those failures would, of itself, render the development plan vulnerable to judicial review challenge.</li> </ul>			<p>In relation to Sandyford/Stillorgan the Department of Education in their submission make reference to the two sites in the SUIFP area and state that, <i>“The Department re affirms the need to retain both of these sites for educational use to meet the future needs of the area ”</i></p> <p>The Planning Authority would not recommend amending SLO 51 to specifically tie the SLO for education provision on the ‘Legionaries of Christ’ site to the replacement of the existing ‘St. Michael’s’ school, as whilst the submission indicates that plans are underway for replacing the school on site, and whilst replacement of the current school would be welcomed by the Planning Authority, the final requirement in relation to educational provision on the site will be a matter to be agreed with the Department of Education and may be subject to change.</p> <p>The site may also be suitable for two educational facilities. To tie the SLO to one particular school may inadvertently prevent development of additional facilities on the site. It is noted that SLO 64 refers to primary and post primary schools.</p> <p>Having regard to the response set out above which includes the need for schools and the requirements of Section 10 of the Planning and Development Act, 2000 (as amended), to remove or amend SLO 51 is not recommended. Similarly, to amend SLO 64 is not recommended.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>Submission request that SLO 51 be amended as follows:</p> <ul style="list-style-type: none"> <li>To provide for primary and post primary education facilities at Legionaries of Christ lands (which in this case involves the replacement of <u>St Michael’s House School which provides for both primary and post primary cycles</u>) and at Stillorgan Industrial Estate/Benildus Avenue.</li> <li>Amend 64 as follows; To provide for office-based employment uses in accordance with the zoning objective and a masterplan, <u>outside of the campus required the replacement of St Michael’s House School which provides for both primary and post primary cycles for primary and post primary school(s)</u>, on the lands known as the Legionaires of Christ.</li> </ul>			
<p>vi) Submission considers that SLO 73 is no longer appropriate. In the absence of a Part 8 scheme to upgrade Brennanstown Road, recent grants of permission have demonstrated that improvements can be best delivered through planning applications.</p>	<p><b>B0831</b></p>	<p>7 9</p>	<p>The Executive notes the issues raised but would not concur.</p> <p>Whilst improvement may be being delivered via individual planning applications the Executive considers there is still a requirement to carry out a Traffic Management Scheme on the Brennanstown Road (refer also to SLO73). The Traffic Management Scheme will:</p> <ul style="list-style-type: none"> <li>○ Provide improved facilities for vulnerable road users.</li> <li>○ Reduce traffic speeds and improve safety.</li> <li>○ Reduce through traffic; and,</li> <li>○ Ensure boundary treatment and landscaping solutions mitigate the impacts on the Sylvan setting of Brennanstown Road.</li> </ul> <p>In any event, the requirements of the Plan regarding the current SLO in the Plan would have informed any improvements put forward by developers by way of a planning application. It is noted that not all permitted improvements have been delivered to date.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>vii) Submission requests SLO for an area on Blackthorn Drive currently zoned LIW and occupied by car sales showrooms and other commercial uses, to be replaced by multi storey developments, so as to create streetscape, with Increased Density/Plot Ratio of 1:2 and Heights of 6-8 storeys, with a star annotated on the Zoning Map for additional heights and buildings of noticeable design with residential use as well as commercial uses as open for consideration.</p> <p>Requests an SLO for a comprehensive study as to how best to achieve a suitable redevelopment in this area and the height, plot ratio and use limitations on the site amended in light of the outcome of that study.</p>	<b>B0954</b>		<p>The Chief Executive notes the issues raised.</p> <p>The lands in question fall into Zone 4, 'Low Intensity warehousing'. As stated in the Draft SUFP "Zone 4 currently encompasses traditional low density, low rise warehouse type development located within Stillorgan Industrial Estate and along Heather/Furze/Bracken Road and areas on the southern and western periphery of Sandyford Business District. Due to their location, and also given the carrying capacity of infrastructure in the overall area, these lands lend themselves to a continuation of lower intensity employment uses such as warehousing, car showrooms, and light industrial uses".</p> <p>Given the surroundings land use zones, which are facilitating intensive brown field redevelopment, it is important that there are lands available for less intensive commercial development and employment uses. It is, therefore, not considered appropriate that an SLO to allow for intensive mixed-use development, including residential, on these lands is justified. Nor is it considered that it is necessary for the Planning Authority to carry out a comprehensive study as to how these lands should be developed, as they were assessed as part of the preparation of the SUFP.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.14.7: Map 7</b>			
<p>i) Submission request the addition of a Specific Local Objective for the setting-up of allotments and a community garden, with an emphasis on biodiversity education, on land on Johnstown Road, formerly known as Johnstown Pitch &amp; Putt.</p>	<b>B0039</b>	7	<p>The Executive notes the issues raised.</p> <p>The Council is developing a policy to encourage the setting up of community gardens at appropriate locations throughout the County. This site, however, is not in the ownership of the Council. Both allotments and community garden facilities would be 'open for consideration' in the 'F' land use zoning objective, therefore, an applicant with sufficient legal interest can apply for these uses on the lands.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>ii) Submission requests the inclusion of an objective that the layout of the R118 will make appropriate provision for access to serve the zoned residential</p>	<b>B0759</b>	7	<p>The Executive notes the issue raised.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
lands (former Beechwood Nursery) at the Graduate roundabout and a preliminary design proposal for the new layout at the Graduate roundabout be published within six months of the adoption of the new Plan and that the application to An Bord Pleanála in respect of the project is brought forward at an early stage in the lifetime of the Plan.			<p><b>It is considered that this level of detail which relates to providing access to one particular site is beyond that of a County Development Plan issue.</b> Such a matter would be teased out via the Development Management process and consultation with the transport section.</p> <p>See also response below to submission requesting the reinstatement of SLO 160 from the 2016 County Development Plan.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>iii) Submission suggests SLO 43 should be amended as follows:</p> <p><i>“To introduce fit-for-purpose pedestrian and cycle facilities in Sallynoggin that will link to adjacent neighbourhoods and village centres, and that will enable people to access retail and recreational space, educational facilities, and employment zoned areas by active transport”.</i></p>	<b>B0326</b>	7	<p>The Executive notes the issue raised.</p> <p>SLO 43 relates to the linking of the employment lands at Deansgrange with the neighbourhood centre and ‘SNI’ facilities in Deansgrange. As can be seen on Map 7, its location is adjacent to Deansgrange and not Sallynoggin. The amendment proposed is more akin to a new SLO and it would be more appropriately addressed in the future Local Area Plan.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>iv) Submission suggests the following specific SLOs should be included in the Sallynoggin area:</p> <ul style="list-style-type: none"> <li>• <i>“To introduce traffic calming measures and reduce the vehicular traffic flow through O’Rourke Park, Sallynoggin, in order to safeguard the Mountains to Metal safe walking and cycling route”.</i></li> <li>• <i>“To upgrade the green spaces in the Sallynoggin area, in a manner that maximises their potential use for recreation and exercise by children, teenagers, women, older people, and people with other mobility requirements.</i></li> <li>• To enhance biodiversity within the Sallynoggin area, through promoting wilderness areas in existing green spaces and the conversion of at</li> </ul>	<b>B0326</b>	7	<p>The Executive notes the issues raised.</p> <p>A number of the items fall outside the realm of the County Development Plan. Some may be more appropriately addressed in the future Local Area Plan.</p> <p><b>Recommendation</b> No change to Draft Plan</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
least part of the Pearse Estates lanes into green spaces with wildflower planting.			
v) Submissions request that SLO 160 from the current Plan should be reinserted into the Plan safeguarding Killiney and Glenageary roundabouts to prevent traffic grid lock, providing and ensuring safe and sustainable traffic management for the immediate locality).	<b><u>B0599</u></b> <b><u>B0800</u></b> <b><u>B1200</u></b>	7	<p>The Executive disagrees with the request to reinstate SLO No. 160 from the 2016 Plan, which states: <i>“To facilitate, support and enhance the development of the area, both roundabouts at Killiney Shopping Centre (Graduate Roundabout) and at Glenageary, be retained to ensure the proper traffic management of the area”.</i></p> <p>It should be noted that the design of traffic management measures for all junction types, including roundabouts, forms part of national traffic management guidelines, including:</p> <ul style="list-style-type: none"> <li>• National Traffic Management Guidelines,</li> <li>• National Cycle Manual,</li> <li>• National Design Manual for Roads and Bridges (DMRB),</li> <li>• National Design Manual for Urban Roads and Streets (DMURS).</li> </ul> <p>It is recognised that the Graduate and Sallynoggin Roundabouts both cater for significant traffic flows with wide entry approaches for vehicular traffic. Current National/Central Government Design Guidance (including DMURS) would preclude such a design – with wide entry approaches - in an urban setting due to movement difficulties in facilitating vulnerable road users crossing junction legs at the roundabout - in particular young and elderly pedestrians.</p> <p>In addition, limited cycle provision exists, at or through, either of the roundabouts with the route listed as a secondary route in the Greater Dublin Area Cycle Network Plan Route 13G (Dún Laoghaire to Cherrywood) and 4 separate primary routes from the DLR Cycle Network pass through these two roundabouts and in their current configuration are significant barriers to cycling.</p> <p>Submissions in Section 3.5 above have requested the redesign of both the Graduate and Glenageary Roundabouts as they are considered hostile to pedestrians and cyclists and also as they are preventing the development of a site (Beechwood Nurseries).</p> <p>Any future upgrade of the junctions would incorporate the design guidance included within the aforementioned National Guidance. In addition, any future upgrade would require a</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>comprehensive assessment on how road users would safely use the junction and a recommendation on the best junction type to achieve this. It should also be noted that the inclusion of this SLO may curtail future upgrade options “to <i>facilitate, support and enhance the development of the area</i>”, and specifically, to improve and enhance the Sallyglen Road, which is an integral component of QBC / Bus Priority Measures from Dún Laoghaire to Cherrywood, as referenced in the Cherrywood Planning Scheme.</p> <p>The Sallyglen Road and indeed both roundabouts are considered to be important components of key links from Dún Laoghaire to Cherrywood in terms of provision for all sustainable travel modes.</p> <p>The Chief Executive considers that the reinstatement of this SLO:</p> <ol style="list-style-type: none"> <li>i) Will not facilitate, support, and enhance the development of the surrounding area.</li> <li>ii) Will limit development options within the local area.</li> <li>iii) Is contrary to National/Central Government Design Standards and will not improve safety conditions for vulnerable road users.</li> <li>iv) May limit future bus priority measure options at the roundabouts.</li> <li>v) Is contrary to the specific policies relating to the development of the Sallyglen Road (Cherrywood to Dún Laoghaire Strategic Route (R118, Wyattville Road to Glenageary Roundabout) within Policy Objective T10: Walking and Cycling, T12: County Cycle Network, Policy Objective T22: Roads and Streets, Roads, specifically Table 5.3 6 Year Road Objectives/Traffic Management/Active Travel Upgrades.</li> <li>vi) Is contrary to the general policy provisions contained within Policy Objectives: <ul style="list-style-type: none"> <li>• T1: Integration of Land-Use and Transportation Policies.</li> <li>• T30: Accessibility.</li> <li>• T10: Walking and Cycling.</li> <li>• T11: Footways and Pedestrian Routes.</li> <li>• T12: County Cycle Network.</li> <li>• T22: Roads and Streets.</li> <li>• T27: Road Safety and T28: Traffic Management.</li> </ul> </li> </ol> <p>In this regard, the Executive considers reinstating SLO. No. 160 is neither warranted nor necessary.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>In formulating this response, the Executive have in accordance with section 12 (8) (b) (iii) of the Planning and Development Act, 2000 (as amended) taken account of the strategic direction received from the members at pre-draft stage to: <i>“Request the Chief Executive to ensure that the Draft Plan take into account the four core principles of a balanced approach according to DMURS (2019)”</i>. The four core principles of DMURS are connected networks, multifunctional streets, pedestrian focus, and a multidisciplinary approach.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>vi) Submission requests including the following SLO - “It is the objective of Dún Laoghaire-Rathdown County Council to actively support and facilitate the redevelopment and expansion of strategic medical-hospital uses, services and ancillary facilities at the National Rehabilitation Hospital lands”.</p>	<b>B1160</b>	7	<p>The Executive notes the issue raised.</p> <p>The Draft Plan already contains an SLO pertaining to the National Rehabilitation Hospital, but it relates to the provision of open space as part of any redevelopment. Whilst the new SNI zoning supports health facilities the Executive have no objection to a new SLO to support the redevelopment and explanation of the National Rehabilitation Hospital lands. This is similar to SLOs already in place for proposed for other hospitals in the County.</p> <p><b>Recommendation</b> Amend Chapter 13 pg 325 and Add a new SLO to Map 7 (pg. 325) as follows:</p> <p><i>“It is the objective of Dún Laoghaire-Rathdown County Council to actively support and facilitate the redevelopment and expansion of strategic medical-hospital uses, services and ancillary facilities at the National Rehabilitation Hospital lands.”</i></p>
<p>vii) With respect to SLO 68 (Linear Park) the submission requests that this should explicitly refer to protection, restoration, and enhancement of biodiversity in this important ecosystem and, should also include the Bride's Glen Stream.</p>	<b>B1155</b>		<p>The Executive notes the issue raised.</p> <p>SLO 68 states that it is an objective of the Council to create a linear park along the Loughlinstown river incorporating a pedestrian route and cycleway (greenway), which will link Cabinteely Park to the sea at Rathsallagh. It is considered that there is no explicit need to amend the SLO as biodiversity will be addressed at design stage of any proposed works to deliver on this objective.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<b>3.14.8: Map 9</b>			

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>i) The submission requests that the SLO pertaining to the lands at Quadrant 3 should recognise the suitability of the lands to provide for residential development as part of any neighbourhood centre development on the lands, to include Build to Rent development in accordance with the policies of the Ballyogan and Environs LAP.</p>	<b>B0981</b>	9	<p>The Executive notes the issues raised.</p> <p>The lands in Quadrant 3 of the Park Carrickmines, carry the objective 'E' land use zoning objective – <i>"To provide for Economic Development and employment"</i> - and all proposals for development need to be compatible with this overarching objective. The lands are, however, subject to the SLO, which allows for the provision of a neighbourhood centre. Whilst an element of residential may be acceptable in terms of providing passive supervision and a sustainable neighbourhood centre, Policy Objective E14 Securing Employment Growth of the Draft Plan is clear that <i>"The Council will apply a restrictive approach to residential development on employment zone lands"</i>.</p> <p>The proposed SLO is, therefore, not supported. See also response relating to Quadrant 3, The Park, Carrickmines set out in Section 3.13 above.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>ii) Submission requests the inclusion of a new SLO, or an amendment of SLO 61, to allow temporary vehicular access from Kilgobbin Road to enable the phased development of lands at Kilgobbin, with a provision that the temporary access would close on completion of the Clayfarm Loop Road.</p>	<b>B1082</b>	9	<p>The Executive notes the issues raised but does not concur with the proposed amendment to SLO 61 or a new SLO to allow temporary access from the Kilgobbin Road to lands in what is called the 'Kilgobbin Quarter' in the Ballyogan and Environs Local Area Plan (2019). The Kilgobbin Road retains a rural character, is quite narrow in parts and is, therefore, considered unsuitable for development access.</p> <p>Vehicular access to the Kilgobbin lands as set out in Table 4.6 and Map 12.8 of the Local Area Plan will be from the Clay Farm Loop Road. Strong permeability links for pedestrians and cyclists from the Kilgobbin quarter to Kilgobbin Road and also eastwards and beyond to the Glenamuck Road are planned for in the LAP.</p> <p>Table 4.6 of the LAP details the Clay Farm Lane Link, which will link Stepside East and the southern parts of Kilgobbin East to onward routes to Belarmine and Sandyford along the attractive laneway that currently links Clay Farm House and Kilgobbin Cottage to Kilgobbin Road.</p> <p>Table 4.6 also includes the Glenamuck Road to Kilgobbin Road Greenway a dedicated Greenway Spine traversing the Plan area from east to west. The LAP also sets out a detailed site framework for the lands.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>The Executive would not concur with the assertion in the submission that the access issue to the Kilgobbin lands arise because of the Council's failure to take in charge a section of the Clay Farm Loop Road currently completed. The Council have over the years hosted extensive engagement with the relevant parties to reach a conclusion on the Taking- in-Charge matter, and has acted in a voluntary capacity as a facilitator between two sets of private landowners. The land is in private ownership, and it is a matter for those landowners to reach agreement.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.14.9: Map 10</b>			
<p>i) Submission requests an amendment SLO 69 to read as follows (addition underlined), "To implement and develop the lands at Cherrywood in accordance with the adopted Strategic Development Zone Planning Scheme (SDZ) <u>as may be amended to take account of emerging national policy.</u>"</p>	<b><u>B1067</u></b>		<p>The Executive notes the issue raised and acknowledges that the scheme has been amended.</p> <p><b>Recommendation</b> Amend SLO 69 on Map 7 (pg. 325), Map 9, (pg 326) and Map 10, (pg. 327):</p> <p>From:</p> <p><i>"To implement and develop the lands at Cherrywood in accordance with the adopted Strategic Development Zone Planning Scheme (SDZ)".</i></p> <p>To:</p> <p><i>"To implement and develop the lands at Cherrywood in accordance with the adopted Strategic Development Zone Planning Scheme (SDZ) (as amended)".</i></p>
<p>ii) Submissions request the removal or revision to SLO 93.</p>	<p><b><u>B0602</u></b> <b><u>B0683</u></b> <b><u>B0684</u></b> <b><u>B0714</u></b> <b><u>B0728</u></b> <b><u>B0793</u></b> <b><u>B0900</u></b></p>	<p>10 14</p>	<p>The Executive notes the issues raised.</p> <p><b>Recommendation</b> See detailed response and recommendation in Section 3.10 Environmental Infrastructure.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
	<u>B0986</u> <u>B1030</u> <u>B1050</u> <u>B1118</u> <u>B1225</u>		
iii) Submission requests a new Specific Local Objective as follows:  <i>“To facilitate and encourage the provision of a range of open space and recreational facilities within the townlands of Laughanstown and Ticknick as an extension of Ticknick Park within and adjacent to the Cherrywood SDZ boundary west of the motorway corridor”</i>	<u>B1067</u>		The Executive notes the issue raised.  The lands in question are zoned both ‘Objective B’ and ‘Objective G’, where open space is ‘permitted in principle’ and sports facilities are ‘open for consideration’. Therefore, it is not considered that there is any requirement for a Specific Local Objective.  <b>Recommendation</b> No change to Draft Plan
iv) Submission requests that the following Specific Local Objectives (SLOs) should be included in the Plan: <ul style="list-style-type: none"> <li>• Upgrade of existing sports facilities in Kilbogget Park, including playing pitches and running track.</li> <li>• Progress the development of the Kilbogget shared clubhouse project from current concept design to construction, in accordance with DLR's existing Sports Strategy.</li> </ul>	<u>B0914</u>	7 10	The Executive notes the issues raised.  <b>These are not considered to be County Development Plan issues.</b>  The level of detail requested in relation to the upgrade of sports facilities in Kilbogget Park is a Parks operational matter and will be addressed in the future Kilbogget Park Masterplan. The Parks Department have reported that there is a plan to upgrade the running track in Kilbogget Park, and that the Kilbogget shared clubhouse project will be further progressed subject to any future round of ‘Large Scale Sports Infrastructure Funding’.  <b>Recommendation</b> No change to Draft Plan
v) Submission queries wording of SLO 67 as no Masterplan for Kilbogget Park in existence.	<u>B0914</u>	7 10	The Executive notes the issue raised and would concur that the wording of SLO 67 should be altered to reflect that a masterplan needs to be prepared.  <b>Recommendation</b> Amend SLO 67, Map 7 (pg.325) and Map 10 (pg. 327) from: <i>“To upgrade and improve Kilbogget Park in accordance with the approved Masterplan”.</i>  <b>To:</b>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>vi) Submission requests the inclusion of a new SLO to be attached to the lands at Clontra, Quinn’s Road, Shankill, as follows:</p> <p><i>‘To prepare a masterplan and conservation plan for the ‘Clontra’ lands, to ensure the continued use of Clontra and associated structures into the future, by providing for residential development, and associated structures, subject to the appropriate protection of the setting, fabric and character of the Protected Structure and its attendant grounds; to provide for public access and an integrated coastal walkway and cycleway within the lands in furtherance of the objective to promote the development of the National East Coast Trail Cycle Route; to provide for measures to mitigate the erosion of the coastline; to enhance the amenity, usability and attractiveness of the open and sylvan character of the lands; and to provide for sensitively designed and sited dwellings. The masterplan shall consider issues such as access, the phasing of the delivery of the residential development and access to the coastal zone as well as architectural design and the historic, visual and ecological sensitivity of the area.’</i></p>	<p><b>B0932</b></p>	<p>10</p>	<p><i>“To upgrade and improve Kilbogget Park in accordance with the <u>future approved Masterplan</u>”.</i></p> <p>The Executive disagrees with the issue raised.</p> <p>‘Clontra’ is located on lands that are zoned ‘GB’ - Greenbelt - <i>‘To protect and enhance the open nature of lands between urban areas.’</i> The existing gatehouse known as ‘Wayside’ and the main house, ‘Clontra’ are designated Protected Structures, and there is a site identified as a Recorded Monument. The site also contains a number of objectives to protect existing trees and woodland.</p> <p>It is acknowledged that the ‘GB’ land use zoning places a significant restriction on the possible land-uses within this site and that this green belt area at ‘Clontra’ is at a remove from the remaining green belt lands in the County. However, the lands are located adjacent to significant portions of ‘F’ zoned lands and in combination serve to provide as a visual relief.</p> <p>The Executive does not agree with the need to attach a SLO to allow for additional land-uses on ‘GB’ zoned lands at this location. The uses proposed, which include residential development and the submitted preliminary masterplan, indicate the development envisaged would seriously undermine the overall zoning objective.</p> <p>In addition, Quinn’s Road east of the DART line is a substandard cul-de-saced country lane providing access solely to a sports club and some six or seven individual residential properties. The road is of substandard width, has no footpaths, is unlit and is bounded along its length by parallel lines of mature deciduous trees, which add significantly to the overall semi-rural character and ambience of the area and the laneway. The Quinn’s Road laneway is reasonably heavily trafficked by pedestrians accessing both the coast and the ‘rear’ entranceway into Shanganagh Park.</p> <p>From a purely technical perspective, it should be noted that the Council’s Coastal Defence Strategy shows particularly rapid rates of coastal erosion on that section of coastline from Shanganagh to Bray. The 50-year projections show erosion impacting significantly on the subject site.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			No change to Draft Plan.
<b>3.14.10: Map 12</b>			
<p>i) Submission puts forward the argument that an SLO is needed to provide for sympathetic and sustainable tourist accommodation within the Glencullen area in the form of glamping, pods and camper van parking. The submission indicates that there are a number of landowners including the Glencullen Adventure Park who could accommodate such facilities. An SLO is requested in this regard.</p>	<b>B0892</b>	12 13	<p>The Executive notes the issues raised and acknowledges that tourism is an important part of the rural economy for the County.</p> <p>Section 12.3.14, Chapter 12 of the Draft Plan, states that caravan and camping sites “<i>will generally be permitted in rural areas zoned ‘B’ where the topography would permit their siting without injury to amenity or public health. In rural areas zoned ‘GB’ holiday caravan sites are not ‘permitted in principle’ but may be ‘open for consideration’ depending on circumstances</i>”.</p> <p>The village of Glencullen and the surrounding area is subject to land use zoning objective ‘G’, “<i>To protect and improve high amenity areas</i>”. In order to protect the rural character of the areas subject to the ‘G’ zoning objective, caravan/camping park holiday are neither ‘permitted in principle’ or ‘open for consideration’ in this zoning objective. Indeed, very few uses are ‘permitted in principle’ with many uses only ‘open for consideration’ in existing premises.</p> <p>The Executive, however, would consider that in accordance with Policy Objective E18: Rural Development, there is an argument to be made for rural enterprises once they can be balanced with the requirement to ensure protection of the rural area.</p> <p>Whilst the Executive would have concerns allowing camping/caravan facilities to be ‘open for consideration’ in the entire ‘G’ zoning objective, the Executive considers in this particular location, there is a subtle distinction to be made in that Glencullen functions as a rural village.</p> <p>There is, therefore, limited potential for the provision of a number of small-scale camping facilities to be located, without undermining the overall zoning objective, within the envelop of the Glencullen Local Area Plan boundary within 1 km walking distance to the village crossroads.</p> <p>Locating such facilities close to the village would provide for a tourism offer, which can be accessed by public transport and also allows tourists avail of services within the village. To avoid any adverse impact on the rural character and the sensitive environment of the area it is considered that provision should be limited to avoid proliferation of such accommodation.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>The scale of any such facility should also be limited to avoid a negative impact on the landscape.</p> <p>Development in the area is reliant on domestic wastewater treatment systems and there are constraints associated with watercourses and source protection areas, which may impact on potential development (see Section 10.2.2.5 of the Draft Plan).</p> <p><b>Recommendation</b> Amend Map 12 and Map 13 (pg. 328) and Chapters 13 and 14 as follows:</p> <p>Insert a new Specific Local Objective on Map 12 and Map 13:</p> <p><i><u>“To provide for a number of holiday caravan/camping facilities within a 1km radius of the cross roads at Glencullen subject to the following; ensuring that there is not an over proliferation of such facilities, ensuring any proposals do not undermine the overall zoning objective, ensuring proposals do not have a negative impact on the source protection area or sensitive watercourses as identified in the Glencullen Local Area Plan and/or in section 10.2.2.5 of this Plan and ensuring that the development (including any resultant increases in visitor numbers and/or behaviour) does not affect the integrity of the Knocksink Wood Special Area of Conservation. Each facility shall be limited to a total of 10 pitches (combination of pods, glamping, tents, camper vans) and any glamping pods shall be commensurate in size and scale to a tent/camper van so as to avoid any negative visual impact on the landscape”.</u></i></p> <p>Amend table 13.1.5 (pg. 306) as follows:</p> <p>Add Caravan/Camping park holiday*to uses open for consideration <i>*“Only in accordance with Specific Local Objective no (insert number) on Maps 12 and 13”.</i></p>
<b>3.14.11: Map 14</b>			
<p>i) Submissions request that SLO 107 be modified as follows:</p> <ul style="list-style-type: none"> <li>“To co-operate with the National Transport Authority, Transport Infrastructure Ireland and Wicklow County Council in the establishment of a combined road and public transport bridge</li> </ul>	<p><b>B0873</b> <b>B1247</b></p>	<p>14</p>	<p>The Executive notes the issues raised with regards to SLO7. SLO 7 states it is an objective of the Council, “To co-operate with the National Transport Authority, Transport Infrastructure Ireland and Wicklow County Council in the establishment of a combined road across the County Brook Valley to provide connections between the proposed new development areas of old Connaught</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p><i>across the County Brook Valley to provide connections between the proposed new development areas of old Connaught and Fassaroe (Wicklow County). The Corridor and Route Selection Process outlined by Policy T24 should be followed".</i></p> <ul style="list-style-type: none"> <li>• More appropriate that SLO 107 make a broader provision for a combined 'road and public transport bridge' in line with the provisions of the 2019 Bray and Environs Transport Study (BETS).</li> <li>• Regarding the busway from Fassaroe to Old Connaught over the County Brook at Ballyman Glen. Extreme care will have to be taken in the design and construction of this proposed bridge to avoid any detrimental impacts on this SAC and particularly on the hydrology of the petrifying springs it is designated to protect.</li> </ul>			<p><i>and Fassaroe (Wicklow County). The Corridor and Route Selection Process outlined by Policy T24 should be followed".</i></p> <p>The Bray and Environs Transport Study (BETS) 2019, which was agreed jointly by the NTA, TII, Wicklow County Council and Dún Laoghaire-Rathdown County Council refers to a 'busway from Fassaroe to Old Connaught over County Brook at Ballyman which facilitates walking and cycling' (Section 3.8) and a 'Busway and Bridge over County Brook at Ballyman Glen (Section 2.1).</p> <p>One submission recommends a rewording of SLO 7 to refer to a 'combined road and public transport' bridge at County Brook. The reason for this is that it would facilitate a busway as per the BETS, which could potentially become a LUAS bridge. It is noted that the BETS does not refer to the LUAS or a road but refers to both a busway, which facilitates walking and cycling and also to a busway and bridge. It is considered that the wording used in the Draft Plan should be amended to more closely reflect the BETS 2019.</p> <p>The other submission refers to the sensitivities of Ballyman Glen Special Area of Conservation. It is considered appropriate to amend the SLO to make specific reference to the Ballyman Glen Special Area of Conservation.</p> <p><b>Recommendation</b> Reword SLO 107 on (pg. 329) to:</p> <p><i>"To co-operate with the National Transport Authority, Transport Infrastructure Ireland and Wicklow County Council in the establishment of <del>a combined road across the County Brook Valley</del> a busway and bridge from Fassaroe to Old Connaught over County Brook at Ballyman Glen which facilitates walking and cycling to provide connections between the proposed new development areas of old Connaught and Fassaroe (Wicklow County)".</i></p>
<p>ii) Submission noted that SLO 98 is missing from north of Bray Harbour</p>	<p><b>B1223</b></p>	<p>14</p>	<p>The Executive notes and welcomes the issue raised. SLO 98 was inadvertently attributed to the text of Map 12 and not placed on Map 14.</p> <p><b>Recommendation</b> Amend Map 14 to add SLO 98.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			Remove SLO 98 from the text on Map 12 (pg. 328) and relocate to text on Map 14 (pg. 329).
iii) Submission questions the application of SLO 22 rather than rezoning Woodbrook College to SNI.	<b><u>B0261</u></b>		<p>The Executive notes and welcomes the issue raised.</p> <p>For Sustainable Neighbourhood Infrastructure facilities located in the 'F', 'B', 'GB' and/or 'G' zone, an SLO has been used to ensure their protection as the introduction of the 'SNI' zoning objective by way of a rezoning was not considered appropriate.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
iv) Submission considers that SLO 104 on the Woodbrook lands should be SLO 103.	<b><u>B0261</u></b>		<p>The Executive notes and welcomes the issue raised. SLO 103, which relates to the Woodbrook/Shanganagh Local Area Plan was inadvertently labelled 104 on the Draft Maps.</p> <p><b>Recommendation</b> Amend Map 14 (pg. 329) as follows:</p> <p>Replace SLO 104 on lands at Woodbrook with SLO 103.</p>
v) Submission requests that an SLO is added on the Old Conna Golf Club lands to state: <i>"That there shall be a buffer zone of 50 metres between any development under this Plan and the border of Old Conna Golf Club".</i>	<b><u>B0072</u></b>	14	<p>The Executive notes the issue raised but considers that no SLO is required.</p> <p>Policy Objective OSR10: Protection of Sports Grounds/Facilities of the Draft Plan already states that, <i>"Where development is proposed within ten (10) metres of such a facility/grounds, there will be an obligation on the developer to demonstrate the ameliorative measures proposed will ensure that the subject development will not interfere with the operational capacity or recreational/amenity function of the sports facility/sports grounds".</i></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
vi) Submissions: <ul style="list-style-type: none"> <li>• Welcome and support the retention of SLO 118 "The lands to facilitate and form any future extension of Shanganagh Park".</li> <li>• Requests that a Specific Local Objective (SLO) is placed on the lands bounded by N11/M1,</li> </ul>	<b><u>B0555</u></b> <b><u>B0669</u></b> <b><u>B0702</u></b> <b><u>B1155</u></b>	14	<p>The Executive does not agree with the issues raised.</p> <p>The Draft Plan contains a SLO 118 - located on the lands in question – which states <i>"The lands to facilitate and form part of any future extension of Shanganagh Park".</i></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>Dublin Road, N11/M11 slip road and Aughmore Lane/St. Joseph's, Crinken Lane and designated "to facilitate and form any future extension of Shanganagh Park".</p> <ul style="list-style-type: none"> <li>Requests that a future extension of Shanganagh Park on the western side of the R119 will be linked to Carrickgollogan and Rathmichael Wood in time.</li> </ul>			<p>It is noted that the lands subject to this submission cover a large area and are currently zoned objective 'GB' "to protect and enhance the open nature of lands between urban areas".</p> <p>The lands currently include a secondary school, Woodbrook Downs Housing development, some individual residential properties, and some commercial properties. There are no current plans to extend Shanganagh Park into this large area of privately owned land.</p> <p>However, if the Council were to purchase this land at a future date, the zoning objective does not preclude any future extension of the park. Open Space is 'permitted in principle' in zoning objective 'GB' (see Table 13.1.6).</p> <p><b>Recommendation</b> Remove SLO 118 from Map 14 and Chapter 14 (pg. 329).</p>
<p>vii) Submission suggests that the educational (ED) and institutional (INST) objectives applying to the lands to the west of the N11 (Old Connaught) should be removed as there is no existing institutional or educational use on the subject lands at present, and future requirements for additional schools in the area are more appropriately dealt with under the forthcoming LAP for the area.</p>	<b>B0928</b>	14	<p>The Executive would not agree with the issue raised.</p> <p>As set out in Chapter 4, the Draft Plan makes provision for educational facilities through the identification and reservation of potential school sites. The need for future school sites in the Old Connaught area has been identified following consultation with the Department of Education.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>viii) Submissions in respect of SLO 92 – "That no insensitive or large-scale development will take place above the 90 - metre contour line at Rathmichael, from Old Connaught Golf Course to Pucks Castle Lane" (Maps 10-14)":</p> <ul style="list-style-type: none"> <li>Consider it to be quite restrictive and requests no further restrictions and/or limitations to the objective.</li> <li>Suggests a rewording to "No building above the 90 metre contour at Rathmichael".</li> </ul>	<b>B0126</b> <b>B1003</b>	14	<p>The Executive notes the issues raised.</p> <p>The wording of the particular SLO relating to development over the 90-metre contour has changed in successive plans as earlier County Development Plans (2004-2010) stated "no development" could take place above the 90-metre contour. This was considered unreasonable and overly restrictive as there are certain sites zoned 'A' (residential) above the 90-metre contour, where infill development might be considered appropriate subject to the normal planning considerations.</p> <p>No changes are proposed to the wording in the Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<b>Recommendation</b> No change to Draft Plan.



### 3.15: Chapter 15 - Implementation, Monitoring and Evaluation

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<b>3.15.1: Introduction</b>			
i) A number of submissions acknowledge and welcome the progressive and innovative nature of the monitoring framework. The SMART approach to the formulation of Policy Objectives is commended. Proposals to prepare Progress Reports from various data sources to monitor progress on Policy Objectives is also welcomed.	<u><b>B0049</b></u> <u><b>B0319</b></u> <u><b>B0627</b></u> <u><b>B1088</b></u>		The Executive notes and welcomes the comments made.  <b>Recommendation</b> No change to Draft Plan.
<b>3.15.2: Implementation and Monitoring</b>			
i) Submits that it is not clear how the Policy Objectives in the Plan are to be achieved. Suggests the Plan should be streamlined into key priorities which could be delivered over the first half of the Plan period.	<u><b>B0022</b></u>		The Executive notes the issue raised.  The Draft County Development Plan introduces, for the first time, a framework for measuring the outcomes of Policy Objectives. The implementation and monitoring framework is set out in Section 15.5 of the Draft Plan and Policy Objectives are assessed in terms of means of implementation and also key performance indicators to monitor/evaluate delivery of the Policy Objective.  With regard to timeframes and identifying key priorities, many Policy Objectives are continual or may take a number of Plan cycles to be fully realised. In this context, the framework is intended to provide a first step towards assessing the progression towards the delivery of desired planning outcomes which, may continue through successive County Development Plans. Furthermore, it is noted that the delivery of desired planning outcomes, may be subject to a range of external factors, most notably wider economic circumstances and availability of resources, and as such the specification of a timeframe would necessitate a firm means of ensuring implementation.  In addition, it is highlighted that a key purpose of the implementation and monitoring framework is to function as a formal policy feedback loop with the evaluation and reporting processes intended to comprise a key input into the formulation and refinement of future planning policy. In this manner, the framework is intended to serve as an important evidence-

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>based input and integrate with the review process of subsequent County Development Plan’s on an ongoing basis.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.15.3: Plan Evaluation and Reporting</b>			
<p>i) Requests more regarding how the Plan will actively engage with citizens in the future - especially around environment, biodiversity and placemaking.</p>	<p><b>B0022</b></p>		<p>The Executive notes the issue raised.</p> <p>The Council recognises the importance of public engagement as the primary means of enabling citizens to influence the plans which affect their lives, and also to facilitate community ownership of the plans that shape their communities.</p> <p>The preparation and making of the Development Plan is subject to specific requirements for public engagement set out under Sections 11 and 12 of the Planning and Development Act, 2000, (as amended) and these include giving notice of the intention to review a Development Plan, the holding of public meetings, and consultation procedures to facilitate the making of submissions. Furthermore, Section 11(3)(a) of the Planning and Development Act states that “... a planning authority shall take whatever additional measures it considers necessary to consult with the general public and other interested bodies.”. In terms of the preparation of the Draft County Development Plan it is noted that the Office of the Planning Regulator, stated in their submission that ‘In terms of public consultation and engagement, the Office considers the level of public engagement activity undertaken in support of the Draft Plan to be an exemplar.’</p> <p>In terms of public engagement, post adoption of the Development Plan, it is noted that the Council regularly undertakes public engagement exercises, relating to an array of relevant strategies / projects in the County. In terms of land use planning, the Draft Plan sets out a comprehensive programme for Local Area Plans in the County (see Table 2.15, p.44) and it is highlighted that each LAP brought forward will be subject to statutory public consultation. The 2 year Progress Report relating to the County Development Plan will also be publicly available.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>ii) The public should be involved in the monitoring process and data should be made public. There should be accountability and transparency in the process around how KPIs are monitored and evaluated, with details of stakeholders involved in the review and subsequent decision-making processes.</p>	<p><b>B0627</b> <b>B0319</b></p>		<p>The Executive notes the issue raised.</p> <p>The inclusion of a stand-alone Chapter as part of the Draft County Development Plan relating to implementation, monitoring and evaluation is the first step in which the public is enabled to engage with the County Development Plan monitoring process. This new approach introduces, for the first time, greater clarity and transparency with regard to the function and purpose of the monitoring process. It is highlighted that all relevant data sources to be monitored are identified and furthermore, a significant component of which are publicly accessible.</p> <p>It is intended that the Forward Planning Department of the Council will undertake the monitoring process with the support of inter-departmental input as required. The Implementation and Monitoring Framework set out in Section 15.5 sets out clearly how this process will be undertaken.</p> <p>As stated in Section 15.3, the implementation and monitoring framework is intended to function as a formal feedback loop with the evaluation and reporting processes intended to comprise a key input into the formulation and refinement of future planning policy. In this manner, the framework is intended to serve as an important evidence-based input and integrate with the review process of subsequent County Development Plans. Policy-making as part of any future County Development Plan will be subject to statutory public consultation</p> <p>As set out in Section 15.3 of the Draft Plan, the Planning Authority has a statutory requirement to compile a 2 Year Progress Report of the County Development Plan. The legislative provisions of Section 15(2) of the Planning and Development Act, 2000, (as amended) require that the Planning Authority shall, not more than 2 years after the making of the County Development Plan, give a report to the Elected Members on the progress achieved in securing the objectives of the Plan.</p> <p>It is highlighted that the 2 Year Progress Report of the existing DLR County Development Plan 2016-2022 was both presented to the Elected Members and published on the Council’s website for public viewing. It is intended that a similar process will be undertaken as part of the 2 Year Progress Report of the new DLR County Development Plan 2022-2028.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
No change to Draft Plan.			
<b>3.15.4: Environmental Monitoring</b>			
<p>i) Plan monitoring needs to be strengthened in terms of the Strategic Environmental Assessment monitoring. A new Policy Objective should be added to address the monitoring of the significant environmental effects of implementation of the County Development Plan.</p>	<b>B0049</b>		<p>The Executive agree with the issue raised.</p> <p>Section 15.4 of the Draft Plan 'Environmental Monitoring', notes the provisions of Article 10 of the SEA Directive which requires monitoring of the significant environmental effects of the implementation of the County Development Plan in order to identify, at an early stage, unforeseen adverse effects and to enable appropriate remedial action to be undertaken. The full and comprehensive monitoring and evaluation assessment, required to be undertaken under Article 10 of the SEA Directive, is set out in the Strategic Environmental Assessment which accompanies the County Development Plan.</p> <p>The Executive considers that the insertion of a Policy Objective would appropriately reflect the Council's commitment to environmental monitoring requirements, in accordance with Article 10 of the SEA Directive, and strengthen the integration of environmental monitoring as a component part of the overarching approach to Plan implementation, monitoring and evaluation.</p> <p><b>Recommendation</b> Insert a new Policy Objective at the end of Section 15.4 as follows:</p> <p><i>'IME1: SEA Monitoring It is a Policy Objective to monitor the significant environmental effects of the implementation of the County Development Plan through the monitoring measures and reporting requirements set out in Section 10 of the SEA Environmental Report for the County Development Plan.'</i></p>
<b>3.15.5: Implementation and Monitoring Framework</b>			
<p>i) Where applicable, criteria for 'measuring progress' should be outlined for individual Policy Objectives. Highlight and promote areas where progress is being made and also examine areas where less was achieved and investigate the reasons why. Any barriers to the implementation of the Policy Objectives should be identified.</p>	<b>B0627</b>		<p>The Executive notes the issue raised.</p> <p>It is considered that the recommendations in this submission are comprehensively addressed in Chapter 15 – Implementation, Monitoring and Evaluation. Section 15.5 of the Draft Plan outlines the framework to assess Policy Objectives and identifies key performance indicators or relevant data sources to monitor/evaluate the delivery of the Policy Objective. This comprises the means for measuring progress.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>As set out in Section 15.3, the framework is intended to assist the Planning Authority in meeting its statutory reporting requirements including the 2 Year Progress Report of the County Development Plan. Furthermore, the framework is intended to function as a formal feedback loop with the evaluation and reporting processes intended to comprise a key input into the formulation and refinement of future planning policy.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.15.5.1: Core Strategy</b>			
<p>i) Ecosystem Services gains/losses should be included in the plan.</p>	<p><b>B1088</b></p>		<p>The Executive notes the issue raised.</p> <p>The purpose of Policy Objectives in the Draft Plan are wide-ranging and while every effort has been made to formulate Policy Objectives that are SMART (Specific, Measurable, Assignable, Realistic and Time-Related) it is acknowledged that not all Policy Objectives may be measured in easily identifiable quantitative values.</p> <p>As set out in Section 2.5, the Ecosystems Services Approach followed by the Plan provides a strategy for the integrated management of land, water and living resources that promotes conservation and sustainable use in an equitable way. Policy Objectives that support the Ecosystem Services Approach principles are included across a number of Chapters in the Draft Plan, most notably Chapter’s 3, 8, 9, 10, 11. The approach to monitoring the Ecosystems Approach is thus multi-faceted incorporating a range of Policy Objectives and cross-cutting themes, rather than a single defined measurable.</p> <p>It is highlighted that under Policy Objective CS8 – Ecosystem Services Approach, it is a Policy Objective to promote an Ecosystem Services Approach in the preparation of lower-level Plans, Strategies and Development Management. This Policy Objective is included in the Implementation and Monitoring Framework (Table 15.5.2) and will be monitored through the application and specific recognition of the Ecosystem Services Approach in LAP’s identified as part of the LAP plan-making programme.</p> <p>It is noted that in addition to the implementation and monitoring framework included in the Draft Plan, a full and comprehensive monitoring and evaluation assessment, required to be</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>undertaken under Article 10 of the SEA Directive, is set out in the Strategic Environmental Assessment that accompanies the County Development Plan. As noted above, it is proposed to incorporate a new Policy Objective (IME1: SEA Monitoring) to monitor the significant environmental effects of the implementation of the County Development Plan through the monitoring measures and reporting requirements set out in Section 10 of the SEA Environmental Report for the County Development Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.15.5.2: Climate Action</b>			
<p>i) Recommends an additional indicator is included which monitors the delivery of the Local Authorities Energy Renovation Strategy.</p>	<b>B1088</b>		<p>The Executive notes the issue raised. The Local Authority's Energy Renovation Strategy is monitored by the DLR Energy Team as part of the DLR Climate Change Action Plan. The DLR Climate Change Action Plan is monitored on an annual basis with a review and revision every five years. It is not considered necessary to include this indicator as part of the implementation and monitoring framework for the County Development Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) More should be done in terms of monitoring carbon emissions.</p>	<b>B1088</b>		<p>The Executive notes the issue raised.</p> <p>Section 28 Guidelines are in preparation by the Department of Housing, Local Government and Heritage which are intended to provide clarification around the area of Climate Action in the context of the Development Plan, including a suitable methodology for measuring carbon emissions. In addition, EMRA is currently leading on a research project on Greenhouse Gas Impact Assessment Method for Spatial Planning Policy titled 'Quantitative Greenhouse Gas Impact Assessment Method for Spatial Planning Policy (QGasSP)' as part of the EU ESPON (European Spatial Planning Observation Network) research programme.</p> <p>As provided under Policy Objective CA3: Measuring Greenhouse Gas Impact, the Council will quantify the GHG impacts for the County Development Plan when EMRA guidelines become available.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<b>3.15.5.3: Neighbourhood – People, Homes and Place</b>			
i) There is nothing about sustainable transport in Section 15.5.4. Objectives and measures to encourage active travel including walking and cycling, and associated infrastructure, should be prioritised.	<b><u>B0749</u></b>		The Executive notes the issue raised.  Section 15.5 of the Draft Plan sets out the implementation and monitoring framework relating to Transport and Mobility and includes multiple measures pertaining to the evaluation of sustainable transport Policy Objectives including, for example, ‘T3: Development of Sustainable Travel and Transport’ and ‘T10: Walking and Cycling’.  <b>Recommendation</b> No change to Draft Plan.
<b>3.15.5.4: Transport and Mobility</b>			
i) Submission makes a range of recommendations: <ul style="list-style-type: none"> <li>• The inclusion of baselines and specific targets around the change in transport modal share.</li> <li>• That the current modal split be further analysed and that specific modal shift targets for 2028 be set in line with the Smarter Travel objectives.</li> <li>• Inclusion of a mode share target of 25% of trips by bike.</li> <li>• The incorporation of data that is available on a regular basis (e.g. cycle counters, the WeCount project) to support annual monitoring, adaptation and refinement of initiatives.</li> <li>• The inclusion of specific targets to monitor Policy Objectives, including improvements to the DLR County Cycle Network, progress in relation to pedestrian/cycle footbridges over the M50/ M11, and progress on to the development of the Dublin Bay Trail.</li> <li>• Requests that consideration be given to how regular data can be collated about how people in vulnerable situations, women, children, persons with disabilities, and older persons are</li> </ul>	<b><u>B0319</u></b> <b><u>B0491</u></b> <b><u>B0794</u></b>		The Executive notes the issues raised.  With regard to the introduction of transport modal share change targets, including a cycle share target, this is comprehensively addressed in response to <b>Recommendation</b> no. 7 from the OPR (see Section 2.1 of this Report). As set out in Section 2.1, it is proposed to amend Table 15.5.5 to insert a cycle mode share target of a minimum 10% in the monitoring and evaluation column.  As set out in Table 15.5.5, the data intended to be utilised to monitor and evaluate Policy Objective T10: Walking and Cycling, includes both Census data and also DLR Cycle Counter statistics. This approach incorporates both long term trends (Census data) and also more frequent short term trends (cycle counter statistics). It is considered that the existing data sources included in Table 15.5.5 provide an appropriate framework to monitor overarching cycling trends.  Notwithstanding, it is acknowledged that additional verifiable data-sets may become available throughout the lifetime of the Plan which may be utilised for analysis purposes. The potential to incorporate new data / information is applicable not only in relation to cycling statistics, but across all Policy Objectives, and in this regard the Key Performance Indicators are not intended to comprise an exhaustive list. It is considered that the Draft Plan should be amended to reflect this position.

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>being supported and facilitated to make cycling a part of their everyday lives.</p>			<p>In terms of the inclusion of specific targets, it is noted that the delivery of desired planning outcomes is the subject to a range of external factors. This is particularly relevant in the context of transport and mobility related objectives whereby the role of the Council is often as a facilitator rather than a direct provider of infrastructure works. Furthermore, outcomes are often influenced by wider economic circumstances and the availability of resources, and as such the specification of specific targets would necessitate a firm means of ensuring implementation. With respect to Council led projects, it is noted that capital projects are progressed as planning, legal and statutory requirements are met, and contracts awarded when the full funding required to complete the project is available. Any, or a combination of, these factors may impact the pace of progression of individual projects.</p> <p>With regards to inclusivity, Policy Objective T10: Walking and Cycling supports the provision of attractive high-quality inclusive and connected walking and cycling networks. Progress is being made in this regard and the Council recently announced the introduction of the Bikehub project which provides a new inclusive bike rental scheme that will offer all abilities and ages the opportunity to take part in cycling along the Coastal Mobility Route in Dún Laoghaire, which will extend to other accessible and suitable routes across the County, in due course. With respect to monitoring progress, the Executive agrees that provision should be included under the monitoring and evaluation column for Policy Objective T10 which provides for the analysis with regards to inclusivity in cycling.</p> <p>In formulating this response, the Executive have in accordance with section 12 (8) (b) (iii) of the Planning and Development Act, 2000, (as amended) taken account of the strategic direction received from the members at pre-draft stage <i>“That the Chief Executive ensures that inclusivity as a theme permeates through relevant policies of the Draft Plan”</i>.</p> <p><b>Recommendation</b>  Add a sentence at the end of the final paragraph in Section 15.2 as follows:</p> <p><u><i>The Key Performance Indicators set out in the implementation and monitoring framework in Section 15.5 are not intended to comprise an exhaustive list and additional data / information – both quantitative and qualitative - may be incorporated for analysis purposes, as appropriate.</i></u></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>Amend the Monitoring and Evaluation column in Policy Objective T10, under Table 15.5.5 Transport and Mobility (page 340,) as follows:</p> <p><i>Change in modal share for travel to work, school or college on foot or by bicycle.</i></p> <p><i><u>Analysis of Inclusivity in cycling.</u></i></p> <p><i>Data sources: Census</i></p> <p><i>DLR Cycle Counter statistics.</i></p>
<b>3.15.5.5: Green Infrastructure and Biodiversity</b>			
<p>i) There is no target date for the preparation of the Biodiversity Action Plan. A clear target date should be added.</p>	<b>B0749</b>		<p>The Executive notes the issue raised. Policy Objective ‘GIB20: Biodiversity Plan’ of the Draft County Development Plan specifically states that it is a Policy Objective to support the provisions of the forthcoming DLR County Biodiversity Action Plan, 2021 – 2026 (see Section 8.7.1.3 of the Draft Plan). It is considered that the Draft Plan already provides adequate clarity with regards the intended timeframe relating to the forthcoming new DLR Biodiversity Action Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>



### 3.16: Appendix 1 - Tiered Approach to Land Zoning – Infrastructure Assessment

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<b>3.16.1: Tiered Approach to Land Zoning – Infrastructure Assessment</b>			
i) Concern expressed in relation to the tiered approach to zoning and the level of detail provided. It is considered that the Draft Plan is unclear as to what is required for land to be serviced.	<b>B1120</b> <b>B1145</b>		<p>The Executive notes the issue raised.</p> <p>The Infrastructure Assessment contained in Appendix 1 of the Draft Plan focuses on the provision of infrastructure that is considered to be strategic in nature. As stated in Section 1 the assessment does not comprise an exhaustive list of requisite infrastructures across the County, and furthermore, while it is intended to inform, it is not to be relied upon for development management purposes. The purpose of the assessment is to demonstrate how lands zoned in the County Development Plan with potential for residential development, are either sufficiently serviced (Tier 1) or have potential to become fully serviced within the timeframe of the Plan (Tier 2) (in compliance with Appendix 3 of the NPF). The assessment is point-in-time and acknowledges that infrastructure requirements may change. The full extent of requisite enabling infrastructure will continue to be assessed through the development management process whereupon detailed assessment will be undertaken.</p> <p><b>Recommendation</b>                      No change to Draft Plan.</p>
<b>3.16.2: Strategic Water Infrastructure – Regional</b>			
i) Irish Water confirm that the cost estimates included in Table 1 are from the National Development Plan and are subject to change.	<b>B0541</b>		<p>The Executive notes the issue raised.</p> <p>NPO 72b of the NPF requires the County Development Plan to include a reasonable estimate for the full cost of delivery of the specified infrastructure to support zoning provisions. Section 1.1. of Appendix 1 acknowledges that this requirement presents a challenge as not all costs are available or known. Notwithstanding, every effort was made to include costings where a verifiable source for same was identified. The sources of all cost estimates included in Appendix 1 are identified. In relation to Table 1, the NDP was appropriately identified as the relevant source for the cost estimates.</p> <p><b>Recommendation</b>                      No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<b>3.16.3: New Residential Community: 8 - Glenamuck</b>			
<p>i) Submission considers that a site at Glenamuck Road constitutes Tier 1 - serviced zoned land as they are able to connect to existing development services and are not dependent upon the delivery of the Glenamuck District Distributor Road.</p> <p>Requests that the 700 unit ‘cap’ in Table 4.6 is removed as the new District Distributor Road is permitted and has drawn down funding.</p>	<b>B0811</b>	9	<p>The Executive notes the issue raised.</p> <p>The Infrastructure Assessment considers the strategic enabling infrastructure requirements for the Kiltiernan-Glenamuck area as a whole and does not provide a breakdown on a site by site basis. Again, it is highlighted that while the Infrastructure Assessment is intended to inform, it is not intended to be relied upon for development management purposes, where the full extent of requisite enabling infrastructure at a site specific level will continue to be assessed. The status of zoning tiers identified in the Infrastructure Assessment are point in time – included to accord with the requirements of Appendix 3 of the NPF – and it is recognised that zoning tiers will change during the plan period as enabling infrastructure is delivered. Whether the subject site referred to in the submission is Tier 1 or Tier 2 will ultimately be determined through the development management process.</p> <p>The Kiltiernan-Glenamuck LAP states on page 57 that the development of additional units in excess of these 700 dwelling units would require the construction of the Glenamuck District Distributor Road Scheme roads, and not merely the securing of consent for the scheme. This figure was revisited by the Transport Department following approval of the Part 8 works for junction improvements at the Golden Ball. The 700 figure was still considered to be robust. The Executive maintains that this is an appropriate approach to the sequencing of the delivery of development and infrastructure.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.16.4: New Residential Communities: Old Connaught and Rathmichael</b>			
<p>i) The case is made that Old Connaught should be designated as both Tier 1 and Tier 2 lands. Submits the area is currently serviced by sufficient infrastructure to accommodate an initial phase of development in advance of the infrastructure identified in Section 4.7. Requests the introduction to Section 4.7 is revised to read as follows:</p>	<b>B0873</b>	14	<p>The Executive notes the issues raised.</p> <p>The lands at Old Connaught are not currently serviced, and the future development of the area is contingent upon the timely delivery of supporting infrastructure. The definition of Tier 2: Serviceable Zoned Lands, is set out in Appendix 3 of the NPF as follows:</p> <p><i>‘This zoning comprises lands that are not currently sufficiently serviced to support new development but have potential to become fully serviced within the life of the plan i.e. the</i></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>‘The Old Connaught and Rathmichael are not currently sufficiently serviced for the full build out of all residential zoned lands. The full build out of these areas is contingent upon the timely delivery of supporting infrastructure. An initial phase of development however can be accommodated at Old Connaught based on existing infrastructure, interim design solutions and bus service provision to be delivered in parallel with development delivery. Implementation plans incorporating phasing programmes are to be prepared as part of the Local Area Plan making provision for an initial phase of development on the basis of existing infrastructure and future phases of development to be linked with the commensurate delivery of supporting infrastructure.’</p> <p>Requests the water infrastructure provisions in Table 11 are amended to include an interim solution of water supply from 24” main to local temporary on-site reservoir to accommodate an initial phase of development. Accordingly, revise the zoning tier from Tier 2 to ‘Tier 1/Tier 2.</p> <p>Requests the transport section of Table 11 is revised as follows:</p> <ul style="list-style-type: none"> <li>• Acknowledge that the transport infrastructure identified in Bray and Environs Transport Study (2019) is for the ‘full build out’ of Old Connaught and that initial phases of development could be accommodated within the existing transport network (albeit with increased bus services that will only be</li> </ul>			<p><i>lands are currently constrained due to the need to deliver some or all development services required to support new development, i.e. road or footpath access including lighting, foul sewer drainage, surface water drainage, water supply and/or additional service capacity.’</i></p> <p>On the basis of existing infrastructural constraints, the Executive are satisfied that the Old Connaught lands currently comprise Tier 2 serviceable zoned lands.</p> <p>The lands at Old Connaught are zoned Objective ‘A1’ – ‘<i>To provide for new residential communities and Sustainable Neighbourhood Infrastructure in accordance with approved local area plans.</i>’. It is considered that a plan-led approach to the development of a new community at Old Connaught is of paramount importance. As set out in Table 2.15 of the Draft Plan, Old Connaught is identified in the Local Area Plan making programme, and it is the intention of the Council to prepare a LAP for Old Connaught during the lifetime of the County Development Plan. As set out in Section 4.7 of the Draft Plan, an implementation plan incorporating a phasing programme will be prepared as part of the Local Area Plan plan-making process, linking development with the commensurate delivery of supporting infrastructure.</p> <p>The Executive does not support the inclusion of text pertaining to initial phases of development at Old Connaught. As stated in the Draft Plan, the LAP for Old Connaught will incorporate phasing. The requisite analysis of detailed infrastructure requirement and phasing of development will be undertaken as part of the LAP process, and the Executive does not support the inclusion of text relating to phasing in advance of this process as it would lead to piecemeal development and would not align with the five strategic County outcomes underpinning the Plan.</p> <p>The status of zoning tiers identified in the Infrastructure Assessment are point in time – included to accord with the requirements of Appendix 3 of the NPF – and it is recognised that zoning tiers will change during the plan period as enabling infrastructure is delivered. This is particularly relevant in the context of Old Connaught, where it is intended that a phasing plan will be included, linking development with the commensurate delivery of supporting infrastructure.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>delivered on foot of / following permitted development).</p> <ul style="list-style-type: none"> <li>• That the extent of the initial phases to be accommodated within the existing transport network shall be determined on foot of the Implementation plan and phasing programme to be prepared and incorporated as part of the Local Area Plan</li> <li>• Remove the references to the N11/M11 Junction 4 to Junction 14 Improvement Scheme.</li> <li>• Revise the zoning tier from Tier 2 to 'Tier 1/Tier 2 – existing local transport network along with addition bus services will facilitate initial phases of development at Old Connaught.</li> </ul>			
<p>ii) Submission notes that the Strategic Land Reserve at Old Connaught North is not identified as either Tier 1 or 2 lands. Submits that the lands should be identified as Tier 2.</p>	<b>B0928</b>	14	<p>The Executive does not agree with the issue raised.</p> <p>The Strategic Land Reserve lands are not zoned for residential development and are not included in the Core Strategy of the Draft Plan. Notwithstanding, it is noted that provision is made in Section 2.5.4 of the Draft Plan that regard shall be had to this reserve in the future Old Connaught Local Area Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

**3.17: Appendix 2 - Draft Housing Strategy and Interim HNDA**

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>i) Numerous submissions question content and validity of Interim HNDA and request amendment and/or omission of Housing Mix Table contained in Chapter 12 and also in Appendix 2 Draft Housing Strategy and Housing Needs Demand Assessment. The following issues are raised:</p> <ul style="list-style-type: none"> <li>• Validity of HNDA</li> <li>• Query whether HNDA has been carried out and agreed on an area, city, County, or regional basis.</li> <li>• Query whether there was coordination assistance from regional authority.</li> <li>• Query use of Interim HNDA</li> <li>• SPPR 1</li> <li>• Mix requirements in relation to 3+ bed units conflict with SPPR1 of the Apartment Guidelines.</li> <li>• Submission provides commentary on SPPR1 of the Apartment guidelines and states that the use of the word “shall” in the SPPR is mandatory which means in their opinion that there must be no three-bed requirement even where mix is specified</li> <li>• Additional development management standards for apartments go beyond that set out in the Apartment Guidelines, including the unit mix for lands within the SUFP.</li> <li>• Query whether second part of SPPR 1 allows deviation on mix.</li> <li>• Evidence Base</li> </ul>	<p><b><u>B0324</u></b>  <b><u>B0581</u></b>  <b><u>B0596</u></b>  <b><u>B0596</u></b>  <b><u>B0801</u></b>  <b><u>B0805</u></b>  <b><u>B0811</u></b>  <b><u>B0823</u></b>  <b><u>B0831</u></b>  <b><u>B0836</u></b>  <b><u>B0843</u></b>  <b><u>B0848</u></b>  <b><u>B0873</u></b>  <b><u>B0887</u></b>  <b><u>B0889</u></b>  <b><u>B0891</u></b>  <b><u>B0902</u></b>  <b><u>B0960</u></b>  <b><u>B0981</u></b>  <b><u>B0999</u></b>  <b><u>B1072</u></b>  <b><u>B1120</u></b>  <b><u>B1145</u></b>  <b><u>B1167</u></b></p>		<p>The Executive notes the issue raised.</p> <p><b>HNDA Guidance and status of Interim HNDA</b></p> <p>As part of the Draft Plan the Planning Authority has prepared an Interim Housing Strategy and HNDA. New guidance (not section 28 guidelines) have recently been issued with an accompanying ministerial circular.</p> <p>The circular states that;  <i>“It is expected that HNDA will be integrated into the development plan review process where planning authorities give notice of review of a development plan in accordance with section 11(1) of the 2000 Act, after the date of this Circular. Planning authorities may also consider variation of a development plan where a completed HNDA significantly affects a Housing Strategy in accordance with section 95(3) of the Act”.</i></p> <p>This would indicate that the new methodology should be used for any review commencing after April 2021. As the review of the dlr Plan commenced well over 15 months before that date in January 2020 it is considered appropriate and acceptable that an Interim HNDA was prepared for the Draft Plan using available data sources, methodologies and evidence. The clarity of the circular is welcomed as the HNDA informs both the housing strategy and the core strategy. It was considered important by the Planning Authority that the mix requirements as set out in SPPR 1 of the apartment guidelines could be addressed so therefore an Interim HNDA was prepared.</p> <p>As the Planning Authority gave notice of the intention to review the current plan in January 2020 a full 15 months before the issuing of the new guidance it is recommended that a variation be carried out if the findings of the NHDA significantly affect the Housing Strategy. This should be referenced in Chapter 2, Chapter 12 and Appendix 2 HNDA.</p> <p>The new guidelines comprise a standardised methodology that can quantify the current and projected housing needs of a particular local authority area including in relation to requirements for different tenures. From a high level examination of the new HNDA methodology, it addresses need and demand, and whilst there is detailed input in terms of housing stock profile, the final output may address tenure but does not appear to address mix.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<ul style="list-style-type: none"> <li>• Interim HNDA does not provide the evidence required to propose the mix requirements particularly those around 3+ bed. Falling household size should create demand for more 1 and 2 beds</li> <li>• Mix requirement will inhibit the provision of apartment schemes in the County and will impact negatively on lifestyle choice to down size.</li> <li>• Unit mix proposed will inhibit the ability of older people to “right size at the right time”</li> <li>• Mix of developments should be assessed on a case by case basis.</li> <li>• It is not clear why ‘Lands within the SUFP’ are separately identified in terms of residential mix requirements.</li> <li>• Unclear as to why older people who may be ‘downsizing’ would seek out 3 and 4 bedroom apartment units.</li> <li>• To restrict development on the basis of unit mix at a high level would restrict provision in terms of the land use matrix of permitted and open for consideration uses</li> <li>• It is unclear if mix requirements apply to BTR but it is considered that they should not apply.</li> <li>• Sweeping restrictions on mix are inappropriate although it is important to promote a mix within a scheme.</li> <li>• To restrict development on the basis of unit mix would restrict private rental market</li> <li>• HNDA is broad analysis which does not take account of location, context or mix of tenures and overall quality of those schemes</li> </ul>			<p>Therefore, it makes sense to use a separate evidence base in the interim HNDA to address mix.</p> <p>A number of submissions have queried the status of the HNDA in the absence of the guidance and also queried the level at which it has been prepared and whether coordination assistance was provided by the regional authority. Whilst the preparation of a regional HNDA was and is being explored with both the other Dublin Authorities and the Regional Authority, the lack of guidelines at the time of preparation of the Draft Plan (bearing in mind the chronology whereby the HNDA should inform the Housing Strategy) and the requirements of SPPR1 of the Apartment Guidelines a County wide Interim HDNA was prepared. It is noted that the recently issued guidance Document in relation to HNDA are not Section 28 Guidelines. It is of note that the Eastern and Midlands Regional Authority in their submission on the Draft Plan stated that “the ‘Draft Housing Strategy and Interim HNDA’ provide a robust evidence-based framework to inform the housing policies in the draft County Development Plan”. They also welcome the intention to review the Interim HNDA upon delivery of a Regional HNDA. Given that the guidance has now issued the word “interim” can be removed. The Office of the Planning Regulator in their submission has raised no issue in terms of compliance with SPPR 1 and has in fact made mention of the inclusion of a “comprehensive statement of compliance with Section 28 Guidelines (Appendix 14) to inform the Plan”</p> <p><b>SPPR 1</b>  SPPR 1 of the Section 28 Guidelines ‘Suitable Urban Housing; Design Standards for Apartments’ 2018 states that  <i>“Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory Development Plans may specify mix for apartments and other housing schemes but only further to an evidence based HNDA that has been agreed on an areas, County, city or metropolitan basis and incorporated into the relevant plan.”</i></p> <p>In the case of the Draft Plan the Interim HNDA has been agreed on a County basis. The Executive does not agree with the contention that the mix requirements conflicts with SPPR 1, not does it accept the argument that the first part of SPPR 1 and the use of the word “shall” preclude the Planning Authority from specifying a mix in relation to 3 beds or more</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<ul style="list-style-type: none"> <li>• No rationale as to why a scheme with both apartments and houses needs to provide a mix of apartments.</li> <li>• Questions why there is a requirement to identify mix in existing area in addition to the mix requirements.</li> <li>• Mix and tenure should not be restricted.</li> <li>• Mix requirements are sweeping restrictions</li> <li>• 70% of zone land in the County is green field where apartments will be the minority, therefore there is no requirement to require mix in apartment schemes.</li> <li>• Existing housing stock across the County remains heavily skewed towards 3-Beds + and it is new apartment schemes in particular that are suitable to meet the needs of falling household sizes</li> </ul>			<p>following an evidence based HNDA. SPPR1 allows the Development Plan to specify mix further to an evidence based HNDA.</p> <p><b>Evidence Base</b>                      To address concerns raised in submissions in relation to the evidence base used further work was carried out including;</p> <ol style="list-style-type: none"> <li>1. Analysis of dlr survey of permitted Strategic Housing Developments (May 2021)</li> <li>2. Examination of qualitative urban studies, research and guidelines on sustainable neighbourhoods/communities and mix.</li> <li>3. Review of Standards in other jurisdictions.</li> </ol> <p>The review and further work supported the mix requirements contained in the Draft Plan. It is recommended that the HNDA evidence base be updated to reflect the further work.</p> <p><b>SHD dlr survey analysis</b>                      The Planning Authority maintain ongoing statistics in relation to Strategic Housing Developments granted in the County since the inception of the 2016 Act. As of May 2021 almost 10,000 apartments or houses have been permitted in the County. This figure excludes units from decisions that have been quashed and also excludes student bed spaces and shared living schemes.</p> <p>The pie chart below indicates the bed type for units granted as of May 2021.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation														
			<p style="text-align: center;"><b>SHD* Houses and Apartments by Bed Type</b></p> <table border="1" style="margin-left: auto; margin-right: auto;"> <caption>SHD* Houses and Apartments by Bed Type Data</caption> <thead> <tr> <th>Bed Type</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>1 BED</td> <td>29%</td> </tr> <tr> <td>2 BED</td> <td>47%</td> </tr> <tr> <td>3 BED</td> <td>11%</td> </tr> <tr> <td>4 BED</td> <td>5%</td> </tr> <tr> <td>4+</td> <td>6%</td> </tr> <tr> <td>Studio</td> <td>1%</td> </tr> </tbody> </table> <p>Source: dlr Planning Department, May 2021                      *Does not include data from student/shared or quashed decisions                      74% of units are one or two bed units with only 11% being 3 bed units. When one looks at bedroom units in apartments granted the percentages for one and two beds at 90% (circa 8000 units) is even higher.</p>	Bed Type	Percentage	1 BED	29%	2 BED	47%	3 BED	11%	4 BED	5%	4+	6%	Studio	1%
Bed Type	Percentage																
1 BED	29%																
2 BED	47%																
3 BED	11%																
4 BED	5%																
4+	6%																
Studio	1%																

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation										
			<div data-bbox="1055 280 1921 858" style="border: 1px solid black; padding: 10px; margin-bottom: 10px;"> <p style="text-align: center;"><b>SHD* Apartments by Bed Type</b></p> <table border="1" style="margin: 10px auto; border-collapse: collapse;"> <caption>SHD* Apartments by Bed Type Data</caption> <thead> <tr> <th>Bed Type</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>2 Bed Apartment</td> <td>58%</td> </tr> <tr> <td>1 Bed Apartment</td> <td>33%</td> </tr> <tr> <td>3 Bed Apartment</td> <td>7%</td> </tr> <tr> <td>Studio</td> <td>2%</td> </tr> </tbody> </table> </div> <p>Source: dlr Planning Department, May 2021                      *Does not include data from student/shared or quashed decisions</p> <p><b>Qualitative analysis on sustainable neighbourhood/communities and mix</b>                      Making apartment living attractive for a wide range of age groups and household types will be important to create sustainable and liveable neighbourhoods and achieve increased housing density in Ireland (Howley, 2009). “The challenge remains to create inner city residential environments that are attractive to individuals throughout all stages of their life cycle” (Howley, 2010)</p> <p>“Apartment Living in Ireland” (Housing Agency 2019)                      A 2019 Housing Agency report sets out some facts regarding apartment living in Ireland. 10% of households live in purpose built apartments versus 42% in the 28 EU states. Yet, 53% of all permission granted in the 3<sup>rd</sup> quarter of 2019 were for apartments. The report is based on qualitative survey of over 500 multi unit residents. Overall satisfaction rates were high.</p>	Bed Type	Percentage	2 Bed Apartment	58%	1 Bed Apartment	33%	3 Bed Apartment	7%	Studio	2%
Bed Type	Percentage												
2 Bed Apartment	58%												
1 Bed Apartment	33%												
3 Bed Apartment	7%												
Studio	2%												

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>However, of note was the fact that impact of open plan living on family life was highlighted as a problem along with lack of utility rooms, outdoors space and issue with older siblings having to share bedrooms. A comprehensive literature review which formed part of the study referenced an earlier 2004 study which found that Ireland has the lowest incidence of children living in multi occupancy units in Europe.</p> <p><b>2009 Urban Design Manual</b>                      The Urban Design Manual which accompanies the 2009 Section 28 Guidelines on Sustainable Urban Development includes variety, which incorporates mix of housing types, as one of the 12 criteria for a sustainable neighbourhood. Under the criteria of inclusivity, the manual highlights the role of mix of unit types in creating a balanced community. Examples of schemes with a mix of housing are provided. The manual states that;  <i>“On larger developments, the overall mix should be selected to create a mixed neighbourhood that can support a variety of people through all stages of their lives. On smaller infill developments, the mix of housing should ensure that, taken with the existing homes, the overall mix in the neighbourhood is conducive to maintaining a healthy balanced community”</i></p> <p><b>“Recommendations for living at Super density” (2007)</b>                      This 2007 report was based on understanding how to design successful high density schemes and was prepared by four of London’s major consultants specialising in residential development. High density was taken to be anything over 150 units per hectare which was based on experience in London. The report includes ten recommendations including a recommendation in relation to the creation of balanced communities with a mix of dwelling sizes. The trend in 2007 in London which was similar to what is currently being experienced here in Dublin with a focus on a mix of one and two bed room units, was not deemed to be a formula for long term social sustainability. Various academic studies are also referenced including <i>“Room to Move? Household Formation, Tenure and Housing Consumption,”</i> A recommendation from the report is to provide some larger units for family dwellings unless a location is unsuitable due to lack of amenities</p> <p><b>“Super Density, the sequel” (2015)</b>                      This study didn’t revisit the 2007 recommendations as they were considered to be relevant, accepted and practiced. It instead looked at case studies of development in London. Key recommendations include adopting mid rise development to meet housing needs and</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation																				
			<p>including family apartments and duplexes in schemes. Whilst these 2 studies are based on experience in London it is considered that the overall findings are of relevance to higher density type development in Dublin.</p> <p><b>Review of Standards in other jurisdictions</b></p> <p>A number of submissions queried the 20% and 40% requirements for 3 bed plus units. As no other Planning Authorities in the Country have yet specified a mix following on from an evidence based HNDA, a decision was made to look at experience further afield in London. The Planning Authority are also conscious that the County is in some respects ahead of the curve or indeed quite different to other counties in the country in that permitted densities in dlr are among the highest in the entire Country. A recent report on the first 250 SHD applications, prepared by TPA consultants (May 2021), recorded the highest net density per SHD scheme of 200 units per hectare in dlr. This compared to 173 units per hectare in Fingal and 122 units per hectare in Dublin City</p> <p>The housing mix requirements in a number of boroughs in London were examined. The individual Local Plans for the London Boroughs all align with the overarching London Plan which promotes a range of sizes having regard to local evidence and the 2017 London Strategic Market Assessment (SHMA).</p> <p>Examples of some housing mix standards and requirements in London Borough Local Plans</p> <table border="1" data-bbox="1055 963 2074 1359"> <thead> <tr> <th data-bbox="1055 963 1263 1031">London Borough</th> <th data-bbox="1263 963 1471 1031">Plan</th> <th data-bbox="1471 963 1682 1031">1 bed</th> <th data-bbox="1682 963 1890 1031">2 bed</th> <th data-bbox="1890 963 2074 1031">3 bed plus</th> </tr> </thead> <tbody> <tr> <td data-bbox="1055 1031 1263 1195">Brent</td> <td data-bbox="1263 1031 1471 1195">Local Plan London Borough of Brent (mid review 2021)</td> <td data-bbox="1471 1031 1682 1195"></td> <td data-bbox="1682 1031 1890 1195"></td> <td data-bbox="1890 1031 2074 1195">25%</td> </tr> <tr> <td data-bbox="1055 1195 1263 1262">Merton</td> <td data-bbox="1263 1195 1471 1262">Merton Local Plan (2018)</td> <td data-bbox="1471 1195 1682 1262">25 – 35%</td> <td data-bbox="1682 1195 1890 1262">35 – 40%</td> <td data-bbox="1890 1195 2074 1262">30 – 40%</td> </tr> <tr> <td data-bbox="1055 1262 1263 1359">Bromley</td> <td data-bbox="1263 1262 1471 1359">Bromley Local Plan (2019)</td> <td data-bbox="1471 1262 1682 1359">SHMA requirement of 53%</td> <td data-bbox="1682 1262 1890 1359">21%</td> <td data-bbox="1890 1262 2074 1359">20%*</td> </tr> </tbody> </table>	London Borough	Plan	1 bed	2 bed	3 bed plus	Brent	Local Plan London Borough of Brent (mid review 2021)			25%	Merton	Merton Local Plan (2018)	25 – 35%	35 – 40%	30 – 40%	Bromley	Bromley Local Plan (2019)	SHMA requirement of 53%	21%	20%*
London Borough	Plan	1 bed	2 bed	3 bed plus																			
Brent	Local Plan London Borough of Brent (mid review 2021)			25%																			
Merton	Merton Local Plan (2018)	25 – 35%	35 – 40%	30 – 40%																			
Bromley	Bromley Local Plan (2019)	SHMA requirement of 53%	21%	20%*																			

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation				
			Newham	Newham Local Plan (2018)			39%
			Lambeth	Lambeth Local Plan (2015)	No more than 20%	20 – 50%	40%
			Hackney	Hackney Local Plan (2020)	Lower than 2 bed	Higher than 1 bed	33%
			Hounslow	Hounslow Local Plan (2015)	30%	40%	30%
			Islington	Islington Local Plan (2013)	10%	75%	15%
			<p>The table above provides some standards and requirements in relation to housing mix (apartments and houses) from various Local Plans for London Boroughs. Some are taken from policy and some are the requirements based on assessments carried out. Some boroughs differentiate between tenures for mix. In those instances, the market led tenure is given as policy in the Draft Plan allows social housing schemes put forward a mix based on specific requirements.</p>				
			<p>While no one size fits all, and boroughs may differ greatly in terms of spatial, socio economic and demographic make up, all are in agreement that providing a mix of unit sizes is important. It is noted that the requirements for 3 bed plus as set out in the Draft dlr Plan which range from 20% to 40% are very similar to the range of requirements throughout the London boroughs examined.</p>				
			<p><b>Conclusion based on review of evidence base</b> Qualitative urban studies indicate that to create a sustainable community and neighbourhood a mix of unit types is required particularly in larger high density schemes.</p>				
			<p>Recent permissions granted in the County include very large schemes with a monotypology of units – studio, one and 2 beds. Evidence as set out above indicates that these are not conducive to creating sustainable neighbourhoods, notwithstanding the arguments that have been put forward around the fact that the County contains a high proportion of existing housing stock that is 3 or 4 bed units. An examination of standards in a number of London</p>				

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>Boroughs would indicate that the evidence based mix requirement being put forward in the Draft Plan are very similar in range.</p> <p>It is therefore considered that the mix requirements as set out in the Draft Plan should remain so as to ensure the delivery of sustainable neighbourhoods and communities.</p> <p>The assertion in the submissions received that the mix requirement will restrict apartments is not accepted as the Planning Authority are fully supportive of compact growth and apartment provision but wish to ensure a mix of unit sizes so as to cater for differing households and to provide a sustainable community. The assertion that apartments will be the minority as the majority of zoned land in the County is green field is not born out by recent trends nor is it in line with the compact growth policy approach. A number of submissions query how the provision of 3 and 4 beds will aid down sizing. It is recommended that the Interim HNDAs be amended to also reflect the requirement for household units as the mix requirement is not solely for those down sizing. Falling household size is acknowledged as between 60% to 80% of units can be a mix of studio, one and 2 bed. The suggestion that mix be dealt with on a case by case basis is not considered to be a robust policy means of ensuring a sustainable mix of units. The reason that schemes with both houses and apartments require a mix of apartment sizes is so as to allow choice in apartment provision as in many schemes with both house and apartment typologies, the apartments tend to be all one and two bed and the houses tend to be all 3 bed plus. The requirement to provide the details of the existing mix in the surrounding area is so as to allow the Planning Authority to assess overall mix in any area in the County. The information gleaned may indicate that there is a greater necessity for 3 beds over and above the minimum required.</p> <p><b>Build to Rent and Mix</b></p> <p>It is accepted that the Draft Plan is not overly clear that the mix requirements do not apply to Build to Rent Schemes. SPPR 8 of the Apartments guidelines is clear that;  <i>For proposals that qualify as specific BTR development in accordance with SPPR 7: (i) No restrictions on dwelling mix and all other requirements of these Guidelines shall apply, unless specified otherwise;</i></p> <p>It is recommended that the Plan be amended to provide clarity.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>A number of submissions have queried the specific reference to the SUIP area in the table on mix. In terms of residential development the area is characterised by apartments as opposed to other typologies hence the need to ensure a mix of unit sizes. It is noted that many proposals coming forward in the SUIP area are Build to Rent Schemes.</p> <p><b>Recommendations</b></p> <p>Remove the word “Interim” from references to “Interim Housing Strategy and HNDA” throughout the entire Plan (Chapters 1, 2 4, 12, Appendix 2)</p> <p>Amend Chapter 1 (pg 16) as follows,  <i>Section 1.6.1 remove second bullet point “Housing Need Demand Assessment Guidelines”  Add after second bullet point a new sentence (non bulleted) as follows;  <u>“Guidance on the preparation of a Housing Need Demand Assessment has issued in April 2021 but with the proviso that Planning Authorities who have already commenced review do not need to integrate the new methodology into the review but should consider a variation of the Plan if the HNDA significantly affects the Housing Strategy”.</u></i></p> <p>Amend Chapter 2 (pg 28) as follows  Amend section 2.3.5. as follows,  Replace second para as follows;  <i>The Department of Housing, Planning and Local Government have issued Guidelines entitled “Guidance on the Preparation of the Housing Need and Demand Assessment” in April 2021. An accompanying circular expects that the new HNDAs will be integrated into reviews that commence after the date of issue of the Guidance and that other Planning Authorities may vary their Plan. Amend para 3 as follows;  Pending the issuing of Section 28 Guidelines and the subsequent preparation of a regional HNDA, DLR has prepared a Housing Strategy and HNDA (see Appendix 2) which will inform housing policy in the County. The Housing Strategy element is based on the overall population and housing land requirements set out in the Core Strategy</i>  Amend Policy Objective CS1 as follows;  <i>Policy Objective CS1 – Housing Need Demand Assessment  It is a Policy Objective to accord with the Housing Strategy and Housing Needs Demand Assessment 2022—2028 and to carry out a regional Housing Needs and Demand Assessment</i></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><i>post adoption of the Plan and to consider varying the Plan if required. (Consistent with NPO 37 of the NPF).</i></p> <p>Amend Chapter 12 as follows;                      Section 12.3.6 Built to Rent (pg 238)                      Add  <u><i>The requirements of section 12.3.3 in relation to unit mix do not apply to Build to Rent Schemes in accordance with definition in the guidelines.</i></u></p> <p>Amend  <i>Where any derogations in standards including standards relating to open space, car parking and storage are availed of, a condition should be attached to any grant of permission to state that planning permission must be sought for a change of tenure to another tenure model following the period specified in the covenant.</i>                      To                      Where any derogations in standards including standards relating to <u>unit mix</u>, open space, car parking and storage are availed of, a condition should be attached to any grant of permission to state that planning permission must be sought for a change of tenure to another tenure model following the period specified in the covenant.</p> <p>Amend Appendix 2 Interim Housing Strategy and HNDA as follows;                      Add an additional paragraph to the end of section 2.1.1 (pg 27) as follows;  <u><i>Since the preparation of the Housing Strategy and HNDA, new guidance (not section 28 guidelines) has been issued with an accompanying ministerial circular. Chapter 2 of the Plan includes an objective to carry out a regional Housing Needs and Demand Assessment post adoption of the Plan and to consider varying the Plan if required”</i></u></p> <p>Amend section 2.1.3.4 (pg 32)                      Add an additional line to the end of the first paragraph  <u><i>It is noted that new guidance (not section 28 guidelines) has been issued in relation to the preparation of the HNDA along with an accompanying ministerial circular.</i></u></p> <p>Add new paragraph to the end of the section as follows;</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p><i><u>"The new guidance (not section 28 guidelines) issued on HNDA includes an accompanying ministerial circular which states that;</u></i></p> <p><i><u>"It is expected that HNDA will be integrated into the development plan review process where planning authorities give notice of review of a development plan in accordance with section 11(1) of the 2000 Act, after the date of this Circular. Planning authorities may also consider variation of a development plan where a completed HNDA significantly affects a Housing Strategy in accordance with section 95(3) of the Act".</u></i></p> <p><i><u>This would indicate that the new methodology should be used for any review commencing after April 2021. As the review of the dlr Plan commenced well over 15 months before that date in January 2020 it is considered appropriate and acceptable that a HNDA was prepared for the Draft Plan using available data sources, methodologies and evidence. The clarity of the circular is welcomed as the HNDA informs both the housing strategy and the core strategy".</u></i></p> <p>Amend section 2.1.3.5 (pg 33)</p> <p><i>In the absence of a Regional HNDA or the issuing of Section 28 Guidelines relating to this issue</i></p> <p>To</p> <p><i>In the absence of a Regional HNDA or the issuing of Section 28 Guidelines relating to this issue (guidance was issued after the preparation of the Draft Plan)</i></p> <p>Amend 5th paragraph as follows;</p> <p><i>Pending guidelines and methodology on HNDAs, the establishment of a coordination and monitoring unit to assist Local Authorities and Regional Authorities and the development and coordination of a centralised spatial database for Local Authority Housing data as stipulated in NPO37 of the NPF an Interim Housing Needs Demand Assessment has been carried out. This is so as to allow demographic trends and housing stock profiles inform policy formulation in particular policy in relation to housing type and mix.</i></p> <p>To</p> <p><i><del>Pending the preparation of a regional HNDA guidelines and methodology on HNDAs, the establishment of a coordination and monitoring unit to assist Local Authorities and Regional Authorities and the development and coordination of a centralised spatial database for Local Authority Housing data as stipulated in NPO37 of the NPF an Housing Needs Demand</del></i></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><i>Assessment has been carried out. This is so as to allow demographic trends and housing stock profiles inform policy formulation in particular policy in relation to housing type and mix.</i></p> <p><i>Amend Section 2.4 (pg 59)</i></p> <p><i>As discussed in the previous section of this document, arising from recent changes in planning policy, Local Authorities are now also obliged under National Policy Objective 27 to prepare a Housing Needs Development Assessment (HNDA) for their functional area. However, as also noted previously, pending the issuing of new statutory guidelines on development plans, no HNDAs have been prepared by any Local Authorities.</i></p> <p><i>In the absence of the completion of the updated HLA and the preparation of a HNDA for the Dún LaoghaireRathdown area, the following section of this Draft Housing Strategy and Interim HNDA sets out a broad overview of the current state of play regarding the affordability of housing units in the area.</i></p> <p><i>To</i></p> <p><i>As discussed in the previous section of this document, arising from recent changes in planning policy, Local Authorities are now also obliged under National Policy Objective 27 to prepare a Housing Needs Development Assessment (HNDA) for their functional area. However, as also noted previously, pending the issuing of new statutory guidelines on development plans, no HNDAs have been prepared by any Local Authorities.</i></p> <p><i><del>Pending completion of a regional HNDA post adoption of the Plan the absence of the completion of the updated HLA and the preparation of a HNDA for the Dún LaoghaireRathdown area, the following section of this Draft Housing Strategy and Interim HNDA sets out a broad overview of the current state of play regarding the affordability of housing units in the area.</del></i></p> <p><i>Amend Section 2.9.2;(pg 94)</i></p> <p><i>4<sup>th</sup> paragraph, after “family type with children”. Add “<u>There was a resultant 9% increase in children under 5 compared to 1.5% nationally</u>”.</i></p> <p><i>Add the following new sections after the 6<sup>th</sup> paragraph</i></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation												
			<p><u><i>SHD dlr survey analysis</i></u>  <u><i>The Planning Authority maintain ongoing statistics in relation to Strategic Housing Developments granted in the County since the inception of the 2016 Act. As of May 2021 almost 10,000 apartments or houses have been permitted in the County. This figure excludes units from decisions that have been quashed and also excludes student bed spaces and shared living schemes.</i></u></p> <p><u><i>The pie chart below indicates the bed type for units granted as of May 2021.</i></u></p> <div data-bbox="1055 571 1946 1098" data-label="Figure"> <table border="1"> <caption>SHD* Houses and Apartments by Bed Type</caption> <thead> <tr> <th>Bed Type</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>1 BED</td> <td>29%</td> </tr> <tr> <td>2 BED</td> <td>47%</td> </tr> <tr> <td>3 BED</td> <td>11%</td> </tr> <tr> <td>4 BED</td> <td>5%</td> </tr> <tr> <td>4+</td> <td>6%</td> </tr> </tbody> </table> </div> <p><u><i>Source: dlr Planning Department, May 2021</i></u>  <u><i>*Does not include data from student/shared or quashed decisions</i></u></p> <p><u><i>74% of units are one or two bed units with only 11% being 3 bed units. When one looks at bedroom units in apartments granted the percentages for one and two beds at 90% (circa 8000 units) is even higher.</i></u></p>	Bed Type	Percentage	1 BED	29%	2 BED	47%	3 BED	11%	4 BED	5%	4+	6%
Bed Type	Percentage														
1 BED	29%														
2 BED	47%														
3 BED	11%														
4 BED	5%														
4+	6%														

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation										
			<div data-bbox="1055 280 1917 858"> <p><b>SHD* Apartments by Bed Type</b></p> <table border="1"> <thead> <tr> <th>Bed Type</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>2 Bed Apartment</td> <td>58%</td> </tr> <tr> <td>1 Bed Apartment</td> <td>33%</td> </tr> <tr> <td>3 Bed Apartment</td> <td>7%</td> </tr> <tr> <td>Studio</td> <td>2%</td> </tr> </tbody> </table> </div> <p><i>Source: dlr Planning Department, May 2021</i>  <i>*Does not include data from student/shared or quashed decisions</i></p> <p><u>Qualitative analysis on sustainable neighbourhood/communities and mix</u></p> <p><i>“Apartment Living in Ireland” (Housing Agency 2019)</i>  <i>A 2019 Housing Agency report sets out some facts regarding apartment living in Ireland. 10% of households live in purpose built apartments versus 42% in the 28 EU states. Yet, 53% of all permission granted in the 3<sup>rd</sup> quarter of 2019 were for apartments. The report is based on qualitative survey of over 500 multi unit residents. Overall satisfaction rates were high. However, of note was the fact that impact of open plan living on family life was highlighted as a problem along with lack of utility rooms, outdoors space and issue with older siblings having to share bedrooms. A comprehensive literature review which formed part of the study referenced an earlier 2004 study which found that Ireland has the lowest incidence of children living in multi occupancy units in Europe.</i></p>	Bed Type	Percentage	2 Bed Apartment	58%	1 Bed Apartment	33%	3 Bed Apartment	7%	Studio	2%
Bed Type	Percentage												
2 Bed Apartment	58%												
1 Bed Apartment	33%												
3 Bed Apartment	7%												
Studio	2%												

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><u><a href="#">2009 Urban Design Manual</a></u>  <u><a href="#">The Urban Design Manual which accompanies the 2009 Section 28 guidelines on Sustainable Urban Development includes variety, which incorporates mix of housing types, as one of the 12 criteria for a sustainable neighbourhood. Under the criteria of inclusivity, the manual highlights the role of mix of unit types in creating a balanced community. Examples of schemes with a mix of housing are provided. The manual states that;</a></u>  <u><a href="#">“On larger developments, the overall mix should be selected to create a mixed neighbourhood that can support a variety of people through all stages of their lives. On smaller infill developments, the mix of housing should ensure that, taken with the existing homes, the overall mix in the neighbourhood is conducive to maintaining a healthy balanced community”</a></u></p> <p><u><a href="#">Recommendations for living at Superdensity (2007)</a></u>  <u><a href="#">This 2007 report was based on understanding how to design successful high density schemes. High density was taken to be anything over 150 units per hectare which was based on experience in London. The report includes ten recommendations including a recommendation in relation to the creation of balanced communities with a mix of dwelling sizes. The trend in 2007 in London which was similar to what is currently being experienced here in Dublin with a focus on a mix of one and two bed room units, was not deemed to be a formula for long term social sustainability. Various academic studies are also referenced including “Room to Move? Household Formation, Tenure and Housing Consumption,” A recommendation from the report is to provide some larger units for family dwellings unless a location is unsuitable due to lack of amenities</a></u></p> <p><u><a href="#">Super Density, the sequel (2015)</a></u>  <u><a href="#">This study didn’t revisit the 2007 recommendations as they were considered to be relevant, accepted and practiced. It instead looks at case studies of development in London. Key recommendations include adopting mid rise development to meet housing needs and including family apartments and duplexes in schemes. Whilst these 2 studies are based on experience in London it is considered that the overall findings are of relevance to higher density type development in Dublin.</a></u></p> <p><u><a href="#">Review of Standards in other jurisdictions</a></u></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation																																													
			<p><u>As no other Planning Authorities in the Country have yet specified a mix following on from an evidence based HNDA it was decided to look at experience further afield in London. The Local Plan for the London boroughs all align with the overarching London Plan which promotes a range of sizes having regard to local evidence and the 2017 London Strategic Market Assessment (SHMA)</u></p> <p><u>Examples of some housing mix standards and requirements in London Borough Local Plans</u></p> <table border="1" data-bbox="1055 504 2074 1171"> <thead> <tr> <th data-bbox="1055 504 1263 539">London Borough</th> <th data-bbox="1263 504 1471 539">Plan</th> <th data-bbox="1471 504 1686 539">1 bed</th> <th data-bbox="1686 504 1883 539">2 bed</th> <th data-bbox="1883 504 2074 539">3 bed plus</th> </tr> </thead> <tbody> <tr> <td data-bbox="1055 539 1263 671"><i>Brent</i></td> <td data-bbox="1263 539 1471 671"><i>Local Plan London Borough of Brent (mid review 2021)</i></td> <td data-bbox="1471 539 1686 671"></td> <td data-bbox="1686 539 1883 671"></td> <td data-bbox="1883 539 2074 671">25%</td> </tr> <tr> <td data-bbox="1055 671 1263 738"><i>Merton</i></td> <td data-bbox="1263 671 1471 738"><i>Merton Local Plan (2018)</i></td> <td data-bbox="1471 671 1686 738">25 – 35%</td> <td data-bbox="1686 671 1883 738">35 – 40%</td> <td data-bbox="1883 671 2074 738">30 – 40%</td> </tr> <tr> <td data-bbox="1055 738 1263 837"><i>Bromley</i></td> <td data-bbox="1263 738 1471 837"><i>Bromley Local Plan (2019)</i></td> <td data-bbox="1471 738 1686 837">SHMA requirement of 53%</td> <td data-bbox="1686 738 1883 837">21%</td> <td data-bbox="1883 738 2074 837">20%</td> </tr> <tr> <td data-bbox="1055 837 1263 904"></td> <td data-bbox="1263 837 1471 904"><i>Newham Local Plan (2018)</i></td> <td data-bbox="1471 837 1686 904"></td> <td data-bbox="1686 837 1883 904"></td> <td data-bbox="1883 837 2074 904">39%</td> </tr> <tr> <td data-bbox="1055 904 1263 971"><i>Lambeth</i></td> <td data-bbox="1263 904 1471 971"><i>Lambeth Local Plan (2015)</i></td> <td data-bbox="1471 904 1686 971">No more than 20%</td> <td data-bbox="1686 904 1883 971">20 – 50%</td> <td data-bbox="1883 904 2074 971">40%</td> </tr> <tr> <td data-bbox="1055 971 1263 1038"><i>Hackney</i></td> <td data-bbox="1263 971 1471 1038"><i>Hackney Local Plan (2020)</i></td> <td data-bbox="1471 971 1686 1038">Lower than 2 bed</td> <td data-bbox="1686 971 1883 1038">Higher than 1 bed</td> <td data-bbox="1883 971 2074 1038">33%</td> </tr> <tr> <td data-bbox="1055 1038 1263 1106"><i>Hounslow</i></td> <td data-bbox="1263 1038 1471 1106"><i>Hounslow Local Plan (2015)</i></td> <td data-bbox="1471 1038 1686 1106">30%</td> <td data-bbox="1686 1038 1883 1106">40%</td> <td data-bbox="1883 1038 2074 1106">30%</td> </tr> <tr> <td data-bbox="1055 1106 1263 1173"><i>Islington</i></td> <td data-bbox="1263 1106 1471 1173"><i>Islington Local Plan (2013)</i></td> <td data-bbox="1471 1106 1686 1173">10%</td> <td data-bbox="1686 1106 1883 1173">75%</td> <td data-bbox="1883 1106 2074 1173">15%</td> </tr> </tbody> </table> <p><u>The table above provides some standards and requirements in relation to housing mix (apartments and houses) from various Local Plans for London Boroughs. Some are taken from policy and some are the requirements from assessments carried out. Some boroughs differentiate between tenures for mix. In those instances, the market led tenure is given as</u></p>	London Borough	Plan	1 bed	2 bed	3 bed plus	<i>Brent</i>	<i>Local Plan London Borough of Brent (mid review 2021)</i>			25%	<i>Merton</i>	<i>Merton Local Plan (2018)</i>	25 – 35%	35 – 40%	30 – 40%	<i>Bromley</i>	<i>Bromley Local Plan (2019)</i>	SHMA requirement of 53%	21%	20%		<i>Newham Local Plan (2018)</i>			39%	<i>Lambeth</i>	<i>Lambeth Local Plan (2015)</i>	No more than 20%	20 – 50%	40%	<i>Hackney</i>	<i>Hackney Local Plan (2020)</i>	Lower than 2 bed	Higher than 1 bed	33%	<i>Hounslow</i>	<i>Hounslow Local Plan (2015)</i>	30%	40%	30%	<i>Islington</i>	<i>Islington Local Plan (2013)</i>	10%	75%	15%
London Borough	Plan	1 bed	2 bed	3 bed plus																																												
<i>Brent</i>	<i>Local Plan London Borough of Brent (mid review 2021)</i>			25%																																												
<i>Merton</i>	<i>Merton Local Plan (2018)</i>	25 – 35%	35 – 40%	30 – 40%																																												
<i>Bromley</i>	<i>Bromley Local Plan (2019)</i>	SHMA requirement of 53%	21%	20%																																												
	<i>Newham Local Plan (2018)</i>			39%																																												
<i>Lambeth</i>	<i>Lambeth Local Plan (2015)</i>	No more than 20%	20 – 50%	40%																																												
<i>Hackney</i>	<i>Hackney Local Plan (2020)</i>	Lower than 2 bed	Higher than 1 bed	33%																																												
<i>Hounslow</i>	<i>Hounslow Local Plan (2015)</i>	30%	40%	30%																																												
<i>Islington</i>	<i>Islington Local Plan (2013)</i>	10%	75%	15%																																												

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><u>policy in the Draft Plan allows social housing schemes put forward a mix based on specific requirements.</u></p> <p><u>While no one size fits all, and boroughs may differ greatly in terms of spatial, socio economic and demographic make up, all are in agreement that providing a mix of unit sizes is important. It is noted that the requirements for 3 bed plus as set out in Chapter 12 and in this Interim Housing Strategy and HNDA which range from 20% to 40% are very similar to the range of requirements in the London boroughs.</u></p> <p><u>Conclusion based on review of evidence base</u></p> <p><u>Qualitative urban studies indicate that to create a sustainable community and neighbourhood a mix of unit types is required particularly in larger high density schemes. Recent permissions granted in the County include very large schemes with a monotypology of units – studio, one and 2 beds. Evidence as set out above indicates that these are not conducive to creating sustainable neighbourhoods, notwithstanding the arguments that have been put forward around the fact that the County contains a high proportion of existing housing stock that is 3 or 4 bed units.</u></p> <p>7<sup>th</sup> Paragraph, amend</p> <p><i>It is considered that the robust and detailed analysis set out in this Interim HNDA allows for inclusion of a specific policy on mix in order to avoid mono tenure and mono type schemes and ensure provision of sustainable, liveable, mixed neighbourhoods in line with policies set out in Chapter 4 Neighbourhood - People, Homes and Places.</i></p> <p>To</p> <p><i>It is considered that the robust and detailed analysis and <u>evidence base</u> set out in this HNDA allows for inclusion of a specific policy on mix in order to avoid mono tenure and mono type schemes and ensure provision of sustainable, liveable, mixed neighbourhoods in line with policies set out in Chapter 4 Neighbourhood - People, Homes and Places.</i></p> <p>8<sup>th</sup> paragraph, amend</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><i>However, to allow for choice and to aid in downsizing a greater mix is needed in the apartments offer with a move away from the predominance of schemes with one and two beds to schemes that ensure that there is a more varied mix with a percentage of 3 and 4 bed apartment units.</i></p> <p>To</p> <p><i>However, to allow for choice, to provide for family units, and to aid in downsizing a greater mix is needed in the apartments offer with a move away from the predominance of schemes with one and two beds to schemes that ensure that there is a more varied mix with a percentage of 3 and 4 bed apartment units.</i></p>
<p>ii) Council should prioritise the building of social/affordable housing on state owned land. Present plan to build 1300 units, 130 to be social housing, is totally inadequate. There should be a strategy for delivering social and affordable housing on state owned lands.</p>	<p><b><u>B0023</u></b> <b><u>B1096</u></b></p>		<p>The Executive notes the issues raised.</p> <p>At present the legislation only allows the Council to require 10% of units provided on a private site to be social housing. For lands owned by state authorities the Planning Authority does not have the legal ability to prioritise the building of social/affordable housing. However, one of the five pillars of Government Policy in relation to housing as set out in “Rebuilding Ireland” was accelerating social housing delivery. One of the results of this pillar was the establishment of the Land Development Agency (LDA) which was created to coordinate land within State control for more optimal uses where appropriate, with a focus on the provision of housing.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>iii) Considers that affordable build to buy units for families are required in the County.</p> <p>There is a lack of suitable, affordable housing in DLR, with rents also high.</p>	<p><b><u>B0023</u></b> <b><u>B1126</u></b></p>		<p>The Executive notes the issues raised and appreciates that affordability is an issue in the County. There are only certain tools available to the Planning Authority to address the issue of affordability. Part V requirements which are currently 10% will accord with any relevant updates to legislation which may address affordability.</p> <p><b>Recommendation</b> No change to Draft Plan</p>



### **3.18: Appendix 3 - Development Management Thresholds (2022 -2028)**

No submissions have been received raising issues with regard to Appendix 3.



### 3.19: Appendix 4 - Heritage Lists

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<b>3.19.1: Record of Protected Structures (RPS)</b>			
<b>3.19.1.1: Suggested additions to the RPS</b>			
i) The old "Packhorse Bridge", and the weir just west of Classon's Bridge, and for the weir just east of Waldron's Bridge, at Orwell Walk should both be listed as a Protected Structure.	<b>B0017</b>	2	<p>The Executive notes the suggested additions to the Record of Protected Structures (RPS).</p> <p>It is considered that the bridge and weirs constitute industrial rather than architectural heritage and would sit more comfortably within the Industrial Heritage Sites listed in Section 4.5 'Industrial Heritage' of Appendix 4 in the Draft Plan.</p> <p>It is noted that Classon's Bridge is listed on Dublin City Council's Industrial Heritage Record (DCIHR No.22-03-014). Description: Triple Arch Masonry Bridge built 1790.</p> <p><b>Recommendation</b> Amend Table 4.5 'Industrial Heritage Sites', Appendix 4 and map 1 of the Draft Plan to add:</p> <ul style="list-style-type: none"> <li>• Packhorse Bridge.</li> <li>• Weir to west of Classon's Bridge</li> <li>• Weir to east of Waldron's Bridge.</li> </ul>
ii) Submission welcomes the addition of the following to the RPS: <ul style="list-style-type: none"> <li>• The House, its Stable yard/Craft area [RPS No. 1518].</li> <li>• Laurelmere [RPS No. 1592].</li> <li>• No. 2033: House (Head Gardener).</li> <li>• No. 2034: Farmyard Complex.</li> <li>• No. 2057: Gateway.</li> <li>• No. 2082: Gateway.</li> <li>• No. 2083: Gateway.</li> <li>• No. 2084: Walled garden.</li> </ul> <p>Submission requests that the RPS list should be expanded to include the following items within Marlay Demesne:</p>	<b>B0052</b> <b>B0794</b>	5	<p>The Executive notes the suggested additions to the RPS.</p> <p>All structures within Marlay Park that were identified by the NIAH survey and recommended by the Minister of Housing, Local Government and Heritage are added onto the Record of Protected Structures (RPS) in Appendix 4 of the Draft Plan. These include:</p> <ul style="list-style-type: none"> <li>• Walled Garden (Regional)60220013 – RPS No. 2084.</li> <li>• Head Gardener's Cottage (Regional)60220014 – RPS No. 2033.</li> <li>• Farmyard Stables/Staff Depot (Regional)60220016 – RPS No. 2034.</li> <li>• Gateway on Grange Road (Regional)60220017 – RPS No. 2083.</li> <li>• Gateway on Grange Road (Regional)60220019 – RPS No. 2082.</li> <li>• Gate Lodge on Grange Road (Regional)60220020 – RPS No. 2057.</li> <li>• Gateway on Grange Road (Regional)60220021 – RPS No. 2081.</li> </ul>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> <li>• Clock Tower.</li> <li>• Bridges.</li> <li>• Weirs.</li> <li>• The tree belt around the pond.</li> <li>• The serpentine pond and streams flowing into the pond ('Rare survivors within the County of eighteenth-century demesne lakes'), and, Boundary Wall.</li> <li>• 60220020 Gate Lodge on Grange Road (Regional).</li> <li>• 60220021 Gate Lodge on Grange Road (Regional).</li> <li>• The Gate Lodge adjacent to the Eastern Gateway (NIAH 60220021).</li> <li>• Marlay Park Ha – Ha.</li> <li>• Marlay Park Central Pond.</li> </ul>			<p>It is noted that the Gate Lodge, RPS No. 2057 has been inadvertently described as a 'Gateway' and the Gateway, RPS No. 2081 has been added under Map 12 in Table 4.1 'Record of Protected Structures' in Appendix 4 of the Draft Plan. These anomalies will be amended.</p> <p>The Clock Tower (known as the Bell Tower) forms part of the Farmyard Complex which is a proposed addition to the Record of Protected Structures, RPS No. 2034.</p> <p>The boundary wall and ha-ha form part of the curtilage of Marlay Park House. Under the Planning &amp; Development Act, 2000 (as amended), this protection extends to both the exterior and interior of the structure and its curtilage along with any structures (and their interior) located within that curtilage – which in this case would include the wall and ha-ha. None of the other items or structures referred to in the submission formed part of the Ministerial recommendations.</p> <p>Marlay Park has been added to Table 4.4 as a proposed Candidate Architectural Conservation Area (cACA) as part of the Draft County Development Plan 2022-2028. Marlay Park is therefore covered by Policy Objective HER18 'Development within a Candidate Architectural Conservation Area'. It is also afforded protection through various other Policy Objectives in Chapter 11 of the Draft Plan including Policy Objective HER8 'Work to Protected Structures' where it is an objective to, "Ensure historic landscapes and gardens associated with Protected Structures are protected from inappropriate development", and Policy Objective HER26: 'Historic Demesnes and Gardens.'</p> <p><b>Recommendation</b> Amend Table 4.1 'Record of Protected Structures' in Appendix 4 of the Draft Plan as follows:  Amend description of RPS No. 2057 (p.167) at Marley House from "Gateway" to "Gate Lodge".  Amend Map number of RPS No. 2081 at Marlay House from "12" to "5".</p>
<p>iii) Submission requests that Markiewicz Cottage on the Blackglen Road should be added to the Record of Protected Structures.</p>	<b>B0079</b>	5	<p>The Executive disagrees with the requested addition to the RPS.</p> <p>It is the Planning Authorities understanding that the cottage in question (which formed part of two attached buildings) was demolished in the 1970s (Source "On the Borders of the Pale, A History of the Kilgobbin, Stepside and Sandyford area" by Rob Goodbody, 1993).</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>There would appear to be ruins at this location. The ruins in question do not meet one or more of the Categories of Special Interest as set out in Section 51(1) of the Planning and Development Act, 2000, (as amended).</p> <p>The remaining ruins would have local heritage interest and there may be potential to integrate the ruins within public realm feature should the area be developed. In this regard, Policy Objectives HER22: ‘Protection of Historic Street Furniture and Public Realm’ may apply.</p> <p>It is noted that the Historic Landscape Character Assessment for Barnacullia (2006) recommends “features such as house ruins ....offer opportunity for creative use of the landscape.”</p> <p>There may also be an opportunity to provide a civic memorial with regard to the historical context of the site along the adjacent public road. <b>This process however, is not a County Development Plan matter</b> rather this would be applied for under a separate process and would be reviewed having regard to Policy Objective HER27: ‘Civic Memorials’.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Submission requests that the Old Cottages at The Hill in Stillorgan are added to the RPS.</p>	<p><b>B0079</b></p>	<p>2</p>	<p>The Executive disagrees with the requested addition to the RPS.</p> <p>The group of buildings referred to in the submission do not meet one or more of the Categories of Special Interest as set out in Section 51(1) of the Planning and Development Act, 2000, (as amended).</p> <p>The buildings in question have been extended and significantly altered with new roof coverings, altered facades and fenestration with modern windows and doors prevalent. These changes have eroded the original architectural character with the result that they are not considered to be of significant architectural interest to warrant being added to the RPS.</p> <p>The Draft Plan includes policies designed to protect those older buildings which, although not Protected Structures, are considered to make a positive contribution to the streetscapes. These include Policy HER20: ‘Buildings of Vernacular and Heritage Interest’, which seeks to</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p><i>"retain where appropriate, and encourage the rehabilitation and suitable reuse of existing older buildings/structures/features which make a positive contribution to the character and appearance of the area and streetscape in preference to their demolition and redevelopment and to preserve surviving shop and pub fronts of special historical or architectural interest including signage and associated features."</i></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>v) Submission seeks the addition of Taylors Three Rock, 16 Grange Rd, Rathfarnham to the RPS.</p>	<p><b><u>B0084</u></b></p>	<p>5</p>	<p>The Executive disagrees with the requested addition to the RPS.</p> <p>The NIAH extensively surveyed this part of the County and did not identify the building for inclusion. According to the submission the building was heavily refurbished in 1986.</p> <p>The Executive do not consider the building to meet one or more of the Categories of Special Interest as set out in Section 51(1) of the Planning and Development Act, 2000, (as amended) to warrant inclusion on the Record of Protected Structures (Architectural, Historical, Archaeological, Artistic, Cultural, Scientific, Social or Technical interest).</p> <p>It is considered this structure would be covered by Policy objective HER20: 'Buildings of vernacular and heritage interest', which seeks to <i>"retain where appropriate and encourage the rehabilitation and suitable reuse of existing older buildings/structures/features which make a positive contribution to the character and appearance of the area and streetscape in preference to their demolition and redevelopment and to preserve surviving shop and pub fronts of special historical or architectural interest including signage and associated features"</i>.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>vi) Submission suggests that a number of ancient boundary ditches some of which may have formed part of the Pale defenses in the County are added to the RPS.</p>	<p><b><u>B0114</u></b></p>		<p>The Executive notes the suggested addition to the RPS.</p> <p>The Pale Ditch is already listed in Appendix 4: Table 4.4 'Record of Monuments and Places' (RMP) - Map 9, DU026-115 and DU026-087 Classification: Linear Earthworks.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
vii) Submission requests that the old Victorian granite railway bridge at the mouth the Shanganagh River be included in the list for protection and conservation.	<b>B0630</b>	10	<p>The Executive notes the issue raised.</p> <p>The Dún Laoghaire-Rathdown Heritage Survey 2005-2006 records include this site as "Site No: 993", and describes it as a railway bridge, on a disused railway line at Shanganagh River.</p> <p>As per the Industrial Heritage Survey this structure (Site No. 993), rated as 'local'. The bridge is also described in the Inventory of Coastal Architecture of Dún Laoghaire-Rathdown, 2008.</p> <p>In this regard, it is recommended that the "old railway bridge at the mouth the Shanganagh River", be added to the Industrial Heritage Survey.</p> <p><b>Recommendation</b>  Amend Table 4.5 'Industrial Heritage Sites', Appendix 4 (p. 198) and Map 10 of the Draft Plan to include:</p> <ul style="list-style-type: none"> <li>• Railway Bridge on disused railway line at mouth of Shanganagh River.</li> </ul>
viii) Submission requests that a church building at Tivoli Terrace South Dún Laoghaire is added to the RPS.	<b>B1248</b>	3	<p>The Executive notes the suggested addition to the RPS.</p> <p>This is a late nineteenth century gothic chapel of red brick with granite dressing to the hood mouldings over the arched windows, granite quoins and cross-shaped granite finials to the roof. The building is considered to be of architectural and artistic interest and makes a positive contribution to the streetscape.</p> <p>Although an internal inspection of the property could not be facilitated, it would appear from an external inspection that the Church may meet one or more of the Categories of Special Interest as set out in Section 51(1) of the Planning and Development Act, 2000, (as amended). It is noted, however, that due to statutory timeframes in the Development Plan process, it is not possible to add new structures onto the Record of Protected Structures at this stage.</p> <p>There is conflict between two interrelated sections of the Planning and Development Act, 2000 (as amended), that being Section 12(3) which sets out, statutory timeframes for additions and/or deletions to the Record of Protected Structures, and Section 12(7) which sets out the statutory timeframes associated with the material alterations stage, that being the next stage of the County Development Plan-making process.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>Section 12(3) of the Act states:  <i>“(a) Where the draft includes any provision relating to any addition to or deletion from the record of protected structures, the planning authority shall serve on each person who is the owner or occupier of the proposed protected structure or the protected structure, as the case may be, a notice of the proposed addition or deletion, including the particulars.</i></p> <p><i>(b) A notice under paragraph (a) shall state—</i>  <i>(i) that a copy of the proposed addition or deletion may be inspected at a stated place or places and at stated times during a stated period of not less than 10 weeks (and the copy shall be kept available for inspection accordingly) ...”</i></p> <p>Section 12(7) of the Act in relation to the statutory timeframes for the material alterations stage states:  <i>“(ad) The notice referred to in paragraph (ac) shall state —(i) that a copy of the proposed material alteration and of any determination by the authority that an assessment referred to in paragraph (aa) is required may be inspected at a stated place or places and at stated times, and on the authority’s website during a stated period of not less than 4 weeks (and that copies shall be kept available for inspection accordingly) ...”</i></p> <p>Having sought a legal opinion on this matter, the Law Agent is of the opinion that owners/occupiers of properties proposed for inclusion in the RPS must receive the 10 week statutory notice as prescribed in Section 12(3). The appropriate legal mechanism to address this would be to vary the newly adopted Plan to include this structure under the provisions of Section 55 of the Planning and Development Act, 2000 (as amended).</p> <p><b>Recommendation</b>                      No change to Draft Plan.</p>
<b>3.19.1.2: Requested deletions from the RPS</b>			
ix) Submissions received both in support of and against the listing of Dunleary House, Old Dunleary Road (RPS No. 2131) onto the RPS. Those against argue that its inclusion is unwarranted and is not supported by any professional assessment.	<b><u>B0013</u></b> <b><u>B0408</u></b> <b><u>B0608</u></b> <b><u>B0613</u></b> <b><u>B0874</u></b>	3	The Executive notes that support provided, however, agrees that the structure should be removed from the Record of Protected Structures.

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<ul style="list-style-type: none"> <li>• Submission seeks the removal of SLO37 in addition to the removal from the RPS.</li> <li>• Notes that the building is in an ACA.</li> <li>• Submissions received in support of the addition:                             <ul style="list-style-type: none"> <li>• Requests that a curtilage is defined.</li> <li>• The building is retained as per the SLO.</li> <li>• Suggests that the structure could be restored to facilitate a number of uses including commercial - a restaurant or a niche retail unit, or for housing.</li> <li>• Notes its role in local history.</li> <li>• States that it could provide needed housing in the area.</li> </ul> </li> </ul>	<p><b><u>B1035</u></b>  <b><u>B1205</u></b>  <b><u>B1213</u></b>  <b><u>B1226</u></b></p>		<p>The Executive continues to hold the position as set out in the Chief Executive’s response to Agenda item 101 during the special County Development Plan meetings to make the Draft Plan, on the 18<sup>th</sup> December 2020.</p> <p>Reference is made in the submission to the site being a depot for Wallace Bros Coal Merchants in the mid-19th century. The site is not identified in the Industrial Heritage Survey of the County of being of any Industrial Heritage interest. Industrial interest is not one of the special interest criteria listed within the ‘Architectural Heritage Protection Guidelines for Planning Authorities’. It is therefore not considered that its use as regional depot for the distribution of coal to warrant its inclusion on the RPS.</p> <p>There may be an opportunity to provide a plaque in memorial of the 1916 Lockout event referred to in a submission, <b>this process however, is not a County Development Plan matter</b> rather this would be applied for under a separate process and would be reviewed having regard to Policy Objective HER27: ‘Civic Memorials’. There is no evidence to suggest that any event occurred within the house.</p> <p>The building in question is not considered to be of sufficient Architectural, Historical, Archaeological, Artistic, Cultural, Scientific, Social or Technical interest to merit inclusion onto the Record of Protected Structures. Section 2.5.16 of the Department of the Arts Heritage and the Gaeltacht, ‘Architectural Heritage Protection Guidelines for Planning Authorities’ states that social interest can be attributed to a structure which has become of spiritual, political and/or symbolic interest – such as a holy well, a memorial, a statue. It can also be attributed to structures illustrating the social philosophy of a past age, as in the case of philanthropic housing (i.e. Almshouses).</p> <p>The building is of relatively modest architectural merit and displays no external features of significant interest having been extensively refurbished in the past which has resulted in the loss of original windows, roof materials, and an extension that severely detracts from its appearance.</p> <p>The value of this building lies solely with its contribution to the streetscape in this regard SLO 37 which states: <i>“That Dunleary House (Yellow Brick House) and associated boundary be retained in situ and renovated and ensure its rehabilitation and suitable reuse of the building</i></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p><i>which makes a positive contribution to the character and appearance of the streetscape at this location” would retain the contribution of the structure within the streetscape. It is considered, however, that SLO37 is somewhat restrictive in nature and could be re-phrased in a manner that would allow for meaningful development of the house and wider site whilst maintaining the character along the street.</i></p> <p><b>The restoration and use of the structure is not a County Development Plan matter</b>, rather this would be considered through the development management process. It is noted that references to the building being within an ACA are incorrect. The building is adjacent to, but not located within, the proposed Vesey Place, De Vesci Terrace, and Willow Bank Architectural Conservation Area.</p> <p><b>Recommendation</b></p> <p>Amend Table 4.1: ‘Record of Protected Structures’, Appendix 4 in the Draft Plan and Map 3 of the Draft Plan to:</p> <ul style="list-style-type: none"> <li>• Delete Dun Leary House, RPS No. 2131 (p. 152)</li> </ul> <p>Amend SLO37, Map 3, Chapter 14 ‘Specific Local Objectives’ from: <i>“That Dunleary House (Yellow Brick House) and associated boundary be retained in situ and renovated and ensure its rehabilitation and suitable reuse of the building which makes a positive contribution to the character and appearance of the streetscape at this location”</i></p> <p>To:</p> <p><i>“That Dunleary House (Yellow Brick House) and associated boundary be <del>retained in situ and renovated and ensure its rehabilitation and suitable</del> <u>incorporated into any development of the site and suitably reuse of the building to reflect its</u> <del>which makes a positive contribution to the character and appearance of the streetscape at this location.”</del></i></p>
x) Submissions received both in favour and against the addition of Árd na Glaise, Stillorgan (RPS No. 2099) onto the RPS.	<b><u>B0033</u></b> <b><u>B0611</u></b>	2	The Executive notes the support provided and agrees with the addition of Árd na Glaise to the RPS.

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>Submission in favour of the addition has requested a plaque at the entrance.</p> <p>Submission against its addition:</p> <ul style="list-style-type: none"> <li>Provides an assessment having regard to the findings of 2 separate conservation reports and the Architectural Heritage Protection, Guidelines for Planning Authorities, 2011, concluding that there is no architectural, historical, archaeological, artistic, cultural, scientific, social or technical reason why the property should be listed on the RPS.</li> <li>Notes and details planning history on the site and conservation assessment / opinions contained therein and also references third party submissions from the pre-draft stage of the development plan process.</li> <li>States that the listing of the property onto the RPS by dlr did not take account of the conclusions of conservation assessments submitted with planning applications, give a justification for the listing as per the Guidelines and has not been subject to an assessment by the Council under the criteria set out in the Planning and Development Act, 2000.</li> </ul>			<p>A site visit, which included the interior of the building, was carried out by the Conservation Section on the 19<sup>th</sup> May 2021.</p> <p>A submission refers to two conservation reports that disagree with the Conservation Section's view that the building has any '<i>special interest</i>', which would warrant its inclusion on the Record of Protected Structures.</p> <p>The following is a systematic appraisal of the merits of the Árd na Glaise in accordance with Chapter 2 of the of the 'Architectural Heritage Protection Guidelines for Planning Authorities', 2011. This appraisal does not purport Árd na Glaise to be an exemplar of this type for the whole country rather, it is evaluated on its merits within the building stock of Dún Laoghaire-Rathdown. This appraisal lists those categories of special interest considered to be relevant to Árd na Glaise.</p> <p>When appraising buildings for addition to the RPS they are assessed under the criteria of special architectural, archaeological, historical, cultural, artistic, scientific, technical or social interest within the rankings of National, Regional or Local importance. In most circumstances additions to the RPS will be of Regional Importance or above, however buildings of local interest may be considered for inclusion on the RPS, provided the said structure meets one or more of the Categories of Special Interest in accordance with Section 51 (1) of the Planning &amp; Development Act, 2000, as per Section 2.5.3 of the 'Architectural Heritage Protection Guidelines for Planning Authorities', 2011.</p> <p><b>Architectural:</b> The guidelines state that the "<i>characteristics of architectural interest may be attributed to a structure or part of a structure with such qualities as the following:</i></p> <ol style="list-style-type: none"> <li>a generally agreed exemplar of good quality architectural design;</li> <li>the work of a known and distinguished architect, engineer, designer or craftsman;</li> <li>an exemplar of a building type, plan-form, style or styles of any period but also the harmonious interrelationship of differing styles within one structure;</li> <li>a structure which makes a positive contribution to its setting, such as a streetscape or a group of structures in an urban area, or the landscape in a rural area;</li> <li>a structure with an interior that is well designed, rich in decoration, complex or spatially pleasing."</li> </ol>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>Árd na Glaise is of architectural interest due to its Arts and Crafts style detailing in the form of overhanging eaves and barge boards, tall brick chimney stacks, brick walls with half-timber work to the gables of the principal and side elevations, projecting bay window to the front, decorative brick and timber entrance porch, original timber sliding sash windows and leaded lights. Internally the building retains much of its original architectural character, with architectural features such as joinery (dado rails, panelled doors with carved timber over-doors, window architraves), timber staircase with carved newel posts and turned balusters, elaborate timber fire surround and over-mantle.</p> <p>Árd na Glaise is therefore considered to be of special architectural interest.</p> <p><b>Artistic:</b> The guidelines state that <i>“special artistic interest may be attributed to a structure itself, or to a part of a structure, for its craftsmanship, design or decoration. Examples could include:</i></p> <ul style="list-style-type: none"> <li><i>a) examples of good craftsmanship;</i></li> <li><i>b) decoratively carved statuary or sculpture that is part of an architectural composition;</i></li> <li><i>c) decoratively-carved timber or ceramic-tiled shopfronts;</i></li> <li><i>d) ornate plasterwork ceilings;</i></li> <li><i>e) decorative wrought-iron gates;</i></li> <li><i>f) religious art in a place of public worship such as the Stations of the Cross or stained-glass windows;</i></li> <li><i>g) fixtures and fittings such as carved fireplaces, staircases or light-fittings;</i></li> <li><i>h) funerary monuments within a graveyard;</i></li> <li><i>i) the relationship of materials to each other and to the totality of the building in which they are situated, if these have been designed as an ensemble”.</i></li> </ul> <p>Árd na Glaise displays a richness of decoration including leaded light windows, decorative timber work to the entrance porch, decorative architraves to door and window surrounds, original timber doors and over-doors, carved timber staircase and decorative timber fire surround. The level of craftsmanship employed in Árd na Glaise warrants it to be considered of special artistic interest.</p> <p><b>Historical:</b></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>The guidelines states that the Historical interest of a structure may be due to its association with an event or an historic personality.</p> <p>Árd na Glaise was the residence of the Maurice Walsh, a literary author in Ireland, whose work spanned about sixty years. He lived at Árd na Glaise from 1934 and died in the house in 1964. Maurice Walsh is most famous for writing the short story 'The Quiet Man' which was adapted by John Ford to make the well-known Oscar winning film by the same name.</p> <p>Árd na Glaise is considered to be of Special Architectural, Artistic and Historical Interest. Any building that meets one or more of the Categories of Special interest should be added to the Record of Protected Structure in accordance with Section 51 (1) of the Planning &amp; Development Act, 2000 (as amended).</p> <p><b>The provision of a plaque at the entrance is not a County Development Plan matter</b> rather it is applied for under a separate process and would be reviewed having regard to Policy Objective HER27: 'Civic Memorials'.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xi) Submission requests that Saint Brigid's Catholic Church (RPS No. 2006) Johnstown Road, Cabinteely is removed from the RPS.</p> <p>It is noted that works have been carried out to the church and raises concern in relation to the ability to carry out future works.</p> <p>It is requested that individual elements of the Church, are protected rather than applying a blanket protection</p> <p>Note: A submission in relation to the presbytery is set out under B1258</p>	<b>B0058</b>	7	<p>The Executive notes the content of the submission.</p> <p>The NIAH formed the opinion that the Church is of archaeological, architectural, artistic, historical, scientific, social and technical interest and therefore met the criteria for inclusion onto the RPS. Any structure, which has one or more of the above categories of special interest, should be recommended for inclusion onto the RPS.</p> <p>The site was visited in as part of the County Development Plan Review on the 10<sup>th</sup> June 2020 to assess the merits of the building having regard to the recommendation of the NIAH. On foot of the submission, a follow-up inspection which included the interior of the building, was carried out by the Conservation Section on the 13<sup>th</sup> May 2021. The implications for 'listing' the Church and the options open to the owner such as a Section 57 Declaration and the opportunity to avail of conservation grants for the building, were discussed during the inspection.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>Having re-visited the site the Executive is in agreement with the Ministerial recommendation that the Saint Brigid’s Church is of architectural, artistic, social interest and therefore warrants inclusion onto the RPS. Saint Brigid’s Church along with the adjacent Presbytery form part of an assembly of ecclesiastical structures that contribute to the architectural character and streetscape of Cabinteely Village.</p> <p>Most historic buildings evolve over time and have been altered or extended. Conservation is the process of caring for buildings and places and of managing change to them in such a way to retain their character and special interest.</p> <p>As stated in the Architectural Heritage Protection Guidelines for Planning Authorities (AHPG’s) Chapter 7. Section 7.2.2 states <i>“Entry into the Record of Protected Structures does not mean that a structure is forever frozen in time. Good conservation practice allows a structure to evolve and adapt to meet changing needs while retaining its particular significance”</i>.</p> <p>The legislation provides that a Planning Authority shall respect Liturgical requirements as set out in Section 57(5)(6) of the Planning and Development Act, 2000 (as amended). In some instances Planning Permission may be required for works; in others, a Section 57 declaration may be obtained from the Planning Authority, which would define works that may be not require permission. For works considered exempted development they must not materially affect the Protected Structure.</p> <p>With regards to extensions to Protected Structures, Section 6.8.4 of the ‘Architectural Heritage Protection Guidelines for Planning Authorities’ states <i>“In general, modern extensions to a protected structure do not have protected status themselves unless they contribute to the character of the structure. Therefore works to such an extension which do not affect the character of the protected structure itself, for example to the interior of the extension, would come within the normal rules relating to exemptions”</i>.</p> <p>Section 2 of the Planning and Development Act, 2000 (as amended) defines the term, “structure”, part (b) of which relates to a “protected structure” which includes <i>“(iv) all fixtures and features which form part of the interior or exterior of the structure”</i>. With regards to the Church’s artistic interest, Section 2.5.12 of the Architectural Heritage Protection Guidelines for Planning authorities’ states <i>“For artistic work to get protection under the Act, its degree of</i></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p><i>annexation to the structure should be taken into account. If the work of art is effectively fixed to the structure, it can be considered a part of the structure and therefore protected".</i></p> <p>While it is possible to protect part of a building, Section 2.5.2 of the 'Architectural Heritage Protection Guidelines for Planning Authorities' advise that <i>"The protection of a façade alone should generally only be considered where there is no surviving interior of any interest, for example where the building has previously been gutted and the façade is the only remaining feature of the original historic building. Generally a façade relates integrally to its building, which may retain interior detail of note including, for example, the original spatial plan, shop-fittings or decorative elements such as chimneypieces, staircases, window shutters or cornices"</i>.</p> <p>The individual elements listed in the submission are integral to the character and significance of the Church, while the church also retains many other original features. To only list individual elements and not the entirety of the building is contrary to the guidelines as set out above.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xii) RPS no. 2046, Ard-na-Chree, Kerry Mount Ave, Foxrock should be removed from the RPS as it has been altered and extended over the past 44 years.</p>	<p><b>B0059</b></p>	<p>6</p>	<p>The Executive notes the issue raised.</p> <p>The NIAH formed the opinion that the building is of architectural and artistic interest and therefore met the criteria for inclusion onto the RPS. The site was visited as part of the County Development Plan review on the 25<sup>th</sup> May 2020 to assess the merits of the building having regard to the recommendation of the NIAH. On foot of the submission an attempt was made to access the property for a further inspection, however this could not be facilitated.</p> <p>The Executive considers the building to meet one or more of the Categories of Special Interest to warrant inclusion on the Record of Protected Structures (Architectural, Historical, Archaeological, Artistic, Cultural, Scientific, Social or Technical interest) in accordance with Section 51(1) of the Planning and Development Act, 2000 (as amended).</p> <p>The submission refers to alterations and extensions to the building. Most historic buildings evolve over time and have been altered or extended.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>With regards to extensions to Protected Structures, Section 6.8.4 of the "Architectural Heritage Protection Guidelines for Planning Authorities states <i>"In general, modern extensions to a protected structure do not have protected status themselves unless they contribute to the character of the structure. Therefore works to such an extension which do not affect the character of the protected structure itself, for example to the interior of the extension, would come within the normal rules relating to exemptions"</i>.</p> <p>The Planning Authority can issue a Section 57 Declaration to determine which elements/features of the interior are of interest and to clarify the type of works would be considered exempted development i.e. which would not require planning permission.</p> <p>The Executive agrees with the Ministerial recommendation to include Ard Na Chree onto the RPS.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xiii) Submission requests that The Ochra Gate Lodge, Thornhill Rd (RPS No. 1977) is removed from the RPS due to the cost implications of maintaining the building and wish to replace the building with a similar sized building built to modern standards. Submission considers that the property if not of great architectural or cultural significance</p>	<p><b>B0069</b></p>	<p>14</p>	<p>The Executive notes the issue raised.</p> <p>The NIAH formed the opinion that the building is of architectural interest and therefore met the criteria for inclusion onto the RPS. The site was visited as part of the County Development Plan review on the 25<sup>th</sup> May 2020 to assess the merits of the building having regard to the recommendation of the NIAH. On foot of the submission, a follow-up inspection, which included the interior of the building, was carried out by the Conservation Section on the 12<sup>th</sup> May 2021.</p> <p>Having re-visited the site the Executive acknowledges the interior of the building has been heavily altered with much loss of original fabric and character. In this instance the Conservation Section supports the Ministerial recommendation to include The Ochra Gate Lodge onto the RPS, however, only listing the exterior.</p> <p>Furthermore, the building has a historical association with the principle building The Ochra (RPS 1982), which is also proposed for inclusion onto the RPS by way of a Ministerial</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p><b>Recommendation</b> This relationship between the Gate lodge and the principle dwelling remains unchanged and this connection contributes to its special interest.</p> <p>The designation of a building as a Protected Structure does not prevent them from being renovated or extended subject to the proposal being sensitive to the elements that make the building significant. Many heritage buildings have been successfully retrofitted and repurposed without materially affecting the essential character of the building. As stated in the Architectural Heritage Protection Guidelines for Planning Authorities (AHPG's) Chapter 7. Section 7.2.2 states "Entry into the Record of Protected Structures does not mean that a structure is forever frozen in time. Good conservation practice allows a structure to evolve and adapt to meet changing needs while retaining its particular significance".</p> <p>It is noted that the submission received refers to the replacement of the structure in its entirety. Policy Objectives in the Draft Plan would encourage the retention of existing dwellings in favour of their replacement, including PHP19: 'Existing Housing Stock – Adaptation' in Chapter 4 which states "It is a Policy Objective to - Conserve and improve existing housing stock through supporting improvements and adaptation of homes ..."</p> <p><b>Recommendation</b> Amend the description of The Ochra RPS No. 1977, (p.181) Table 4.1: 'Record of Protected Structures', Appendix 4 in the Draft Plan from:</p> <p><i>"Gate Lodge"</i></p> <p>To</p> <p><i>"Gate Lodge (<u>exterior only</u>)"</i>.</p>
<p>xiv) Submission requests a review of Church of Saint Stephen, Killiney Hill Rd. (RPS No. 1636) and seek its removal from the RPS.</p> <p>Submission requests that items of interest, such as a stained-glass window and sanctuary furniture, are listed individually.</p>	<b>B0070</b>	4	<p>The Executive notes the issues raised.</p> <p>The Church of Saint Stephen has first listed for protection under List 2 as a 'Church' in the Dún Laoghaire Borough Plan 1998.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>On foot of the submission, a site visit was carried out by the Conservation Section on the 13<sup>th</sup> May 2021. It is noted that concerns are to do with falling congregation, costs associated with running the Church and lack of need for the church which has led to the building being closed.</p> <p>The Department of Arts, Culture and the Gaeltacht, Advice Series “Places of Worship, The Conservation of Places of Worship”, 2011 provides advice on the issues of “Redundancy” and “Reuse and change of use”. Generally the most suitable use for am church is as a place of worship, however the guidelines state that <i>“an alternative use, particularly one with a minimal physical impact, will usually be preferable to the building being left vacant and disused.”</i></p> <p>Saint Stephen’s Church is representative of a number of churches built in the Country in the 1980s to accommodate a mix of growing congregation and new suburban parishes. Of rather simple design the Church is an example of 21<sup>st</sup> Century church architecture, that is rare in Dún Laoghaire-Rathdown. The interior retains original fabric of reputable Irish artisan craft; these include a stained- glass window and sanctuary furniture. A building should only be removed from the RPS where the Planning Authority considers that the structure has entirely lost its special interest. In this instance, the Church of St Stephen continues to retain its architectural, artistic and social interest.</p> <p>The individual elements listed in the submission are integral to the character and significance of the Church.</p> <p>Section 2 of the Planning and Development Act, 2000 (as amended) defines the term, “structure”, part (b) of which relates to a “protected structure” which includes <i>“(iv) all fixtures and features which form part of the interior or exterior of the structure”</i>.</p> <p>With regard to the Church’s artistic interest, Section 2.5.12 of the Architectural Heritage Protection Guidelines for Planning authorities’ states <i>“For artistic work to get protection under the Act, its degree of annexation to the structure should be taken into account. If the work of art is effectively fixed to the structure, it can be considered a part of the structure and therefore protected”</i>.</p> <p>While it is possible to protect part of a building, Section 2.5.2 of the Architectural Heritage Protection Guidelines for Planning Authorities advise that <i>“The protection of a façade alone</i></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><i>should generally only be considered where there is no surviving interior of any interest, for example where the building has previously been gutted and the façade is the only remaining feature of the original historic building. Generally a façade relates integrally to its building, which may retain interior detail of note including, for example, the original spatial plan, shop-fittings or decorative elements such as chimneypieces, staircases, window shutters or cornices”.</i></p> <p>The stained glass window and sanctuary furniture were designed specifically for Saint Stephen’s Church and are integral to the character and significance of the Church. One cannot separate these elements from the church building in which they are housed. To only list individual elements and not the entirety of the building would be contrary to the guidelines as set out above.</p> <p>Notwithstanding the above, due to statutory timeframes in the Development Plan process, it is not possible to delete structures from the Record of Protected Structures at this stage.</p> <p>There is conflict between two interrelated sections of the Planning and Development Act, 2000 (as amended), that being Section 12(3) which sets out, statutory timeframes for additions and/or deletions to the Record of Protected Structures, and Section 12(7) which sets out the statutory timeframes associated with the material alterations stage, that being the next stage of the County Development Plan-making process.</p> <p>Section 12(3) of the Act states:  <i>“(a) Where the draft includes any provision relating to any addition to or deletion from the record of protected structures, the planning authority shall serve on each person who is the owner or occupier of the proposed protected structure or the protected structure, as the case may be, a notice of the proposed addition or deletion, including the particulars.</i></p> <p><i>(b) A notice under paragraph (a) shall state—</i>  <i>(i) that a copy of the proposed addition or deletion may be inspected at a stated place or places and at stated times during a stated period of not less than 10 weeks (and the copy shall be kept available for inspection accordingly)…”</i></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>Section 12(7) of the Act in relation to the statutory timeframes for the material alterations stage states:</p> <p><i>“(ad) The notice referred to in paragraph (ac) shall state —(i) that a copy of the proposed material alteration and of any determination by the authority that an assessment referred to in paragraph (aa) is required may be inspected at a stated place or places and at stated times, and on the authority’s website during a stated period of not less than 4 weeks (and that copies shall be kept available for inspection accordingly) ...”</i></p> <p>Having sought a legal opinion on this matter, the Law Agent is of the opinion that owners/occupiers of properties proposed for inclusion in or deletion from the RPS must receive the 10 week statutory notice as prescribed in Section 12(3).</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xv) Submission objects to the addition of The Gables, Westminster Court and Torquay Road, Foxrock (RPS No. 1961) to the RPS and requests that it be removed.</p> <p>Submission states that the owners were not notified in accordance with the Planning and Development Act, 2000 (as amended) and that the Foxrock ACA affords adequate protection to the character / exterior of the structure.</p>	<b>B0125</b>	6	<p>The Executive notes the issues raised.</p> <p>The NIAH formed the opinion that the building is of architectural and artistic interest and therefore met the criteria for inclusion onto the RPS. The site was visited as part of the County Development Plan review on the 4<sup>th</sup> March 2020 to assess the merits of the building having regard to the recommendation of the NIAH. On foot of the submission, a follow-up inspection, which included the interior of the building, was carried out by the Conservation Section on the 14<sup>th</sup> May 2021.</p> <p>Having re-visited the site the Executive acknowledges the building has been heavily refurbished internally with much loss of original fabric and character. The building holds a commanding presence within the village of Foxrock and its architectural expression and form contributes positively to the ACA. In this instance we support the Ministerial recommendation to include The Gables onto the RPS (exterior only)</p> <p><b>Recommendation</b> Amend description of The Gables RPS No. 1961, (p. 167) Table 4.1: ‘Record of Protected Structures’, Appendix 4 in the Draft Plan from:</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p><i>"Building"</i></p> <p>To:</p> <p><i>"Building (exterior only)"</i>.</p>
<p>xvi) Submission opposes the addition of Eglinton Lodge, RPS No.2094, to the RPS. No historical, family or architectural interest has been identified and the listed would place result in an onerous burden with financial implications.</p>	<p><b>B0129</b></p>	<p>1</p>	<p>The Executive notes the issues raised.</p> <p>On foot of the submission an attempt was made to access the property for an inspection, however this could not be facilitated.</p> <p>The Executive considers the building to meet one or more of the Categories of Special Interest to warrant inclusion on the Record of Protected Structures (Architectural, Historical, Archaeological, Artistic, Cultural, Scientific, Social or Technical interest) in accordance with Section 51(1) of the Planning and Development Act, 2000, (as amended).</p> <p>The building is a fine example of a detached, gabled fronted Victorian house. The use of brick, polychromatic string courses and granite dressings are characteristic of buildings within Dundrum and contributes to the built heritage of the area. The composition of the building remains intact and much of the salient features survive such as decorative bargeboards, asymmetrical timber sash windows and imposing decorative brick chimneystacks.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xvii) Submission objects to the addition of Ivy Grove, Eglinton Terrace (RPS No. 2092) onto the RPS.</p>	<p><b>B0196</b></p>	<p>1</p>	<p>The Executive notes the issues.</p> <p>On foot of the submission the Conservation Section inspected the property on 3<sup>rd</sup> June 2021 and continues to support the inclusion of Ivy grove onto the RPS.</p> <p>The Executive considers the building to meet one or more of the Categories of Special Interest to warrant inclusion on the Record of Protected Structures (Architectural, Historical, Archaeological, Artistic, Cultural, Scientific, Social or Technical interest) in accordance with Section 51(1) of the Planning and Development Act, 2000, (as amended).</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>Ivy Grove is one of a pair of attractive semi-detached houses with H-plan and projecting canted-bay window to gabled front. The external composition retains much of its original character and contributes positively to the streetscape character. The building is simply finished with unpainted rough-render, painted cills and reveals to window openings framing timber sash windows. Decorative door surround with transom over encloses painted timber panelled entrance door.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xviii) Submission requests that Jamestown House, Enniskerry Rd (RPS No. 2043) is removed from the RPS.</p> <p>Submission notes inaccuracies in the building description set out in the NIAH, there have been many extensions to the property and that the house has no architectural character or significance.</p>	<b>B0197</b>	9	<p>The Executive notes the issues raised.</p> <p>Jamestown House was recently granted permission under Reg. Ref. D19A/0659 for alterations and extensions to the original structure. The application was assessed having regard to the NIAH survey record, with revisions sought to ensure the architectural character would not be compromised.</p> <p>The Executive considers the architectural interest of this building relates solely to its external appearance and form. In this instance therefore, the RPS designation should be applied to the exterior of the three-bay, two-storey original portion of the building only.</p> <p>The submission refers to inaccuracies in the NIAH record. The NIAH is keen that their records in the Building Survey are as accurate as possible and, to that end, include a "<i>Suggest an amendment to this record</i>" as a new feature of the new NIAH website in early 2020, <a href="http://www.buildingsofireland.ie">www.buildingsofireland.ie</a>. Users can therefore send corrections or new information directly to the NIAH. <b>It is beyond the remit of the Draft Plan to alter records held by a third party.</b></p> <p><b>Recommendation</b> Amend description of Jamestown House RPS No. 2043, (p. 176) Table 4.1: 'Record of Protected Structures', Appendix 4 in the Draft Plan from</p> <p><i>"House"</i></p> <p>To:</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>xix) Submission objects to the addition of Beauchamp Lodge (RPS No. 2042) to the RPS. It is not considered to have special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest.</p>	<p><b>B0318</b></p>	<p>14</p>	<p><i>“House (exterior only)”</i>.</p> <p>The Executive notes the issue raised.</p> <p>Despite the building being vacant at the time of the inspection, the NIAH formed the opinion that the gate lodge was of architectural interest and was also of interest due to its association with the nearby principle dwelling of Beauchamp which is already on the Record of Protected Structures, RPS No. 1862.</p> <p>The site was visited as part of the County Development Plan review on the 12<sup>th</sup> June 2020, to assess the merits of the building having regard to the recommendation of the NIAH. At this time it was clear that the building had been sympathetically refurbished, and the works had been carried out without comprising the original character or appearance of the building. On foot of the submission, a follow-up inspection, which included the interior of the building, was carried out by the Conservation Section on the 24<sup>th</sup> May 2021.</p> <p>Having re-visited the site the Executive acknowledges the interior of the building has been heavily altered with much loss of original fabric and character, and the original structure has been extended to the side and rear on foot of planning permission. In this instance we support the inclusion of the building onto the RPS (exterior only).</p> <p>The gate lodge has a historical association with the principle building Beauchamp which is a designated Protected Structure (RPS 1862). The historical connection between the gate lodge and the principle dwelling contributes to its special interest.</p> <p><b>Recommendation</b>  Amend description of Beauchamp Lodge RPS No. 2042, (p.180) Table 4.1: ‘Record of Protected Structures’, Appendix 4 in the Draft Plan from:</p> <p><i>“House”</i></p> <p>To:</p> <p><i>“House (exterior only)”</i></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>xx) Submission states that the property owners do not consent to having Overton, Kilmacud Road Upper (RPS No. 2126) listed on the RPS and request that it is removed. Submission raises concerns in relation to financial implications, legal obligations and invasion of privacy associated protecting the structure.</p>	<b>B0354</b>	1	<p><b>Amend Map 14 of the Draft Plan to depict the footprint of the original building only.</b></p> <p>The Executive notes the issue raised.</p> <p>On foot of the submission an attempt was made to access the property for a further inspection, however this could not be facilitated</p> <p>The Executive considers the building to meet one or more of the Categories of Special Interest to warrant inclusion on the Record of Protected Structures (Architectural, Historical, Archaeological, Artistic, Cultural, Scientific, Social or Technical interest) in accordance with Section 51(1) of the Planning and Development Act, 2000, (as amended).</p> <p>The Planning Authority can issue a Section 57 Declaration to determine which elements/features of the interior are of interest and to clarify the type of works would be considered exempted development i.e. which would not require planning permission.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xxi) Submission queries the basis for adding Coolgreen, Brennanstown Road (RPS No. 2050) to the RPS – it was home to Sir Edward O'Farrell who was not a figure of historic or literary importance and there is no evidence that the property is an Orpen-designed home.</p>	<b>B0357</b>	9	<p>The Chief Executive notes the issue raised</p> <p>The NIAH formed the opinion that this structure was of architectural, artistic, historical and social interest. Any structure, which has one or more of the above categories of special interest, should be recommended for inclusion onto the RPS. The site was visited as part of the County Development Plan review on the 18<sup>th</sup> June 2020 to assess the merits of the building having regard to the recommendation of the NIAH.</p> <p>On foot of the submission, a follow-up inspection which included the interior of the building was carried out by the Conservation Section on the 18<sup>th</sup> May 2021. Having re-visited the site the Executive continues to support the inclusion of the building onto the RPS. The building has been carefully and respectfully restored and remains of sufficient merit to warrant its inclusion onto the RPS</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>xxii) Submission seeks the removal of 11 Avoca Avenue, Blackrock (RPS No. 425) from the RPS as the property has been completely refurbished and there is little of the original structure remaining.</p>	<p><b>B0454</b></p>	<p>2</p>	<p>The Executive notes the content of this submission.</p> <p>On foot of the submission an attempt was made to access the property for a further inspection, however this could not be facilitated</p> <p>No.11 Avoca Avenue first appeared on the 1991 Borough Plan known as “Headfort Cottage”.</p> <p>A building should only be removed from the RPS where the Planning Authority considers that the structure has entirely lost its special interest. This is one of a pair of single-storey over basement Villa-style houses, with double-pile roof and shared chimneystack to party wall with neighbour and one to the gable. While the exterior has been modified with the removal of the render, the building retains its architectural form and expression and contributes positively to the streetscape character. Its boundary is enclosed by decorative wrought-iron railings with intersecting loop-headed panels surmounted on a granite plinth course. 11 Avoca Avenue is considered to warrant its inclusion on the RPS.</p> <p>The Planning Authority can issue a Section 57 Declaration to determine which elements/features of the interior are of interest and to clarify the type of works would be considered exempted development i.e. which would not require planning permission.</p> <p>In addition to the above, due to statutory timeframes in the Development Plan process, it is not possible to delete structures from the Record of Protected Structures at this stage.</p> <p>There is conflict between two interrelated sections of the Planning and Development Act, 2000 (as amended), that being Section 12(3) which sets out, statutory timeframes for additions and/or deletions to the Record of Protected Structures, and Section 12(7) which sets out the statutory timeframes associated with the material alterations stage, that being the next stage of the County Development Plan-making process.</p> <p>Section 12(3) of the Act states:  <i>“(a) Where the draft includes any provision relating to any addition to or deletion from the record of protected structures, the planning authority shall serve on each person who is the owner or occupier of the proposed protected structure or the protected structure, as the case may be, a notice of the proposed addition or deletion, including the particulars.</i></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><i>(b) A notice under paragraph (a) shall state—</i>  <i>(i) that a copy of the proposed addition or deletion may be inspected at a stated place or places and at stated times during a stated period of not less than 10 weeks (and the copy shall be kept available for inspection accordingly)”</i></p> <p>Section 12(7) of the Act in relation to the statutory timeframes for the material alterations stage states:</p> <p><i>“(ad) The notice referred to in paragraph (ac) shall state —(i) that a copy of the proposed material alteration and of any determination by the authority that an assessment referred to in paragraph (aa) is required may be inspected at a stated place or places and at stated times, and on the authority’s website during a stated period of not less than 4 weeks (and that copies shall be kept available for inspection accordingly) ...”</i></p> <p>Having sought a legal opinion on this matter, the Law Agent is of the opinion that owners/occupiers of properties proposed for inclusion in or deletion from the RPS must receive the 10 week statutory notice as prescribed in Section 12(3).</p> <p><b>Recommendation</b>                      No change to Draft Plan.</p>
<p>xxiii) Submission requests that Bella Vista, Deans Grange Road (RPS No. 2037) be removed from the RPS until such time that the Local Authority assess the property and requests that the NIAH record is amended. It is considered that the structure has no elements or features that are ‘special’ or of any particular significance and that the ‘regional’ rating is incorrect.</p> <p>Placing the property onto the RPS places onerous requirements on the householder and future refurbishment works would be more complex and</p>	<p><b><u>B0561</u></b>  <b><u>B0827</u></b>  <b><u>B1208</u></b></p>	<p>2</p>	<p>The Executive notes the issues raised.</p> <p>The NIAH formed the opinion that the building is of architectural, artistic, historical and social interest and therefore met the criteria for inclusion onto the RPS. The site was visited in advance of the Review of the County Development Plan on the 11<sup>th</sup> December 2019 to assess the merits of the building having regard to the recommendation of the NIAH. On foot of the submission, a follow-up inspection which included the interior of the building, was carried out by the Conservation Section on the 27<sup>th</sup> May 2021.</p> <p>Having re-visited the site the Executive acknowledges the building has been refurbished and remodelled internally. However, the building retains much of the original fabric and has been restored sympathetically. It is of sufficient quality and standard to meet the requirements for inclusion onto the RPS.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>costly. There are policies in the plan that provide protections for older buildings.</p>			<p>The Executive remains in agreement with the Ministerial recommendation that the dwelling warrants inclusion on the RPS.</p> <p>The Planning Authority can issue a Section 57 Declaration to determine which elements/features of the interior are of interest and to clarify the type of works would be considered exempted development i.e. which would not require planning permission.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xxiv) Submission requests that Ardmeen House (RPS No. 2058) and Ardmeen Gateway (RPS No. 2068) are removed from the RPS. Submissions further state:</p> <ul style="list-style-type: none"> <li>● The NIAH rating is questioned.</li> <li>● It is cited that the property does not have sufficient merit for inclusion onto the RPS and its inclusion would place onerous conditions on future works and devalue the property. Affordability of maintenance is a concern.</li> <li>● Submission states that the access to the property is not original and does not warrant its own mention in the RPS.</li> <li>● The composition of the property is noted including that it is partially rented at affordable rates which may increase if listed.</li> </ul>	<p><b><u>B0676</u></b> <b><u>B0893</u></b> <b><u>B1184</u></b> <b><u>B1253</u></b></p>	<p>6</p>	<p>The Executive notes the issues raised.</p> <p>The NIAH formed the opinion that the building is of architectural, artistic, historical and social interest and therefore met the criteria for inclusion onto the RPS. The site was visited as part of the County Development Plan review on the 11<sup>th</sup> February 2020 to assess the merits of the building having regard to the recommendation of the NIAH. On foot of the submission, a follow-up inspection which included the interior of the building, was carried out by the Conservation Section on the 17<sup>th</sup> May 2021.</p> <p>Having re-visited the site it is evident that the building has been altered and adapted internally over the years. The building has evolved over time and the Conservation Section considers the different periods of its evolution serve to inform the social and architectural history of the building.</p> <p>Despite this it retains much of its original charm and character with architectural features such as plasterwork, joinery (including shutters, picture rails, panelled doors and architraves, internal overlights with coloured glass), and original timber flooring surviving. The Executive remains in agreement with the Ministerial recommendation that the dwelling warrants inclusion on the RPS.</p> <p>The Planning Authority can issue a Section 57 Declaration to determine which elements/features of the interior are of interest and to clarify the type of works would be considered exempted development i.e. which would not require planning permission.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>In relation to the gateway, the historic entrance gates are shown correctly on Map 6 of the Draft Plan. We acknowledge the description is incorrect when referring to Ardmeen. These gates now serve Belclare and not Ardmeen. The existing modern entrance gates to Ardmeen are not proposed to be added to the RPS.</p> <p><b>Recommendation</b> Amend structure name of the gateway, RPS No. 2068, (p.170) Table 4.1: 'Record of Protected Structures', Appendix 4 in the Draft Plan from:</p> <p><i>"Ardmeen"</i></p> <p>To:</p> <p><i>"Belclare (Former gateway to Ardmeen)"</i>.</p>
xxv) Submission requests that 7 Old Dun Leary Road is removed from the RPS.	<b>B0681</b>	3	<p>The Executive notes the issue raised.</p> <p>This property is not listed on the RPS nor is it proposed to add same to the RPS</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
xxvi) Submission requests that the 'Original Drawing Room (RPS No. 171) at Chesterfield House, Cross Avenue is removed from RPS as it has been modified and has low architectural merit.	<b>B0805</b>	2	<p>The Executive notes the issue raised.</p> <p>Chesterfield was first listed for protection under List 2 as a 'House' in the Dún Laoghaire Borough Plan 1991. Following representations, the entry was amended to <i>"Original Drawing Room"</i>, as part of the review and adoption of the County Development Plan 2004-2010.</p> <p>It is acknowledged that a number of insensitive intrusions into the building fabric have occurred, however, there is sufficient quality remaining to require the retention of the Original Drawing Room on the RPS. A structure or part of a structure should only be removed from the RPS where the Planning Authority considers that it has entirely lost its special interest</p> <p>In addition to the above, due to statutory timeframes in the Development Plan process, it is not possible to delete structures from the Record of Protected Structures at this stage. There</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>is conflict between two interrelated sections of the Planning and Development Act, 2000 (as amended), that being Section 12(3) which sets out, statutory timeframes for additions and/or deletions to the Record of Protected Structures, and Section 12(7) which sets out the statutory timeframes associated with the material alterations stage, that being the next stage of the County Development Plan-making process.</p> <p>Section 12(3) of the Act states:  <i>“(a) Where the draft includes any provision relating to any addition to or deletion from the record of protected structures, the planning authority shall serve on each person who is the owner or occupier of the proposed protected structure or the protected structure, as the case may be, a notice of the proposed addition or deletion, including the particulars.</i></p> <p><i>(b) A notice under paragraph (a) shall state—</i>  <i>(i) that a copy of the proposed addition or deletion may be inspected at a stated place or places and at stated times during a stated period of not less than 10 weeks (and the copy shall be kept available for inspection accordingly) ...”</i></p> <p>Section 12(7) of the Act in relation to the statutory timeframes for the material alterations stage states:  <i>“(ad) The notice referred to in paragraph (ac) shall state —(i) that a copy of the proposed material alteration and of any determination by the authority that an assessment referred to in paragraph (aa) is required may be inspected at a stated place or places and at stated times, and on the authority’s website during a stated period of not less than 4 weeks (and that copies shall be kept available for inspection accordingly) ...”</i></p> <p>Having sought a legal opinion on this matter, the Law Agent is of the opinion that owners/occupiers of properties proposed for inclusion to or deletion from the RPS must receive the 10 week statutory notice as prescribed in Section 12(3).</p> <p><b>Recommendation</b>                      No change to Draft Plan.</p>
xxvii) Submission does not consider there to be a need to have the private burial ground (RPS No.	<b>B0833</b>	10	The Executive notes the content of the submission.

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
2066) listed on the RPS as it can never change its use as private family burial ground. Concern has been raised that a S.57 application would be required every time that a burial takes place.			<p>The addition of the burial ground onto the RPS is to ensure that any existing monuments and grave markers are retained.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
xxviii) Submission requests that Mangerton, Westminster Road (RPS No. 2051) is removed from the RPS. The property has no elements or features of any significance or interest and the location within the ACA provides sufficient protection. Submission considers that the NIAH 'regional' rating is incorrect.	<b>B0968</b>	6	<p>The Executive notes the issue raised.</p> <p>The NIAH formed the opinion that the building is of architectural, artistic, historical and social interest and therefore met the criteria for inclusion onto the RPS. The site was visited as part of the County Development Plan review on the 11<sup>th</sup> June 2020 to assess the merits of the building having regard to the recommendation of the NIAH. On foot of the submission, a follow-up inspection which included the interior of the building, was carried out by the Conservation Section on the 2<sup>nd</sup> June 2021.</p> <p>Having re-visited the site the Executive acknowledges the building has been subject to extensions to the rear which have compromised the original expression and form of the building. The interior of the building has been refurbished and while retaining some features of architectural interest, it is not an exemplar of its type. While Mangerton is a perfectly pleasant early twentieth century house the Executive considers the building to be sufficiently protected within the Foxrock ACA.</p> <p><b>Recommendation</b> Amend Table 4.1: 'Record of Protected Structures', Appendix 4 (p. 175) and Map 6 of in the Draft Plan to:</p> <ul style="list-style-type: none"> <li>• Delete the structure "Mangerton" Description "House" RPS "2051".</li> </ul>
xxix) Submission requests that Hillside, Glenamuck Road (RPS No. 2020) is removed from the RPS. The property has no elements or features of any significance or interest and there are a number of inaccuracies in the NIAH record. Submission considers that the NIAH 'regional' rating is incorrect.	<b>B0973</b>	9	<p>The Executive notes the issue raised.</p> <p>The NIAH formed the opinion that the building is of architectural, artistic, historical and social interest and therefore met the criteria for inclusion onto the RPS. The site was visited as part of the County Development Plan review on the 11<sup>th</sup> June 2020 to assess the merits of the building having regard to the recommendation of the NIAH. On foot of the submission, a follow-up inspection, which included the interior of the building, was carried out by the Conservation Section on the 2<sup>nd</sup> June 2021.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>Having revisited the site the Executive notes the building has been refurbished in a sensitive manner which has not detracted from the architectural form and expression of the building externally. Internally the building retains some elements of original fabric which are of interest and contribute to the character and significance of the building. The Executive remains in agreement with the Ministerial <b>Recommendation</b> that Hillside warrants inclusion on the RPS.</p> <p>The submission refers to a number of inaccuracies in the NIAH record. The NIAH is keen that the records in the Building Survey are as accurate as possible and, to that end, included <i>"Suggest an amendment to this record"</i> as a new feature of the new NIAH website in early 2020, <a href="http://www.buildingsofireland.ie">www.buildingsofireland.ie</a>. Users can send corrections or new information directly to the attention of the NIAH. <b>It is beyond the remit of the Draft Plan to alter records held by a third party.</b></p> <p>As per Section 12(3)(iv) of the Planning and Development Act, 2000 (as amended), all submissions/observations received with regard to a structure added to the RPS on foot of a Ministerial recommendation, were forwarded to the Minister for comment. The Minister did not make any observations on same</p> <p><b>Recommendation</b> No change to Draft Plan</p>
xxx) Submission requests that Clayfarm, Kilgobbin Road (RPS No. 2119) is removed from the RPS. The property has no elements or features of any significance or interest and there are a number of inaccuracies in the NIAH record. Submission considers that the NIAH 'regional' rating is incorrect.	<b><u>B0979</u></b>	9	<p>The Executive notes the issue raised.</p> <p>The NIAH formed the opinion that the building is of architectural, artistic, historical and social interest and therefore met the criteria for inclusion onto the RPS.</p> <p>The site was visited as part of the County Development Plan review on the 26<sup>th</sup> June 2020 to assess the merits of the building having regard to the recommendation of the NIAH. On foot of the submission, a follow-up inspection, which included the interior of the building, was carried out by the Conservation Section on the 2<sup>nd</sup> June 2021.</p> <p>Accessed through a pair of original granite gate piers and cast-iron gates, the dwelling retains many original features both externally and internally including, entrance porch, internal plan form, original carved timber staircase, timber two-over-two sliding sash windows, and</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>associated box architraves, shutters and shutter boxes internally, timber door architraves and panelled doors and chimney pieces. There are other ancillary features of interest within the site, including courtyard of out-buildings to the rear, stone boundary walls, and various types of gates, which contribute to the agricultural heritage character of the former farm house.</p> <p>Having revisited the site the Executive remains in agreement with the Ministerial <b>Recommendation</b> that Clayfarm warrants inclusion on the RPS.</p> <p>The submission refers to a number of inaccuracies in the NIAH record. The NIAH is keen that the records in the Building Survey are as accurate as possible and, to that end, included <i>"Suggest an amendment to this record"</i> as a new feature of the new NIAH website in early 2020, <a href="http://www.buildingsofireland.ie">www.buildingsofireland.ie</a>. Users can send corrections or new information directly to the attention of the NIAH. <b>It is beyond the remit of the Draft Plan to alter records held by a third party.</b></p> <p>As per Section 12(3)(iv) of the Planning and Development Act, 2000 (as amended), all submissions/observations received with regard to a structure added to the RPS on foot of a Ministerial recommendation, were forwarded to the Minister for comment. The Minister did not make any observations on same</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xxxi) Submission requests the remove the barrel-vaulted building (RPS No. 1963) at Leopardstown Park Hospital, from RPS. Submission considers the NIAH rating to be incorrect and states the building is already afforded protection being located within the curtilage of existing protected structures, the house (RPS No.1634) and the Stables (RPS No. 1630)</p>	<p><b>B1004</b></p>	<p>6</p>	<p>The Chief Executive notes the issue raised.</p> <p>The NIAH formed the opinion that the building is of architectural and technical interest and therefore met the criteria for inclusion onto the RPS. The site was visited as part of the County Development Plan review on the 18<sup>th</sup> June 2020 to assess the merits of the building having regard to the recommendation of the NIAH.</p> <p>The submission includes a report by a Grade 1, Conservation Architect which provides a detailed history and analysis of the building. According to research the existing structure was as former hay shed, later converted to quarters for disabled soldiers, around 1919/20. On foot of the submission, a follow-up inspection, which included the interior of the building, was carried out by the Conservation Section on the 28<sup>th</sup> May 2021.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>Having reviewed the submission and re-visited the site, it is evident that the existing structure is of little architectural interest. Extensive works have been carried out in later years including, re-plastering of the building, removing entrance porches, insertion of chimney stacks, altering the internal layout with modern partitions and the insertion of a false ceiling hiding the roof trusses. It is apparent that this structure has undergone substantial alteration both internally and externally. With so much alterations having taken place it is no longer deemed to merit inclusion on the RPS.</p> <p>The structure is located to the rear of the principal structure on the site, Leopardstown Park Hospital (RPS No. 1634) which is included in the County Development Plan 2016-2022 and the Draft Plan. A former country house dated 1795-1800, it is now used as offices for the surrounding hospital. The submission asserts that the building is afforded protection as it is located within the curtilage of an existing protected structure.</p> <p>The subject of curtilage is addressed in Chapter 13: Curtilage and Attendant grounds of the “Architectural Heritage Protection Guidelines for Planning Authorities” 2011. Section 13.1.5 sets out three areas that should be considered by the planning authority in making a decision as to the extent of the curtilage of a protected structure; these relate to functional connections (for example, was the structure constructed to serve the main building, such as coach-house, stores etc., was there a historical relationship with the main structure and finally are the structures in the same ownership? Were they previously in the same ownership, for example at the time of their construction?</p> <p>In this case, the original use of the building as a ‘Hay Shed’ satisfies the criteria of having a functional connection with the protected structure. The structure has a historical relationship with the former country house known as Leopardstown and was also in the same ownership at the time of its construction. Having regard to the above it is therefore considered that this structure lies within the curtilage of an existing protected structure.</p> <p><b>Recommendation</b>  Amend Table 4.1: ‘Record of Protected Structures’, Appendix 4 (p. 169) and Map 6 of in the Draft Plan to:</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
xxxii) Submission objects to the addition of Emerald, Ballybride Road (RPS No. 1973) to the RPS due to the implications of modernising the building. There would be no objections to the protection of the exterior only.	<b>B1033</b> <b>B1221</b>	10	<ul style="list-style-type: none"> <li>• delete "Leopardstown Park" – Description: "Hospital", RPS No.1963".</li> </ul> <p>The Executive notes the issue raised.</p> <p>The NIAH formed the opinion that the building is of architectural, artistic, historical and social interest and therefore met the criteria for inclusion onto the RPS. The site was visited as part of the County Development Plan review on the 16<sup>th</sup> June 2020 to assess the merits of the building having regard to the recommendation of the NIAH.</p> <p>The submission suggests they would have no objection to the exterior only being protected. While it is possible to protect part of a building, Section 2.5.2 of the Architectural Heritage Protection Guidelines for Planning Authorities advise that <i>"The protection of a façade alone should generally only be considered where there is no surviving interior of any interest, for example where the building has previously been gutted and the façade is the only remaining feature of the original historic building. Generally a façade relates integrally to its building, which may retain interior detail of note including, for example, the original spatial plan, shop-fittings or decorative elements such as chimneypieces, staircases, window shutters or cornices"</i>.</p> <p>On foot of the submission, a follow-up inspection, which included the interior of the building, was carried out by the Conservation Section on the 25<sup>th</sup> May 2021. Having re-visited the site the Executive continues to support the inclusion of the dwelling onto the RPS. While some changes and alterations have taken place, much of the original architectural character associated with the Arts and Crafts style remains including, original timber flooring, staircase, joinery including panelled doors and door furniture, timber and leaded light windows with original ironmongery.</p> <p>With regards to carrying out works to 'modernise' the building. The designation of a building as a Protected Structure does not prevent it from being renovated or extended subject to the proposal being sensitive to the elements that make the building significant. Many heritage buildings have been successfully retrofitted and repurposed without materially affecting the essential character of the building.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>xxxiii) Submission requests that Ingleside, Brennanstown Road (RPS No. 2029) is removed from the RPS. The property has no elements or features of any significance or interest and there are a number of inaccuracies in the NIAH record. Submission considers that the NIAH 'regional' rating is incorrect.</p>	<b>B1086</b>	9	<p>The Executive notes the issues raised.</p> <p>The NIAH formed the opinion that the building is of architectural and artistic and therefore met the criteria for inclusion onto the RPS. The site was visited as part of the County Development Plan review on the 11<sup>th</sup> June 2020 to assess the merits of the building having regard to the recommendation of the NIAH. On foot of the submission a follow-up inspection, which included the interior of the building, was carried out by the Conservation Section on the 27<sup>th</sup> May 2021.</p> <p>Having re-visited the site the Executive acknowledges the building has been subject to extensions to the front and side elevations which have compromised the original expression and form of the building. The original portion of the building is arguably undiscernible. The interior of the building has been refurbished and while retaining some features of architectural interest, it is not an exemplar of its type.</p> <p><b>Recommendation</b> Amend Table 4.1: 'Record of Protected Structures', Appendix 4 (p. 176) and Map 9 of in the Draft Plan to:</p> <ul style="list-style-type: none"> <li>• Delete the structure "Ingleside" Description "House", RPS No. 2029.</li> </ul>
<p>xxxiv) Submission raises concerns with regard to the addition 'The Cedars' building (formerly 'Belville') at the National Rehabilitation Hospital (RPS No. 1969) to the RPS. It is considered that what remains of the original building fails to meet the relevant criteria for entry onto the RPS.</p> <p>Submission notes that the listing of this structure raises serious difficulties for future planning applications for Phase 2 and Phase 3 of the NRH masterplan redevelopment project and requests that it be removed from the RPS.</p>	<b>B1135</b>	7	<p>The Executive notes the issue raised.</p> <p>The NIAH formed the opinion that the building is of architectural, artistic, historical, and social interest and therefore met the criteria for inclusion onto the RPS. The site was visited as part of the County Development Plan review on the 8<sup>th</sup> June 2020 to assess the merits of the building having regard to the recommendation of the NIAH.</p> <p>The submission includes a comprehensive report by a Grade 1, Conservation Architect which provides a detailed history and analysis of the building. On foot of the submission a follow-up inspection, which included the interior of the building, was carried out by the Conservation Section on the 19<sup>th</sup> May 2021.</p> <p>Having reviewed the submission and re-visited the site, it is evident that the original 1830's house has been heavily altered, much of which can be attributed to the development of the</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>hospital during the early to mid 20<sup>th</sup> century. This has resulted in the loss of most of original fabric and character, with the exception of some plasterwork, internal window architraves at first floor level and an inlaid timber floor in the entrance hall.</p> <p>Some of main interventions that have occurred to the building, include:</p> <ul style="list-style-type: none"> <li>• Removal/replacement of fundamental original features including the vaulted rooms to the basement, staircase, porch, plasterwork, joinery.</li> <li>• Roof –the original roof structure has been altered, and the chimney stacks have been subdued, in recent years the natural slate roof has been painted with reflective paint.</li> <li>• Windows – replaced by uPVC casement windows - this also included the removal of most of the box frames and associate architraves internally.</li> <li>• Porch – of the original porch, only the wrought iron railing protecting the balcony at first floor level and the top five steps and landing have survived, both being removed from the original and reinstated in the later replacement.</li> <li>• Internally – the internal layout has been considerably altered during the 20<sup>th</sup> century as the Chapel and hospital buildings were added either side and the house was incorporated in the varied function of the new use. Rooms were subdivided to form offices and corridors to connect the three buildings were formed.</li> </ul> <p>Having revisited the site and carried out a full interior inspection it is apparent that this structure has undergone substantial alteration both internally and externally. With so much alterations having taken place it is no longer deemed to merit inclusion on the RPS.</p> <p><b>Recommendation</b> Amend Table 4.1: ‘Record of Protected Structures’, Appendix 4 (p. 174) and Map 7 of in the Draft Plan to:</p> <ul style="list-style-type: none"> <li>• delete “National Rehabilitation Hospital, Description: “House/Hospital”, RPS No.1969”</li> </ul>
<p>xxxv) Submission notes that the inclusion of ‘Rosefield’, Kerrymount Avenue (RPS No: 1965), in the RPS is unwarranted as the property has had significant moderations with no remaining historic architectural character.</p>	<p><b>B1210</b></p>	<p>6</p>	<p>The Executive notes the issues raised.</p> <p>The NIAH formed the opinion that the building is of architectural and artistic interest and therefore met the criteria for inclusion onto the RPS. The site was visited as part of the County Development Plan review on the 11<sup>th</sup> June 2020 to assess the merits of the building having</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>regard to the recommendation of the NIAH. On foot of the submission a follow-up inspection, which included the interior of the building, was carried out by the Conservation Section on the 25<sup>th</sup> May 2021.</p> <p>Having re-visited the site the Executive acknowledges the building has been subject to extensions to the rear which have compromised the original expression and form of the building. The interior of the building has been refurbished and while retaining some features of architectural interest, it is not an exemplar of its type. While Rosefield is a perfectly pleasant early twentieth century house the Executive considers the building to be sufficiently protected within the Foxrock ACA.</p> <p><b>Recommendation</b> Amend Table 4.1: ‘Record of Protected Structures’, Appendix 4 (p. 169) and Map 6 of in the Draft Plan to:</p> <ul style="list-style-type: none"> <li>• delete “Rosefield”, Description: “House”, RPS No.1965”</li> </ul>
<p>xxxvi) Submission objects to the addition of Heather Lodge, Kerry Mount Avenue (RPS No. 2053) to the RPS.</p> <p>Submission notes that the special interest of the structure is external only and considers that the property is adequately protected as it is located within the Foxrock ACA.</p>	<p><b>B1211</b></p>	<p>6</p>	<p>The Executive notes the content of the submission.</p> <p>The NIAH formed the opinion that the building is of architectural and artistic interest and therefore met the criteria for inclusion onto the RPS. The site was visited as part of the County Development Plan review on the 5<sup>th</sup> March 2020. On foot of the submission a follow-up inspection, which included the interior of the building, was carried out by the Conservation Section on the 10<sup>th</sup> May 2021.</p> <p>Having re-visited the site the Executive acknowledges the interior of the building has been heavily refurbished in the interim period with much loss of original fabric and character. In this instance it is considered the inclusion of the building onto the RPS should relate only to its exterior.</p> <p><b>Recommendation</b> Amend description of Heather Lodge RPS No. 2053, (p. 169) Table 4.1: ‘Record of Protected Structures’, Appendix 4 in the Draft Plan from:  “House”</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>To:</p> <p><i>"House (exterior only)".</i></p>
<p>xxxvii) Submission requests that The Ochra (House), Thornhill Rd (RPS No. 1982) is removed from the RPS as no original features remain and it considers that the property if not of great architectural or cultural significance.</p>	<p><b>B1223</b></p>	<p>14</p>	<p>The Executive notes the issues raised.</p> <p>The NIAH formed the opinion that the building is of architectural, artistic, historic, and social interest and therefore met the criteria for inclusion onto the RPS. The site was visited as part of the County Development Plan review on the 26<sup>th</sup> May 2020 to assess the merits of the building having regard to the recommendation of the NIAH.</p> <p>On foot of the submission, a follow-up inspection was carried out by the Conservation Section on the 12<sup>th</sup> May 2021 where the interior was inspected. The implications for 'listing' the house and the options available to the owners such as a Section 57 Declaration and the opportunity to avail of conservation grants for carrying our works to the building were discussed.</p> <p>Having re-visited the site the Executive remains of the opinion that dwelling is of architectural and artistic interest retaining many original features both externally and internally. Most of the windows retain their original glass with a number of stained-glass panes also remaining. Internally the timberwork and plasterwork, are examples of good craftsmanship all of which contributes to it special interest.</p> <p>Furthermore, the building has a historical association with the nearby Gate Lodge, which is also proposed for inclusion onto the RPS by way of a Ministerial <b>Recommendation</b> This relationship between the principle dwelling and the gate lodge remains unchanged and this connection contributes to its special interest.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xxxviii) Submission considers that Corners, Knocksinna (RPS No. 2015) does not satisfy the criteria for adding to the RPS and that the Ministers recommendation, local authority and elected</p>	<p><b>B1224</b></p>	<p>6</p>	<p>The Executive notes the issues raised.</p> <p>The NIAH formed the opinion that the building is of architectural and artistic interest and therefore met the criteria for inclusion onto the RPS. The site was visited as part of the County Development Plan review on the 16<sup>th</sup> June 2020 to assess the merits of the building having</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
members decision to add the structure onto the RPS is legally flawed.			<p>regard to the recommendation of the NIAH. On foot of the submission an attempt was made to access the property for a further inspection, however this could not be facilitated.</p> <p>Having regard to the NIAH survey the Executive agrees with the Ministerial <b>Recommendation</b> to include Corners onto the RPS. It is considered that the building meets one or more of the Categories of Special Interest to warrant inclusion on the Record of Protected Structures (Architectural, Historical, Archaeological, Artistic, Cultural, Scientific, Social or Technical interest) in accordance with Section 51(1) of the Planning and Development Act, 2000 (as amended).</p> <p>As per Section 12(3)(iv) of the Planning and Development Act, 2000 (as amended), all submissions/observations received with regard to a structure added to the RPS on foot of a Ministerial recommendation, were forwarded to the Minister for comment. The Minister did not make any observations on same.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
xxxix) Submission requests that Glentanar, Torquay Road (RPS No. 2009) is removed from the RPS as it is not a grand example of architectural style and contains no historically important structures. The property has also been significantly modified over time.	<b>B1233</b>	6	<p>The Executive notes the issue raised.</p> <p>The NIAH formed the opinion that the building is of architectural and artistic interest and therefore met the criteria for inclusion onto the RPS. The site was visited as part of the County Development Plan review on the 16<sup>th</sup> June 2020 to assess the merits of the building having regard to the recommendation of the NIAH. On foot of the submission an attempt was made to access the property for a further inspection, however this could not be facilitated.</p> <p>Having regard to the NIAH survey the Executive agrees with the Ministerial <b>Recommendation</b> to include Glentanar onto the RPS. It is considered that the building meets one or more of the Categories of Special Interest to warrant inclusion on the Record of Protected Structures (Architectural, Historical, Archaeological, Artistic, Cultural, Scientific, Social or Technical interest) in accordance with Section 51(1) of the Planning and Development Act, 2000, (as amended).</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>xl) Submission requests that the Gate Lodge at Beechlands (Ranville Lodge) (RPS No. 1978) is removed from the RPS as the property has been significantly modified and extended with no original features remaining.</p>	<p><b>B1254</b></p>	<p>10</p>	<p>The Executive notes the issue raised.</p> <p>The NIAH formed the opinion that the building is of architectural interest and therefore met the criteria for inclusion onto the RPS. The site was visited as part of the County Development Plan review on the 16<sup>th</sup> June 2020 to assess the merits of the building having regard to the recommendation of the NIAH.</p> <p>On foot of the submission a follow-up inspection, which included the interior of the building, was carried out by the Conservation Section on the 11<sup>th</sup> May 2021. Having re-visited the site the Executive acknowledges the interior of the building has been heavily refurbished with much loss of original fabric and character, and the original structure has been extended on foot of planning permission.</p> <p>In this instance the Conservation Section support the inclusion of the building onto the RPS, however, this should relate only to its exterior. The gate lodge is also of interest due to its historical association with the principle building Beechlands which is already on the Record of Protected Structures, RPS No. 1784.</p> <p><b>Recommendation</b>  Amend description of Beechlands RPS No. 1978, (p. 178) Table 4.1: 'Record of Protected Structures', Appendix 4 in the Draft Plan from:</p> <p><i>"Gate Lodge"</i></p> <p>To:</p> <p><i>"Gate Lodge (exterior only)"</i></p> <p><b>Amend Map 10 of the Draft Plan to depict the footprint of the original building only.</b></p>
<p>xli) Submission request that to Saint Brigid's Catholic Church Presbytery (RPS No. 2064), Johnstown Road, Cabinteely is removed from the RPS.</p>	<p><b>B1258</b></p>	<p>7</p>	<p>The Executive notes the issues raised.</p> <p>The NIAH formed the opinion that the Presbytery is of architectural, artistic, historical, and social interest. Any structure, which has one or more of the above categories of special interest, should be recommended for inclusion onto the RPS.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>Submission notes that works have been carried out to the presbytery and raises concern in relation to the ability to carry out future works</p> <p>(Note: A submission in relation to the church is set out under <b>B0058</b>).</p>			<p>The site was visited as part of the County Development Plan review on the 10<sup>th</sup> June 2020 to assess the merits of the building having regard to the recommendation of the NIAH. On foot of the submission a follow-up inspection, which included the interior of the building, was carried out by the Conservation Section on the 13<sup>th</sup> May 2021.</p> <p>The submission acknowledges that the former presbytery has historical value and interest, however reference is also made to alterations and extensions to the building to the rear of the original three-bay single-storey over basement former presbytery carried out under Reg. Ref. D08A/1343.</p> <p>With regards to extensions to Protected Structures, Section 6.8.4 of the “Architectural Heritage Protection Guidelines for Planning Authorities states <i>“In general, modern extensions to a protected structure do not have protected status themselves unless they contribute to the character of the structure. Therefore works to such an extension which do not affect the character of the protected structure itself, for example to the interior of the extension, would come within the normal rules relating to exemptions”</i>.</p> <p>Most historic buildings evolve over time and have been altered or extended. Conservation is the process of caring for buildings and places and of managing change to them in such a way to retain their character and special interest.</p> <p>As stated in the Architectural Heritage Protection Guidelines for Planning Authorities (AHPG’s) Chapter 7. Section 7.2.2 states <i>“Entry into the Record of Protected Structures does not mean that a structure is forever frozen in time. Good conservation practice allows a structure to evolve and adapt to meet changing needs while retaining its particular significance”</i>.</p> <p>In some instances, Planning Permission may be required for works; in others, a Section 57 declaration may be obtained from the Planning Authority, which would define works that may be not require permission. For works considered exempted development they must not materially affect the Protected Structure.</p> <p>The Conservation Section agrees with the Ministerial recommendation that the Saint Brigid’s Presbytery is of special interest and therefore warrants inclusion onto the RPS. The Presbytery</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>along with the adjacent Saint Brigid’s Church form part of an assembly of ecclesiastical structures that contribute to the architectural character and streetscape of Cabinteely Village. Following the site visit the Conservation Section recommends that only the footprint of the original structure, excluding the more recent pastoral centre to the rear and this should be indicted in the description and depicted in the County Development Plan Maps.</p> <p><b>Recommendation</b>                      Amend description of Brigid's Catholic Church RPS No. 2064, (p. 172) Table 4.1: ‘Record of Protected Structures’, Appendix 4 in the Draft Plan from</p> <p><i>“Presbytery”</i></p> <p>To:</p> <p><i>“Original two-storey former Presbytery (excluding the later pastoral centre to the rear).”</i></p> <p>Amend Map 7 of the Draft Plan, to depict only the footprint of the original two-storey villa style part of the structure.</p>
<b>3.19.1.3: Amendments to the RPS</b>			
<p>i) A number of corrections to the record of protected structures have been identified as follows:</p> <ul style="list-style-type: none"> <li>• RPS No. 823 Notre Dame School is now Fernbank.</li> <li>• RPS No. 1046 Churchtown House, Weston Park is incorrectly named The Orchard on mapping.</li> <li>• Railway Station (RPS No. 905), Carnegie Library (RPS 883), Taney Church (RPS No. 1004) and Sydenham Road, RPS Nos. 1924/7, 1952/3 are all located in the townland of Dundrum.</li> </ul>	<b>B0029</b>	1	<p>The Executive notes the issue raised.</p> <p>The structures referred to are already listed in the RPS. Having reviewed mapping data, it is considered reasonable to amend the townlands within the location column as required.</p> <p>As Notre Dame School is no longer located within Fernbank, it is considered appropriate to remove this reference from the structure name of RPS No. 823.</p> <p>RPS No. 1046 is listed as ‘Churchtown House’ in Section 4.1: ‘Record of Protected Structures’ in Appendix 4 of the Draft Plan. Protected Structures are not individually named on printed County Development Plan maps.</p> <p>It is noted that digital mapping associated with the Draft Plan states: <i>“If there are any discrepancies between this interactive map and the published maps, the published maps shall prevail.”</i></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p><b>Recommendation</b></p> <p>In Section 4.1: 'Record of Protected Structures' in Appendix 4 of the Draft Plan:</p> <ul style="list-style-type: none"> <li>• Amend the structure name of RPS No. 823 (p.114) to delete "Notre Dame School" and state "<del>Notre Dame School (Formerly Fernbank)</del>".</li> <li>• Amend location of Railway Station, RPS No. 905 (p.115), from "Taney Drive, Goatstown, Dublin 14" to "Taney Drive, <u>Dundrum</u>, <del>Goatstown</del>, Dublin 14"</li> <li>• Amend location of Carnegie Library, RPS 883 (p.114) from "Churchtown Road Upper, Churchtown, Dublin 14" to , "Churchtown Road Upper, <u>Dundrum</u>, <del>Churchtown</del>, Dublin 14."</li> <li>• Amend location of Christ Church, RPS No. 1004 (115) from "Taney Road, Goatstown, Dublin 14" to "Taney Road, <u>Dundrum</u>, <del>Goatstown</del>, Dublin 14."</li> <li>• Amend location of nos. 1-6 Sydenham Road, RPS Nos. 1924 -1927 and 1952 – 1953 (p.115) from "Sydenham Road, Kilmacud, Dublin 14" to "<u>Sydenham Road, Dundrum, Kilmacud, Dublin 14</u>"</li> </ul>
<p>ii) Submission requests that there would be no restriction to the demolition and extension of part of the building listed under RPS No. 2121, Farmhouse at Kiltiernan Villa, Ballybetagh Road.</p>	<p><b>B0064</b></p>	<p>9</p>	<p>The Executive notes the issue raised.</p> <p>The site was visited as part of the County Development Plan review on the 23rd June 2020 to assess the merits of the building having regard to the recommendation of the NIAH. On foot of the submission, a follow-up inspection was carried out by the Conservation Section on the 21st May, 2021 during which, the implications for 'listing' the dwelling were discussed.</p> <p>Most historic buildings evolve over time and have been altered or extended. Conservation is the process of caring for buildings and places and of managing change to them in such a way to retain their character and special interest.</p> <p>The designation of a building as a Protected Structure does not prevent them from being renovated or extended subject to the proposal being sensitive to the elements that make the building significant. As stated in the Architectural Heritage Protection Guidelines for Planning Authorities (AHPG's) Chapter 7. Section 7.2.2 states "<i>Entry into the Record of Protected Structures does not mean that a structure is forever frozen in time. Good conservation practice allows a structure to evolve and adapt to meet changing needs while retaining its particular significance</i>".</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submission seeks assurance that the protection of Saint Brigid's National School, Cabinteely (RPS No. 2063) would not hinder upgrading of the school or on-site facilities.</p>	<p><b>B0065</b></p>	<p>6</p>	<p>The Executive notes the issue raised.</p> <p>Map 6 of the Draft Plan depicts only the footprint of the original St Brigid's National School, constructed in 1914. The proposed addition onto the RPS does not include any other structures including the pre-fab structures within the school grounds.</p> <p>The submission refers to potential future of development of the site. The designation of a building as a Protected Structure does not prevent them from being extended subject to the proposal being sensitive to the original early twentieth century school building.</p> <p>Any future development would be assessed through the development management process.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Submission requests that only part of Dún Mhuire Seafield Road, Killiney (RPS No. 2134) is listed. An exemption for the lodge, library and outhouses is sought.</p>	<p><b>B0073</b></p>	<p>10</p>	<p>The Executive notes the issue raised.</p> <p>On foot of the submission the site was inspected by the Conservation Section on 27<sup>th</sup> May 2021. The Library structure attached to the rear of the original house, was constructed by the Franciscan Order after they moved to Dún Mhuire in the 1940s.</p> <p>This structure is not considered to be of any architectural merit. With regards to extensions to Protected Structures, Section 6.8.4 of the "Architectural Heritage Protection Guidelines for Planning Authorities" states:</p> <p><i>"In general, modern extensions to a protected structure do not have protected status themselves unless they contribute to the character of the structure. Therefore works to such an extension which do not affect the character of the protected structure itself, for example to the interior of the extension, would come within the normal rules relating to exemptions".</i></p> <p>The Gate Lodge is contemporaneous with the original house. Internally the building was substantially refurbished in recent years and little original fabric remains. Gate Lodge is considered to lie within the curtilage of the principle structure.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>It is noted that Dún Mhuire is inadvertently listed as being on Map 7 rather than Map 10 in Section 4.1 'Record of Protected Structures' in Appendix 4 of the Draft Plan.</p> <p><b>Recommendation</b> Amend description of Dún Mhuire, RPS No. 2134 Section 4.1 'Record of Protected Structures' (p.174) in Appendix 4 of the Draft Plan, from:</p> <p><i>"House"</i></p> <p>To:</p> <p><i>"House (excluding later mid-20<sup>th</sup> century extension to the rear)"</i></p> <p>Relocate Dún Mhuire to Map 10 in Section 4.1 'Record of Protected Structures' in Appendix 4.</p> <p>Amend Map 10 of the Draft Plan to depict the footprint of the original part of the structure only.</p>
v) Submission requests that later additions to Kilsallagh, Kerrymount Avenue, Foxrock (RPS No. 1966) are excluded from the listing.	<b>B0109</b>	6	<p>The Executive agrees with the issue raised.</p> <p>The submission refers to a later flat roof single storey addition to the west side of the dwelling be excluded from any restrictions applying to the main house to allow future changes.</p> <p>With regards to extensions to Protected Structures, Section 6.8.4 of the "Architectural Heritage Protection Guidelines for Planning Authorities states <i>"In general, modern extensions to a protected structure do not have protected status themselves unless they contribute to the character of the structure. Therefore works to such an extension which do not affect the character of the protected structure itself, for example to the interior of the extension, would come within the normal rules relating to exemptions"</i>.</p> <p><b>Recommendation</b> Amend Map 6 of the Draft Plan to depict the footprint of the original part structure only.</p>
vi) Submission requests that an existing vehicular access point is taken into account in the extent of	<b>B0130</b>	5	<p>The Executive agrees with the issue raised and notes the location of an existing vehicular access point on Ballinteer Road.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
wall mapped for Pillars and Walls at 1 Ballinteer Gardens (RPS No. 2132).			<p><b>Recommendation</b> Amend Map 5 of the Draft Plan to reflect the correct extent of the wall.</p>
<p>vii) Submission requests that the addition of the Glasshouse (RPS No. 2000) and The Walled Garden (RPS No. 2079) at Glencairn House are reconsidered as they are already within the curtilage of a Protected Structure (Glencairn House) and are adequately protected as such. Consideration is also requested with regard to the diplomatic nature and security of the property.</p> <p>viii) Submission further requests that the addition to the RPS is not solely based upon the NIAH record.</p>	<b>B0336</b>	6	<p>The Executive notes the issue raised.</p> <p>Glencairn House is already on the Record of Protected Structures, RPS. No. 1643. The current description reads "House, Gate Lodge, Outbuildings and Conservatory". The Executive agrees with the Ministerial recommendation to include the glasshouse and walled garden at Glencairn onto the RPS and they be given their own separate entry.</p> <p>The NIAH formed the opinion that the glasshouse (Conservatory) was of Architectural, Artistic and Technical Interest, while the walled garden was considered of Architectural Interest. Both structures have a historical association with the principle building and contribute to the group and setting of the Glencairn estate. The relationship between these structures and the principle dwelling remains unchanged and this connection contributes to their special interest.</p> <p>As per Section 12(3)(iv) of the Planning and Development Act, 2000 (as amended), all submissions/observations received with regard to a structure added to the RPS on foot of a Ministerial recommendation, were forwarded to the Minister for comment. The Minister did not make any observations on same.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ix) Submission supports the addition of the Glasshouse at Mount Annville (RPS No. 2100) onto the RPS however, clarity is sought in relation to the curtilage of the structure.</p>	<b>B0910</b>	2	<p>The Executive notes and agrees with the proposal to add the Glasshouse at Mount Annville to the RPS (No.2100)</p> <p>A Section 57 Declaration may define the curtilage for the Glass House.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>x) Submission supports the addition of the Former Cricket Pavilion (now part of the golf clubhouse), Woodbrook, (RPS No. 2060) onto the RPS however,</p>	<b>B0975</b>	14	<p>The Executive notes and welcomes the support provided.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>clarity is sought in relation to the structure and curtilage that is protected.</p>			<p>The Draft County Development Plan Maps depicts only the footprint of the original Cricket Pavilion. It is considered reasonable to amend the description of the structure in the RPS to reflect the extent of the protection.</p> <p><b>Recommendation</b>  Amend RPS. No. 2060 (p.180), Section 4.1 'Record of Protected Structure (RPS),' Appendix 4 in the Draft Plan from:</p> <p><i>"Former Cricket Pavilion now Golf Club"</i></p> <p>To:</p> <p><i>"Former Cricket Pavilion, now Golf Club (excluding later extensions to east and west)"</i></p>
<p>xi) Submission welcomes addition of buildings at the CMH to the RPS but request a reconsideration in relation to the structures to the north of the main building so as to ensure that they meet the criteria for inclusion.</p>	<b>B1043</b>	1	<p>The Executive notes the support provided and agrees with the issue raised.</p> <p>The Central Mental Hospital site has evolved and developed over time with a series of later additions. The original detached seventeen-bay three-storey over basement structure, was built on an elongated H-plan with single-bay (five-bay deep) three-storey gabled projecting end bays centred on three-bay three-storey double-pile projecting block with single-bay full-height gabled breakfront.</p> <p><b>Recommendation</b>  Amend Map 1 of the Draft Plan to depict the footprint of the original asylum building built on an elongated H-Plan and the first period of extension ascribed to J.H. Owens (1860-3).</p>
<p>xii) Submission requests clarification with regard to the addition of Tallon House, Foxrock (RPS No. 2045) to the RPS, including:</p> <ul style="list-style-type: none"> <li>• Confirmation of the Tallon House definition what designation encompasses.</li> <li>• Confirmation that neither the "Gate Lodge" nor the Potting Shed form part of the proposed addition.</li> </ul>	<b>B1119</b>	6	<p>The Executive notes the issue raised.</p> <p>The Executive agrees with the Ministerial recommendation to include Tallon House onto the RPS. The potting shed and Gate Lodge do not form part of the proposed recommendation for inclusion onto the RPS.</p> <p>The description for the structure, RPS No. 2045 as listed in Section 4.1 'Record of Protected Structure (RPS),' Appendix 4 in the Draft Plan refers only to the "House" and this is the only structure depicted on Map 6 of the Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> <li>Confirmation that there are no restrictions on the "House" and the "Gate Lodge" being sold as two separate entities at any time in the future.</li> </ul>			<p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xiii) Submission seeks clarity in relation to the description and extent of protection to the Kill O' The Grange Church (RPS No. 2039). It is requested that protection only refers to the church and not the parish centre.na</p>	<b>B1212</b>	7	<p>The Executive agrees with the issue raised.</p> <p>Map 7 of the Draft Plan correctly shows the Church building only to be added to the RPS. It is considered appropriate to amend the entry in Section 4.1 'Record of Protected Structure (RPS),' Appendix 4 in the Draft Plan.</p> <p><b>Recommendation</b> Amend description of Kill Of The Grange Church, RPS No. 2039, (p.172), Section 4.1 'Record of Protected Structure (RPS),' Appendix 4 in the Draft Plan from:</p> <p><i>"Church/Parish Centre"</i></p> <p>To:</p> <p><i>"Church/Parish-Centre"</i></p>
<p>xiv) Submission seeks clarification in relation to replacement windows to the Gate Lodge at Dorney Court (RPS No. 2010). If replacement windows cannot be added to the property, the submission objects to its addition to the RPS.</p>	<b>B1215</b>	10	<p>The Executive notes the issue raised.</p> <p>The decision to add or not to add a structure to the RPS is based on whether the building meets one or more of the Categories of Special Interest in accordance with Section 51(1) of the Planning and Development Act, 2000, (as amended). The NIAH formed the opinion that the Gate Lodge at Dorney Court is of architectural interest and therefore met the criteria for inclusion onto the RPS.</p> <p>The site was visited as part of the County Development Plan review on the 16<sup>th</sup> June, 2020. The Executive is in agreement with the Ministerial recommendation that the Gate Lodge is of special interest and therefore warrants inclusion onto the RPS. The adjacent gateway is also proposed to be added to the RPS; together they form an assemblage of structures that remain from of the Dorney Court estate (since demolished).</p> <p>The submission states that they have no objection in principle to the building being added to the RPS, provided they can install double glazed windows, if these are not permitted then they</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>do not want to be added to the RPS. With regards to replacement of windows this would be subject to the planning process.</p> <p>Guidance on Windows for Protected Structures is set out in Chapter 10 of the <i>Architectural Heritage Protection Guidelines for Planning Authorities</i>, 2004, Revised 2011 and states the following: <i>"The visual impact of alterations to the windows of a historic structure can be significant. ... It is of importance to the character and appearance of a structure that fenestration patterns are protected. Where replacement windows are permitted, the materials, glazing divisions and sectional profile of the new windows should be appropriate to the date of the protected structure or to the date when the opening was made."</i></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xv) Submission notes the addition of Herberton, Upper Kilmacud Road (RPS No. 2127) and welcomes the opportunity to secure the future of the structure, however, an ACA would be the preferred designation. If this is not possible, a Section 57 is sought in relation to works to the property</p>	<p><b><u>B1250</u></b></p>	<p>1</p>	<p>The Executive notes the issue raised.</p> <p>The Executive considers the building to meet one or more of the Categories of Special Interest to warrant inclusion on the Record of Protected Structures (Architectural, Historical, Archaeological, Artistic, Cultural, Scientific, Social or Technical interest) in accordance with Section 51(1) of the Planning and Development Act 2000 (as amended).</p> <p>On foot of the submission, an inspection of the building was carried out by the Conservation Section on the 12.05.21. And a Section 57 Declaration will be issued to the owner. This will determine which elements/features of the interior are of interest and to clarify the type of works would be considered exempted development i.e. which would not require planning permission</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>xvi) Submission requests that the protection of Woodford, Ballybride Road (RPS No. 1999) only applies to the original property and mapping is amended to align with this.</p>	<p><b><u>B1251</u></b></p>	<p>10</p>	<p>The Executive agrees with the issue raised.</p> <p>The submission refers to alterations and extensions to the building which are requested to be excluded from protection and Draft Plan Maps aligned to depict only the older part of the structure.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>With regards to extensions to Protected Structures, Section 6.8.4 of the "Architectural Heritage Protection Guidelines for Planning Authorities states <i>"In general, modern extensions to a protected structure do not have protected status themselves unless they contribute to the character of the structure. Therefore works to such an extension which do not affect the character of the protected structure itself, for example to the interior of the extension, would come within the normal rules relating to exemptions"</i>.</p> <p><b>Recommendation</b> Amend Map 10 of the Draft Plan to depict the footprint of the original part of the structure only.</p>
<p>xvii) Submission notes a preference to have 1 Sydenham Place (RPS No. 2129) designated as an ACA, however, the addition to the RPS is noted as being the best way to protect the property at the moment and S.57 would be sought for internal works.</p>	<p><b><u>B1252</u></b></p>	<p>1</p>	<p>The Executive notes the issue raised.</p> <p>The Executive considers the building to meet one or more of the Categories of Special Interest to warrant its inclusion on the Record of Protected Structures (Architectural, Historical, Archaeological, Artistic, Cultural, Scientific, Social or Technical interest) in accordance with Section 51(1) of the Planning and Development Act, 2000 (as amended).</p> <p>On foot of the submission, an inspection of the building was carried out by the Conservation Section on the 9<sup>th</sup> June, 2021. The Planning Authority can issue a Section 57 Declaration to determine which elements/features of the interior are of interest and to clarify the type of works would be considered exempted development i.e. which would not require planning permission.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xviii) Submission notes a preference to have 2 Sydenham Place (RPS No. 2130) designated as an ACA as that would be less onerous on the property owner. If an ACA is not possible, the submission requests that the protection of the property along with a Section 57 exemption is considered where the protection extends to the exterior only.</p>	<p><b><u>B1255</u></b></p>	<p>1</p>	<p>The Executive notes the issue raised.</p> <p>The Executive considers the building to meet one or more of the Categories of Special Interest to warrant inclusion on the Record of Protected Structures (Architectural, Historical, Archaeological, Artistic, Cultural, Scientific, Social or Technical interest) in accordance with Section 51(1) of the Planning and Development Act 2000 (as amended).</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>On foot of the submission, an inspection of the building was carried out by the Conservation Section on the 30<sup>th</sup> June, 2021. The Planning Authority can issue a Section 57 Declaration to determine which elements/features of the interior are of interest and to clarify the type of works would be considered exempted development i.e. which would not require planning permission.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<b>3.19.1.4: RPS - Miscellaneous Issues</b>			
<p>i) Submission notes that Melfield House (RPS No.2008) is in need of works, particularly to the roof and that the property should be maintained by its current owners.</p>	<b><u>B0045</u></b>	2	<p>The Executive notes the issue raised.</p> <p><b>The maintenance of a Protected Structure is not a County Development Plan matter. Section 58 of the Planning and Development Act, 2000 (as amended) places a duty on owners and occupiers of Protected Structures to protect them from endangerment.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission raises concerns in relation to the system of blanket protection and notes shortcomings of the legislation and the NIAH rating system in terms of the addition of structures onto the RPS. Submission further states that DLR did not carry out their own conservation assessment of the property.</p>	<b><u>B0058</u></b> <b><u>B0561</u></b> <b><u>B0827</u></b> <b><u>B0968</u></b> <b><u>B0973</u></b> <b><u>B0979</u></b> <b><u>B1086</u></b> <b><u>B1258</u></b>		<p>The Executive notes the issue raised.</p> <p><b>Matters with regard to legislation, the rating system and/or any methods employed by the National Inventory of Architectural Heritage (NIAH) are not a County Development Plan.</b></p> <p>Under the provisions of Section 53 of the Planning and Development Act, 2000 (as amended), the Planning Authority must have regard to any recommendations made by the Minister with regard to the inclusion of structures onto its Record of Protected Structures.</p> <p>With regard to Ministerial recommendations, the NIAH formed an opinion that a building/structure met one or more of the Categories of Special Interest to warrant its inclusion on the Record of Protected Structures (Architectural, Historical, Archaeological, Artistic, Cultural, Scientific, Social or Technical interest) in accordance with Section 51(1) of the Planning and Development Act, 2000, (as amended). As part of the Draft Plan review process, the Conservation Section assessed these structures. Where the Conservation division agreed with the NIAH assessment, it was placed onto the RPS of the Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>As per Section 12(3)(iv) of the Planning and Development Act, 2000 (as amended), all submissions/observations received with regard to a structure added to the RPS on foot of a Ministerial recommendation, were forwarded to the Minister for comment. The Minister did not make any observations on same.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) The submission suggests that all properties over 100 years old in Dún Laoghaire should be listed and it should be designated as a heritage town.</p>	<p><b>B0141</b></p>	<p>3</p>	<p>The Executive notes the issue raised.</p> <p>Buildings are not simply added to the RPS due to their age. They must meet one or more of the Categories of Special interest as set out in Section 51 (1) of the Planning and Development Act, 2000, (as amended). The submission does not provide any supporting documentation such as photos, site location map, and a reason for their addition i.e. special interest in accordance with the criteria as set out in the Planning and Development Act 2000.</p> <p>The Draft Plan includes policies designed to protect those older buildings which, although not Protected Structures, are considered to make a positive contribution to the streetscapes. These include Policy HER20: 'Buildings of Vernacular and Heritage Interest', which seeks to <i>"retain where appropriate and encourage the rehabilitation and suitable reuse of existing older buildings/structures/features which make a positive contribution to the character and appearance of the area and streetscape in preference to their demolition and redevelopment and to preserve surviving shop and pub fronts of special historical or architectural interest including signage and associated features"</i>.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Submission states that the harbour walls and slipway at Coliemore harbour should be regularly checked for damage in light of both its heritage and amenity value.</p>	<p><b>B0890</b></p>	<p>4</p>	<p>The Executive notes the issue raised.</p> <p><b>The maintenance of the harbour is not a County Development Plan issue, rather it is an operational matter.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
v) The protection of exemplary and pivotal modern buildings as part of the architectural heritage should be actively considered in the review of the RPS.	<b>B0929</b>		<p>The Executive notes the issue raised.</p> <p>Dún Laoghaire-Rathdown has a number of twentieth century structures already on the RPS, such as the group of modern movement houses in Knocksinna, Foxrock, which date from the 1930s, others include the Church of Saint Stephen's, Killiney Hill Road, opened in 1984.</p> <p>The Draft Plan contains policies designed to protect those buildings which, although not Protected Structures, are considered to make a positive contribution to the streetscape or area. These include Policy HER21: 'Nineteenth and Twentieth Century Buildings, Estates and Features' which states: <i>"It is Council policy to: i. Encourage the appropriate development of exemplar nineteenth and twentieth century buildings, and estates to ensure their character is not compromised. And ii. Encourage the retention and reinstatement of features that contribute to the character of exemplar nineteenth and twentieth century buildings, and estates such as roofscapes, boundary treatments and other features considered worthy of retention"</i>.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<b>3.19.2: Architectural Conservation Areas</b>			
i) The gates at the Mount Merrion Avenue entrance should be restored as originally designed as part of Waltham Terrace Architectural Conservation Area.	<b>B0018</b>	2	<p>The Executive notes the issue raised.</p> <p><b>Works to a structure is not a County Development Plan matter.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
ii) The submission relates to realignment to the boundary at the rear of the 4 houses on Willow Bank in the proposed De Vesci, Vesey and Willow Bank Architectural Conservation Area (ACA) to ensure it reflects their integrity. The submission also requests the exclusion of the full back gardens, original out buildings, courtyards, laneways, and granite boundary walls of the 4 houses at Willow Bank as this is inconsistent with the ACA.	<b>B0027</b>	2	<p>The Executive notes the issue raised.</p> <p>The dwellings at Willow Bank, while designated Protected Structures, were included within the Candidate Architectural Conservation Area boundary (under the 2016-2022 Dún Laoghaire-Rathdown County Development Plan), and therefore were retained within the boundary of the Architectural Conservation Area.</p> <p>The Architectural Heritage Protection Guidelines for Planning Authorities states that "the boundaries of an ACA should make physical, visual and planning control sense. It is generally</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>preferable for the boundary of an ACA to coincide with the rear boundary of properties in urban areas”.</p> <p><b>Recommendation</b> Amend the Draft Plan as follows:</p> <p>The proposed De Vesce, Vesey and Willow Bank ACA boundary be extended to include the full back gardens, original out buildings, courtyards, laneways, and granite boundary walls of the four houses at Willow Bank.</p> <p>Amend Map 2 accordingly.</p>
<p>iii) Marlay Park needs to be designated an Architectural Conservation Area.</p> <p>The submission highlights the importance of Marlay Park in terms of architectural landscape and historical landscape and its importance as a tourist amenity and needs to be declared an Architectural Heritage Area.</p> <p>An Taisce welcomes the proposal to designate Marlay Park as a candidate Architectural Conservation Area. The demesne landscape at Marlay needs to be better recognised and protected. When the written description for the ACA is being prepared, that attention should be directed to the submissions made on behalf of An Taisce and other conservation organisations in the consultation period for the Marlay Park Masterplan.</p>	<p><b><u>B0052</u></b> <b><u>B0366</u></b> <b><u>B0794</u></b></p>	<p>5</p>	<p>The Executive notes the contents of the submission.</p> <p>Marlay Park has been added to Appendix 4 Candidate Architectural Conservation Area (cACA) as part of the Draft Plan. It is also covered by Objective HER18 Development within a candidate Architectural Conservation Area. It is also afforded protection through Policy designation HER26 'Historic Demesnes and Gardens' in addition to its status as a cACA.</p> <p>It is the intention of the Executive to assess and bring forward Marlay Park cACA along with the other cACA's with a view of redesignation as ACAs.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Submission request that Saint Brigid's Catholic Church and Presbytery, Johnstown Road, Cabinteely be considered as an ACA rather than being added to the RPS.</p>	<p><b><u>B0058</u></b> <b><u>B1258</u></b></p>	<p>7</p>	<p>The Executive notes the issue raised.</p> <p>The Executive considers both Saint Brigid's Catholic Church and Presbytery to meet one or more of the categories of special interest to warrant inclusion onto the Record of Protected</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>Structures, in accordance with Section 51(1) of the Planning and Development Act, 2000, as amended. Both structures are listed on the RPS.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>v) The submission suggests that the garden to the rear of No. 16 Sydney Avenue be excluded from the proposed Sydney Avenue ACA.</p>	<b><u>B0120</u></b>	3	<p>The Executive notes the issue raised.</p> <p>The Architectural Heritage Protection Guidelines for Planning Authorities states that <i>“the boundaries of an ACA should make physical, visual and planning control sense. It is generally preferable for the boundary of an ACA to coincide with the rear boundary of properties in urban areas”</i>.</p> <p>The designation of the rear garden within an ACA boundary does not prevent any future development within the rear garden.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>vi) The Council should amend the Marlborough Road cACA to incorporate suitable redevelopment of the 20th century buildings to satisfy modern living with energy efficient structures that address Irelands to 2050 legally binding climate change commitment.</p> <p>Development of sufficient architectural design that compliments the area should be considered.</p> <p>The Council should clarify that extensions of any properties on Marlborough Road is not restricted by any cACA requirement by maintaining the cACA boundary along the front of the properties or by stating that extensions are not of material concern for the ACA.</p>	<b><u>B0239</u></b> <b><u>B0244</u></b> <b><u>B0266</u></b> <b><u>B0332</u></b> <b><u>B0348</u></b> <b><u>B0380</u></b> <b><u>B0425</u></b> <b><u>B0429</u></b> <b><u>B0438</u></b> <b><u>B0470</u></b> <b><u>B0478</u></b> <b><u>B0499</u></b> <b><u>B0500</u></b> <b><u>B0502</u></b> <b><u>B0505</u></b> <b><u>B0598</u></b> <b><u>B0620</u></b>	3 7	<p>The Executive notes the issues raised.</p> <p>In terms of energy efficiency works to buildings within an ACA, the Executive supports the need to improve the thermal performance of the older building stock provided that the retrofitting or energy efficiency measures does not harm or compromise the character of the buildings and the ACA. Any upgrading works should comply with the Department of Housing, Local Government and Heritage Guidance booklet “Energy efficiency in Traditional Buildings”. The Irish Standard publication prepared by CEN Technical Committee on Conservation of Cultural Heritage also sets out a systematic procedure to assist decision-making in the context of upgrading the energy efficiency of the historic building stock.</p> <p>Works, such as rear extensions, to dwellings located within cACAs or ACAs are not restricted due to designation. Proposals will be assessed on a case-by-case basis, and will be subject to design, scale and location and shall accord with Section 12.11.3 Architectural Conservation Areas and Section 12.11.4 New Development within an ACA of the Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>The submission requests that the character appraisal report for the ACA is amended stating that proposals for extensions to the houses within the ACA, particularly those of 20th century, will be treated favourably provided that such are visually subservient to the original and employ materials which are in keeping with the existing.</p> <p>The large houses on Adelaide Road are of considerable heritage value and they constitute the link between the developments of Silchester Road and Marlborough Road.</p> <p>The Council should amend the Marlborough Road ACA to incorporate a wider area including the lands along Adelaide Road and Station to restore the integrity of designation of the land between Marlborough Road and Silchester Road and to accords with the advice in the Architectural Heritage Guidelines for Planning Authorities.</p>	<p><b><u>B0621</u></b>  <b><u>B0788</u></b>  <b><u>B0908</u></b>  <b><u>B0994</u></b>  <b><u>B1038</u></b>  <b><u>B1081</u></b>  <b><u>B1140</u></b>  <b><u>B1142</u></b>  <b><u>B1219</u></b>  <b><u>B1235</u></b>  <b><u>B1236</u></b>  <b><u>B1242</u></b></p>		<p>While designating Silchester Road an ACA and proposing Marlborough Road as an ACA, the section along Adelaide Road and Station Road remains a candidate ACA (cACA). This is shown in Map 7. It is the intention of the Executive to assess cACAs to determine if they meet the requirements and criteria for re-designation as ACAs as per Policy Objective HER17.</p> <p><b>Recommendation</b>  No change to Draft Plan.</p>
<p>vii) The submission welcomes the Candidate Architectural Conservation Area status for Dundrum Main Street, however, the ACA should be extended to include as much of the older buildings on the street as possible (i.e. east and west side).</p> <p>The candidate ACAs in Dundrum should be prioritised to full ACA status.</p> <p>An Taisce notes SLO 114 and states that sufficient resources be allocated so that the existing cACA area at Dundrum Village Crossroads and the new cACA for Dundrum Main Street can be assessed with</p>	<p><b><u>B0271</u></b>  <b><u>B0794</u></b>  <b><u>B1124</u></b></p>	<p>1</p>	<p>The Executive notes the issues raised.</p> <p>The Dundrum ACA boundary encompasses the majority of the older building stock within Dundrum Village. In addition to the ACA status, there are a number of Policies in the Draft Plan that would afford protection to older buildings not included within the boundary of the ACA. These include HER20 Buildings of Vernacular Heritage Interest and HER21 Nineteenth and Twentieth Century Buildings, Estates and Features.</p> <p>The Draft Dún Laoghaire-Rathdown Development Plan 2022-2028 includes the existing ACAs at Pembroke cottages as well as the candidate ACA around Dundrum cross, but also includes a new 'Proposed Candidate ACA' at the northern end of Main Street, covering <i>inter alia</i> Glenville Terrace, Pembroke Terrace and a part of Claremont Terrace.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>a view to prompt re-designation as ACAs by Variation of the Plan.</p>			<p>It is proposed that the existing ACAs at Pembroke Cottages be amalgamated with an expanded ACA surrounding Dundrum Cross as well as with the Proposed Candidate ACA at the northern end of Main Street in the adopted County Development Plan 2022-2028.</p> <p>An ACA appraisal report has been prepared which assesses the proposed cACA and cACA and determines that they met the requirements and criteria for designation as a full ACA (refer to supplementary appraisal document). The boundaries of both the proposed cACA and the cACA are slightly altered on foot of the appraisal report. This accords with Policy AR16 Candidate Architectural Conservation Areas (cACA) of the current 2016 – 2022 County Development Plan.</p> <p>Together, the combined areas will be known simply as the ‘Dundrum ACA’ and will bestow full ACA status on the ‘candidate’ and ‘proposed candidate’ areas shown in the Draft County Development Plan 2022-2028.</p> <p>Upon adoption of the Development Plan, the existing, candidate and proposed candidate ACAs will be combined into a single Dundrum ACA.</p> <p>It is recommended that Chapter 7 “<i>Towns, Villages and Retail Development</i>” be updated to include reference to the ACA informing the future LAP.</p> <p><b>Recommendation</b>                      Amend Appendix 4 and Map 1 of the Draft Plan to include;</p> <ul style="list-style-type: none"> <li>• Dundrum Candidate Architectural Conservation Area (cACA) as a proposed Architectural Conservation Area (ACA).</li> <li>• Proposed Dundrum Candidate Architectural Conservation Area as a proposed Architectural Conservation Area (ACA).</li> </ul> <p>Amend boundary of the proposed Architectural Conservation Area to include ‘Millhouse’ and “Lynton/Ashgrove”.</p> <p>Amend boundary of the proposed candidate Architectural Conservation Area to include the property to the north of Glenville Terrace (Adjacent to the old Shopping centre site).</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>Amend Section 4.3.1 Introduction (p. 185) of Appendix 4 as follows:</p> <p>From:</p> <p><i>“Dún Laoghaire-Rathdown County Council will designate the following Candidate Architectural Conservation Areas as Architectural Conservation Areas as part of the Dún Laoghaire-Rathdown County Development Plan, 2022 – 2028:</i></p> <ul style="list-style-type: none"> <li>• <i>De Vesci, Vesey and Willow Bank.</i></li> <li>• <i>Marlborough Road.</i></li> <li>• <i>Seafort Parade.</i></li> <li>• <i>Sydney Avenue.</i></li> <li>• <i>Waltham Terrace.</i></li> </ul> <p><i>The boundary of the existing Dundrum Candidate Architectural Conservation Area (cACA), will be extended and will consists of two areas, the existing corner/roads (as per the existing cACA), and a section of Dundrum Main Street, as part of the Dún Laoghaire-Rathdown County Development Plan, 2022 – 2028 – refer to Map for more details”.</i></p> <p>To:</p> <p><i>“Dún Laoghaire-Rathdown County Council will designate the following Candidate Architectural Conservation Areas as Architectural Conservation Areas as part of the Dún Laoghaire-Rathdown County Development Plan, 2022 - 2028:</i></p> <ul style="list-style-type: none"> <li>• <i>De Vesci, Vesey and Willow Bank.</i></li> <li>• <i>Marlborough Road.</i></li> <li>• <i>Seafort Parade.</i></li> <li>• <i>Sydney Avenue.</i></li> <li>• <i>Waltham Terrace.</i></li> <li>• <i><u>Dundrum.</u></i></li> </ul> <p><del><i>The boundary of the existing Dundrum Candidate Architectural Conservation Area (cACA), will be extended and will consists of two areas, the existing corner/roads (as per the existing</i></del></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><i><del>ACA), and a section of Dundrum Main Street, as part of the Dún Laoghaire-Rathdown County Development Plan, 2022 – 2028 – refer to Map for more details.”</del></i></p> <p>Include an additional paragraph at the end of Section 4.3.2 What is an Architectural Conservation Area? (p. 185) of Appendix 4, as follows:</p> <p><i><u>“Section 3.7 of the Architectural Heritage Protection guidelines (2004, 2011) sets out criteria with respect to Development Control in Architectural Conservation Areas. It is considered that the Policy Objectives as detailed in Chapter 11 (Heritage and Conservation) and Chapter 12 (Development Management) of the Written Statement and in Sections 4.3.3, 4.3.4, 4.3.5, 4.3.6, 4.3.7, 4.3.8 and 4.3.9 of this Appendix provide adequate guidance on how proposals will be assessed.”</u></i></p> <p>Include the following new Sections after “4.3.6 Works not likely to affect the character of the ACA”, (p. 187) of Appendix 4 as follows:</p> <p><u>“4.3.7 Amalgamation of Properties or Sites</u></p> <p><u>Amalgamation of Structures: The amalgamation of two or more buildings into one functional unit requires planning permission irrespective of whether it is located in an ACA or not.</u></p> <p><u>Amalgamation of Plots:</u>  <u>The existing plot structure is generally to be retained to express the existing grain, which is an important determining factor of the special character of the ACA.</u></p> <p><u>4.3.8 Commercial Frontages</u>  <u>Alterations to Existing Shop fronts and Signage:</u></p> <ul style="list-style-type: none"> <li><i><u>Planning applications for alterations to shop fronts within the ACA boundaries will also be assessed on the impact of the proposed design on surrounding structures and the special character of the ACA, having regard to scale, proportions, materials, and detailing.</u></i></li> </ul> <p><u>New Shop fronts:</u></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<ul style="list-style-type: none"> <li>• <u>The introduction of shop fronts to buildings within the ACA may damage the special character of the ACA and need to be considered in the context of the streetscape.</u></li> </ul> <p><u>Replacement Shop fronts:</u></p> <ul style="list-style-type: none"> <li>• <u>For the existing shop fronts, applications within the ACA boundaries will be assessed on the impact of the proposed design on the special character of the ACA, having regard to scale, proportions, materials and detailing. This does not preclude good modern design, and well considered design solutions will be favoured to ensure the authentic quality of the ACA is maintained.</u></li> <li>• <u>Proposed shop front designs should follow general design guidance for shop fronts given in Section 12.6.8 Shop fronts, Signage, Advertising and Public Art and Section 12.11.4 New Development within an ACA of the Draft 2022-2028 Dún Laoghaire-Rathdown County Development Plan.</u></li> </ul> <p><u>New Signage:</u></p> <ul style="list-style-type: none"> <li>• <u>New signage on the commercial structure in the ACA should be of an appropriate design to complement or enhance the structure and should not be overly dominant on the streetscape.</u></li> <li>• <u>Standard corporate signage, which would detract from the character of the ACA should be adapted in scale, colour, or material colour to be more in keeping with the area.</u></li> <li>• <u>Outdoor Advertising Billboards:</u></li> <li>• <u>Outdoor advertising will detract from the special character of the ACA and should therefore be limited.</u></li> <li>• <u>Billboards which conceal historic features or impinge on significant views will not be deemed acceptable.</u></li> </ul> <p><u>Shutters:</u></p> <ul style="list-style-type: none"> <li>• <u>The design of security shutters should complement rather than damage the character of the building and the ACA. Security shutters should not cover the entire commercial building frontage, but only the vulnerable glazed areas. Shutter boxes should be positioned discreetly behind the fascia board or sliding lattice grills be positioned behind the shop window. Where appropriate to the type of shop or to the historic interior arrangement, security shutters should be placed behind the window display.</u></li> </ul>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<ul style="list-style-type: none"> <li>• <u>Where external security screens are deemed acceptable, they should be of transparent open chain-link grille design rather than solid or perforated shutters, which are not transparent when viewed obliquely.</u></li> <li>• <u>Shutters and grilles should be painted or finished in colour to complement the rest of the exterior.</u></li> <li>• <u>Metal roller shutters with visible boxes are not acceptable within the ACA boundaries.</u></li> </ul> <p><u>External Seating and Screening:</u></p> <ul style="list-style-type: none"> <li>• <u>External seating should be of wood, painted metal or other material which enhances the visual appearance of the ACA. Plastic is not an acceptable material for seating.</u></li> </ul> <p><u>Other External Elements to Commercial Premises:</u></p> <ul style="list-style-type: none"> <li>• <u>Canopies, awnings, newspaper receptacles, vending machines, etc. can incrementally damage the special character of an ACA.</u></li> <li>• <u>Where canopies or awnings are deemed acceptable in this location, they should not be made of plastic, but of heavy-duty cotton material with painted metal or timber hardware.</u></li> <li>• <u>Commercial premises should limit the clutter of temporary external retail furniture, such as external heaters, bins, menu-boards, etc.</u></li> <li>• <u>Such fittings are only acceptable where their design complements or enhances the character of the area”.</u></li> </ul> <p><u>In addition to the above guidance, applicants should also refer to Section 12.6.8 Shopfronts, Signage, Advertising and Public Art of the Draft Plan.</u></p> <p><u>4.3.9 Works to the Public Realm</u>  <u>Unsympathetic works can have a detrimental impact upon the character of the ACA. In this instance, any planned works to the public realm should be respectful of the special character of the area and enhance the appreciation and setting of the streetscape in line with Policy Objectives within 11.4.3 Protection of Other Elements of Built Heritage of the 2022-2028 Draft County Development Plan.</u></p> <p><u>Any alterations to paving and street furniture should be in keeping with the visual simplicity of the ACA, and any existing original feature i.e. paving, cobble stones, kerbing retained, where</u></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p><i><u>possible. Where historic evidence of street furniture does not survive, new elements should be of a high quality and low-key. Conspicuous arrays of litter bins or bollards should be avoided to minimise clutter. The impact of necessary items should also be mitigated by well considered positioning. Overhead electricity supply and telephone cables and poles detract strongly from the character of the ACA. Any initiatives to place overhead services underground and the removal of redundant services from the façades of building would be encouraged within the historic ACA.</u></i></p> <p><i><u>Notwithstanding the above guidance, applicants are strongly advised to refer to the details contained within each ACA Character Appraisal Report.</u></i></p> <p><i><u>Amend Chapter 7 Chapter 7 "Towns, Villages and Retail Development", section 7.5.2.1 Major Town Centres, Dundrum, Add additional line after A focus of the LAP preparation will be on enhancing the multifunctional nature of Dundrum Major Town Centre as set out in RET4 above.</u></i></p> <p><i><u>The LAP will be informed by the Dundrum ACA.</u></i></p>
viii) Waldemar Terrace is not included in the Dundrum proposed candidate ACA area, however, it contains the best example of wiggling (a form of pointing)	<b><u>B0271</u></b>	1	<p>The Executive notes the issue raised.</p> <p>The Draft Plan includes a combination of policies designed to protect those older buildings which, although not Protected Structures, are considered to make a positive contribution to the streetscapes. These include Policy HER20: Buildings of Vernacular and Heritage Interest, which encourages the rehabilitation and reuse of older structures, and ensure that appropriate materials be used to carry out any repairs to the historic fabric, Policy HER21: Nineteenth and Twentieth Century Buildings, Estates and Features, which seeks to ensure the character of such buildings are not compromised and encourages the retention of features that contribute to their character.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
ix) The submission requests that the Plan enhance, restore and protect the three Victorian Residential Garden Squares in Dún Laoghaire i.e. Clarinda Park,	<b><u>B0524</u></b>	3	The Executive notes the issue raised.

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
Crosthwaite Park, Royal Terrace ACAs in the Development Plan.			<p><b>Works to Clarinda Park and surrounds are a Parks and Municipal Services operational matter. They are not a County Development Plan matter.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
x) The submission requests that the Royal Terrace Architectural Conservation Area be extended to include the houses on Carlisle Terrace (Tivoli Road), Dún Laoghaire.	<b><u>B0691</u></b>	3	<p>The Executive notes the issue raised.</p> <p>Carlisle Terrace (RPS 1151-1161) are designated Protected Structures. The Executive does not agree with the submission to include these structures within the Royal Terrace Architectural Conservation Area (ACA). The latter is an architectural set piece designed around a central square with gate piers flanking the entrance from Corrig Road to both Royal Terrace East and West. Carlisle Terrace is not part of this urban designed square.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
xi) Submission notes that Kilgobbin Road's historic landmarks include Kilgobbin Church and cemetery, Kilgobbin Castle, Kilgobbin Cross, the Pale ditch, an original milestone, Oldtown House (1690s), as well as other notable houses from the 1700 and 1800s. As such, Kilgobbin Road should be designated an ACA in the Draft Plan.	<b><u>B0744</u></b>	8 9 10	<p>The Executive notes the issue raised.</p> <p>All the structures referred to in the submission are either listed in the RMP or the RPS.</p> <p>Only 'Oldtown House' and 'Kilgobbin Castle' are located on Kilgobbin Road. The other sites, 'Kilgobbin Church' and 'Cemetery' are located on Kilgobbin Lane, while the 'Pale Ditch' is located on lands to the south of Ballyogan Road.</p> <p>Kilgobbin Road has a dispersed settlement pattern, in terms of built heritage, there are some isolated sites of architectural and archaeological heritage, with no concentration of structures of architectural heritage significance which would warrant designation as an ACA.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
xii) An Taisce suggest that the garden squares in Monkstown and Dún Laoghaire be listed as ACAs.	<b><u>B0794</u></b>		<p>The Executive notes the issues raised.</p> <p>The submission does not provide the names of the squares that they are referring to. The garden squares of Dún Laoghaire are designated as ACAs these include, Clarinda Park,</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>Crosthwaite Park and Royal Terrace, while Belgrave Square and Eaton Square lie within Monkstown ACA.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>xiii) Submission requests that Ivy Grove (RPS No. 2092), Eglinton House (RPS No. 2093) and Eglinton Lodge (RPS No. 2094), should be made an ACA instead of being added to the RPS.</p>	<b>B0921</b>	1	<p>The Executive notes the issue raised.</p> <p>The Executive considers these four buildings to meet one or more of the categories of special interest to warrant inclusion onto the Record of Protected Structures, in accordance with Section 51(1) of the Planning and Development Act, 2000, as amended.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xiv) The submission notes that a section of Adelaide Road and Marlborough Road in Glenageary has been designated a candidate Architectural Conservation Area (cACA) since at least 2004. The Council should reconsider the omission of Adelaide Road from the ACA in the Draft Plan.</p>	<b>B1038</b>	3 7	<p>The Executive notes the issue raised.</p> <p>While designating Silchester Road an ACA and proposing Marlborough Road as an ACA, the section along Adelaide Road and Station Road remains a candidate ACA (cACA). This is shown in Map 7. It is the intention of the Executive to assess cACAs to determine if they meet the requirements and criteria for re-designation as ACAs as per Policy Objective HER17.</p> <p><b>Recommendation</b> Amend, Table 4.3 'Candidate Architectural Conservation Areas', Appendix 4 of the Draft Plan to include:  "Adelaide Road and Station Road"  Amend Map 3 and Map 7 to include boundary to same.</p>
<p>xv) The Proposed Candidate ACA on Dundrum Main Street consists of DRLP properties including Glenville Terrace and adjoining properties to the south. Noting the position that pertained in the previously granted developments that Glenville Terrace should be retained, the other properties to</p>	<b>B1072</b>	1	<p>The Executive notes the issue raised.</p> <p>Numbers 8 and 13, 13 a form part of a proposed cACA which it is recommended be brought forward to full ACA status upon adoption of the Plan. Number 15 (as currently numbered, i.e Essence Patisserie and the Barbers) does not fall within the proposed ACA. The argument that numbers 8 and 13 should be removed from the proposed candidate ACA because of a previous permission granted is not accepted as an adequate rationale for their removal.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
the immediate south must be removed from this area (No's 8, 13 and 15 Main Street).			<p><b>Recommendation</b> See response and recommendation above.</p>
xvi) Submission requests that a site referred to as 32 Killiney Heath is removed from the Killiney Architectural Conservation Area (ACA) in line with the Council resolution / report C/342 of the Council meeting 6/7/2009.	<b>B1080</b>	7	<p>The Executive notes the issues raised.</p> <p>The submission relates to whether lands at what is referred to as 32 Killiney Heath should be included in the Killiney ACA. The submission includes details relating to the adoption of the ACA with the subject site included within the ACA. The adoption of the ACA took place at a Council meeting held in February 2011. The minutes indicate that the inclusion of the subject site was, following a submission made on the proposed variation, assessed and included within the Adopted ACA. Reference is also included to an earlier Council meeting held in 2009 where the ACA was also discussed but was not ultimately adopted. The recommended ACA boundary as put forward at the 2009 meeting did not include the subject site but included the wall to Killiney Hill Road.</p> <p>The submission provides a considerable history for the area and considers that the lands in question have no association physically or historically with either properties of Ashton or Hill Side House. The submission quotes from page 31 of the Character Appraisal report for Killiney ACA, 2010 which states that - "<i>Killiney Heath has no unique architectural or landscape features that give sufficient reason for it to be included in an ACA. It is recommended that it should be excluded.</i>" It is noted however that the same appraisal report does not show the subject site as falling within the boundaries of what is termed to be Killiney Heath. The site in question is included within the area termed "South East Slope" which was recommended for inclusion in the ACA.</p> <p>The site in question has been re-examined by the Conservation Section to see if there is merit in amending the boundary of the ACA. The conservation office has reported that the site contains no structures and does not have any apparent relationship with adjoining properties. Save for an original random rubble wall along its boundary with Killiney Hill Road, there are no structures of value that contribute to the character of the ACA. It is therefore considered reasonable to omit this site from the ACA boundary. The boundary wall with Killiney Hill Road, as per the recommendation in 2009, however, should be retained in the ACA.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>Amend Map 7 to alter the boundary of the Killiney ACA to remove the site at 32 Killiney Heath but retain the boundary wall along Killiney Hill Road within same.</p> <p>Amend map 7 to realign the boundary of the current 0/0 to follow the amended ACA boundary. See also the recommendation with regard to the 0/0 objective under Section 2.1 of this report.</p>
<p>xvii) Submission notes it is very disappointing that only 5 of the 15 cACA's in Table 4.3 are proposed to be adopted as part of the Plan.</p>	<b>B1093</b>		<p>The Executive notes the issue raised.</p> <p>The proposed ACAs being included in the Draft Plan were assessed with character appraisal reports prepared in advance of the Draft Plan. As per table 4.3 of Appendix 4 only eight cACAs remain to be fully assessed in line with Policy Objective HER17 of the Draft Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xviii) The submission requests that the Metals Candidate ACA, should be prioritised as an ACA to protect the unique character.</p> <p>At a minimum, that part of The Metals that runs between Dalkey Avenue and Ardbrough Road (known as THE FLAGS) should be afforded protection as an ACA, given its great historic importance and to discourage attempts at unsuitable development.</p> <p>The importance of The Metals is acknowledged again in the Draft County Development Plan 2022-2028 (Policy Objective HER28; SLO 27).</p>	<b>B1093</b> <b>B1117</b>	3 4	<p>The Executive notes the issue raised.</p> <p>The Metals is one of eight cACAs included in Appendix 4 of the Draft Plan. It is the intention of the Executive to assess and bring forward The Metals cACA along with the other cACA's with a view of redesignation as ACAs.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xix) The submission supports the removal of 'Candidate ACA' status from Adelaide Road and in particular at Adelaide House. The submission supports the upgrade of Marlborough Road to full 'ACA' status.</p>	<b>B1133</b>	3 7	<p>The Executive notes the issue raised.</p> <p>The candidate ACA (cACA) along Adelaide Road is not proposed to be removed.</p> <p>While designating Silchester Road ACA and proposing Marlborough Road ACA, the section along Adelaide Road and Station Road remains a candidate ACA (cACA). This is shown in Map</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>7. It is the intention of the Executive to assess cACAs to determine if they meet the requirements and criteria for re-designation as ACAs as per Policy Objective HER17.</p> <p><b>Recommendation</b> Amend, Table 4.3 'Candidate Architectural Conservation Areas', Appendix 4 of the Draft Plan to include:</p> <p><i>"Adelaide Road and Station Road"</i></p> <p>Amend Map 3 and Map 7 to include boundary to same.</p>
<p>xx) The submission in support of the proposal to remove 'Candidate ACA' status from a section of Station Road and to upgrade the area of Marlborough Road to full 'ACA' status.</p>	<p><b>B1173</b></p>	<p>3 7</p>	<p>The Executive notes the issue raised. The candidate ACA (cACA) along Station Road is not proposed to be removed.</p> <p>While designating Silchester Road ACA and proposing Marlborough Road ACA, the section along Adelaide Road and Station Road remains a candidate ACA (cACA). This is shown in Map 7. It is the intention of the Executive to assess cACAs to determine if they meet the requirements and criteria for re-designation as ACAs as per Policy Objective HER17.</p> <p><b>Recommendation</b> Amend, Table 4.3 'Candidate Architectural Conservation Areas', Appendix 4 of the Draft Plan to include:</p> <p><i>"Adelaide Road and Station Road"</i></p> <p>Amend Map 3 and Map 7 to include boundary to same.</p>
<p>xxi) The submission relates to Waltham Terrace Candidate Architectural Conservation Area and includes a letter from the owner of No. 33 Waltham Terrace and a letter from the Royal Institute of Architects of Ireland with respect to the prescription of the use of the title 'architect' in Ireland as per the Building Control Act, 2007.</p>	<p><b>B1217</b></p>	<p>2</p>	<p><b>The Executive notes the issue raised, however, this is not a County Development Plan matter.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p><b>3.19.3: RMP</b></p>			

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
xxii) Ensure that the County's historic monuments are protected and restore access to all as these are currently inaccessible to residents.	<b><u>B1113</u></b>		<p>The Executive notes the issue raised.</p> <p>It is an aim of the DLR Draft Heritage Plan to improve access to historic sites in the County. The Draft Plan also promotes access under Policy Objective HER1: Protection of Archaeological Heritage.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
xxiii) Submission requests that Markievicz Cottage on the Blackglan Road is designated a national monument.  Markievicz Cottage is in ruins and is unprotected.	<b><u>B1122</u></b>	5	<p>The Executive notes the issue raised.</p> <p>The National Monument Service of Ireland is responsible for designating national monuments. <b>It is beyond the remit of the Local Authority to place any new items onto the Record of Monuments and Place (RMP).</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.19.4: Industrial Heritage</b>			
i) Submission requests the inclusion of sewer breather pipes erected by Rathdown Rural District Council No. 1 onto the Industrial Heritage Survey. Submission makes specific reference to 4 sewer breather pipes to the Industrial Heritage Survey at: <ul style="list-style-type: none"> <li>• Sandyford Road Dundrum</li> <li>• St. Luke's Crescent Dundrum</li> <li>• Brighton Road Foxrock</li> <li>• Milltown Bridge Road opposite Bankside Cottages</li> </ul>	<b><u>B0042</u></b> <b><u>B0921</u></b>	1	<p>The Executive notes the requested additions to the Industrial Heritage Survey.</p> <p>These sewer breather pipes were not recorded on the Industrial Heritage Survey of the County carried out in 2004. In order to capture and assess all pipes within the County a complete survey and assessment of the items would be required. Given the time required to carry out such a survey, it is not feasible to include these items at this stage of the County Development Plan process, rather, it is proposed that a full review of the Industrial Heritage Survey would be carried out during the lifetime of this plan. The sewer breather pipes in the County would be assessed for inclusion onto the survey during its review.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

**3.20: Appendix 5 - Building Heights Strategy (see also section 3.29 Appendix 17 SUFP)**

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<b>3.20.1: General</b>			
<p>i) Submission welcomes some content of Building Heights Strategy and in the light of the publication of the <i>Climate Action and Low Carbon Development (Amendment) Bill</i> requests additional criterion be added to Appendix 5, Section 5 as follows:</p> <ul style="list-style-type: none"> <li>Proposals must demonstrate maximum energy efficiency to align with climate policy. Building height must have regard to the relative energy cost of higher buildings and expected embodied carbon emissions over the lifetime of the development. The latest building energy efficiency studies should be considered when proposed development is submitted.</li> <li>Request that environmental impacts of building height is taken into consideration.</li> </ul>	<p><b><u>B0271</u></b> <b><u>B0529</u></b></p>		<p>The Executive notes the issues raised.</p> <p>The Executive would not be in favour of adding the additional criteria proposed to table 5.1 as to date the Planning Authority do not yet have the national guidance required to assess maximum energy efficiency to align with climate policy. It is considered appropriate to await government guidance on the issue as opposed to relying on latest energy efficiency studies. The area may also fall under a code separate to Planning (Building regulations) and as such may not be appropriate to include within a Development Plan</p> <p>See recommendation in section above regarding a possible variation to the Plan as set out in section 2.1 in relation to the OPR observation.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>ii) Request that the County Development Plan be amended so that Policy Objective BHS 1 – Building Height does not apply to land zoned Objective A in order to protect residential amenity.</p>	<p><b><u>B1125</u></b></p>		<p>The Executive notes the issues raised but would not concur with the amendment proposed</p> <p>Policy Objective BHS 1 states that <i>“It is a Policy Objective to support the consideration of increased heights and also to consider taller buildings where appropriate in the Major Town Centres of Dún Laoghaire and Dundrum, the District Centres of Nutgrove, Stillorgan, Blackrock, and Cornelscourt, within the Sandyford UFP area, UCD and in suitable areas well served by public transport links (i.e. within 1000 metre/10 minute walk band of LUAS stop, DART Stations or Core/Quality Bus Corridor, 500 metre/5 minute walk band of Bus Priority Route) provided that proposals ensure a balance between the reasonable protection of existing amenities and environmental sensitivities, protection of residential amenity and the established character of the area”</i>. To exclude any lands which are subject to land use zoning objective A would exclude significant portions of the built up area of the County which are located close to public transport and are earmarked for compact growth which includes height. This would not accord with national policy.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>iii) Submissions raise the following issues:</p> <ul style="list-style-type: none"> <li>Note the serious affordability issues.</li> <li>Note the significant body of data highlighting the higher costs of higher/taller apartment buildings. Requests that Appendix 5 is amended to include additional performance based criterion as follows:</li> <li>Proposals must demonstrate how any proposed building height impacts on the affordability of units in the development, having regard to the County Development Plan Housing Strategy.</li> </ul>	<p><b><u>B0271</u></b> <b><u>B0529</u></b></p>		<p>No change to Draft Plan</p> <p>The Executive notes the issues raised.</p> <p>The Executive would not be in favour of adding the additional criteria proposed to table 5.1. Table 5.1 relates to Performance Based Development Management Criteria for assessing taller buildings as set out in section 3.of the Building Height Guidelines. These criteria are centred around how a building relates to the surrounding area at 3 different levels – town, street and building level. County specific criteria are also included having regard to the nature of the physical environment in the County. Whilst it is appreciated that affordability is an issue in the County, it is not considered to be a relevant performance base criterion in terms of consistency with SPPR 3 of the Height Guidelines.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>iv) Submission refers to potential for landmarks buildings set out in Appendix 5 and requests that the developer of any such proposal demonstrates meaningful engagement with local communities at early design stage.</p>	<p><b><u>B0529</u></b></p>		<p>The Chief Executive notes the issues raised. There is no statutory requirement for any developer to engage with the community prior to lodgement of any planning application so it is not something that the Development Plan can stipulate. Many applicants do however, engage with local communities on proposals they may have for any area. Local communities can however feed into the development of policy via submissions on local area plans and can also make submissions on any planning application.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>v) Submission state as follows:</p> <ul style="list-style-type: none"> <li>Various submissions consider that the additional Criteria set out in table 5.1 of the Building Height Strategy should be omitted as they are in conflict with SPPR 3 of the Section 28 Guidelines.</li> <li>Draft Plan should be amended to ensure where proposals meet section 3,2 of the guidelines, the planning authority can grant permission even where specific objectives may indicate otherwise</li> </ul>	<p><b><u>B0581</u></b> <b><u>B0801</u></b> <b><u>B0805</u></b> <b><u>B0811</u></b> <b><u>B0823</u></b> <b><u>B0831</u></b> <b><u>B0836</u></b> <b><u>B0843</u></b> <b><u>B0848</u></b> <b><u>B0889</u></b> <b><u>B0891</u></b></p>		<p>The Chief Executive notes the issues raised.</p> <p>Numerous submissions consider that the additional performance based criteria set out in table 5.1 of the Building heights Strategy are overly onerous and do not accord with SPPR 3 of the section 28 Guidelines. The Chief Executive would not concur. Having regard to the Urban Development and Building Heights Guidelines, there is nothing that precludes the Planning Authority from including additional County specific criteria which recognise the rich architectural heritage particularly along the coast, the mountains. Furthermore, it is noted that the OPR have not raised any issues in terms of consistency with SPPR 3 and have in fact have “<i>identified the proactive approach to accommodating buildings of height in the County under it’s Building height Strategy</i>”.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<ul style="list-style-type: none"> <li>The Building Height Strategy states that subject to the implementation of performance based criteria for assessing height (at Section 5 of the Appendix), that ‘SPPR 3 (1) and (2) have been incorporated into DLR policy and includes the line <i>“the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise” is defunct as policy is consistent with the SPPR’</i>. Submissions request that the above should be omitted from the Draft Plan.</li> <li>Request that the SUFP is reviewed and amended to reflect the content of the Height Guidelines.</li> <li>Omit specific height guidance to reflect ‘Urban Development &amp; Building Height’ Guidelines 2018’; • Amend Appendix 5 Building Height Strategy to fully reflect the ‘Urban Development &amp; Building Height’ Guidelines 2018;</li> <li>BHS considered overly onerous as it states that subject to implementation of the performance based criteria that SPPR 3 (10 and (2) have been incorporated into dlr policy.</li> <li>Building heights Strategy is not consistent with Section 28 Guidelines as it undermines an applicant’s ability to obtain permission under SPPR 3. Request omission of policy approach and additional criteria as set out in BHS.</li> </ul>	<p><b><u>B0960</u></b>  <b><u>B0999</u></b>  <b><u>B1004</u></b>  <b><u>B1043</u></b>  <b><u>B1244</u></b></p>		<p>Whilst it specifically pertains to densities the recent ministerial circular letter: NRUP 02/2021 is also of note as this remarks that <i>“towns and their contexts are clearly not all the same, and planning policy and guidance are intended to facilitate proportionate and tailored approaches to residential development”</i> thus recognising that there is scope for more bespoke policies in a particular area.</p> <p>Policy objectives BHS 1, 2 and 3 as contained in Appendix 5 of the Draft Plan are clear that there may be instances where additional height may be appropriate and in those instances the criteria in table 5.1 kicks in regardless of other specific objectives in Local Area Plans or in Urban Framework Plans contained in the County Development Plan. Given that the criteria as set out in SPPR 3 have been subsumed into the Draft Plan in table 5.1 it is considered that future assessment in accordance with the 2022 – 2028 County Plan will render SPPR 3 redundant as all criteria are contained in the Draft Plan.</p> <p>As set out in section 4.2 of the Building Heights Strategy Local Area Plans were considered by the Planning Authority to be the appropriate location for identifying areas for increased heights as per SPPR 1 of the Guidelines. Section 4,2 also sets out in detail how each Local Area Plan and Urban Framework Plan aligns with the guidelines. The SUFP is included under section 4.2.8, where it is set out that further increases in height can be assessed against the performance base criteria in table 5.1.</p> <p><b>Recommendation</b>  No change to Draft Plan</p>
<p>vi) Considers that section 2, <i>Understanding Building Heights</i> of Appendix 5 makes a compelling case which is endorsed in terms of the argument against</p>	<p><b><u>B0637</u></b>  <b><u>B0638</u></b></p>		<p>The Chief Executive notes the issues raised.</p> <p>Support for elements of Appendix 5 is welcomed.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>higher buildings in conservation areas. Detail is set out in relation to impact of height on historic fabric.</p> <p>Submission supports sections 2.31, 2.3.2, 2.3.3, 2.3.4, and section 3.3 of the Building Height Strategy.</p>			<p><b>Recommendation</b> No change to Draft Plan</p>
<p>vii) All new buildings should not exceed 4 storeys in height in order to preserve the sight of the natural landscape.</p>	<b><u>B0797</u></b>		<p>The Chief Executive notes the issues raised. To limit all new building to 4 storeys would not allow for appropriate compact growth and would not be consistent with National Policy as out in the NPF or the Section 28 Guidelines pertaining to height.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>viii) Numerical limitations on heights as set out in the SUFP conflict with SPPR1.</p> <p>Policy Objective BH2 is in contravention of the Building Height Guidelines namely SPPR1 which requires planning authorities to explicitly identify areas where increased height will be actively pursued while removing blanket numerical height limitations</p>	<b><u>B0823</u></b> <b><u>B0889</u></b> <b><u>B0999</u></b> <b><u>B1244</u></b>		<p>The Chief Executive notes the issue raised.</p> <p>The Executive would not concur. SPPR 1 requires Planning Authorities to explicitly identify, through their statutory plans areas where increased building heights will be actively pursued. DLR does this via Local Area Plans and the Urban Framework Plans and the SUFP area is one such area identified for increased height. The guidelines reference that such areas could accommodate a cluster of higher buildings but this is not taken as an indication that every site within the SUFP area is suitable for increased height. The guidelines reference the need for master planning exercises to deal with public realm and design as these are issues best dealt with at neighbourhood level rather than individual sites level. The SUFP provides this nuanced masterplan guidance in relation to the wider area.</p> <p>As set out in section 4.2 of the Building Heights Strategy Local Area Plans and Urban Framework Plans contained in the Draft Plan were considered by the Planning Authority to be the appropriate location for identifying areas for increased heights as per SPPR 1 of the Guidelines. The SUFP is included under section 4.2.8 of the Building Heights Strategy, where it is set out that further increases above those in the SUFP can be assessed against the performance base criteria in table 5.1. This allows an applicant put forward an argument for additional height in the SUFP area thus ensuring no blanket restrictions.</p> <p><b>Recommendation</b> No change to Draft Plan</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>ix) Policy Objective BH2 is considered overly prescriptive with regard to heights where an LAP is in place for example within the confines of the Sandyford Urban Framework Plan. The proposed heights policy in particular fails to have regard to recent permissions granted above the Sandyford UDF limits for example at the Former Avid Site (ABP Ref. 303467), the Rockbrook site (ABP Ref. 304405) and the Former Aldi site (ABP Ref. 305940).</p>	<p><b>B0999</b></p>		<p>The Chief Executive notes the issues raised.</p> <p>As set out in section 4.2 of the Building Heights Strategy Local Area Plans and Urban Framework Plans contained in the Draft Plan were considered by the Planning Authority to be the appropriate location for identifying areas for increased heights as per SPPR 1 of the Guidelines. The SUFP is included under section 4.2.8 of the Building Heights Strategy, where it is set out that further increases can be assessed against the performance base criteria in table 5.1. This allows an applicant put forward an argument for additional height in the SUFP area.</p> <p>Submission references policy BH2 of the Draft Plan. It is considered that this reference is meant to be to Policy Objective BHS 2 of the Draft Plan. It is not considered that either BH2 of the SUFP, or Policy Objective BHS 2 of the Draft Plan contravenes SPPR1 of the Section 28 Building Heights Guidelines as policy BHS2 of Appendix 5, Building Heights Strategy of the Draft Plan allows an applicant but forward a proposal for additional height in the SUFP area.</p> <p>It is noted that there is a small anomaly in section 3.2.1. of the SUFP where policy BH 1 and BH2 of the Draft Plan are referenced. This should read BHS 1 and BHS 2.</p> <p><b>Recommendation</b> Amend section 3.2.1 of Appendix 17 Draft SUFP (pg: 21) from:</p> <p><i>“3.2.1 Policy SUFP 3 Building Height in Sandyford Business District It is Council Policy that building height in Sandyford Business District accords with the height limits indicated on Building Height Map 3, subject to Policy Objectives BH1 and BH2 of the Dún Laoghaire-Rathdown County Development Plan 2022-2028</i></p> <p>To</p> <p><i>“3.2.1 Policy SUFP 3 Building Height in Sandyford Business District It is Council Policy that building height in Sandyford Business District accords with the height limits indicated on Building Height Map 3, subject to Policy Objectives BHS<sub>1</sub> and BHS<sub>2</sub> of the Dún Laoghaire-Rathdown County Development Plan 2022-2028”</i></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>x) BH3 proposes a general building height of 3 to 4 storeys in 'residual suburban areas'. The Building Height Guidelines reference an objective for a default objective of 4 storeys to provide substantially more population growth within existing built-up areas. The policy should therefore be amended.</p>	<b><u>B0999</u></b>		<p>The Chief Executive notes the issue raised.</p> <p>The Section 28 guidelines states as follows;</p> <p><i>Therefore, these guidelines require that the scope to consider general building heights of at least three to four storeys, coupled with appropriate density, in locations outside what would be defined as city and town centre areas, and which would include suburban areas, must be supported in principle at development plan and development management levels.</i></p> <p>It is clear that the reference in the guidelines is to at least <b>3 to 4 storeys</b> not at least 4 storeys as stated in the submission.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>xi) Supports Policy Objective BHS 1 – Increased Height</p>	<b><u>B0831</u></b> <b><u>B0848</u></b>		<p>The Chief Executive notes the issue raised.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>xii) Concern that Council are continuing to apply a Building Height Strategy that was introduced under variation 5 of the County Development Plan 2010 – 2016.</p> <p>Council may not apply a blanket limit of building height</p>	<b><u>B1120</u></b> <b><u>B1145</u></b>		<p>The Chief Executive would not concur with the issues raised.</p> <p>Appendix 5 which sets out the Building Heights Strategy has been comprehensively reviewed and the Draft Plan contains a strategy that introduces new policy elements so as to accord with the Urban Development and Building Height Guidelines.</p> <p>Use of table 5.1 ensures that arguments can be made for increased height thus ensuring no blanket restrictions.</p> <p>It is noted that the OPR have not raised any issues in terms of consistency with SPPR 3 and have in fact have "<i>identified the proactive approach to accommodating buildings of height in the County under it's Building height Strategy</i>".</p> <p><b>Recommendation</b> No change to Draft Plan</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>xiii) Much of the County is limited to 2- 4 storeys which runs contrary to the Guidelines. Council is invited to expand objective so as to allow additional building height on a case by case basis.</p>	<p><b><u>B1120</u></b> <b><u>B1145</u></b></p>		<p>The Chief Executive notes the issue raised.</p> <p>The Chief Executive would not concur with this submission. The Policy Objectives set out in Appendix 5 Building Height Strategy allow, in many parts of the County, for a case to be put forward for additional height once a proposal meets the performance base criteria set out in table 5.1</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>xiv) Urge dlr to give full effect to the Building heights Guidelines in Cherrywood. A similar performance based criteria approach as set out in the Draft Plan is required.</p> <p>Request that Cherrywood be covered by Policy Objective BHS 1</p>	<p><b><u>B1067</u></b> <b><u>B1120</u></b> <b><u>B1145</u></b></p>		<p>The Chief Executive notes the issues raised.</p> <p>The Cherrywood Planning Scheme is made and amended under a sperate legislative process to the County Development Plan. Development of any site that falls or partly falls with the Planning Scheme boundary is required to align with the provisions of the SDZ Planning Scheme. The process for amending the scheme is sperate to the County Development Plan process.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>xv) Request that the statement in Chapter 4 Policy Objective PHP 20 'On all developments with height proposals greater than 4 storeys the applicant should provide a height compliance report indicating how the proposal conforms to the relevant Building Height Performance Based Criteria' should be omitted as it is contrary to sustainable development, would set too low a density and would make extra work for applicant. Alternatively, it should be revised to 6 storeys</p>	<p><b><u>B1206</u></b></p>		<p>The Executive notes the issue raised but would not concur.</p> <p>Submission of a height compliance report will allow for a thorough assessment of height in an application. Submission of the report will have no impact on density as the density proposed in any scheme over 4 storeys will remain as proposed regardless of whether a report on height is submitted. The argument that it will make extra work for the applicant is quite simply not a plausible reason to exclude submission of any supporting report as part of any planning application. The reason 4 storeys is chosen is to align with the Building Height Guidelines which states that <i>"these guidelines require that the scope to consider general building heights of at least three to four storeys, coupled with appropriate density, in locations outside what would be defined as city and town centre areas, and which would include suburban areas, must be supported in principle at development plan and development management levels"</i></p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
No change to Draft Plan.			
<b>3.20.2: Area Specific Height Issues</b>			
i) Residential buildings of six to eight storeys in Dundrum generally should be considered only where they will be in harmony with the other buildings in the immediate area.	<b><u>B0271</u></b>		<p>The Executive notes the issues raised and would agree with the sentiment.</p> <p>Table 5,1 of the Appendix 5 Building Height Strategy provides assessment criteria for taller buildings so as to ensure that buildings are in harmony with other buildings in the immediate area.</p> <p>Relevant criteria include;</p> <ul style="list-style-type: none"> <li>• <i>Proposal must respond to its overall natural and built environment and make a positive contribution to the urban neighbourhood and streetscape</i></li> <li>• <i>Proposal must respect the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring properties</i></li> <li>• <i>Proposal should ensure no significant adverse impact on adjoining properties by way of overlooking overbearing</i></li> <li>• <i>Proposal should make a positive contribution to place making, incorporating new streets where appropriate, using massing and height to achieve densities but with variety and scale and form to respond to scale of adjoining development.</i></li> </ul> <p><b>Recommendation</b> No change to Draft Plan</p>
ii) Submission considers that 14 storey buildings are not appropriate on the Central Mental Hospital site. Heights should be four storeys maximum.	<b><u>B0437</u></b>	1	<p>The Chief Executive notes the issue raised. The issue of suitable heights on the CMH site will be assessed in according with the relevant Development Plan policies and Section 28 Guidelines as part of any planning application.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
iii) Stillorgan Road is considered to be an appropriate location for intensification of development and increased building height. This should be supported in the Draft Plan.	<b><u>B0836</u></b> <b><u>B0848</u></b>		<p>The Chief Executive notes the issue raised.</p> <p>The Policies and objectives of the County Development Plan 2022 – 2028 will take precedence over policies and objectives contained in the Stillorgan Local Area Plan 2018 - 2024</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>Considers that the height parameters set out in the Stillorgan LAP are contrary to SPPR 1 of the Building heights Guidelines in that they set out blanket restrictions. Considers SPPRs 2 and 3 are still applicable.</p> <p>Requests review of Stillorgan LAP to be aligned with Building Height Guidelines.</p> <p>Recommend addition of an SLO for a Landmark Building on the Blakes and Esmonde Motors site.</p>			<p>Section 4.2.3 of Appendix 5 sets out how the Stillorgan LAP aligns with the Building Height Guidelines.</p> <p>As the Policy Objectives of the Draft Plan allow for an applicant to be put forward on a case by case basis an argument for increased heights it is not considered that an additional SLO is required for the Esmonde Motors and Blakes site.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>iv) Request that the 2-3 storey building height limit on the Leopardstown Hospital lands is omitted from the draft SUFP Map 3. The subject lands are appropriate for increased heights given its location directly adjoining the Luas Green Line Central Park Station, and adjacent to the residential development at Central Park with existing heights of generally 10 to 17 storeys. Request permissible heights of 6 – 8 storeys for the Legionaries site if Map 3 not removed.</p>	<p><b><u>B0843</u></b> <b><u>B1244</u></b></p>		<p>The Chief Executive notes the issue raised.</p> <p>BH5 of the Draft SUFP states as follows;  <i>“BH5 SUFP Additional height may be permitted where it can be demonstrated that additional height over the height limits identified on Map 3 accords with Policy Objective BHS1 and BHS2, of the Dún Laoghaire-Rathdown County Development Plan 2022-2028, Appendix 5 subject to complying with the safeguards outlined in these policies as set out in Table 5.1 of the BH Strategy and any other development limits/phasing set out in the SUFP. Any application for increased height or taller buildings over and above the parameters set out in Map 3 shall be subject to assessment under Policy Objective BHS1 and BHS2 of the County Development Plan”.</i></p> <p>This Policy Objective allows an applicant put forward a case for increased height which can be assessed in accordance with the performance based criteria set out in table 5.1 of Appendix 5.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>v) Submission requests that building heights on the Library site and lands to the north (zoned MTC) in the vicinity of St Nahi's Church in Dundrum should take existing structures in the surrounding area into consideration.</p>	<p><b><u>B0965</u></b></p>	<p>1</p>	<p>Any proposal for increased height at this location would be required to accord with the Building Height Strategy and would need to take into account existing structures. This would be assessed at application stage.</p> <p><b>Recommendation</b> No change to Draft Plan</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
vi) Important to manage the transition from residential to rural within Map 9 and ensure that building heights are lower (2 to 3 storeys) in areas adjacent to agricultural and high amenity land.	<b>B1199</b>	9	<p>The Chief Executive notes the issue raised and agree with the sentiment.</p> <p>Map 9 covers number of areas including parts of Kiltiernan Glenamuck and Stepside which adjoin agricultural and high amenity lands. Table 5.1 of the Building Height Strategy sets out performance based criteria for assessment of taller buildings and includes the following; <i>“having regard to the high quality mountain foothill landscape that characterises parts of the County any proposals for increased heights and/or taller building in this area should ensure appropriate scale, height and massing so as to avoid being obtrusive. An urban design study and visual impact assessment study should be submitted.”</i></p> <p>Section 4,2 of The Kiltiernan Glenamuck Local Area plan addresses urban Design and sets out built form objectives and what are termed housing design issues which include very detailed guidance in relation to the area west of the Enniskerry Road where the Plan lands adjoin the foothills of the Dublin Mountains. heights of 2-3 storeys are encouraged with the 3-storey element to be focused along the interface with Enniskerry Road. It is stated that <i>“The design of buildings, which would include a range of dwelling types, shall have strict regard for topography and existing surrounding developments, and the 3-storey elements shall be subject to qualitative criteria in terms of building design, the merits of the proposal, elevation and the need to retain views to the Dublin Mountains to the south-west.”</i></p> <p><b>Recommendation</b> No change to Draft Plan</p>
vii) In a resident's survey undertaken by the submitter, the highest-ranking concern of respondents was building height with residents generally supporting height of no more than 4 storeys within 100m of their homes. Concern relates particularly to the Dundrum CMH site.	<b>B1125</b>	1	<p>Any proposal for increased height at this location would be required to accord with the Building Height Strategy. To limit development to 4 storeys would not accord with National policy as set out in the NPF or in Section 28 Guidelines on Height.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
viii) New structures on Dundrum Main Street should maintain the original low-rise scale. Building heights in new development further back from the street can be built to a higher scale but with a stepped back approach so as not to overwhelm the atmosphere of the Main Street.	<b>B1124</b>	1	<p>Any proposal for increased height at this location would be required to accord with the Building Height Strategy and would need to take into account existing structures. This would be assessed at application stage.</p> <p><b>Recommendation</b> No change to Draft Plan</p>

### 3.21: Appendix 7 Sustainable Drainage System Measures

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>i) <b>Drainage and Attenuation</b></p> <ul style="list-style-type: none"> <li>This submission is accompanied by a technical submission note on water and drainage issues which raises the following;</li> <li>The requirement for drainage design to be subject to an additional design factor of 1.3 to account for Climate Change represents an extreme future scenario.</li> <li>The application of an additional design factor of 1.1 to account for ‘urban creep’, combined with the foregoing requirement in relation to climate change would have a significant impact on pipe sizing and attenuation volumes for new development, resulting in significant cost and design impacts.</li> <li>The requirement for utility clash detection at planning stage would result in significant cost and time implications, with detailed utility surveys and detailed design coordination of utilities more appropriately taking place post-planning, via condition of planning or similar.</li> <li>Requirements in respect of pumped surface water design solutions set out in Appendix 7 would have further significant impact on storage volumes and structural design for new development</li> <li>The requirement that hard standing / parking areas not be discharged to public sewers and that these areas be infiltrated locally will not always be practicable in new developments.</li> </ul>	<p><b>B0848</b> <b>B0981</b></p>		<p>The Executive notes the issues raised.</p> <p>The Executive considers that the climate change factor can be reduced to 1.2. The urban creep factor will remain at 1.1.</p> <p>The utility clash check required is a desktop exercise in most instances. In some instances, more detailed checks will be required where a potentially significant clash has been identified. These checks are required at planning stage to ensure designs are feasible prior to granting of planning permission.</p> <p>Depths for extensive green roof are consistent with industry standards and recommendations. Several small amendments are proposed to clarify standards required.</p> <p>In relation to pumped surface water design a small amendment is proposed to address storage requirements.</p> <p>In relation to hard standing / parking areas a small amendment is proposed in relation to maximisation of local infiltration prior to discharge to the surface water drainage system.</p> <p><b>Recommendation</b> Update Appendix 7.1 Stormwater Management Policy, Section General Requirements, Climate Change:</p> <p>From:</p> <p><i>“All developments must apply a factor of 1.3 to their drainage design and attenuation volumes to accommodate climate change.”</i></p> <p>To:</p> <p><i>“All developments must apply a <u>minimum</u> factor of <del>1.3</del> 1.2 to their drainage design and attenuation volumes to accommodate climate change.”</i></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<ul style="list-style-type: none"> <li>• The increased 70% surface area requirement for green roofs (an uplift from the current 60% requirement) may not always be practicable or achievable depending on requirements for solar panels, plant, and equipment at roof level.</li> <li>• The suggested minimum substrate depth of 80mm for extensive green roofs is significantly greater than that outlined in the CIRIA SuDS Manual, which would result in a significant impact on structural design for new developments. In this regard the standard within the current Plan for 20-40 mm for sedum / moss type extensive green roofs would be preferable.</li> <li>• Request that current standards are retained in relation to climate change provision, attenuation, green roofs, and infiltration from areas of hard standing within developments.</li> </ul>			<p>Update Appendix 7.2 Green Roof Policy, Section 3.0 Green and Blue Roof Policy Standards, Standard GR2 – Aerial coverage Exemptions and Amplifications:</p> <p>From:  <i>“Extensive roofs are defined having a minimum substrate depth of 80mm and Intensive Roofs are defined as having a substrate minimum depth of 200mm. (Source; The GRO Green Roof Code).”</i></p> <p>To:  <i>“Extensive roofs are defined having a minimum substrate depth of 80mm <u>(or 60mm beneath vegetation blanket)</u> and Intensive Roofs are defined as having a substrate minimum depth of 200mm. (Source; The GRO Green Roof Code).”</i></p> <p>Update Appendix 7.1 Stormwater Management Policy, Section All Other Developments</p> <p>From:  <i>“Hardstanding/Parking Areas                  All proposed parking and hardstanding areas should not be discharged to the public sewer but must be infiltrated locally, via a specifically designed permeable paving/porous asphalt system, in accordance with the requirements of Section 12.4.8.3 Driveways/Hardstanding Areas of the DLRCC County Development Plan 2022-2028.”</i></p> <p>To:  <i>“Hardstanding/Parking Areas                  All proposed parking and hardstanding areas should <del>not be discharged to the public sewer but must be infiltrated locally</del> <u>maximise local infiltration before discharge to the surface water drainage system</u>, via a specifically designed permeable paving/porous asphalt system, in accordance with the requirements of Section 12.4.8.3 Driveways/Hardstanding Areas of the DLRCC County Development Plan 2022-2028.”</i></p> <p>Update Appendix 7.1 Stormwater Management Policy, Section General Requirements, Pumping of Surface Water, bullet point 4:</p> <p>From:</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><i>“• When the pumped discharge rate is limited to 2l/s/ha or Qbar for that portion of the site being served by the proposed pumping arrangement. Provision should be made for storage for events up to and including the 0.1% AEP event.”</i></p> <p>To:</p> <p><i>“•When the pumped discharge rate is limited to 2l/s/ha or Qbar for that portion of the site being served by the proposed pumping arrangement. <del>Provision should be made for storage for events up to and including the 0.1% AEP event.</del> <u>Storage (attenuation) is required up to and including the 1.0% AEP event but provision should also be made for containment of volumes in excess of the 1.0% event within the site/basement area in circumstances where pump failure occurs during critical storm events. For guidance, volumes for the 0.1% event should be considered.</u>”</i></p>
<p>ii) Submission notes that Section 7.1.1 of Appendix 7 requires that all developments must apply a factor of 1.3 to their drainage design and attenuation volumes to accommodate climate change and a factor of 1.1 to accommodate urban creep. This corresponds to a requirement that exceeds that envisaged for the High End Future Scenario (HEFS) in Table 5-1 of the Flood Risk Management Climate Change Sectoral Adaptation Plan. The Greater Dublin Regional Code of Practice for Drainage Works (v6.0) recommends a 10% increase in depth of rainfall for Climate Change. A climate change factor of 1.2 (corresponding to the Mid-range Future Scenario) in conjunction with the universal application of the urban creep factor of 1.1 should represent an appropriate allowance for climate change adaptation in drainage design. Revised wording under the Climate Change heading (Section 7.1.1) is sought as follows:</p>	<p><b><u>B1072</u></b></p>		<p>The Executive has considered the issues raised and recommends that the climate change factor be reduced to 1.2. The urban creep factor will remain at 1.1.</p> <p><b>Recommendation</b> See row above for recommendation.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<i>All developments must apply a factor of 1.2 to their drainage design and attenuation volumes to accommodate climate change."</i>			
iii) Submission suggests that Green Roof Policy in Appendix 7B should include reference to fire risk considerations associated with green roofs and in particular the mitigation measures required when locating photovoltaics on or adjacent to green roofs. The green roof policy should be aligned with Dublin Fire Brigade Fire Officer's requirements in respect of these issues.	<b>B1072</b>		<p>The Executive notes the issues raised.</p> <p>Appendix 7.2 Green Roof Policy offers sufficient flexibility to enable applicants to accommodate a variety of design options at roof level, such as PV panels, building plant equipment, amenity spaces, etc. Industry standards and guidance provide further detail regarding green roof specification and design for specific circumstances. The Green Roof Organisation (GRO) and Construction Industry Research and Information Association (CIRIA) are some organisations that provide specific guidance for green roof design and construction. It is not considered that the Plan needs to align policy with Dublin Fire Officer requirements as fire certs are issued under a separate code.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
iv) Submission suggests wording under the heading 'Hardstanding/Parking Areas' in Section 7.1.3 "All Other Developments" is ambiguous. Recommend that alternative wording to provide for situations where infiltration to ground is not feasible as follows: <i>"All proposed parking and hardstanding areas should not be discharged to the public sewer where ground infiltration conditions are suitable but should be infiltrated locally, via a specifically designed permeable paving/porous asphalt system, in accordance with the requirements of Section 12.4.8 of the County Development Plan 2022-2028".</i>	<b>B1072</b>		<p>The Executive notes the suggested alternative wording and recommends an update to Appendix 7.1. to address the issue</p> <p><b>Recommendation</b> Update Appendix 7.1 Stormwater Management Policy, Section All Other Developments From <i>"Hardstanding/Parking Areas</i> <i>All proposed parking and hardstanding areas should not be discharged to the public sewer but must be infiltrated locally, via a specifically designed permeable paving/porous asphalt system, in accordance with the requirements of Section 12.4.8.3 Driveways/Hardstanding Areas of the DL RCC County Development Plan 2022-2028."</i> To <i>"Hardstanding/Parking Areas</i> <i>All proposed parking and hardstanding areas should <del>not be discharged to the public sewer but must be infiltrated locally</del> maximise local infiltration before discharge to the surface water drainage system, via a specifically designed permeable paving/porous asphalt system, in</i></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<i>accordance with the requirements of Section 12.4.8.3 Driveways/Hardstanding Areas of the DLRCC County Development Plan 2022-2028.”</i>



### 3.22: Appendix 8 - Interim Dún Laoghaire Urban Framework Plan

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<b>3.22.1: Appraisal</b>			
<p>i) Submission considers that the appraisal section is less than satisfactory and poses a series of questions relating to progress on improved pedestrian access routes between 'George's Street' and the sea front. Submitter is not aware that improved access has been provided between 'Cualanor' and the seafront.</p>	<b><u>B1182</u></b>	3	<p>The Executive notes the issue raised and would not concur that the progress made since 2016 has been less than satisfactory in the town of Dún Laoghaire.</p> <p>Table 1 of Appendix 8 sets out what has been delivered since 2016. In relation to the improved access that has been provided at Cualanor and Honey Park, this is a reference to the well-used permeability links that exist between these new communities and the town as opposed to links to the seafront. In relation to progress on improved pedestrian access routes between George's Street and the sea front, work is ongoing on a shared living scheme at 'Eblana', which will provide a new access through linking the town to the Seafront. The library also provides a new link as does the link from 'George's Street' to 'George's Place'.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission considers that the Plan should contain the following:</p> <ul style="list-style-type: none"> <li>● A quantitative and qualitative assessment of achievements and shortcomings of the previous plan.</li> <li>● A clear set of short-, medium- and longer-term objectives.</li> <li>● A clear prioritisation among the different projects in each of the above categories.</li> <li>● An indication of the potential requirements and potential availability of funding.</li> <li>● A proposed mechanism for tracking progress on the implementation.</li> </ul>	<b><u>B1182</u></b>	3	<p>The Executive notes the requests made and considers that the Plan already contains a qualitative assessment of achievements and shortcomings of the previous plan as set out in Table 1, which is entitled "Progress in UFP since 2016". It is unclear what kind of quantitative assessment is requested.</p> <p>Section 8.8 of Appendix 8 of the Draft Plan sets out objectives. It is not considered advantageous to differentiate between which objectives are short, medium, or long term as they all pertain to future development of the town. They may all be subject to future and differing funding sources and/or they may be also delivered by private sector or public sector. This means that some objectives may be achieved quicker than others.</p> <p>The Dún Laoghaire Urban Framework Plan (DLUFP) has been in place since 2004 and experience in its implementation has shown the importance of a strong vision underpinned by objectives and policies, as the delivery of this vision will only be achieved over successive County Development Plan cycles.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>In relation to funding, it is respectfully considered that the County Development Plan is not the location to set out funding requirements. Monitoring of the Plan, as set out in Chapter 15 of the Draft Plan will aid in tracking implementation.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<b>3.22.2: Opportunities and Challenges</b>			
<b>3.22.2.1: General</b>			
<p>i) Submission states that Dún Laoghaire could be developed as a model sustainable town. This could involve re-use of old-buildings over building new build, encouraging walkability by incentivising parking in existing car parks surrounding the town (harbour; library etc); provision of frequent electric eco shuttle-buses to move in a loop in and around the town, etc...</p>	<b>B0905</b>	3	<p>The Executive notes and welcomes the issues raised.</p> <p>The Draft Plan includes a range of Policy Objectives to promote sustainability across the County, including in Dún Laoghaire. The Draft Plan incorporates a new Chapter entitled 'Climate Action', (Chapter 3), which sets out Policy Objectives with regard to, <i>inter alia</i>, energy efficiency in buildings, construction materials, renewable energy, district heating, decarbonising motorised transport and urban greening.</p> <p>In addition, it is a Policy Objective of the County Development Plan to implement the 'Dún Laoghaire-Rathdown Climate Change Actions Plan' (Policy Objective CA4).</p> <p>With regard to older buildings, the Draft Plan expresses a clear preference for the repair, retrofitting and reuse of existing buildings over demolition and new construction. In this regard, Policy Objective CA6: <i>Retrofit and Reuse of Buildings</i> of the Draft Plan states: "It is a Policy Objective to require the retrofitting and reuse of existing buildings rather than their demolition and reconstruction where possible recognising the embodied energy in existing buildings and thereby reducing the overall embodied energy in construction as set out in the Urban Design Manual (Department of Environment Heritage and Local Government, 2009). (Consistent with RPO 7.40 and 7.41 of the RSES)".</p> <p>Section 11.4.2 'Architectural Conservation Areas', Section 11.4.3 'Protection of Other Elements of Built Heritage', Section 12.2.1 'Built Environment' and Policy Objective PHP19: <i>Existing Housing Stock – Adaptation</i>, also support this approach.</p> <p>The DLUFP also contains a focus on "Promoting sustainability initiatives that are low energy, climate resilient exemplars in the transition to a low carbon economy."</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>The Council are currently progressing development of decarbonisation zones within the County as per government guidance, Dún Laoghaire town is being considered as one such location.</p> <p><b>The incentivisation of car parking and the provision of a shuttle service are operational matters and not County Development Plan issues.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission states that the strategic focus should be on the development of Dún Laoghaire harbour into a distinctive district for Dún Laoghaire maximising the use of existing and future public transport options available to the harbour to promote sustainability.</p>	<p><b><u>B0989</u></b></p>		<p>The Executive notes and concurs with the issue raised.</p> <p>It is considered that the DLUFP already places a focus on the development of the harbour. Section 8.3 of the DLUFP states that, <i>“The Harbour offers unparalleled opportunities as it repositions itself from its previous role as a commercial port to a marine, leisure, tourism, heritage and innovation destination that is fully integrated with the wider Town”</i>.</p> <p>Various sections of the DLUFP address this focus including, Section 8.5.1 ‘The Waterfront and St Michaels Wharf’, Section 8.6.7 ‘The Waterfront’, Section 8.6.8 ‘Central Harbour Area’, Section 8.6.9 ‘Carlisle Pier’ and Section 8.6.10 ‘The Gut/West Pier’. A study has been commissioned to make recommendations as to the future of the harbour and its integration with the town. <b>Recommendations</b> can be considered for inclusion in the future LAP.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submission suggests that Dún Laoghaire needs a Town Architect, which is an approach that has been successful elsewhere.</p>	<p><b><u>B0905</u></b></p>	<p>3</p>	<p>The Executive notes the issues raised. <b>Staffing in an operational issue and not a County Development Plan issue.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Submission states that the expansion of Dún Laoghaire Town Centre towards Monkstown should</p>	<p><b><u>B0013</u></b></p>	<p>3</p>	<p>The Executive notes the issue raised.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>be limited. It is important to punctuate space between the Town Centre and Monkstown Village.</p>			<p>Dún Laoghaire is a Major Town Centre and, as such carries the corresponding 'MTC' land use zoning objective. Monkstown, meanwhile, is designated 'NC' – Neighbourhood Centre zoning, while the area in between the two settlements is primarily zoned for residential purposes or for open space. The purpose of the zoning objectives is to manage the type(s) of development that are generally permissible and to punctuate spaces between the settlements. It is considered that the zoning designations in the area achieves this, and it is not proposed to expand the Dún Laoghaire 'MTC' land use zoning in the Draft Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>v) Submission notes that the town centre should be the vibrant beating heart of our County with national and international recognition. Main street and its environs are generally in a very dilapidated state; derelict buildings, empty commercial premises, general lack of specialist retailers (fish shop, delicatessen, wine shop, boutiques, etc.), ill-maintained and littered laneways and streets, fast food outlets, lack of outdoor seating and landscaping when compared to our neighbouring towns, etc.</p>	<p><b>B1182</b></p>	<p>3</p>	<p>The Executive notes the issue raised and would not concur with all items raised.</p> <p>While it is acknowledged that there are empty commercial units and closures in the town, there are also new commercial developments which have opened. The comments/issues in the submission are being addressed by investments such as the recent public realm improvements. Development that has taken place since 2016, include new housing at Georges Place and changes to the residential offerings on both George's Street and surrounding streets.</p> <p>A study has been commissioned to make recommendations as to the future use and economic development of the town, including measures that could be taken to leverage off the opportunities created by the harbour and its better integration into the town centre. <b>While many of the issues raised are operational issues and not County Development Plan issues</b>, it is also noted that the Dún Laoghaire-Rathdown Local Enterprise Office provides a range of supports for both start up and existing businesses. Considerable investment has been made in public realm improvements on George's Street including provision of seating and landscaping and work has recently commenced on the 'Myrtle Square Project'.</p> <p>A study has also been commissioned to make recommendations as to the future of the harbour and its integration with the town. <b>Recommendations</b> can be considered for inclusion in the future LAP.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<b>3.22.2.2: Education</b>			
i) Submission state that Dún Laoghaire's role as an educational centre should be expanded (IADT, language schools, Digital Marketing Institute but also primary and secondary schools). The IADT should be better linked to the town centre and should be encouraged to expand some student locations to the Town Centre.	<u><b>B0036</b></u> <u><b>B0077</b></u> <u><b>B0876</b></u>	3	The Executive notes the issue raised and concurs with the sentiments. The Council works actively with IADT and should IADT or other educational providers seek to move/expand into the town centre area, this would be welcomed and supported. It is noted that 'education' uses are 'permitted in principle' on 'MTC' zoned lands. There is a current live planning application for a primary school on lands at George's Place.  <b>Recommendation</b> No change to Draft Plan.
<b>3.22.2.3: Rates &amp; Tax</b>			
i) Various issues were raised in submissions with regard to commercial rates as follows: <ul style="list-style-type: none"> <li>• Cut rates to zero (or as low as possible) for businesses and particularly start-ups/offer rates holidays for new businesses.</li> <li>• The problem of vacancies in commercial properties can continue to be addressed by the retention of commercial rates, which should be increased to 75%.</li> <li>• Rates are too high within the County. More support should be given to traders, preferably a return on their rates by drastically increasing street cleaning.</li> </ul>	<u><b>B0036</b></u> <u><b>B0077</b></u> <u><b>B0540</b></u> <u><b>B0905</b></u>	3	The Executive notes the issue raised.  <b>Commercial rates are an operational matter and do not fall within the remit of the County Development Plan.</b>  <b>Recommendation</b> No change to Draft Plan.
ii) Submission proposes the introduction of a site value tax for property in Dún Laoghaire.	<u><b>B0036</b></u>	3	The Executive notes the issue raised.  <b>Property tax/site value tax are operational matters and do not fall within the remit of the County Development Plan.</b>  <b>Recommendation</b> No change to Draft Plan.
iii) Submissions suggest that living over the shop be tax efficient by offering tax incentives to renovated properties.	<u><b>B0036</b></u> <u><b>B0141</b></u>	3	The Executive notes the issue raised.  <b>Tax incentives do not fall under the remit of the County Development Plan.</b>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>However, 'living over the shop' has been dealt with in Section 4.3 of the Draft Plan, which states:  <i>"Support 'Living-Over-the-Shop' schemes. Encourage residential use of the upper floors of existing commercial properties in retail/commercial areas including in the environs of Dún Laoghaire, Glasthule, Dalkey, Sandycove, Blackrock, Monkstown and Dundrum".</i></p> <p>It is further noted that Section 12.3.8.9 'Living-Over-The-Shop' of the Draft Plan provides several derogations to support this type of development in respect of private open space, parking, and unit size standards.</p> <p><b>Recommendation</b>            No change to Draft Plan.</p>
<b>3.22.2.4: Transport and Movement</b>			
i) Submission suggests that the Council recirculate traffic away from the centre of the town.	<b><u>B0036</u></b>	3	<p>The Executive notes the issue raised.</p> <p><b>This is an operational matter and not a County Development Plan issue.</b></p> <p>It is noted that there is a trial pedestrianisation of Georges Street for the Summer 2021.</p> <p><b>Recommendation</b>            No change to Draft Plan.</p>
ii) With regard to car parking the submission raise the following: <ul style="list-style-type: none"> <li>• Concern that there is insufficient quantum of car parking in the town centre.</li> <li>• Car parking within the town centre detracts from the town and its retail environment. On street parking charges have become a source of income for the Council and that the town suffers as a result.</li> <li>• Need to develop IT systems to improve the parking situation/security, infrastructural services, and measure pollution.</li> </ul>	<b><u>B0077</u></b> <b><u>B0905</u></b>	3	<p>The Executive notes the issue raised.</p> <p>The provision and management of on street car parking along with setting of fees, and car parking access issues, in terms of <b>how they relate to public roads are generally operational issues and not County Development Plan issues</b>. The more strategic issues may be considered in the forthcoming Dún Laoghaire and Environs Local Area Plan.</p> <p><b>Recommendation</b>            No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> <li>• Good car access and legible paths to parking provision is fundamental to the town's function as a Major Town Centre.</li> <li>• Need to promote drivers to use the car parks surrounding the town centre, at the harbour as well as privately owned locations such as Bloomfield. Visitors should be encouraged to enjoy the town centre on foot.</li> </ul>			
<p>iii) Submission states that the temporary measures of one-way traffic systems &amp; wide cycle ways on the coastal routes will need to be reversed once the traffic volumes increase post Covid.</p>	<b><u>B0077</u></b>	3	<p>The Executive notes the issue raised.</p> <p><b>This is an operational matter and not a County Development Plan issue.</b> The Council is reviewing the Coastal Mobility Route (CMR) with input from an independent assessment of the route.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Submission states that while public transport is vital, consider moving some public transport services out of Georges St. to make the town centre more pedestrian friendly.</p>	<b><u>B0905</u></b>	3	<p>The Executive notes and agrees with the issue raised.</p> <p>The Council is working on an ongoing basis to make Dún Laoghaire more friendly towards cyclists and pedestrians while facilitating other transport modes. While the Council does discuss these issues with the NTA, the Council is not a transport provider, and the provision and routing of bus services is a matter for the NTA.</p> <p>It should be noted that as part of trial pedestrianisation of the George's Street Lower and parts of Sussex Street and Convent Road this summer, that the 46A and 75 Bus routes have been diverted away from the Main Street with new stops being provided on Crofton Road near Charlemont Terrace and on Clarence Street near its junction with York Road.</p> <p>The Council is also working with the NTA on the public transport interchange at Dún Laoghaire as part of the Bus Connects project.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<b>3.22.2.5: Business &amp; Economy</b>			
i) Submissions notes: <ul style="list-style-type: none"> <li>• Larger retail and office units should be developed to satisfy the demand from multinational retailers and commercial businesses.</li> <li>• There is a decline in the town centre commercially.</li> </ul>	<u><b>B0077</b></u> <u><b>B0730</b></u>	3	<p>The Executive notes the issue raised.</p> <p>Dún Laoghaire is designated as a Major Town Centre and benefits from 'MTC' land use zoning objective. As such, a wide variety of commercial unit types would be 'permitted in principle'. However, it falls to landowners/developers to bring proposals forward to meet market demand. These proposals would then be assessed through the development management process.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
ii) Submission suggests that the Council develop a "night-time economy" with outdoor facilities & improved lighting on the streets.	<u><b>B0077</b></u>	3	<p>The Executive notes the issue raised.</p> <p>This has been dealt with in Section 12.6 'Towns and Villages and Retail Development' of the Draft Plan, which provides, <i>inter alia</i>, guidance on larger scale development in centres, which seeks features that improve the overall attractiveness of schemes to the public, for example:</p> <ul style="list-style-type: none"> <li>• Activities and uses including retail services and restaurant uses that keep the centre alive both during the day and evening, and</li> <li>• The inclusion of some element of residential uses, particularly apartments, as an integral part of the centre in order to generate evening activity and security.</li> </ul> <p>In addition to the above, Section 7.5.2 Major Town Centres of the Draft Plan states that the following are considered suitable for the Old Town Quarter in Dún Laoghaire:</p> <ul style="list-style-type: none"> <li>• Specialist home stores/crafts, young trend clothing/footwear brands, culture/galleries/gifts, music/books, restaurants/world cuisine and evening culture.</li> </ul> <p>It is also noted that a variety of entertainment/evening/night time uses are 'permitted in principle' under the 'MTC' land use zoning objective, pertaining to Dún Laoghaire.</p> <p>Section 5.7 'Road and Street Network' of the Draft Plan provides the following Policy Objective regarding street lighting:</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<ul style="list-style-type: none"> <li>“5.7.8 Policy Objective T29: Street Lighting - It is a Policy Objective to provide and maintain street lighting on the public road/footway/cycleways throughout the County in accordance with commonly accepted best practice, the Council's public lighting masterplan and the upgrade of sodium lights to LEDs”.</li> </ul> <p>In addition, the DLUFP includes a focus on “creation of the 18 hour economy” (Section 8.6) and also provides a variety of references to improved public lighting across several quarters (in conjunction with additional measures e.g. planting and street furniture) in order to improve the public realm. The following objective under Section 8.8 (Appendix 8) supports the references for various quarters and states as follows:</p> <ul style="list-style-type: none"> <li>“Improve and enhance existing visual amenity and streetscape including lighting within the Interim Framework Plan area”.</li> </ul> <p>It is, therefore, considered that the issue raised has been adequately addressed in the Draft Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
iii) Submissions suggest that the Council facilitate additional outdoor dining and remove red tape.	<b><u>B0077</u></b> <b><u>B0283</u></b>	3	<p>The Executive notes the issue raised. <b>This is not a County Development Plan issue.</b></p> <p>Section 254 of the Planning and Development Act 2000, (as amended) allows local authorities to licence outdoor dining. Where licenced, this form of development is treated as ‘exempted development’. A range of initiatives have been introduced by various Government departments to facilitate and to fund outdoor dining as a part of the Covid-19 response measures. These measures, which include funding for both businesses and for local authorities have resulted in an allocation of €520,000, following applications from Dún Laoghaire-Rathdown to the National Transport Authority. As these measures are undertaken under existing legislation, it is not considered that additional policy measures are required in the Draft Plan.</p> <p>There is nothing in the Draft Plan that constrains use of the public realm for this purpose should such uses be successful.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Submission suggests that more emphasis could be put on tourism with a focus on heritage and facilities such as the sea and the hills.</p>	<p><u><b>B0905</b></u></p>	<p>3</p>	<p>The Executive notes the issue raised. The 'Dún Laoghaire-Rathdown Tourism Strategy Marketing Plan 2017–2022' is the Council's detailed strategy for the development of the County's tourism product, setting out a clear vision and key objectives to drive tourism development. The promotion of the County's heritage assets, as well as natural assets, are a key feature of the Strategy.</p> <p>The Draft Plan facilitates and promotes the implementation of the Tourism Strategy Marketing Plan under Section 6.4.2.15, which states: <i>"Policy Objective E16: Tourism and Recreation: It is a Policy Objective to co-operate with the appropriate agencies in promoting sustainable tourism and securing the development of tourist and recreation orientated facilities in the County. Furthermore, the Council will promote the implementation of the Dún Laoghaire-Rathdown Tourism Strategy &amp; Marketing Plan 2017-2022 and any subsequent update thereof"</i>.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>v) Submissions suggest Dún Laoghaire Shopping Centre is in need of major redevelopment.</p>	<p><u><b>B0077</b></u> <u><b>B0905</b></u> <u><b>B1182</b></u></p>	<p>3</p>	<p>The Executive notes the issue raised. Any redevelopment of the Shopping Centre would be required to accord with the policies and objectives of the Draft Plan and the Urban Framework Plan (UFP), which incorporates many objectives aimed at upgrading and improving the public realm environment.</p> <p>It is considered that the existing promotional narrative in the UFP is the appropriate approach to support the re-development of what is acknowledged to be, a pivotal site in the centre of the Town.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>vi) Submission states that there should be incentives and sanctions to improve shop facades.</p>	<p><u><b>B1182</b></u></p>	<p>3</p>	<p>The Executive notes the issue raised. <b>These are operational matters and are not County Development Plan issues.</b></p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
No change to Draft Plan.			
<b>3.22.2.6: Vacant properties</b>			
i) Submissions states that owners of derelict stores need to be encouraged to develop prominent and valuable sites, which give a depressed look to the Main Street.	<u><b>B0036</b></u> <u><b>B0077</b></u> <u><b>B0540</b></u> <u><b>B0905</b></u>	3	<p>The Executive notes the issue raised. The issue of vacancy is addressed in Section 2.6.2.2, of the Draft Plan, which includes Policy Objective CS14 - Vacancy and Regeneration which states, <i>"It is a Policy Objective to address issues of vacancy and underutilisation of lands within the County and to encourage and facilitate the re-use and regeneration of vacant sites subject to the infrastructural carrying capacities of any area"</i>.</p> <p>It is noted that whilst there are no 'derelict' sites as defined by the legislation in Dún Laoghaire Town, there are several long-term vacant units that detract from the streetscape, regardless of their condition. Since they are not derelict sites under the terms of the Planning and Development Act, 2000 (as amended) there is no legislation which empowers the Council to take action in these cases. The Council do, however, offer a generous 'Shopfront Improvement Grant' and a grant for occupying vacant premises.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.22.2.7: Arts Strategy</b>			
i) Submissions consider turning Dún Laoghaire into an artistic and creative centre to aid urban regeneration. An arts strategy could be the foundation of the urban regeneration of Dún Laoghaire.	<u><b>B0036</b></u> <u><b>B0876</b></u> <u><b>B0855</b></u>	3	<p>The Executive notes the issue raised.</p> <p>Dún Laoghaire-Rathdown has an 'Arts Development Plan 2016-2022', the 'DLR Cultural and Creativity Strategy 2018-2022', a 'Public Art Policy 2018-2025' and the Arts Office within the Council who engages with and works with local artists. These are the appropriate documents/avenues through which to develop the arts in Dún Laoghaire. Section 4.2.1.9 of the Draft Plan states as follows in this regard:  <i>"Policy Objective PHP10: Music, Arts and Cultural Facilities</i>  <i>It is a Policy Objective to:</i></p> <ul style="list-style-type: none"> <li>• <i>Facilitate the continued development of arts and cultural facilities throughout Dún Laoghaire-Rathdown in accordance with the County Arts Development Plan 2016-2022 and any subsequent County Arts Development Policy.</i></li> <li>• <i>Facilitate the implementation of the DLR Cultural and Creativity Strategy 2018-2022"</i>.</li> </ul>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>It is noted that cultural uses are 'permitted in principle' within Major Town Centre zoning, which pertains to Dún Laoghaire. It is also noted that Dún Laoghaire is relatively well served with regard to cultural uses and that there is a need to ensure a balanced approach across the County.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission considers that the opportunity presented by Dún Laoghaire Harbour and the attraction of the creative class to Dún Laoghaire to establish a vibrant creative community has been missed. There may be more opportunities at the Old Fire Station, The Harbour and IADT, which need to be investigated and explored.</p>	<b><u>B0876</u></b>	3	<p>The Executive notes the issue raised. There is a current planning application at the Old Fire Station for a new primary school, and the Draft Plan carries the objective 'ED' – 'Proposed Education Site', which reflects the need for additional school places in the Dún Laoghaire area.</p> <p>Cultural uses would generally be supported at the harbour or at IADT given the relevant zonings, should a planning permission be sought at these locations, subject to the normal development management process.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submission includes two proposals made in relation to arts infrastructure in the area, one a proposal entitled the Bath House Arts Centre and the other a proposal regarding a creative hub at the Carnegie library building.</p>	<b><u>B0876</u></b> <b><u>B0855</u></b>	3	<p>The Executive notes the issue raised. <b>The issues raised are not County Development Plan issues.</b> The submission includes two proposals for cultural uses, however, it is understood that these proposals have yet to secure funding. Should an application be brought forward at either of the named locations, they would be assessed through the normal development management process, or through a Part 8 process, depending on the applicant.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Submission suggests that simple solutions such as a buskers corner could be explored. Street art should be encouraged/funded in laneways.</p>	<b><u>B1182</u></b>	3	<p>The Executive notes the issues raised.</p> <p><b>These are operational issues and are not County Development Plan issues.</b></p> <p>It is, however, noted that there is an ongoing project - the Dún Laoghaire Street Art Project, which aims to create a collection of street art pieces in Dún Laoghaire, forming an open-air gallery in the town.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>v) Submission states that Policy Objective T32 requiring improved access to the port should be omitted as the Ferry has stopped and instead a policy statement for Dún Laoghaire Harbour should be substituted as follows: A major public arts initiative for Dún Laoghaire harbour should be promoted as a means of sustaining resilience and creativity, urban regeneration and integrating the harbour with the town centre.</p>	<b><u>B0876</u></b>	3	<p>No change to Draft Plan.</p> <p>The Executive notes the issue raised but does not agree that Policy Objective T32: 'Access and Ports', should be removed.</p> <p>The National Port Policy 2013 recognises Dún Laoghaire as a marine related asset and the EMRA RSES recognises Dún Laoghaire as a port of Regional significance and as an economic driver to the Region. The Plan must be consistent with the EMRA RSES and have regard to National policy. It is, therefore, appropriate for Policy Objective T32: 'Access and Ports' to support improved access to the port for all modes. This is subject to the requirement (pg. 115) <i>"to take full cognisance of the need to protect and preserve the historic streetscapes, vistas and built heritage of Dún Laoghaire and the quality of life of local residential communities adjacent to the Port"</i>.</p> <p>Notwithstanding this, the Executive recognises the future development of the harbour offers opportunities as it repositions itself from its previous role as a commercial port to a marine, leisure, tourism, heritage, and enterprise destination. A study (Economic Plan for Dún Laoghaire Harbour) has been commissioned to make recommendations as to the future use and redevelopment of the harbour and its integration with the town along with a second study Spatial and Economic Plan for Dún Laoghaire Town. <b>Recommendations</b> can be considered for inclusion in the future Dún Laoghaire and Environs LAP.</p> <p><b>Recommendation</b> No change to the Draft</p>
<b>3.22.2.8: Markets</b>			
<p>i) Submissions suggest:</p> <ul style="list-style-type: none"> <li>• People's Park Market should revert to a "Farmers Market" so as not to be in direct competition with the rate paying businesses in the Town.</li> <li>• Less food retailers in the CoCo markets, more arts, and crafts. Maybe offering wooden cabins which are better for bad weather.</li> </ul>	<b><u>B0077</u></b> <b><u>B0905</u></b> <b><u>B1182</u></b>	3	<p>The Executive notes the issue raised.</p> <p><b>The detailed arrangements for the operation of Council-run markets are an operational matter and is not a County Development Plan issue.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> <li>An imaginative solution could easily be found to locate the Sunday market in Georges Street and its environs.</li> </ul>			
<b>3.22.2.9: Residential Development</b>			
<p>i) Submissions suggest that the Council should be proactive in increasing the residential offering in the town, particularly the promotion of "living over retail" development.</p>	<p><b><u>B0077</u></b> <b><u>B0283</u></b></p>	<p>3</p>	<p>The Executive notes the issue raised. One of the areas of progress since 2016 has been the evolving nature of the residential offering in the town. With regard to living over the shop Section 4.3.1 of the Draft Plan <i>'Delivering and Improving Homes'</i>, states that the Council will: <i>"Support 'Living-Over-the-Shop' schemes. Encourage residential use of the upper floors of existing commercial properties in retail/commercial areas including in the environs of Dún Laoghaire, Glasthule, Dalkey, Sandycove, Blackrock, Monkstown and Dundrum"</i>.</p> <p>In addition, Section 12.3.8.9 of the Draft Plan, <i>'Living-Over-The-Shop'</i> provides several derogations to support this type of development in respect of private open space, parking, and unit size standards.</p> <p>Section 4.3 of the Draft Plan also provides policy support for the appropriate change of use from commercial to residential, stating as follows: <i>"Support appropriate change of use of vacant commercial space into residential use in appropriate locations and having regard to the zoning objective of the area"</i>.</p> <p>The effect of similar provisions in the current 2016 Plan are already in evidence in Dún Laoghaire where several former commercial premises having been converted to residential use, for example, on George's Street Lower. It is, therefore, considered that this issue has been adequately addressed in the Draft Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission suggests:</p> <ul style="list-style-type: none"> <li>The MTC area of Dún Laoghaire should have a strategy for mixed use as there is too much retail.</li> <li>From Bloomfield's to Cumberland St and the Post office to the People's park should be designated residential.</li> </ul>	<p><b><u>B1096</u></b></p>	<p>3</p>	<p>The Executive notes the issue raised.</p> <p>Dún Laoghaire is zoned Major Town Centre – 'MTC'. 'MTC' zoning facilitates a wide range of uses, including residential uses which are 'permitted in principle'. While residential uses are supported in 'MTC' areas, it is important to achieve a balance of uses between residential, community infrastructure and commercial, which drives the local economy and provides employment. The two ongoing studies relating to the harbour and the town will inform the</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>future Dún Laoghaire and Environs LAP. These may result in the LAP providing new policies regarding use and mix in the 'MTC' and 'W' zoning. It is considered that the Urban Framework Plan should be updated in this regard.</p> <p><b>Recommendation</b>            Insert a new sentence in Section 8.1 (pg. 265) after the follow:  <i>"This Framework Plan is entitled an Interim Plan and will be reviewed following on from the outcomes of the two ongoing studies of the Harbour and the town"...</i></p> <p><i>"The outcomes of the two studies will also inform the future Local Area Plan."</i></p> <p>Insert a new sentence at the end of Section 8.3 (pg. 267) as follows:  <i>"The future Local Area Plan may contain specific policies on appropriate mix of uses informed by the two studies".</i></p>
<b>3.22.2.10: Conservation and Heritage</b>			
<p>i) Submissions state that Plans should be made to encourage higher density house development close to Dún Laoghaire town to rejuvenate the area, too many nearby architectural conservation areas are damaging the town centre.</p> <p>While the town's conservation and heritage are very important, it should not be used as a reason to oppose viable developments.</p>	<p><b>B0077</b> <b>B0122</b></p>	<p>3</p>	<p>The Executive notes the issues raised but would not concur that the unique architectural heritage of the town, which includes Protected Structures and ACAs necessarily preclude high density development. Policies in the Draft Plan support sensitive development, which addresses any negative impact on the streetscape or individual structures.</p> <p><b>Recommendation</b>            No change to Draft Plan.</p>
<p>ii) Submission states that Dún Laoghaire was originally built to the highest standards of its day but now largely features charity and pound shops and fast food outlets. There appears to be no long-term vision for the area or to preserve, promote and enhance Dún Laoghaire as a tourist living heritage town.</p>	<p><b>B0141</b></p>	<p>3</p>	<p>The Executive notes the issue raised.</p> <p>While the points raised in the submission are noted, it is considered that a major town centre has the ability to accommodate a broad range of businesses, including a wide variety of retail. As the retail market changes and as the residential and employment population in DLR increases, it is likely that the market will respond, and the offer will evolve. Charity and vintage shops have a role to play in the recycling and 'upcycling' of previously owned goods, which increases the lifetime of a product and reduces the requirement to expend valuable resources on the manufacture of new items. The reuse of a product and the extension of its</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>useful life helps the County to achieve its sustainability goals and is an important element of the Circular Economy approach promoted and supported in Chapter 10 of the Draft Plan.</p> <p>Two studies are currently underway that will inform the policies and objectives for the future Dún Laoghaire and Environs LAP and identify opportunities to enhance the vitality and viability of the town.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submission states that new infill/replacement buildings are being permitted that have no harmony or respect for the adjoining Victorian buildings.</p>	<b>B0141</b>	3	<p>The Executive notes the issue raised.</p> <p>New infill/replacement buildings are assessed on an individual basis through the development management process. Where located in an ACA or adjacent to a Protected Structure, development is required to be carefully considered and to integrate effectively with existing buildings, while allowing for the provision of high-quality architecture.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Submission states that within Dún Laoghaire - the majority of the Victorian architecture is held in private ownership. No public assistance is available and parking restrictions can make renovations difficult. Request that parking restrictions relaxed to allow for skips etc. without charge.</p>	<b>B0905</b>	3	<p>The Executive notes the issue raised.</p> <p><b>This is not a County Development Plan issue.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>v) Submission notes that a proposal for the restoration of the historic 'Dunleary' lifeboat, which was built in 1919 and served Dún Laoghaire until 1938. The proposal sets out the history of the lifeboat, works to date, and future proposals for restoration (including estimated costings) and operation, initially for static public display and subsequently as a seagoing vessel.</p>	<b>B1065</b>	3	<p>The Executive notes the issue raised.</p> <p><b>This is not a County Development Plan issue.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<b>3.22.2.11: Mix of Uses</b>			
<p>i) Submissions state that there should be a mixture of residential and retail in the town centre/on George's St., bringing life and variety to the area including in the evening time.</p>	<p><b><u>B0283</u></b> <b><u>B0540</u></b></p>	<p>3</p>	<p>The Executive notes and agrees with the issue.</p> <p>This issue is addressed in Section 7.5.2.1 of the Draft Plan, Policy Objective RET4: Major Town Centres, which states as follows:</p> <p><i>"It is a Policy Objective of the Council to maintain the two Major Town Centres – Dún Laoghaire and Dundrum – as the primary retail centres in the County and to support their evolving multifunctional role. The vitality of the towns will be enhanced by their mixed-use nature. In addition to retail, these centres must include community, cultural, civic, leisure, restaurants, bars and cafes, entertainment, employment and residential uses. Development shall be designed so as to enhance the creation of a sense of place".</i></p> <p>In addition to providing support for a diverse range of uses within the County's Major Town Centres, the Draft Plan also provides specific support for the conversion of vacant commercial premises to residential uses (Section 4.3.1.2 Policy Objective PHP19: Existing Housing Stock - Adaptation), where this do not negatively affect the appropriate balance and functioning (in isolation or in tandem with other development) of the commercial role of the centre. The 'pepper-potting' of residential uses along a high street is undesirable as it can reduce the commercial/retail attraction of the street. Instead, conversions to residential uses from commercial should be grouped together and should generally be in more peripheral locations e.g. George's Street Lower.</p> <p>Two studies are currently underway that will inform the policies and objectives for the future Dún Laoghaire and Environs LAP and identify opportunities to enhance the vitality and viability of the town.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission states that the retail environment is changing due to online shopping and so adjustments should be made to the mix of retail/residential uses.</p>	<p><b><u>B0036</u></b></p>	<p>3</p>	<p>The Executive notes the issue raised.</p> <p>This issue is addressed in Section 7.6.1.1 of the Draft Plan, Policy Objective RET8: Assessment of Retail Proposals and in Section 12.6.1 of the Draft Plan, 'Assessment of Development Proposals in Towns, District and Neighbourhood Centres', which allow for the provision of a</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>retail impact assessment where appropriate. This issue is also addressed under Section 7.2.2 of the Draft Plan, 'Recent Trends Towards Multifunctional Centres', which addresses the changing nature of retail.</p> <p>The role and importance of employment other than retail also needs to be provided for.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submission supports the Draft Dún Laoghaire Interim Urban Framework Plan's objectives for placemaking and creating vitality including the distinct 'Quarters' approach. Submission suggests that each quarter could contain a coworking space.</p>	<b>B0430</b>	3	<p>The Executive notes the issue raised.</p> <p>The Eastern &amp; Midlands Regional Authority (EMRA) recently undertook an assessment on coworking entitled '<i>Regional Co-working Analysis</i>', in conjunction with Ireland's two other Regional Assemblies. The analysis acknowledges the profound impact that the Covid-19 pandemic has had on working patterns, with remote working becoming a normal part of work practices across many industries. The report also acknowledges that this change has the potential to open up an array of economic and environmental opportunities for all of our regions. The Draft Plan, in recognition of changing workplace practices, states that the Council will support proposals for office accommodation in accordance with the standards contained therein (See also Section 3.6 of the Draft Pan, 'Enterprise and Employment' for new recommended Policy Objective in relation to co-working)</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Submission states, "Significant evolution in terms of the residential offer in Dún Laoghaire". Are any statistics available on this?</p>	<b>B1182</b>	3	<p>The Executive notes the issue raised.</p> <p>Residential development in recent years has ranged from individual retail/commercial units that have been converted to residential, to larger scale residential schemes, such as the Pavilion Apartments development on Marine Road. A review of the most recent CSO census statistics indicates that the townland of 'Dunleary' has seen an increase in its resident population from 7,037 persons in 2011 to 7,731 in 2016, which are the latest census figures available. This increase of c. 700, or 10% over a five-year period, represents a significant level of population growth in the town. It is acknowledged that these statistics relate to 2016 and that additional development has been permitted and constructed since then. Census 2022 will provide valuable updates in this regard.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.22.2.12: Miscellaneous</b>			
<p>i) Submission considers that the entrances to the town are anonymous – most if not all of our neighbouring towns have “Welcome to xxx signs”.</p>	<b><u>B1182</u></b>	3	<p>The Executive notes the issue raised.</p> <p><b>The issues raised are operational in nature and not County Development Plan issues.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission suggests the relocation of the HSE Methadone Clinic – Patrick Street location in a Town Centre, beside a primary school, is unsuitable and hurts the perception of the Town.</p>	<b><u>B0077</u></b>	3	<p>The Executive notes the issue raised.</p> <p>Applications for healthcare facilities including clinics are dealt with via the development management process. The location (or relocation) of the methadone clinic or other healthcare facilities are the responsibility of the HSE.</p> <p><b>The issues raised are not County Development Plan issues.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submission expresses concerns with recent applications in Dún Laoghaire, specifically 12-13 storey development, it agrees with the reference to church spires being points of reference.</p>	<b><u>B1035</u></b>	3	<p>The Executive notes the issue raised.</p> <p>As noted in the submission, the Draft Plan (Appendix 5: <i>Building Height Strategy</i>) acknowledges the importance of St. Michael's and Mariners Church spires as important focal points both in the town and when viewed from the piers and Dublin Bay. It is an objective of the Urban Structure Plan (Appendix 8) that this hierarchical relationship between long established landmark buildings and new infill development be preserved and maintained.</p> <p>Recent development approvals are a matter for the development management process, which are determined by the Council, by An Bord Pleanála on appeal, or by An Bord Pleanála through the SHD process. Dún Laoghaire-Rathdown County Council will continue to make decisions and/or provide advice to An Bord Pleanála in line with its adopted County Development Plan. However, it is worth noting that with the adoption of the Section 28 '<i>Urban Development and Building Heights Guidelines for Planning Authorities</i>', (2018), a new Specific Planning Policy</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>Requirement (SPPR 3) was introduced that allows the Planning Authority (An Bord Pleanála in the case of SHD applications) to approve buildings of increased height, even where specific objectives of the relevant Development Plan or Local Area Plan may indicate otherwise.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.22.3: Creating synergies between the Town Centre and the Waterfront</b>			
<p>i) Submission notes that the aim to connect the waterfront with the town centre is a difficult one as Marine Road is not the most attractive entrance way, but the new connection ways particularly to Sussex Street via Harbour lodge is important.</p>	<b>B0077</b>	3	<p>The Executive notes the issue raised.</p> <p>Creating connections and synergies between the town centre and the waterfront is a key ambition of the UFP, an ambition that will be further supported by the two studies that have been commissioned with the aid of funding from the URDF. The importance of the connection of the waterfront to the town centre is acknowledged in the Draft Plan and the Sussex Street via Harbour Square connection is included in the UFP (Section 8.5.4: Crofton Road to Sussex Street). It is noted that the first phase of a pedestrian link between Sussex Street and Crofton Road has been delivered on foot of the redevelopment of the Harbour Yard and that the completion of this route has been incorporated into the redevelopment of the Old School House site (permitted under Reg. Ref: ABP-304249-19). As such, it is not considered that any additional policy support is required in order to achieve this connection.</p> <p>Connections between the waterfront and town centre are not just limited to physical connections, however. The establishment of complimentary uses that will draw footfall between the two locations, is also a key matter for the two studies that are currently being prepared with the aid of funding from the URDF. The recommendations of the two reports will be carefully considered by the Council on completion of those studies.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.22.4: The Waterfront and St Michaels Wharf</b>			
<p>i) Submission states that there is a need to engage in a more meaningful manner with Dún Laoghaire Harbour and postponement of decisions until the two ongoing studies are produced undermines public participation in the Development Plan</p>	<b>B0876</b>	3	<p>The Executive notes the issue raised.</p> <p>Whilst the timing of the two ongoing studies means that they are not yet progressed enough to inform the Draft Plan, a dynamic Urban Framework Plan for Dún Laoghaire town and the harbour has been in place since 2004 and has been renewed and updated with each</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>process and vision for the harbour. Overall principles for a vision to guide a planning framework for the harbour need to be produced as part of the Development Plan.</p>			<p>subsequent Development Plan. It has guided linking the town and the harbour, increasing the residential component of the town, delivery of the Lexlcon and vast improvements to the public realm (the Metals, and Haigh Terrace). The two studies will inform the future Dún Laoghaire and Environs LAP. The LAP process provides for full public consultation.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submissions request that the Council provide a free public skate park located at the ferry terminal or Carlisle pier. A state-of-the-art Skate park facility would provide healthy outdoor activities for young people and could attract users from all over the country all year round, putting Dún Laoghaire on the map as the top Irish destination for this (new Olympic) sport. A designated skate park would also help reduce conflicts with pedestrians in other locations.</p>	<p><b><u>B0340</u></b> <b><u>B0349</u></b> <b><u>B0362</u></b> <b><u>B0363</u></b> <b><u>B0444</u></b> <b><u>B0469</u></b> <b><u>B0474</u></b> <b><u>B0479</u></b> <b><u>B0506</u></b> <b><u>B1025</u></b> <b><u>B1026</u></b> <b><u>B1106</u></b> <b><u>B1146</u></b></p>	<p>3</p>	<p>The Executive notes the issue raised.</p> <p><b>The issues raised are operational in nature and not County Development Plan issues.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submission notes that the ferry terminal building or part thereof would make an excellent exhibition space.</p>	<p><b><u>B0540</u></b></p>	<p>3</p>	<p>The Executive notes the issue raised.</p> <p>The ferry terminal is zoned 'W' – <i>"To provide for waterfront development and harbour related uses"</i>. Under this zoning objective, 'cultural use' is 'permitted in principle' and specific proposals are dealt with through the development management process.</p> <p>A study has been commissioned to make recommendations as to the future of the harbour and its integration with the town. <b>Recommendations</b> can be considered for inclusion in the future Dún Laoghaire and Environs LAP.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Submission suggests, as the Ferry has stopped, the old Carlyle Pier and part of the Ferry Terminal could</p>	<p><b><u>B1077</u></b></p>	<p>3</p>	<p>The Executive notes the issue raised. It is noted that the locations referenced are zoned 'W' – <i>"To provide for waterfront development and harbour related uses"</i>, and that under this zoning</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
become Dún Laoghaire's Waterfront Restaurant/Jazz/Latin area.			<p>objective, special consideration and dispensations are provided specifically in respect of the Dún Laoghaire Harbour area, only. This involves the inclusion of additional uses as 'open for consideration' as follows: aparthotel, enterprise centre, hotel/motel, offices, off-license, public house, and science and technology-based industry. The zoning also carries the following note:</p> <p><i>"An objective of this Plan is to protect the harbour/ marine entity of Dún Laoghaire Harbour by facilitating harbour-related uses, but not to confine permitted uses in the harbour to a degree that exclusively attracts those with an interest in active maritime recreation. Any development proposal should seek to ensure public accessibility to the harbour and shorefront".</i></p> <p>As such, the uses referenced by the submitter would be either 'permitted in principle' or 'open for consideration' in the harbour area, with individual proposals being assessed through the development management process.</p> <p>It is noted that a study is currently being prepared for the harbour area under funding obtained by the Council through the URDF. It is anticipated that the study will make a series of recommendations for the future development of, and uses within, the harbour area.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
v) Submissions note that the potential redevelopment area to the west of the west pier should seek to explore the opportunity for investment in a major arts-based initiative, public park and water-based recreation and amenity uses. There is significant demand for public investment in multipurpose arts facilities, studios and exhibition and performance space for all the performance arts in Dún Laoghaire.	<b><u>B0876</u></b> <b><u>B1077</u></b>	3	<p>The Executive notes the issue raised. The location referenced is zoned 'W' – <i>'To provide for waterfront development and harbour related uses'</i>. Under this zoning objective, 'cultural use' is 'permitted in principle' and specific proposals are dealt with through the development management process.</p> <p>The Urban Framework Plan acknowledges the potential that this area must provide for uses and a variety of activities that would enliven the waterfront, while providing access to the water's edge. The UFP also acknowledges that access to this area would benefit from better connections across the DART line.</p> <p>A study has been commissioned to make recommendations as to the future of the harbour and its integration with the town. <b>Recommendations</b> can be considered for inclusion in the future Dún Laoghaire and Environs LAP.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.22.5: The Hospital and Boylan Centre</b>			
<p>i) Submission suggests that a new public space should be created at Boylan Community Centre, Sussex Street (could include residential, retail, parking). This is currently a no-go area due to antisocial behaviour.</p>	<b><u>B0077</u></b>		<p>The Executive notes the issues raised.</p> <p>This area is addressed in the Dún Laoghaire Urban Framework Plan (DLUFP) which states that any development on the Hospital lands and Boylan Centre should create a network of new streets and public spaces to foster a distinct sense of place that creates an attractive living and working environment, forming a series of secondary routes between George's Street, Crofton Road and Marine Road. It is also an objective of the UFP to consider the pedestrianisation of the area.</p> <p>In addition, it is an objective of the DLUFP to identify and encourage redevelopment of key sites at present under-utilised e.g. the Boylan Centre.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission suggests that a Digital Growth Hub should be located at the Former Senior College Dún Laoghaire building, Eblana Avenue Quarter.</p>	<b><u>B0430</u></b>	3	<p>The Executive notes the issue raised.</p> <p>The former Senior College building on Eblana Avenue is zoned 'MTC' – 'Major Town Centre' and a digital growth hub (office use) would be 'permitted in principle' at this location. Individual planning applications are assessed on their merits; however, a further Policy Objective has been included in the Draft Plan (See Section 3.6, and Chapter 6) to acknowledge the importance of co-working spaces in the post-pandemic era and their potential to contribute to the regeneration of, and activity in, town centres.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.22.6: Stable Lane/George's Place</b>			
<p>iii) <b>Stable Lane</b></p> <ul style="list-style-type: none"> <li>Submissions oppose the creation of a pedestrian/cyclist connection on Stable Lane from the former Council Depot at George's</li> </ul>	<p><b><u>B0083</u></b> <b><u>B0341</u></b> <b><u>B0396</u></b> <b><u>B0440</u></b> <b><u>B0552</u></b></p>	3	<p>The Executive notes the issue(s) raised.</p> <p>The current iteration of the DLUFP (Appendix 12 of the 2016-2022 County Development Plan) includes a map-based objective "to upgrade and seek pedestrian cycle permeability and linkage" from George's Street Lower to Crofton Road, via George's Lane and Stable Lane. The</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>Place (through the existing emergency door) to the Seafront.</p> <ul style="list-style-type: none"> <li>Submissions request the deletion of the following text from Section 8.5.6, Appendix 8: <i>'The ongoing redevelopment of the site offers an opportunity to provide a mixed-use redevelopment that includes educational uses and the Plan supports the adaptation and reuse of the existing buildings on the site including the sensitive redevelopment of the Protected Structures. The first phase of the development has anticipated a new pedestrian/cycle link between George's Place and Crofton Road and the completion of this route across Stable Lane to further strengthen the connectivity between Georges Street and the Waterfront is a strategic objective of this Plan Any redevelopment will include upgrades to the public realm along Georges Place to include traffic calming, extensive tree planting, pollinator planting schemes, creative water connectivity attenuation, wider paving, improved surfaces and new public lighting to create a stronger sense of place...'</i></li> <li>Also request the omission of objective 5 in section 8.8 of the Urban Framework Plan Objectives 'Encourage and provide for increased pedestrian and cycle permeability between George's Street and Crofton Road'.</li> </ul>	<p><u><b>B0567</b></u>  <u><b>B0616</b></u>  <u><b>B0623</b></u>  <u><b>B0625</b></u>  <u><b>B0776</b></u>  <u><b>B0778</b></u>  <u><b>B0856</b></u>  <u><b>B0883</b></u>  <u><b>B0938</b></u>  <u><b>B0956</b></u>  <u><b>B0990</b></u>  <u><b>B0991</b></u>  <u><b>B0998</b></u>  <u><b>B1044</b></u></p>		<p>objective to achieve this connection has carried through from the current iteration of the DLUPF to the Draft Plan (Appendix 8).</p> <p>There are a range of planning policy documents, in addition to the Draft Plan, that support the provision of direct pedestrian and cycle linkages, particularly in the vicinity of public transport infrastructure. These include <i>'Urban Design Manual – A Best Practice Guide', (2009)'</i> and the <i>'Design Manual for Urban Roads and Streets' (DMURS, 2019)'</i>. As such, the removal of any of the existing objectives from the Draft Plan, which relate to increased linkages and permeability is not considered to be in the best interest of the proper planning and sustainable development of the area and would also go against the overall policy thrust of the Draft Plan, which is focused on delivering on the 10-minute neighbourhood, which involves improving permeability.</p> <p><b>Recommendation</b>  No change to Draft Plan.</p>
<p>iv) <b>Old Fire Station, Georges Place</b>  Submissions request:</p> <ul style="list-style-type: none"> <li>The omission of Objective ED from the Fire Station site from zoning Map 3 and the</li> </ul>	<p><u><b>B0876</b></u>  <u><b>B0938</b></u>  <u><b>B0990</b></u></p>	3	<p>The Executive notes the issue raised.</p> <p>Policy Objective PHP7 of the Draft Plan, states as follows regarding schools:  <i>"It is a Policy Objective to protect existing schools and their amenities and ensure the reservation of primary and post-primary school sites in line with the requirements of the</i></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>substitution with objective AS to provide for Art Studios.</p> <ul style="list-style-type: none"> <li>The deletion of text in the Urban Framework Plan Appendix 8 which suggests educational use for the Old Fire Station.</li> <li>The deletion of "The Old Fire Station site" from Table 4.1: Location of future school sites.</li> </ul>			<p><i>relevant education authorities and to support the provision of school facilities and the development / redevelopment of existing schools for educational and other sustainable community infrastructure uses throughout the County".</i></p> <p>It is noted that the old fire station site at George's Place is the subject of a current application by the Department of Education (DoE) for the provision of a new primary school (D21A/0248). The DoE confirmed, as a part of the planning application process, that there is a demonstrable demand, both current and emerging, for a new primary school in the school planning area of Dún Laoghaire and that while a review of demographic trends is currently underway, work on the review is at a very advanced stage and preliminary indications are that there is continuing very strong demand for primary and post primary school places in the Dún Laoghaire School Planning Area. It is, therefore, not recommended to remove the 'ED' designation from the site.</p> <p>Schools are an important 'SNI' use that support families living in the area and active travel.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>v) Submission requests that a traffic management plan be implemented for Kelly's Avenue on foot of the proposed school development at Old Fire Station and to improve the existing situation.</p>	<b>B0940</b>	3	<p>The Executive notes the issue raised.</p> <p>There is a current planning application for a school at the former enterprise centre (old Fire station) on George's Place under Planning Register Reference D21A/0248, it is noted that further information has been requested and that the items include traffic management. In terms of the existing situation this would be an operation traffic management issue.</p> <p><b>This is, therefore, a development management and operational issue which is not a County Development Plan issue.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.22.7: Public Spaces</b>			
<p>i) Submissions request/suggest numerous public realm improvements as follows:</p>	<b>B0077</b> <b>B0283</b> <b>B1182</b>	3	<p>The Executive notes the issues raised many of which would be design issues for individual public realm enhancement schemes.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> <li>The area outside the St. Michaels Church property could be developed as a public space, public seating/feature fountain/floral planting.</li> <li>Remove the large granite bollards along Georges St lower which make the footpaths feel constricted.</li> <li>Suggest priority street scaping for George's Street, such as has been carried out in neighbouring towns.</li> </ul>			<p>A number of enhancement schemes are ongoing in the town (Myrtle square, temporary pedestrianisation of Georges Street and work to the public space adjoining St Michaels Church).</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<ul style="list-style-type: none"> <li>Submission requests the planting of more trees, and that climate change appropriate species, should be pursued.</li> </ul>	<b>B0905</b>	3	<p>The Executive notes the issue raised and would concur.</p> <p><b>Whilst not a County Development Plan issue there are a number of ongoing greening projects in the town.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission from Dún Laoghaire Tidy Towns states that they are willing to take on smaller projects for greening and biodiversity with DLRCOCO support and ensure delivery of real immediate improvements.</p>	<b>B1182</b>	3	<p>The Executive notes the issue raised.</p> <p><b>The work of the Council with any tidy towns on greening and biodiversity projects would be a matter for the community and parks sections and is not a County Development Plan issue.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submission expresses concern in relation to the amount of plant and tree growth from all parts of the buildings along Georges Street and surrounding streets.</p>	<b>B0141</b>	3	<p>The Executive notes the issue raised.</p> <p><b>The maintenance of individual private properties is a day-to-day matter for individual landowners and not a County Development Plan issue.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.22.8: George's Street</b>			
<p>i) Submission requests that Georges St. is pedestrianised with time-controlled delivery access and provide an enhanced public realm along</p>	<b>B0283</b>	3	<p>The Executive notes the contents of this submission.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
Georges St lower (west end) with increased footpath widths and potentially restricted car access.			<p>There is a trial pedestrianisation of parts of George's Street Lower and parts of Sussex Street and Convent Road being run this summer (2021). Various public realm interventions are being carried out, car access is being restricted and deliveries will be time controlled. The intention is to provide a town centre location that is accessible, attractive, and vibrant, including outdoor dining, planned cultural and entertainment events and activities that would appeal to a wide range of society, including families, children and older people and which activate and animate the pedestrianised area.</p> <p><b>This is not a County Development Plan issue.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.22.9: Principal Town Centre Quarter b) Marine Road to Bloomfield's Shopping Centre</b>			
i) Submission opposes pedestrianisation of area between Patrick Street to St Michael's Hospital due to impact on traffic. A lot of traffic is already diverted due to new cycle lanes.	<b>B0588</b>	3	<p>The Executive notes the issue raised.</p> <p>As set out above a trial pedestrianisation is underway this summer this is following a public consultation in June 2021. Full details can be found on the Council website.</p> <p>As part of the trial, traffic, mobility, footfall, and air quality in the area will be monitored and evaluated. It is planned to carry out surveys with businesses, customers, local residents and visitors to assess the impact of the trial pedestrianisation.</p> <p><b>This is not a County Development Plan issue.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.22.10: Park End Quarter</b>			
i) Submission suggests locating a Digital Growth Hub at Park House, 66 Georges Street, Dún Laoghaire (on the corner with Park Road).	<b>B0430</b>	3	<p>The Executive notes the issue raised.</p> <p>The location on Georges Street referenced is zoned 'MTC' – 'Major Town Centre' and a digital growth hub (office use), would be 'permitted in principle' at this location. Individual planning applications are assessed on their merits, however, a further Policy Objective has been included in the amended Draft Plan (Chapter 6) to acknowledge the importance of co-working</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>spaces in the post-pandemic era and their potential to contribute to the regeneration of, and activity in, town centres.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.22.11: Seafront Quarter, a) Marine Road to Crofton Road/Queen's Road and the DLR Baths</b>			
<p>i) Submission suggests a proposal to commission a funicular (cable railway) linking the seafront to the shopping centre should be considered to encourage additional activity and pedestrian footfall in the town centre.</p>	<b>B0009</b>	3	<p>The Executive notes the issue raised.</p> <p>The need to improve connectivity between the seafront and the town centre is acknowledged in the Interim Dún Laoghaire Urban Framework Plan, which includes an objective, <i>"to improve physical linkages and accessibility between the Town Centre and the Waterfront"</i>, while also seeking to increase activity in the Town Centre. The Council has commissioned two studies. Improved linkages to the seafront will form an important part of this work and recommendations for appropriate linkages/physical infrastructure will be considered in this context.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission requests that the Council renew the Dún Laoghaire baths for local amenity value.</p>	<b>B1150</b>	3	<p>The Executive notes the issue raised.</p> <p>Works at the Dún Laoghaire Baths are continuing and when complete will facilitate their use as a public amenity. The redevelopment includes the creation of new enhanced facilities for swimming and greater access to the water's edge by means of a short jetty. The Draft Plan also contains SLO 115, which states that it is an objective of the Council, <i>"to provide an open seawater pool as a part of any future phase of the development at the Dún Laoghaire Baths site. This provision shall take into account environmental feasibility, including ecological, water and cultural heritage sensitivities. Any proposals shall be subject to Appropriate Assessment Screening in accordance with the requirements of the EU Habitats Directive and shall ensure the protection and preservation of all designated SACs, SPAs, and pNHA(s) in Dublin Bay and the surrounding area"</i>.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
iii) Submission suggests that the Council reprise the proposals for a water sport centre and 50m saltwater swimming pool in the old Dún Laoghaire Ferry building, which would be a wonderful resource.	<b>B1150</b>	3	<p>The Executive notes the issue raised.</p> <p>The importance of water-based activity in the harbour area of Dún Laoghaire is supported by the Plan. An economic study is currently being prepared through URDF funding for the harbour area. This will inform the future Local Area Plan.</p> <p>As set out in the response above a new swimming facility is to be developed as part of the Baths redevelopment.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.22.12: Old Town Quarter a) Bloomfield's Shopping Centre to Library Road</b>			
i) <b>Bloomfields/Myrtle Square</b> Submission welcomes the development of Bloomfields/Myrtle Square, which creates an attractive centre point.	<b>B0077</b>	3	<p>The Executives notes the issue raised and the support provided.</p> <p>It is noted that work has commenced on this project.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
ii) Submission suggests the location of a Digital Growth Hub at No. 9 Georges Place and No. 3 Kellys Avenue, Dún Laoghaire (Formerly Offices and Stores for the Council Depot).	<b>B0430</b>	3	<p>The Executive notes the issue raised.</p> <p>The location at Georges Place referenced is zoned 'MTC' – 'Major Town Centre' and a digital growth hub (office use), would be 'permitted in principle' at this location. Individual planning applications are assessed on their merits; however, a further Policy Objective has been included in the Draft Plan (Chapter 6) to acknowledge the importance of co-working spaces in the post-pandemic era and their potential to contribute to the regeneration of, and activity in, town centres.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.22.13: Old Town Quarter b) Library Road to Cumberland Street</b>			
i) Submission raise issues in relation to the Carnegie Library as follows:	<b>B0283</b> <b>B0430</b>	3	<p>The Executive notes the issue raised and would concur with the sentiments of the submissions regarding the reuse of the building. The Carnegie Library building is a valuable historical asset and its reuse could contribute significantly to activity and vibrancy in this part of George's Street. SLO 38 of the Draft Plan states that it is an objective of the Council "That the future</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> <li>• Redevelop the Carnegie library as a Council run project - coworking, local offices?</li> <li>• Allow private commercial redevelopment.</li> <li>• Locate a Digital Growth Hub at the Former Carnegie Library Building – corner of Library Road &amp; Lower Georges Street.</li> </ul>			<p><i>uses associated with Dún Laoghaire Carnegie Library explore the option of community use, ensure active street frontage, make a positive contribution to the public realm and takes cognisance of its Protected status”.</i></p> <p>The location at the former Carnegie Library is zoned ‘MTC’ – ‘Major Town Centre’, and a digital growth hub (office use), would be ‘permitted in principle’ at this location. Individual planning applications are assessed on their merits; however, a further Policy Objective has been included in the Draft Plan (Chapter 6) to acknowledge the importance of co-working spaces in the post-pandemic era and their potential to contribute to the regeneration of, and activity in, town centres.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.22.14: The Gut/West Pier</b>			
<p>ii) <b>Access at Coal Quay Bridge and the Coal Harbour</b> Submission requests Objective 17 of the UFP is replaced as follows:</p> <p><i>‘To seek the designation of the access to the West Pier as a pedestrian priority zone’.</i></p>	<p><b>B0938</b> <b>B0990</b></p>	<p>3</p>	<p>The Executive notes the issue raised.</p> <p>The DLUFP Plan states (pg. 281) that <i>“the existing access to the Gut from the form the Coal Quay Bridge needs to be upgraded. Any significant re-development of the Gut/West Pier is entirely predicated on much improved vehicular, cycle and pedestrian access arrangements being facilitated.”</i></p> <p>Objective 17 follows from this assessment and states: <i>“Upgrade the road leading to the Coal Quay Bridge to the Gut and to explore the possibility of providing pedestrian access by way of a cantilevered boardwalk”.</i></p> <p>The submission is referring to a localised upgrade irrespective of any re-development of the Gut/West Pier. This is <b>not considered to be a County Development Plan issue</b> but a localised traffic/active travel issue which is an operational issue for the Council.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

### **3.23: Appendix 9 - Landscape Assessment Study and Landscape/Seascape Character Areas**

No submissions have been received raising issues with regard to Appendix 9



### 3.24: Appendix 10 - Ecological Network

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<b>3.24.1: Map B1</b>			
i) Submission request that Map B1 of the Ecological Network be extended southward, to cover the area of Killiney Bay.	<b><u>B1197</u></b>		The Executive notes the issue raised. The Ecological Network Map visually demonstrates the ecological network that currently exists across the County. The Council will undertake necessary ecological surveys, and update the habitat and species mapping for the County during the lifetime of the Plan.  <b>Recommendation</b> No change to Draft Plan.



### 3.25: Appendix 11 - Wind Energy Strategy

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
ii) The submissions state that: <ul style="list-style-type: none"> <li>Local Authorities should be cautious when considering the designation of areas so as not to constrain renewable energy potential, particularly for wind generation.</li> <li>Supportive of the action as envisaged under Policy Objective GIB3 and the preservation of coastal views as set out in the Draft Plan, however, it is important to ensure that this is achieved in a manner which is compatible with national offshore renewable energy, climate action and marine planning policies and plans.</li> <li>The Draft Plan supports the development offshore wind development when it is in an 'environmentally acceptable manner'.</li> </ul>	<u>B0591</u> <u>B0630</u> <u>B1029</u>		The Executive notes the issues raised.  The Executive recognises and supports the role of renewable energy generation in reducing carbon emissions and enabling Ireland to live up to its commitments in combatting climate change and transitioning to low carbon climate resilient economy. However, the location of renewable energy infrastructure and associated development has to be balanced with local conditions, including environmental designations (SPAs, SACs, etc.) as well as with the existing built environment and residential amenity. The Draft Plan has been prepared with due regard to national policy, including with regard to national offshore renewable energy, climate action and marine planning policies and plans.  <b>Recommendation</b> No change to Draft Plan.
iii) The County's densely populated urban nature means that traditional onshore wind farms cannot be developed, therefore, the focus is on offshore infrastructure and its integration into the onshore electricity transmission network.	<u>B0591</u>		The Executive notes and agrees with the issue raised.  Dún Laoghaire-Rathdown has a relatively limited range of Areas of Wind Potential (locations where suitable wind speeds exist), all of which are concentrated in the south-west of the County. This area also correlates to a high degree with areas that are zoned high Amenity (Zoning Objective G), with Special Protection Areas (SPA) and Special Areas of Conservation (SAC), the County's Built Heritage and associated buffers as well as with objectives to preserve views and prospects. There are therefore no opportunities for large scale onshore wind farm development, so the focus for large scale schemes will be on offshore proposals.  <b>Recommendation</b> No change to Draft Plan.
iv) Recommends that DLRC considers updating its Wind Energy Strategy to recognise the potential for the Irish Sea to accommodate offshore renewable energy development. Existing references in the plan are considered insufficient and should be expanded.	<u>B0591</u> <u>B0600</u> <u>B0612</u>		The content of the submission is noted in this regard. The Draft Development Plan includes Policy Objective CA11, which states as follows:  Policy Objective CA11: Onshore and Offshore Wind Energy and Wave Energy

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><i>It is a Policy Objective to support in conjunction with other relevant agencies, wind energy initiatives, both onshore and offshore, and wave energy, when these are undertaken in an environmentally acceptable manner. (Consistent with NSO 8 and NPO 42 of the NPF and RPO 7.36 and 10.24 of the RSES).</i></p> <p>It is considered that the above Policy Objective makes clear that offshore wind energy proposals are supported, subject to being undertaken in an environmentally sensitive manner, which is entirely appropriate. However, it is considered that the narrative in the Wind Energy Strategy regarding the development of offshore wind generation facilities could be expanded. However, it does need to be born in mind that these facilities will in most instances fall outside the jurisdiction of the County although elements such as interconnectors will require to make landfall and connection to the grid at some point.</p> <p><b>Recommendation</b>  Amend Appendix 11 – Wind Energy Strategy (pg: 321) by including the following new section under section 11.3:</p> <p><i>“11.3.10 Offshore Wind Energy  In the last decade there has been significant growth in Ireland’s renewable energy capacity, driven largely by the development of onshore wind generation infrastructure. However, Ireland possesses a significant offshore wind resource which has not been developed to the same extent and it is expected that the initial phases of offshore generation are likely to be focused on the east coast of the country in order to help to meet growing demands for energy in the region. In locations such as Dún Laoghaire-Rathdown where opportunities for the development of large onshore facilities are negligible, there is potential to develop the offshore wind resource where such facilities can be developed in an environmentally acceptable manner. Given the lack of suitable onshore locations and the strong wind resource off Ireland’s east coast, the greatest contribution that the County is likely to make in terms of large scale renewable energy development is likely to be in the form of offshore wind farm development and/or associated hybrid technologies. Indeed, offshore wind generation has the potential to play a key part in meeting Ireland’s 2030 climate change targets.</i></p> <p><i>It should be noted that the jurisdiction of planning authorities for determining applications for off-shore wind farms is limited and relates only to the landside infrastructure. The County</i></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p><i>Development Plan only relates to the jurisdiction of the County and does not cover infrastructure that falls outside that area which will be covered by the maritime Plan.</i></p> <p><i>A critical component of the development of offshore wind generation capacity is the ability to connect the offshore power generation infrastructure into the onshore electricity generation network. This generally consists of all of the components of a given project between the Mean High Water Mark (where water meets land) and the final point of connection into the existing transmission grid network. In the context of Dún Laoghaire-Rathdown, the final point of connection for offshore wind farms is likely to be at the 220 kilovolt (kV), where capacity exists to connect new offshore wind generation infrastructure."</i></p> <p><i>The above amendment will also require the numbering of Section 11.3.10 Summary to be updated to 11.3.11 Summary.</i></p>
<p>v) Policy changes have now put planning permission as the first stage of any renewable energy projects, prior to an application for a grid connection and route to market. Therefore, clear and supportive planning policies are required to ensure that Ireland meets the challenges of addressing climate change and decarbonising the Irish economy</p>	<b>B0591</b>		<p>The content of the submission is noted in this regard. The County Development Plan has been prepared having regard to a range of national, regional, and local plans and strategies and Section 28 guidelines as published by the Department of Housing, Planning and Local Government, including the NPF, RSES, CCAP, National Marine Planning Framework, Climate Action Charter, Guidelines and Wind Energy Development Guidelines.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>vi) Request that Policy Objective EI19: <i>Energy Facilities</i> is amended to the following (proposed additions in bold):</p> <p>It is a Policy Objective to encourage the provision of energy facilities in association with the appropriate service providers and in accordance with 'Government Policy Statement on the Strategic Importance of Transmission and Other Energy Infrastructure' (2012). In addition, the Council will facilitate the expansion of the services <b>and infrastructure</b> of existing service providers, notably Bord Gáis, Eirgrid, the Electricity Supply Board (ESB),</p>	<b>B0591</b>		<p>The content of the submission is noted and agreed in this regard. The Executive recognise the importance of addressing climate change through a reduction in carbon emissions and the role that wind energy has to play in this regard. The ability to connect appropriate offshore wind generation capacity to onshore electricity transmission network is a critical component of this.</p> <p><b>Recommendation</b> Update Policy Objective EI19 (p 202) in accordance with the submission and also by adding a reference to proper planning and sustainable development as follows:</p> <p><b>From:</b> <i>It is a Policy Objective to encourage the provision of energy facilities in association with the appropriate service providers and in accordance with 'Government Policy Statement on the</i></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p><b>other strategic electricity infrastructure developers and statutory undertakers</b>, in order to ensure satisfactory levels of supply and to minimise constraints for development.</p>			<p><i>Strategic Importance of Transmission and Other Energy Infrastructure' (2012). In addition, the Council will facilitate, the expansion of the existing service providers, notably Bord Gáis, Eirgrid, the Electricity Supply Board (ESB), in order to ensure satisfactory levels of supply and to minimise constraints for development.</i></p> <p>To:</p> <p><i>It is a Policy Objective to encourage the provision of energy facilities in association with the appropriate service providers and in accordance with 'Government Policy Statement on the Strategic Importance of Transmission and Other Energy Infrastructure' (2012). In addition, the Council will facilitate, <u>subject to the proper planning and sustainable development of the area, the expansion of the services and infrastructure of existing service providers, notably Bord Gáis, Eirgrid, the Electricity Supply Board (ESB), other strategic electricity infrastructure developers and statutory undertakers</u>, in order to ensure satisfactory levels of supply and to minimise constraints for development.</i></p>
<p>vii) Submission sets out a variety of concerns and issues in relation to two future offshore wind projects including concerns in relation to erosion and possible cliff collapse due to heavy engineering works, biodiversity and geological impacts and issues in relation to any cable making landfall. Submission requests that any proposals for wind energy development are accurately mapped and are subject to public participation.</p>	<b>B0630</b>		<p>The Executive notes the issues raised. Any planning application for a wind energy development which would be submitted with the Council or An Bord Pleanala (as the competent authority in relation to Strategic Infrastructure Development) would be legally required to include accurate maps as per the planning regulations. The Planning process allows for third party participation.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>viii) Welcome the inclusion in the Draft Plan of policies and objectives which acknowledge and support the development of offshore wind energy as well as supporting onshore infrastructure, as set out under Policy Objective CA11: <i>Onshore and Offshore Wind Energy and Wave Energy</i>, 'Policy Objective GIB7: <i>National Marine Planning Framework and Section 12.2.3 Wind Energy</i>.</p>	<b>B1029</b>		<p>The Executive notes the issues raised.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

### 3.26: Appendix 12 - Public Rights of Way/Recreational Access Routes

Post the Lissadell case, for a ROW to exist there must be evidence that the landowner has dedicated the relevant land to the public. It is only in those circumstances that a ROW of way can be brought forward for inclusion in the County Development Plan.

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<b>3.26.1: Public Rights of Way/Recreational Access Routes</b>			
<p>i) Submissions request the following:</p> <ul style="list-style-type: none"> <li>• Keep public Rights of Way intact and extend the network.</li> <li>• Prioritisation of rights of way as there has been an increase in people walking during the pandemic.</li> <li>• Attempts to close rights of way should be resisted.</li> <li>• Acknowledge importance of Rights of Way</li> <li>• All rights of way should be clearly marked and maintained and preserved free from development.</li> <li>• All applicants should include a LIA dealing with possible impacts on any existing rights of way or established walking routes.</li> <li>• Ensure that the assessment of wind energy development proposals will have regard to the impacts on public rights of way and walking routes.</li> <li>• Provision of various additional ROWs</li> <li>• Submissions welcome ROW and consider that they are ROWs are an amenity that support biodiversity and promote outdoor activities.</li> </ul>	<p><u><a href="#">B0114</a></u>  <u><a href="#">B0121</a></u>  <u><a href="#">B0504</a></u>  <u><a href="#">B0512</a></u>  <u><a href="#">B0549</a></u>  <u><a href="#">B0587</a></u>  <u><a href="#">B0594</a></u>  <u><a href="#">B0653</a></u>  <u><a href="#">B0653</a></u>  <u><a href="#">B0654</a></u>  <u><a href="#">B0712</a></u>  <u><a href="#">B0715</a></u>  <u><a href="#">B0716</a></u>  <u><a href="#">B0717</a></u>  <u><a href="#">B0722</a></u>  <u><a href="#">B0733</a></u>  <u><a href="#">B0739</a></u>  <u><a href="#">B0741</a></u>  <u><a href="#">B0744</a></u>  <u><a href="#">B0754</a></u>  <u><a href="#">B0761</a></u>  <u><a href="#">B0780</a></u>  <u><a href="#">B0783</a></u>  <u><a href="#">B0797</a></u>  <u><a href="#">B0802</a></u>  <u><a href="#">B0818</a></u>  <u><a href="#">B0847</a></u>  <u><a href="#">B1002</a></u></p>		<p>The Executive notes the issues raised, welcomes the support and acknowledges the importance of public rights of way, walking routes, recreational activities and amenities, which add to the amenity of the County and, therefore, should be preserved, where possible in the Development Plan. To this end, the Draft Plan incorporates Policy Objective GIB14: Public Rights-of-Way, which states that:</p> <ul style="list-style-type: none"> <li>• <i>“It is a Policy Objective to (i) preserve, protect, promote, and improve for the common good all existing public rights-of-way which contribute to general amenity; and</i></li> <li>• <i>(ii) Extend or enhance existing rights-of-way either by agreement with landowners or using compulsory powers in the interest of ensuring access to amenities, including the coast, upland areas, riverbanks, heritage sites and National Monuments.</i></li> <li>• <i>(iii) Prohibit development and keep free from obstruction existing rights-of-way, and to take legal action if necessary, to prevent any attempt to close them off.</i></li> <li>• <i>Prohibit development which would prejudice public access to existing rights-of- Way, unless the level of amenity is maintained by the right of way, footpath, or bridleway being diverted by the minimum practical distance and the route continues to be segregated from vehicular traffic.</i></li> <li>• <i>Consider favourably planning applications which include proposals to improve the condition and appearance of existing rights-of-way”.</i></li> </ul> <p>In relation to sign posting Policy Objective Policy Objective GIB17: Trails, Hiking and Walking Routes states that <i>“That all in use public rights of way including those over private lands be suitably signposted”.</i></p> <p>It is considered that the above provisions provide adequate policy support for rights of way within the County and address the issues raised by submitters in this regard.</p> <p><b>Recommendation</b>                      No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
	<p><b><u>B1013</u></b>  <b><u>B1013</u></b>  <b><u>B1149</u></b>  <b><u>B1163</u></b>  <b><u>B1171</u></b></p>		
<p>ii) Submission consider that all public ROW should be retained, however, if landowners are being disturbed maybe a compromise could be reached whereby ROWs are open on given days.</p>	<p><b><u>B0713</u></b></p>		<p>The Executive notes the issue raised but consider that the legislation does not necessarily provide for a flexible provision in relation to a legal Right of Way under section 14 of the Planning Act. However, there are alternatives which could be explored utilising consensual approaches such as was used in establishing the recreational access routes or by way of section 206 of the Act which allows for creation of a right-of-way by means of agreement with the landowners consent. The Draft Plan contains Policy Objective GIB15: Recreation Access Routes (RARs) which states that <i>“It is a Policy Objective to preserve all Recreation Access Routes, which contribute to general amenity”</i> and whilst the current RARs pertain to lands under the control of Coillte, they could also be used to access private lands subject to landowners agreement.</p> <p><b>Recommendation</b>  No change to Draft Plan.</p>
<p>iii) Submissions:</p> <ul style="list-style-type: none"> <li>• Consider that it is difficult to see some ROW on maps and requests that the Plan should have a sub map identifying all pedestrian routes/pathways between/across estates and roadways. Submission considers that these links have an important role to play in the 10-minute neighbourhood concept.</li> <li>• Request creation of a publicly accessible map</li> </ul>	<p><b><u>B0869</u></b>  <b><u>B1132</u></b></p>		<p>The Executive note the issues raised and acknowledges that the 14 County Development Plan maps show an incredible amount of detail.</p> <p>On the webmags it is possible to zoom in and see more detail. Development Plan maps are all publicly accessible. One submission references the myriad of permeability links that criss cross every geographical area of the County. The Executive would concur that these links play a critical role in the achievement of connectivity and support the achievement of the ten minute neighbourhood concept as they allow for active travel options. It is however respectfully considered that in a predominantly suburban County, it would not be possible to map every single such route on the County Development Plan maps or on a supplementary map.</p> <p>The Council have however included as part of the Draft Plan supplementary Map T2 which sets out the 3 proposed parking zones in the County. The Parking Zone Map is indicative and there may be potential for an area to move from one zone to another during the lifetime of the Plan due to local improvements in pedestrian permeability which would increase the</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>walkability catchment and/or future public transport provision. This map does show as many permeability links as were known but they are again shown at a very small scale so as to make the map usable.</p> <p>It should be noted that the Draft Plan states that <i>“The list of Rights of Way detailed in the Development Plan does not purport to include all public rights of way”</i></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Request that the Council provides a full status on any legal/court actions currently under way, with respect to existing, disputed or extinguished PROWs. This may be provided to Councillors - the last update appears to be from June 2013 item C/471 where a table was provided of resolved and not resolved proceedings.</p>	<b><u>B1163</u></b>		<p>The Executive notes the issue raised.</p> <p>Arising from the inclusion of various additional rights of way to the 2004 – 2010 County Development Plan a number of appeals were taken to the circuit court in accordance with the Planning and Development Act, 2000, (as amended). Whilst the outcome of any of those cases may inform a recommendation in this report the provision of an update on these cases would not be considered to be an amendment to the Draft Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>v) DLRCC should appoint a named person as contact for problems and updates on Rights-of-Ways.</p>	<b><u>B1013</u></b>		<p>The Executive note the issue raised. <b>However, the appointment of Council staff is an operational matter and not a matter for a land use document.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.26.2: Northumberland Avenue</b>			
<p>i) Request inclusion of the pathway connecting from Corrig Park to Northumberland Avenue and from Northumberland Avenue to Sydenham Mews and onward to Corrig Avenue as ROW in the Draft Development Plan</p>	<b><u>B0014</u></b>	3	<p>The Executive notes the issue raised. These are public routes along a road or path and therefore do not require to be shown as public rights of way.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.26.3: River Dodder</b>			

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
i) Request that the southern bank of the River Dodder between Clonskeagh Bridge and Classon's Bridge be shown as a ROW or Recreational Access Route.	<b><u>B0017</u></b>	1	<p>The Executive notes the issue raised. These are public routes through open space and therefore do not require to be shown as public rights of way.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.26.4: St. Laurance College, Loughlinstown</b>			
i) Submissions relate to St Laurence's College. There is no right of way over the lands or any part thereof at St. Laurence College, Wyattville Park, Loughlinstown and no reference to any such Right of Way should be included in the Development Plan.	<b><u>B0074</u></b> <b><u>B0095</u></b> <b><u>B0096</u></b> <b><u>B0097</u></b>	10	<p>The Executive notes the issue raised.</p> <p>Arising from the Lisadell case (Walsh and Cassidy v Sligo County Council), for a public right of way to exist, there must be evidence that the landowner has dedicated the relevant land to the public. An implied dedication of user may be inferred but such proof is capable of being rebutted by the landowner. The burden of proof which post Lisadell is now much higher than it was back in 2004, when a significant number of ROW were added to the Plan, lies solely with the party asserting it (in this instance, under section 14 of the Planning and Development Act, this would be the Council).</p> <p>Consultation on the Draft Plan and background work by the Executive has not brought to light evidence of long public use of the identified route and the landowner has made it clear that they do not consider that any public ROW exists nor would they be amenable to the creation of one. In any event "long user" (evidence of use of a way by an individual or indeed by a high number of individuals), does not of itself demonstrate to the Council that a public right of way has come into existence. It does not equate to dedication of a right of way.</p> <p>It is therefore considered that the St Laurence School ROW should be deleted from the Draft Plan.</p> <p><b>Recommendation</b> Delete reference to the ROW at 'St. Laurence's College from N11 entrance to Wyattville Estate' from Appendix 12, Section 12.1 <i>Public Rights of Way</i> and delete the ROW designation from the lands on Map 7.</p>
<b>3.26.5: Ballyedmonduff Green Road</b>			
i) Request the inclusion of the 'Ballyedmonduff Green Road' as a public right of way. This ancient route starts at the entrance to the Paddocks Riding	<b><u>B0076</u></b>	9	The Executive notes the issue raised

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
Centre, Ballyedmonduff, and runs south east for approx. 300m to the hamlet of Carthy's Green.			<p>DLR has a strong track record in displaying rights-of-way on the County Development Plan Maps, however, the Lissadell case has had a bearing on the ability of Local Authorities in including additional ROWs, as the burden of proof has become very high and rests solely with the Planning Authority.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.26.6: Tully Cross</b>			
<p>i) Lehaunstown, Tully Cross - There is an established right of way that covers the short distance between Lehaunstown Lane and the ancient cross, which has become blocked in recent times. Request its reinstatement.</p>	<b>B0744</b>	10	<p>The Executive notes the contents of this submission.</p> <p>Map 10 and Appendix 12 includes a ROW from "<i>Laughanstown lane to Celtic Cross</i>". This ROW and the Celtic Cross will be fully accessible to the public as they are located in Tully Park which will be a public park in the Cherrywood SDZ area. There may have been periods in the recent past when it was temporary in accessible due to construction works and health and safety requirements. With regard to the future park the Cherrywood Development Agency Project team have advised that there still needs to be a compliance assessment to ensure that all works have been completed to Taking in Charge standard</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.26.7: Glendruid</b>			
<p>i) Glendruid – There is an established trail through the woods along the Carrickmines Stream which has been blocked in recent years by development near the Brennanstown Luas stop and a bricked-up access gateway on Lehaunstown Lane. Request that a formal ROW is established to access the site (see submission below which also reference access to Glendruid/Brennanstown Dolmen).</p>	<b>B0744</b>	7, 10	<p>The Executive notes the contents of this submission.</p> <p>In making a right-of-way the burden of proof rests with the Local Authority and, therefore, sufficient supporting evidence is required in order to allow the Council make the decision on whether a right-of-way should or should not be made.</p> <p>It should be noted that the Development Plan does not purport to include every right-of-way in the County. Section 14 (7) (a) of the Planning and Development Act 2000 – 2010 states that "<i>Nothing in this section shall effect the existence or validity of any public right-of-way which is not included in the development plan</i>" which can be interpreted to mean that rights-of-way exist even when they are not included in the County Development Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.26.8: Kilmashogue</b>			
<p>i) Submission raises concerns in relation to maturing trees and intimidating signs on the ROW leading to the top of Kilmashogue mountain.</p>	<b><u>B0744</u></b>	8	<p>The Executive notes the issue raised. The Draft Plan includes a right of way over Kilmashogue mountain, known as the Kilmashogue Lane to Kilmashogue Mountain ROW (Map 8). The ROW connects to the Wicklow Way to the north and to the east and to Kilmashogue Lane to the west. The Planning Authority deals with complaints regarding blocking and obstruction of public rights-of-way. These complaints are referred to the Legal Service Department to advise on the course of action to be taken in accordance with Section 208 of the <i>Planning and Development Act, 2000, (as amended)</i>. The Planning Authority also work collaboratively with the Dublin Mountain Partnership and Coillte on access to the Dublin Mountains. It is noted that the submission is referring to foliage and signage as opposed to any specific blockage.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.26.9: Barnacullia</b>			
<p>i) There are well used access points to Three Rock mountain from Barnacullia that are not currently marked on the ROW map. It is recommended that these be formally recorded as ROWs. The routes are as follows:</p> <ul style="list-style-type: none"> <li>• Path heading northwest of Murphystone quarry</li> <li>• From the top of the lane just south of the Blue. Light pub, the trail heading west towards the nearby radio antennae connecting on the far side to Ticknock Road.</li> <li>• The laneway above Flanagan &amp; Co. connecting to the forest trail above.</li> </ul>	<b><u>B0744</u></b> <b><u>B1163</u></b>	8	<p>The Executive notes the issue raised. For a public right of way to exist, there must be evidence that the landowner has dedicated the relevant land to the public, either by deed or through its use as such throughout living memory. The burden of proof for demonstrating that a ROW exists has become very high and rests solely with the Planning Authority and, therefore, sufficient supporting evidence is required in order to allow the Council make the decision on whether a Right-of-Way should be included in the development plan. Long user" (evidence of use of a way by an individual or indeed by a high number of individuals), does not of itself demonstrate to the Council that a public right of way has come into existence. It does not equate to dedication of a right of way</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.26.10: Dingle Glen</b>			
<p>i) Various submission raise issues in relation to Dingle Glen as follows:</p> <ul style="list-style-type: none"> <li>• Request the retention of existing ROW</li> </ul>	<b><u>B0250</u></b> <b><u>B0653</u></b> <b><u>B0654</u></b> <b><u>B0655</u></b>	9 10	<p>The Executive notes the issue raised.</p> <p>The Draft Plan includes an existing ROW from Ballycorus Road to Dingle Glen. For a public right of way to exist, there must be evidence that the landowner has dedicated the relevant</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<ul style="list-style-type: none"> <li>Request a variation to the ROW which passes through a farmyard on Dixon Lane due to hedgerow growth.</li> <li>Request that the Council considers new PROW from Glenamuck Road South to Dingle Glen (via Wayside Celtic Football Club or Glenamuck Cottages).</li> <li>ROW from Ballycorus Road to Dingle Glen is blocked</li> <li>ROW was previously extended to the Glenamuck road but that is not marked on the County Development Plan map.</li> </ul>	<p><u><b>B0656</b></u>  <u><b>B0660</b></u>  <u><b>B0661</b></u>  <u><b>B0662</b></u>  <u><b>B0663</b></u>  <u><b>B0666</b></u>  <u><b>B0670</b></u>  <u><b>B0671</b></u>  <u><b>B0675</b></u>  <u><b>B0686</b></u>  <u><b>B0692</b></u>  <u><b>B0695</b></u>  <u><b>B0697</b></u>  <u><b>B0699</b></u>  <u><b>B0700</b></u>  <u><b>B0705</b></u>  <u><b>B0706</b></u>  <u><b>B0707</b></u>  <u><b>B0716</b></u>  <u><b>B0718</b></u>  <u><b>B0719</b></u>  <u><b>B0727</b></u>  <u><b>B0733</b></u>  <u><b>B0740</b></u>  <u><b>B0744</b></u>  <u><b>B0750</b></u>  <u><b>B0756</b></u>  <u><b>B0760</b></u>  <u><b>B0796</b></u>  <u><b>B0868</b></u>  <u><b>B0888</b></u>  <u><b>B0895</b></u>  <u><b>B0898</b></u>  <u><b>B0907</b></u></p>		<p>land to the public, either by dedication or by use of the right of way by the public for the period of living memory. Any variation to an existing right of way, which takes an alternate path across a given landowners lands, must similarly be dedicated by the landowner. Simply altering the route on the development plan maps would not have the effect of changing the route of the ROW.</p> <p>The Lissadell case has had a strong bearing on the ability of Local Authorities in including additional ROWs, as the burden of proof has become very high and rests solely with the Planning Authority. It is therefore not recommended that additional ROWs be included in this area.</p> <p><b>Recommendation</b>  No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
	<u><b>B0918</b></u> <u><b>B1091</b></u> <u><b>B1163</b></u>		
<b>3.26.11: Ski Club</b>			
i) The Right of way from the Dublin Mountain way accessing the lands beside the ski club and going through the Fairy Village and forest, exiting out on the Killegar Road must be retained for the benefit of public Use.	<u><b>B0578</b></u> <u><b>B1091</b></u> <u><b>B1159</b></u> <u><b>B1165</b></u>	13	The Executive notes this issue. The Draft Plan includes two rights of way in the area, as follows: <ul style="list-style-type: none"> <li>• Barnaslingan lane to Scalp and Enniskerry Road via various routes in Barnaslingan Wood, and</li> <li>• Scalp Villa, Enniskerry Road to Ballybetagh Road.</li> </ul> These rights of way have been included in the Draft Plan and it is not proposed that they be removed. It is noted that this area forms the boundary with Wicklow County Council. <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.26.12: Rathmichael</b>			
i) The ROW from Rathmichael Road to Brides Glen road is currently overgrown and largely impassable. Requests that the development Plan contains a new objective to reopen Rathmichael Lane from Rathmichael Road to Brides Glen Road and to provide suitable paving and lighting.	<u><b>B0744</b></u> <u><b>B0909</b></u> <u><b>B1163</b></u>	10	The Executive notes the issue raised. As noted in submissions, the Draft Plan includes a right of way, known as the 'Brides Glen Road to Rathmichael Road via Rathmichael Cemetery to Rathmichael Wood' ROW. <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.26.13: Marino Avenue West ROW</b>			
i) Various issues raised in relation to proposed ROW on Marino Avenue West as follows: <ul style="list-style-type: none"> <li>• Pedestrian only – No objection to the preservation of Marino Avenue West as a public ROW in respect of pedestrians and under the strict understanding that the ROW is restricted to foot traffic</li> </ul>	<u><b>B0082</b></u> <u><b>B0289</b></u> <u><b>B0360</b></u> <u><b>B0526</b></u>	7	The Executive notes the issues raised. Section 14 of the Planning and Development Act, 2000, (as amended) does not grant the Council the power to identify a public right of way in a Development Plan, but rather to include in the development plan a provision to preserve a specific public right of way <p>The Lissadell case has had a strong bearing on the ability of Local Authorities in including additional ROWs. For a public right of way to exist, there must be evidence that the landowner has dedicated the relevant land to the public, either by deed or through its use as such</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> <li>• Taking in charge – The Council must take Marino Avenue West in charge.</li> <li>• Present rights – Owners shall retain all present rights over Marino Avenue West pursuant to their title documents.</li> <li>• Indemnity – The Council will provide public liability insurance and/or indemnity to residents.</li> <li>• Parking – The parking of motor vehicles must be prohibited and that double yellow lines will be provided on both sides of the road.</li> <li>• Maintenance Plan – Request that in accordance with the provisions of the <i>Roads Act 1993</i> the Council puts in place an annual maintenance plan for Marino Avenue West to include the installation and upkeep of appropriate street lighting.</li> </ul>			<p>throughout living memory. The burden of proof for demonstrating that a ROW exists has become very high and rests solely with the Planning Authority and, therefore, sufficient supporting evidence is required in order to allow the Council make the decision on whether a Right-of-Way should be included in the development plan. "Long user" (evidence of use of a way by an individual or indeed by a high number of individuals ), does not of itself demonstrate to the Council that a public right of way has come into existence. It does not equate to dedication of a right of way</p> <p>The responses that have been received by submitters indicate that while Marino Avenue West has been used over recent decades by members of the public as a pedestrian route, no details of dedication or use since time immemorial have been submitted. While existing residents have indicated that they would be agreeable to it being used for pedestrian access (and not for vehicular traffic), it is not considered that the evidence is sufficient to pursue Marino Avenue West as a public right of way, in the absence of a clear dedication of a ROW by the landowner.</p> <p>In response to other items raised in the submissions received, there is no provision in section 14 of the Planning Act which would empower or require the Council to grant an indemnity to the residents of Marino Avenue West. Similarly, a ROW does not mean that it would be in the charge of the Council as a public road. It would be necessary for the Council to undertake the statutory procedure under section 11 of the Roads Act 1993.</p> <p><b>Recommendation</b> Delete reference to the ROW at 'Marino Avenue West off Killiney Hill Road' from Appendix 12, Section 12.1 <i>Public rights of Way</i> and delete the ROW designation from the lands on Map 7.</p>
<b>3.26.14: Ticknick</b>			
<p>i) Re-establish a PROW from Spur west of Heronford Lane to Ticknick.</p>	<b>B1163</b>	10	<p>The Executive notes the issue raised. The "Spur west of Heronford Lane to Ticknick" was originally included in the 2004 – 2010 Dún Laoghaire-Rathdown County Development Plan and later included in error in the 2010-2016 Plan. A Circuit Court Appeal was taken in 2004 and investigations were then carried out by the Council and arising from these it was discovered that the route had been inserted in error as the Council did not have sufficient proof to include it as a public ROW. It therefore cannot be reinstated in the 2022-2028 Plan.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			No change to Draft Plan.
<b>3.26.15: Access to Historical Sites</b>			
i) Seeking the protection of access to the Kiltiernan Dolmen, access across the property of Bishopsland has already been removed. Seeking reinstatement. Alternatively, a new shorter ROW could be established from either the new Bishops Gate or Glebe Rd developments.	<u><b>B0250</b></u> <u><b>B0656</b></u> <u><b>B0716</b></u> <u><b>B0733</b></u> <u><b>B0740</b></u> <u><b>B0744</b></u> <u><b>B0796</b></u> <u><b>B1126</b></u> <u><b>B1159</b></u> <u><b>B1163</b></u> <u><b>B1165</b></u>	9	The Executive notes the issue raised. A right of way that was described as " <i>Bishops Lane to Druids Alter via Kiltiernan Abbey</i> " was included in the County Development Plan 2004-2010, however, it was removed following appeals to the Circuit Court.  In terms of the establishment of a new route, a new ROW can only be created by Statute or the landowner must dedicate the relevant land to the public.  <b>Recommendation</b> No change to Draft Plan.
ii) Establish a PROW to access the Glendruid Dolmen. This could be from Brennanstown Road to Glenamuck Road North (Carrickmines LUAS station), and/or to Lehaunstown Lane.  Establish a PROW to access Larch Hill Dolmen, from Mutton Lane to Kilmashogue Lane.	<u><b>B0716</b></u> <u><b>B0740</b></u> <u><b>B0744</b></u> <u><b>B0796</b></u> <u><b>B1163</b></u>	10	The Executive notes the issues raised. Section 14 of the Planning and Development Act, 2000, (as amended) does not grant the Council the power to identify a public right of way in a Development Plan, but rather to include in the development plan a provision to preserve a specific public right of way. For a public right of way to exist, it must have been created by Statute or there must be evidence that the landowner has dedicated the relevant land to the public.  <b>Recommendation</b> No change to Draft Plan.
<b>3.26.16: Ballybetagh/Kiltiernan</b>			
i) Seeking the protection of the Enniskerry Rd to Ballybetagh Road ROW - A medieval mass path that enables people to travel to Kilegar safely as the Ballybetagh road is dangerous due to lack of a footpath. ROW is currently blocked by the owners who have lodged a planning application for business/residential uses. Oppose the removal of the ROW and the development of the lands.	<u><b>B0250</b></u> <u><b>B0653</b></u> <u><b>B0654</b></u> <u><b>B0655</b></u> <u><b>B0656</b></u> <u><b>B0660</b></u> <u><b>B0661</b></u> <u><b>B0662</b></u> <u><b>B0663</b></u> <u><b>B0666</b></u> <u><b>B0670</b></u>	13	The Executive notes the issue raised. The Draft Plan includes several rights of way in this area, two to the west of the Enniskerry Road, 1) the Scalp Villa, Enniskerry Road to Ballybetagh Road ROW and 2) the Enniskerry Road (opposite Kiltiernan Grange) to Ballybetagh Road via Ballybetagh Wood ROW. The plan also includes a ROW to the east of the Enniskerry Road, the Barnaslingan Lane to Enniskerry Road (opposite entrance to Kiltiernan Hotel) ROW.  It is also noted that in a planning permission granted by an Bord Pleanála for an equine breeding and training centre of excellence in the area (D15A/0453; PL06D.246501) on which a condition was included for the preservation of the Enniskerry Road (opposite Kiltiernan Grange) to Ballybetagh Road via Ballybetagh Wood ROW, on the basis that it was listed in the

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
	<p><u>B0671</u>  <u>B0675</u>  <u>B0686</u>  <u>B0692</u>  <u>B0695</u>  <u>B0697</u>  <u>B0699</u>  <u>B0700</u>  <u>B0705</u>  <u>B0706</u>  <u>B0707</u>  <u>B0719</u>  <u>B0727</u>  <u>B0743</u>  <u>B0744</u>  <u>B0750</u>  <u>B0756</u>  <u>B0760</u>  <u>B0868</u>  <u>B0888</u>  <u>B0895</u>  <u>B0898</u>  <u>B0907</u>  <u>B0918</u>  <u>B0952</u>  <u>B0955</u>  <u>B1002</u>  <u>B1091</u>  <u>B1159</u>  <u>B1162</u>  <u>B1163</u>  <u>B1165</u></p>		<p>development plan and that the development plan includes an objective for the preservation of the listed ROW (Appendix 12 of the Draft Plan).</p> <p>In terms of any possible blockages of ROW, the Planning Authority deals with complaints regarding blocking and obstruction of public rights-of-way. These complaints are referred to enforcement and Legal Service Department to advise on the course of action to be taken in accordance with the relevant provisions of the legislation.</p> <p>In relation to mass paths it is noted that Action 2.2.3 of the Draft Heritage Plan 2021 - 2025 is to <i>“Map and develop projects on the historic paths we tread; mass routes, military routes, designed avenues, sheep walks and pedestrian links through the urban fabric, to the coast and into the mountains”</i>.</p> <p><b>Recommendation</b>  No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
ii) The rights of ways from the Ballybetagh road, which leads to a small old oak Forrest, is well used and should be retained (no map submitted)	<b>B0718</b>	13	<p>The Executive notes this issue. The Lissadell case has had a strong bearing on the ability of Local Authorities in including additional ROWs, as the burden of proof has become very high and rests solely with the Planning Authority. It is therefore not recommended that additional ROWs be included in this area.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.26.17: Killiney</b>			
i) Protect the right of way at Mullins Hill across Killiney golf course.	<b>B0733</b>	7	<p>The Executive notes the issue raised. The draft development plan includes three ROW across Killiney Golf Course as follows:</p> <ul style="list-style-type: none"> <li>• Church Road via Killiney Golf Club to Glenalua Road.</li> <li>• Killiney Golf Club Pavilion to Roches Hill.</li> <li>• Claremont Road via Roches Hill to Glenalua Road.</li> </ul> <p>There is no proposal to remove these ROWs from the Draft development plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

### 3.27: Appendix 15 - Green Infrastructure Strategy

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
i) Submissions welcome appendix 15. GI Strategy. One submission notes that updates are required particularly in relation to National CFRAM and PFRA references.	<u>B0432</u> <u>B0563</u>		<p>The Executive welcomes the issue raised in this submission. It is stated in Policy Objective GIB1: Green Infrastructure Strategy that <i>"It is the Council's intention to review and update the existing Green Infrastructure Strategy for the County in consultation will all key stakeholders and with the public during the lifetime of the County Development Plan, 2022- 2028."</i> The references to the CFRAM and PFRA will be updated as part of that process.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
ii) Appendix 15 refers to Bullock Harbour only in terms of boat rental and not in terms of access to coastline / pedestrian / visual amenity value.	<u>B0426</u>	4	<p>The Executive notes the issue raised but consider that the comment is made without full reference to the relevant section in Appendix 15. The reference to boat hire from Bullock relates to commentary on access to Dalkey Island and is part of a more general section entitled coastal recreation. The green infrastructure strategy is not considered to need to contain a full inventory of all amenities in every coastal location in the County</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
iii) Submission requests that Map A2 be updated to show the ownership of lands.	<u>B1168</u>		<p>The Executive notes the issue raised. Issues regarding ownership are beyond the scope of the County Development Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
iv) Submission notes that the Green Infrastructure report references the importance of rivers and streams for ecology such as the River Slang, however this is not carried through into the detailed strategies for protection of the environment	<u>B1046</u>	1	<p>The Executive notes the issue raised but would not concur. Policy Objective GIB24: Rivers and Waterways of the Draft Plan references the importance of rivers and waterways in the County. This objective aims to protect rivers, streams and other watercourses and maintain them in an open state capable of providing suitable habitat for fauna and flora, including fish. Existing County flood plain management policy seeks to limit development in identified floodplains, and to preserve riparian corridors.</p> <p>It is stated in Policy Objective GIB1: Green Infrastructure Strategy that <i>"It is the Council's intention to review and update the existing Green Infrastructure Strategy for the County in consultation will all key stakeholders and with the public during the lifetime of the County Development Plan, 2022- 2028"</i>.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>It further states that, “The Strategy will identify key green infrastructure aims” which will include associated ecosystems services... “with support from the forthcoming DLR County Wildlife Corridor Plan, 2021, and objectives for the County taking account of the main Policy Objectives identified in the County Development Plan”.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

**3.28: Appendix 16 - Strategic Flood Risk Assessment 2022-2028**

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<b>3.28.1: General</b>			
i) Submission: <ul style="list-style-type: none"> <li>• Welcomes various Policy Objectives contained in the Draft Plan</li> <li>• Considers flood zone images are small and difficult to read</li> <li>• Recommends that flood zone maps are referenced in the SFRA appendix</li> <li>• Notes reference to Annex A in Dundrum which is then not included</li> <li>• Notes reference to <a href="http://www.floodmaps">www.floodmaps</a> which is no longer used for historic flood events, <a href="http://www.floodinfo.ie">www.floodinfo.ie</a> is the new website</li> </ul>	<b>B0432</b>		The Executive notes the issues raised and considers that the Appendix 16 SFRA should be amended accordingly. <p><b>Recommendation</b> Amend Appendix 16 as follows:</p> <ul style="list-style-type: none"> <li>• Delete reference to “Annex A” from Table of Contents.</li> <li>• Append flood zone images/maps in a larger scale to the end of Appendix 16.</li> <li>• Insert following before Appendix 16 Table 3-1 in Section 3.2 <i>“The flood maps are shown in Section 6 of this document and are also reproduced at a larger size in Appendix A and B, and maps for the whole County are shown in the Mapping section of the County Development Plan.”</i></li> <li>• Insert following before Appendix 16 Table 7-1 in Section 7 <i>“The flood maps shown in the following sections are also reproduced at a larger size in Appendix A, and maps for the whole County are shown in the Mapping section of the County Development Plan.”</i></li> <li>• Replace all references of “<a href="http://www.floodmaps.ie">www.floodmaps.ie</a>” with “<a href="http://www.floodinfo.ie">www.floodinfo.ie</a>”</li> </ul>
ii) OPW submissions raises queries in relation to the SFRA as follows: <ul style="list-style-type: none"> <li>• Requests clarity as to when the Development Plan Justification Test applies</li> <li>• Requests clarity on flood sources</li> <li>• Request clarity on use of historic records</li> </ul>	<b>B0432</b>		The Executive notes the issues raised. Arising from items raised in the OPW submissions the Executive have reviewed the SFRA and are recommending various amendments to address issues raised in relation to the. Development Plan Justification Test, flood sources. The Executive are also recommending a new section on nature-based solutions. <p><b>Recommendation</b> Update the first sentence of the third paragraph of Appendix 16 Section 2.6 as follows: <i>“Where rezoning is not considered appropriate, exceptions to the development restrictions are provided for through the <a href="#">Development Plan Justification Test</a>.”</i></p> <p>Update the first sentence of the last paragraph of Appendix 16 Section 2.6 as follows:</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation															
			<p><i>“A Planning circular (PL2/2014<sup>1</sup>) <del>has also been issued which</del> provides greater clarity on the need to apply the Justification Test to existing development and areas which are proposed for redevelopment, included as Section 4.27a of the Planning Guidelines.”</i></p> <p>Update Appendix 16 Table 3-1 as follows (Amendments underlined):</p> <table border="1" data-bbox="1055 440 2078 1318"> <thead> <tr> <th data-bbox="1055 440 1312 531"><i><b>Data</b></i></th> <th data-bbox="1312 440 1563 531"><i><b>Description / Coverage</b></i></th> <th data-bbox="1563 440 1821 531"><i><b>Quality</b></i></th> <th data-bbox="1821 440 2078 531"><i><b>Data used in developing Flood Zones</b></i></th> </tr> </thead> <tbody> <tr> <td data-bbox="1055 531 1312 1058"><i>JFLOW® (JBA’s multi-scale two-dimensional hydraulic fluvial flood modelling software)</i></td> <td data-bbox="1312 531 1563 1058"><i>Covers full study area, including all watercourses with catchment greater than 3km<sup>2</sup>.</i></td> <td data-bbox="1563 531 1821 1058"><i>Low - Moderate</i></td> <td data-bbox="1821 531 2078 1058"><i>Some minor watercourses, and the upstream reach of some CFRAM watercourses. <u>Flood zones developed from this source will be treated as a guidance/flagging tool only and will not be relied upon by either the Planning Authority or applicant in the making of planning decisions.</u></i></td> </tr> <tr> <td data-bbox="1055 1058 1312 1318"><i>OPW Preliminary Flood Risk Assessment (PFRA) flood maps</i></td> <td data-bbox="1312 1058 1563 1318"><i>The PFRA was a national screening exercise that was undertaken by OPW to identify areas at potential risk of flooding.</i></td> <td data-bbox="1563 1058 1821 1318"><i>Low</i></td> <td data-bbox="1821 1058 2078 1318"><i>Some minor watercourses, and the upstream reach of some CFRAM watercourses. <u>Flood zones developed from this source will be treated as a</u></i></td> </tr> </tbody> </table>				<i><b>Data</b></i>	<i><b>Description / Coverage</b></i>	<i><b>Quality</b></i>	<i><b>Data used in developing Flood Zones</b></i>	<i>JFLOW® (JBA’s multi-scale two-dimensional hydraulic fluvial flood modelling software)</i>	<i>Covers full study area, including all watercourses with catchment greater than 3km<sup>2</sup>.</i>	<i>Low - Moderate</i>	<i>Some minor watercourses, and the upstream reach of some CFRAM watercourses. <u>Flood zones developed from this source will be treated as a guidance/flagging tool only and will not be relied upon by either the Planning Authority or applicant in the making of planning decisions.</u></i>	<i>OPW Preliminary Flood Risk Assessment (PFRA) flood maps</i>	<i>The PFRA was a national screening exercise that was undertaken by OPW to identify areas at potential risk of flooding.</i>	<i>Low</i>	<i>Some minor watercourses, and the upstream reach of some CFRAM watercourses. <u>Flood zones developed from this source will be treated as a</u></i>
<i><b>Data</b></i>	<i><b>Description / Coverage</b></i>	<i><b>Quality</b></i>	<i><b>Data used in developing Flood Zones</b></i>															
<i>JFLOW® (JBA’s multi-scale two-dimensional hydraulic fluvial flood modelling software)</i>	<i>Covers full study area, including all watercourses with catchment greater than 3km<sup>2</sup>.</i>	<i>Low - Moderate</i>	<i>Some minor watercourses, and the upstream reach of some CFRAM watercourses. <u>Flood zones developed from this source will be treated as a guidance/flagging tool only and will not be relied upon by either the Planning Authority or applicant in the making of planning decisions.</u></i>															
<i>OPW Preliminary Flood Risk Assessment (PFRA) flood maps</i>	<i>The PFRA was a national screening exercise that was undertaken by OPW to identify areas at potential risk of flooding.</i>	<i>Low</i>	<i>Some minor watercourses, and the upstream reach of some CFRAM watercourses. <u>Flood zones developed from this source will be treated as a</u></i>															

<sup>1</sup> Department of Environment, Community and Local Government, Planning Circular PL2/2014 (13/08/2015)

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p data-bbox="1832 280 2063 536"><u><i>guidance/flagging tool only and will not be relied upon by either the Planning Authority or applicant in the making of planning decisions.</i></u></p> <p data-bbox="1055 576 1962 635">Remove the second sentence of the second paragraph of Appendix 16 Section 3.4.1: <u><i>“This is typical of the Rover Dodder.”</i></u></p> <p data-bbox="1055 675 2033 767">Add the following sentence to the end of paragraph 4 of Section 4.1, Appendix 16: <u><i>“and the details on the application of the Justification test for Plan Making, also detailed in Section 6.”</i></u></p> <p data-bbox="1055 807 1733 833">Add title “5.1 Development Scenarios” to the start of Section 5.</p> <p data-bbox="1055 873 2063 995">Add the following text to the end of the first paragraph of Section 5.1, Appendix 16. <u><i>“These scenarios are focused on the Flood Zones, but consideration also needs to be given to flood risk identified through historic records and marked as an ‘Area of Flood Risk Concern’ on the Flood Zone maps (see Section 3-3 for more details).”</i></u></p> <p data-bbox="1055 1035 1697 1094">Remove the last sentence from the end of Section 5.1 <u><i>“Further details of such locations are provided in Section 5.”</i></u></p> <p data-bbox="1055 1134 1536 1193">Add new title to the beginning of Section 5.0 <u><i>“5.1 Development Scenarios”</i></u></p> <p data-bbox="1055 1233 2063 1356">Add the following text to the end of the first paragraph of Section 5.1: <u><i>“These scenarios are focused on the Flood Zones, but consideration also needs to be given to flood risk identified through historic records and marked as an ‘Area of Flood Risk Concern’ on the Flood Zone maps (see Section 3-3 for more details).”</i></u></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>Remove the following sentence from the end of Section 5.2.1 Minor Development:  <del>“Further details of such locations are provided in Section 5.”</del></p> <p>Replace Section 5.2.2 Highly vulnerable development in Flood Zone A or B with the following text:  <del>“5.2.2 Highly vulnerable development in Flood Zone A or B other than Minor Development Development which is highly vulnerable, as defined in The Planning Guidelines, includes (but is not limited to) dwelling houses, hospitals, emergency services and caravan parks (see Table 2-2 for further information).</del></p> <p><b><del>New development</del></b>  <del>It is not appropriate for new, highly vulnerable, development to be located in Flood Zones A or B outside the core of a settlement. Such proposals do not pass the Justification Test for Development Plans other than in those areas deemed to have passed the Development Plan Justification test in Section 5. Instead, a less vulnerable or water compatible use should be considered.</del></p> <p><del>In some cases, land use objectives which include for highly vulnerable uses have been justified in the Development Plan. This includes zonings focused around an urban core which allow for a mix of residential, commercial and other uses. In such cases, a sequential approach to land use within the site must be taken and will consider the presence or absence of defences, land raising and provision of compensatory storage, safe access and egress in a flood and the impact on the wider development area. The supporting Flood Risk Assessment must take into account residual risks, including the impacts of climate change.</del></p> <p><b><del>Existing developed areas</del></b>  <del>The Planning Circular (PL02/2014) states that “notwithstanding the need for future development to avoid areas at risk of flooding, it is recognised that the existing urban structure of the country contains many well established cities and urban centres which will continue to be at risk of flooding. In addition, development plans have identified various strategically important urban centres ... whose continued consolidation, growth, development or generation, including for residential use, is being encouraged to bring about compact and sustainable growth.”</del></p> <p><del>In cases where specific development proposals have passed the Justification Test for Development Plans, the outline requirements for a flood risk assessment and flood management measures are detailed in this SFRA in the following sections and the site specific assessments in</del></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><i>Section 5.6, which also detail where such development has been justified. Of prime importance is the requirement to manage risk to the development site and not to increase flood risk elsewhere and to consider residual risks. In particular, a sequential approach to land use within the site must be taken and will consider the presence or absence of defences, land raising and provision of compensatory storage, safe access and egress in a flood and the impact on the wider development area. The supporting Flood Risk Assessment must take into account residual risks, including the impacts of climate change.”</i></p> <p>Add the following text to Section 5.2.3 Less vulnerable development in Flood Zone A or B <u>“other than Minor Development”</u></p> <p>Update Section 5.3 text in the second paragraph as follows: <u>“1 in 200-year 0.5% AEP”</u></p> <p>Add the following text to the end of the first paragraph of Section 5.5: <u>“, as should the impacts of climate change.”</u></p> <p>Update the first sentence of the second paragraph of Section 5.5 as follows: <i>For sites within Flood Zone A or B, and which have either passed the Plan Making Justification Test or are classified as ‘Minor Development’ in accordance with Section 5.2.1, a site specific “Stage 2 - Initial FRA” will be required and subject to the outcome <del>would most likely</del> may need to be developed into a “Stage 3 - Detailed FRA”.</i></p> <p>Update the second bullet point of Section 5.5.1 as follows:</p> <ul style="list-style-type: none"> <li>• <i>“Has passed <del>Pass</del> the Justification Test for Development Plans under this SFRA and can pass the Justification Test for Development Management to the satisfaction of the Planning Authority.”</i></li> </ul> <p>Update the first two bullet points of Section 5.8.3 Finished Floor Levels as follows:</p> <ul style="list-style-type: none"> <li>• <i>“As a minimum, for highly vulnerable and <del>most</del> less vulnerable development, finished floor levels are to be set, <del>as a minimum,</del> above the 1% AEP fluvial (0.5% AEP tide) level, with an appropriate allowance for climate change (see Table 5-1 4-2) plus a freeboard of at least 300mm. The freeboard allowance should be assessed, and the choice justified.</i></li> </ul>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<ul style="list-style-type: none"> <li><i><u>In situations concerning <del>For some</del> less vulnerable development, where the risks of climate change are included in the development through adaptable designs or resilience measures, it is possible that a finished floor level as low as the 1% AEP fluvial or 0.5% tidal levels could be adopted, provided the risks of climate change are included in the development through adaptable designs or resilience measures. This approach should reflect emergency planning and business continuity to be provided within the development. It may reflect the design life of the development, the proposed use, the vulnerability of items to be kept in the premises, the occupants and users, emergency plan and inclusion of flood resilience and recovery measures. In a tidal context, the analysis should also take into account emerging research on sea level rise.”</u></i></li> </ul> <p>Insert the following new section after Section 5.8.4:</p> <p><i><u>“5.8.5 Nature based solutions / Green Infrastructure Nature-based measures can be adopted in river environments that aim to retain water on the landscape during periods of high rainfall and flood by mimicking the functioning of a natural landscape, thereby reducing the magnitude of flood events and providing complimentary ecosystem services. In general, nature-based measures aim to:</u></i></p> <ul style="list-style-type: none"> <li><i><u>Reduce the rate of runoff during periods of high rainfall;</u></i></li> <li><i><u>Provide flood storage in upper catchment areas; and</u></i></li> <li><i><u>Use natural materials and “soft” engineering techniques to manage flooding in place of “hard” engineering in river corridors.</u></i></li> </ul> <p><i><u>Nature-based measures to control flooding typically focus on the use of porous surfaces in developments (Sustainable Urban Drainage Systems or SUDS), planting of native vegetation communities/assemblages that are tolerant of both wet and dry conditions and reversing the impacts of over-engineered river corridors (river restoration) to reduce the peak of flood events by mimicking the function of a natural catchment landscape. In addition to providing flood relief benefits, nature-based solutions can provide an array of ecosystem services including silt and pollution control for runoff entering the river system, improved riparian and in-river habitats, localised temperature reduction during periods of</u></i></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><u>extreme heat, reduced maintenance requirements in engineered systems, groundwater recharge, and carbon sequestration.</u></p> <p><u>These measures can be implemented across an array of scales, for instance across a catchment as part of a wider flood relief scheme, or on a site-specific basis as part of a landscaping or green infrastructure plan. Nature-based solutions can provide flood mitigation benefits and ecosystem services across all scales if given adequate planning and should be considered during the site layout and design stages of a development. “</u></p> <p>Update Section 5.9 Green Corridor as follows:  <i>“It is recommended that, where possible, and particularly where there is greenfield land adjacent to the river, a 'green corridor', is retained on all rivers and streams. This will have a number of benefits, including:</i></p> <ul style="list-style-type: none"> <li>• <i>Retention of all, or some, of the natural floodplain;</i></li> <li>• <i><u>Opportunities to undertake works to restore natural in-river processes and habitats;</u></i></li> <li>• <i>Potential opportunities for amenity, including riverside walks and public open spaces;</i></li> <li>• <i>Maintenance of the connectivity between the river and its floodplain, encouraging the development of a full range of <u>riparian and floodplain habitats;</u></i></li> <li>• <i>Natural attenuation of flows <u>in the immediate floodplain</u> will help ensure no increase in flood risk downstream;</i></li> <li>• <i>Allows access to the river for maintenance works;</i></li> <li>• <i><u>The presence of a riparian buffer or green corridor can improve water quality, minimise pollution impacts and have significant benefits for ecology and biodiversity on the bank and in channel.</u></i></li> <li>• <i><u>Helping to achieve “Good” Ecological Status for river waterbodies under the EU Water Framework Directive (WFD);</u></i></li> </ul>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<ul style="list-style-type: none"> <li><i>Retention of clearly demarcated areas where development is not appropriate on flood risk grounds, and in accordance with the Planning Guidelines, and provides a buffer to allow for climate change impacts on flood extents.</i></li> </ul> <p><i>The width of this corridor should be determined through undertaking of a river restoration strategy, but can also be indicated by the available land, and topographical constraints, such as raised land and flood defences, but would ideally span the fully width of the floodplain (i.e. all of Flood Zone A). The DLR Green Infrastructure Strategy has identified core green corridors which have been mostly formed along watercourses.”</i></p> <p>Add the following text to the first paragraph of row three of Section 6.2.3 Blackrock District Centre:  <i>“Wave overtopping analysis has indicated the potential for impacts, particularly under future climate scenarios (see Section 6.3) to properties on the seafront.”</i></p>
<p>iii) Geohazards e.g. Flooding, coastal erosion, can cause widespread damage to landscapes, wildlife, human property and human life. Submission recommends that geohazards be taken into consideration.</p> <p>The data from the national Groundwater Flooding project may be useful in relation to Flood Risk Assessment (FRA) and management plans.</p>	<p><b>B0249</b></p>		<p>The Executive notes the issues raised.</p> <p>Flooding and Coastal Defence and their potential impacts have been considered in Appendix 16 (Flooding) and in section 10.8. (Coastal Protection). It is considered Appendix 16 should be updated to reference the data of the Geological Survey Ireland.</p> <p><b>Recommendation</b>            Replace sentence at the end of Appendix 16 Section 3.4.6 (page 13)  <i>“It should be assessed on a site by site basis through percolation testing and bore holes.”</i></p> <p>With the following text:  <i>“Data available on the Geological Survey Ireland map viewer<sup>2</sup> has been examined and found no particular karst or other ground water systems within the catchment, although one spring / well is noted to the west of Cherrywood. There are no recorded historic or predictive groundwater flood extents within the County. Groundwater risks should be assessed on a site by site basis through percolation testing and bore holes as appropriate.”</i></p>

<sup>2</sup> <https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0ab2fbde2aaac3c228>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>iv) Submission welcomes discussion on climate change in the SFRA but considers that it has not been considered in the plan making stage and is only considered in development design.</p>	<p><b>B0432</b></p>		<p>The Executive notes the issue raised. In response to the issue raised by the OPW in relation to Climate Change amendments are proposed to the Draft Plan to provide clarity. Following consultation with the OPW, it is considered that Lands should not be rezoned based solely on current flood extents as this will exclude these lands from anything other than water compatible development for the lifetime of the plan. The Flood Policies within the County Development Plan and Appendix 16 SFRA allow for applications to be assessed based on the most up to date flood data available, including the results of detailed modelling in Site Specific Flood Risk assessments. It allows for applications to be assessed in light of Flood Alleviation Schemes that are completed during the lifetime of the plan. It also allows applications adjacent to watercourses, in areas that have not been previously mapped via CFRAMS or National Indicative Fluvial Mapping (NIFM), to be appropriately assessed following detailed local catchment modelling.</p> <p><b>Recommendation</b>                      Insert new section after Section 2.3 in Appendix 16:</p> <p><b><i><u>“2.4 Incorporation of Climate Change into the SFRA</u></i></b>  <i><u>Climate change has been addressed at both the Plan Making and Development Management stages of development management as part of this SFRA.</u></i></p> <p><i><u>From a Plan Making perspective, the Flood Zones for the current and future scenarios were compared with a view to identifying locations where climate change impacts could be significant, (i.e. where there was a significant difference between the current and future extents in both Flood Zone A and B). In locations where there was a difference in extents, further consideration was given to how development proposals could be managed in the processes contained in this SFRA. Consideration was also given to the presence or otherwise of flood defences, and where a flood relief scheme is ongoing or planned it was noted that an adaptation plan would be an integral part of the scheme design. The findings of this assessment are noted in the relevant risk reviews in Section 5.</u></i></p> <p><i><u>Climate change risk mitigation through development management is also addressed in the recommendations for the scope of site specific FRAs and in the discussion on potential flood</u></i></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation								
			<i>mitigation measures, including consideration of site layouts and landscaping, finished floor levels and design of drainage systems and SUDS. This is detailed in Section 6.”</i>								
<p>v) Submissions request that consideration be given to inclusion of the following in the Draft Plan:</p> <ul style="list-style-type: none"> <li>Objective to state that all applications for development must be accompanied by an SFRA (this is stated in the SFRA but not in written statement).</li> <li>Objective on wave overtopping and impact of climate change on sea levels.</li> </ul>	<b>B0432</b>		<p>The Executive notes the issue raised in relation to SSFRAs.</p> <p>Requirements for detailed SSFRAs are set out in Appendix 16 and have to be read in the context of the document in its entirety. It is considered that a specific objective in the written statement without inclusion of other relevant information may thus be mis-leading.</p> <p>The Executive has noted the observation in relation to wave overtopping and impact of climate change on sea levels. A Coastline risk and wave overtopping Study has been undertaken to inform the Coastal Flooding section of Appendix 16 and provide further guidance for applicants in coastal areas. A number of scenarios were examined and mapped including a Mid Range Future Scenario (MRFS) with a 0.5 metre rise in sea level, a High End Future Scenario (HEFS) with a 1 metre rise in sea level and High + End Future Scenario (H+EFS) with a 1.5 metre rise in sea level, however it is not intended to use these scenarios in the Flood Zones A and B but they will be used to show wave overtopping extents.</p> <p>Flood risk arises from both still water flooding and wave action and topography plays a role. A series of coastal risk maps with a traffic light system have been developed which show areas at particular risk from sea levels rising and or wave overtopping These maps are proposed to be included to indicate the type of flood risk relevant to different sections of the coast. Details are set out as to what will be required to be included for any application for development in an area affected.</p> <p><b>Recommendation</b> Insert the following text after the fifth row of Table 3-1, Section 3.2, Appendix 16:</p> <table border="1" data-bbox="1055 1177 2074 1372"> <thead> <tr> <th data-bbox="1055 1177 1312 1275"><i>Data</i></th> <th data-bbox="1312 1177 1563 1275"><i>Description / Coverage</i></th> <th data-bbox="1563 1177 1821 1275"><i>Quality</i></th> <th data-bbox="1821 1177 2074 1275"><i>Data used in developing Flood Zones</i></th> </tr> </thead> <tbody> <tr> <td data-bbox="1055 1275 1312 1372"><i>Coastal risk and wave overtopping Study, commissioned</i></td> <td data-bbox="1312 1275 1563 1372"><i>DLR coastline</i></td> <td data-bbox="1563 1275 1821 1372"><i>Moderate</i></td> <td data-bbox="1821 1275 2074 1372"><i>Still water flood zones reviewed against ICPSS, but</i></td> </tr> </tbody> </table>	<i>Data</i>	<i>Description / Coverage</i>	<i>Quality</i>	<i>Data used in developing Flood Zones</i>	<i>Coastal risk and wave overtopping Study, commissioned</i>	<i>DLR coastline</i>	<i>Moderate</i>	<i>Still water flood zones reviewed against ICPSS, but</i>
<i>Data</i>	<i>Description / Coverage</i>	<i>Quality</i>	<i>Data used in developing Flood Zones</i>								
<i>Coastal risk and wave overtopping Study, commissioned</i>	<i>DLR coastline</i>	<i>Moderate</i>	<i>Still water flood zones reviewed against ICPSS, but</i>								

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation			
			<p><u>by DLR and completed as part of a Stage 3 assessment to this SFRA.</u></p>			<p><u>not used as little difference. Overtopping extents indicate a screening area for site specific FRAs.</u></p>
			<p>Insert the following text at the end of Appendix 16 Section 3.4.2:</p> <p><u>The Government has recently established an Inter-Departmental Group on Coastal Change Management to scope out an approach for the development of a national coordinated and integrated strategy to manage the projected impact of coastal change to our coastal communities, economies, heritage, culture and environment. The Inter-Departmental Group is jointly chaired by the Department of Housing, Planning and Local Government and the OPW and will bring forward options and recommendations for the Government to consider as soon as possible. Should these recommendations be available during the lifetime of the plan they will be given due consideration and assessed for impacts on the SFRA.</u></p>			
			<p>Add the following text to the end Appendix 16 Section 6.3 Coastal Flooding:</p> <p><u>An analysis of coastal risks has been carried out as part of this SFRA, which included a reappraisal of still water sea levels, building upon work undertaken in the ICPSS, and an assessment of wave overtopping potential. The findings of the coastal risk assessment have culminated in wave overtopping risk areas, and the characterisation of the coastal flood risk along the DLR coastline based on still water and wave overtopping risks. A traffic light colour coded map was generated to clearly define coastal flood risk areas and is included in Figure 6-10 to Figure 6-15 and in Appendix B. Further details of this classification system are provided in Section 6.3.1.</u></p> <p><u>In Booterstown and Blackrock (Figure 6-10), flooding extends from the coast at Booterstown Marsh towards Rock Road, staying on the coastal part of Rock Road for the present day and MRFS and overflowing above the road for the HEFS. The 29th Dublin Blackrock Scout Group premises is falling within the flood extents for all scenarios as well as the properties lying in between Brighton Vale and Seapoint Avenue.</u></p>			

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><u><i>The section of the railway line from Booterstown to Dún Laoghaire Harbour is impacted as well as Dún Laoghaire quays and piers Figure 6-10). Sandycove, Forty Foot point and Bullock Harbour are impacted (Figure 6-11), showing many properties at risk during the HEFS scenario.</i></u></p> <p><u><i>South of Bullock Harbour to the Shanganagh River, the elevation of the inland areas rises rapidly and therefore, the flood extent is limited to the beach areas (Figure 6-12). In Shanganagh the wastewater treatment plant is at risk from the MRFS and above.</i></u></p> <p><u><i>South of the Shanganagh river, the coast is again quickly rising in elevation and therefore the flood extent is limited to the beach and coastline areas. A large part of the coastline is fronting rural or natural areas (Figure 6-13 to Figure 6-15).</i></u></p> <p><u><i>Figure 6 10: Booterstown to Blackrock coastal risk (County Development Plan 2022-2028 Flood Zone Map 2)</i></u></p> <p><u><i>Figure 6 11: Dún Laoghaire to Dalkey coastal risk (County Development Plan 2022-2028 Flood Zone Maps 3&amp;4)</i></u></p> <p><u><i>Figure 6-12: Dalkey coastal risk (County Development Plan 2022-2028 Flood Zone Maps 4&amp;7)</i></u></p> <p><u><i>Figure 6-13: Loughlinstown coastal risk (County Development Plan 2022-2028 Flood Zone Maps 7&amp;10)</i></u></p> <p><u><i>Figure 6-14: Shankill coastal risk (County Development Plan 2022-2028 Flood Zone Maps 10&amp;14)</i></u></p> <p><u><i>Figure 6-15: North of Bray coastal risk (County Development Plan 2022-2028 Flood Zone Map 14)</i></u></p> <p><u><i>6.3.1 Coastal risk maps</i></u></p> <p><u><i>The DLR coastline was divided into segments of theorised coastal flood risk exposure. These segments were assigned either a ‘High’, ‘Medium’ or ‘Low’ coastal flood risk.</i></u></p> <p><u><i>For each segment, the risk was determined based on analysis of the projection model results, considering the present day and sea level rise scenarios that aim to account for both extreme still water level and potential wave overtopping flood risk. The starting point for the characterisation was therefore based on topographic elevation, ICWWS extreme sea levels, and future sea level rise estimates. The lower the topography of a specific location the greater</i></u></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><u><i>the coastal flood risk. The flood risk classification was then further developed based on consideration of the still water and wave overtopping risks.</i></u></p> <p><u><i>The coastal flood risk classification is shown in Figure 6 10 to Figure 6 15 and in Appendix B and the general summary of the classification is as follows:</i></u></p> <ul style="list-style-type: none"> <li>• <u><i>High (red): Flooding risks under both still water flooding and wave action.</i></u></li> <li>• <u><i>Medium (amber): Flooding risks from either still water flooding or wave overtopping only. Includes locations that are sheltered from wave action but are at risk of extreme water level flooding.</i></u></li> <li>• <u><i>Low (green): Limited or negligible flood risk.</i></u></li> </ul> <p><u><i>The maps above also show the extent of wave overtopping risk associated with the 1% AEP H+EFS in addition to the Flood Zones.</i></u></p> <p><u><i>Proposals for development along the coastline must consider the following factors as part of the flood risk assessment:</i></u></p> <ul style="list-style-type: none"> <li>• <u><i>Flood Zone A, B or C – guidelines for development within the Flood Zones is as the guidance in Section 5.</i></u></li> <li>• <u><i>Vulnerability to wave overtopping – Regardless of the Flood Zone, all proposals for development within the extent of the 1% AEP H+EFS wave overtopping outline should be accompanied by an appropriately detailed assessment of overtopping risk.</i></u></li> <li>• <u><i>Flood risk summary classification – the following recommendations are made in respect of the analysis needed in each of the flood risk classifications (red, amber and green).</i></u> <ul style="list-style-type: none"> <li>○ <u><i>For green areas, the flooding risks are limited and therefore further flood modelling might not be needed.</i></u></li> <li>○ <u><i>For the amber and red areas, there is a potential for still water flooding and/or wave overtopping risks. In these areas, further numerical modelling may be needed to assess the flooding risks in more details, and this modelling may conclude that development, particularly in the high risk (red) sectors, is not sustainable. The recommended numerical modelling would consist of the steps described below:</i></u> <ul style="list-style-type: none"> <li>▪ <u><i>Numerical wave modelling to transform waves from the offshore to the nearshore</i></u></li> <li>▪ <u><i>Wave overtopping calculations using empirical equations, Neural Network method...</i></u></li> </ul> </li> </ul> </li> </ul>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<ul style="list-style-type: none"> <li>▪ <u>2D hydraulic flood inundation</u></li> </ul> <p>Add the following definitions to Appendix 16 Section 8 Glossary:</p> <p><i>“High end future scenario (HEFS): One of the climate change scenarios described in the OPW Guidance note on climate change (Assessment of Potential Future Scenarios for Flood Risk Management, 2009), which indicates a 30% increase in river flows and a 1m increase in sea level rise. This is intended to represent a more extreme potential future scenario, but one that is nonetheless not significantly outside the range of accepted predictions available, and with the allowances for increased flow, sea level rise, etc. at the upper the bounds of widely accepted projections.”</i></p> <p><i>“Medium range future scenario (MRFS): One of the climate change scenarios described in the OPW Guidance note on climate change (Assessment of Potential Future Scenarios for Flood Risk Management, 2009), which indicates a 20% increase in river flows and a 0.5m increase in sea level rise. This is intended to represent a ‘likely’ future scenario, based on the wide range of predictions available and with the allowances for increased flow, sea level rise, etc. within the bounds of widely accepted projections.”</i></p> <p>Update all Development Plan flood maps to include wave overtopping extents.</p>
<p>vi) Submission request that the Council could follow the example of Kilkenny who requires that for development in any area within or adjoining a flood zone, or flood risk area, a site specific Flood Risk Assessment should be undertaken in accordance with the Flood Risk Assessment Guidelines<sup>36</sup>.</p> <p>If a Site Specific FRA demonstrates an unmanageable level of flood risk and/or impacts to 3rd party lands, development should not be allowed and should be refused.</p> <p>Proposals for mitigation and management of a flood risk should only be considered where avoidance is</p>	<p><b><u>B1088</u></b></p>		<p>The Executive note and concur fully with the issues raised.</p> <p>This is the approach supported by the policy set out in Appendix 16 and Chapters 10 and 12 of the written statement. All site specific Flood Risk Assessment are required by the Draft Plan to be undertaken in accordance with the Flood Risk Assessment Guidelines. All future applications will be assessed against the policies of the Plan which will ensure via the development management process that development will not take place where there is flood risk (subject to the requirements and provisions (which include exceptions) of Appendix 16))</p> <p><b>Recommendation</b> No Change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
not possible and where development can be clearly justified with the Guidelines Justification Test.			
vii) Policies in relation to drainage and attenuation along with policies on flood risk require further consideration along with application of the DM flood risk Justification Test	<b><u>B0836</u></b> <b><u>B0848</u></b> <b><u>B0889</u></b>		<p>The Executive notes the issue raised. Other than on lands that have passed the Justification Test for Plan Making in Table 6-2 and those lands identified in Section 6 (where appropriate limitations or specific FRA requirements may have been detailed in the SFRA) the overarching principles of Flood Risk Management Guidelines for Planning Authorities of "Avoidance" and "Substitution" will apply and the applicant / developer cannot move on to the Development Management Justification Test.</p> <p><b>Recommendation</b> No Change to Draft Plan.</p>
<p>viii) Flooding concerns and coastal defences should be a priority in the County Development Plan.</p> <p>Stormwater Management Plans and SuDS policies in low lying areas need to be reviewed and updated in the context of rising sea-levels.</p> <p>Sea defences and expert advice on this should be a high priority focus.</p> <p>Risk of flooding due to climate change has not been addressed sufficiently in the Plan – little consideration in the SFRA of risk of flooding due to rising sea levels caused by climate change.</p>	<b><u>B0949</u></b>		<p>The Executive notes the issues raised in relation to SuDS policies.</p> <p>As part of the County Development Plan process SuDS policies have been reviewed and updated. See Sections 10.2.2.6, 10.2.2.9 and Appendices 7 &amp; 16:</p> <p>The Executive notes the issues raised in relation to coastal defences and rising sea-levels.</p> <p>The SFRA has been updated to note the establishment of the Inter-Departmental Group on Coastal Change Management and to make provision for consideration, during the lifetime of the County Development Plan 2022 -2038, of any options, recommendations or policies following a Government decision. <b>The lead authority on provision of flood defences is the OPW and not the Council.</b></p> <p>A Coastal risk and wave overtopping Study has been carried out in response to the issues raised in submissions. As set out in detail above, it is recommended that the Coastal Flooding section of Appendix 16 be updated accordingly, which includes a reappraisal of still water sea levels, building upon work undertaken in the Irish Coastal Protection Strategy Study (ICPSS), and an assessment of wave overtopping potential.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			See detailed responses and recommendations above which outlines proposed amendments which comprehensively address both climate change and the risk of flooding due to rising sea levels caused by climate change.
<b>3.28.2: Site Specific submissions</b>			
i) Flood defences should be a focus in Dún Laoghaire town.	<b><u>B0905</u></b>		<p>The Executive notes the issue raised in relation to flood defences in Dún Laoghaire Town.</p> <p>The SFRA has been updated to note the establishment of the Inter-Departmental Group on Coastal Change Management and to make provision for consideration, during the lifetime of the County Development Plan 2022 -2038, of any options, recommendations or policies following a Government decision. <b>The lead authority on provision of flood defences is the OPW and not the Council.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Appendix 16 – The text in relation to the Dundrum Slang seems to allow for considerable development which could negatively impact the residents within the flood risk areas for example the development of the Central Mental Hospital site.</p> <p>Therefore, the submission suggests ensuring that the risk of flooding to properties along the River Slang are managed. There should also be an objective that bridges across the River Slang be assessed for potential of blockage and that remedial works be undertaken to manage such a risk.</p>	<b><u>B1046</u></b>		<p>The Executive notes the issues raised.</p> <p>The items raised in the submissions are addressed in Policy Objective E16: Sustainable Drainage Systems and in Appendix 16. Management of watercourses, unless in public areas, are the responsibility of the riparian landowners. Where an application is made for development on site where there is flood risk a Flood Risk Assessment will be required which will address site specific issues. <b>The level of detail requested by the submission is not appropriate to a County Development Plan.</b></p> <p><b>Recommendation</b> No Change to Draft Plan.</p>
iii) Previous submission in relation to flooding, SuDS, Stormwater Management Plans, flood relief works, coastal protection works, localised flooding in Sandycove/Glathule made at pre draft stage, seeking expert advice was not responded to.	<b><u>B0949</u></b>		<p>The Executive notes the issues raised in relation to flood defences in coastal areas and specifically and Sandycove/Glathule area.</p> <p>The SFRA has been updated to note the establishment of the Inter-Departmental Group on Coastal Change Management and to make provision for consideration, during the lifetime of the County Development Plan 2022 -2038, of any options, recommendations or policies following a Government decision.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>Storm surges and overtopping need a medium to long term response – suggest installation of retractable steel barrier.</p> <p>Storm surge barrage- County Development Plan should refer to possibility of County Development Plan objectives being assisted by this issue being considered a national/regional project</p>			<p>A Coastal risk and wave overtopping Study has been carried out in response to the Public Consultation submissions. As set out in detail above, it is recommended that the Coastal Flooding section of Appendix 16 be updated accordingly, which includes a reappraisal of still water sea levels, building upon work undertaken in the Irish Coastal Protection Strategy Study (ICPSS), and an assessment of wave overtopping potential.</p> <p>Local pluvial flooding issues have been addressed in the aftermath of the October 2011 rainfall event. Further consideration of Local pluvial flooding issues, should they arise, are a matter for DLRCC Operations section. It is recommended that the text in relation to what are termed “Areas of Flood Risk Concern” be amended to provide more clarity.</p> <p><b>In relation to the provision of a retractable steel barrage, this level of detail is beyond the remit of the County and Plan and the lead authority on provision of flood defences is the OPW and not the Council.</b></p> <p><b>Recommendation</b></p> <p>See detailed responses and recommendations above which outlines proposed amendments which comprehensively address both climate change and the risk of flooding due to rising sea levels caused by climate change.</p> <p>Insert the following new section after Section 3.2 of Appendix 16:  <u>“3.3 Areas of Flood Risk Concern shown on Flood Zone Maps</u>  <u>Non-specific address locations that may be subject to localised flooding from sources other than out-of-bank river flooding have been identified in the flood maps by triangles as follows:</u></p> <ul style="list-style-type: none"> <li>• “P” (<i>green triangle</i>) - <i>pluvial (rainfall) foul sewage overflow</i></li> <li>• “P” (<i>blue triangle</i>)- <i>pluvial (rainfall) surface water overflow</i></li> <li>• “F” (<i>blue triangle</i>)- <i>Fluvial - (river/watercourse) surface water overflow</i></li> </ul> <p><u>The purpose of identifying these areas is to alert potential applicants of the necessity to consult with the Local Authority as to the nature, source, and possible extent(s) that may be</u></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<i>impacted. Following such consultations a site specific flood risk assessment to factor in and mitigate against flood risk identified, if any, needs to be prepared, the details of such measures being set out in Section 5."</i>
<p>iv) Submission relates to a site on Commons Road Shankill and considers that if there was to be a failure in the system in Cherrywood there would be a significant impact down stream including Commons Road.</p> <p>As a result of published flood risk plans many houses cannot gain insurance.</p> <p>Request that the Draft Plan be amended to include a specific objective to progress the Loughlinstown Scheme in an expedient manner.</p>	<b>B0980</b>		<p>The Executive notes the issue raised. DLRCC continues to work in cooperation with the OPW in the delivery of approved flood relief schemes and in particular in the Carrickmines/Loughlinstown. Deansgrange streams' catchments. Elements of the flood relief scheme(s) have already been delivered with Option Assessment, Scheme Development and Design underway in the remainder. This approach is set out in Policy Objective 10.7.2. The Cherrywood Planning Scheme is made and amended under a sperate legislative process to the County Development Plan. Development of any site that falls or partly falls with the Planning Scheme boundary is required to align with the provisions of the SDZ Planning Scheme.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>v) Submission requests that attention be given to flooding and leaking pipes on Ballybride Road.</p>	<b>B1003</b>		<p>The maintenance of watermains is a matter for Irish Water.</p> <p><b>Localised flooding issues in Ballybride Road are a matter for DLRCC Operations Section.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>vi) Submission request that the flood risk zones indicated on Map 9 are revisited, given the historical lack of flooding. Any flooding that has occurred has been due to poor river maintenance and poor drainage from previous road upgrades.</p>	<b>B1068</b>	<b>9</b>	<p>The Executive notes the issues raised. AEP flood extents and are based on the best available information at the time of publication. In some areas, the 1% AEP (or something similar) will have been experienced in the recent past, and could have happened more than once. In other areas it will not have been experienced for several generations. Where the Flood Zones are based on indicative data DLRCC will not make planning decisions based solely on indicative datasets. In such circumstances, applicants will have the opportunity to review and update the Flood Zones based on detailed local assessment (including hydraulic modelling as appropriate) which would then be taken into account as part of a planning application.</p> <p>The Flood Policies within the Draft Plan and Appendix 16 SFRA allow for applications to be assessed based on the most up to date flood data available, including the results of detailed modelling in Site Specific Flood Risk assessments. It allows for applications to be assessed in light of Flood Alleviation Schemes that are completed during the lifetime of the plan. It also allows applications adjacent to watercourses, in areas that have not been previously mapped</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>via CFRAMS or National Indicative Fluvial Mapping (NIFM), to be appropriately assessed following detailed local catchment modelling.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>vii) Submission considers that:</p> <ul style="list-style-type: none"> <li>• No extensive flooding has occurred on lands at Kiltiernan Cemetery Park and flood map 9 overestimates that risk</li> <li>• Flood info maps show no flood risk in the area.</li> <li>• Any flooding is attributed to minor bank overflow and poor maintenance and stream blockage.</li> <li>• Request that flood Map 9 be updated to reflect that flooding does not occur on the site.</li> </ul>	<b>B1061</b>	9	<p>The Executive notes the issues raised. AEP flood extents and are based on the best available information at the time of publication. In some areas, the 1% AEP (or something similar) will have been experienced in the recent past and could have happened more than once. In other areas it will not have been experienced for several generations. Where the Flood Zones are based on indicative data DLRCC will not make planning decisions based solely on indicative datasets. In such circumstances, applicants will have the opportunity to review and update the Flood Zones based on detailed local assessment (including hydraulic modelling as appropriate) which would then be taken into account as part of a planning application.</p> <p>The Flood Policies within the County Development Plan and Appendix 16 SFRA allow for applications to be assessed based on the most up to date flood data available, including the results of detailed modelling in Site Specific Flood Risk assessments. It allows for applications to be assessed in light of Flood Alleviation Schemes that are completed during the lifetime of the plan. It also allows applications adjacent to watercourses, in areas that have not been previously mapped via CFRAMS or National Indicative Fluvial Mapping (NIFM), to be appropriately assessed following detailed local catchment modelling.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>viii) Submission request that DLR set an objective to manage the flood risks identified in the recently completed hydraulic and flood risk modelling for the Dundrum Slang Integrated Catchment Study which identified a significant number of properties along the Slang stream and in the Dundrum area are at risk of flooding in 1 % and 0.1% AEP events</p> <p>An Amendment to the Draft Plan is sought that would include a specific Policy Objective to</p>	<b>B1072</b>		<p>The Executive notes the issues raised. The Flood Zones represent the predicted 1% and 0.1% AEP flood extents and are based on the best available information at the time of publication. In some areas, the 1% AEP (or something similar) will have been experienced in the recent past and could have happened more than once. In other areas it will not have been experienced for several generations. Where the Flood Zones are based on indicative data DLRCC will not make planning decisions based solely on indicative datasets. In such circumstances, applicants will have the opportunity to review and update the Flood Zones based on detailed local assessment (including hydraulic modelling as appropriate) which would then be taken into account as part of a planning application.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>encourage the OPW to advance the design and construction of flood relief measures to reduce the flood risk to old Dundrum Shopping Centre and other properties arising from capacity and other constraints on the Dundrum Slang stream.</p>			<p>The Flood Policies within the County Development Plan and Appendix 16 SFRA allow for applications to be assessed based on the most up to date flood data available, including the results of detailed modelling in Site Specific Flood Risk assessments. It allows for applications to be assessed in light of Flood Alleviation Schemes that are completed during the lifetime of the plan. It also allows applications adjacent to watercourses, in areas that have not been previously mapped via CFRAMS or National Indicative Fluvial Mapping (NIFM), to be appropriately assessed following detailed local catchment modelling.</p> <p>The Dundrum Slang has not been included in the CFRAMS program but the Council will continue to work with the OPW and seek to progress any cost beneficial flood alleviation scheme. Given that the Council are not the lead authority on the project, it is not considered that a specific Policy Objective is appropriate in relation to the flood relief measures for Dundrum. Flood risk for individual sites will be assessed via the Development Management process.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ix) Flooding occurs at Bullock Harbour due to wave over topping during bad weather conditions and the unpredictable nature of the volumes of water that can occur from overtopping is stated. Climate change has led to a significant increase in flooding and wave over-topping with accompanying health and safety risk conditions.</p>	<p><b>B0426</b></p>	<p>4</p>	<p>The Executive notes the issues raised. Flooding and Coastal Defence and their potential impacts have been considered in Appendix 16 (Flooding) and in section 10.8. (Coastal Protection).</p> <p>The SFRA has been updated to note the establishment of the Inter-Departmental Group on Coastal Change Management and to make provision for consideration, during the lifetime of the County Development Plan 2022 -2038, of any options, recommendations or policies following a Government decision.</p> <p>A Coastal risk and wave overtopping Study has been carried out in response to the issues raised in submissions and Bullock harbour is included. As set out in detail above, it is recommended that the Coastal Flooding section of Appendix 16 be updated accordingly, which includes a reappraisal of still water sea levels, building upon work undertaken in the Irish Coastal Protection Strategy Study (ICPSS), and an assessment of wave overtopping potential.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			See detailed responses and recommendations above which outlines proposed amendments which comprehensively address both climate change and the risk of flooding due to rising sea levels caused by climate change.
<p>x) The submitter notes that a large proportion of their property is designated as an Area of Flood Risk Concern - Flood Zone B on Flood Zone Map 1.</p> <p>The property has been in the ownership of the submitter's family for approximately 55 years and no part of the property has ever flooded from the River Slang.</p> <p>Understand that works were completed upstream of Dundrum Town Centre following the flooding that occurred there in late 2011 to preclude the possibility of same recurring and would presume this would also preclude the possibility of any flooding downstream of the Town Centre.</p> <p>Request that extents be reconsidered.</p>	<b>B1190</b>		<p>The Executive notes the issues raised. The Flood Zones represent the predicted 1% and 0.1% AEP flood extents and are based on the best available information at the time of publication. In some areas, the 1% AEP (or something similar) will have been experienced in the recent past and could have happened more than once. In other areas it will not have been experienced for several generations. Where the Flood Zones are based on indicative data DLRCC will not make planning decisions based solely on indicative datasets. In such circumstances, applicants will have the opportunity to review and update the Flood Zones based on detailed local assessment (including hydraulic modelling as appropriate) which would then be taken into account as part of a planning application.</p> <p>The Flood Policies within the County Development Plan and Appendix 16 SFRA allow for applications to be assessed based on the most up to date flood data available, including the results of detailed modelling in Site Specific Flood Risk assessments. It allows for applications to be assessed in light of Flood Alleviation Schemes that are completed during the lifetime of the plan. It also allows applications adjacent to watercourses, in areas that have not been previously mapped via CFRAMS or National Indicative Fluvial Mapping (NIFM), to be appropriately assessed following detailed local catchment modelling.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xi) Submission queries inclusion of the end of Corbawn Drive (adjacent to Quinn's Road) as an area subject to flooding.</p> <p>Request DLR remove this alert on the Plan as it could have serious consequences for residents obtaining house insurance or trying to sell their homes.</p>	<b>B0511</b>	10	<p>The Executive notes the issues raised. The purpose of identifying non-specific address locations is to alert potential applicants of the necessity to consult with the Local Authority as to the nature, source, and possible location(s) that may be impacted and following such consultations to factor in and mitigate against flood risk identified, if any, in a site specific flood risk assessment. As all of the locations shown on the flood maps are known to have experienced localised flooding following severe rainfall events it would be remiss of the Planning Authority to remove one or all locations. Section 3.3 has been included in Appendix 16 to provide clarification.</p> <p><b>Recommendation</b> Insert the following new section after Section 3.2 in Appendix 16:</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><b>3.3 Areas of Flood Risk Concern shown on Flood Zone Maps</b>  <u>Non-specific address locations that may be subject to localised flooding from sources other than out-of-bank river flooding have been identified in the flood maps by triangles as follows:</u></p> <ul style="list-style-type: none"> <li>• <u>“P” (green triangle) - pluvial (rainfall) foul sewage overflow</u></li> <li>• <u>“P” (blue triangle)- pluvial (rainfall) surface water overflow</u></li> <li>• <u>“F” (blue triangle)- Fluvial - (river/watercourse) surface water overflow</u></li> </ul> <p><u>The purpose of identifying these areas is to alert potential applicants of the necessity to consult with the Local Authority as to the nature, source, and possible extent(s) that may be impacted. Following such consultations a site specific flood risk assessment to factor in and mitigate against flood risk identified, if any, needs to be prepared, the details of such measures being set out in Section 6.</u></p>
<b>3.28.3: Application of the Justification Test for Development Plans</b>			
<p>i) Submission considers that the SFRA is not clear that some areas have failed the Plan Making Justification Test as the text does not stand out.</p>	<b>B0432</b>		<p>The Executive notes the issued raised by the OPW in their submission and recommends updating Appendix 16 SFRA so as to provide clarity accordingly. The Executive have consulted with the OPW.</p> <p><b>Recommendation</b>                      Replace Section 6.0 Application of the Justification Test for Development Plans, of Appendix 16 with the following text:  <u>“6.1 Core Principles</u>  <i>Having reviewed the level of flood risk within the County and determined appropriate measures for assessing and managing risks to high and low vulnerability development in Flood Zones A, B and C, a more detailed assessment of sites and areas was carried out. The aim of this assessment was to apply the Justification Test for Development Plans, taking into account circular PL02/2014 in relation to existing development.</i></p> <p><i>With the exception of the screening land-use classifications locations listed in Table 6-2 5-1, new highly vulnerable development within Flood Zones A or B, or less vulnerable development within Flood Zone A, does not pass the Justification Test for Development Plans and will not be permitted. This applies to lands which are zoned for development but are currently undeveloped and to areas of existing low intensity development.</i></p> <p><del><b>5.2 Existing developed and zoned areas at risk of flooding: All other lands</b></del></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><i>Circular PL02/2014 states that “In some instances, particularly in older parts of cities and towns, an existing land use may be categorised as a “highly vulnerable development” such as housing, be zoned for residential purposes and also be located in flood zone A/B. Additional development such as small scale infill housing, extension or changes of use that could increase the risk or number of people in the flood-prone are can be expected in such a zone into the future. In these instances, where the residential/vulnerable use zoning has been considered as part of development plan preparation, including uses of the Justification Test as appropriate, and it is considered that the existing use zoning is still appropriate, the development plan must specify the nature and design of structural or non-structural flood risk management measures prior to future development in such areas in order to ensure that flood hazard and risk to the area and to other adjoining locations will not be increased or, if practicable, will be reduced”.</i></p> <p><i>There are a number of such areas in the County identified on the Flood Zone maps. It is considered that it would be unrealistic to down zone these lands as they are <u>fully already</u> developed. Parts 1 and 2 of the Justification Test for Development Plans in relation to <u>these</u> areas of existing <del>housing</del> <u>development</u> in the County is outlined in Table 6-15-2. Whilst lands <u>outside those listed in Table 6-2</u> may have retained a zoning objective which would <del>include</del> allow consideration for development, applying the guidance in Section 45 means such development is restricted to Flood Zone C, with water compatible uses located within Zone A and B.</i></p> <p><i>In applying the Justification Test, particularly Part 3, consideration has been given to structural and non-structural measures which may be required prior to further development taking place. In most locations, future opportunities for development are likely to be limited to small extensions, infill houses or small commercial units and changes of use, as defined in Section 5. As such, in most areas flood risk can be addressed through non-structural responses, such as requiring a site-specific flood risk assessment which will identify appropriate mitigation measures such as retaining flow paths, flood resilient construction and emergency planning.</i></p> <p><i>There are a number of locations where flood risk is greater and non-structural responses are not appropriate to the scale of risks. In these locations, structural measures, generally in the form of flood defences, will be required prior to future development occurring. Further detail on the specifics of the flood management measures in these locations is available in the ECFRAM Preliminary Options Reports, and in the areas where Flood Relief Schemes are being progressed,</i></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><i>or have been shortlisted for progressing, in the coming years. <u>The policies in Section 4 and 5 will determine the types of development which will be acceptable for consideration.</u></i></p> <p><i>The following sections provide more detail on the various flood risk areas within the County and gives a details of the outcome of Part 3 of the Justification Test for Development Plans.</i></p> <p><b>6.2 Justification Test for Development Plan</b></p> <p><b><del>5.1 Existing developed and zoned areas at risk of flooding: Mix Use Lands</del></b></p> <p><i>There are a number of areas within Dún Laoghaire Rathdown County that consist of existing mixed use development and also form the core of a settlement or district centre. For the areas listed in Table 6-25-1, the requirement for application of the Justification Test for development plans has been reviewed through a screening assessment. The screening assessment has been based on the Flood Zone the area is located in, and the land use that is within Flood Zone A or B.</i></p> <p><i>Where <u>the screening has identified</u> <del>there is</del> a requirement to apply the Justification Test for plan making, this is detailed in the following sections of <u>this</u> report.</i></p> <p><i><u>For all other lands, an overview of the flood risks and implications for development has been provided on a watercourse by watercourse basis.</u></i></p> <p><i><u>The flood maps shown in the following sections are also reproduced at a larger size in Appendix A, and maps for the whole County are shown in the Mapping section of the County Development Plan.”</u></i></p> <p><i>Add the following text to the end of table row 3 of Section 6.2.6 Rathmichael, Appendix 16.</i></p> <p><i><u>“Risks to these lands can be further defined through site specific risk assessment as part of the LAP preparation, following the guidance within this SFRA, which should also consider the potential impact of climate change and how this may impact on land use in the future. In this area, the sequential approach should then be applied, with highly or less vulnerable development in Flood Zone A and B to be avoided.”</u></i></p> <p><i>Update the first paragraph of the conclusion of Section 6.2.6 Rathmichael, Appendix 16 as follows:</i></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><i><u>“The lands within Flood Zone A and B (even after more detailed assessment under the LAP) in Rathmichael do not pass the Justification Test and should be used for open space/amenity/water compatible uses.”</u></i></p> <p>Insert the following text after the second paragraph of table row 3 of Section 6.2.7 Old Connaught, Appendix 16.</p> <p><i><u>“The CFRAM Study also indicates that climate change impacts on flood extents could be significant. It is important that the LAP SFRA also reviews the likely impact of climate change, and where appropriate, incorporates measures for management of such risks, both in the plan making stage and by adopting the design recommendations contained in this County Development Plan SFRA.”</u></i></p> <p>Add the following text to the beginning of Section 6.2.8 Crinken Stream, Appendix 16:  <i><u>“At the downstream end of the Crinken Stream there is flooding to an area zoned for Economic Development and Employment (1b) which is currently carparking. Although the zoning has been retained, redevelopment of this land for less or highly vulnerable development does not pass the Plan Making Justification Test and only water compatible uses will be permitted with Flood Zone A and B. There is also flooding to the open space area associated with Woodbrook Glen residential development (1) Figure 6-15-1.”</u></i></p> <p>Add the following text to the end of Section 6.2.8 Crinken Stream, Appendix 16:  <i><u>“Although some minor development associated with the existing uses, including the school, may be permitted under Section 5.28 of the Planning Guidelines, it is important to ensure that there will be no significant additional number of people into flood risk areas, amongst the other requirements of Section 5.28.”</u></i></p> <p>Add the following text to the beginning of Appendix 16 Section 6.2.9 Deansgrange Stream:  <i><u>“The CFRAM Study extends along the Deansgrange River and included flood relief options within the POR. The Deansgrange FRS commenced in January 2020 and construction of any cost beneficial flood alleviation works is not envisaged prior to 2024.”</u></i></p> <p>Add the following text after the second paragraph of Appendix 16 Section 6.2.9 Deansgrange Stream:</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><u><i>“Within the areas of existing residential there are some undeveloped areas, including public open space which is within Flood Zones A and/or B. Although the residential zoning has been retained in this area, new highly or less vulnerable development within Flood Zone A / B has not passed the Plan Making Justification Test and will not be permitted.”</i></u></p> <p>Update the fifth paragraph of Appendix 16 Section 6.2.9 Deansgrange Stream as follows:  <u><i>“Planning permission has been <del>was granted</del> Construction has commenced for a storage scheme to increase flood storage on Kilbogget Park with a view to limiting downstream flows and manage flooding to residential development downstream of Kilbogget Park (8). The storage area is part of a suite of measures that form part of the Deansgrange Flood Relief Scheme. Until such time as the whole Deansgrange Flood Relief Scheme has been constructed, development <u>downstream of Kilbogget Park</u> <del>within this area</del> would be considered premature.”</i></u></p> <p>Add the following text after the fifth paragraph of Appendix 16 Section 6.2.9 Deansgrange Stream:  <u><i>“The CFRAM modelling outputs indicate climate change impacts, particularly at the downstream end of the catchment in the Bayview and Seafield areas, could be significant. As part of the FRS a climate change adaptation plan will be produced which will outline the process for managing flood risk into the future. This should inform future Development Plans and be an integral part of associated SFRAs.”</i></u></p> <p>Update the first sentence of the last paragraph of Appendix 16 Section 6.2.9 Deansgrange Stream as follows:  <u><i>“Whilst Parts 1 and 2 of the Justification Test for Development Plans have been passed, the CFRAM outputs indicate possible flood depths of up to 1m and therefore Part 3 cannot be passed at present. Until the scheme is complete, any development <u>in Seafield, Bayview and neighbouring residential areas</u> in Flood Zone A is not permitted and development in Flood Zone B should be limited to Minor Development as defined in Section <u>5.2.1</u> <del>4.3.1</del>.”</i></u></p> <p>Add the following text after the first paragraph of Appendix 16 Section 6.2.10 Shanganagh River:</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><u><i>“The CFRAM Study extends along the Shanganagh River and included flood relief options within the POR. The Carrickmines Shanganagh FRS commenced in August 2020 and construction of any cost beneficial flood alleviation works is not envisaged prior to 2024. As part of the FRS a climate change adaptation plan will be produced which will outline the process for managing flood risk into the future. This should inform future Development Plans and be an integral part of associated SFRA.”</i></u></p> <p>Update the first sentence of the last paragraph of Appendix 16 Section 6.2.10 Shanganagh River: as follows:  <u><i>“Within the Flood Relief Scheme study area, whilst Parts 1 and 2 of the Justification Test for Development Plans have been passed, but the CFRAM outputs indicate possible flood depths up to 2m and therefore Part 3 cannot be passed at present.”</i></u></p> <p>Replace Appendix 16 Section 6.2.12 Carrickmines River with the following text:  <u><i>“The Carrickmines River is shown in Figure 6-5 5-5. The CFRAM Study extends along the Carrickmines River and included flood relief options within the POR. The Carrickmines Shanganagh FRS has commenced in August 2020 and construction of any cost beneficial flood alleviation works is not envisaged prior to 2024. Upon completion of a Flood Relief Scheme to the 1.0% AEP event standard, proposals for all development will be considered subject to a Site Specific Flood Risk Assessment satisfying the requirements of Section 4 of this SFRA. As part of the FRS, a climate change adaptation plan will be produced which will outline the process for managing flood risk into the future. This should inform future Development Plans and be an integral part of associated SFRA.”</i></u></p> <p><u><i>As part of the Cherrywood SDZ (17) process a stage 3 FRA was carried out and included assessment of risks at the M50 and Carrickmines Luas Station (Priorsland)<sup>3</sup>. As a result, the SDZ has not been re-reviewed under this SFRA. However, it is noted that under the CFRAM mapping outputs, a significant increase in flood extents is shown between the current and MRFS scenarios.</i></u></p>

<sup>3</sup> “Flood Risk Assessment and management Study at Priorsland, Carrickmines”.

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><i>It should be noted that the north-west<del>east</del> quadrant of the Carrickmines Shopping Centre (18) is subject to extreme depths of flooding and development within Flood Zone A and B does not pass the Justification Test for plan making and is not permitted.</i></p> <p><i><del>Flood Zone A and B are within land zoned for open spaces uses and this must be retained as water compatible uses</del> In Ballyogan Business Park (19), new development within Flood Zone A cannot be justified and less vulnerable development in Flood Zone B needs a detailed SSFRA. Minor development, as defined in Section 5.2.1 <del>4.3.1</del>, is permissible, subject to appropriate SSFRA. <u>Examination of climate change impacts, produced through the CFRAM Study, show a significant increase in the extent of Flood Zone A in the future, having a similar coverage to the current Flood Zone B. However, as this area forms part of the Carrickmines Shanqanagh FRS the adaptation plan for the scheme should provide guidance on climate change management here. It is important that climate change is fully considered in any site specific flood risk assessments carried out.</u></i></p> <p><i>Towards the upstream end of the Carrickmines River is an area of existing residential development (20). Flood risk in this area is indicated to be high, with many properties in Flood Zone A.</i></p> <p><i><del>A flood relief scheme is now proposed, with works on the design of the scheme due to commence in mid 2020. Future Development within the Flood Relief Scheme study in this area which is also in Flood Zone A shall be limited to Minor Development, as defined in Section 5.2.1 <del>4.3.1</del>. Infill or other new development will be considered premature until the FRS is constructed. When the FRS has been completed, development may be considered subject to analysis of residual risk but this would require application of the Plan Making Justification Test and is allowed for in the SFRA Review and Monitoring triggers laid out in Section 7. Both the SFRA and site specific FRAs will need to take into account climate change impacts.</del></i></p> <p><i>Add the following text to the end of the first paragraph of Appendix 16 Section 6.2.13 Carysfort Maretimo:</i>  <i><u>“Funding for a flood relief scheme for the Carysfort Maretimo, and including the Crinken Stream, has been secured, but the scheme will be in the second round (following Carrickmines and Deansgrange), so timelines for these works are unknown at this stage. As part of the FRS a climate change adaptation plan will be produced which will outline the process for managing</u></i></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p><i><u>flood risk into the future. This should inform future Development Plans and be an integral part of associated SFRAs.</u></i></p> <p>Add the following text to the end of the second paragraph of Appendix 16 Section 6.2.13 Carysfort Maretime:  <i><u>"Under the MRFS climate change scenario in the CFRAM Study, there is some increase in flood extents predicted in the future. It is important that this is assessed and suitable mitigation measures provided within any site specific flood risk assessments."</u></i></p>
<p>ii) Submission considers that the Council should liaise with the gym owners in Dundrum to put in place an emergency plan</p>	<p><b><u>B0432</u></b></p>		<p>The Executive notes the issue raised.</p> <p><b>The provision of an emergency plan for commercial premises in an area at risk of flooding falls outside the remit of the Local Authority.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) <b>Old Connaught</b></p> <ul style="list-style-type: none"> <li>● Submission recommends that consideration be given to rezoning undeveloped land in flood zone A and B from objective A1 to a water compatible rezoning or to attaching Policy Objectives to zonings so that the sequential approach is applied.</li> <li>● The A1 zoning overlaps with the potential future scenarios flood extent maps prepared under the National CFRAM programme.</li> <li>● Climate adaptation objectives should be considered for this site.</li> </ul>	<p><b><u>B0432</u></b></p>		<p>The Executive notes the issues raised by the OPW in their submission. The Executive have consulted with the OPW in formulating the response to these issues.</p> <p>It is considered that lands should not be zoned based solely on current flood extents as this will exclude these lands from anything other than water compatible development for the lifetime of the Plan. The Flood Policies within the Written Statement and Appendix 16 SFRA allow for applications to be assessed based on the most up to date flood data available, including the results of detailed modelling in Site Specific Flood Risk assessments. It allows for applications to be assessed in light of Flood Alleviation Schemes that are completed during the lifetime of the plan. It also allows applications adjacent to watercourses, in areas that have not been previously mapped via CFRAMS or National Indicative Fluvial Mapping (NIFM), to be appropriately assessed following detailed local catchment modelling. The future Lap will also include a Flood Risk Assessment.</p> <p><b>Recommendation</b> Insert the following text after the second paragraph of table row 3 of Section 6.2.7 Old Connaught, Appendix 16.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><i>“The CFRAM Study also indicates that climate change impacts on flood extents could be significant. It is important that the LAP SFRA also reviews the likely impact of climate change, and where appropriate, incorporates measures for management of such risks, both in the plan making stage and by adopting the design recommendations contained in this County Development Plan SFRA.”</i></p>
<p>iv) Submission considers that development will not meet density levels required in the Draft County Development Plan to justify building in flood zones. For example in order to build in Flood Zone A and B, a min of 50uph (and up to possibly 80) would have to be developed to satisfy the Justification Test. If DLRCOCO were to develop a hectare of A1 land (Flood Zone A and B), with 9 units instead of 50-80 units this would not satisfy the Justification Test as the criteria outlined in the RSES and RPG have not been satisfied. DLRCOCO would not be able to go ahead with the development of land at the much reduced density (specific reference made to Old Connaught)</p>	<p><b>B1016</b></p>	<p>14</p>	<p>The Executive notes the issues raised but would not concur with the contention that where sites have passed the justification test the density of development would not meet the County plan standards. Within the lifetime of the current plan a number of permissions have been granted for development at appropriate densities in areas that passed the justification test (SUFPA area).</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>v) <b>Crinken Stream</b> Submission queries whether development is proposed in at risk locations.</p>	<p><b>B0432</b></p>		<p>The Executive notes the issues raised by the OPW in their submission. The Executive have consulted with the OPW in formulating the response to the issue raised and are proposing an amendment to the SFRA.</p> <p>It is considered that lands should not be zoned based solely on current flood extents as this will exclude these lands from anything other than water compatible development for the lifetime of the Plan. The Flood Policies within the Written Statement and Appendix 16 SFRA allow for applications to be assessed based on the most up to date flood data available, including the results of detailed modelling in Site Specific Flood Risk assessments. It allows for applications to be assessed in light of Flood Alleviation Schemes that are completed during the lifetime of the plan. It also allows applications adjacent to watercourses, in areas that have not been previously mapped via CFRAMS or National Indicative Fluvial Mapping (NIFM), to be appropriately assessed following detailed local catchment modelling.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>Add the following text to the beginning of Section 6.2.8 Crinken Stream, Appendix 16:  <i>“At the downstream end of the Crinken Stream there is flooding to an area zoned for Economic Development and Employment (1b) which is currently carparking. Although the zoning has been retained, redevelopment of this land for less or highly vulnerable development does not pass the Plan Making Justification Test and only water compatible uses will be permitted with Flood Zone A and B. There is also flooding to the open space area associated with Woodbrook Glen residential development (1) Figure 6-1 5-4.”</i></p> <p>Add the following text to the end of Section 6.2.8 Crinken Stream, Appendix 16:  <i>“Although some minor development associated with the existing uses, including the school, may be permitted under Section 5.28 of the Planning Guidelines, it is important to ensure that there will be no significant additional number of people into flood risk areas, amongst the other requirements of Section 5.28.”</i></p>
<p>vi) In relation to the Shanganagh River, Dundrum Slang, Deansgrange Stream, Rathmichael, submission suggests attaching objectives to address:</p> <ul style="list-style-type: none"> <li>• areas at risk of flooding.</li> <li>• zoning of areas that have not passed the Plan Making Justification test.</li> <li>• at-risk locations zoned as “existing residential”.</li> </ul>	<p><b>B0432</b></p>		<p>The Executive notes the issues raised by the OPW in their submission in relation to lands including those zoned for residential development that have been identified as being at risk of flooding and lands that have not passed the justification test. The Executive have consulted with the OPW in formulating the response to these issues and are recommending amendments.</p> <p>It is considered that lands should not be zoned based solely on current flood extents as this will exclude these lands from anything other than water compatible development for the lifetime of the Plan. The Flood Policies within the Written Statement and Appendix 16 SFRA allow for applications to be assessed based on the most up to date flood data available, including the results of detailed modelling in Site Specific Flood Risk assessments. It allows for applications to be assessed in light of Flood Alleviation Schemes that are completed during the lifetime of the plan. It also allows applications adjacent to watercourses, in areas that have not been previously mapped via CFRAMS or National Indicative Fluvial Mapping (NIFM), to be appropriately assessed following detailed local catchment modelling.</p> <p><b>Recommendation</b>  Add the following text to the end of table row 3 of Section 6.2.6 Rathmichael, Appendix 16.  <i>“Risks to these lands can be further defined through site specific risk assessment as part of the LAP preparation, following the guidance within this SFRA, which should also consider the</i></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><u>potential impact of climate change and how this may impact on land use in the future. In this area, the sequential approach should then be applied, with highly or less vulnerable development in Flood Zone A and B to be avoided.</u></p> <p>Add the following text after the second paragraph of Appendix 16 Section 6.2.9 Deansgrange Stream:</p> <p><u>“Within the areas of existing residential there are some undeveloped areas, including public open space which is within Flood Zones A and/or B. Although the residential zoning has been retained in this area, new highly or less vulnerable development within Flood Zone A / B has not passed the Plan Making Justification Test and will not be permitted.”</u></p> <p>Update the fifth paragraph of Appendix 16 Section 6.2.9 Deansgrange Stream as follows:  <del>“Planning permission has been <u>was granted</u> Construction has commenced for a storage scheme to increase flood storage on Kilbogget Park with a view to limiting downstream flows and manage flooding to residential development downstream of Kilbogget Park (8). The storage area is part of a suite of measures that form part of the Deansgrange Flood Relief Scheme. Until such time as the whole Deansgrange Flood Relief Scheme has been constructed, development <u>downstream of Kilbogget Park</u> <del>within this area</del> would be considered premature.”</del></p> <p>Add the following text after the fifth paragraph of Appendix 16 Section 6.2.9 Deansgrange Stream:</p> <p><u>“The CFRAM modelling outputs indicate climate change impacts, particularly at the downstream end of the catchment in the Bayview and Seafield areas, could be significant. As part of the Flood Relief Scheme(FRS) a climate change adaptation plan will be produced which will outline the process for managing flood risk into the future. This should inform future Development Plans and be an integral part of associated SFRAs.”</u></p> <p>Update the first sentence of the last paragraph of Appendix 16 Section 6.2.9 Deansgrange Stream as follows:</p> <p><u>“Whilst Parts 1 and 2 of the Justification Test for Development Plans have been passed, the CFRAM outputs indicate possible flood depths of up to 1m and therefore Part 3 cannot be passed at present. Until the scheme is complete, any development <u>in Seafield, Bayview and neighbouring residential areas</u> in Flood Zone A is not permitted and development in Flood Zone</u></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><i>B should be limited to Minor Development as defined in Section 5.2.1 4.3.1.”</i></p> <p>Add the following text after the first paragraph of Appendix 16 Section 6.2.10 Shanganagh River:</p> <p><i>“The CFRAM Study extends along the Shanganagh River and included flood relief options within the POR. The Carrickmines Shanganagh FRS commenced in August 2020 and construction of any cost beneficial flood alleviation works is not envisaged prior to 2024. As part of the FRS a climate change adaptation plan will be produced which will outline the process for managing flood risk into the future. This should inform future Development Plans and be an integral part of associated SFRA.”</i></p> <p>Update the first sentence of the last paragraph of Appendix 16 Section 6.2.10 Shanganagh River: as follows:</p> <p><i>“Within the Flood Relief Scheme study area, whilst Parts 1 and 2 of the Justification Test for Development Plans have been passed, but the CFRAM outputs indicate possible flood depths up to 2m and therefore Part 3 cannot be passed at present.”</i></p>
<p>vii) <b>Carrickmines</b></p> <ul style="list-style-type: none"> <li>• Submission includes comments on Cherrywood area.</li> <li>• Submission suggest attaching objectives to address issue of areas at risk of flooding at Carrickmines</li> <li>• Submission recommends that residual flood risk needs to be considered</li> <li>• The A1 zoning overlaps with the potential future scenarios flood extent maps prepared under the National CFRAM programme. Climate adaptation objectives should be considered for these areas.</li> </ul>	<p><b>B0432</b></p>		<p>The Executive notes the issues raised.</p> <p>Amendments are proposed to address the Carrickmines River. The Cherrywood Planning Scheme is made and amended under a sperate legislative process to the County Development Plan.</p> <p><b>Recommendation</b></p> <p>Replace Appendix 16 Section 6.2.12 Carrickmines River with the following text:</p> <p><i>“The Carrickmines River is shown in Figure 6-5 5-5. The CFRAM Study extends along the Carrickmines River and included flood relief options within the POR. The Carrickmines Shanganagh FRS <del>has</del> commenced in August 2020 and construction of any cost beneficial flood alleviation works is not envisaged prior to 2024. Upon completion of a Flood Relief Scheme to the 1.0% AEP event standard, proposals for all development will be considered subject to a Site Specific Flood Risk Assessment satisfying the requirements of Section 4 of this SFRA. As part of the FRS, a climate change adaptation plan will be produced which will outline</i></p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p><u><i>the process for managing flood risk into the future. This should inform future Development Plans and be an integral part of associated SFRA.</i></u></p> <p><i>As part of the Cherrywood SDZ (17) process a stage 3 FRA was carried out and included assessment of risks at the M50 and Carrickmines Luas Station (Priorsland)<sup>4</sup>. As a result, the SDZ has not been re-reviewed under this SFRA. However, it is noted that under the CFRAM mapping outputs, a significant increase in flood extents is shown between the current and MRFS scenarios.</i></p> <p><i>It should be noted that the north-west-east quadrant of the Carrickmines Shopping Centre (18) is subject to extreme depths of flooding and development within Flood Zone A and B does not pass the Justification Test for plan making and is not permitted.</i></p> <p><u><i>Flood Zone A and B are within land zoned for open spaces uses and this must be retained as water compatible uses In Ballyogan Business Park (19), new development within Flood Zone A cannot be justified and less vulnerable development in Flood Zone B needs a detailed SSFRA. Minor development, as defined in Section 5.2.1 4.3.1, is permissible, subject to appropriate SSFRA. Examination of climate change impacts, produced through the CFRAM Study, show a significant increase in the extent of Flood Zone A in the future, having a similar coverage to the current Flood Zone B. However, as this area forms part of the Carrickmines Shanganagh FRS the adaptation plan for the scheme should provide guidance on climate change management here. It is important that climate change is fully considered in any site specific flood risk assessments carried out.</i></u></p> <p><i>Towards the upstream end of the Carrickmines River is an area of existing residential development (20). Flood risk in this area is indicated to be high, with many properties in Flood Zone A.</i></p> <p><u><i>A flood relief scheme is now proposed, with works on the design of the scheme due to commence in mid-2020. Future Development within the Flood Relief Scheme study in this area which is also in Flood Zone A shall be limited to Minor Development, as defined in Section 5.2.1 4.3.1. Infill or other new development will be considered premature until the FRS is constructed. When the FRS has been completed, development may be considered subject to analysis of residual risk but this would require application of the Plan Making</i></u></p>

<sup>4</sup> “Flood Risk Assessment and management Study at Priorsland, Carrickmines”.

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<i>Justification Test and is allowed for in the SFRA Review and Monitoring triggers laid out in Section 7. Both the SFRA and site specific FRAs will need to take into account climate change impacts.”</i>
<p>viii) <b>River Dodder</b>                      Submission raises a query in relation to the flood map extents in the SFRA, the flood maps (map 1) and National CFRAM maps.</p>	<p><b><u>B0432</u></b></p>		<p>The Executive notes the issue raised. This query relates to flood extents shown through the Golf Course on Figure 6 – 8 (Dodder). These flood extents are taken from the Whitechurch study undertaken by South Dublin County Council and at the time of publishing the Draft Plan were not yet available on floodinfo.ie which is why their inclusion was queried by the OPW. For completeness it is considered that they should be included. It is also a small section of mapping which is an expert interpretation of Preliminary Flood Risk Assessment (PFRA) and JBA's Catchment Flood Mapping (CFM) mapping. The Whitechurch stream study is referenced in the data collection table.</p> <p><b>Recommendation</b>                      No change to Draft Plan.</p>



**3.29: Appendix 17 - Sandyford Urban Framework Plan (see also section 3.20 Appendix 5: Building Height Strategy)**

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<b>3.29.1: General</b>			
i) Submissions is in agreement that Sandyford had been developed in a piecemeal fashion prior to adoption of the Urban Framework Plan.	<u><b>B0587</b></u>		The Executive notes the issue raised. The SUFP was proposed to address this issue. It can however take a number of Plan cycles to realise the objectives of any Plan.  <b>Recommendation</b> No change to Draft Plan.
ii) Considers that a comprehensive review of the SUFP is required (Issue is raised in the context of Height)  Consider that dlr should encourage and facilitate more development in the SBD.  SUFP has not changed much since 2011. New plan should provide more scope to react to the changing circumstances in coming years	<u><b>B0999</b></u> <u><b>B0919</b></u>		The Executive notes the issue raised.  The Draft SUFP sets out comprehensive policy to encourage and facilitate compact, brownfield development and regeneration very much aligned with current national policy which favours brownfield development, regeneration and compact growth. The original SUFP was prepared using detailed analysis of the existing situation in the Sandyford Business District outlining the scale and mix of development permitted and the potential for infrastructure capacities – to be increased – to provide for future plan-led growth. Planned infrastructure provision has not significantly altered since 2011. The Draft SUFP has been reviewed and updated to take on board both changing policy and circumstances.  <b>Recommendation</b> No change to Draft Plan.
iii) Multiple shades of blue (residential density) on Map 2 make it difficult to read.	<u><b>B0823</b></u>		The Executive notes the issues raised.  <b>Recommendation</b> Amend Map 2 of Appendix 17 Draft SUFP to provide more distinction between colours.
iv) Submission considers that Sandyford Business Park (formerly Sandyford Industrial Estate) and Stillorgan Business Park (formerly Stillorgan Industrial Estate) are incorrectly referenced in the Draft County Development Plan 2022-2028	<u><b>B0919</b></u>		The Executive notes the issues raised.  <b>Recommendation</b> Amend SUFP as follows; Page 2: section 1.5 – from “ <i>Stillorgan Business Estate&amp; Sandyford Business Estate</i> ” to “ <i>Sandyford Business Estate-Park and Stillorgan Business Estate Park</i> ” Page 4: Drawing No 1 - from <i>Stillorgan Business Estate&amp; Sandyford Business Estate</i> to <i>Sandyford Business Park and Stillorgan Business Park</i>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>Page 5: (a) in heading and first line – from Stillorgan Business Estate to Stillorgan Business Park                      Page 5: (b) in heading and first line – from Sandyford Business Estate to Sandyford Business Park                      Page 10: first paragraph on 4th, 5th&amp; 6th lines – - from Stillorgan Business Estate&amp; Sandyford Business Estate to Sandyford Business Park and Stillorgan Business Park                      Page 12: 2.3.4 first paragraph on 2nd line – from Stillorgan Industrial Estate to Stillorgan Business Park                      Page 24: PR7 on 2nd line – from Sandyford Business Estate to Sandyford Business Park                      Page 33: TAM3 on 4th line – from Sandyford Business Estate to Sandyford Business Park                      Page 34: TAM5 on 5th bullet point – from Sandyford Business Estate to Sandyford Business Park                      Page 40: P4 on 1st line – from Sandyford Business Estate to Sandyford Business Park                      Page 46: SLO 51 – from Stillorgan Industrial Estate to Stillorgan Business Park                      Drawing No. 1: from Stillorgan Business Estate&amp; Sandyford Business Estate to Sandyford Business Park and Stillorgan Business Park                      Drawing No. 6: from Stillorgan Business Estate to Stillorgan Business Park                      Drawing No. 7: from Stillorgan Business Estate&amp; Sandyford Business Estate to Sandyford Business Park and Stillorgan Business Park                      Drawing No. 8: from Stillorgan Business Estate to Stillorgan Business Park                      Drawing No. 9: from Stillorgan Business Estate to Stillorgan Business Park</p>
<p>v) Add a Specific Policy Objective recognising and facilitating the Smart Sandyford programme in respect of new emerging technology solutions to address SBDs requirements</p>	<p><b><u>B0919</u></b></p>		<p>The Executive notes the issues raised. Chapter 6 of the Draft Plan contains a new Policy Objective relating to Smart Dublin.</p> <p><i>“6.4.2.8 Policy Objective E9: Smart Dublin It is a Policy Objective to support the Smart Dublin Initiative which will allow greater flexibility for the County to work with Universities, citizens, entrepreneurs and companies, to co-innovate, test and deploy new urban solutions”.</i></p> <p>Smart Sandyford is specifically referenced as follows;</p> <p><i>“The Smart Sandyford goal is to use technology to overcome some of the challenges facing the local community including: improving the flow of people, bicycles and vehicles into and around the District; building a sense of community and local identity; and, strengthening Sandyford’s competitiveness and attractiveness as a place to do business. The Council recognises the</i></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p><i>potential societal benefits that can be attained through technological advancements and will continue to support the Smart Dublin initiative”.</i></p> <p>It is considered that this should be also referenced in the Draft SUIP.</p> <p><b>Recommendation</b>  Insert new section in SUIP page 39 as follows  4.3.5 Policy SUIP 12 Smart Sandyford  <i>It is an objective of the Council to support the Smart Sandyford programme which aims to improve smart systems and attempts to integrate technology within the district.</i></p>
<b>3.29.2: Residential Development</b>			
<p>i) Site on Corrig Avenue which is zoned A2, is located on brownfield lands where it is unlikely that older people will choose to downsize to. Instead the location should be targeted at ‘young professionals’ who work in the SUIP area.</p>	<b><u>B0596</u></b>	6	<p>The Executive notes the issues raised.</p> <p>In terms of creating sustainable communities and diverse neighbourhoods, policy in the Draft Development Plan on residential development in the SUIP encourages homes for all.</p> <p><b>Recommendation</b>  No change to Draft Plan.</p>
<p>ii) Whilst the SUIP district is evolving to a premier suburban office / employment location, the development of a meaningful quantum of residential accommodation for the area's expanding working population has not materialised.</p> <p>The area around Sandyford has potential to incorporate more residential, given the brownfield land bank in the Sandyford Business Park and Central Park areas.</p> <p>The argument is put forward that the working population of the district is likely to grow to 48,500 employees by the end of the draft Sandyford Urban Framework Plan (i.e. 2028), whereas the residential population only has capacity to grow to almost 12,000. This is based on the maximum capacity for</p>	<b><u>B0062</u></b> <b><u>B0843</u></b> <b><u>B0954</u></b> <b><u>B0959</u></b> <b><u>B1028</u></b>		<p>The Chief Executive notes the issues raised and would concur that the SUIP area has the potential for sustainable brownfield residential development, and also needs to be mindful of the role of the area as a strategic employment location. This needs to be Plan led.</p> <p>The Chief Executive would not agree with the issue raised that a meaningful quantum of residential accommodation for the area's expanding working population has not materialised. There are currently circa 2000 completed residential units in the SUIP area (June 2021) with permissions in place for a further 1000 new homes and circa 800 student units. There is potential for a further residential component on the Zone 5 (A2 land use zoning objective) lands.</p> <p>To look at the SUIP area alone in terms of quantum of residential units also fails to acknowledge that the area is surrounded by predominantly residential neighbourhoods such as Ballyogan, Stepside, Stillorgan, Kilmacud, Foxrock where employees also reside and commute by sustainable means to the district for employment purposes.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
the residential zoned lands which have potential to deliver a potential 2,582 units. It is considered that permitted schemes won't be delivered and as a result the area could lose its competitive edge.			No change to Draft Plan.
iii) Capping of residential population is contrary to NPF which seeks to provide additional population close to high quality public transport. Requests removal of cap as it contravenes RSES which specifically identifies SUFP area as an area to be targeted for re intensification.	<b><u>B0897</u></b>		<p>The Executive notes the issues raised.</p> <p>The lands in the SUFP are located on the Metrolink/Luas Green Link strategic development corridor as identified in the MASP which is contained in the RSES. The RSES critically also identifies the SUFP area as a strategic employment location accessible by public transport. The focus is therefore on reuse and regeneration of brownfield sites for residential development in the A2 residential lands for the 6 year duration of the 2022 – 2028 County Development Plan.</p> <p>Section 6.4.2.7 policy Objective E8 of the Draft Plan recognises this role and the opportunity for additional high intensity employment. The Planning Authority consider that sufficient residential development has been permitted in the MOC and MIC areas combined and wishes to ensure a sustainable mix of uses in the overall area. This is in accordance with national policy. Residential development can still take place in the SUFP area in a plan led manner.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
iv) The provisions of the 'Design Standards for New Apartments' Guidelines 2020 should be acknowledged by the Sandyford Urban Framework Plan. The Draft SUFP places a serious restriction on the potential residential yield of the subject lands on Corrig Avenue, which meet the criteria as a 'central and/ or accessible urban location' and therefore can accommodate higher density apartment development.	<b><u>B0596</u></b>		<p>The Chief Executive notes the issues raised.</p> <p>The subject site is subject to the A2 land use zoning objective <i>"To provide for the creation of sustainable residential neighbourhoods and preserve and protect residential amenity"</i> with a density standard of 70 units per hectare which accords with national guidance.</p> <p>The SUFP was prepared using detailed analysis of the existing situation in Sandyford Business District outlining the scale and mix of development permitted and the potential for infrastructure capacities – to be increased – to provide for future plan-led growth. The Plan includes a range of densities, plot ratios and heights etc as to allow every site to build to maximum density, plot ratio and height would result in un coordinated piecemeal development. The range of densities set in the Plan all accord with Section 28 guidelines.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>All growth in the SUFP area is compact, brownfield regeneration and accords with national policy including having regard to the apartment guidelines. Permitted residential schemes in the area have some of the highest densities for large schemes in the County and are comparable with city centre locations.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>v) Need more affordable and social housing in the SUFP area to allow staff to live and work in the same area without the need for long commutes.</p>	<p><b>B0819</b></p>	<p>6</p>	<p>The Chief Executive notes the issues raised.</p> <p>Any permitted residential schemes in the area include social housing in accordance with Part V of the Planning and Development Act</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p><b>3.29.3: Density, Plot Ratio and Height (See also section 3.20. Appendix 5 Building Height Strategy</b></p>			
<p>i) Submissions request the following:</p> <ul style="list-style-type: none"> <li>• Removal of the residential density limits set out in Map 2 of the Draft Sandyford Urban Framework Plan.</li> <li>• Omit BH1 SUFP and BH4 SUFP and Amend Maps 2 and 3 of the SUFP to provide for increased building height and density on the site;</li> <li>• Height and Density should be left to Development Management as SUFP overly constrains development and does not allow for the efficiency of the accessible zoned lands to be maximized.</li> <li>• Height should be determined on foot of multiple multi-disciplinary assessments as opposed the imposition of a blanket height limit prior to any such assessments taking place.</li> </ul>	<p><b>B0596</b> <b>B0823</b> <b>B0843</b> <b>B0878</b> <b>B0919</b> <b>B0933</b> <b>B0933</b> <b>B1004</b> <b>B1028</b> <b>B1103</b> <b>B1143</b> <b>B1144</b></p>		<p>The Chief Executive notes the issues raised.</p> <p>A range of submissions have been received many relating to individual sites within the SUFP area, each arguing that due to government policy, their site is imminently suitable for higher density, increased heights, increased plot ratio. In simple terms if every site in the SUFP was allowed to develop to unrestricted density, plot ratio and height the result would be uncoordinated, piecemeal and unplanned development and the infrastructure both physical and social would simply not be there to accommodate the growth. This was the situation that existed prior to the preparation of the variation to the 2010 Plan and was the rationale for preparing the SUFP which linked the scale of development permissible to the carrying capacity of infrastructure and the delivery of same.</p> <p>The SUFP was prepared using detailed analysis of the existing situation in Sandyford Business District outlining the scale and mix of development permitted and the potential for infrastructure capacities – to be increased – to provide for future plan-led growth. In this regard, standards including plot ratio and density are not only inextricably linked to the future development potential of Sandyford and its built form, but also the ability of the existing and proposed infrastructure in Sandyford to accommodate these developments. All residential</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<ul style="list-style-type: none"> <li>• Use of density and plot ratio in the SUFP places a serious restriction on the potential residential yield of lands.</li> <li>• Building Height restrictions as set out in the SUFP are contrary to National policy.</li> <li>• Requests that numerical limitations on building height and density should be omitted from the draft SUFP Maps 2 and 3</li> <li>• Density and heights are too restrictive.</li> <li>• Considers that the density proposed in the central Zone 5 at under 100 units to the Hectare is far too low as is the height at only 3-5 stories and therefore too restrictive to facilitate a successful residential development in this location.</li> <li>• Policy BH5 in the draft SUFP are welcomed.</li> <li>• Omit map 3 on Building height.</li> </ul>			<p>densities set out on Map 2 of the Draft SUFP are consistent with national policy with a density range from 55 units per hectare to 175 units per hectare.</p> <p>All growth in the SUFP area is compact, brownfield regeneration and accords with national policy. Indeed, permitted residential schemes in the area have some of the highest densities for large schemes in the County.</p> <p>To start omitting, amending or adjusting plan led standards and maps would be detrimental to the plan-led sustainable growth and to the carrying capacity of infrastructure of the SUFP area and its future form.</p> <p>Policy Objective BHS 2 of Appendix 5 Building Heights Strategy and Policy Objective BH5 of the Draft SUFP allows additional height to be considered subject to assessment against the performance-based criteria set out in table 5.1of Appendix 5.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>ii) Submissions request the following:</p> <ul style="list-style-type: none"> <li>• Request the SUFP substantially increase the permitted height, density, and site coverage in Zone 5 as an incentive for land owners to consider residential alternatives</li> <li>• The new central neighbourhood (ZONE 5) proposed at 3 to 5 storeys high, is too limited.</li> <li>• If a series of tall buildings is permitted in Zone 5 several could be planned together to provide a larger useable open space.</li> </ul>	<p><b><u>B0919</u></b> <b><u>B0954</u></b> <b><u>B0959</u></b></p>		<p>The Chief Executive notes the issues raised.</p> <p>The SUFP was prepared using detailed analysis of the existing situation in Sandyford Business District outlining the scale and mix of development permitted and the potential for infrastructure capacities – to be increased – to provide for future plan-led growth. In this regard, these standards are not only inextricably linked to the future development potential of Sandyford but also the ability of the existing and proposed infrastructure in Sandyford to accommodate these developments. All residential densities and plot ratios set out on Map 2 of the Draft SUFP for Zone 5 are consistent with national policy.</p> <p>To start amending or adjusting plan led standards would be detrimental to the plan-led sustainable growth and to the carrying capacity of infrastructure of the SUFP area.</p> <p>Policy Objective BHS 2 of Appendix 5 Building Heights Strategy and Policy Objective BH5 of the Draft SUFP allow additional height to be considered subject to assessment against the performance-based criteria set out in table 5.1of Appendix 5.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>The proposed Civic Park which will provide a larger usable space is located adjacent to Zone 5.. Proposals for residential development in Zone 5 will be required to meet development plan standards in terms of provisions of open space – public, communal and private. Any opportunities for provision of a coordinated space between two sites could be explored at pre planning via the development management process.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>iii) Submission consider that the FAAQ site is suited to a landmark building and that maintaining the baseline of 5 – 6 storeys , is contrary to the Building Heights Guidelines. Modelling is submitted to support the argument for increased height.</p> <p>Request that the contradiction between policies BH3 SUFP and BH4 SUFP be clarified. BHS SUFP 3 refers to star symbols and BH4 SUFP refers to triangle symbols on Map 3 and it is noted that Map 3 has no triangle symbols, rather a number of red star symbols. Support BH3 SUFP if the star symbol applies to the FAAQ site. If there is a drawing error and the symbol is intended to be a triangle as per Policy BH4 SUFP it is requested that the wording of that policy be elaborated so that additional height may be permitted subject to Policy BH5 SUFP.</p>	<b><u>B1073</u></b>	6	<p>The Chief Executive notes the issue raised.</p> <p>BH5 of the Draft SUFP states as follows; <i>“BH5 SUFP Additional height may be permitted where it can be demonstrated that additional height over the height limits identified on Map 3 accords with Policy Objective BHS1 and BHS2, of the Dún Laoghaire-Rathdown County Development Plan 2022-2028, Appendix 5 subject to complying with the safeguards outlined in these policies as set out in Table 5.1 of the BH Strategy and any other development limits/phasing set out in the SUFP. Any application for increased height or taller buildings over and above the parameters set out in Map 3 shall be subject to assessment under Policy Objective BHS1 and BHS2 of the County Development Plan”.</i></p> <p>This Policy Objective allows an applicant put forward a case for increased height which can be assessed in accordance with the performance based criteria set out in table 5.1 of Appendix 5. Proposals are however required to accord with the Plot Ratios set out in map 2.</p> <p>The red star symbols on map 3 should be triangle symbols here buildings of notable design may be permitted as set out in Policy BH4 SUFP. HB5 SUFP covers allow an argument to be put forward for additional height over the height limits on Map 3 so therefore an amendment to BH4 is not required.</p> <p><b>Recommendation</b> <b>Amend red star symbols on map 3 to triangle symbols</b></p>
<p>iv) Submissions put forward various requests for changes to plot ratio, density and height in the SUPF area on the following individual sites:</p>	<b><u>B0878</u></b> <b><u>B0933</u></b> <b><u>B0959</u></b> <b><u>B1028</u></b>	6	<p>The Chief Executive notes the issues raised.</p> <p>A range of submissions have been received many relating to individual sites within the SUPF area, each arguing that due to government policy, their site is imminently suitable for higher</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<ul style="list-style-type: none"> <li>• Site bounded by Blackthorn Road to the north, Heather Road to the west and Fern Road and industrial/commercial buildings to the south and east</li> <li>• Whelan House &amp; Accenture House at South County Business Park</li> <li>• Lands at Carmanhall road and Raven’s Rock Road</li> <li>• Former Siemens site located at Blackthorn Avenue and Ballymoss Road (request 8 – 17 storeys).</li> <li>• Site, known as Via Verde, bounded by Blackthorn Avenue, Blackthorn Road and Burton Hall Road.</li> <li>• Febrve site at Highfield House, Burton Hall Road (request tall building instead of 6 stories to develop a cluster of tall buildings).</li> <li>• Request increase of plot ratios on the Legionaries of Christ site from 1:0.5 to 1:2</li> </ul>	<p><b>B1103</b> <b>B1143</b> <b>B1144</b> <b>B1244</b></p>		<p>density, increased heights, increased plot ratio. In simple terms if every site in the SUFP was allowed to develop to unrestricted density, plot ratio and height the result would be uncoordinated, piecemeal and unplanned growth and the infrastructure both physical and social would simply not be there to accommodate the growth. This was the situation that existed prior to the inclusion of the Urban Framework Plan for Sandyford.</p> <p>Notwithstanding the comments above, national policy and SPPR3 of the Height Guidelines does allow arguments to be put forward for increased height.</p> <p>BH5 of the Draft SUFP states as follows;</p> <p><i>“BH5 SUFP Additional height may be permitted where it can be demonstrated that additional height over the height limits identified on Map 3 accords with Policy Objective BHS1 and BHS2, of the Dún Laoghaire-Rathdown County Development Plan 2022-2028, Appendix 5 subject to complying with the safeguards outlined in these policies as set out in Table 5.1 of the BH Strategy and any other development limits/phasing set out in the SUFP. Any application for increased height or taller buildings over and above the parameters set out in Map 3 shall be subject to assessment under Policy Objective BHS1 and BHS2 of the County Development Plan”.</i></p> <p>This Policy Objective allows an applicant put forward a case for increased height which can be assessed in accordance with the performance based criteria set out in table 5.1 of Appendix 5. Proposals are however required to accord with the Plot Ratios set out in map 2.</p> <p>Changing the plot ratios for the Legionaries Christ site from 1:0.5 to 1:2 would allow significantly more development on the site than would currently be allowed on a substantial site (A multiple of 4 times what would be currently allowed). This would be a significant unplanned uplift (circa 20%) in the quantum of employment floor space allowed in the SUFP area. Within the SUFP area plot ratios range from 1:0.5 to 1:4 with the higher plot ratios which allow more floor area located closer to the Luas track and in the MIC and MOC mixed use zonings and on well networked sites.</p> <p>The Executive would have serious concerns with increasing the plot ratio on the Legionaries site having regard to the specifics of the Legionaries site particularly given the location of the</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>site in close proximity to Junction 14 of the M50 where the TII and OPR have concerns over junction capacity.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<b>3.29.4: Infrastructure</b>			
<p>i) Submissions regarding P6:</p> <ul style="list-style-type: none"> <li>• Link road between Bracken Road and the Drumartin Link Road is welcomed but concerned with facilitating the road prior to the construction of a development as it may prejudice the delivery of the development and it should be open to the applicants to demonstrate that the development can be delivered in the absence of the road (noting the high quality public transport existing and proposed in the area).</li> <li>• Should the delivery of the road be needed for the development of the lands it is requested that P6 is revised to allow permission to be granted with a condition to limit the operation of it until such time as the infrastructure is in place.</li> </ul>	<p><b><u>B0978</u></b> <b><u>B1011</u></b></p>		<p>The Executive notes the issue raised. The Bracken Road and the Drumartin Link Road has received part 8 planning approval and will be progressed in the future subject to funding.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>ii) Request omission of Phasing Objective P4, as it is considered that these infrastructural works can be agreed with Irish Water through connection agreements and should not be impeding development.</p>	<p><b><u>B0823</u></b> <b><u>B0978</u></b> <b><u>B1011</u></b></p>		<p>The Executive notes the issue raised. P4 and P5 state as follows</p> <p><i>P4 It is an objective of the Council, in co-operation with Irish Water, that within Sandyford Business Estate no additional development shall be permitted to commence construction until the new tank sewers in the Blackthorn Avenue environs commences construction.</i></p> <p><i>P5 It is an objective of the Council, in co-operation with Irish Water, that within Central Park and South County Business Park no additional development shall be permitted to commence construction until the new foul sewer line from Central Park across Leopardstown Road to Burton Hall Road commences construction.</i></p> <p>Submissions puts forward the argument that these objectives should be removed from the Plan as provision of foul sewer infrastructure is solely a matter for Irish Water. It is agreed</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>that these matters can be dealt with via the Development Management process. Following Consultation with Irish Water a new Policy Objective is recommended.</p> <p><b>Recommendation</b>            Replace P4 with the following wording  <i>It is an objective of the Council, in co-operation with Irish Water, that within Sandyford Business Estate, Central Park and South County Business Park applicants will be required to submit Confirmation of Feasibility from Irish Water to the Planning Authority with any planning applications."</i>            Remove P5            Remove and update references throughout the SUFP</p>
<b>3.29.5: Transport</b>			
<p>i) Need to increase the integration and linkages of cycleways and walkways so as to ensure easy mobility within the District. Add an Integrated Mobility Infrastructure Plan for the SUFP Objective.</p>	<b><u>B0919</u></b>		<p>The Executive note the issue raised. The Traffic section have reported that both permeability linkages and cycleway projects are being progressed in the SUFP area. Two permeability linkages at Arkle Rd and Ballymoss Rd are being progressed in 2021 along with new cycleways on Carmahall and Blackthorn Road. Public consultation will form part of these schemes. It is not considered that there is a need for a separate Integrated Mobility Infrastructure Plan. Considerable work has been carried out under the Sandyford Smarter Travel initiative which supports the Sandyford Business District through partnership and co-operation between the Council, businesses throughout the district and people travelling to and from the wider area as they go about their work and daily lives. The SUFP area will be looked at as part of the Countywide cycle network review.</p> <p><b>Recommendation</b>            No change to Draft Plan.</p>
<b>3.29.6: Community and schools</b>			
<p>i) A sense of community is lacking in Sandyford as commercial development predominates. A key factor for businesses in site selection is the availability of accommodation and support neighborhood services to ensure employee attraction and retention. There is also a need to transform the transient community that</p>	<b><u>B0819</u></b> <b><u>B0919</u></b> <b><u>B0933</u></b>		<p>The Chief Executive notes the issue raised.</p> <p>Section 4,3 "Community Infrastructure Policies and Objectives" of the Draft SUFP addresses community infrastructure. Policy SUFP 9 and 10 relates to community facilities and Educational needs respectively. The 2 sites with SLOS for school are being retained and this has the support of the Department of Education. There is also a specific local objective to facilitate the provision of a community facility at ground floor level along the eastern outer</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>predominates to a more permanent community in order to allow a neighbourhood character to develop.</p> <ul style="list-style-type: none"> <li>• Need for informal community meeting places to be located throughout the District culminating in a central civic hub to create a sense of place and belonging for both residents and workers.</li> <li>• Quality leisure and community facilities, hotel and pool are also required.</li> </ul>			<p>edge of the Carmanhall Residential Neighbourhood, along Blackthorn Road. A temporary school is also operating in the area. There are three areas within the SUFP area that have the new SNI zoning objective. The County Community Audit will include the SUFP area and will inform future policy. It is considered that a character unique to the SUFP area is already starting to emerge. Areas are also ear marked for open space which is critical in supporting communities and allowing neighbourhood identities emerge.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Sandyford/Stillorgan - Department of Education reaffirms requirement for both sites in the SUFP area.</p>	<b>B1066</b>	6	<p>The Executive note and welcome the submission from the Department of Education and Skills. The Draft Plan has retained both sites identified by way of SLOs for schools in the Draft Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submission notes/requests the following regarding Leopardstown Park Hospital:</p> <ul style="list-style-type: none"> <li>• That Drawing 11 in the SUFP is amended to avoid conflict with the zoning objective for the site by removing the designation of an area of the site as 'Open Space' on the drawing as this gives the impression that it will be accessible to the public</li> <li>• Raises issue of contractionary request for masterplan on the lands</li> <li>• Submission requests the rewording of the requirement that future development at LPH "will not impact on peak hour trips" to allow for a degree of flexibility in terms of traffic impact and to ensure that the hospital can continue to operate and expand to provide enhanced healthcare facilities to residents</li> </ul>	<b>B1004</b>		<p>The Executive notes the issues raised. See section 3.14 Specific Local Objectives for proposed strengthening of SLO63.</p> <p>Drawing 11 entitled <i>Design Principles and Character areas</i> shows significant green areas throughout the entire SUFP lands. The drawing is indicative only and open space requirements for individual sites will be assessed in accordance with the standards for communal, public and private open space set out in the Plan.</p> <p>It is acknowledged that there is a contradiction between the requirement for a masterplan as set out in section 2.3.6 and section 3.5 as one refers to a masterplan for the residual lands and one refers to masterplan for the overall site. To avoid confusion this should be amended. It is considered that development of the Leopardstown Park Hospital lands should have regard to an overall masterplan as set out in section 3.5. It is noted that a concern is raised around the potential requirement for a masterplan for relatively small applications such as extensions. Applications for relatively minor extensions of the current facility may not require a masterplan and this issue can be teased out at pre planning stage.</p> <p>The requirement that future development of hospitals with in the SUFP area "will not impact on peak hour trips" was an important part of the overall transport planning for the SUFP area. The request to alter same in relation to LPH is not supported.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p><b>Recommendation</b>  Amend section 2.3.6 page 15 as follows;  <i>This zoning also includes lands known as Legionaries of Christ lands. The current use of these is educational and religious. This is located proximate to the mixed use neighbourhood of Central Park, Leopardstown Road and the M50.</i></p> <p><i>The residual lands within Zone 6 shall be developed to a Master Plan to enable their full potential to be realised</i>  To</p> <p><i>This zoning also includes lands known as Legionaries of Christ lands. The current use of these lands is educational and religious. They are located proximate to the mixed use neighbourhood of Central Park, Leopardstown Road and the M50.</i></p> <p><i>The residual lands within Zone 6 shall be developed in <u>accordance with an overall Master Plan (see also section 3.5)</u> to enable their full potential to be realised.</i></p>
<b>3.29.7: Employment lands</b>			
<p>i) Appended report notes that “there is very little industrial stock available in the Dublin market and this is unlikely to be alleviated anytime soon given the low levels of new industrial accommodation in the development pipeline.”</p>	<p><b><u>B0843</u></b>  <b><u>B0954</u></b>  <b><u>B0959</u></b>  <b><u>B1028</u></b></p>		<p>The Executive notes the issue raised.</p> <p>In the SUFP area Zone 4 Light Industrial/Warehousing provides space for light industrial development</p> <p><b>Recommendation</b>  No change to Draft Plan.</p>
<b>3.29.8: Land Use Zoning</b>			
<p>i) A number of submissions were received pertaining to various sites on Blackthorn Road. Issues raised include the following;</p> <ul style="list-style-type: none"> <li>• Suggest a rezoning to MIC,</li> <li>• Rationale for rezoning to SNI is not clear,</li> </ul>	<p><b><u>B0819</u></b>  <b><u>B0978</u></b>  <b><u>B1011</u></b></p>		<p>The Executive considers that the rational put forward to rezone land holdings within a larger area zoned SNI to MIC - mixed use inner core area does not take into consideration the overall SUFP. The lands are subject to the new SNI zoning objective where a variety of uses are both permitted in principle and open for consideration. The new land use zoning objective has been applied to land parcels that contains one or more of educational, health, community / social uses or facilities. In the case of the subject sites the existing medical uses and the</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<ul style="list-style-type: none"> <li>• SNI is an overly prescriptive use class and requirements do not reflect the true nature of the subject site</li> <li>• Considers the lands centrally located at Sandyford Business Park to be ideal for residential development.</li> <li>• With regard to SNI open space requirement, the lands do not provide a campus or institutional environment where significant open space is available. A flexible approach in this regard should be applied.</li> <li>• suggest that a mixed use zoning with specific objectives to provide for assisted living, step down facilities, social housing, a hotel and a swimming pool and/or other facilities for local workforce and community be included rather than the proposed SNI objective which is too restrictive.</li> </ul>			<p>wider area that was zoned MH has been zoned to SNI so as to ensure the expansion of the Health/Medical uses in accordance with policy and to ensure SLOs in the Draft Plan can be facilitated. The purpose of a social infrastructure land use zoning objective is twofold:</p> <ul style="list-style-type: none"> <li>• to identify where social infrastructure facilities and their associated amenities are located within the County, and</li> <li>• to protect and/or improve the existing social infrastructure function of these land parcels</li> </ul> <p>Step down medical/Rehabilitation and assisted living are both permitted in principle and residential is open for consideration. To allow hotel and residential to be permitted in principle would in the opinion of the Executive undermine the overall zoning objective. It should be noted that the use of the SNI land use zoning objective in the SUFP area is consistent with its use in other parts of the County.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submissions request the following:</p> <ul style="list-style-type: none"> <li>• Rezoning of lands at Corrig Avenue from F to E so that the owners have their commercial use rights reinstated.</li> <li>• Considers that the Council have not pursued the provision of the public civic park at this location.</li> <li>• Considers that the location is well removed from any demand for open space.</li> <li>• Current uses are non-conforming</li> <li>• Submissions request rezoning of lands at 26 Corrig Avenue from objective F to objective A2, Zone 5. Considers zoning is inconsistent with the long-established commercial use of the site and results in the site being blighted.</li> </ul>	<p><b><u>B0565</u></b> <b><u>B0592</u></b> <b><u>B0634</u></b> <b><u>B0813</u></b> <b><u>B0829</u></b> <b><u>B1239</u></b> <b><u>B1246</u></b></p>		<p>The Executive notes the issues raised.</p> <p>The provision of a Civic Park within Sandyford Business District was originally identified within the 2010-2016 County Development Plan. In this regard, SLO No. 100 of the 2010-2016 County Development Plan states: <i>“To provide a civic square in Sandyford Business Estate to serve as an amenity for the whole County”</i>. The SUFP - as adopted in 2011 - ensured consistency with the provisions of SLO No. 100 as originally identified within the 2010-2016 County Development Plan.</p> <p>The identification of Open Space or “F” zoned lands in the SUFP - in this instance a Civic Park – were established through an assessment of the existing Green Infrastructure and the requirement to plan for the needs of the proposed community (residents, visitors and employees) in terms of high quality open space, recreation and play opportunities. During the original drafting of the SUFP – in 2009/2010 – the associated Background Papers identified the importance of providing high quality accessible open space - within a hierarchy of open spaces - to accommodate the environmental, social and community needs of the Framework Plan</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>area and to provide opportunities for recreation/relaxation and socialising within the business/ employment and residential districts. The provision of a Civic Park at the corner of Corrig Road and Carmanhall Road was – and remains - central to the aforementioned hierarchy of open space provision.</p> <p>As proposed, it is at the heart of the mixed-use core area, adjacent to a not yet developed residential area and to the south of significant permitted residential development on the Tivway and Rockbrook sites. The Tivway site has recently commenced construction. The current proposed location of the park fed into the public realm approach on these two applications. It will also have an important relationship with Carmanhall Road which will have a linear greenway running from Ravens Rock Road to Carmanhall Road and widening into the Civic Park</p> <p>The Council are committed to securing funding for the park but have been unsuccessful in 2 recent funding URDF applications to progress the Park.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Request rezoning from SNI to A2 on a portion of lands at Leopardstown Park Hospital so as to allow residential. Reasons are set out as to why the lands are suitable for residential development including the fact that the lands are not required by the hospital in the future, lands are suitable for residential use due to close proximity to public transport, proposed residential zoning is consistent with national and regional planning policy.</p>	<p><b>B0843</b></p>	<p>6</p>	<p>The Executive would not agree with this zoning request. The Executive notes the issue raised.</p> <p>The Draft Plan introduces a new land use zoning objective – SNI – “<i>To protect, improve and encourage the provision of sustainable neighbourhood infrastructure</i>”. This new land use zoning, Objective SNI, has been applied to:</p> <ul style="list-style-type: none"> <li>• land parcels that contain existing SNI facilities together with its associated amenity / recreational space, e.g. schools, community facilities, places of worship and their associated parish / cultural centres, health care facilities.</li> <li>• lands zoned objective ‘MH’ in the current 2016-2022 plan have also been zoned Objective SNI.</li> <li>• Lands with an extant planning permission for a new SNI facility – as in the case with lands in Ballyogan where a new school has been permitted.</li> </ul> <p>The SNI land use zoning objective seeks to protect or improve existing SNI facilities / uses and identifies existing facilities. An aim of the SNI zoning objectives are to ensure that both</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>existing and emerging residential areas are provided with and can continue to be served by an adequate level and an appropriate range of supporting social and community infrastructure.</p> <p>As set out in Table 13.1.7 (pg. 306), Chapter 13 of the Draft Plan, a number of uses are both permitted in principle and open for consideration under the land use zoning Objective SNI – <i>“To protect, improve and encourage the provision of sustainable neighbourhood infrastructure.”</i> Uses include ‘Education’ being permitted in principle and ‘Residential’ being open for consideration.</p> <p>It is acknowledged that there will be sites in the County subject to the SNI zoning objective that may be capable of accommodating other forms of development whilst still protecting existing SNI facilities and the recreational value of such sites. All proposed development on lands zoned SNI will be subject to compliance with the requirements of Section 12.3.2.1 ‘Development within Sustainable Neighbourhood Infrastructure Lands.’</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Seek the rezoning of the subject lands adjacent to Blackthorn Park from ‘LIW’ to Objective SNI - to allow for the creation of a Sustainable Neighbourhood that will provide an appropriate gateway to the Sandyford Business District, improving the public realm and commercial edge and creating enhanced linkages with surrounding communities.</p>	<p><b>B0812</b></p>	<p>6</p>	<p>The Executive would not concur with this submission. The new land use zoning SNI was applied to land parcels that contains one or more of educational, health, community / social uses or facilities. The subject lands comprise a variety of low rise, low density industrial buildings and therefore they do not meet these criteria.</p> <p><i>As stated in the Draft SUIP “Zone 4 currently encompasses traditional low density, low rise warehouse type development located within Stillorgan Industrial Estate and along Heather/Furze/Bracken Road and areas on the southern and western periphery of Sandyford Business District. Due to their location, and also given the carrying capacity of infrastructure in the overall area, these lands lend themselves to a continuation of lower intensity employment uses such as warehousing, car showrooms, and light industrial uses”</i></p> <p>Given the surroundings land use zones which are facilitating intensive brown field redevelopment, it is important that there are lands available for less intensive commercial development and employment uses. There are already three areas subject to the SNI zoning objective in the SUIP area. The inclusion of these lands would undermine low intensity</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>employment uses and would not align with the rationale used for SNI zoning throughout the Draft Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>v) Irish Water requests that the zoning objective for Stillorgan Reservoir be amended from Zoning Objective F: ‘To preserve and provide for open space with ancillary active recreational amenities’ to the current use of ‘Public Infrastructure and Utilities’ and similarly establish a zoning matrix that specifically describes water supply infrastructure as being permitted in principle.</p>	<p><b>B0904</b></p>	<p>6</p>	<p>The Executive does not concur with the submission that a site specific “<i>Public Infrastructure and Utilities</i>” zoning objective is required.</p> <p>The submission from Irish Water requests this new land use zoning objective and suggests that it be applied to the Stillorgan Reservoir site. These lands are zoned ‘F’ – “<i>To preserve and provide for open space and ancillary recreational amenities</i>” under which ‘Public Services’ are ‘Open For Consideration’. The Chief Executive would highlight the definition of ‘Public Services’ – below - which includes explicit reference to “<i>other statutory undertakers</i>” of which Irish Water are one.</p> <p><i>“A building or part thereof, a roadway or land used for the provision of ‘Public Services’. ‘Public Services’ include all service installations necessarily required by electricity, gas, telephone, radio, telecommunications, television, data transmission, water, drainage and other statutory undertakers; it includes public lavatories, public telephone boxes, bus shelters, bring centres, green waste composting facilities, etc. ‘Public Services do not include commercial data centres”</i></p> <p>The definition was amended in the 2016 Plan to specifically include water as a public service. This was on foot of a submission from Irish water.</p> <p>The provision of open space in a redevelopment area such as the SUFP area is more difficult than on a greenfield site. This makes the potential of these lands all the more important. The site in question is considered an integral part of the future provision of public open space within the SUFP area and its potential designation as ‘Public Infrastructure and Utilities” is not supported by the Chief Executive.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>vi) Requests rezoning of the Febrve site (Burton Hall Road) from Zone 3 office to Zone 5: Residential. It is</p>	<p><b>B1103</b></p>	<p>6</p>	<p>The Executive would not agree with this zoning request.</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<p>considered that the site is suited to a residential development noting that the Marlett site across the road will be the first phase of the Carmanhall Road residential neighbourhood.</p>			<p>The RSES identifies the SUFP area as a strategic employment location accessible by public transport and is identified in the Draft Plan as a key employment area in the County. The land-use zoning objectives contained within the adopted Sandyford Urban Framework Plan (SUFP) were predicated upon an extensive assessment of the unique location and character of the area in tandem with detailed transportation modelling.</p> <p>The Draft SUFP makes provision for additional residential units to be delivered over the lifetime of the Plan within Zone 5.</p> <p>. Section 6.4.2.7 policy Objective E8 of the Draft Plan recognises that the SUFP area has <i>“significant potential for increased land efficiency and densification through intensification of existing brownfield sites for additional High Intensity Employment”</i>. The Draft Plan states that <i>“The Sandyford Business District remains the primary employment centre in DLR and the Council will support the continued redevelopment and densification of Sandyford Business District to provide for high quality office accommodation along with supporting facilities. The provision of additional uses in the Sandyford Business District will be strictly in accordance with the provisions of the Sandyford Urban Framework Plan”</i>. It is important that this role is not undermined.</p> <p>The Planning Authority consider that sufficient residential development has been permitted in the MOC and MIC areas combined and wishes to ensure a sustainable mix of uses in the overall area. The focus is therefore on reuse and regeneration of brownfield sites for residential development in the A2 residential lands for the 6 year duration of the 2022 – 2028 County Development Plan</p> <p>The Chief Executive considers rezoning the le Fevbre from zone 3 - Office Based Development to zone 5 - residential would be in conflict with the rationale behind the overarching imperative influencing the Urban Framework Plan for Sandyford. The SUFP was crafted based on detailed analysis of the existing situation in Sandyford Business District outlining the scale and mix of development already permitted and the potential to be unlocked based on upgraded infrastructure capacities to provide for future plan-led growth.</p> <p>Rezoning lands in zone 3 Office Based Employment to zone 5 Residential would not only have a significant negative impact on the carrying capacity of the physical infrastructure within the</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>overall SUFP area but could also undermine provision of employment uses within the SUFP lands.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>vii) The site known as ‘Via Verde’, bounded by Blackthorn Avenue, Blackthorn Road and Burton Hall Road be amended to contain a designation that residential use is “Open for Consideration subject to the proposal being consistent with the proper planning and sustainable development of the area”.</p>	<p><b>B1028</b></p>		<p>The Executive notes the issue raised.</p> <p>The submission relates to a site bounded by Blackthorn Avenue, Blackthorn Road and Burton Hall Road. The site is currently zoned OE: Office Based employment uses and is also subject to SLO 59 To ensure the provision of pocket parks and civic spaces in accordance with locations specified on the Sandyford Urban Framework Plan.</p> <p>To allow residential use to be Open for Consideration in the OE zone would as documented in the response above impact on protection of employment lands in the County and have a significant negative impact on the carrying capacity of the physical infrastructure within the overall SUFP area.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

### 3.30: Strategic Environmental Assessment and Appropriate Assessment

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
<b>3.30.1: Strategic Environmental Assessment</b>			
i) Submission notes that a ‘self service’ approach is used via the ‘SEA of Local Authority Land Use Plans – EPA <b>Recommendations</b> and Resources’. These should be taken into account in finalising and implementing the Plan.	<b>B0038</b>		<p>The Executive notes the issue raised.</p> <p>The ‘SEA of Local Authority Land Use Plans – EPA <b>Recommendations</b> and Resources’ will be taken into account in finalising and implementing the SEA.</p> <p><b>Recommendation</b> No change to Draft Plan SEA or AA.</p>
ii) Submission notes that The State of Environment Report Ireland’s Environment - An Assessment 2020 (EPA, 2020) identifies thirteen Key Messages for Ireland which align with many of the UN Sustainable Development Goals (SDGs) the relevant aspects of which should be taken into account in preparing the plan and the SEA.	<b>B0038</b>		<p>The Executive notes the issue raised. The UN Sustainability Goals have been informed and guided the preparation of the Plan, see Policy Objective UN1 – United Nations Sustainability Goals, which states: <i>“It is a Policy Objective of the Council to contribute, as practicable, via this Plan toward achievement of the 17 Sustainability Goals of the United Nations’ 2030 Agenda for Sustainable Development”</i>.</p> <p>The Environmental Report refers to the Plan contributing to the implementing the UN Sustainability Goals Section 4.3 Sustainable Development Goals.</p> <p><b>Recommendation</b> No change to Draft Plan SEA or AA.</p>
iii) Submission welcomes the use of environmental sensitivity mapping to help inform the areas needing greater levels of protection to help avoid potential cumulative adverse environmental effects.	<b>B0038</b>		<p>The Executive welcomes the positive comments on the issues raised.</p> <p><b>Recommendation</b> No change to Draft Plan SEA or AA.</p>
iv) Submission notes the HSE NUIG UCD research reports and associated toolkits which could be used in relation to the monitoring of the plan. The Monitoring Programme should take into account positive and negative effects; be flexible to take account of specific environmental issues and	<b>B0038</b>		<p>The Executive notes the issue raised.</p> <p>The required information on monitoring measures is provided in Section 10 of the SEA Environmental Report - this will inform the final Programme to be included in the SEA Statement. The guidance cited in the submission on SEA-related monitoring has been and will be taken into account in undertaking the SEA and preparing the Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
unforeseen adverse impacts, cumulative effects and ensure effective remedial action is taken.			<p><b>Recommendation</b> No change to Draft Plan SEA or AA.</p>
<p>v) Submission suggests that An SEA Statement should be prepared in accordance with the EPA Guidance and sent to the environmental authorities once the plan is adopted and should summaries:</p> <ul style="list-style-type: none"> <li>• How environmental considerations have been integrated into the Plan.</li> <li>• How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan.</li> <li>• The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and,</li> <li>• The measures decided upon to monitor the significant environmental effects of implementation of the Plan.</li> </ul>	<b>B0038</b>		<p>The contents of this submission are welcomed. The SEA statement will be prepared in accordance with the recommendations of the submission.</p> <p><b>Recommendation</b> No change to Draft Plan SEA or AA.</p>
<p>vi) Regarding monitoring of the Plan and the SEA in terms of Article 10 the submissions note:</p> <ul style="list-style-type: none"> <li>• Monitoring needs to be strengthened in terms of the SEA to identify at an early stage unforeseen adverse effects of implementing the Plan and to be able to take appropriate remedial action.</li> <li>• A new Policy Objective should be added to Chapter 15 to address the monitoring of the significant environmental effects of implementation of the Development Plan in the 2 Year Progress Report to the members of the authority.</li> </ul>	<b>B0049</b> <b>B0794</b>		<p>The Executive notes the issue raised.</p> <p>As set out previously with regard to Chapter 15 of the Plan, the Executive considers that the insertion of a Policy Objective would appropriately reflect the Council's commitment to environmental monitoring requirements, in accordance with Article 10 of the SEA Directive. Whilst a two-year progress report is currently prepared, it is acknowledged that there is a need to strengthen the integration of environmental monitoring and specific SEA monitoring as a component part of the overarching approach to Plan implementation, monitoring and evaluation.</p> <p><b>Recommendation</b> Insert a new Policy Objective at the end of Section 15.4 (pg. 334) as follows:</p> <p><i>'IME1: SEA Monitoring</i></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<i>It is a Policy Objective to monitor the significant environmental effects of the implementation of the County Development Plan through the monitoring measures and reporting requirements set out in Section 10 of the SEA Environmental Report for the County Development Plan.'</i>
vii) To ensure integration of environmental considerations into the Plan, the submission should include a general policy or land use zoning should not be maintained where likely significant effects on the environment are identified.	<b>B0794</b>		The Executive notes the issue raised. The ongoing iterative and statutory SEA and AA processes ensure that no land use zoning or Policy Objective have any significant effects on the environment. Where potentially adverse effects have been identified by the environmental assessments, mitigation has been recommended and the Council has integrated these recommendations into the Plan.  <b>Recommendation</b> No change to Draft Plan SEA or AA.
viii) Submission is pleased to see use of the following: <ul style="list-style-type: none"> <li>● GSI Groundwater data sets.</li> <li>● online mapping data sets for Landslide Events and Landslide Susceptibility.</li> <li>● Aggregate Potential Mapping dataset and Mineral map in Figure 4.19 'Minerals Localities' in the SEA Environmental Report.</li> <li>● Submission commends the recommendation to use GSI Aggregate Potential Mapping, Bedrock mapping, Quaternary and Physiographic mapping, National Aquifer and Recharge mapping datasets when planning and assessing the environmental aspects of projects.</li> </ul>	<b>B0249</b>		The Executive welcomes the positive comments on the issues raised.  <b>Recommendation</b> No change to Draft Plan SEA or AA.
ix) Submission considers that the data from the "Historic Mine Site - Inventory and Risk Characterisation (HMS - IRC)" project would be of benefit when assessing and/ or promoting the Industrial Heritage of DLRCC in Section 4.12.2 'Architectural Heritage' of the SEA environmental report.	<b>B0249</b>		The Executive notes the issue raised.  This additional level of detail may be of relevance for project level assessments, however, it is not considered appropriate to the scale of the SEA for the County Development Plan.  <b>Recommendation</b> No change to Draft Plan SEA or AA.
x) Submission recommends updating to the EU Biodiversity Strategy for 2030 in the environmental reports from the strategy for 2020.	<b>B0861</b>		The Executive agrees with the issue raised.

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>It is considered appropriate to update the SEA including Appendix I to the SEA Environmental Report to include reference to the EU Biodiversity Strategy for 2030.</p> <p><b>Recommendation</b>  Update Strategic Environmental Assessment Environmental Report Appendix I of the SEA Environmental Report to include reference to the EU Biodiversity Strategy for 2030.</p>
<p>xi) Submission states that the Development Plan must be underpinned by a firm commitment to be responsive to our national environmental challenges and to ensure that development occurs within environmental limits.</p>	<b>B1047</b>		<p>The Executive notes the issue raised.</p> <p>The County Development Plan is underpinned by various firm commitments that respond to national environmental challenges and will help to ensure that development occurs within environmental limits.</p> <p><b>Recommendation</b>  No change to Draft Plan SEA or AA.</p>
<p>xii) Submission stated that SEA should take into account the measurement of carbon emissions arising, as an environmental impact, and evaluate changes against the DLR Climate Change baseline emissions report and will include both measurement and mapping of ES in the County and report on measured changes in the delivery of same.</p>	<b>B1088</b>		<p>The Executive notes the issue raised.</p> <p>The required information on monitoring measures is provided in Section 10 of the SEA Environmental Report - this will inform the final Programme to be included in the SEA Statement. Various elements relating to ecosystem services have been integrated into this Programme.</p> <p>As is required, the SEA provides an appropriately scaled assessment of the likely significant environmental effects of implementing the Plan, including a qualitative assessment against relevant targets relating to emissions.</p> <p><b>Recommendation</b>  No change to Draft Plan SEA or AA.</p>
<p>xiii) Submission requests that consideration be given to utilising sections of the Natura Impact Report and SEA Environmental Report which describe the natural resources of the County in the introductory Chapter so as to assist in placing the Plans role in conserving the County's natural heritage in context.</p>	<b>B1247</b>		<p>The Executive notes the issue raised and whilst the sentiment is understood the written Statement of the Plan already exceeds 350 pages.</p> <p>To repeat sections contained in the SEA and AA in Chapter 1 would in the view of the Executive result in duplication and the unnecessary further lengthening of the document.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>Chapter 1 already provides a short section explaining both Strategic Environmental Assessment (Section 1.3.1) and Appropriate Assessment (Section 1.3.2).</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>xiv) Regarding Archaeological Heritage (Section 4.12.1 of the SEA Environmental Report) fifteen Monuments in State Care are listed including Howth Church. This monument is located in Fingal County Council and should not be included in the Dún Laoghaire-Rathdown CDP</p>	<p><u>B1247</u></p>		<p>The Executive agrees with the issue raised.</p> <p>Howth Church is listed erroneously on page 57 of the SEA Environmental report. This will be removed</p> <p><b>Recommendation</b> Remove 'Howth Church' from list of 15 monuments in state care in the Strategic Environmental Assessment Environmental Report</p>
<p>xv) In the SEA Environmental Report Table 10.1 Indicators, Targets, Sources and Remedial Action there is a section covering Cultural Heritage. The column that covers remedial action has the following entry: "Where monitoring reveals visitor pressure is causing negative effects on key tourist features along these routes, the Council will work with the Regional Assembly, Fáilte Ireland and other stakeholders to address the pressures through additional mitigation tailored to the plans." It is considered that this should be redrafted as it is not connected to the previous columns.</p>	<p><u>B1247</u></p>		<p>The Executive notes the issue raised with regard to the wording of the remedial action on entries to monuments and places (page 156 of the SEA Environmental Report).</p> <p>It is considered appropriate to redraft the remedial action to refer to the entries to monuments and places.</p> <p><b>Recommendation</b> In Table 10.1 Indicators, Targets, Sources and Remedial Action of the Strategic Environmental Assessment Environmental Report revise the Remedial Action update text as follows from: "Where monitoring reveals visitor pressure is causing negative effects on key tourist features along these routes, the Council will work with the Regional Assembly, Fáilte Ireland and other stakeholders to address the pressures through additional mitigation tailored to the plans." to "Where monitoring reveals visitor <del>pressure</del> or development pressure is causing negative effects on <del>key tourist features</del> <u>designated archaeological or architectural heritage</u>, the Council will work with Regional Assembly, Fáilte Ireland and the National Monuments Service and other stakeholders, as relevant, to address pressures through additional mitigation."</p>



### 3.31: Land Use Mapping

Issues	Sub. No.	Executive’s Response & Recommendation
<b>3.31.1: Map 1</b>		
<p>i) Submissions requests that green amenity space at Charleville, Lower Churchtown Road, should be rezoned from A to F.</p>	<p><b><u>B0040</u></b> <b><u>B0147</u></b></p>	<p>The Executive agrees with the issue raised.</p> <p>The area in question is located between no. 10 and 11 Charleville, Churchtown. The area acts as a green open space serving as a recreational area for local residents (site visit to confirm use).</p> <p>This residential development was permitted in 1973 under Reg. Ref. F.662. Condition no.7 of this permission states: <i>“That the areas shown as open space and play areas are reserved as public open space and levelled, soiled, and seeded and landscaped to the satisfaction of the County Council and to be available for use by residents on completion of their dwellings, and that the land shown as open space be in full ownership of the developer prior to commencement of development.”</i></p> <p>The Property Management section of the Council have confirmed that this area is conditioned open space. This area is maintained by the Council’s Parks Department.</p> <p>Given that this area of land functions as open space, is conditioned as open space and is maintained as open space, it is considered appropriate to change the land use zoning in the Draft Plan from objective ‘A’ – <i>“To provide residential development and/or protect and improve residential amenity”</i> to objective ‘F’ – <i>“To preserve and provide for open space with ancillary active recreational amenities.”</i></p> <p><b>Recommendation</b> Amend map 1 to change the lands between nos. 10 and 11 Charleville, Churchtown from zone objective A to zone objective F.</p>
<p>ii) Disagrees with the use of different coloured boundaries to depict different stages of architectural conservation e.g. Dundrum and suggests that all areas are preserved immediately.</p>	<p><b><u>B0047</u></b></p>	<p>The Executive notes the issue raised.</p> <p>Different colours area applied to maps in order to differentiate between Architectural Conservation Areas (ACA’s, in blue) and Candidate Architectural Conservation Areas (cACA’s, in red).</p>

Issues	Sub. No.	Executive’s Response & Recommendation
		<p>The Draft Plan proposes to adopt a number of new ACA’s which are also highlighted on land use maps (in purple). In the event that these proposed ACA’s are adopted, this third coloured boundary will be removed and depicted as an ACA. This means that the final adopted Plan maps will be simpler and easier to view in relation to ACAs.</p> <p><b>Recommendation</b> No change to Draft Pan.</p>
<p>iii) Submission requests that a green area at the end of Friarsland Road be rezoned from A to F. A map showing each area is included.</p>	<p><b><u>B0529</u></b></p>	<p>The Executive agrees with the issue raised.</p> <p>The area in Friarsland Road is located within a cul-de-sac at the northern end of the road adjacent to no.54 and immediately adjoining the western boundary of Our Lady’s Grove School.</p> <p>The area acts as a green open space serving as a recreational area for local residents.</p> <p>This residential development appears to have been permitted in 1969 under Reg. Ref. RA.1577. Condition no.4 of this permission states: <i>“That the four bungalows proposed for sites Nos. 29, 30, 31 and 32 on the lodged plans be omitted from the development and that the area of these four sites be reserved as public open and levelled, soiled, seeded and landscaped to the satisfaction of the Co. Council and to be available for use by residents on completion of their dwellings.”</i></p> <p>The original drawings showing the location of this open space are not available, however, given that the area in question is the only open space area serving Charleville, it is reasonable to assume that condition no.7 referred to this area.</p> <p>The Property Management section of the Council have confirmed that a deed of dedication for this area was executed in 1987, however, the land in question is not registered to DLR and may still be registered to the developer of Friarsland. This area is maintained by the Councils Parks Department.</p> <p>Given that this area of land functions as open space, has been dedicated to the Council and is maintained as open space, it is considered appropriate to change the land use zoning in the</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>Draft Plan from objective 'A' – "To provide residential development and/or protect and improve residential amenity" to objective 'F' – "To preserve and provide for open space with ancillary active recreational amenities."</p> <p><b>Recommendation</b> Amend map 1 to change the lands located at the southern end of Friarsland Road, between no. 54 and the boundary of Our Lady's Grove School, from zone objective A to zone objective F.</p>
<p>iv) Submission requests that a green area at the end of Belfield Downs be rezoned from A to F. A map showing each area is included.</p>	<p><b>B0529</b></p>	<p>The Executive agrees with the issue raised.</p> <p>The area in Belfield Downs is located within a cul-de-sac at the southern end of the road, to the south of an open space already zoned objective 'F' and between no.29 and Belfield Lodge, Goatstown Road.</p> <p>The area acts as an incidental green open space serving as a recreational area for local residents.</p> <p>This residential development appears to have been permitted in 1984 under Reg. Ref. YA/1545. Condition no.4 of this permission states: <i>"The area shown as open space shall be reserved as public open space and shall be soiled, seeded, planted and landscaped in accordance with a detailed scheme to be submitted to and agreed with Dublin County Council. In default of such agreement, details of the scheme shall be determined by An Bord Pleanála. Apart from tree and shrub planting on the public open space, the site generally shall be planted and landscaped in accordance with a scheme to be submitted to and agreed with Dublin City Council or in default of such agreement, details of the scheme may be determined by An Bord Pleanála. All existing mature and semi-mature trees on the site, particularly those along the boundaries, shall be retained save where removal of some of them is necessary in order to facilitate essential building operations. The trees to be retained shall be adequately protected by fencing while development works are in progress."</i></p> <p>The original drawings showing the location of this open space are not available, however, it is reasonable to assume that condition no.4 refers to the open space areas serving Belfield Downs.</p>

Issues	Sub. No.	Executive’s Response & Recommendation
		<p>The Property Management section of the Council have confirmed that there is a deed of dedication for this area (Ref. 20/4/90). This area is maintained by the Council’s Parks Department.</p> <p>Given that this area of land functions as open space, has been dedicated to the Council and is maintained as open space, it is considered appropriate to change the land use zoning in the Draft Plan from objective ‘A’ – “To provide residential development and/or protect and improve residential amenity” to objective ‘F – “To preserve and provide for open space with ancillary active recreational amenities.”</p> <p><b>Recommendation</b>  Amend map 1 to change the lands located at the southern end of Belfield Downs, between no.29 and Belfield Lodge, from zone objective A to zone objective F.</p>
<p>v) Differing views and requests are made in various submissions in relation to lands at Our Ladies Grove, Goatstown as follows:</p> <ul style="list-style-type: none"> <li>• Support for the new SNI zoning, retention of the INST objective and F zoning at Our Ladys Grove, however,</li> <li>• Request that the SNI zoning extends to include the access road.</li> <li>• Request that the extent of the ‘Objective SNI’ zoning be reduced slightly so that it is restricted to the lands within the school’s ownership and respects the realignment of the hockey pitch which has taken place.</li> <li>• Requests the rezoning of the portion with the F land use zoning objective to A as the lands are not suited to the provision of a parkland/recreational use or similar owing to their size, location and the surrounding context.</li> </ul>	<p><b><u>B0529</u></b>  <b><u>B0785</u></b>  <b><u>B0906</u></b>  <b><u>B1134</u></b></p>	<p>The Executive notes the issues raised.</p> <p>The Draft Plan introduces a new land use zoning objective – SNI – “<i>To protect, improve and encourage the provision of sustainable neighbourhood infrastructure</i>”. This new land use zoning, Objective SNI, has been applied to:</p> <ul style="list-style-type: none"> <li>• land parcels that contain existing SNI facilities together with its associated amenity / recreational space, e.g. schools, community facilities, places of worship and their associated parish / cultural centres, health care facilities.</li> <li>• lands zoned objective ‘MH’ in the current 2016-2022 plan, and that contain an existing health care facility, have also been zoned Objective SNI.</li> <li>• Lands with an extant planning permission for a new SNI facility – as in the case with lands in Ballyogan where a new school has been permitted.</li> </ul> <p>The SNI land use zoning objectives seek to protect or improve existing SNI facilities / uses and identifies existing facilities. An aim of the SNI zoning objectives are to ensure that both existing and emerging residential areas are provided with and can continue to be served by an adequate level and an appropriate range of supporting social and community infrastructure.</p>

Issues	Sub. No.	Executive’s Response & Recommendation
<ul style="list-style-type: none"> <li>● Request removal of INST symbol from the site as the lands are no longer within the ownership of the Religious Congregation associated with Our Lady’s Grove School campus and both Schools have confirmed they do not require the lands for their future expansion.</li> <li>● Oppose the modifications to the ‘INST’ objective that require the open space lands to be specifically ‘public open space’ noting that whilst many institutional landholdings have the benefit of significant bodies of open space, these spaces are rarely accessible to the public.</li> <li>● Support expressed for removal of tree symbols from the site.</li> <li>● Submission considers that the requirement for public open space on the entire ‘INST’ designated lands should be a cumulation of usable spaces across the lands as opposed to a single block of open space as suggested under Motion No. 123</li> <li>● Draft Plan zoning map has not been updated to reflect the realigned hockey pitch</li> <li>● Submission relates to lands at Our Lady’s Grove, Goatstown.</li> <li>● Requests the site retains its Objective ‘A’ zoning.</li> <li>● Requests the INST Objective be omitted as it is no longer needed and the SNI zoning objective secures the retained educational facilities and their amenities.</li> <li>● Requests the ‘SNI’ zoning Objective aligns with the landownership boundaries.</li> </ul>		<p>In order to determine which lands and/or facilities are associated with the primary SNI use, boundaries used in planning histories have been reviewed and have been used in the application of the SNI zoning objective.</p> <p>The extent of the SNI land use objective at Our Ladys Grove had regard to the existing schools and their associated afterschool and outdoor recreational facilities. These facilities are primarily located to the north of the existing access road, as such, the northern portion of the overall land parcel had the SNI objective applied.</p> <p>Open space requirements for any future development on site would be assessed having regard to the requirements of Section 12.8 ‘Open Space and Recreation’ in Chapter 12 of the Draft Plan.</p> <p>It is considered that the lands zoned ‘F’ in the Draft Plan do not currently function as an area of public open space. It is further considered that the ‘INST’ objective is no longer warranted given the application of the ‘SNI’ land use zoning to the northern portion of the lands.</p> <p>The land use zoning Objective ‘F’ – <i>“To preserve and provide for open space with ancillary active recreational amenities”</i> is generally associated with lands that are in active use as publicly accessible open / recreation space, whether public parks or public open space within housing estates. It does also cover private facilities.</p> <p>While preparing the Draft Plan, there was no permission in place for development of lands to the south west of the overall land parcel. Subsequent to the Draft Plan going on public display, permission was granted by An Bord Pleanála, Reg. Ref. ABP30943021, on 3/6/2021 for student accommodation. This development is located within the lands zoned objective ‘F’ and part of the lands zoned objective ‘SNI’ in the Draft Plan.</p> <p>The approved scheme includes the retention of part of the existing afterschool facility. In addition, as set out on Page.55 of a supporting Planning Report by Thornton O’Connor Town Planning, <i>‘Figure 6.6: Image Showing the Proposed Open Space Provision of the Subject Scheme (within the Redline) and the Open Space within the Wider Institutional Landholding’</i> and an approved amenity space plan, provides for an amenity space area with a stated area of 280sq.m. to serve the existing, retained afterschool facility.</p>

Issues	Sub. No.	Executive’s Response & Recommendation
		<p>In general, public roads and the majority of existing / approved main access / distributor roads within newer developments are not subject to land use zoning and remain white on County Development Plan maps.</p> <p>The base mapping of Draft Plan maps uses OSI mapping. Given that the reoriented hockey pitch has only recently been completed, this has not yet been reflected on OSI mapping.</p> <p>See section 3.9 in relation to the reinstatement of tree symbols.</p> <p>In formulating this response the Executive have in accordance with section 12 (8) (b) (iii) of the Planning and Development Act, 2000, (as amended) taken account of the strategic direction received from the members at pre-draft stage <i>“To request that the Chief Executive enhance the existing County Development Plan policies in regard to the protection of recreational and community spaces and infrastructure including areas currently with an INST objective”</i>.</p> <p><b>Recommendation</b>            Having regard to the recent decision and the criteria for SNI zoning within the overall land parcel and further consideration of the land use zoning within the overall land parcel it is considered both reasonable and appropriate to amend map 1 to change the land use zoning to reflect the existing uses / facilities and the permitted development as follows:</p> <ul style="list-style-type: none"> <li>• <i>Change lands zoned ‘F’ in the Draft Plan to ‘A’.</i></li> <li>• <i>Amend the ‘SNI’ zoned portion of the site, as outlined in Red in Reg. Ref. ABP30943021 to ‘A’. Note: the ‘SNI’ objective shall remain in place for the afterschool facilities and its approved amenity space.</i></li> <li>• <i>Change the existing access road to white.</i></li> <li>• <i>Omit the ‘INST’ objective.</i></li> </ul>
<p>vi) Two submissions are made in relation to the Irish Glass Bottle site, Goatstown. The following issues are raised:</p> <ul style="list-style-type: none"> <li>• Submission welcomes the retention of the F zoning objectives and requests that the site be</li> </ul>	<p><b>B0529</b> <b>B1066</b></p>	<p>The Executive notes the issues raised and welcomes the support provided.</p> <p>There are no proposals to remove the ‘ED’ symbol on the lands to allow for the provision of a future school. It is not, however, considered appropriate to apply the zoning objective ‘SNI’ to this site as it does not meet the criteria for SNI zoning set out below.</p>

Issues	Sub. No.	Executive’s Response & Recommendation
<p>used for education and associated recreation that is accessible for use by the local community</p> <ul style="list-style-type: none"> <li>• Another submission from the Department of Education requests a rezoning from F to SNI. Under current zoning education is only open for consideration as opposed to permitted in principle. There is also a restriction in relation to built footprint (confined to 40% of the site with the remaining 60% to be used as public open space) which it is considered would create issues in relation to access.</li> <li>• Request the retention of the ED symbol on the Irish Glass Bottles Site</li> <li>• Submission states that school facilities on the IGB site, would be made available to the wider community outside of school hours and that arrangement can be made to allow access. The Department also state that they are willing to explore the provision, in conjunction with the local authority, of outdoor sports and recreational facilities on a portion of this site which would be made accessible to the public outside school hours.</li> </ul>		<p>The Draft Plan introduces a new land use zoning objective – SNI – “<i>To protect, improve and encourage the provision of sustainable neighbourhood infrastructure</i>”. This new land use zoning, Objective SNI, has been applied to:</p> <ul style="list-style-type: none"> <li>• land parcels that contain existing SNI facilities together with its associated amenity / recreational space, e.g. schools, community facilities, places of worship and their associated parish / cultural centres, health care facilities.</li> <li>• lands zoned objective ‘MH’ in the current 2016-2022 plan, and that contain an existing health care facility, have also been zoned Objective SNI.</li> <li>• Lands with an extant planning permission for a new SNI facility – as in the case with lands in Ballyogan where a new school has been permitted.</li> </ul> <p>The SNI land use zoning objectives seek to protect or improve existing SNI facilities / uses and identifies existing facilities. An aim of the SNI zoning objectives are to ensure that both existing and emerging residential areas are provided with and can continue to be served by an adequate level and an appropriate range of supporting social and community infrastructure.</p> <p>At present the Irish Glass Bottles site neither contains an existing SNI facilities, nor has permission been granted for a SNI facility within this land parcel. Permission for a school was applied for under Reg. Ref. D20A/0268 on part of the lands, however, this application was withdrawn by the applicant while on appeal. Under land use zoning objective F educational uses are open for consideration subject to caveat whereby not more than 40% of the site can be developed).</p> <p>The SNI land use zoning may be expanded upon through the future review of the County Development Plan as new SNI facilities are delivered and/or permitted.</p> <p>With regard to the use of the site outside of school hours, proposals for such usage would be assessed through the development management process. The Draft Plan encourages the dual use of school sites through Policy Objective PHP7: Schools, in Chapter 4 and its supporting development management guidance in Section 12.3.2.5 ‘Schools’ in Chapter 12.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Executive's Response & Recommendation
		No change to Draft Plan.
vii) Submission requests that the A zoning is retained at the Taney Tennis grounds.	<b><u>B0965</u></b>	<p>The Executive notes the issue raised. The Draft Plan does not propose any change to the zoning of these lands.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
viii) Submission requests the re-zoning of lands at the Frankfort Centre, Dundrum Road from Objective 'NC' to Objective 'A'.	<b><u>B1037</u></b>	<p>The Executive does not agree with the submission.</p> <p>It is considered that the wide range of uses and flexibility that the existing 'NC' zoning provides for is appropriate at the subject site. The re-zoning request would serve to significantly reduce the range of uses considered 'permitted in principle' at the site. It is considered that the subject lands are strategically located for the purpose of their existing 'NC' zoning objective and have a role in the provision of mixed-use neighbourhood centre facilities to support both the existing and future community in the northern Dundrum area.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
ix) Submission notes that a portion of the roadway at Waldemar Terrace, Dundrum is zoned MTC, while the balance is not. Request that Council confirm the intent in this regard.	<b><u>B1072</u></b>	<p>The Executive notes the issue raised and acknowledge that this is an anomaly.</p> <p><b>Recommendation</b> Amend Map 1 to remove the MTC zoning from the roadway to the north west of Waldemar Terrace, Dundrum</p>
<p>x) Half of a property in Dundrum is zoned Objective MTC on Land Use Zoning Map 1 in line with adjoining properties while the remainder is zoned Objective A</p> <p>Request a rezoning to MTC as current zoning may be an anomaly.</p>	<b><u>B1204</u></b>	<p>The Executive notes the issue raised.</p> <p>The site in question is one of a number of residential properties accessed from a small laneway to the north of the garage site on the Dundrum Road. Land use zoning objectives do not necessarily follow property or ownership boundaries and therefore two land use zoning objectives can cross one property or a number of properties. In this instance the MTC zoning runs in a straight line east from the Luas line to the river before moving slightly northwards. It is not considered that there is a planning rationale to extend the MTC land use zoning objective at this location.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Executive’s Response & Recommendation
<b>3.31.2: Map 2</b>		
<p>i) Submission requests that the area known as Mullens Field and additional open space areas serving the area, are retained as public open space and F zoned lands. Submission notes various reasons for retaining the open space including:</p> <ul style="list-style-type: none"> <li>• It has been a park since the 1950’s and was transferred to the Council in the 1980’s.</li> <li>• It is an essential part of green infrastructure and provides feeding areas for wildlife such as Brent geese, bats, snipe, and badgers.</li> <li>• Stillorgan / Sandyford is already overdeveloped.</li> <li>• There is a need for adequate green space.</li> <li>• Housing crisis should not put pressure on green spaces.</li> <li>• The green space requires investment to improve upon it.</li> <li>• Development at this location would increase traffic hazard.</li> </ul>	<p><u><b>B0012</b></u> <u><b>B0550</b></u>  <u><b>B0323</b></u> <u><b>B0564</b></u>  <u><b>B0344</b></u> <u><b>B0571</b></u>  <u><b>B0358</b></u> <u><b>B0572</b></u>  <u><b>B0365</b></u> <u><b>B0575</b></u>  <u><b>B0368</b></u> <u><b>B0579</b></u>  <u><b>B0369</b></u> <u><b>B0597</b></u>  <u><b>B0370</b></u> <u><b>B0606</b></u>  <u><b>B0371</b></u> <u><b>B0610</b></u>  <u><b>B0372</b></u> <u><b>B0641</b></u>  <u><b>B0373</b></u> <u><b>B0644</b></u>  <u><b>B0374</b></u> <u><b>B0645</b></u>  <u><b>B0375</b></u> <u><b>B0657</b></u>  <u><b>B0388</b></u> <u><b>B0664</b></u>  <u><b>B0389</b></u> <u><b>B0667</b></u>  <u><b>B0390</b></u> <u><b>B0678</b></u>  <u><b>B0404</b></u> <u><b>B0679</b></u>  <u><b>B0431</b></u> <u><b>B0704</b></u>  <u><b>B0447</b></u> <u><b>B0734</b></u>  <u><b>B0451</b></u> <u><b>B0736</b></u>  <u><b>B0452</b></u> <u><b>B0742</b></u>  <u><b>B0453</b></u> <u><b>B0803</b></u>  <u><b>B0458</b></u> <u><b>B0820</b></u>  <u><b>B0462</b></u> <u><b>B0822</b></u>  <u><b>B0463</b></u> <u><b>B0899</b></u>  <u><b>B0472</b></u> <u><b>B0912</b></u>  <u><b>B0494</b></u> <u><b>B0922</b></u>  <u><b>B0523</b></u> <u><b>B0934</b></u>  <u><b>B0527</b></u> <u><b>B1076</b></u>  <u><b>B0535</b></u> <u><b>B1101</b></u>  <u><b>B0536</b></u> <u><b>B1136</b></u>  <u><b>B0545</b></u> <u><b>B1141</b></u>  <u><b>B0546</b></u> <u><b>B1172</b></u></p>	<p>The Executive notes the issue raised.</p> <p>The areas in question are maintained by the Council’s Parks Department. The Property Management section has confirmed that these areas are not owned by DLR.</p> <p>The open space areas in question are zoned Objective F – “To preserve and provide for open space with ancillary active recreational amenities.”</p> <p>It is not intended to change the land use zoning objective of these areas, therefore the ‘F’ zoning objective will be retained in the Draft Plan.</p> <p><b>Recommendation</b>  No change to Draft Plan.</p>

Issues	Sub. No.	Executive's Response & Recommendation
ii) Submission requests the re-zoning of a site located at Deerpark Road from Objective 'NC' to Objective 'A'.	<b><u>B0974</u></b>	<p>The Executive does not agree with the submission.</p> <p>Planning permission was granted at the site for a mixed-use scheme primarily comprising 48 residential dwelling units in addition to four ground floor office units (Ref. D15A/0121). It is noted that this scheme is currently under construction. The site is immediately abutted to the east and west by lands also zoned NC - <i>"to protect and provide for mixed use neighbourhood centre facilities"</i>. There is also NC lands to the South. The argument but forward by the submitter that the A land use zoning would better reflect the permitted use is not plausible as firstly residential is a use that is permitted in the NC zone. Secondly, within the A land use zoning objective only offices of less than 200 sq m are permissible. The permitted offices are circa 300 sq metres. In this instance, both uses – offices and residential are important in supporting the concept of a mix of sustainable uses in the neighbourhood centre.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
iii) Submission requests that boundary of the Blackrock Local Area Plan (LAP) as shown on Map 2 of the Draft Plan is extended around the A zoned lands at the north west corner of Frascatti Shopping Centre to match that of the approved LAP.	<b><u>B1041</u></b>	<p>The Executive agrees with the issue raised.</p> <p>There appears to be an anomaly on Map 2 of the Draft Plan in that the boundary of the LAP does not align with the approved boundary on map 5 of the Blackrock Local Area Plan, 2015.</p> <p><b>Recommendation</b> <b>Amend Map 2 to align with the boundary of the approved Blackrock LAP.</b></p>
iv) Submission requests the rezoning of the lands in the northern section of lands (next to tree symbol adjoining Frascati Road) from A to DC as this would address an anomaly at the corner of the site.	<b><u>B1041</u></b>	<p>The Executive notes the issue raised, however does not agree with this change in zoning.</p> <p>The land area in question contains a copse of mature trees located to the north west of the vehicular access point serving the Frascati Shopping Centre. The existing trees are set behind a wall and read as part of the residential scheme at Lisalea. Between the wall and vehicular access area is a footpath and landscaped area forming part of the public realm around the junction at the northern end of the shopping centre.</p> <p>Map 2 of the Draft Plan include an objective <i>"To protect and preserve Trees and woodlands"</i> at this location.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>The area is requested to be re-zoned from objective 'A' - <i>"To provide residential development and/or protect and improve residential amenity"</i> to 'DC' – <i>"To protect, provide for and/or improve mixed-use district centre facilities"</i>.</p> <p>The area does not function as a district centre, rather, it provides a planted buffer between the current district centre uses within the shopping centre, and the existing residential scheme at Lisalea. It is considered that this area is appropriately zoned as objective 'A' as it serves to 'protect' the residential amenities of Lisalea.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>v) Submission from the Department of Education requests that consideration is given to the zoning of lands at the Mount Anville Depot for a school to accommodate Gaelscoil Laighean which is currently temporarily located in Deansgrange.</p>	<p><b><u>B1066</u></b></p>	<p>The Executive notes the issue raised.</p> <p>The land use zoning objective of the former Mount Anville Depot is Objective 'A' - <i>"To provide residential development and/or protect and improve residential amenity"</i>. As per Table 13.1.2 in Chapter 13: 'Land Use Zoning' in the Draft Plan, 'education' is permitted in principle within lands zoned objective 'A.' It is, therefore, not considered necessary to rezone this site in order to facilitate a school.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>vi) Submission requests that S2S should be shown on each of the relevant Plan Maps.</p>	<p><b><u>B1200</u></b></p>	<p>The Executive note the issue raised.</p> <p>Maps 2, 3 and 4 include a dashed green line along the coast to illustrate the indicative route for the "proposed Sutton to Sandycove Walkway/Cycleway as a component part of the National East Coast Tail Cycle Route".</p> <p>In addition to the indicative route, each map contains Specific Local Objective (SLO) 18 which states: <i>"To promote the development of the Dublin Bay Trail as a component part of the National East Coast Trail Cycle Route up to the boundary with Co. Wicklow. Any development proposals shall be subject to Appropriate Assessment Screening in accordance with the requirements of the EU Habitats Directive to ensure the protection and preservation of all designated SACs, SPAs, and pNHA(s) in Dublin Bay and the surrounding area."</i></p>

Issues	Sub. No.	Executive’s Response & Recommendation
		<p>As already set out under Section 3.5: ‘Chapter 5 – Transport and Mobility’ of this Chief Executives report, it is recommended to update the wording of SLO 18.</p> <p><b>Recommendation</b> Amend Specific Local Objective (SLO) 18 in Maps 2, 3, 4, 7, 10 and 14 in Chapter 14 from:</p> <p><i>“To promote the development of the Dublin Bay Trail as a component part of the National East Coast Trail Cycle Route up to the boundary with Co. Wicklow. Any development proposals shall be subject to Appropriate Assessment Screening in accordance with the requirements of the EU Habitats Directive to ensure the protection and preservation of all designated SACs, SPAs, and pNHA(s) in Dublin Bay and the surrounding area.”</i></p> <p>To:</p> <p><i>“To promote the development of the <del>Dublin Bay Trail</del> <u>Sutton to Sandycove Promenade and Cycleway</u>, as a component part of the National East Coast Trail Cycle Route <u>and also the Dublin Bay trail from the boundary with Dublin City up to the boundary with Co. Wicklow</u>. Any development proposals shall be subject to Appropriate Assessment Screening in accordance with the requirements of the EU Habitats Directive to ensure the protection and preservation of all designated SACs, SPAs, and pNHA(s) in Dublin Bay and the surrounding area”.</i></p>
<b>3.31.3: Map 3</b>		
<p>i) Submissions received in relation to the sports field on Tivoli Terrace South:</p> <ul style="list-style-type: none"> <li>• Seek the retention of the recreational zoning (F) and requests that lands remain accessible to the local community.</li> <li>• Requests rezoning of site from F to SNI.</li> <li>• Request the addition of the following SLO: <i>“Any future development proposals contained within lands zoned objective ‘SNI’, and which immediately abut residentially-zoned land, shall clearly demonstrate that the residential amenities of the neighbouring properties will</i></li> </ul>	<p><b><u>B0054</u></b> <b><u>B0067</u></b> <b><u>B0075</u></b> <b><u>B0081</u></b> <b><u>B0094</u></b> <b><u>B0524</u></b> <b><u>B0987</u></b> <b><u>B1148</u></b> <b><u>B1201</u></b> <b><u>B1203</u></b></p>	<p>The Executive notes the issues raised.</p> <p>This site located at Tivoli Terrace South is zoned Objective ‘F’ – <i>“To preserve and provide for open space with ancillary active recreational amenities.”</i></p> <p>The Draft Plan introduces a new land use zoning objective – SNI – <i>“To protect, improve and encourage the provision of sustainable neighbourhood infrastructure”</i>. This new land use zoning, Objective SNI, has been applied to:</p> <ul style="list-style-type: none"> <li>• land parcels that contain existing SNI facilities together with its associated amenity / recreational space, e.g. schools, community facilities, places of worship and their associated parish / cultural centres, health care facilities.</li> </ul>

Issues	Sub. No.	Executive’s Response & Recommendation
<p><i>be respected and protected through sensitive design with reference to height and scale and including the provision of appropriate boundary landscaping and considered boundary treatments”.</i></p>		<ul style="list-style-type: none"> <li>• lands zoned objective ‘MH’ in the current 2016-2022 plan have also been zoned Objective SNI.</li> <li>• Lands with an extant planning permission for a new SNI facility – as in the case with lands in Ballyogan where a new school has been permitted.</li> </ul> <p>In addition to the land use zoning objective, specific local objectives (SLO) have been applied to existing SNI facilities located on sites within either existing mixed use zoning objectives in town centre locations e.g. Major Town Centres (MTC) where a range of uses are already permitted in principle, and on land use zoning objectives where there are more restrictive objectives and greater protection of existing facilities, e.g. on as lands zoned ‘F’.</p> <p>These specific local objectives are:</p> <ul style="list-style-type: none"> <li>• SLO 10 – which is applied to individual SNI facilities and states: <i>“To retain, improve and encourage the provision of sustainable neighbourhood infrastructure”</i></li> <li>• SLO 22 – which is outlined and is applied to a group/cluster of adjoining facilities or a larger land parcel continuing a SNI facility and states: <i>“To retain, improve and encourage the provision of sustainable neighbourhood infrastructure facilities within the outlined group of building / land.”</i></li> </ul> <p>The SNI land use zoning objectives seek to protect or improve existing SNI facilities / uses and identifies existing facilities. An aim of the SNI zoning objectives are to ensure that both existing and emerging residential areas are provided with and can continue to be served by an adequate level and an appropriate range of supporting social and community infrastructure.</p> <p>The lands in question neither contain an existing SNI facility or use, nor do they have permission granted for a SNI use or facility. In this regard, the lands in question are not considered to meet the criteria for the application of the SNI land use zoning objective.</p> <p>It is not intended to change the land use zoning objective of these areas, therefore the ‘F’ zoning objective will be retained in the Draft Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>ii) Submission requests that the private lane to the rear of nos. 11-13 Tivoli Terrace North and to the side of the rear garden of no 11 is not included as part of the sports ground and zoned F</p>	<p><b>B0094</b></p>	<p>The Executive notes the issue raised.</p> <p>Land use zoning objectives can cross property boundaries as ownership of any site is not a Development Plan matter.</p> <p>The lane way in question serves as an access to the rear of residential properties and does not serve or form part of the former sports ground. The application of 'F' zoned lands along the lane way in question does not purport to it forming part of adjoining uses / lands.</p> <p>Section 13.1.7 'Non-Conforming Uses' in Chapter 13 states: <i>"Throughout the County there are uses which do not conform to the zoning objective for the area. All such uses, where legally established (the appointed day being 1 October 1964) or were in existence longer than 7 years, shall not be subject to proceedings under the Act in respect of continuing use. When extensions to, or improvements of, premises accommodating such uses are proposed, each shall be considered on their merits, and permission may be granted where the proposed development does not adversely affect the amenities of premises in the vicinity and does not prejudice the proper planning and sustainable development of the area."</i></p> <p>The lane way subject Having regard to the function of the lane and the provisions of Section 13.1.7 in the Draft Plan, it is not considered necessary to change the zoning objective of the laneway.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) The submission suggests that the following lands adjoining the Stradbroke stream should be zoned for Open Space:</p> <ul style="list-style-type: none"> <li>● North side of Dalguise estate.</li> <li>● North side of former Cheshire Home grounds.</li> <li>● South Side of Glensilva grounds.</li> <li>● Both banks of the stream at Alma Place</li> </ul>	<p><b>B0350</b></p>	<p>The Executive notes the issues raised.</p> <p>Policy Objective GIB24: 'Rivers and Waterways' in Chapter 8 of the Draft Plan states: <i>"It is a Policy Objective to maintain and protect the natural character and ecological value of the river and stream corridors in the County and where possible to enhance existing channels and to encourage diversity of habitat and nature-based solutions that incorporate biodiversity features. It is also policy (subject to the sensitivity of the riverside habitat), to provide public access to riparian corridors, to promote improved passive recreational activities"</i>.</p>

Issues	Sub. No.	Executive’s Response & Recommendation
		<p>Policy Objective GIB24 sets out a number of requirements to be taken into consideration in development proposals in riparian corridors, including “<i>where practicable, they:</i></p> <ul style="list-style-type: none"> <li>• <i>Dedicate a minimum of 10m each side of the water’s edge for amenity and biodiversity and up to 30m for areas where the ecosystem functioning of the catchment requires it, (where practicable).</i></li> <li>• <i>Ensure no development - including clearance and storage of materials – takes place within a minimum distance of 10m measured from each top of bank of any river, stream, or watercourse, (where practical).</i></li> <li>• <i>Preserve the biodiversity of the site.</i></li> <li>• <i>Involve no land filling, diverting, culverting or re – alignment of river or stream corridors.</i></li> <li>• <i>Have no negative effects on the distinctive character and appearance of the waterway corridor and/or the characteristic and landscape elements of the specific site and its context.</i></li> <li>• <i>Do not impact on riparian corridors and wetland sites within river/stream catchments, which provide an important function in terms of regulating the flow of water in these catchments, and often support habitats and species of high nature conservation value.</i></li> <li>• <i>Take cognisance of any adverse impacts on the populations of protected species, including protected flora, otters, and bats.”.</i></li> </ul> <p>Having regard to the provisions of Policy Objective GIB24, and other biodiversity related Policy Objectives in Chapter 8, it is considered that the Draft Plan already provides adequate protection to the biodiversity of lands adjoining waterways in the County. It is therefore, not considered necessary to rezone lands adjoining Stradbroom stream.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Submission requests that the northeast corner of Carrickbrennan Lawn should be zoned for Open Space.</p>	<p><b><u>B0350</u></b></p>	<p>The Executive notes the issue raised.</p> <p>The northeast area of Carrickbrennan Lawn, at the junction of Richmond Hill and Carrickbrennan Road, consist of an area of green space that contains a number of mature trees. This green space continues along the east of Carrickbrennan Lawn between Carrickbrennan Road existing dwellings.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>On Map 3 of the Draft Plan, the area is zoned objective 'A' – "To provide residential development and/or protect and improve residential amenity" and northeast corner has an objective "to protect and preserve Trees and Woodlands."</p> <p>The lands in question are maintained by DLR Parks, however, the lands are not owned by the Council.</p> <p>The green area at the northeast corner as per the issues raised, and the linear green area that extends from this space, functions as open space. In this regard, it is considered appropriate to rezone these green, open space lands to objective 'F' – "To preserve and provide for open space with ancillary active recreational amenities".</p> <p><b>Recommendation</b> Amend map 3 to change the open space at the northeast area of Carrickbrennan Lawn, at the junction of Richmond Hill and Carrickbrennan Road and the linear extension of same along Carrickbrennan Road, from 'A' to 'F'.</p>
v) Submission requests that Seafort Lodge on Castledawson Avenue, Blackrock, is rezoned from A to SNI in order to provide hospital and medical uses and facilities to allow further expansion of the clinic and hospital.	<b><u>B0517</u></b>	<p>The Executive notes the issues raised and recommends that the site in question at the Blackrock Clinic be rezoned from A to SNI in order to provide hospital and medical uses and facilities to allow further expansion of the clinic and hospital.</p> <p><b>Recommendation</b> Amend Map 3 to rezone Seafort Lodge, Blackrock Clinic from 'A' to 'SNI'.</p>
vi) Requests the rezoning of lands at Brookfield Avenue, Blackrock from Objective 'E' to Objective 'A', in order to facilitate the redevelopment of the lands for residential.	<b><u>B0562</u></b>	<p>The Executive does not agree with the issue raised.</p> <p>Blackrock is an important employment centre in the County, as acknowledged in Sections 6.3.1 'DLR Employment Profile' and 6.3.2 'Sectoral and Land Use Trends' of the Draft Plan. The Local Authority supports the continued role and enhancement of Blackrock as an employment node within the County.</p> <p>The overarching Employment Strategy for DLR is set out in Section 2.4.8.5 of the Draft Plan.</p> <p><i>'In spatial terms, the DLR employment strategy aims to provide for the expansion of employment through the designation of a range of sustainable employment locations. The</i></p>

Issues	Sub. No.	Executive’s Response & Recommendation
		<p><i>spatial strategy applies the principles of the circular economy to land-use management through the <u>intensification and redevelopment of existing strategic employment areas within the M50 ring</u> and the activation of key strategic sites such as Cherrywood and Carrickmines which are accessible to public transport. The strategy seeks to <u>align strategic employment locations with existing and identified residential growth areas through high frequency transport and minimise the divergence between the places people live and work, increasing the efficiency of land-use, reducing sprawl and minimising carbon footprint.</u></i></p> <p>It is considered that the subject Objective ‘E’ zoned lands support the overarching principles of the Employment Strategy for the County and represent a spatially preferable location for employment use.</p> <p>Section 2.4.8.4 of the Draft Plan provides an evidence-based analysis to estimate the requirement for employment zoned lands in the County. The analysis found that while there was a sufficient quantum of employment zoned lands available to facilitate continued economic development and employment growth in the County over the Plan period, that the extent of the employment landbank in DLR was quite low in comparison to adjoining Counties in the MASP area and as such, there is an enhanced need to retain and protect these lands for employment purposes.</p> <p>The Executive supports the retention and protection of the subject lands for continued employment use.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>vii) Requests the re-zoning of a small portion of land at the Cluain Mhuire Family Centre, Newtownpark Avenue from Objective ‘SNI’ to Objective ‘A’. The area forms part of a residential proposal at the site and will no longer be part of the operation of the Cluain Mhuire Family Centre.</p> <p>Submission also requests the removal of a tree preservation objective from the site.</p>	<p><b>B0931</b></p>	<p>The Executive notes the issues raised.</p> <p>The Draft Plan introduces a new land use zoning objective – SNI – “<i>To protect, improve and encourage the provision of sustainable neighbourhood infrastructure</i>”. This new land use zoning, Objective SNI, has been applied to:</p> <ul style="list-style-type: none"> <li>land parcels that contain existing SNI facilities together with its associated amenity / recreational space, e.g. schools, community facilities, places of worship and their associated parish / cultural centres, health care facilities.</li> </ul>

Issues	Sub. No.	Executive’s Response & Recommendation
		<ul style="list-style-type: none"> <li>• lands zoned objective ‘MH’ in the current 2016-2022 plan have also been zoned Objective SNI.</li> <li>• Lands with an extant planning permission for a new SNI facility – as in the case with lands in Ballyogan where a new school has been permitted.</li> </ul> <p>The SNI land use zoning objective seeks to protect or improve existing SNI facilities / uses and identifies existing facilities. An aim of the SNI zoning objectives are to ensure that both existing and emerging residential areas are provided with and can continue to be served by an adequate level and an appropriate range of supporting social and community infrastructure.</p> <p>In order to determine which lands and/or facilities are associated with the primary SNI use, boundaries used in planning histories have been reviewed and have been used in the application of the SNI zoning objective.</p> <p>The portion of land subject of re-zoning contains a shed that appears to be associated with Cluain Mhuire which is the existing ‘SNI’ facility. The portion of land upon which the shed sits forms part of the site area for a recently granted residential scheme Reg. Ref. ABP30894620, which includes for the demolition of this shed. There is, however, a separate, concurrent permission for the same lands to the side/rear of Cluain Mhuire for a residential scheme, the life of which was recently extended under Reg. Ref. D15A/0036/E. The boundary of this permission excluded the shed.</p> <p>It is as yet unknown which permission will be enacted. The retention of the ‘SNI’ zoning objective on the lands where the shed is located will not prevent the permission under either permission from being commenced. In this regard, it is considered appropriate to retain the ‘SNI’ zoning at this location.</p> <p>It is not considered appropriate to remove the objective <i>“to protect and preserve trees and woodlands”</i> from the site. Notwithstanding the argument put forward that the removal of the tree forms part of the extant planning permission at the site, it is considered that the trees and woodlands objective should be maintained until such time that a planning permission is implemented. There is a significant copse of trees on site, the value of which would be assessed during the development management process having regard to the</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>relevant Policy Objectives in the Draft Plan, including Policy Objective OSR7: 'Trees, Woodland and Forestry.' The retention of the tree symbol would not prevent the commencement of either permission already granted on site.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>viii) Submission requests retention of current A land use zoning objectives on site (SNI to A) of Tower Green and Clareville, on Cross Avenue, Blackrock. Submission states that the site was never used for educational purposes.</p>	<p><b>B0944</b></p>	<p>The Executive notes the issue raised.</p> <p>The Draft Plan introduces a new land use zoning objective – SNI – “<i>To protect, improve and encourage the provision of sustainable neighbourhood infrastructure</i>”. This new land use zoning, Objective SNI, has been applied to:</p> <ul style="list-style-type: none"> <li>• land parcels that contain existing SNI facilities together with its associated amenity / recreational space, e.g. schools, community facilities, places of worship and their associated parish / cultural centres, health care facilities.</li> <li>• lands zoned objective 'MH' in the current 2016-2022 plan have also been zoned Objective SNI.</li> <li>• Lands with an extant planning permission for a new SNI facility – as in the case with lands in Ballyogan where a new school has been permitted.</li> </ul> <p>The SNI land use zoning objective seeks to protect or improve existing SNI facilities / uses and identifies existing facilities. An aim of the SNI zoning objectives are to ensure that both existing and emerging residential areas are provided with and can continue to be served by an adequate level and an appropriate range of supporting social and community infrastructure.</p> <p>The lands subject of the issue raised are located on the northern side of Cross Avenue. The property known as 'Tower Green' is located within its own curtilage and has an independent access point off Cross Avenue. The property known as 'Clareville' consists of 2no. buildings located within, and accessed from, the overall campus of Blackrock College / Willow Park School. There is a large green area to the east of 'Clareville' located along a vehicular access road to Blackrock College and there is a hard surfaced 'basketball' pitch (appears to be disused) to the north of 'Clareville'. At present, 'Clareville' and the green area are separated from the access road by temporary Harris type fencing.</p>

Issues	Sub. No.	Executive’s Response & Recommendation
		<p>In order to determine which lands and/or facilities are associated with the primary SNI use, boundaries used in planning histories have been reviewed and have been used in the application of the SNI zoning objective.</p> <p>The last independent planning history located for ‘Tower Green’ dates from 1984 (Reg. Ref. 622/84) and was for an extension to the existing ‘dwelling’. A subsequent application for development at ‘Tower Green’ was made in 1988 (Reg. Ref. 435/88) for the redevelopment of ‘Clareville’ for a priest’s house with a link to ‘Tower Green’. This was superseded in 1990 (Reg. Ref. 139/90) with an application for 2no. accommodation buildings <i>“for use by the congregation and college staff.”</i> This application included a covered link from ‘Clareville’ to a gate in the boundary wall with ‘Tower Green’ rather than a direct link between the buildings. ‘Tower Green’ retained its boundary with the College campus.</p> <p>A number of subsequent planning applications for development at Blackrock College have consistently included ‘Clareville’, the large green space and pitches to the rear, within the boundary of the campus.</p> <p>Having regard to planning history for the Blackrock College Campus, it is considered that ‘Clareville’, the green space and pitches have been intrinsically linked and directly associated with the College as accommodation for congregation and staff members and is therefore an intrinsic part of the educational function of the campus. The large green area would have been open to the access road serving the College, as such, it would appear that this space would have been available as passive recreational amenity space within the college campus.</p> <p>Given that ‘Tower Green’ is independent from the overall Blackrock College campus and there is planning history in relation to this property citing it as a ‘dwelling’, it is considered reasonable to rezone the lands within the boundary of ‘Tower Green’ from SNI to A, however, given that ‘Clareville’ the green area and pitches have had a direct link with the College, it is considered that these areas, with uses directly associated with the educational function of the overall campus should remain zoned ‘SNI’.</p> <p>As set out in Table 13.1.7 (pg. 306), Chapter 13 of the Draft Plan, a number of uses are both permitted in principle and open for consideration under the land use zoning Objective SNI – “To protect, improve and encourage the provision of sustainable neighbourhood</p>

Issues	Sub. No.	Executive’s Response & Recommendation
		<p>infrastructure.” Uses include ‘Education’ being permitted in principle and ‘Residential’ being open for consideration.</p> <p>It is acknowledged that there will be sites in the County subject to the SNI zoning objective that may be capable of accommodating other forms of development whilst still protecting existing SNI facilities and the recreational value of such sites. All proposed development on lands zoned SNI will be subject to compliance with the requirements of Section 12.3.2.1 ‘Development within Sustainable Neighbourhood Infrastructure Lands.’ It is not considered appropriate to identify SNI sites or parameters that render a site suitable for development, rather, this will be assessed through the development management process.</p> <p>In formulating this response the Executive have in accordance with section 12 (8) (b) (iii) of the Planning and Development Act, 2000, (as amended) taken account of the strategic direction received from the members at pre-draft stage <i>“To request that the Chief Executive enhance the existing County Development Plan policies in regard to the protection of recreational and community spaces and infrastructure including areas currently with an INST objective”</i>.</p> <p><b>Recommendation</b>  Amend Map 2 to change the zoning at ‘Tower Green’, Cross Avenue, from ‘SNI’ to ‘A’.</p>
<p>ix) Submission requests that Silchester Park field is rezoned for recreational use.</p>	<p><b><u>B0098</u></b>  <b><u>B0099</u></b>  <b><u>B0272</u></b>  <b><u>B0395</u></b>  <b><u>B0738</u></b>  <b><u>B1089</u></b></p>	<p>The Executive notes the issue raised.</p> <p>The lands in question are entirely surrounded by dwelling at Silchester Park and is accessed via a gated pedestrian entrance point to the south of the lands.</p> <p>The Property Management section of the Council have confirmed that DLR have no interest in these lands and it is not maintained by the Council.</p> <p>These lands function as open recreational space and whilst they are not open to the general public for use, they do meet the definition for open space. As such, it is considered that the application of objective ‘F’ – <i>“To preserve and provide for open space with ancillary active recreational amenities”</i> is appropriate at this location.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>x) Submission requests that the rezoning of Bullock Harbour in the last plan is reversed.</p>	<p><b><u>B0102</u></b></p>	<p><b>Amend Maps 3 and 7 to rezone the open space area located at Silchester Park from 'A' to 'F'.</b></p> <p>The Executive notes the issue raised.</p> <p>There was no rezoning of the lands at Bullock Harbour in the current 2016 - 2022 Plan and there is no proposal in the Draft Plan to alter the zoning at Bullock harbour. The 2010 – 2016, 2016 – 2022 and the Draft 2022 – 2028 DLR County Development Plan all show the same W zoning land use objective pertaining to lands at Bullock Harbour. See also Section 3.14 SLOs and Section 3.13 Chapter 13 for further responses pertaining to Bullock Harbour.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xi) Submission supports the F zone on the Blackrock RFC grounds at Stradbroom and requests that this be retained.</p>	<p><b><u>B0385</u></b> <b><u>B0402</u></b> <b><u>B0403</u></b></p>	<p>The Executive notes the issue raised. There is no proposal in the Draft Plan to rezone this site.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xii) Request that Monkstown Lawn Tennis club is rezoned from A to F</p>	<p><b><u>B0859</u></b> <b><u>B0946</u></b> <b><u>B1259</u></b> <b><u>B1260</u></b></p>	<p>The Executive agrees with the rezoning requested.</p> <p>Having reviewed the planning history for the area in question, the existing and established use is that of a tennis club. There is an existing club house and courts onsite that are in active use. It is therefore considered that the lands function as an active recreational use.</p> <p>Having regard to the function of the lands, it is considered appropriate to re-zone the tennis club, including its club house, as 'F' – <i>“To preserve and provide for open space with ancillary active recreational amenities”</i>.</p> <p><b>Recommendation</b> <b>Amend Map 3 to rezone lands at Monkstown Lawn Tennis club from 'A' to 'F'.</b></p>
<p>xiii) Requests the re-zoning of an identified creche site at Cualanor from Objective 'F' to Objective 'A', in order to reflect the approved use of the site and ensure the future development of a creche would be in line with the County Development Plan.</p>	<p><b><u>B0880</u></b></p>	<p>The Executive notes the issue raised.</p> <p>Planning permission was granted for the subject creche in 2009 – as part of the wider Cualanor development - yet to date the facility has not commenced development. The submission notes that the current permission for the scheme is due to expire in August 2022 and a new permission will need to be secured at the site for the creche.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>Under the existing zoning Objective 'F' the land use 'Childcare Service' is Open for Consideration in existing premises. It is acknowledged that there is no existing childcare service premises at the subject site.</p> <p>While the Local Authority supports the provision of a creche at the subject site, it is equally not considered necessary or justified to re-zone the site Objective 'A'. In order to facilitate the provision of a creche facility at the site the Executive recommends the inclusion of a Specific Local Objective with respect to same.</p> <p><b>Recommendation</b>  Amend Land Use Map 3 to include a new Specific Local Objective at the subject site.  Incorporate a new Specific Local Objective in Chapter 14 'Specific Local Objectives' under Map 3 – Monkstown / Dún Laoghaire – to read as follows:  <i>'To support and facilitate the provision of a creche.'</i></p>
<p>xiv) Submissions relate to CBC Monkstown and consider the SNI rezoning appropriate for the school and ancillary playing pitches but not for the 0.34 hectares which is suited to infill development. It is request that the A zoning for portion of the site is reinstated.</p>	<p><b>B0925</b>  <b>B0943</b>  <b>B1238</b></p>	<p>The Executive notes the issue raised but disagrees with the requested rezoning from 'SNI' to 'A'.</p> <p>The Draft Plan introduces a new land use zoning objective – SNI – <i>"To protect, improve and encourage the provision of sustainable neighbourhood infrastructure"</i>. This new land use zoning, Objective SNI, has been applied to:</p> <ul style="list-style-type: none"> <li>land parcels that contain existing SNI facilities together with its associated amenity / recreational space, e.g. schools, community facilities, places of worship and their associated parish / cultural centres, health care facilities.</li> <li>lands zoned objective 'MH' in the current 2016-2022 plan have also been zoned Objective SNI.</li> <li>Lands with an extant planning permission for a new SNI facility – as in the case with lands in Ballyogan where a new school has been permitted.</li> </ul> <p>The SNI land use zoning objective seeks to protect or improve existing SNI facilities / uses and identifies existing facilities. An aim of the SNI zoning objectives are to ensure that both existing and emerging residential areas are provided with and can continue to be served by</p>

Issues	Sub. No.	Executive’s Response & Recommendation
		<p>an adequate level and an appropriate range of supporting social and community infrastructure.</p> <p>In order to determine which lands and/or facilities are associated with the primary SNI use, boundaries used in planning histories have been reviewed and have been used in the application of the SNI zoning objective.</p> <p>The land parcel sought to be rezoned to 'A' is located in the northern portion of the school campus, adjacent to Pakenham. The area in question, while at a remove from the school building, is a green area forming part of the wider school campus and would appear to form part of the recreational amenity space of the school. Planning history, including a recent application (Reg. Ref. D21A/0298) includes this portion of the schools grounds within the boundary associated with the campus.</p> <p>There is no planning history with regard to any use other than that linked with the educational function of the campus.</p> <p>Given that the green area has had a direct link with the school, it is considered that this land parcel, with an amenity function directly associated with the educational function of the overall campus should remain zoned 'SNI'. <b>The ownership and/or sale of lands is not a County Development Plan matter.</b></p> <p>As set out in Table 13.1.7 (pg. 306), Chapter 13 of the Draft Plan, a number of uses are both permitted in principle and open for consideration under the land use zoning Objective SNI – “To protect, improve and encourage the provision of sustainable neighbourhood infrastructure.” Uses include ‘Education’ being permitted in principle and ‘Residential’ being open for consideration.</p> <p>It is acknowledged that there will be sites in the County subject to the SNI zoning objective that may be capable of accommodating other forms of development whilst still protecting existing SNI facilities and the recreational value of such sites. All proposed development on lands zoned SNI will be subject to compliance with the requirements of Section 12.3.2.1 ‘Development within Sustainable Neighbourhood Infrastructure Lands.’ It is not considered</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>appropriate to identify SNI sites or parameters that render a site suitable for development, rather, this will be assessed through the development management process.</p> <p>In formulating this response the Executive have in accordance with section 12 (8) (b) (iii) of the Planning and Development Act, 2000, (as amended) taken account of the strategic direction received from the members at pre-draft stage <i>"To request that the Chief Executive enhance the existing County Development Plan policies in regard to the protection of recreational and community spaces and infrastructure including areas currently with an INST objective"</i>.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xv) Request the omission of Objective ED from the Fire Station site from zoning Map 3 and the substitution with objective AS to provide for Art Studios.</p>	<p><b><u>B0876</u></b> <b><u>B0938</u></b></p>	<p>The Executive disagrees with the issue raised.</p> <p>In their submission to the Draft Plan, <b>B1066</b>, the Department of Education has confirmed that this location is required for a school. A planning application has been lodged for a new school at this location under Reg. ref. D21A/0248.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xvi) Submission suggests that it may be appropriate for the Council to consider SNI zoning at:</p> <ul style="list-style-type: none"> <li>● the Tivoli Training Centre.</li> <li>● the Dún Laoghaire Community Training Centre.</li> </ul>	<p><b><u>B0987</u></b></p>	<p>The Executive notes the issue raised.</p> <p>The Tivoli Training Centre on Tivoli Terrace South is located on lands zoned objective 'F' - <i>"To preserve and provide for open space with ancillary active recreational amenities"</i>.</p> <p>The Dún Laoghaire Community Training Centre location along York Road at the junction with Tivoli Terrace North, is located on lands zoned objective 'A' - <i>"To provide residential development and/or protect and improve residential amenity"</i>.</p> <p>The Draft Plan introduces a new land use zoning objective – SNI – <i>"To protect, improve and encourage the provision of sustainable neighbourhood infrastructure"</i>. This new land use zoning, Objective SNI, has been applied to:</p>

Issues	Sub. No.	Executive’s Response & Recommendation
		<ul style="list-style-type: none"> <li>• land parcels that contain existing SNI facilities together with its associated amenity / recreational space, e.g. schools, community facilities, places of worship and their associated parish / cultural centres, health care facilities.</li> <li>• lands zoned objective ‘MH’ in the current 2016-2022 plan have also been zoned Objective SNI.</li> <li>• Lands with an extant planning permission for a new SNI facility – as in the case with lands in Ballyogan where a new school has been permitted.</li> </ul> <p>In addition to the land use zoning objective, specific local objectives (SLO) have been applied to existing SNI facilities located on sites within either existing mixed use zoning objectives in town centre locations e.g. Major Town Centres (MTC) where a range of uses are already permitted in principle, and on land use zoning objectives where there are more restrictive objectives and greater protection of existing facilities, e.g. on as lands zoned ‘F’.</p> <p>These specific local objectives are:</p> <ul style="list-style-type: none"> <li>• SLO 10 – which is applied to individual SNI facilities and states: <i>“To retain, improve and encourage the provision of sustainable neighbourhood infrastructure”</i></li> <li>• SLO 22 – which is outlined and is applied to a group/cluster of adjoining facilities or a larger land parcel continuing a SNI facility and states: <i>“To retain, improve and encourage the provision of sustainable neighbourhood infrastructure facilities within the outlined group of building / land.”</i></li> </ul> <p>The SNI land use zoning objective and SLO’s seek to protect or improve existing SNI facilities / uses and identifies existing facilities. An aim of the SNI zoning objectives are to ensure that both existing and emerging residential areas are provided with and can continue to be served by an adequate level and an appropriate range of supporting social and community infrastructure.</p> <p>As per their website, the Tivoli Training Centre <i>“delivers an innovative programme of education, training and self-development for marginalised people”</i>. Permission was granted at this location for a replacement training centre under Reg. Ref. D06A/1891 and the last permitted development at this location was for temporary accommodation associated with the training centre. There has been no change to the use or function of this site within the intervening period.</p>

Issues	Sub. No.	Executive’s Response & Recommendation
		<p>As per their website the Dún Laoghaire Community Training Centre “<i>provides nationally accredited educational / training programmes and support services.</i>” The most recent planning history at this location dates from 1998 when repairs to windows within the existing “Dún Laoghaire Community Training Workshop” building (a Protected Structure) were granted under Reg. Ref. D98A/0990. There has been no change to the use or function of this site within the intervening period.</p> <p>It is considered that both of these facilities have an educational function and would fall within the umbrella of sustainable neighbourhood infrastructure.</p> <p>It is therefore considered appropriate to apply the SNI land use zoning objective to the Dún Laoghaire Community Training Centre and apply SLO 10 to the Tivoli Training Centre facility as this is located within lands zoned objective ‘F’.</p> <p><b>Recommendation</b> Amend Map 3 as follows:</p> <ul style="list-style-type: none"> <li>• Add SLO 10 to the Tivoli Training Centre facility on Tivoli Terrace South.</li> <li>• Change the land use zoning objective of the lands at the Dún Laoghaire Community Training Centre at the junction of York Road and Tivoli Terrace North from ‘A’ to ‘SNI’.</li> </ul>
<p>xvii) Submission requests that the area between Bloomfield SC and Cumberland St and the Post office to Peoples Park should be zoned residential.</p>	<p><b><u>B1096</u></b></p>	<p>The Executive notes, but respectfully disagrees with the issue raised.</p> <p>The areas in question are:</p> <ul style="list-style-type: none"> <li>• zoned objective ‘MTC’ – “<i>To Protect, provide for and/or improve major town centre facilities</i>”.</li> <li>• Located within the Dún Laoghaire Urban Framework Plan area.</li> <li>• Located within the boundary of the proposed Dún Laoghaire Local Area Plan.</li> </ul> <p>As per Table 13.1.11 in Chapter 13 ‘Land Use Zoning Objectives’, residential development is permitted in principle within lands zoned objective ‘MTC’.</p> <p>To rezone the lands in question would dilute the mix of uses required to ensure that this major town centre is vibrant with more active uses at street level.</p>

Issues	Sub. No.	Executive’s Response & Recommendation
		<p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xviii) The area around the forty foot should be zoned high amenity and/or open space.</p>	<p><b>B1096</b></p>	<p>The Executive notes the issue raised.</p> <p>The area around the forty foot contains a number of existing residential properties and functions as a residential area. The area is zoned objective ‘A’ – <i>“To provide residential development and/or protect and improve residential amenity”</i>. There is also an area of open space to the east of the forty foot which is zone objective F. – <i>“To preserve and provide for open space with ancillary active recreational amenities”</i>.</p> <p>Objective G which is the high amenity land use zoning objective covers primarily rural upland areas of the County including the Glencullen and Glendoo Valleys, Three Rock, Kilashogue, Tibbradden and Carrickgolligan.</p> <p>It is not considered appropriate to apply a high amenity land use zoning objective to areas surrounding the forty foot.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xix) Submission relates to 35/37 Glasthule Road - Request that the NC zoning which does not extend across entire site is rectified.</p>	<p><b>B1245</b></p>	<p>The Executive notes the issue raised.</p> <p>The dual zoning of the subject lands – both ‘NC’ and ‘A’ - would appear to reflect, in part, the former presence of a residential property at the site. The 1984 Development Plan Map No. 3 indicates that the subject lands incorporated a former property which, at the time, was zoned Objective ‘PR’ – <i>‘To protect residential amenities and provide for limited associated uses’</i>. The building does not appear in the subsequent 1991 Development Plan Map No.3, nor any subsequent Development Plan maps. The local centre zoning of the adjacent lands was expanded under the 1991 County Development Plan and incorporated part of, but not the full extent of lands associated with the former property. The historical zoning delineation at the site has remained in place through successive Development Plans. There is a surface car park/car sales currently on site.</p> <p>In more recent times, planning permission for mixed-use development incorporating the full extent of the subject lands has been granted. Under Reg. Ref. D13A/0671 planning</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>permission was granted for a mixed-use scheme comprising retail and residential uses. The lifetime of this permission was extended under D13A/0671/E and it remains extant. Alterations have also been granted. Whilst land use zoning objectives do not necessarily follow property boundaries, in this instance, having regard to the permitted uses at the subject site – which supports the concept of a mix of sustainable uses on neighbourhood centre lands, – it is recommended that the small portion of the site within the boundary of 35 – 37 Glashule Road zoned Objective 'A' is re-zoned Objective 'NC', thereby providing one single land use class pertaining to the site.</p> <p><b>Recommendation</b> Amend Map No. 3 to re-zone the portion of the lands at 35/37 Glashule Road from Objective 'A' to Objective 'NC'.</p>
<b>3.31.4: Map 4</b>		
<p>i) Request rezoning of grass area at Saval Grove/Fairlawns to public amenity space.</p> <p>Concerns raised in relation to a potential unauthorised pedestrian gate onto green area at Saval Park Road.</p>	<p><b><u>B0019</u></b> <b><u>B0020</u></b> <b><u>B0021</u></b></p>	<p>The Executive agrees with the issue raised.</p> <p>The area in question functions as an incidental area of open space and is linked with a larger open space area to the north. Having regard to the function of the land, it is recommended to rezone this area to objective 'F' – <i>“To preserve and provide for open space with ancillary active recreational amenities”</i>.</p> <p><b>Potential unauthorised development, such as that stated by the submitter, is an operational matter for the Planning Enforcement section.</b></p> <p><b>Recommendation</b> Amend Maps 4 and 7 to rezone the open space area located at to the east of Fairlawns along Saval Grove / Barnhill Avenue.</p>
<p>ii) Submission requests that lands in private ownership at Ardbrough Road, Dalkey:</p> <ul style="list-style-type: none"> <li>• Is correctly defined and seeks clarification if these are the only lands in private ownership with this zoning objective.</li> <li>• Is zoned residential to allow for the further development of land at the rear of Dalkey Rock.</li> </ul>	<p><b><u>B0057</u></b> <b><u>B0554</u></b></p>	<p>The Executive notes the issue raised.</p> <p>The Development Plan maps use OSI base mapping. Land use zoning does not follow land ownership boundaries, therefore land uses can, and do, extend across more than one ownership. <b>Access across private lands is not a County Development Plan issue.</b></p>

Issues	Sub. No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> <li>That public access to the rock face is cordoned off by DLR to prevent access for climbing at private lands.</li> </ul>		<p>The land in question is zoned objective 'F' - <i>"To preserve and provide for open space with ancillary active recreational amenities"</i> and forms part of the Dalkey Coastal Zone and Kiliney Hill/Rocheshill proposed Natural Heritage Area (pNHA).</p> <p>This is a National designation applied by the National Parks and Wildlife Service.</p> <p>The land to the rear (south) of Dalkey Rock was conditioned <i>"to be retained as a natural grassland/ woodland area"</i> (Condition 2(C), Reg. Ref. 7/93) and appears to function as open space associated within this residential scheme.</p> <p>These lands function as open space and have a nationally important environmental designation (pNHA), it is therefore not considered appropriate to alter the land use zoning objective at this location.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submission requests that a group of townhouses on St Patricks Rd, Dalkey, are re-zoned from mixed use (currently NC) to residential to protect the residential amenity of the area.</p>	<p><b>B0066</b></p>	<p>The Executive notes the issue raised.</p> <p>Table 13.1.12 in Chapter 13 of the Draft Plan sets out uses that would be permitted in principle or open for consideration within lands zoned objective 'NC' – <i>"To protect, provide for and/or improve mixed-use neighbourhood centre facilities"</i>. Residential development is permitted in principle within this zoning objective.</p> <p>Policy Objective RET6: 'Neighbourhood Centre' in Chapter 7 of the Draft Plan takes residential amenities into account in the policy wording and text. RET6 states: <i>"It is a Policy Objective of the Council to support the development of the Neighbourhood Centres as the focal point of the communities and neighbourhoods they serve, by way of the provision of an appropriate mix, range and type of uses – including retail and retail services – in areas zoned objective 'NC' subject to the protection of the residential amenities of the surrounding area"</i>.</p> <p>Having regard to the provisions of Policy Objective RET6, it is not considered necessary to rezone the area in question.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Executive’s Response & Recommendation
<p>iv) Submission requests that the O/O designation at Pine Hill, Vico Road be considered for removal.</p>	<p><b><u>B0568</u></b></p>	<p>No change to Draft Plan.</p> <p>The Executive notes the issues raised.</p> <p>As already responded to in detail in this report under Section 2.1 ‘Summary of the Observations, Submissions and <b>Recommendations</b> of the Office of the Planning Regulator’, subsection 2.1.7 ‘Infill and brownfield development’, the O/O zone was reviewed while preparing the Draft Plan. This review resulted in a change to the boundary of the O/O zone and revised wording was set out in Policy Objective PHP18: Residential Density. As per the recommendations made by the OPR in their submission no. <u>B1102</u>, the Executive have recommended to omit the ‘Notable Character Area Exclusions’ section under Policy Objective PHP18 and the corresponding development management section in Chapter 12, Section 12.3.8.8. It is also recommended to omit the O/O zone from maps 4, 7 and 10.</p> <p><b>Recommendation</b>  <a href="#">See detailed response and recommendation set out in Section 2.1 above.</a></p>
<p>v) Submission seeks the rezoning of the art gallery site at Mount Eagle, Vico Road, from F to A and apply the O/O designation to the site.</p>	<p><b><u>B0971</u></b></p>	<p>The Executive notes the issue raised.</p> <p>The site in question which is located below Killiney Hill and adjoining White Rock Bathing area is zoned Objective F – to preserve and provide for open space with ancillary active recreational amenities. The area is one of high scenic amenity and also of environmental sensitivity (the site adjoins a pNHA).</p> <p>There is a comprehensive planning history to this site. Under register reference D94A/0227 permission was granted for an Art Gallery (with Caretaker’s Flat). The Building was considered to be a “recreational building” and there was also a SLO contained in the Development Plan “<i>To provide an art gallery</i>” on the site. Under D12A/-324 permission was refused by the Council and upheld by A Board Pleanala for a change of use of the Art Gallery Building from its approved use as a private art gallery with caretaker accommodation and residential use to use as a private dwelling house. The refusal reason related to the fact that residential use would be a material contravention of the zoning objective.</p> <p>The submission received states that the building has been unoccupied since 2008 and that it is falling into disrepair. The submission also considers that it makes no sense for the Council to seek a zoning objective “F” to an area already covered in a building footprint which it</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>considers has no real prospect of returning to open space use. The Executive would not concur with this view in that the F zone allows others uses that are compatible with the - overall land use objective - cultural use is one such use that is permitted on the site. Educational use, sports facility, community facility are also permitted in principle whilst there are also a range of uses open for consideration some of which can only be considered in an existing building. It is not considered that a robust argument has been put forward to support the rezoning submission. Whilst the submission puts forward narrative as to why the building in not suitable for use as a public gallery other uses have not been explored. Given the high scenic amenity and environmental sensitivities of the site and surrounding area the Executive would not support a rezoning from F to A.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.31.5: Map 5</b>		
<p>i) Submission requests that the triangular area between Blackglen Road, Woodside Road and Slate Cabin Road is rezoned to take account of its transitional nature and role in acting as a wildlife corridor.</p>	<p><b><u>B0034</u></b> <b><u>B0284</u></b> <b><u>B0307</u></b></p>	<p>The Executive notes the issue raised.</p> <p>Transitional zonal areas in the County are not stand alone land use zoning objectives, rather this refers to areas where zoning objectives change and where development management standards would differ between the zoning objectives. As per Section 13.1.2 'Transitional Zonal Areas' in Chapter 13 of the Draft Plan, <i>"it is important to avoid abrupt transitions in scale and use in the boundary areas of adjoining land use zones."</i></p> <p>It is noted that the triangular area between Blackglen Road, Woodside Road and Slate Cabin Lane has not been identified on the current 'Ecological Network Map' (Supplementary map B1) of the Draft Plan. Any development proposed and any ecological value of the area identified would be assessed as part of the development management process.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission seeks the rezoning of land adjacent to 1 Ferncarrig Avenue, Sandyford to residential in order to build upon the site</p>	<p><b><u>B0046</u></b></p>	<p>The Executive note the issue raised. Planning permission was refused on the subject site (D18A/0077) for the provision of a two storey house. The Planners report noted that the area in question <i>"is an attractive open space, that offers a lot of value in terms of nature and recreation to the nearby residents"</i></p>

Issues	Sub. No.	Executive’s Response & Recommendation
		<p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submission expresses appreciation for the retention of exiting F zoning adjacent to St Attractas National schools, Broadford Road.</p>	<p><b>B0068</b></p>	<p>The Executive notes the issue raised.</p> <p>There is no proposal in the Draft Plan to rezone this site.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Requests that the currency centre lands in Sandyford are rezoned from E back to A as per the current Plan as the lands are suitable for residential development.</p> <ul style="list-style-type: none"> <li>● Considers current use does not readily fall within the definition of other uses and in itself is a use; however may be considered under the broad ‘light industrial’ use.</li> <li>● Requests that along with the maintenance of the A zoning objective, that a Specific Local Objective be included as follows:</li> <li>● <i>“To provide for the ongoing operation of the Currency Centre in a new facility within the lands and to provide for residential use should the continued operation of the Currency Centre facility on all or part of the lands not be required.”</i></li> <li>● Request that currency centre be included as a permissible use under the A zoning objective, with a footnote linking this provision solely to the requested SLO.</li> </ul>	<p><b>B0254</b></p>	<p>The Executive notes the issues raised.</p> <p>Whilst it is noted that items are raised that pertain to issues other than zoning, including the addition of an SLO and changes to the uses permitted under the A land use zoning, all items are dealt with under this section as they are interrelated.</p> <p>The Draft Plan zones the site of the currency centre at Sandyford as land use zoning objective E. Whilst the submission argues that the site is suitable for residential the current use is employment. The E zone also does not preclude residential development. Policy Objective E14 Securing Employment Growth as set out in Chapter 6 of the Draft Plan addresses same. Whilst a restrictive approach is taken to residential use on employment zoned lands the use is open for consideration. The request to zone the site back to the A objective and to provide an SLOs to allow for the ongoing use of the currency centre and facilitate residential development is considered to be an overly complex proposal when applying the E Zoning objective to the lands is accurate, simple and clear for the average reader of the Plan to comprehend.</p> <p>The submission sets out that a strategic review of the operations located on the subject lands is currently underway. The Strategic Review has identified two primary options, either a new facility on a portion of the lands or a new facility on different lands. It is noted that the second option is not considered a probable outcome at this juncture. In the event that a new smaller currency centre is developed on the lands and not all of the site is required the E zoning allows residential use to be explored. In the event that the currency centre is relocated and the lands are available for development an argument can be made for a rezoning in a subsequent plan.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>It is noted that in a successful Section 9 appeal to ABP in relation to the placing of the site on the Vacant Site Register, the grounds of appeal put forward by the central bank as set out in the Inspectors report included the grounds that the rationale for the A zoning objective in the 2016 Plan was unclear given that the lands have been used by the Central Bank since the 1970's and also that a reason preventing provision of housing on the lands related to the critically important security requirements of the Currency Centre. As set out above if the facility were to relocate in the future a request could be made for rezoning under a future County Development Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>v) Seeks a consistent zoning objective across both sides of Slate Cabin Lane noting that the character of the southern side of the road does not match the description of zoning Objective 'B'.</p> <p>Requests the re-zoning of all houses accessed off Slate Cabin Lane in Sandymount from Objective 'B' to Objective 'A'.</p>	<p><b><u>B0346</u></b> <b><u>B0957</u></b></p>	<p>The Executive does not agree with the issue raised.</p> <p>It is considered that the localised zoning provisions at Slate Cabin Lane, which have been in place for a significant period of time, serve to protect the transitional nature of the 'foothills' area and continues to be appropriate. It is noted that a small portion of the lands to the south of Slate Cabin Lane are located within Flood Zone A and Flood Zone B – see map 5 of the Strategic Flood Risk Assessment.</p> <p>As set out in Section 2.4.4 of the Draft Plan, broad equilibrium exists between the supply of zoned land for primarily residential purposes, and the projected demand for new housing. In accordance with the proposed settlement strategy for the County there are already more than sufficient residentially zoned land to cater for forecast demands and targets set by the RSES. It is not considered warranted to zone additional residential land for the 2022-2028 County Development Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>vi) Requests the re-zoning of lands at Capilano, Ticknock Cross, Dublin 18 from Objective 'G' to Objective 'A'.</p>	<p><b><u>B0387</u></b></p>	<p>The Executive does not agree with the issue raised.</p> <p>Objective 'G' zoned lands - 'To protect and improve high amenity areas' - are the most sensitive and highly protected upland areas in the County. The selection of lands for high amenity zoning was originally based on, among other factors, their elevation, landscape</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>quality and views and prospects. It is not considered that there is any compelling reason to re-zone these high amenity lands in the Draft Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>vii) Request rezoning of lands at Wesley Height from A to F as:</p> <ul style="list-style-type: none"> <li>• the area is under the care of the DLR Co. Co.</li> <li>• the area was provided for that sole purpose by Sorohan Builders the developers of the Wesley Estate.</li> <li>• In a letter dated 15<sup>th</sup> August 2002) of 42 Wesley Heights from DLR Co.Co., it advised that the advice received from the Council's Law Agent stated, <i>"the land in question is dedicated open space as an amenity for all the residents of Wesley Estate and is conditioned under the planning permission for the development of the Estate, to be left in perpetuity."</i></li> </ul>	<p><b><u>B0428</u></b> <b><u>B0538</u></b> <b><u>B0846</u></b> <b><u>B1019</u></b></p>	<p>The Executive notes the issue raised and as the lands in question were dedicated as open space it is recommended that the site be rezoned.</p> <p><b>Recommendation</b> Rezone lands at Wesley Heights from A to F.</p>
<p>viii) Requests the re-zoning of lands associated with 'Eden Farm' at the Airfield Estate, Dundrum from zoning Objective 'F' to zoning Objective 'A'.</p>	<p><b><u>B0790</u></b></p>	<p>The Executive does not agree with the issue raised.</p> <p>The lands at Airfield Estate in Dundrum have been zoned Objective 'F' through successive Development Plans since 2004. The Local Authority acknowledges Airfield Estate as one of the largest tourism products in the County and supports the continued protection and enhancement of the Estate for educational, recreational, and cultural uses. The Draft Plan includes an SLO in this regard.</p> <p>The submission notes that there is a residential property on the Estate, namely Eden Farm, which is zoned Objective 'F' and in use is as a residential dwelling. The submission also notes that Eden Farm does not currently form part of the operational farm and is a separate and distinct land use. The case is made that the current zoning does not reflect the historic and established use of the property and that the property should be rezoned to reflect its established use.</p>

Issues	Sub. No.	Executive’s Response & Recommendation
		<p>The Executive would have concerns in relation to the potential dilution of the overall open space/amenity use at the Airfield Estate through the re-zoning of part of the landholding for potentially other separate and distinct uses. The Local Authority are of the view that the subject lands form part of the Estate, notwithstanding their current use and notwithstanding the stated position that the lands do not currently form part of the operational farm.</p> <p>It is noted that section 13.1.7 on the Plan – Non Conforming Uses – would allow for consideration of extension or improvement to the premises in its use as a residential dwelling.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ix) Submission requests that the Planning Authority amend the maps to clearly show by way of a delineated boundary the INST designation on the Ghort Mhuire lands not applying to certain portions of the overall lands.</p> <p>Submission provides commentary on a recent court judgment relating to the INST designation and argues that “ownership” and “use” are key determinants in defining what lands should be subject to an INST designation in the new County Development Plan”</p> <p>It is argued that the lands at Ghort Mhuire are not used for any institutional purposes and were the remainder of a working farm that operated within a larger landholding owned by the Order.</p> <p>The Landscape Character Assessment states that the site did form part of the Carmelites Centre lands at the time of the adoption of the 2016 Plan</p>	<p><b><u>B0902</u></b></p>	<p>The Executive notes the issues raised. The INST symbol is shown on Draft Development Plan Map 5 at Ghort Mhuire. There are a number of sites on the Development Plan maps which carry the INST objective – “<i>To protect and/or provide for Institutional Use in open lands</i>”.</p> <p>Policy Objective PHP21: ‘Development on Institutional Lands’ states: “<i>It is the Policy Objective to retain the open character and/or recreational amenity of land parcels that are in institutional use (such as religious residential or other such uses) and are proposed for redevelopment</i>”. PHP21 further requires a minimum open space quantum to apply to the “<i>entire ‘INST’ land parcel, as determined by the Planning Authority</i>”.</p> <p>A key objective of the ‘INST’ objective is to protect the open character and recreational amenity of the institutional lands. The area to which it applies is usually teased out at planning application stage having regard to the existing and historical land use and associations between land uses, and the extent to which any lands contribute to the open character and setting of the core institutional function.</p> <p>It is considered that section 4.3.1.4 should be amended to provide clarity.</p> <p>In formulating this response the Executive have in accordance with section 12 (8) (b) (iii) of the Planning and Development Act, 2000, (as amended) taken account of the strategic direction received from the members at pre-draft stage “<i>To request that the Chief Executive enhance the existing County Development Plan policies in regard to the protection of</i></p>

Issues	Sub. No.	Executive's Response & Recommendation
but also argues that the lands were in agricultural use.		<p><i>recreational and community spaces and infrastructure including areas currently with an INST objective”.</i></p> <p><b>Recommendation</b> Amend section 4.1.3.4 page 84 first bullet point. Add a new sentence as follows;</p> <p><i><u>In determining the area to which the “INST” objective applies the planning authority shall have regard to the existing and historical land use and associations between land uses, and the extent to which any lands contribute to the open character and setting of the core institutional function.</u></i></p>
x) Requests the rezoning of lands to the rear of a house on Blackglen Road from Objective 'G' to Objective 'A'.	<b><u>B0966</u></b>	<p>The Executive does not agree with the issue raised.</p> <p>Objective 'G' zoned lands - 'To protect and improve high amenity areas' - are the most sensitive and highly protected upland areas in the County. The selection of lands for high amenity zoning was originally based on, among other factors, their elevation, landscape quality and views and prospects. It is not considered that there is any compelling reason to re-zone these high amenity lands in the Draft Plan. The contention that it is unusual for a land use zoning to cut across property ownership is not supported as zoning of lands is not determined by ownership.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
xi) Requests the re-zoning of lands at Blackglen Road from Objective 'F' to Objective 'A'.	<b><u>B1052</u></b>	<p>The Executive does not agree with the submission.</p> <p>As set out in Section 2.4.4 of the Draft Plan, broad equilibrium exists between the supply of zoned land for primarily residential purposes, and the projected demand for new housing. In accordance with the proposed settlement strategy for the County there are already more than sufficient residentially zoned land to cater for forecast demands and targets set by the RSES. It is not considered warranted to zone additional residential land for the 2022-2028 County Development Plan.</p> <p>See Section 3.14 'Specific Local Objectives' for more detail on this submission.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Executive’s Response & Recommendation
<p>xii) Requests the re-zoning of lands to the west of the Explorium facility at Blackglen Road from Objective ‘F’ to Objective ‘SNI’.</p>	<p><b><u>B1052</u></b></p>	<p>No change to Draft Plan.</p> <p>The Executive notes the issue raised but would not agree with the rezoning request.</p> <p>The submission relates to lands on Blackglen Road where the Explorium commercial leisure facility is located. SLO 159 of the current Plan is <i>“To facilitate suitable proposals for the use/reuse and extension of the existing sports science complex and health and fitness club facility at Blackglen Road/Ticknock Drive and to provide for suitable uses - to include uses relating to health and fitness, rehabilitation services and transitional/`step-down` care services and associated medical support services - including the provision of an appropriate level of associated short-stay accommodation on site.”</i> This SLO specifically relates to the reuse of the building which back in 2015 was empty and idle. The current plan zoned the building MH – To improve, encourage and facilitate the provision and expansion of medical/hospital uses and services’.</p> <p>The submission requests that <i>“The existing MH zoning should be replaced with the SNI zoning objective”</i>. A map is submitted (which it is noted does not show the existing building to be zoned to SNI but illustrates an additional portion of open land to the north west of the existing building to be rezoned SNI). These lands do not meet the criteria - which are set out in detail elsewhere in this report - for rezoning to SNI. The lands in the site currently zoned MH in the 2016 – 2022 Plan which are proposed as F zoning in the Draft Plan are not recommended to be rezoned as SNI, as notwithstanding the fact that the buildings are currently zoned MH, this zoning related to a proposed development which did not ultimately proceed and it is considered that the current commercial leisure use does not meet the uses set out in the SNI rezoning criteria.</p> <p>(See also section 3.14 Specific Local objectives)</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p><b>3.31.6: Map 6</b></p>		
<p>i) Submission requests that the existing residential property at 12 Pine Lawn be rezoned from F to A.</p>	<p><b><u>B0328</u></b> <b><u>B0766</u></b></p>	<p>The Executive notes the issue raised.</p>

Issues	Sub. No.	Executive’s Response & Recommendation
<p>Submission considers that the current zoning is contrary to national and regional policy, is inconsistent with the overall policies of the Draft Plan and discriminates against the owners of the property.</p>		<p>The land at no. 12 Pine Lawn, Blackrock is located within lands zoned objective ‘F’ – “To preserve and provide for open space with ancillary active recreational amenities.” The property contains a dwelling and its associated gardens and vehicular access.</p> <p>This dwelling was initially granted permission under Reg. Ref. XA/652 in 1982 under the provisions of the Dublin County Development Plan 1972. The lands were zoned ‘A’- ‘to preserve and improve residential amenity’ in this plan.</p> <p>An amending application was subsequently granted under Reg. Ref. 88A/0987 under the provisions of the Dublin County Development Plan 1983. The lands were zoned ‘F’ – ‘to preserve and provide for open space and recreational amenities’ in this plan. The land use zoning objective of ‘F’ has remained in place at this location since the 1983 plan.</p> <p>It is noted that residential use was open for consideration in lands zoned objective ‘F’ up to and including the County Development Plan 2004-2010. Residential use was not listed as being either permitted in principle or open for consideration in land use zoning table for objective ‘F’ in the County Development Plan 2010-2016 or in the current 2016 plan.</p> <p>Having regard to the land use zoning objective of the site, it is considered that the current residential use on site constitutes a non-conforming use.</p> <p>Section 13.1.7 ‘Non-Conforming Uses’ in Chapter 13 states: <i>“Throughout the County there are uses which do not conform to the zoning objective for the area. All such uses, where legally established (the appointed day being 1 October 1964) or were in existence longer than 7 years, shall not be subject to proceedings under the Act in respect of continuing use. When extensions to, or improvements of, premises accommodating such uses are proposed, each shall be considered on their merits, and permission may be granted where the proposed development does not adversely affect the amenities of premises in the vicinity and does not prejudice the proper planning and sustainable development of the area.”</i></p> <p>It is considered that any extensions or improvements to the existing dwelling would be considered on their merits having regard to Section 13.1.7 in the Draft Plan.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>Given the existing 'F' zoning objective of the site, this land would not have been included as an 'infill/windfall' site development as set out in Section 2.3.7 'Residential Development Capacity Audit' in Chapter 2 of the Draft Plan. As per the Core Strategy in Chapter 2 of the Draft Plan, additional zoning of land for residential purposes is not required.</p> <p>In this respect and having regard to Section 13.1.7, it is neither considered necessary nor warranted to change the zoning objective of this site.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Requests the re-zoning of lands at Brewery Road, Stillorgan from Objective 'F' to Objective 'A'.</p>	<p><b><u>B0569</u></b></p>	<p>The Executive does not agree with the submission.</p> <p>The subject lands are zoned Objective 'F' – 'To preserve and provide for open space with ancillary active recreational amenities'. It is noted that the lands were conditioned an open space area by An Bord Pleanála under Reg. Ref. PL.06D.102657.</p> <p>It is noted that part of the lands are located in Flood Zone A and Flood Zone B, as indicated on Flood Map 6 of the Strategic Flood Risk Assessment.</p> <p>The Executive recommends the zoning of the subject site as Objective 'F' is maintained.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Submission request removal of the Travellers Accommodation symbol from lands at John of Gods Stillorgan as it is considered that the proposal to locate grouped housing could conflict with current provision of hospital services, could conflict with proposals which it has for the development of the hospital and its services and is unlikely to be deliverable and therefore should not be identified on the land.</p>	<p><b><u>B0920</u></b></p>	<p>The Executive notes the issue raised.</p> <p>It is a requirement of Section 10 of the Planning and Development Act that the Development Plan include objectives "for the provision of accommodation for Travellers, and the use of particular areas for that purpose". Any sites shown for traveller accommodation on the County Plan maps are ones that are contained in the agreed Travellers Accommodation Programme 2019 – 2024. which was adopted by the elected members on the 1st July 2019. The TAP identifies this site as a site for 6 homes and acknowledges that the site is not in Council ownership. Any proposal would require to be subject to a Part 8 approval by the Council.</p>

Issues	Sub. No.	Executive’s Response & Recommendation
		<p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Object to SNI zoning on the presbytery associated with Foxrock Church. Request rezoning to A as it is in residential use.</p> <p>v) It is considered that permitted in principle uses for the SNI zoning objective would not be suitable for the presbytery due to its location close to a busy road.</p>	<p><b>B1243</b></p>	<p>The Executive disagrees with the request to re-zone these lands from ‘SNI’ to ‘A’ at this location.</p> <p>The Draft Plan introduces a new land use zoning objective – SNI – “To protect, improve and encourage the provision of sustainable neighbourhood infrastructure”. This new land use zoning, Objective SNI, has been applied to:</p> <ul style="list-style-type: none"> <li>• land parcels that contain existing SNI facilities together with its associated amenity / recreational space, e.g. schools, community facilities, places of worship and their associated parish / cultural centres, health care facilities.</li> <li>• lands zoned objective ‘MH’ in the current 2016-2022 plan have also been zoned Objective SNI.</li> <li>• Lands with an extant planning permission for a new SNI facility – as in the case with lands in Ballyogan where a new school has been permitted.</li> </ul> <p>A presbytery is the residence of one or more parish priests or clergy and is typically located within the same site or immediately adjacent to a church or place of worship. It is considered that a presbytery is an important supporting element in the operation of a place of worship and, in forming part of the religious function of such a property, contributes positively to maintaining and/or creating sustainable neighbourhoods. In this regard, where a place of worship has an associated presbytery or other form of accommodation for its clergy, that this is considered to form part of the SNI function of the property / lands and has been incorporated into the SNI zoning objective of such lands.</p> <p>In order to determine which lands and/or facilities are associated with the primary SNI use, boundaries used in planning histories have been reviewed and have been used in the application of the SNI zoning objective.</p> <p>It is considered that the subject presbytery is directly associated with the Church of Our Lady of Perpetual Succour. It is noted that there is pedestrian access between the church and presbytery. Planning history for the church has consistently incorporated the presbytery within lands associated with the church. It is therefore considered that the presbytery is intrinsically linked with the religious function of the overall land parcel.</p>

Issues	Sub. No.	Executive’s Response & Recommendation
		<p>As set out in Table 13.1.7 (pg. 306), Chapter 13 of the Draft Plan, a number of uses are both permitted in principle and open for consideration under the land use zoning Objective SNI. Notwithstanding the location of the presbytery adjoining a busy national road, there are a number of uses that may be suitable at this location given its direct connection with and access to the church.</p> <p>It is acknowledged that there will be sites in the County subject to the SNI zoning objective that may be capable of accommodating other forms of development whilst still protecting existing SNI facilities and the recreational value of such sites. All proposed development on lands zoned SNI will be subject to compliance with the requirements of Section 12.3.2.1 ‘Development within Sustainable Neighbourhood Infrastructure Lands.’ It is not considered appropriate to identify SNI sites or parameters that render a site suitable for development, rather, this will be assessed through the development management process.</p> <p>In formulating this response the Executive have in accordance with section 12 (8) (b) (iii) of the Planning and Development Act, 2000, (as amended) taken account of the strategic direction received from the members at pre-draft stage <i>“To request that the Chief Executive enhance the existing County Development Plan policies in regard to the protection of recreational and community spaces and infrastructure including areas currently with an INST objective”</i>.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<b>3.31.7: Map 7</b>		
<p>i) The DC zoning at Cornelscourt SC should be expanded non-contiguously to include the two village centres and access to Cabinteely Park.</p>	<p><b><u>B0078</u></b></p>	<p>The Executive notes the issue raised but would not concur with the request to extend the DC land use zoning to include Cabinteely and Cornelscourt Villages and the entrance to Cabinteely Park. The two aforementioned villages are zoned objective NC - <i>To protect, provide for and/or improve mixed-use neighbourhood centre facilities</i>. The DC land use zoning is <i>To protect, provide for and/or improve mixed-use district centre facilities</i>. There is a fundamental difference between the two zoning objective DC and NC and it is respectfully considered that they both function in different ways with the 5 District Centres in the County having a much wider catchment in terms of the population they serve. The mix of uses currently provided for in both Cabinteely and Cornelscourt Villages serve the local</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>community. Cabinteely village is also not identified in the Greater Dublin Retail Strategy hierarchy as being one of the five District Centres, and whilst Cornelscourt is identified this is taken to be the area already zoned DC and does not and should not include the village element.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submissions received both in support and against the SNI zoning at Clonkeen College Lands.</p> <ul style="list-style-type: none"> <li>Submission requests the pitches at Clonkeen College are saved for sporting purposes and open spaces area respected</li> <li>Submission requests that residential, A zoned land, is retained on lands, with an area of 3.3Ha, owned by the Congregation of Christian Brothers and queries if the rezoning to SNI was in error.</li> <li>Consider SNI rezoning appropriate for the school building and ancillary playing pitches at Clonkeen Collage and also appropriate for the area to be developed as a new pitch but not appropriate for the 3.3 hectares of adjoining land.</li> <li>The School and new pitches are owned by the ERST but the ERST does not have an interest in the 3.3 hectares. The 3.3 ha area is owned by the Christina Brothers who are contacted to sell to Clonkeen Investments DAC who are engaged in pre-planning discussions for a SHD application for a residential development with childcare facility development.</li> <li>The development of the new school pitch is dependent upon the residential development.</li> </ul>	<p><u><b>B0132</b></u> <u><b>B0347</b></u>  <u><b>B0134</b></u> <u><b>B0351</b></u>  <u><b>B0135</b></u> <u><b>B0364</b></u>  <u><b>B0136</b></u> <u><b>B0367</b></u>  <u><b>B0138</b></u> <u><b>B0376</b></u>  <u><b>B0140</b></u> <u><b>B0377</b></u>  <u><b>B0142</b></u> <u><b>B0378</b></u>  <u><b>B0143</b></u> <u><b>B0382</b></u>  <u><b>B0144</b></u> <u><b>B0383</b></u>  <u><b>B0145</b></u> <u><b>B0384</b></u>  <u><b>B0146</b></u> <u><b>B0385</b></u>  <u><b>B0148</b></u> <u><b>B0386</b></u>  <u><b>B0150</b></u> <u><b>B0392</b></u>  <u><b>B0154</b></u> <u><b>B0393</b></u>  <u><b>B0155</b></u> <u><b>B0394</b></u>  <u><b>B0159</b></u> <u><b>B0397</b></u>  <u><b>B0161</b></u> <u><b>B0398</b></u>  <u><b>B0162</b></u> <u><b>B0399</b></u>  <u><b>B0163</b></u> <u><b>B0400</b></u>  <u><b>B0164</b></u> <u><b>B0401</b></u>  <u><b>B0165</b></u> <u><b>B0402</b></u>  <u><b>B0166</b></u> <u><b>B0407</b></u>  <u><b>B0167</b></u> <u><b>B0409</b></u>  <u><b>B0168</b></u> <u><b>B0414</b></u>  <u><b>B0169</b></u> <u><b>B0415</b></u>  <u><b>B0170</b></u> <u><b>B0416</b></u>  <u><b>B0171</b></u> <u><b>B0417</b></u></p>	<p>The Executive notes and welcomes the support with regard to the SNI zoning objective, however, disagrees with the requested rezoning of part of the lands to A and disagrees that residential should be removed from the 'SNI' land use objective in its entirety.</p> <p>The Draft Plan introduces a new land use zoning objective – SNI – “To protect, improve and encourage the provision of sustainable neighbourhood infrastructure”. This new land use zoning, Objective SNI, has been applied to:</p> <ul style="list-style-type: none"> <li>land parcels that contain existing SNI facilities together with its associated amenity / recreational space, e.g. schools, community facilities, places of worship and their associated parish / cultural centres, health care facilities.</li> <li>lands zoned objective 'MH' in the current 2016-2022 plan have also been zoned Objective SNI.</li> <li>Lands with an extant planning permission for a new SNI facility – as in the case with lands in Ballyogan where a new school has been permitted.</li> </ul> <p>The SNI land use zoning objective seeks to protect or improve existing SNI facilities / uses and identifies existing facilities. An aim of the SNI zoning objectives are to ensure that both existing and emerging residential areas are provided with and can continue to be served by an adequate level and an appropriate range of supporting social and community infrastructure.</p> <p>The portion of land sought to be rezoned to 'A' wraps around the existing school buildings and pitches to the east and south of the campus. A 2-storey building housing the 'The Edmund Rice Schools Trust' is located within this land parcel immediately to the east of the school building. The remainder of the lands are made up of open green space which appears to function as amenity space associated with the school.</p>

Issues	Sub. No.	Executive’s Response & Recommendation
<ul style="list-style-type: none"> <li>Notes that Clonkeen College has provided educational and cultural value to the local community.</li> <li>It is important to ensure that there is ample facilities and amenities for the growing population.</li> <li>Suggests that a portion of the site be considered for primary school needs in the area.</li> <li>The current (A) zoning is inconsistent with the needs of the community.</li> <li>Green spaces at this location need to be retained.</li> <li>Notes that the lands were granted / donated for educational purposes by Royal Exchange Assurance with the co-operation of the Proby Estate.</li> <li>Any new development would impact upon the amenities of existing residential properties.</li> <li>Until recently the pitches were used by a number of groups and remains an asset in the area.</li> <li>Residents were not made aware of additional residential development at this location when purchasing.</li> </ul> <p>A number of the submissions received in relation to lands at Clonkeen College requested that ‘residential’ is removed from SNI land use zoning objective table entirely. A number of reasons cited for this include:</p> <ul style="list-style-type: none"> <li>Open space and sports facilities should be retained.</li> </ul>	<p><b><u>B0172</u></b> <b><u>B0420</u></b>  <b><u>B0173</u></b> <b><u>B0422</u></b>  <b><u>B0174</u></b> <b><u>B0433</u></b>  <b><u>B0175</u></b> <b><u>B0434</u></b>  <b><u>B0176</u></b> <b><u>B0435</u></b>  <b><u>B0177</u></b> <b><u>B0343</u></b>  <b><u>B0178</u></b> <b><u>B0439</u></b>  <b><u>B0179</u></b> <b><u>B0441</u></b>  <b><u>B0180</u></b> <b><u>B0442</u></b>  <b><u>B0181</u></b> <b><u>B0443</u></b>  <b><u>B0182</u></b> <b><u>B0445</u></b>  <b><u>B0183</u></b> <b><u>B0345</u></b>  <b><u>B0184</u></b> <b><u>B0448</u></b>  <b><u>B0185</u></b> <b><u>B0449</u></b>  <b><u>B0186</u></b> <b><u>B0456</u></b>  <b><u>B0187</u></b> <b><u>B0457</u></b>  <b><u>B0188</u></b> <b><u>B0459</u></b>  <b><u>B0189</u></b> <b><u>B0461</u></b>  <b><u>B0190</u></b> <b><u>B0464</u></b>  <b><u>B0191</u></b> <b><u>B0465</u></b>  <b><u>B0193</u></b> <b><u>B0466</u></b>  <b><u>B0194</u></b> <b><u>B0473</u></b>  <b><u>B0195</u></b> <b><u>B0480</u></b>  <b><u>B0198</u></b> <b><u>B0481</u></b>  <b><u>B0199</u></b> <b><u>B0482</u></b>  <b><u>B0201</u></b> <b><u>B0483</u></b>  <b><u>B0202</u></b> <b><u>B0484</u></b>  <b><u>B0204</u></b> <b><u>B0486</u></b>  <b><u>B0205</u></b> <b><u>B0487</u></b>  <b><u>B0208</u></b> <b><u>B0488</u></b>  <b><u>B0209</u></b> <b><u>B0493</u></b>  <b><u>B0210</u></b> <b><u>B0495</u></b>  <b><u>B0211</u></b> <b><u>B0497</u></b>  <b><u>B0212</u></b> <b><u>B0498</u></b></p>	<p>The Edmund Rice Schools Trust building is accessed from Meadow Vale independently from the school and there is a boundary wall between the school and the Trust building.</p> <p>As per their website, “<i>The Edmund Rice Schools Trust has responsibility for 96 schools, secondary and primary, in the Republic of Ireland</i>” and “<i>the main object of the Company is to ensure and foster the advancement of education.</i>”</p> <p>In order to determine which lands and/or facilities are associated with the primary SNI use, boundaries used in planning histories have been reviewed and have been used in the application of the SNI zoning objective.</p> <p>Planning history for the school campus has historically included the Edmund Rice Schools Trust building and the open green space to the rear of the college have been located within the campus boundary. In 2008, the lands at the Edmund Rice Schools Trust were subject to an application for residential development (Reg. Ref. D08A/0042) – this development was refused and no subsequent proposal for development at this location has been received.</p> <p>One planning application, Reg. Ref. D10A/089, received after this proposed residential development included the Edmund Rice Schools Trust lands within the campus boundary. All subsequent applications received with regard to the school have excluded these lands on site maps/ plans, however, the remainder of the campus, including the green amenity space to the rear / south and east have been within the boundary of the of the college, including the most recent planning application under Reg. ref. D13A/0681.</p> <p>Having regard to the planning history and the function of the Edmund Rice Schools Trust, it considered that the Edmund Rice Schools Trust and the green amenity space has been historically and/or is intrinsically linked with the educational function of the overall campus. Furthermore, it is considered that the function of the Edmund Rice Schools Trust, being linked with the provision of education services, would be a form of social infrastructure and would fall within the umbrella of sustainable neighbourhood infrastructure.</p> <p>There has been no planning permission granted with regard to any use other than that linked with the educational function of the overall campus.</p>

Issues	Sub. No.	Executive’s Response & Recommendation
<ul style="list-style-type: none"> <li>• Impact on local roads in terms of access, parking, traffic and noise volume.</li> <li>• There are insufficient amenities for residents.</li> <li>• Safety of students at the college.</li> <li>• Denys students’ full benefits of the site.</li> <li>• Impact on existing residential amenities.</li> <li>• Impact on wildlife.</li> <li>• Residents have no control over SHD process.</li> </ul>	<p><b><u>B0213</u></b> <b><u>B0508</u></b>  <b><u>B0214</u></b> <b><u>B0509</u></b>  <b><u>B0215</u></b> <b><u>B0513</u></b>  <b><u>B0216</u></b> <b><u>B0514</u></b>  <b><u>B0218</u></b> <b><u>B0516</u></b>  <b><u>B0220</u></b> <b><u>B0519</u></b>  <b><u>B0222</u></b> <b><u>B0528</u></b>  <b><u>B0223</u></b> <b><u>B0530</u></b>  <b><u>B0224</u></b> <b><u>B0532</u></b>  <b><u>B0226</u></b> <b><u>B0534</u></b>  <b><u>B0228</u></b> <b><u>B0548</u></b>  <b><u>B0229</u></b> <b><u>B0551</u></b>  <b><u>B0231</u></b> <b><u>B0553</u></b>  <b><u>B0233</u></b> <b><u>B0566</u></b>  <b><u>B0234</u></b> <b><u>B0580</u></b>  <b><u>B0235</u></b> <b><u>B0603</u></b>  <b><u>B0237</u></b> <b><u>B0607</u></b>  <b><u>B0238</u></b> <b><u>B0609</u></b>  <b><u>B0240</u></b> <b><u>B0614</u></b>  <b><u>B0241</u></b> <b><u>B0615</u></b>  <b><u>B0242</u></b> <b><u>B0617</u></b>  <b><u>B0243</u></b> <b><u>B0618</u></b>  <b><u>B0245</u></b> <b><u>B0626</u></b>  <b><u>B0246</u></b> <b><u>B0631</u></b>  <b><u>B0251</u></b> <b><u>B0632</u></b>  <b><u>B0252</u></b> <b><u>B0635</u></b>  <b><u>B0255</u></b> <b><u>B0636</u></b>  <b><u>B0256</u></b> <b><u>B0639</u></b>  <b><u>B0257</u></b> <b><u>B0640</u></b>  <b><u>B0258</u></b> <b><u>B0642</u></b>  <b><u>B0262</u></b> <b><u>B0648</u></b>  <b><u>B0263</u></b> <b><u>B0649</u></b>  <b><u>B0265</u></b> <b><u>B0650</u></b>  <b><u>B0267</u></b> <b><u>B0673</u></b></p>	<p>Having regard to the above, the overall campus, including the lands at the Edmund Rice Schools Trust, should remain zoned ‘SNI’. The ownership and/or sale of lands is not a County Development Plan matter.</p> <p>As set out in Table 13.1.7 (pg. 306), Chapter 13 of the Draft Plan, a number of uses are both permitted in principle and open for consideration under the land use zoning Objective SNI – <i>“To protect, improve and encourage the provision of sustainable neighbourhood infrastructure.”</i> Uses include ‘Education’ being permitted in principle and ‘Residential’ being open for consideration.</p> <p>Educational uses are considered to be an integral part of sustainable neighbourhood infrastructure. Policy Objective PHP2: Sustainable Neighbourhood Infrastructure, Chapter 4 in the Draft Plan seeks to protect and facilitate improvements to existing SNI facilities. In addition, Policy Objective PHP7: Schools, in Chapter 4 of the Draft Plan supports the provision of school facilities and the development / redevelopment of existing schools. In this regard, the Draft Plan would be generally supportive of any improvement to the school and/or its facilities, including its pitches.</p> <p>It is acknowledged that there will be sites in the County subject to the SNI zoning objective that may be capable of accommodating other forms of development whilst still protecting existing SNI facilities and the recreational value of such sites. The Draft Plan includes a number of Policy Objectives and guidance aimed at protecting and/or improving SNI facilities / uses, these are set out in Chapters 4 and 12 and include:</p> <ul style="list-style-type: none"> <li>• Policy Objective PHP2: ‘Sustainable Neighbourhood Infrastructure’ which seeks to protect and facilitate improvements to existing SNI facilities.</li> <li>• Policy Objective PHP7: ‘Schools’ which supports the provision and/or improvement of school facilities.</li> </ul> <p>All proposed development on lands zoned SNI will be subject to compliance with the requirements of Section 12.3.2.1 ‘Development within Sustainable Neighbourhood Infrastructure Lands.’ In this regard, any non-SNI related development within lands zoned</p>

Issues	Sub. No.	Executive’s Response & Recommendation
	<u><b>B0268</b></u> <u><b>B0680</b></u>	<p>Objective SNI should be justified in terms of the suitability of the site and how any such development would not impact upon the existing SNI use and/or function of the land parcel.</p> <p>It is not considered appropriate to identify SNI sites or parameters that render a site suitable for development, rather, this will be assessed through the development management process.</p> <p>In formulating this response the Executive have in accordance with section 12 (8) (b) (iii) of the Planning and Development Act, 2000, (as amended) taken account of the strategic direction received from the members at pre-draft stage <i>“To request that the Chief Executive enhance the existing County Development Plan policies in regard to the protection of recreational and community spaces and infrastructure including areas currently with an INST objective”</i>.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
	<u><b>B0270</b></u> <u><b>B0696</b></u>	
	<u><b>B0273</b></u> <u><b>B0730</b></u>	
	<u><b>B0275</b></u> <u><b>B0731</b></u>	
	<u><b>B0277</b></u> <u><b>B0732</b></u>	
	<u><b>B0278</b></u> <u><b>B0770</b></u>	
	<u><b>B0280</b></u> <u><b>B0771</b></u>	
	<u><b>B0281</b></u> <u><b>B0772</b></u>	
	<u><b>B0282</b></u> <u><b>B0781</b></u>	
	<u><b>B0285</b></u> <u><b>B0798</b></u>	
	<u><b>B0286</b></u> <u><b>B0816</b></u>	
	<u><b>B0288</b></u> <u><b>B0826</b></u>	
	<u><b>B0290</b></u> <u><b>B0832</b></u>	
	<u><b>B0291</b></u> <u><b>B0834</b></u>	
	<u><b>B0294</b></u> <u><b>B0835</b></u>	
	<u><b>B0295</b></u> <u><b>B0870</b></u>	
	<u><b>B0296</b></u> <u><b>B0871</b></u>	
	<u><b>B0297</b></u> <u><b>B0915</b></u>	
	<u><b>B0298</b></u> <u><b>B0935</b></u>	
	<u><b>B0299</b></u> <u><b>B1008</b></u>	
	<u><b>B0300</b></u> <u><b>B1048</b></u>	
	<u><b>B0301</b></u> <u><b>B1053</b></u>	
	<u><b>B0303</b></u> <u><b>B1071</b></u>	
	<u><b>B0304</b></u> <u><b>B1074</b></u>	
	<u><b>B0305</b></u> <u><b>B1078</b></u>	
	<u><b>B0308</b></u> <u><b>B1083</b></u>	
	<u><b>B0309</b></u> <u><b>B1090</b></u>	
	<u><b>B0310</b></u> <u><b>B1092</b></u>	
	<u><b>B0312</b></u> <u><b>B1110</b></u>	
	<u><b>B0313</b></u> <u><b>B1121</b></u>	
	<u><b>B0316</b></u> <u><b>B1153</b></u>	
	<u><b>B0317</b></u> <u><b>B1166</b></u>	
	<u><b>B0320</b></u> <u><b>B1175</b></u>	
	<u><b>B0329</b></u> <u><b>B1207</b></u>	

Issues	Sub. No.	Executive’s Response & Recommendation
	<p><b><u>B0330</u></b>    <b><u>B1216</u></b>  <b><u>B0333</u></b>    <b><u>B1218</u></b>  <b><u>B0335</u></b>    <b><u>B1240</u></b>  <b><u>B0339</u></b></p>	
<p>iii) Submission seeks the rezoning of part of ‘One Vico’, Vico Road from F to A and modify the line of the O/O objective to include the additional residentially zoned land.</p>	<p><b><u>B0560</u></b></p>	<p>The Executive notes the issue raised.</p> <p>Land use zoning objectives can cross property boundaries as ownership of any site is not a Development Plan matter.</p> <p>The land at ‘One Vico’, Vico Road, is located within lands zoned both objective ‘A’ – <i>“To provide residential development and/or protect and improve residential amenity”</i> and objective ‘F’ – <i>“To preserve and provide for open space with ancillary active recreational amenities.”</i></p> <p>The property contains a dwelling and its associated gardens and vehicular access. The ‘F’ zoning objective pertains to an existing garden area, while the existing dwelling is located within lands zoned objective ‘A’. The application of ‘F’ zoned lands within the subject garden does not purport to it being, or forming part of, publicly accessible open space.</p> <p>It is considered that this portion of the property functions as ‘open space’ and ‘recreation’ space associated within the dwelling.</p> <p>Section 13.1.7 ‘Non-Conforming Uses’ in Chapter 13 states: <i>“Throughout the County there are uses which do not conform to the zoning objective for the area. All such uses, where legally established (the appointed day being 1 October 1964) or were in existence longer than 7 years, shall not be subject to proceedings under the Act in respect of continuing use. When extensions to, or improvements of, premises accommodating such uses are proposed, each shall be considered on their merits, and permission may be granted where the proposed development does not adversely affect the amenities of premises in the vicinity and does not prejudice the proper planning and sustainable development of the area.”</i></p> <p>Having regard to the function of the subject lands and the provisions of Section 13.1.7 in the Draft Plan, it is not considered necessary to change the zoning objective of the garden area.</p>

Issues	Sub. No.	Executive’s Response & Recommendation
<p>iv) Submission requests retention of E zone on the strategic industrial Amgen site on Pottery Road. It is considered that the SNI zoning would contravene permission granted under Reg. Ref. D19A/ and prevent the expansion of the Amgen site.</p> <p>Original purpose of the ‘E’ zoning was, and should continue to be, to support industrial based activity such as that undertaken by Amgen Technology</p> <p>Request rezoning of permitted car parking area at NRH back to E as current proposed zoning objective SNI does not support the expansion of economic / employment uses or the expansion of pharmaceutical manufacturing and ancillary facilities as currently permitted.</p>	<p><b><u>B0643</u></b>  <b><u>B0857</u></b>  <b><u>B1160</u></b>  <b><u>B1241</u></b></p>	<p><b>Recommendation</b>                      No change to Draft Plan.</p> <p>The Executive notes the issue raised.</p> <p>The Draft Plan introduces a new land use zoning objective – SNI – “To protect, improve and encourage the provision of sustainable neighbourhood infrastructure”. This new land use zoning, Objective SNI, has been applied to:</p> <ul style="list-style-type: none"> <li>• Land parcels that contain existing SNI facilities together with its associated amenity / recreational space, e.g. schools, community facilities, places of worship and their associated parish / cultural centres, health care facilities.</li> <li>• Lands zoned objective ‘MH’ in the current 2016-2022 plan have also been zoned Objective SNI.</li> <li>• Lands with an extant planning permission for a new SNI facility – as in the case with lands in Ballyogan where a new school has been permitted.</li> </ul> <p>The SNI land use zoning objective seeks to protect or improve existing SNI facilities / uses and identifies existing facilities. An aim of the SNI zoning objectives are to ensure that both existing and emerging residential areas are provided with and can continue to be served by an adequate level and an appropriate range of supporting social and community infrastructure.</p> <p>The SNI land use zoning objective replaces the ‘MH’ zoning in the current plan at the National Rehabilitation Hospital and extends along Pottery Road replacing lands currently zoned ‘E’ in the current plan located to the rear / southwest and within the existing hospital campus.</p> <p>On map 7 of the Draft Plan, these lands are zoned objective ‘SNI’ – “<i>To Protect, improve and encourage the provision of sustainable neighbourhood infrastructure</i>” and are subject to Specific Local Objective (SLO) 72 which states: “<i>That a green buffer zone will be provided on the inside of the new boundary along Pottery Road on lands zoned ‘SNI’. This green buffer zone will be extensively landscaped with trees and shrubs and will be 5 metre wide opposite ‘E’ zoned lands and 9 metres wide opposite ‘A’ zoned lands.</i>”</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>In order to determine which lands and/or facilities are associated with the primary SNI use, boundaries used in planning histories have been reviewed and have been used in the application of the SNI zoning objective.</p> <p>It is noted that a car park for the area in question has been permitted under Reg. Ref. D19A/0904. The permitted car park is associated with the employment use at Amgen and not the hospital. Table 13.1.7 'Zoning Objective 'SNI' in Chapter 13 only permits a car park in principle if it is connected with SNI use.</p> <p>It is noted that an illustrative site strategy for the hospital re-development has been set out in a submission from HSE ref. <b>B1160</b>, which shows that no development is planned in the area of the permitted carpark. The application of the 'E' zoning objectives where the car park has been permitted would not prevent the hospital from expanding into this area should the need arise in the future as 'hospital' is permitted in principle within the 'E' zoning objective as set out in Table 13.1.13 'Zoning Objective 'E' in Chapter 13.</p> <p>Having regard to the planning history permitted use on site and Table 13.1.3 in the Draft Plan, it is considered reasonable to rezone the permitted car park area under Reg. Ref. D19A/0904 from 'SNI' to 'E'.</p> <p><b>Recommendation</b> Amend Map 7 to rezone the area of car parking within the hospital lands, along Pottery Road from 'SNI' to 'E'.</p>
v) Submission requests that lands at The Park neighbourhood centre, Cabinteely be rezoned from F to NC as no justification has been provided for the change and the area is not deficient of open space.	<b><u>B0962</u></b>	<p>The Executive agrees with the issue raised.</p> <p>The subject lands are associated with an existing neighbourhood centre and would facilitate the expansion of or add to the mix of uses already contained within the neighbourhood centre. As the lands are located adjacent to Cabinteely Park, there is no requirement to provide additional open space and/or recreational amenity facilities to serve the area.</p> <p><b>Recommendation</b> Amend map 7 to rezone area from F to NC</p>
vi) Submission requests that consideration is given to the zoning of lands at the National Rehabilitation	<b><u>B1066</u></b>	<p>The Executive notes the issue raised. The land use zoning objective of the subject land is Objective 'A' - "To provide residential development and/or protect and improve residential</p>

Issues	Sub. No.	Executive's Response & Recommendation
Hospital on Rochestown Avenue for a permanent school site for a new school for the Sallynoggin/Killiney-Dún Laoghaire school planning area.		amenity". As per Table 13.1.2 in Chapter 13: 'Land Use Zoning' in the Draft Plan, 'education' is permitted in principle within lands zoned objective 'A.' It is, therefore, not considered necessary to rezone this site in order to facilitate a school.  <b>Recommendation</b> No change to Draft Plan.
<b>3.31.8: Map 9</b>		
i) Requests the re-zoning of lands at Ballyogan Road, Carrickmines from Objective 'E' to Objective 'A'.	<b><u>B0071</u></b>	The Executive does not agree with the issue raised.  The subject area to the south of the Ballyogan Road is characterised by a clustering of employment types with a number of municipal and utilities employers and also a range of small businesses in former residential plots/properties as well as the Ballyogan Business Park. The employment uses within this area are considered to be broadly compatible in terms of use and impacts. It is considered that the existing uses perform an important employment function and the Local Authority supports their on-going role in this regard.  Section 2.4.8.4 of the Draft Plan provides an evidence-based analysis to estimate the requirement for employment zoned lands in the County. The analysis found that while there was a sufficient quantum of employment zoned lands available to facilitate continued economic development and employment growth in the County over the Plan period, that the extent of the employment landbank in DLR was quite low in comparison to adjoining Counties in the MASP area and as such, there is an enhanced need to retain and protect these lands for employment purposes.  It is noted that a significant portion of the lands are identified in Flood Zone B – see Map 9 of the Strategic Flood Risk Assessment of the Draft Plan.  The Executive supports the retention and protection of the subject lands for continued employment use.  <b>Recommendation</b> No change to Draft Plan.
ii) Requests the re-zoning of lands at Glenamuck Road from zoning Objective 'F' to zoning Objective	<b><u>B0589</u></b>	The Executive does not agree with the issue raised.

Issues	Sub. No.	Executive's Response & Recommendation
'A'. The lands comprise a playing pitch, car parking area and ancillary changing room buildings.		<p>It is considered that sports and recreational facilities – both public and privately owned - are of significant importance in providing for the active recreational needs of existing and emerging communities. The Executive does not support the re-zoning of such a use in what is one of the most rapidly growing parts of the County. It is highlighted that the Objective 'F' zoning is not exclusive to publicly owned land. Notwithstanding the landowner's infrequency of use or need for the sports grounds, there is a significant need for such facilities in the County, including the Kiltiernan-Glenamuck area.</p> <p>Policy Objective OSR10 of the Draft Plan 'Protection of Sports Grounds / Facilities' is of particular relevance in the context of the zoning request.</p> <p><i>'Policy Objective OSR10: Protection of Sports Grounds/Facilities It is a Policy Objective:</i></p> <ul style="list-style-type: none"> <li>• <i>To ensure that adequate playing fields for formal active recreation are provided for in new development areas.</i></li> <li>• <i>That existing sports facilities and grounds within the established urban area are protected, retained, and enhanced.</i></li> <li>• <i>To increase the number of playing pitches in the County.</i></li> <li>• <i>To maximise the use of playing pitches in the County and for playing pitches to be utilised seven days a week, subject to protecting adjoining residential amenity.'</i></li> </ul> <p>It is considered that the existing zoning of the lands as Objective 'F', and its established use as a sports grounds, supports the approach to the creation of sustainable communities as promoted in Chapter 4 of the Draft Plan, and furthermore, supports the Strategic County Outcomes which underpin the Vision for the County Development Plan including, in particular, the creation of an inclusive and healthy County and the creation of a network of liveable Towns and Villages.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
iii) Requests the rezoning of c. 2.16 hectares of land located to the west of the Enniskerry Road in Kiltiernan from Objective 'G' to Objective 'A'.	<b>B0590</b>	<p>The Executive does not agree with the issue raised.</p> <p>The greenfield lands proposed for rezoning are effectively an accretion to already zoned residential lands which form part of the Kiltiernan-Glenamuck Local Area Plan. A Residential</p>

Issues	Sub. No.	Executive’s Response & Recommendation
		<p>Development Capacity Audit was undertaken in order to inform the preparation of the Core Strategy of the Draft Plan and, as indicated in Table 2.8 of Chapter 2, there are approximately 60 hectares of zoned land in the Kiltiernan-Glenamuck Local Area Plan area, which are, or may become available, for residential development. The majority of the Kiltiernan-Glenamuck LAP lands are currently undeveloped.</p> <p>Objective ‘G’ zoned lands - ‘To protect and improve high amenity areas’ - are the most sensitive and highly protected areas in the County. The selection of lands for high amenity zoning was originally based on, among other factors, their elevation, landscape quality and views and prospects. It is not considered that there is any compelling reason to re-zone these high amenity lands in the Draft Plan.</p> <p>Finally, as set out in Section 2.4.4 of the Draft Plan, broad equilibrium exists between the supply of zoned land for primarily residential purposes, and the projected demand for new housing. In accordance with the proposed settlement strategy for the County there are already more than sufficient residentially zoned land to cater for forecast demands and targets set by the RSES. It is not considered warranted to zone additional residential land for the 2022-2028 County Development Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Requests the re-zoning of lands to the south of Ballycorus Road, on the eastern side of the planned distributor road, from Objective ‘B’ to Objective ‘A’.</p>	<p><b><u>B0651</u></b></p>	<p>The Executive does not agree with the issue raised.</p> <p>The greenfield lands proposed for rezoning are effectively an accretion to already zoned residential lands which form part of the Kiltiernan-Glenamuck Local Area Plan. A Residential Development Capacity Audit was undertaken in order to inform the preparation of the Core Strategy of the Draft Plan and, as indicated in Table 2.8 of Chapter 2, there are approximately 60 hectares of zoned land in the Kiltiernan-Glenamuck Local Area Plan area, which are, or may become available, for residential development. The majority of the Kiltiernan-Glenamuck LAP lands are currently undeveloped.</p> <p>As set out in Section 2.4.4 of the Draft Plan, broad equilibrium exists between the supply of zoned land for primarily residential purposes, and the projected demand for new housing. In accordance with the proposed settlement strategy for the County there are already more</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>than sufficient residentially zoned land to cater for forecast demands and targets set by the RSES. It is not considered warranted to zone additional residential land for the 2022-2028 County Development Plan.</p> <p>Finally, it is noted that the Loughlinstown River traverses the lands and a portion of the area is identified in Flood Zone A and Flood Zone B – see Map 9 of the Strategic Flood Risk Assessment of the Draft Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>v) Requests the rezoning of a 0.7 hectare plot of land located in the townland of Kiltiernan from Objective 'B' to Objective 'A'.</p>	<p><b><u>B0688</u></b></p>	<p>The Executive does not agree with the issue raised.</p> <p>The lands proposed for rezoning at Ballycorus Road are located in an area wholly zoned Objective 'B', at a remove from the nearest identified 'New Residential Community' at Kiltiernan-Glenamuck. It is considered that the proposed re-zoning of the lands to Objective 'A' would comprise an un-coordinated and unplanned approach to sustainable growth inconsistent with the primary Strategic County Outcomes of the Draft Plan, as set out in Section 1.7, and the Settlement Strategy for the County set out in Section 2.4.2.</p> <p>Finally, it is noted that the Loughlinstown River traverses the south of the lands and a portion of the area is identified in Flood Zone A and Flood Zone B – see Map 9 of the Strategic Flood Risk Assessment of the Draft Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>vi) Requests the re-zoning of lands at Stepside Village, on a site known as Mountain View, from Objective 'F' to Objective 'A'. Alternatively, and without prejudice to the primary rezoning request, it is requested the site be re-zoned to Objective 'SNI', rather than the existing Objective 'F' with site specific objective - SLO 87.</p>	<p><b><u>B0787</u></b></p>	<p>The Executive does not agree with the submission.</p> <p>The subject lands are zoned Objective 'F' – <i>'To preserve and provide for open space with ancillary active recreational amenities'</i>. In addition, the lands include a Specific Local Objective (No. 87) which provides the following:</p> <p><i>'To seek the development of a multi-purpose, multi-functional community centre south of Enniskerry Road proximate to the Stepside Village Neighbourhood Centre.'</i></p>

Issues	Sub. No.	Executive’s Response & Recommendation
		<p>It is highlighted that ‘Community Facility’ is ‘Permitted in Principle’ on Objective ‘F’ zoned land.</p> <p>The proximity of complementary uses will aid in the delivery of successful sustainable communities in the County and it is considered that the existing Objective ‘F’ zoning – in tandem with SLO 87 – supports the potential for open space, recreational and community land uses located at the heart of the neighbourhood. With regard to the request to re-zone the lands ‘SNI’ it is considered that the intended uses associated with SLO 87 are appropriately supported under the existing zoning Objective ‘F’. In addition, notwithstanding the SLO for a future community centre, no extant permission exists, and the lands therefore do not meet the criteria as set out elsewhere in this report for designation under the proposed new ‘SNI’ land use zoning objective.</p> <p>Furthermore, as set out in Section 2.4.4 of the Draft Plan, broad equilibrium exists between the supply of zoned land for primarily residential purposes, and the projected demand for new housing. In accordance with the proposed settlement strategy for the County there are already more than sufficient residentially zoned land to cater for forecast demands and targets set by the RSES. It is not considered warranted to zone additional residential land for the 2022-2028 County Development Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>vii) Requests the re-zoning of lands at Springton, Glenamuck Road, Carrickmines, from Objective ‘G’ to Objective ‘A2’.</p>	<p><b><u>B0828</u></b></p>	<p>The Executive does not agree with the issue raised.</p> <p>The greenfield lands proposed for rezoning are located adjacent to lands primarily comprising Objective ‘G’ and Objective ‘B’ zonings. While the lands are proximate to both the Ballyogan and Environs and Kiltiernan-Glenamuck Local Area Plan boundaries, there is a significant quantum of lands identified in both of these areas for residential development. A Residential Development Capacity Audit was undertaken in order to inform the preparation of the Core Strategy of the Draft Plan and, as indicated in Table 2.8 of Chapter 2, there are over 130 hectares of zoned land in the Kiltiernan-Glenamuck and Ballyogan Local Area Plan areas, which are, or may become available, for residential development.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>It is highlighted that Objective 'G' zoned lands - 'To protect and improve high amenity areas' - are the most sensitive and highly protected areas in the County. The selection of lands for high amenity zoning was originally based on, among other factors, their elevation, landscape quality and views and prospects. It is not considered that there is any compelling reason to re-zone these high amenity lands in the Draft Plan.</p> <p>As set out in Section 2.4.4 of the Draft Plan, broad equilibrium exists between the supply of zoned land for primarily residential purposes, and the projected demand for new housing. In accordance with the proposed settlement strategy for the County there are already more than sufficient residentially zoned land to cater for forecast demands and targets set by the RSES. It is not considered warranted to zone additional residential land for the 2022-2028 County Development Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
viii) Requests the re-zoning of lands to the rear of the Mill House, which is located to the west of the Enniskerry Road in Kiltiernan, from Objective 'G' to Objective 'A'. It is also requested that the Kiltiernan LAP boundary be extended to include the lands.	<b>B0875</b>	<p>The Executive does not agree with the submission.</p> <p>The lands proposed for rezoning are effectively an accretion to already zoned residential lands which form part of the Kiltiernan-Glenamuck Local Area Plan. A Residential Development Capacity Audit was undertaken in order to inform the preparation of the Core Strategy of the Draft Plan and, as indicated in Table 2.8 of Chapter 2, there are approximately 60 hectares of zoned land in the Kiltiernan-Glenamuck Local Area Plan area, which are, or may become available, for residential development. The majority of the Kiltiernan-Glenamuck LAP lands are currently undeveloped. The Executive does not support the request to expand the existing Kiltiernan-Glenamuck LAP boundary to incorporate additional lands at this juncture.</p> <p>Objective 'G' zoned lands - 'To protect and improve high amenity areas' - are the most sensitive and highly protected areas in the County. The selection of lands for high amenity zoning was originally based on, among other factors, their elevation, landscape quality and views and prospects. It is not considered that there is any compelling reason to re-zone these high amenity lands in the Draft Plan.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>As set out in Section 2.4.4 of the Draft Plan, broad equilibrium exists between the supply of zoned land for primarily residential purposes, and the projected demand for new housing. In accordance with the proposed settlement strategy for the County there are already more than sufficient residentially zoned land to cater for forecast demands and targets set by the RSES. It is not considered warranted to zone additional residential land for the 2022-2028 County Development Plan.</p> <p>Finally, it is highlighted that a significant portion of the subject lands are identified in Flood Zone A – see Map 9 of the Strategic Flood Risk Assessment of the Draft Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ix) Notes that the Kiltiernan-Glenamuck area has sufficient land rezoned to cope with the medium-term future needs of the area. The land west of the Enniskerry must not be further re-zoned.</p> <p>Does not support the re-zoning of lands in the Kiltiernan area on the Enniskerry Road to Objective 'A' residential and supports its retention as a rural area.</p>	<p><b><u>B0475</u></b> <b><u>B0743</u></b></p>	<p>The Executive noted the issue raised.</p> <p>The Draft Plan (and Chief Executive's Report) does not include any proposals to re-zone additional land for residential development in the Kiltiernan-Glenamuck area or along the Enniskerry Road. In relation to existing zoned lands, the Kiltiernan-Glenamuck Local Area Plan provides the local level planning framework to ensure the area develops in a plan-led manner.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>x) Requests the re-zoning of lands at Farmer Browns Public House, Enniskerry Road, Kiltiernan, and lands to the west and south of the Public House from Objective 'A' Residential to Objective 'NC' Neighbourhood Centre, in line with the Kiltiernan Glenamuck LAP.</p>	<p><b><u>B0926</u></b></p>	<p>The Executive does not agree with the submission.</p> <p>The rationale for reducing the scale of the Objective 'NC' (Neighbourhood Centre) lands at Kiltiernan – that occurred through the plan-making process of the 2016 County Development Plan - was to harmonise the scale of the Neighbourhood Centres to a greater degree across the County. It is highlighted that there is a significant quantum of c. 4 hectares of undeveloped Objective 'NC' zoned land currently identified in the Draft Plan in the Kiltiernan-Glenamuck area. The current zoned quantum of 'NC' lands at Kiltiernan is considered appropriate to serve the 'New Residential Community' at Kiltiernan-Glenamuck.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>Furthermore, planning permission has been granted at The Park, Carrickmines for a Neighbourhood Centre including two supermarkets and retail services which will also serve population located in the Kiltiernan-Glenamuck area.</p> <p>The lands subject of the submission are zoned Objective 'A'. It is highlighted that a range of commercial uses are considered 'Open for Consideration' at such lands under the Draft Plan including inter alia: 'Public House', 'Restaurant'; 'Shop Neighbourhood'; and, 'Tea Room/Café'.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xi) Requests the re-zoning of lands to the south east of Glenamuck Road from Objective 'B' to Objective 'A', and additional parcels of land from Objective 'G' to Objective 'F'. Alternatively, the submission seeks the designation of the lands as a Strategic Land Reserve.</p>	<p><b><u>B1010</u></b></p>	<p>The Executive does not agree with the submission.</p> <p>The greenfield lands proposed for rezoning are effectively an accretion to already zoned residential lands which form part of the Kiltiernan-Glenamuck Local Area Plan. A Residential Development Capacity Audit was undertaken in order to inform the preparation of the Core Strategy of the Draft Plan and, as indicated in Table 2.8 of Chapter 2, there are approximately 60 hectares of zoned land in the Kiltiernan-Glenamuck Local Area Plan area, which are, or may become available, for residential development. The majority of the Kiltiernan-Glenamuck LAP lands are currently undeveloped.</p> <p>As set out in Section 2.4.4 of the Draft Plan, broad equilibrium exists between the supply of zoned land for primarily residential purposes, and the projected demand for new housing. In accordance with the proposed settlement strategy for the County there are already more than sufficient residentially zoned land to cater for forecast demands and targets set by the RSES. It is not considered warranted to zone additional residential land for the 2022-2028 County Development Plan.</p> <p>With regard to the Objective 'G' component of the lands, these are the most sensitive and highly protected areas in the County. The selection of lands for high amenity zoning was originally based on, among other factors, their elevation, landscape quality and views and prospects. It is not considered that there is any compelling reason to re-zone these high amenity lands in the Draft Plan from Objective 'G' to Objective 'F' (as supporting open space</p>

Issues	Sub. No.	Executive’s Response & Recommendation
		<p>for residential) particularly as the rezoning request from Objective ‘B’ to Objective ‘A’ is not supported. Open space as a use is permitted in principle on lands subject to the ‘G’ Objective.</p> <p>The Draft Plan includes a Strategic Land Reserve (SLR) to meet designated future growth as allocated to the County under NPO 68 of the NPF. Notwithstanding the argument put forward in the submission, there is no requirement for a further SLR designation in the Kiltiernan area.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xii) Requests the re-zoning of lands in Kiltiernan from Objective ‘B’ to Objective ‘A’. Requests that should DLR not re-zone the lands Objective ‘A’, that the lands be identified a Strategic Land Reserve.</p>	<p><b><u>B1045</u></b></p>	<p>The Executive does not agree with the submission.</p> <p>The greenfield lands proposed for rezoning are effectively an accretion to already zoned residential lands which form part of the Kiltiernan-Glenamuck Local Area Plan. A Residential Development Capacity Audit was undertaken in order to inform the preparation of the Core Strategy of the Draft Plan and, as indicated in Table 2.8 of Chapter 2, there are approximately 60 hectares of zoned land in the Kiltiernan-Glenamuck Local Area Plan area, which are, or may become available, for residential development. The majority of the Kiltiernan-Glenamuck LAP lands are currently undeveloped.</p> <p>As set out in Section 2.4.4 of the Draft Plan, broad equilibrium exists between the supply of zoned land for primarily residential purposes, and the projected demand for new housing. In accordance with the proposed settlement strategy for the County there are already more than sufficient residentially zoned land to cater for forecast demands and targets set by the RSES. It is not considered warranted to zone additional residential land for the 2022-2028 County Development Plan.</p> <p>The Executive does not recommend the lands be designated a Strategic Land Reserve. As set out in Section 2.3.2 of the Draft Plan the population allocation and housing target for the Core Strategy already incorporates a range of modifiers including population ‘headroom’ which serves as a means of zoning residential land beyond the six year period of the County Development Plan. It is highlighted that the Strategic Land Reserve identified in the Draft Plan at Old Connaught North pertains to the specific circumstances relating to the allocation</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>of additional population by the EMRA to the Key Town of Bray under NPO 68 of the NPF (see Section 2.4.5).</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xiii) Requests the re-zoning of lands at Glenamuck from Objective 'B' and Objective 'G' to Objective 'A' and Objective 'F'.</p> <p>Should the Council consider that zoning Objective 'A' can't be applied to the full extent of the lands, it is requested that the lands within the boundary of the Kiltiernan / Glenamuck LAP be re-zoned Objective 'A', and the remaining lands designated a Strategic Land Reserve.</p>	<p><b>B1057</b></p>	<p>The Executive does not agree with the submission.</p> <p>The greenfield lands proposed for rezoning are effectively an accretion to already zoned residential lands which form part of the Kiltiernan-Glenamuck Local Area Plan. A Residential Development Capacity Audit was undertaken in order to inform the preparation of the Core Strategy of the Draft Plan and, as indicated in Table 2.8 of Chapter 2, there are approximately 60 hectares of zoned land in the Kiltiernan-Glenamuck Local Area Plan area, which are, or may become available, for residential development. The majority of the Kiltiernan-Glenamuck LAP lands are currently undeveloped.</p> <p>With regard to the Objective 'G' component of the lands, these are the most sensitive and highly protected areas in the County. The selection of lands for high amenity zoning was originally based on, among other factors, their elevation, landscape quality and views and prospects. It is not considered that there is any compelling reason to re-zone these high amenity lands in the Draft Plan from Objective 'G' to Objective 'F' (as supporting open space) particularly as the rezoning request from Objective 'B' to Objective 'A' is not supported. Open space as a use is permitted in principle on lands subject to the 'G' Objective.</p> <p>As set out in Section 2.4.4 of the Draft Plan, broad equilibrium exists between the supply of zoned land for primarily residential purposes, and the projected demand for new housing. In accordance with the proposed settlement strategy for the County there are already more than sufficient residentially zoned land to cater for forecast demands and targets set by the RSES. It is not considered warranted to zone additional residential land for the 2022-2028 County Development Plan.</p> <p>Finally, the Executive does not recommend the designation of part of the lands as a Strategic Land Reserve. As set out in Section 2.3.2 of the Draft Plan the population allocation and housing target for the Core Strategy already incorporates a range of modifiers including population 'headroom' which serves as a means of zoning residential land beyond the six</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>year period of the County Development Plan. It is highlighted that the Strategic Land Reserve identified in the Draft Plan at Old Connaught North pertains to the specific circumstances relating to the allocation of additional population by the EMRA to the Key Town of Bray under NPO 68 of the NPF (see Section 2.4.5).</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xiv) Request rezoning of lands at Ticknick from Objective B and Objective G to Objective F: To preserve and provide for Open Space with ancillary active recreational amenities. (Note: Lands are on both maps 9 and 10 in the Draft Plan)</p>	<p><b><u>B1067</u></b></p>	<p>The Executive would not agree with the rezoning request. The request relates to lands which are as stated in the submissions proposed as an expansion of the permitted Ticknick Park in Cherrywood. The lands fall outside the SDZ Planning Scheme. As open space is permitted in principle in the B (to protect and improve rural amenity and to provide for the development of agriculture) land use zoning objective and is the only use permitted in principle in the G (to protect and improve high amenity areas) land use zoning objective it is not considered that there is any necessity to rezone these lands.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xv) Submission requests the re-zoning of lands to the west of the Enniskerry Road in the Kiltiernan-Glenamuck area from Objective 'B' to Objective 'A'. In addition, it is requested that the boundary of the Kiltiernan LAP be expanded to incorporate the lands.</p>	<p><b><u>B1087</u></b></p>	<p>The Executive does not agree with the submission.</p> <p>The lands proposed for rezoning are effectively an accretion to already zoned residential lands which form part of the Kiltiernan-Glenamuck Local Area Plan. A Residential Development Capacity Audit was undertaken in order to inform the preparation of the Core Strategy of the Draft Plan and, as indicated in Table 2.8 of Chapter 2, there are approximately 60 hectares of zoned land in the Kiltiernan-Glenamuck Local Area Plan area, which are, or may become available, for residential development. The majority of the Kiltiernan-Glenamuck LAP lands are currently undeveloped. The Executive does not support the request to expand the existing Kiltiernan LAP boundary to incorporate additional lands at this juncture.</p> <p>As set out in Section 2.4.4 of the Draft Plan, broad equilibrium exists between the supply of zoned land for primarily residential purposes, and the projected demand for new housing. In accordance with the proposed settlement strategy for the County there are already more than sufficient residentially zoned land to cater for forecast demands and targets set by the</p>

Issues	Sub. No.	Executive’s Response & Recommendation
		<p>RSES. It is not considered warranted to zone additional residential land for the 2022-2028 County Development Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xvi) Submission raises issues that cross referencing between the current Ballyogan and Environs Local Area Plan (LAP) and the Draft County Development Plan and requests updating of cross referencing.</p> <p>Request an area at Kilgobbin heights be rezoned F to protect line of trees/hedgerows.</p>	<p><b>B1198</b></p>	<p>The Executive notes the issue raised.</p> <p>The submission is drawing attention to the fact that when the new County Plan is adopted references to the current Plan in the Ballyogan LAP (BELAP) will no longer be referencing the up to date County Development Plan. Due to the timing of LAP and CPD Plan preparation this is an issue that occurs not only for the BELAP but also for other Local Area Plans. However, any assessment of a planning application which falls within a LAP would have regard to the objectives of the LAP but must also have regard to the relevant parent County Development Plan in place at the time. In terms of the hierarchy of Plans the County Development Plan is the parent plan. It is not possible to amend any Local Area Plan as part of the County Development Plan process.</p> <p>In relation to the request for rezoning from A to F to protect the existing trees at Kilgobbin Heights, generally, on the County Development Plan maps, where there are trees and hedgerow worthy of retention, in accordance with Policy Objective OSR7: Trees, Woodland and Forestry, these are delineated by way of a tree symbols – <i>To protect and preserve Trees and Woodlands</i> - as opposed to land use zoning objective F. In the area in question 3 trees symbols are already depicted on the Draft Plan maps. The submission contends that these symbols do not adequately illustrate that there is a continuous stand of mature trees and hedgerow running for the entire length of the boundary.</p> <p>The submission illustrates by way of a labelled aerial photo two other areas which have lines of trees which are zoned objective F in the Draft Plan. However, these areas of proposed open space which align with the BELAP site framework for Kilgobbin cover specific areas that are identified as buffer corridors in the LAP and in one instance cover an area specifically earmarked for the retention of an ecological corridor. The BELAP does not show the area subject to the current zoning request as an open space or buffer corridor although SDF Objective 9 of the LAP is to retain the “<i>significant band of mature trees and associate undergrowth and hedgerows abutting the eastern flank of the Kilgobbin heights estate</i>”</p>

Issues	Sub. No.	Executive’s Response & Recommendation
		<p>Having regard to the objectives of the LAP, and the fact that tree symbols, as opposed to land use zoning objective F, are used to protect important stands of trees, it is not considered warranted that the lands in question be rezoned to <i>objective F – To preserve and provide for open space with ancillary active recreational amenities</i>” It is however, recommended that additional trees symbols be added to the Draft Plan maps.</p> <p><b>Recommendation</b>  Amend Map 9 to add additional trees symbols to the rear of houses abutting the eastern flank of the Kilgobbin Heights estate.</p>
<p>xvii) There should be no further zoning for development on Land Use Map No. 9.</p>	<p><b><u>B1199</u></b></p>	<p>The Executive notes the issue raised.</p> <p>The Draft Plan (and Chief Executive’s Report) does not propose to zone any additional lands for development on Land Use Map No. 9, outside of that already zoned under the existing County Development Plan 2016-2022.</p> <p><b>Recommendation</b>  No change to Draft Plan.</p>
<p>xviii) Submission requests the re-zoning of lands at Carrickmines Great from Objective ‘B’ (and a comparatively smaller area of land zoned Objective ‘G’), to Objective ‘E’, in order to facilitate a mixed use development comprising a hospital campus, hotel and non-retail employment.</p>	<p><b><u>B1234</u></b></p>	<p>The Executive does not agree with the submission.</p> <p>The Employment Strategy of the Draft Plan adopts an approach consistent with the RSES Guiding Principles for the Location of Strategic Employment. The overarching Employment Strategy for DLR is set out in Section 2.4.8.5 of the Draft Plan:</p> <p><i>‘In spatial terms, the DLR employment strategy aims to provide for the expansion of employment through the designation of a range of sustainable employment locations. The spatial strategy applies the principles of the circular economy to land-use management through the <u>intensification and redevelopment of existing strategic employment areas within the M50 ring and the activation of key strategic sites such as Cherrywood and Carrickmines which are accessible to public transport. The strategy seeks to align strategic employment locations with existing and identified residential growth areas through high frequency transport and minimise the divergence between the places people live and work, increasing the efficiency of land-use, reducing sprawl and minimising carbon footprint.</u>’</i></p>

Issues	Sub. No.	Executive’s Response & Recommendation
		<p>The request seeks to re-zone a large area of c. 27 hectares of greenfield lands to Objective ‘E’. As supported by the evidence-based analysis in Section 2.4.8.4 of the Draft it is considered that there are already sufficient employment zoned lands, located in accordance with the overarching Employment Strategy set out in Section 2.4.8.5 of the Draft Plan, to provide for the projected additional workforce resident in DLR for the Plan period and beyond.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.31.9: Map 10</b>		
<p>i) Rezone F to A at 68 Oakton Park, Ballybrack</p>	<p><b><u>B0001</u></b></p>	<p>The Executive notes the issue raised.</p> <p>The land in question is located to the northwest of 68 Oakton Park and abuts a footpath located along the western side of Wyattville Road. The land appears to form part of the garden to the side of 68 Oakton Park.</p> <p>Lands at this 68 Oakton Park are zoned both objective ‘A’ – <i>“To provide residential development and/or protect and improve residential amenity”</i> where the dwelling, vehicular access and rear garden is located, and objective ‘F’ – <i>“To preserve and provide for open space with ancillary active recreational amenities”</i> to the side.</p> <p>Section 13.1.7 ‘Non-Conforming Uses’ in Chapter 13 states: <i>“Throughout the County there are uses which do not conform to the zoning objective for the area. All such uses, where legally established (the appointed day being 1 October 1964) or were in existence longer than 7 years, shall not be subject to proceedings under the Act in respect of continuing use. When extensions to, or improvements of, premises accommodating such uses are proposed, each shall be considered on their merits, and permission may be granted where the proposed development does not adversely affect the amenities of premises in the vicinity and does not prejudice the proper planning and sustainable development of the area.”</i></p> <p>Having regard to details provided by the Property Management section of the Council, the lands zoned objective ‘F’ located to the side of the dwelling appear to be in Council ownership. <b>Land use zoning objectives can cross property boundaries as ownership of any site is not a Development Plan matter.</b></p>

Issues	Sub. No.	Executive’s Response & Recommendation
		<p>Having regard to the provisions of Section 13.1.7 in the Draft Plan, it is not considered necessary to change the zoning objective of this area that appears to function as a garden area.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Submission requests that the A zoning and removal of the INST of the eastern parcel of lands is maintained at Saint Laurence College, Wyattville Rd. The submission welcomes the SNI zoning for the remainder of the site, however, considers that the removal of A zoned lands will prevent residential development on the site which would in turn generate income to improve the existing school.</p>	<p><b><u>B0577</u></b></p>	<p>The Executive notes and welcomes the support with regard to the SNI zoning objective, however, disagrees that this zoning applied to the entire site is counteractive to the long-term growth of the school. The Executive also disagree with the contention in the submission that no rationale has been but forward for the rezoning of the site to SNI. The rationale is the SNI zoning is clearly set out in other sections of this report.</p> <p>The Draft Plan introduces a new land use zoning objective – SNI – “To protect, improve and encourage the provision of sustainable neighbourhood infrastructure”. This new land use zoning, Objective SNI, has been applied to:</p> <ul style="list-style-type: none"> <li>• land parcels that contain existing SNI facilities together with its associated amenity / recreational space, e.g. schools, community facilities, places of worship and their associated parish / cultural centres, health care facilities.</li> <li>• lands zoned objective ‘MH’ in the current 2016-2022 plan have also been zoned Objective SNI.</li> <li>• Lands with an extant planning permission for a new SNI facility – as in the case with lands in Ballyogan where a new school has been permitted.</li> </ul> <p>The SNI land use zoning objective seeks to protect or improve existing SNI facilities / uses and identifies existing facilities. An aim of the SNI zoning objectives are to ensure that both existing and emerging residential areas are provided with and can continue to be served by an adequate level and an appropriate range of supporting social and community infrastructure.</p> <p>The portion of land sought to be rezoned to ‘A’ is located to the south of the existing school building/campus. It is noted that the subject lands are currently set out as various pitches including a smaller all weather facility which clearly forms part of the overall school campus.</p>

Issues	Sub. No.	Executive’s Response & Recommendation
		<p>In order to determine which lands and/or facilities are associated with the primary SNI use, boundaries used in planning histories have been reviewed and have been used in the application of the SNI zoning objective.</p> <p>Planning history for the school campus, including the most recent permission granted for the upgrading of pitches under Reg. Ref. D08A/156, incorporates the area sought to be rezoned within the campus boundary.</p> <p>Having regard to the existing function of the area as pitches and planning history it is considered that the land parcel requested to be rezoned to ‘A’ is intrinsically linked with the educational function of the overall campus.</p> <p>There has been no planning permission granted with regard to any use other than that linked with the educational function of the campus.</p> <p>Having regard to the above, the overall school campus, including its pitches and green amenity space should remain zoned ‘SNI’. <b>The ownership and/or sale of lands is not a County Development Plan matter.</b></p> <p>As set out in Table 13.1.7 (pg. 306), Chapter 13 of the Draft Plan, a number of uses are both permitted in principle and open for consideration under the land use zoning Objective SNI – “To protect, improve and encourage the provision of sustainable neighbourhood infrastructure.” Uses include ‘Education’ being permitted in principle and ‘Residential’ being open for consideration.</p> <p>Educational uses are considered to be an integral part of sustainable neighbourhood infrastructure. Policy Objective PHP2: Sustainable Neighbourhood Infrastructure, Chapter 4 in the Draft Plan seeks to protect and facilitate improvements to existing SNI facilities. In addition, Policy Objective PHP7: Schools, in Chapter 4 of the Draft Plan supports the provision of school facilities and the development / redevelopment of existing schools. In this regard, the Draft Plan would be generally supportive of any improvement to the school and/or its facilities, including its pitches.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>It is acknowledged that there will be sites in the County subject to the SNI zoning objective that may be capable of accommodating other forms of development whilst still protecting existing SNI facilities and the recreational value of such sites. All proposed development on lands zoned SNI will be subject to compliance with the requirements of Section 12.3.2.1 'Development within Sustainable Neighbourhood Infrastructure Lands.' It is not considered appropriate to identify SNI sites or parameters that render a site suitable for development, rather, this will be assessed through the development management process.</p> <p>In formulating this response the Executive have in accordance with section 12 (8) (b) (iii) of the Planning and Development Act, 2000, (as amended) taken account of the strategic direction received from the members at pre-draft stage <i>"To request that the Chief Executive enhance the existing County Development Plan policies in regard to the protection of recreational and community spaces and infrastructure including areas currently with an INST objective"</i>.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>iii) Submission requests that the Council remove the O/O designation from Sea Lodge, Strand Road, Killiney.</p>	<p><b><u>B0913</u></b></p>	<p>The Executive notes the issues raised</p> <p>As already responded to in detail in this report under Section 2.1 'Summary of the Observations, Submissions and <b>Recommendations</b> of the Office of the Planning Regulator', subsection 2.1.7 'Infill and brownfield development', the O/O zone was reviewed while preparing the Draft Plan. This review resulted in a change to the boundary of the O/O zone and revised wording was set out in Policy Objective PHP18: Residential Density. As per the recommendations made by the OPR in their submission no. B1102, the Executive have recommended to omit the 'Notable Character Area Exclusions' section under Policy Objective PHP18 and the corresponding development management section in Chapter 12, Section 12.3.8.8. It is also recommended to omit the O/O zone from maps 4, 7 and 10. A new SLO is proposed.</p> <p><b>Recommendation</b> <b>See detailed recommendation and response set out in Section 2.1 above.</b></p>
<p>iv) Submission requests that the F zone within the ownership of Sea Lodge, Strand Road, Killiney is</p>	<p><b><u>B0913</u></b></p>	<p>The Executive notes the issue raised however disagrees that the area to the east of the garden is rezoned from 'A' to 'F'.</p>

Issues	Sub. No.	Executive’s Response & Recommendation
<p>rezoned to A and that the proposed route of the cycleway through the property is realigned.</p>		<p>The lands in question appears to be located on the eastern / beach side of the boundary wall that encloses the garden of Sea Lodge. The lands are zoned objective ‘F’ – <i>“To preserve and provide for open space with ancillary active recreational amenities”</i> in both the current 2016 plan and the Draft Plan, and this strip of land is located within a proposed Natural Heritage Area (pNHA). The remainder, and majority of the property at Sea Lodge is zoned ‘Objective ‘A’ – <i>“To provide residential development and/or protect and improve residential amenity”</i>.</p> <p>Having regard to the location of the ‘F’ zoned lands proximate to the beach and a pNHA, it is not considered appropriate to rezone these lands.</p> <p>Having regard to details provided by the Property Management section of the Council, the lands located to the south and east of the Sea Lodge and zoned objective ‘F’ appear to have been acquired by DLR by Deed of Dedication in 1986. <b>Notwithstanding this, land use zoning objectives can cross property boundaries as ownership of any site is not a Development Plan matter.</b></p> <p>Map 10 of the Draft Plan shows the proposed route for the ‘East Coast Trail Cycle Route’ traversing the western side of the site. This route is indicative until such time that a detailed design for the route is prepared. It would be remiss of the Council to realign this route until such time as a full feasibility study and all environmental assessments have been carried out, particularly having regard to the ecological sensitivities of the pNHA located to the east.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
<p>v) Requests the re-zoning of lands at Ballycorus from Objective ‘B’ to Objective ‘A’. Alternatively, the submission seeks the designation of the lands as a Strategic Land Reserve.</p>	<p><b><u>B0939</u></b></p>	<p>The Executive does not agree with the submission.</p> <p>The significant quantum of greenfield lands proposed for rezoning are effectively an accretion to already zoned residential lands which form part of the ‘New Residential Community’ at Rathmichael. A Residential Development Capacity Audit was undertaken in order to inform the preparation of the Core Strategy of the Draft Plan and, as indicated in Table 2.8 of Chapter 2, there are approximately 80 hectares of zoned land in the Rathmichael area that may become available for residential development.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>As acknowledged in the Draft Plan, the Rathmichael area is not currently serviced, and the future development of the area is contingent upon the timely delivery of supporting infrastructure. In recognition of these constraints and in order to ensure a plan led approach to development in this area, it is proposed to re-zone the existing zoned residential lands at Rathmichael from Objective 'A' to Objective 'A1' – <i>'To provide for new residential communities and Sustainable Neighbourhood Infrastructure in accordance with approved local area plans.'</i> (see response to the OPR in Section 2.1).</p> <p>As set out in Section 2.4.4 of the Draft Plan, broad equilibrium exists between the supply of zoned land for primarily residential purposes, and the projected demand for new housing. In accordance with the proposed settlement strategy for the County there are already more than sufficient residentially zoned land to cater for forecast demands and targets set by the RSES. It is not considered warranted to zone additional residential land for the 2022-2028 County Development Plan.</p> <p>Finally, the Executive does not recommend the lands be designated a Strategic Land Reserve. As set out in Section 2.3.2 of the Draft Plan the population allocation and housing target for the Core Strategy already incorporates a range of modifiers including population 'headroom' which serves as a means of zoning residential land beyond the six year period of the County Development Plan. It is highlighted that the Strategic Land Reserve identified in the Draft Plan at Old Connaught North pertains to the specific circumstances relating to the allocation of additional population by the EMRA to the Key Town of Bray under NPO 68 of the NPF (see Section 2.4.5).</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
vi) Submission requests the re-zoning of lands at the Ballycorus Road from Objective 'G' to Objective 'A', or alternatively as a least preferred option to Objective 'B'.	<b>B1018</b>	<p>The Executive does not agree with the submission.</p> <p>The lands proposed for rezoning are effectively an accretion to already zoned residential lands which form part of the 'New Residential Community' at Rathmichael. A Residential Development Capacity Audit was undertaken in order to inform the preparation of the Core Strategy of the Draft Plan and, as indicated in Table 2.8 of Chapter 2, there are approximately 80 hectares of zoned land in the Rathmichael area that may become available for residential development.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>As acknowledged in the Draft Plan, the Rathmichael area is not currently serviced, and the future development of the area is contingent upon the timely delivery of supporting infrastructure. In recognition of these constraints and in order to ensure a plan led approach to development in this area, it is proposed to re-zone the existing zoned residential lands at Rathmichael from Objective 'A' to Objective 'A1' – <i>'To provide for new residential communities and Sustainable Neighbourhood Infrastructure in accordance with approved local area plans.'</i> (see response to OPR in Section 2.1).</p> <p>As set out in Section 2.4.4 of the Draft Plan, broad equilibrium exists between the supply of zoned land for primarily residential purposes, and the projected demand for new housing. In accordance with the proposed settlement strategy for the County there are already more than sufficient residentially zoned land to cater for forecast demands and targets set by the RSES. It is not considered warranted to zone additional residential land for the 2022-2028 County Development Plan.</p> <p>It is highlighted that Objective 'G' zoned lands - <i>'To protect and improve high amenity areas'</i> - are the most sensitive and highly protected areas in the County. The selection of lands for high amenity zoning was originally based on, among other factors, their elevation, landscape quality and views and prospects. It is not considered that there is any compelling reason to re-zone these high amenity lands in the Draft Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
vii) Submission requests a rezoning of lands from SNI to residential at a site located at Cherrywood Road, adjoining the hospital lands at St Colmcilles.	B1042	<p>The Executive disagrees with the request to re-zone these lands from 'SNI' to 'A' at this location.</p> <p>The Draft Plan introduces a new land use zoning objective – SNI – “To protect, improve and encourage the provision of sustainable neighbourhood infrastructure”. This new land use zoning, Objective SNI, has been applied to:</p> <ul style="list-style-type: none"> <li>land parcels that contain existing SNI facilities together with its associated amenity / recreational space, e.g. schools, community facilities, places of worship and their associated parish / cultural centres, health care facilities.</li> </ul>

Issues	Sub. No.	Executive’s Response & Recommendation
		<ul style="list-style-type: none"> <li>• lands zoned objective ‘MH’ in the current 2016-2022 plan have also been zoned Objective SNI.</li> <li>• Lands with an extant planning permission for a new SNI facility – as in the case with lands in Ballyogan where a new school has been permitted.</li> </ul> <p>The subject lands are located to the north of St. Colmcille’s Hospital abutting the southern edge of the Loughlinstown River. At present the lands are undeveloped consisting of vegetation. The subject lands sit appropriately 15m below the ground level of the hospital site. Aerial imagery appear to show steps linking the two levels, however, due to heavy vegetation growth, this is currently inaccessible. There is no existing access to the lands from the north along Cherrywood Road.</p> <p>In order to determine which lands and/or facilities are associated with the primary SNI use, boundaries used in planning histories have been reviewed and have been used in the application of the SNI zoning objective.</p> <p>Having reviewed planning history for the lands, it is apparent that the lands originally formed part of the hospital campus as it was included within site boundaries for development at the hospital as recently as 2012 under Reg. Ref. D12A/0147. Subsequent hospital related planning applications have not included the subject lands.</p> <p>The lands are currently zoned ‘MH’ – ‘To improve, encourage and facilitate the provision and expansion of medical-hospital uses and services’ and are subject to the ‘INST’ objective.</p> <p>No development has granted permission within the subject lands to date. Any development permitted to date within a site that includes the subject lands are hospital / medical related uses.</p> <p>Having regard to the current ‘MH’ land use zoning and that no permission has been granted within the lands for uses other than that associated with the hospital / medical uses, it is considered that this land parcel should remain zoned ‘SNI’.</p> <p>The ownership and/or sale of lands is not a County Development Plan matter.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>As set out in Table 13.1.7 (pg. 306), Chapter 13 of the Draft Plan, a number of uses are both permitted in principle and open for consideration under the land use zoning Objective SNI. It is noted that uses permitted in principle and open for consideration within the SNI land use zone are generally in line with those listed within the land use zoning table for lands zoned 'MH' in the current plan.</p> <p>It is acknowledged that there will be sites in the County subject to the SNI zoning objective that may be capable of accommodating other forms of development whilst still protecting existing SNI facilities and the recreational value of such sites. All proposed development on lands zoned SNI will be subject to compliance with the requirements of Section 12.3.2.1 'Development within Sustainable Neighbourhood Infrastructure Lands.' It is not considered appropriate to identify SNI sites or parameters that render a site suitable for development, rather, this will be assessed through the development management process.</p> <p>In formulating this response the Executive have in accordance with section 12 (8) (b) (iii) of the Planning and Development Act, 2000, (as amended) taken account of the strategic direction received from the members at pre-draft stage "To request that the Chief Executive enhance the existing County Development Plan policies in regard to the protection of recreational and community spaces and infrastructure including areas currently with an INST objective".</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
viii) Request that the background map for Cherrywood as shown on map 10 be updated with OS map or map 2,1 of the Planning Scheme.	<b><u>B1067</u></b>	<p>The Executive notes the issue raised and would concur that the base mapping for the Cherrywood area needs to be updated to include the most recent OS data.</p> <p><b>Recommendation</b> Update background map for Cherrywood so that both amendments are shown and up to date OS base map information is used.</p>
ix) Request rezoning from SNI to F of an area to the north of Loughlinstown Hospital.	<b><u>B1169</u></b>	<p>The Executive disagrees with the request to re-zone these lands from 'SNI' to 'F' at this location.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>The Draft Plan introduces a new land use zoning objective – SNI – “To protect, improve and encourage the provision of sustainable neighbourhood infrastructure”. This new land use zoning, Objective SNI, has been applied to:</p> <ul style="list-style-type: none"> <li>• Land parcels that contain existing SNI facilities together with its associated amenity / recreational space, e.g. schools, community facilities, places of worship and their associated parish / cultural centres, health care facilities.</li> <li>• Lands zoned objective ‘MH’ in the current 2016-2022 plan have also been zoned Objective SNI.</li> <li>• Lands with an extant planning permission for a new SNI facility – as in the case with lands in Ballyogan where a new school has been permitted.</li> </ul> <p>The subject lands are located to the south west of St. Colmcille's Hospital abutting the proposed Luas line. At present the lands are in recreational use as a pitch.</p> <p>In order to determine which lands and/or facilities are associated with the primary SNI use, boundaries used in planning histories have been reviewed and have been used in the application of the SNI zoning objective.</p> <p>Having reviewed planning history for the lands, it is apparent that the lands originally formed part of the hospital campus as it was included within site boundaries for development at the hospital as recently as 2012 under Reg. Ref. D12A/0147. Subsequent hospital related planning applications in 2016 and 2017 have not included the subject lands.</p> <p>The lands are currently zoned ‘MH’ – ‘To improve, encourage and facilitate the provision and expansion of medical-hospital uses and services’ and are subject to the ‘INST’ objective.</p> <p>While it is acknowledged that the pitch is used by sports clubs, it is also used for amenity purposes by the hospital. Having regard to the fact that the proposed SNI covers recreational uses associated with the SNI use, it is considered that this land parcel should remain zoned ‘SNI’.</p> <p>In formulating this response the Executive have in accordance with section 12 (8) (b) (iii) of the Planning and Development Act, 2000, (as amended) taken account of the strategic</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>direction received from the members at pre-draft stage <i>"To request that the Chief Executive enhance the existing County Development Plan policies in regard to the protection of recreational and community spaces and infrastructure including areas currently with an INST objective"</i>.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.31.10: Map 13</b>		
<p>i) Requests the re-zoning of c. 22ha of land located to the south of Kiltiernan from Objective 'G' to Objective 'A' and the inclusion of a key site requirement under the land use zoning matrix to enable the provision of nursing homes/healthcare facilities.</p>	<p><b>B0104</b></p>	<p>The Executive does not agree with the submission.</p> <p>The greenfield lands proposed for rezoning are located in an area wholly zoned Objective 'G', to the south of the identified 'New Residential Community' at Kiltiernan-Glenamuck. A Residential Development Capacity Audit was undertaken in order to inform the preparation of the Core Strategy of the Draft Plan and, as indicated in Table 2.8 of Chapter 2, there are approximately 60 hectares of zoned land in the Kiltiernan-Glenamuck Local Area Plan area, which are, or may become available, for residential development. The majority of the Kiltiernan-Glenamuck LAP lands are currently undeveloped.</p> <p>Objective 'G' zoned lands - 'To protect and improve high amenity areas' - are the most sensitive and highly protected areas in the County. The selection of lands for high amenity zoning was originally based on, among other factors, their elevation, landscape quality and views and prospects. It is not considered that there is any compelling reason to re-zone these high amenity lands in the Draft Plan.</p> <p>As set out in Section 2.4.4 of the Draft Plan, broad equilibrium exists between the supply of zoned land for primarily residential purposes, and the projected demand for new housing. In accordance with the proposed settlement strategy for the County there are already more than sufficient residentially zoned land to cater for forecast demands and targets set by the RSES. It is not considered warranted to zone additional residential land for the 2022-2028 County Development Plan.</p> <p>Having regard to the location and accessibility of the lands which, although located adjoining the LAP lands, are at a remove from the main urban area, the Executive does not support the inclusion of an objective to enable the provision of a nursing home/healthcare facility. As set</p>

Issues	Sub. No.	Executive’s Response & Recommendation
		<p>out in Section 4.3.2.5 of the Draft Plan it is Council policy that proposals for accommodation for older people should be located in existing residential areas well served by social and community infrastructure and amenities such as footpath networks, local shops and public transport in order not to isolate residents and allow for better care in the community, independence and access. Furthermore, it is considered that the provision of a healthcare facility at the lands would be inconsistent with Policy Objective PHP9: Health Care Facilities which provides that it is a Policy Objective to encourage the integration of appropriate healthcare facilities within new and existing communities.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Requests the re-zoning of c. 22ha of land from Objective ‘G’ to Objective ‘E’ and the inclusion of locational policies and zoning objectives under the land use zoning matrix to enable provision for tourism, mixed use recreational facilities and associated residential.</p>	<p><b>B0104</b></p>	<p>The Executive notes the issue raised</p> <p>It is highlighted from the outset that the subject lands are zoned Objective ‘G’ - ‘To protect and improve high amenity areas’ - which are the most sensitive and highly protected areas in the County. The selection of lands for high amenity zoning was originally based on, among other factors, their elevation, landscape quality and views and prospects.</p> <p>The Employment Strategy, set out in Section 2.4.8.5 of the Draft Plan, promotes the intensification and redevelopment of existing strategic employment areas within the M50 ring and the activation of key strategic sites such as Cherrywood and Carrickmines which are accessible to public transport. It is considered that the re-zoning of high amenity lands in a peripheral location would be inconsistent with overarching Employment Strategy for the County. Furthermore, as considered in Section 2.4.8.4 of the Draft Plan there are already sufficient employment lands zoned to provide for the projected additional workforce resident in DLR for the Plan period and beyond. It is not considered that there is any compelling reason to re-zone these high amenity lands Objective ‘E’.</p> <p>The Local Authority acknowledges and supports the latent potential for tourism and recreational activities at the lands in association with the existing hotel complex and sports facility, ski slope, walking trails and equestrian centre. Having regard to the high amenity zoning of the wider lands it is considered that tourism related activities should adopt a consolidatory approach which focusses on the utilisation of the existing built environment. The Local Authority supports a sustainable and plan-led approach to tourism at this location</p>

Issues	Sub. No.	Executive’s Response & Recommendation
		<p>which, in recognition of the Objective ‘G’ High Amenity zoning of the lands, places the existing hotel complex and sports facility as the primary focus in delivering the tourism product. This approach would be consistent with the overarching strategic outcome of the Draft Plan for the creation of a climate resilient County through the sustainable management of our environmental resources.</p> <p>The Executive considers the provisions of the Draft Plan already provide the appropriate planning framework to support a sustainable approach to tourism at this location whereby land uses including, for example, ‘Hotel/Motel’ (in existing premises) and sports facilities are identified as ‘Open for Consideration’ in Objective ‘G’ zoned lands.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Requests the ‘G’ zoning pertaining to an area of c. 46ha is maintained but seeks the inclusion of locational policies and zoning objectives under the land use zoning matrix to enable provision for: equestrian facilities as well as associated accommodation for employees and jockeys; and, tourism facilities associated with the adjacent hotel complex.</p>	<p><b>B0104</b></p>	<p>The Executive notes the issue raised.</p> <p>There are no proposals to rezone the subject lands zoned Objective ‘G’ – <i>‘To protect and improve high amenity areas’</i> in the Draft Plan (and Chief Executive’s Report).</p> <p>It is highlighted that ‘Agricultural Buildings’ are considered ‘Open for Consideration’ under zoning Objective ‘G’. In addition, Policy Objective E20: Equine Industry of the Draft Plan provides overarching support for the equine industry:</p> <p><i>‘It is a Policy Objective to support the Government commitment to the horse industry in Ireland and to promote and support and facilitate the development of the equine industry in Dún Laoghaire-Rathdown County in particular and to promote Dún Laoghaire-Rathdown as a centre of excellence for the bloodstock industry.’</i></p> <p>Furthermore, the provision of on-site residential accommodation in association with the development of horse breeding or equine facilities is specifically acknowledged under Policy Objective E20 - see Section 6.4.2.19 of the Draft Plan. The Executive considers the provisions of the Draft Plan already provide the appropriate planning framework for proposals relating to equine facilities to be assessed through the development management process.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>As set out above the land use 'Hotel/Motel' (in existing premises) is identified as 'Open for Consideration' in Objective 'GB' zoned lands.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Requests the re-zoning of lands adjacent to the Scalp Wood Nurseries from Objective 'G' to Objective 'B'.</p>	<p><b><u>B0264</u></b></p>	<p>The Executive does not agree with the submission.</p> <p>It is noted from the outset that Objective 'G' zoned lands - '<i>To protect and improve high amenity areas</i>' - are the most sensitive and highly protected areas in the County. The selection of lands for high amenity zoning was originally based on, among other factors, their elevation, landscape quality and views and prospects.</p> <p>The landowner seeks the change in zoning from Objective 'G' to Objective 'B' to facilitate agriculture / horticulture activity. It is highlighted that the existing Objective 'G' (High Amenity) zone has a wide range of agricultural/horticultural uses 'Open for Consideration' including, for example, inter alia: Allotments; Agricultural Buildings; Garden Centre/Plant Nursery; Rural Industry-Cottage; and, Rural Industry-Food.</p> <p>Having regard to the proposed use of the lands for agriculture/horticulture activity and the range and variety of uses 'Open for Consideration' at Objective 'G' zoned lands, the Executive does not consider that adequate justification has been put forward to support the re-zoning of Objective 'G' High Amenity lands.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>v) Submissions do not support any rezoning of lands at or adjoining the sports hotel and disagrees with the case put forward in submission B0104.</p>	<p><b><u>B0544</u></b> <b><u>B0578</u></b> <b><u>B0703</u></b> <b><u>B0964</u></b></p>	<p>The Executive notes the issues raised.</p> <p>The Draft Plan does not propose any change to the zoning of these lands and neither does the Chief Executive's report.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>vi) Requests the high amenity zoning attached to the high ground to the west of the Enniskerry Road,</p>	<p><b><u>B0544</u></b></p>	<p>The Executive notes the issue raised.</p>

Issues	Sub. No.	Executive's Response & Recommendation
along Killegar Road and in Glencullen be maintained.		<p>It is not intended to rezone lands zoned Objective 'G' – 'To protect and improve high amenity areas' on high ground to the west of the Enniskerry Road, along Killegar Road and in Glencullen.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
vii) Requests the re-zoning of c. 18.4 ha of land located to the south of Kiltiernan from Objective 'G' to Objective 'A'.	<b>B0815</b>	<p>The Executive does not agree with the issue raised.</p> <p>The greenfield lands proposed for rezoning are located in an area wholly zoned Objective 'G', at a remove from the nearest identified 'New Residential Community' at Kiltiernan-Glenamuck. A Residential Development Capacity Audit was undertaken in order to inform the preparation of the Core Strategy of the Draft Plan and, as indicated in Table 2.8 of Chapter 2, there are approximately 60 hectares of zoned land in the Kiltiernan-Glenamuck Local Area Plan area, which are, or may become available, for residential development. The majority of the Kiltiernan-Glenamuck LAP lands are currently undeveloped.</p> <p>Objective 'G' zoned lands - 'To protect and improve high amenity areas' - are the most sensitive and highly protected areas in the County. The selection of lands for high amenity zoning was originally based on, among other factors, their elevation, landscape quality and views and prospects. It is not considered that there is any compelling reason to re-zone these high amenity lands in the Draft Plan.</p> <p>As set out in Section 2.4.4 of the Draft Plan, broad equilibrium exists between the supply of zoned land for primarily residential purposes, and the projected demand for new housing. In accordance with the proposed settlement strategy for the County there are already more than sufficient residentially zoned land to cater for forecast demands and targets set by the RSES. It is not considered warranted to zone additional residential land for the 2022-2028 County Development Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.31.111: Map 14</b>		
i) Requests the re-zoning of lands in Rathmichael from Objective 'G' to Objective 'A'.	<b>B0126</b>	The Executive does not agree with the submission.

Issues	Sub. No.	Executive's Response & Recommendation
		<p>The greenfield lands proposed for rezoning are effectively an accretion to already zoned residential lands which form part of the 'New Residential Community' at Rathmichael. A Residential Development Capacity Audit was undertaken in order to inform the preparation of the Core Strategy of the Draft Plan and, as indicated in Table 2.8 of Chapter 2, there are approximately 80 hectares of zoned land in the Rathmichael area that may become available for residential development.</p> <p>As acknowledged in the Draft Plan, the Rathmichael area is not currently serviced, and the future development of the area is contingent upon the timely delivery of supporting infrastructure. In recognition of these constraints and in order to ensure a plan led approach to development in this area, it is proposed to re-zone the existing zoned residential lands at Rathmichael from Objective 'A' to Objective 'A1' – <i>'To provide for new residential communities and Sustainable Neighbourhood Infrastructure in accordance with approved local area plans.'</i> (see response to OPR in Section 2.1).</p> <p>As set out in Section 2.4.4 of the Draft Plan, broad equilibrium exists between the supply of zoned land for primarily residential purposes, and the projected demand for new housing. In accordance with the proposed settlement strategy for the County there are already more than sufficient residentially zoned land to cater for forecast demands and targets set by the RSES. It is not considered warranted to zone additional residential land for the 2022-2028 County Development Plan.</p> <p>Finally, it is highlighted that Objective 'G' zoned lands - <i>'To protect and improve high amenity areas'</i> - are the most sensitive and highly protected areas in the County. The selection of lands for high amenity zoning was originally based on, among other factors, their elevation, landscape quality and views and prospects. It is not considered that there is any compelling reason to re-zone high amenity lands in the Draft Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
ii) Submission requests that an existing residential property located at Dublin Road, Bray is rezoned from Objective 'E' to Objective 'A'.	<b><u>B0225</u></b>	<p>The Executive does not agree with the issue raised.</p> <p>The relatively large single dwelling property is adjoined to the north by an undeveloped parcel of similarly zoned Objective 'E' lands – an area identified in Section 2.4.8.3 of the Draft</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>Plan with potential for future employment use. It is noted that the zoning of the subject site Objective 'E' does not affect the continued use of the property as a residential dwelling.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) Requests the inclusion of a boundary for the Rathmichael LAP area. Makes the case for the inclusion of a boundary in line with that identified in the 2010-2016 County Development Plan, with minor changes at the southern end adjoining the proposed boundary for the Old Connaught LAP.</p>	<p><b><u>B0260</u></b></p>	<p>The Executive notes the issue raised.</p> <p>In order to ensure a plan led approach to development at Rathmichael, it is proposed to re-zone the existing zoned residential lands from Objective 'A' to Objective 'A1' – <i>'To provide for new residential communities and Sustainable Neighbourhood Infrastructure in accordance with approved local area plans.'</i> (see response to OPR in Section 2.1).</p> <p>The Executive agrees with the request to incorporate a boundary for the Rathmichael LAP area and this is proposed in response to the submission from the OPR in Section 2.1. In terms of the specific boundary recommended in the subject submission, it is highlighted that the boundary proposed is indicative only and will be reviewed as part of the Local Area Plan plan-making process for the area.</p> <p><b>Recommendation</b> <i>See recommended amendments in Section 2.1.</i></p>
<p>iv) Submission requests that land between Crinken Lane and Wilford are rezoned from GB to A and SNI.</p>	<p><b><u>B0261</u></b></p>	<p>The Executive notes the issue raised.</p> <p>As part of the plan-making process for the County Development Plan a Residential Development Capacity Audit was undertaken in Q4 2019 (see Section 2.3.7 of the Draft Plan) and a potential residential yield of c. 2,000 homes was identified at Woodbrook-Shanganagh. While construction activity at Woodbrook-Shanganagh is anticipated in the short term it is highlighted that the full residential yield of the area remains to be delivered.</p> <p>Furthermore, it is highlighted that the 'New Residential Community' at Old Connaught comprises a further 50 hectares of undeveloped 'A1' zoned land. Old Connaught is designated under the Dublin MASP as suitable for the development of a new residential community under the North-South Corridor (DART) with a delivery timeframe of the short to medium term. There is a significant quantum of undeveloped zoned land at the south of the County.</p>

Issues	Sub. No.	Executive’s Response & Recommendation
		<p>As set out in Section 2.4.4 of the Draft Plan, broad equilibrium exists between the supply of zoned land for primarily residential purposes, and the projected demand for new housing. In accordance with the proposed settlement strategy for the County there are already more than sufficient residentially zoned land to cater for forecast demands and targets set by the RSES. It is not considered warranted to zone additional residential land for the 2022-2028 County Development Plan.</p> <p>The Draft Plan introduces a new land use zoning objective – SNI – <i>“To protect, improve and encourage the provision of sustainable neighbourhood infrastructure”</i>. This new land use zoning, Objective SNI, has been applied to:</p> <ul style="list-style-type: none"> <li>• Land parcels that contain existing SNI facilities together with its associated amenity / recreational space, e.g. schools, community facilities, places of worship and their associated parish / cultural centres, health care facilities.</li> <li>• Lands zoned objective ‘MH’ in the current 2016-2022 plan have also been zoned Objective SNI.</li> <li>• Lands with an extant planning permission for a new SNI facility – as in the case with lands in Ballyogan where a new school has been permitted.</li> </ul> <p>In addition to the land use zoning objective, specific local objectives (SLO) have been applied to existing SNI facilities located on sites within either existing mixed use zoning objectives in town centre locations e.g. Major Town Centres (MTC) where a range of uses are already permitted in principle, and on land use zoning objectives where there are more restrictive objectives and greater protection of existing facilities, e.g. on as lands zoned ‘GB’ as with the case at Woodbrook College.</p> <p>In this regard, SLO 22 has been applied to the lands associated with Woodbrook College. SLO 22 is outlined on Map 14 at this location and has an objective: <i>“To retain, improve and encourage the provision of sustainable neighbourhood infrastructure facilities within the outlined group of building / land.”</i></p> <p>It is not intended to change the underlying land use zoning from GB at this location. It is therefore not considered necessary to rezoned the lands to SNI at Woodbrook College.</p>

Issues	Sub. No.	Executive’s Response & Recommendation
		<p><b>Recommendation</b> No change to Draft Plan.</p>
<p>v) Submission requests the rezoning of the Windsor Motors, Bray, from E to A2 “to provide for the creation of sustainable residential neighbourhoods and preserve and protect residential amenity”.</p> <p>vi) The submission notes a change in the land use zoning map with regard to the bus corridor and a ‘dezoning’ to the front of the site to facilitate same.</p>	<p><b><u>B0321</u></b></p>	<p>The Executive notes the issues raised.</p> <p>As per Table 13.1.1 ‘Development Plan Zoning Objectives’ in Chapter 13 of the Draft Plan, zoning objective ‘A2’ – “to provide for the creation of sustainable residential neighbourhoods and preserve and protect residential amenity” is a land use zoning specific to the Sandyford Urban Framework Plan Area. This land use zoning objective is not applied elsewhere within the County.</p> <p>Section 2.4.8.4 of the Draft Plan provides an evidence-based analysis to estimate the requirement for employment zoned lands in the County. The analysis found that while there was a sufficient quantum of employment zoned lands available to facilitate continued economic development and employment growth in the County over the Plan period, that the extent of the employment landbank in DLR was quite low in comparison to adjoining Counties in the MASP area and as such, there is an enhanced need to retain and protect these lands for employment purposes. The Executive supports the retention and protection of the subject lands for continued employment use.</p> <p>With regard to the issue of ‘dezoning’ or a white area to the front of the site along the Dublin Road, this is a mapping anomaly that has occurred subsequent to removal of a roads objective that is shown on Map 14 of the current 2016 County Development Plan. The removal of this roads objective has resulted in no zoning being provided to the west of land parcels located on the eastern side of the Dublin Road from Wilford Roundabout to the County boundary with Wicklow County Council. It is therefore considered appropriate to extend the zoning objective of the land parcel immediately to the east into this white or unzoned space along the Dublin Road.</p> <p><b>Recommendation</b> Amend Map 14 to extend the land use zoning of land parcels on the eastern side of the Dublin Road into unzoned / white areas located immediately to the west of each land parcel.</p>

Issues	Sub. No.	Executive's Response & Recommendation
vii) Requests the rezoning of c. 5ha of land at 'Analands', Ferndale Road from Objective 'GB' - Green Belt to Objective 'A' – Residential.	<b><u>B0595</u></b> <b><u>B1263</u></b>	<p>The Executive does not agree with the submission.</p> <p>The greenfield lands proposed for rezoning are effectively an accretion to already zoned residential lands which form part of the 'New Residential Community' at Rathmichael. A Residential Development Capacity Audit was undertaken in order to inform the preparation of the Core Strategy of the Draft Plan and, as indicated in Table 2.8 of Chapter 2, there are approximately 80 hectares of zoned land in the Rathmichael area that may become available for residential development. Furthermore, the Old Connaught lands to the south comprise a further 50 hectares of 'A1' zoned land.</p> <p>As set out in Section 2.4.4 of the Draft Plan, broad equilibrium exists between the supply of zoned land for primarily residential purposes, and the projected demand for new housing. In accordance with the proposed settlement strategy for the County there are already more than sufficient residentially zoned land to cater for forecast demands and targets set by the RSES. It is not considered warranted to zone additional residential land for the 2022-2028 County Development Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
viii) Requests that lands to the north of Old Connaught, designated in the Draft Plan as a Strategic Land Reserve, are re-zoned from Objective 'GB' to Objective 'A1'.	<b><u>B0928</u></b>	<p>The Executive does not agree with the submission.</p> <p>The Strategic Land Reserve identified in the Draft Plan at Old Connaught North pertains to the specific circumstances relating to the allocation of additional population by the EMRA to the Key Town of Bray under NPO 68 of the NPF (see Section 2.4.5). An additional 3,500 population was allocated to DLR under the 2031 'High' population target scenario of the RSES and the Strategic Land Reserve represents the population growth which falls outside of the Plan period. The identification of the subject lands as a Strategy Land Reserve is consistent with the RSES.</p> <p>As noted, there are approximately 80 hectares of zoned land in the Rathmichael area that may become available for residential development and furthermore the Old Connaught lands comprise a further 50 hectares of 'A1' zoned land. There are already more than sufficient residentially zoned land to cater for forecast demands and targets set by the RSES. It is not</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>considered warranted to zone additional residential land for the 2022-2028 County Development Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ix) Request the inclusion of a site known as Analands on the Ferndale Road within the boundary of the Rathmichael Local Area Plan.</p>	<p><b><u>B1263</u></b></p>	<p>The Executive notes the issue raised.</p> <p>In order to ensure a plan led approach to development at Rathmichael, it is proposed to re-zone the existing zoned residential lands from Objective 'A' to Objective 'A1' – <i>'To provide for new residential communities and Sustainable Neighbourhood Infrastructure in accordance with approved local area plans.'</i> (see response to OPR in Section 2.1).</p> <p>As set out in response to the submission from the OPR in Section 2.1 it is proposed that an indicative boundary for the Rathmichael LAP area is included on Land Use Maps 10 and 14. It is noted that the subject lands known as Analands are included within the indicative boundary. It is highlighted that the boundary proposed is indicative only and will be reviewed as part of the Local Area Plan plan-making process for the area.</p> <p><b>Recommendation</b> See recommended amendments in Section 2.1.</p>
<p>x) Requests rezoning of lands from Objective 'GB'-Greenbelt to Objective 'A' at the following locations:</p> <ul style="list-style-type: none"> <li>● Site immediately east of Woodbrook Downs, Dublin Road.</li> <li>● Site at Wilford House, Dublin Road.</li> </ul>	<p><b><u>B1262</u></b></p>	<p>The Executive does not agree with the submission.</p> <p>As part of the plan-making process for the County Development Plan a Residential Development Capacity Audit was undertaken in Q4 2019 (see Section 2.3.7 of the Draft Plan) and a potential residential yield of c. 2,000 homes was identified at Woodbrook-Shanganagh. While construction activity at Woodbrook-Shanganagh is anticipated in the short term it is highlighted that the full residential yield of the area remains to be delivered.</p> <p>Furthermore, it is highlighted that the 'New Residential Community' at Old Connaught comprises a further 50 hectares of undeveloped 'A1' zoned land. Old Connaught is designated under the Dublin MASP as suitable for the development of a new residential community under the North-South Corridor (DART) with a delivery timeframe of the short to medium term. There is a significant quantum of undeveloped zoned land at the south of the County.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>As set out in Section 2.4.4 of the Draft Plan, broad equilibrium exists between the supply of zoned land for primarily residential purposes, and the projected demand for new housing. In accordance with the proposed settlement strategy for the County there are already more than sufficient residentially zoned land to cater for forecast demands and targets set by the RSES. It is not considered warranted to zone additional residential land for the 2022-2028 County Development Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xi) Requests the Strategic Land Reserve be amended to include the lands to the north of the SLR which are within the boundary of the Old Connaught LAP</p>	<p><b><u>B1261</u></b></p>	<p>The Executive does not agree with the submission.</p> <p>The Strategic Land Reserve identified in the Draft Plan at Old Connaught North pertains to the specific circumstances relating to the allocation of additional population by the EMRA to the Key Town of Bray under NPO 68 of the NPF (see Section 2.4.5 of the Draft Plan). There is no requirement to identify additional lands as a Strategic Land Reserve.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xii) Submission refers to the Aske and Christian Brothers land at Shankill and states that it had been their understanding it was reserved for recreational and sporting activities. Notes that there is now is a change of use from Green Belt to Objective MOC.</p> <p>Submission requests that the lands at the Aske and Christian Brothers', are reserved for playing pitches and other sporting and recreational facilities and not changed from Green Belt to Objective MOC.</p>	<p><b><u>B0669</u></b> <b><u>B0702</u></b></p>	<p>The Executive notes the issue raised.</p> <p>The lands at the Aske and the Christian Brothers lands, which it is assumed relates to lands associated with Woodbrook College, are zoned objective 'GB' - <i>"To protect and enhance the open nature of lands between urban areas"</i> on Map 14 of the Draft Plan.</p> <p>A specific local objective, SLO 22 has been applied to the lands at Woodbrook College stating: <i>"To retain, improve and encourage the provision of sustainable neighbourhood infrastructure facilities within the outlined group of buildings / land."</i></p> <p>There is no proposal to change the land use zoning objective at this location.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>xiii) Requests the re-zoning of lands at Dublin Road, Shankill from Objective 'GB' to Objective 'A1'. Contends there are insufficient lands zoned 'A1' within the Woodbrook-Shanganagh LAP area to meet the objective of providing 2000-2300 units, as set out in the LAP.</p>	<p><b>B0849</b></p>	<p>The Executive does not agree with the submission.</p> <p>As part of the plan-making process for the County Development Plan a Residential Development Capacity Audit was undertaken in Q4 2019 (see Section 2.3.7 of the Draft Plan) and a potential residential yield of c. 2,000 homes was identified for Woodbrook-Shanganagh, representing the two key sites at Shanganagh Castle and Woodbrook. The Executive does not agree with the contention that there are insufficient 'A1' zoned lands at Woodbrook-Shanganagh.</p> <p>While construction activity at Woodbrook-Shanganagh is anticipated in the short term it is highlighted that the full residential yield of the area remains to be delivered.</p> <p>As set out in Section 2.4.4 of the Draft Plan, broad equilibrium exists between the supply of zoned land for primarily residential purposes, and the projected demand for new housing. In accordance with the proposed settlement strategy for the County there are already more than sufficient residentially zoned land to cater for forecast demands and targets set by the RSES. It is not considered warranted to zone additional residential land for the 2022-2028 County Development Plan.</p> <p>Finally, it is noted that areas of both Flood Zone A and Flood Zone B are located at the west and south of the lands – see Flood Map 14 of the Strategic Flood Risk Assessment.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xiv) Requests that c. 7 hectares of land to the west of Woodbrook College, Dublin Road are re-zoned from Objective 'GB' to Objective 'A'.</p> <p>If the Council do not consider a residential zoning objective to be possible it is requested that the landholding be designated a Strategic Land Reserve.</p>	<p><b>B0928</b></p>	<p>The Executive does not agree with the submission.</p> <p>While the subject lands are zoned 'GB', it is noted that a significant portion of the land is subject to Specific Local Objective 22 in the Draft Plan, as follows:</p> <p><i>'To retain, improve and encourage the provision of sustainable neighbourhood infrastructure facilities within the outlined group of buildings / land.'</i></p> <p>As part of the plan-making process for the County Development Plan a Residential Development Capacity Audit was undertaken in Q4 2019 (see Section 2.3.7 of the Draft Plan)</p>

Issues	Sub. No.	Executive’s Response & Recommendation
		<p>and a potential residential yield of c. 2,000 homes was identified at Woodbrook-Shanganagh. While construction activity at Woodbrook-Shanganagh is anticipated in the short term it is highlighted that the full residential yield of the area remains to be delivered. Furthermore, it is highlighted that the ‘New Residential Community’ at Old Connaught comprises a further 50 hectares of undeveloped ‘A1’ zoned land. Old Connaught is designated under the Dublin MASP as suitable for the development of a new residential community.</p> <p>As set out in Section 2.4.4 of the Draft Plan, broad equilibrium exists between the supply of zoned land for primarily residential purposes, and the projected demand for new housing. In accordance with the proposed settlement strategy for the County there are already more than sufficient residentially zoned land to cater for forecast demands and targets set by the RSES. It is not considered warranted to zone additional residential land for the 2022-2028 County Development Plan.</p> <p>The Executive does not recommend the lands be designated a Strategic Land Reserve. As set out in Section 2.3.2 of the Draft Plan the population allocation and housing target for the Core Strategy already incorporates a range of modifiers including population ‘headroom’ which serves as a means of zoning residential land beyond the six year period of the County Development Plan. It is highlighted that the Strategic Land Reserve identified in the Draft Plan at Old Connaught North pertains to the specific circumstances relating to the allocation of additional population by the EMRA to the Key Town of Bray under NPO 68 of the NPF (see Section 2.4.5).</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xv) Welcomes the designation of the Strategic Land Reserve to the west of M11 but considers the lands should be rezoned for residential development.</p> <p>Highlights that failure to zone the lands residential means they cannot be taken into consideration by other agencies and infrastructure providers such as</p>	<p><b><u>B0967</u></b></p>	<p>The Executive does not agree with the submission.</p> <p>The Strategic Land Reserve identified in the Draft Plan at Old Connaught North pertains to the specific circumstances relating to the allocation of additional population by the EMRA to the Key Town of Bray under NPO 68 of the NPF (see Section 2.4.5). An additional 3,500 population was allocated to DLR under the 2031 ‘High’ population target scenario of the RSES and the Strategic Land Reserve represents the population growth which falls outside of the Plan period. The identification of the subject lands as a Strategic Land Reserve is consistent with the RSES and the Local Authority does not recommend any change to this designation.</p>

Issues	Sub. No.	Executive's Response & Recommendation
Irish Water, TII and the NTA in their capital planning programmes.		<p>As noted, there are approximately 80 hectares of zoned land in the Rathmichael area that may become available for residential development and furthermore the Old Connaught lands comprise a further 50 hectares of 'A1' zoned land. There are already more than sufficient residentially zoned land to cater for forecast demands and targets set by the RSES. It is not considered warranted to zone additional residential land for the 2022-2028 County Development Plan.</p> <p>In terms of infrastructure provision, the Draft Plan is accompanied by an Infrastructure Assessment (Appendix 1) which details the strategic infrastructural projects required to be delivered to enable residential development at zoned residential land (Tier 2). As noted in Section 2.4.5 of the Draft Plan, the lands designated Strategic Land Reserve are not zoned for residential development and as such are not included in the Infrastructure Assessment. Notwithstanding, it is noted that the indicative Local Area Plan boundary for Old Connaught has been expanded under the Draft Plan to incorporate the full extent of the Strategic Land Reserve and furthermore, Section 2.4.5 of the Draft Plan provides that, '<i>Regard shall be had to this reserve in the future Old Connaught Local Area Plan.</i>'</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
xvi) Submission highlights an anomalous / irregular area of 'F' zoned lands at the former Bray Golf Club lands and requests an amendment to the land use zoning alignment from Objective 'F' to Objective 'A'.	<b><u>B0977</u></b>	<p>The Executive notes the issue raised.</p> <p>The former Bray Golf Course lands are identified in the RSES to support the continued development of Bray (RPO 4.37). The delineation of the Objective 'F' zoning at the north of the former Bray Golf Club lands would appear to be based on a planning permission for a residential scheme granted in 2010 (DLR Reg. Ref. D07A/1495 / ABP Ref. PL06D.230215). The permission was not implemented, and the lands remain undeveloped.</p> <p>It is acknowledged that the current delineation of the Objective 'F' zoned lands is irregular in shape. The Executive considers that the relatively minor amendment to the delineation of existing Objective 'F' zoning requested in the submission would allow greater flexibility in the overall design approach for both future residential development and open space at the former Bray Golf Club lands. An amendment to the Objective 'F' zoned land is recommended on this basis.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>As provided under Policy Objective OSR7: Trees, Woodland and Forestry, the Council will seek to preserve trees, groups of trees and/or woodlands that form significant features in the landscape, and/or are important in setting the character, amenity, or ecology of an area. Furthermore Section 12.8.11 of the Draft Plan provides that new developments shall be designed to incorporate, as far as practicable, the amenities offered by existing trees and hedgerows. In this context, the Executive recommends that the objective 'To protect and preserve Trees and Woodlands' is applied to the existing copse of trees located at the north west of the subject lands.</p> <p><b>Recommendation</b> Amend Map 14 to change lands identified in the Draft Plan as Objective 'F' (as shown in the submission received) to Objective 'A'.</p> <p>Amend Map 14 to include the following objective at the north west of the former Bray Golf Club lands: <i>'To protect and preserve Trees and Woodlands'</i></p>
xvii) Submission requests the re-zoning of lands located between Connawood Drive and Connawood Grove from Objective 'F' to Objective 'A'.	<b><u>B1069</u></b>	<p>The Executive does not agree with the submission.</p> <p>The subject site was shown and approved as public open space as part of the overall residential development granted under DLR Ref. 92A/0938 and DLR Ref. D94A/0299. The proposed re-zoning request would materially contravene these permissions.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

**3.32: Miscellaneous**

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<b>3.32.1: General Issues</b>			
i) Submission considers that new residential developments are unsympathetic to the established harmony of the area (Mount Merrion).	<b><u>B0008</u></b>	2	<p>The Executive notes the issues raised.</p> <p>Section 12.3.1.1 Design Criteria lists criteria that will be considered when assessing applications. These include context – having regard to the setting of the site, the surrounding character, streetscape, and the impact of any proposed development on the development potential of adjoining sites.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
ii) Submissions express concerns with the current Strategic Housing Development process, legislation and associated decisions made by An Bord Pleanála.	<b><u>B0047</u></b> <b><u>B0079</u></b> <b><u>B0137</u></b> <b><u>B0139</u></b> <b><u>B0538</u></b> <b><u>B1056</u></b> <b><u>B1126</u></b> <b><u>B1191</u></b> <b><u>B1202</u></b>		<p>The Executive notes the discontent expressed by a number of submitters in relation the SHD process. While the various submitter's points have been noted on this matter, the Council do not have a role in the drafting of legislation. <b>As such, this is not a County Development Plan matter.</b></p> <p>The SHD process was established under the Planning and Development (Housing) and Residential Tenancies Act 2016 and the Planning and Development (Strategic Housing Development) Regulations 2017. The process enables applications which consist of over 100 housing units or over 200 bed spaces in the case of student accommodation. The planning authority makes a submission on the application, which contains a recommendation as to whether the application should be granted planning permission, but the ultimate decision lies with An Bord Pleanála.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
iii) Taxes imposed on institutional lands have resulted in loss of green fields and walled gardens across the County	<b><u>B0047</u></b>		<p><b>The Executive notes the issue raised, however, taxation, including property taxes/taxes on vacant dwellings is not a County Development Plan issue.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
iv) Submission raises detailed issues relating to Marlay Park including: <ul style="list-style-type: none"> <li>• Purported damage being caused to the Park due to the concerts each Summer and by the Council itself.</li> <li>• Specific landscaping proposals in the Masterplan for Marlay.</li> </ul>	<b>B0052</b>	5	The Executive notes the issue raised.  <b>It should also be noted that the day to day operation of the park as well as the organisation of individual concerts is an operational matter managed by the Council's Parks Department and are not County Development Plan matters.</b> The Masterplan for Marlay is an approved parks plan.  <b>Recommendation</b> No change to Draft Plan.
v) Concern that public services will be at capacity particularly with regard to public transport and school places, as a result of ongoing development, including SHD development, along the Green Luas Line, the N11 and the M50.	<b>B0079</b>		The Executive notes the issue raised.  As part of the Draft Plan process the Council have consulted with both the NTA who, are the providers of public transport for the city, and the Department of Education with regard to schools provision. Individual planning applications are assessed through the development management process and their impacts are assessed both individually and cumulatively. In terms of SHD development, the legislation that facilitates the SHD process is due to expire in early 2022, which will remove the option for developers to apply directly to An Bord Pleanála for planning permission.  <b>Recommendation</b> No change to Draft Plan.
vi) The submission notes that the residents of Jamestown Cottages Kiltiernan are surrounded by houses on 100mb broadband services, but they are still in ADSL ~7mb. If any works are planned under the Plan, this anomaly should be taken into account, in case there are requirements to lay wiring etc.	<b>B0117</b>	9	The Executive notes the issue raised.  <b>This is not considered a County Development Plan issue.</b>  <b>Recommendation</b> No change to Draft Plan.
vii) Opposes the development of a site in the Deansgrange/Foxrock area into residential blocks.	<b>B0160</b>		The Executive notes the issues raised.  Opposition to individual planning applications are a matter for the development management process <b>and are not County Development Plan issues.</b>  <b>Recommendation</b> No change to Draft Plan.

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>viii) Submissions raised issues relating to dog ownership as follows:</p> <ul style="list-style-type: none"> <li>• Dogs should be allowed off leash at all times on West Pier in Dún Laoghaire, or at designated times.</li> <li>• That provision be allowed for the exercise of large dogs in green area behind the West Pier.</li> <li>• Access from the car park at the pumping stations at Seapoint, and relevant signage.</li> <li>• Propose an extension of the existing 'off-leash' area at Seapoint and should include the West Pier (or at least the lower-level path) with access from the car park at the pumping stations at Seapoint and relevant signage in place.</li> <li>• Owners of dogs off leads in Fernhill being fined but no signage for dogs to be kept on leads.</li> <li>• A system of strong fines, and enforcement measures, for dogs allowed off the leash.</li> <li>• All faeces should be picked up and disposed of in accordance with the laws.</li> <li>• For these animals to exhibit good behaviour they need to be exercised properly, and off-leash exercise is much more effective.</li> </ul>	<p><b><u>B0217</u></b>  <b><u>B0724</u></b>  <b><u>B0858</u></b>  <b><u>B0872</u></b>  <b><u>B0901</u></b>  <b><u>B0924</u></b>  <b><u>B0988</u></b>  <b><u>B1020</u></b>  <b><u>B1137</u></b>  <b><u>B1151</u></b>  <b><u>B1156</u></b>  <b><u>B1170</u></b>  <b><u>B1176</u></b></p>		<p>The Executive notes the issue raised.</p> <p><b>The issues raised are operational matters and not matters for the County Development Plan.</b></p> <p><b>Recommendation</b>  No change to Draft Plan.</p>
<p>ix) Changes to the Common Agricultural Policy will require each state to develop A National Strategic Plan. This will impact on farmers. IFA request DLRC to give more credence to the working of the specific SPC administered by DLRC in the future.</p>	<p><b><u>B0302</u></b></p>		<p>The Executive notes the issues raised.</p> <p><b>The operation of the Council's strategic policy committees is not a County Development Plan issue.</b></p> <p><b>Recommendation</b>  No change to Draft Plan.</p>
<p>x) Submission states that:</p>	<p><b><u>B0302</u></b></p>		<p>The Executive notes the issues raised.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> <li>• IFA oppose any increase in Development Charges for once off Rural Housing</li> <li>• Agricultural (including farm buildings), equestrian and all forestry development should continue to be exempt from Development Charges.</li> <li>• IFA requests that people who buy or build a house in the countryside should agree to abide by a countryside lifestyle and not impede or object to normal farming practice.</li> <li>• All farm families should have the right to build a house and live in their local area.</li> <li>• Landowners should retain the right to sell a site should they need/want to and requests that more consultation should take place between the planning officers and prospective applicants prior to application for planning permission.</li> <li>• The newly drafted IFA code of practice should be implemented at all times.</li> </ul>			<p>The Draft Plan contains two main zoning objectives that relate to the rural area of Dún Laoghaire-Rathdown, Zoning Objective B: 'To protect and improve rural amenity and to provide for the development of agriculture', and Zoning Objective G 'To protect and improve high amenity areas'. The vast majority of the rural area is zoned 'Objective G', due to the high amenity value of the area. It is noted that the Draft Plan does not prohibit residential development in Objective 'G' (High Amenity) zoned lands, or under Objective 'B'. Policy PHP23 'Management of One-off Housing' sets out the criteria for considering one-off rural housing applications in High Amenity zoned lands and it is up to any individual landowner to demonstrate conformity with these criteria.</p> <p><b>The balance of the issues raised are not matters for the County Development Plan.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xi) Technical working group should be set up to improve broadband in the County – Council needs to invest in Communications Strategy and invest significantly in broadband provision/improvement. IFA suggest that that broadband is made available to all farmers and rural dwellers.</p>	<p><b><u>B0302</u></b> <b><u>B0905</u></b> <b><u>B0949</u></b></p>	<p>3</p>	<p>The Executive notes the issue raised.</p> <p>The provision of broadband and telecommunications infrastructure is addressed in Section 10.6.1, which states as follows:</p> <p><i>Policy Objective EI21:</i> <i>Telecommunications Infrastructure It is a Policy Objective to promote and facilitate the provision of an appropriate telecommunications infrastructure, including broadband connectivity and other technologies, within the County.</i></p> <p>It is noted that the Council is not a provider of telecommunications infrastructure, but instead is a facilitator of such provision.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
xii) Farmers, who wish to start a rural business on their farms, should be looked at more favourably by DLRCC when planning issues arise.	<b>B0302</b>		<p>The Executive notes the issue raised.</p> <p>Several types of rural business are permitted in principle under Zoning Objective 'B' – <i>To protect and improve rural amenity and to provide for the development of agriculture</i>. A range of rural businesses are also 'open for consideration'. Objective 'G' – <i>To protect and improve high amenity areas</i> also lists several types of rural business that are 'open for consideration'. Individual planning applications are considered on their merits.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
xiii) New business start-ups should receive an exemption from local authority rates for the first three years of operation, to support local enterprise development in rural areas. To support the commercial regeneration of village and town centres, which have been decimated in the recession, double tax relief on rental expenditure should be provided for businesses establishing in these areas.	<b>B0302</b>		<p>The Executive notes the issue raised.</p> <p><b>The setting of rates is an operational matter and not a matter for the County Development Plan.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
xiv) The entire planning process needs to be reviewed so that applications are assessed holistically and not in isolation from each other and the communities they serve.	<b>B0314</b>	10	<p>The Executive notes the issue raised.</p> <p><b>The functioning of the broader planning system is determined through the Planning and Development Act and Regulations and is not a matter for the County Development Plan.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
xv) Plastic grass should be discouraged.	<b>B0314</b>	10	<p>The Executive notes the issue raised.</p> <p>Where a development application is lodged with the Council, landscape plans are required for planning applications for 1000+sq. commercial development, 10+ residential units, or smaller developments (as deemed appropriate by the Planning Department). However, changes to existing development are generally carried out under the exempted development regulations and are not a matter for consideration by the Planning Department.</p> <p><b>Recommendation</b></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			No change to Draft Plan.
xvi) A critical review of the process and outcomes in enforcement proceeding should be undertaken. County Development Plan should state the measures that will be taken to strengthen the enforcement function and include an undertaking to publish relevant statistics.	<b><u>B0379</u></b>		The Executive notes the issue raised. <b>Enforcement is a function of the planning department and not a matter for County Development Plan policy.</b>  <b>Recommendation</b> No change to Draft Plan.
xvii) Agree with keeping the area apartment free until 2028 and after as there are too many new apartments being built here.	<b><u>B0418</u></b>	7	The Executive notes the issue raised.  The submitter doesn't reference the area in question, however, individual planning applications, including for apartment development, are assessed on their merits and the respective land use zoning objectives through the development management process  <b>Recommendation</b> No change to Draft Plan.
xviii) With regard to Old Connaught submission expresses a preference for bungalow or 2-storey dwellings built in short curving closes branching out from feeder roads as opposed to high-rise apartment blocks or straight streets.	<b><u>B0450</u></b>	14	The Executive notes the issue raised.  The Draft Plan includes an objective to prepare a Local Area Plan (LAP) for the Old Connaught area and this is the appropriate policy document through which to address local development typologies. Pre-draft submissions were sought on the LAP in early 2019 and an Area Based Transport Assessment (ABTA), which will feed into the LAP, is currently being prepared. The Executive would however have a concern that if the typology proposed were to be the sole housing type in the area compact growth would not be achieved.  <b>Recommendation</b> No change to Draft Plan.
xix) Submissions request: <ul style="list-style-type: none"> <li>• More bathrooms/public toilets are needed along the waterfront at Dún Laoghaire and in the Glasthule areas.</li> <li>• More accessible, safe, clean toilets needed in public areas, with an emphasis on safety and hygiene.</li> </ul>	<b><u>B0467</u></b> <b><u>B0937</u></b> <b><u>B1147</u></b>		<b>The Executive notes the issues raised, however, the provision of specific facilities such as toilets, are not a County Development Plan matter, rather they are an operational matter.</b>  <b>Recommendation</b> No change to Draft Plan.

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> <li>DLRCC needs to budget for these and consider locations such as DART/Luas car parks.</li> <li>Design of an app for location of public toilets and publish a map on Council's website.</li> </ul>			
xx) Submission raises anti-social behaviour issues regarding the linear park and woodland between Shrewsbury Road (nos. 18 to 48) and Castle Farm, Shankill	<b><u>B0533</u></b>	10	<p>The Executive notes the issues raised, however, anti-social behaviour is not Development Plan issue.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
xxi) Requests the owners/developers of the Kiltiernan Sports Hotel be required to demolish the incomplete hotel and apartment complex and restore the land to its original condition.	<b><u>B0544</u></b>	13	<p>The Executive notes the issue raised.</p> <p>Enforcement is a function of the planning department and not a matter for County Development Plan policy.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
xxii) Submission request that the Plan promote the use of sustainable timber products	<b><u>B0563</u></b>		<p>The Executive notes the issue raised. Promotion of the use of sustainable timber products is not a matter for County Development Plan policy.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
xxiii) The Council should consider the completion of sites already half built and abandoned, e.g. Sandyford Industrial Estate, Dundrum Road for housing and schools before building on new sites.	<b><u>B0587</u></b> <b><u>B0624</u></b>	6	<p>The Executive notes the issue raised.</p> <p>Where a property does not fall under the ownership of the Council, it is up to the individual landowner to progress a permitted development. There are, however, tools in legislation that are separate to the strategic County Development Plan that can be pursued in some circumstances, such as the vacant site levy, where a given site meets the relevant criteria. These tools form part of the Council's active land management function.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
xxiv) The submission requests that many additional sub sections with various extra Policy Objectives for multiple areas in the Draft Plan	<b><u>B0594</u></b>		The Executive notes the issues raised.

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
including the Rural Economy, Extractive industry, Wind, Commercial Developments in the countryside and commercial forestry. Various suggested wordings are provided.			<p>Whilst the proposed additional text and associated policies and objectives have been reviewed, it is considered that the narrative and associated Policy Objectives in the Draft Plan adequately address the subject matter. In addition, some of the suggested wording and the proposed additional policies and objectives have been extrapolated from other Development Plans which are mainly for rural counties and therefore some items are not directly applicable to DLR as a County.</p> <p><b>Recommendation</b> No change to Draft Plan</p>
xxv) Submission raises concerns with regard to developments within/adjoining Watsons Estate, Killiney and considers that various Policy Objectives and the Development Management section of the Draft Plan are not sufficient in protecting existing amenities and addressing the issue of developers submitting multiple planning application for sites in the area, increasing / changing density with each one.	<b><u>B0599</u></b>		<p>The Executive notes the issue raised.</p> <p>The application of policy and guidance with regard to development in specific areas would be considered through the development management process.</p> <p>In accordance with the Planning and Development Act, any person with the legal entitlement to do so can submit an application for planning permission on a site. Any person or group can also upon payment of a fee make an observation on any planning application. <b>It is not within the remit of the Planning Authority to alter primary legislation.</b></p> <p><b>Recommendation</b> No change to Draft Plan</p>
xxvi) DL RCC should take a proactive stance on the regulation and control of unhealthy food establishments. An assessment of food outlets in the area should be carried out and control measures implemented.	<b><u>B0627</u></b>		<p>The Executive notes the issue raised.</p> <p>The regulation of what are termed in the submissions as “unhealthy” food establishments is not a planning matter per se, however the Draft Plan does state in section 12.6.5 “Fast Food Outlets/Takeaways/restaurants that <i>“the careful consideration of the location of fast food outlets in the vicinity of schools and parks”</i> will be taken into account in the assessment of any proposals. Planning applications for food establishments are referred to the Environmental Health Officer through the development management system.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
xxvii) DL RCC should:	<b><u>B0627</u></b>		The Executive notes the issue raised.

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> <li>support community--based initiatives that develop programmes that support healthy lifestyles.</li> <li>implement a strategy to look at food poverty within the County to ensure that affordable healthy food choices are available to all.</li> </ul>			<p><b>The establishment and support of community-based health initiatives and the implementation of a food poverty strategy within the County not a matter for the County Development Plan.</b> It is, however, noted that healthy lifestyles are supported through the Draft Plan, which includes the 'creation of an inclusive and healthy County' as one of the Plan's Five strategic County Outcomes (Table 1.4). A range of policies and objectives are included in the Draft Plan to support this outcome, with regard to healthy placemaking, urban greening, open space and recreation, support for a modal shift toward walking and cycling, and through the inclusion of Policy Objective PHP15: Healthy County Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
xxviii) Increased crime rates related to lack of facilities for youth.	<b>B0773</b>		<p>The Executive notes the issue raised.</p> <p><b>The provision of youth facilities is an operational matter and not a matter for the County Development Plan.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
xxix) Submission request no more developments in Glencullen, Stepside, Sandyford area.	<b>B0775</b>	5 9 12	<p>The Executive notes the issue raised.</p> <p>Individual developments are considered on their merits through the development management process. It is not proposed to implement blanket bans on development going forward.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
xxx) Lisieux Hall permission needs to be reviewed – it is a strategic location for the area and another project for the community could be made here, instead of profit.	<b>B0775</b>	5 9 12	<p>The Executive notes the issue raised.</p> <p>Planning permission was granted for a development comprising 200 apartments at the Lisieux Hall site in Leopardstown by An Bord Pleanála through the Strategic Housing Development (SHD) process in October 2020 (TA06D.307415). It is not possible to review an existing planning permission in this context. <b>The review of any planning decision is not a County Development Plan issue.</b></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xxxii) There is a need for balance in the provision of funding between commercial rates and property tax. The upward trend of commercial rates cannot be sustained together with an increasing Local Property Tax.</p>	<b>B0840</b>		<p>The Executive notes the issue raised.</p> <p><b>Commercial rates and property tax are operational matters and not matters for the County Development Plan.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xxxiii) Any further development including SHDs should be stopped until the new Distributor Road is built (in Kiltiernan Glenamuck).</p>	<b>B0847</b>	9	<p>The Executive notes the issue raised.</p> <p>The Glenamuck District Distributor Road Scheme is an integral part of the adopted Kiltiernan/Glenamuck LAP and fundamental to one of the principle objectives of the Plan – the establishment of a pedestrian friendly, lightly trafficked Village core for Kiltiernan. As such, the LAP provides guidance on the quantum of dwellings that can be provided in advance of the delivery of the new roads, with 700 units permissible in advance of the delivery of the Glenamuck District Distributor Road Scheme roads.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xxxiii) Kiltiernan Glenamuck have constant problems with electricity and water outages – ESB lines cannot cope with the amount of new building.</p>	<b>B0847</b>	9	<p>The Executive notes the issue raised.</p> <p>Individual planning applications are considered on their merits. This includes consideration of local infrastructure issues, <b>however, the ESB and Irish Water are responsible for water and electricity provision.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xxxiv) Submission requests the following:</p> <ul style="list-style-type: none"> <li>• Investigate the use of cameras on various rural roads (listed) to reduce dumping and cars racing/crashing.</li> <li>• Investigate the purchase or restoring access to the Old Mill Pond at the</li> </ul>	<b>B0869</b>	10 14	<p>The Executive notes the issues raised.</p> <p><b>They are not County Development Plan issues.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
<p>Roadstone site in Rathmichael and its potential refurbishment as an amenity.</p> <ul style="list-style-type: none"> <li>Floodlighting of Old Railway Bridge, Cherrywood Road to increase amenity value.</li> </ul>			
<p>xxxv) Investigate water table levels beneath Dún Laoghaire Golf Course and the effect of pumping from the aquifer. Request that the results to be publicly available.</p>	<b>B0869</b>	14	<p>The Executive notes the issue raised.</p> <p><b>This is not a matter for the County Development Plan.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xxxvi) Insist as part of grant of planning for Dún Laoghaire golf course extension that fire department and forestry services have free access to proposed water storage tank on Pucks castle Lane/ Murphys lane for firefighting.</p>	<b>B0869</b>	14	<p>The Executive note the issue raised.</p> <p><b>Individual planning applications are a matter for the development management process and are not matters for the County Development Plan.</b> Observations/submission can be made on planning applications for consideration through that process.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xxxvii) Objection to the proposed development. (proposed development not stated, person lives in Kiltiernan).</p> <p>The proposed development is not good for sustainable community development and will radically alter the amenity of the local area. Developing the areas around Kiltiernan village should be undertaken with caution and sympathy - that is not apparent from the document published. The proposed development will have a negative effect on house values due to the despoiling of the natural beauty and scenery which forms a major part of the attraction for prospective house</p>	<b>B0927</b>	9	<p>The Executive notes the issue raised.</p> <p>The submitter has expressed an objection to a 'proposed development' but has not indicated whether this relates to a specific planning application, or to the provisions of the Draft Plan more generally. Objections to individual developments should be made through the development management process.</p> <p>It is noted that a Local Area Plan (LAP) has been prepared for Kiltiernan. The LAP was adopted in 2013 and extended in 2018. The LAP will expire in 2023.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
purchasers and it will have a negative visual impact on the landscape of the area.			
xxxviii) Urgent consideration should be given to the provision of a One-Stop Shop service for the owners of buildings to harmonise DLRC's diverse functions.	<b><u>B0929</u></b>		<p>The Executive notes the issue raised.</p> <p><b>This is an operational matter and not a matter for the County Development Plan.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
xxxix) Submission provides support for a range of Policy Objectives in multiple Chapters of the Draft Plan.	<b><u>B0942</u></b>		<p>The Executive welcomes the support.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
xli) Roads and pavement are in disrepair and need repair at same time as works from other departments eg. Drainage so road is not continuously dug up for different issues.	<b><u>B0949</u></b>	3	<p>The Executive notes the issue raised.</p> <p><b>This is an operational issue and not a matter for the County Development Plan.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xlii) Request that DLRC provide a supportive policy framework for the future provision of postal infrastructure. Request the inclusion in the County Development Plan of following policies:</p> <ul style="list-style-type: none"> <li>• <i>“To support An Post in the provision of new postal facilities and the enhancement of existing facilities, including operational requirements, in Dún Laoghaire-Rathdown.”</i></li> <li>• <i>“To facilitate the provision of postal infrastructure at suitable locations in Dún Laoghaire-Rathdown.”</i></li> <li>• <i>“To promote the integration of appropriate post office facilities within new and existing communities that are appropriate to the size and scale of each settlement</i></li> </ul>	<b><u>B0950</u></b>		<p>The Executive notes the issues raised.</p> <p>Notwithstanding An Post's role in the provision of an important service, it is not considered appropriate to include a specific reference to that organisation, in the context requested by the submitter, in the Draft Plan. Individual planning applications are determined on their merits through the development management system and all applicants, including semi-state bodies, are treated equally.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
xlii) Too many developments being permitted around Lamb's Cross – adding to traffic congestion – needs to stop.	<b><u>B1020</u></b>		<p>The Executive notes the issue raised.</p> <p><b>Individual development applications are a matter for the development management process, through which each proposal is considered on its merits and in the context of local infrastructural capacity and development activity.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
xliii) Request that DLR co-ordinate with the rest of the Dublin Metropolitan Area to ensure consistency in planning and development across the four Local Authorities	<b><u>B1047</u></b>		<p>The Executive notes the issue raised.</p> <p>Dún Laoghaire-Rathdown County Council currently participates in the Regional Spatial and Economic Strategy (RSES) and the Metropolitan Area Strategic Plan (MASP) implementation group, which ensures coordination across the four Dublin local authorities. The planning Authority also liaise with their sister local authorities in Dublin and also with Wicklow County Council on matters pertaining to planning.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
xliv) County Development Plan needs to be long term sustainability and citizen needs driven, not developer driven.	<b><u>B1056</u></b>		<p>The Executive notes the issue raised.</p> <p>The Draft Plan contains a broad range of objectives to address citizen needs, through zoning objectives, objectives related to climate change, an additional c.250 protected structures and additional architectural conservation areas, etc. These objectives, however, must be balanced with the need for new housing development that has been identified through the core strategy, in order to accord with both the NPF and the RSES. It is considered that the Draft Plan strikes a reasonable balance in this regard.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
xlv) Lands west of Enniskerry Road must be protected in terms of height, density and views.	<b><u>B1056</u></b>		<p>The Executive notes the issue raised.</p> <p>The lands to the west of the Enniskerry Road are generally zoned Objective 'G' - <i>To protect and improve high amenity areas</i>, or Objective 'B' - <i>To protect and improve rural amenity and to provide for the development of agriculture</i>. There are also objectives within this area for the</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>protection of views. The area immediately around Kiltiernan is covered by the Kiltiernan/Glenamuck LAP. Additional protections are in place on lands to the south-west of the County, in the form of the Wicklow Mountains Special Areas Conservation (SAC) and the Wicklow Mountains Special Protection Area (SPA).</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xlvi) Submission seeks active investment in activities that reduce digital poverty and would welcome a strategy of supporting the community in becoming more digitally confident. Also requests that the network of free wifi-fi hotspots is increased across the County.</p>	<b>B1075</b>		<p>The Executive notes the issue raised.</p> <p>The provision of broadband and telecommunications infrastructure is addressed in Section 10.6.1, which states as follows:</p> <p><i>Policy Objective EI21:</i> <i>Telecommunications Infrastructure It is a Policy Objective to promote and facilitate the provision of an appropriate telecommunications infrastructure, including broadband connectivity and other technologies, within the County.</i></p> <p>As such, the Draft Plan seeks to facilitate the roll-out of digital infrastructure, <b>however, the provision of wi-fi hotspots and the advancement of digital confidence in the community are operational matters.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xlvii) Submission agrees that it would be good to retain the Bakers Corner pub building on the streetscape as a protected structure but that the remainder of the site is not very attractive nor in need of preservation.</p>	<b>B1132</b>		<p>The Executive notes the issue raised.</p> <p>The Baker's Corner Public House has not been added to the Record of Protected Structures in the Draft Plan and, instead, is afforded protection, as part of the streetscape, through SLO 41 (Map 7), which states as follows:</p> <p><i>To seek the retention of the existing streetscape at Baker's Corner, which comprises Baker's Corner Public House and its ancillary envelope of structures.</i></p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p>The zoning of the site, Neighbourhood Centre, seeks to protect, provide for and-or improve mixed-use neighbourhood centre facilities, subject to retaining an appropriate balance of uses.</p> <p>The existing public house is not considered to meet the criteria for inclusion onto the RPS, however, any historic value of the building or its features would be assessed having regard to Policy Objective HER20: Buildings of Vernacular and Heritage interest.</p> <p>The submitter's comments re: the ancillary envelope of structures are noted, however, it is considered that they contribute to the setting and value of the public house and enhance the streetscape. It is also noted that the SLO is focused on the retention of the streetscape and does not relate to the balance of the site.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xlvi) Requests for more improved signage which include old Irish script.</p>	<p><b><u>B1188</u></b></p>		<p>The Executive notes the issue raised.</p> <p>This matter has been addressed under Section 5.7.10 Policy Objective T31: Directional/Information/Waymarking Signage <i>"It is a Policy Objective to provide directional signage for amenities, tourist attractions and local attractions and along cycle and pedestrian routes (waymarking) at appropriate locations throughout the County in accordance with planning and traffic regulations"</i>.</p> <p><b>The specific location and text of signage is an operational matter and not a matter for the County Development Plan.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>xlvi) Planners should treat Rathmichael area as an area for architectural and environmental consideration.</p>	<p><b><u>B1220</u></b></p>	<p>10</p>	<p>The Executive notes the issue raised.</p> <p>The Draft Plan includes an objective to prepare a Local Area Plan for the Rathmichael area, which is the appropriate context in which to consider more fine grain, local issues, such as those referenced by the submitter.</p>

Issues	Sub. No.	Map No.	Executive's Response & Recommendation
			<p><b>Recommendation</b> No change to Draft Plan.</p>
<p>l) Submission relates to a review of Kiltiernan Glenamuck LAP – proposal of a carbon neutral community centre with housing for pensioners surrounding it.</p>	<b><u>B1257</u></b>	9	<p>The Executive notes the issue raised.</p> <p>The Kiltiernan Glenamuck LAP was adopted in September 2013 and extended in June 2018 for a further period up to and including September 2023. The LAP will be reviewed during the lifetime of the Development Plan and that is the appropriate time for submissions regarding the LAP.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<b>3.32.2: Formatting, Presentation and Consultation Issues</b>			
<p>i) Submission relate to layout formatting and language of the Plan as follows:</p> <ul style="list-style-type: none"> <li>• More effort needs to be made to make the plan more accessible as it is quite complex and uses legal wording.</li> <li>• Submission raises issue in relation to the layout and format of the Draft Plan.</li> <li>• Recommend formatting landscape pages to display as a landscape-oriented page, the file required multiple edits to be comfortable to read.</li> </ul>	<p><b><u>B0594</u></b> <b><u>B0749</u></b> <b><u>B0861</u></b> <b><u>B1206</u></b></p>		<p>The Executive notes the issues raised.</p> <p>The Executive fully acknowledge that the County Development Plan is a complex and lengthy suite of documents. Whilst efforts were made to keep the Draft Plan short and concise the myriad of content required including some of the newer requirements such as HNDA, SFRA, Statement of Consistency with Guidelines, SEA and AA all make it near on impossible to reduce the word count.</p> <p>Considerable thought and planning went into the format, layout and language used in the Plan bearing in mind the multiple users. The National Adult Literacy Agency has produced the Plain English Guidelines which recommend 14 steps for plain English. The Planning Authority aimed to meet the guidelines, however, the legislative requirements of what must be contained in a County Development Plan must take precedence and by their nature Development Plans contain some complex language.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>ii) Raises concerns that the plan is being launched in draft form at a time when due to Covid-19 one cannot meet to review / discuss the plan.</p>	<b><u>B0599</u></b>		<p>The Executive notes the issue raised. In recognition of the challenges due to Covid 19 restrictions the Draft Plan was on display for over 13<sup>th</sup> weeks which is longer than the statutory requirement. The Council also developed an innovative 3D virtual room so as to allow the public to interact with and make submissions to the dlr Draft County Development</p>

Issues	Sub. No.	Map No.	Executive’s Response & Recommendation
			<p>Plan 2022 -2028. The Council are aware that many resident associations and groups throughout the County met online so as to discuss and agree submissions on the Draft Plan.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iii) There should be a forum for open communication and cooperation between the Council, commercial interests, and the community.</p>	<p><b><u>B0905</u></b></p>		<p><b>The Executive notes the issues raised, however, this is not a County Development Plan matter.</b></p> <p><b>Recommendation</b> No change to Draft Plan.</p>
<p>iv) Public consultation hub is very accessible, and the individual documents are well laid out. Welcome the design, attention to detail and general vision of the planners for DLR region. Also welcome the layout and virtual room options.</p> <p>Found it difficult to read through the full document as each Chapter seemed to be a separate PDF which made it difficult to do a search for elements within the overall plan.</p>	<p><b><u>B1206</u></b> <b><u>B1132</u></b></p>		<p>The Executive notes the issues raised and welcome the positive comments made and particularly those relating to the consultation hub.</p> <p><b>Recommendation</b> No change to Draft Plan.</p>



## **Part 4: Appendices to Chief Executive's Report**



#### 4.1: Appendix 1 - Chief Executive's Draft Plan Errata

Chapter / Section	Pg. No.	Errata
<b>General</b>		
All (as required)		Update all section and/or Policy Objective numbers as required.
<b>Chapter 1</b>		
1.6.1	15	Add text: <i>“Where Policy Objectives and supporting text refer to specific legislation, Planning Guidelines or Policy documents and in the event that new or updated versions of these are published it shall be taken as read that the most up to date versions shall apply.”</i>
<b>Chapter 5</b>		
5.7.9	114	Amend “people” with disabilities to “ <b>persons</b> ” in Policy Objective T30.
<b>Maps</b>		
Map 13		Amend Protected Structure polygon at Kiltiernan Golf & Country Club to correctly align with the building subject of the protection under RPS No. 1861



## 4.2: Appendix 2: Acronyms

AA:	Appropriate Assessment	DLR CYPSC:	Dún Laoghaire-Rathdown Children and Young People's Services Committee
ABTA:	Area Based Transport Assessment	DLUFP:	Dún Laoghaire Urban Framework Plan
ACA:	Architectural Conservation Area	DMP:	Dublin Mountain Partnership
AFA:	Area for Further Assessment (Flooding)	DMURS:	Design Manual for Urban Roads and Streets
AHB:	Approved Housing Body	DTTaS:	Department of Transport, Tourism and Sport
BER:	Building Energy Rating	ECFRAM:	Eastern Catchment Flood Risk Assessment and Management Plan
BID:	Business Improvement District	EIA:	Environmental Impact Assessment
BRT:	Bus Rapid Transit	EIAR:	Environmental Impact Assessment Report
cACA:	Candidate Architectural Conservation Area	EMRA:	Eastern and Midlands Regional Assembly
CARO:	Climate Action Regional Office	EPA:	Environmental Protection Agency
CCAP:	Climate Change Action Plan	ESB:	Electricity Supply Board
CDP:	County Development Plan	ESRI:	The Economic and Social Research Institute
CFRAM:	Catchment Flood Risk Assessment and Management	EU:	European Union
CMP:	Construction Management Plan	EV:	Electric Vehicle
CNG:	Compressed Natural Gas	FRS:	Flood Relief Scheme
CPO:	Compulsory Purchase Order	GAA:	Gaelic Athletic Association
CSO:	Central Statistics Office	GDA:	Greater Dublin Area
DAP:	Drainage Area Plan	GI:	Green Infrastructure
DCHG:	Department of Culture, Heritage and the Gaeltacht	GSI:	Geological Survey Ireland
DART:	Dublin Area Rapid Transit	HEFS:	High end Future Scenario
DC:	District Centre	HNDA:	Housing Need and Demand Assessment
DCC:	Dublin City Council	HSE:	Health Service Executive
DEBP:	Dublin Eastern Bypass	HTF:	Housing Supply Coordination Task Force
DEDP:	Destination and Experience Development Plan	IADT:	Institute of Art, Design and Technology
DES:	Department of Education and Skills	ICPSS:	Irish Coastal Protection Strategy Study
DHPLG:	Department of Housing, Planning and Local Government (previously DHPCLG, DECLG, DEHLG)	IFI:	Inland Fisheries Ireland
DLR:	Dún Laoghaire-Rathdown County Council	KPI:	Key Performance Indicator
DLR JPC:	Dún Laoghaire-Rathdown Joint Policing Committee	LAP:	Local Area Plan
DLR LCDC:	Dún Laoghaire-Rathdown Local Community Development Committee	LCDC:	Local Community Development Committees

LECP:	Local Economic and Community Plan
LEO:	Local Enterprise Office
LPG:	Liquefied Petroleum Gas
LSSIF:	Large Scale Sport Infrastructure Fund
MASP:	Metropolitan Area Strategic Plan
MRFS	Mid Range Future Scenario
MTC:	Major Town Centre
NC:	Neighbourhood Centre
NDP:	National Development Plan
(p)NHA:	(proposed) Natural Heritage Area
NIFM	National Indicative Fluvial Mapping
NMPF:	National Marine Planning Framework
NPF:	National Planning Framework
NPO:	National Policy Objective
NPWS:	National Parks and Wildlife Service
NSO:	National Strategic Outcome
NTA:	National Transport Authority
NZEB:	Nearly Zero Energy Building
OPR:	Office of the Planning Regulator
OPW:	Office of Public Works
OSI:	Ordnance Survey Ireland
PCMSP:	Pilot Coastal Monitoring Survey Programme
PDA:	Planning and Development Act, 2000 (as amended)
PFRA:	Preliminary Flood Risk Assessment
PPN:	Public Participation Network
PV:	Photovoltaic
QBC:	Quality Bus Corridor
RDCA	Residential Development Capacity Audit
RMP:	Record of Monuments and Places
ROW:	Right of Way
RPO:	Regional Policy Objective
RSES:	Regional Spatial and Economic Strategy
RSO:	Regional Strategic Outcome
RPS:	Record of Protected Structures

SAC:	Special Area of Conservation
SBD:	Sandyford Business District
SDCC:	South Dublin County Council
SDZ:	Strategic Development Zone
SEA:	Strategic Environmental Assessment
SEAI:	Sustainable Energy Authority of Ireland
SEC:	Sustainable Energy Community
SFRA:	Strategic Flood Risk Assessment
SHD:	Strategic Housing Development
SLO:	Specific Local Objective
SLR:	Strategic Land Reserve
SMART:	Specific, Measurable, Assignable, Realistic and Time- Related
SNI:	Sustainable Neighbourhood Infrastructure
SPA:	Special Protection Area
SPC:	Strategic Policy Committee
SPPR:	Specific Planning Policy Requirement
S2S:	Sutton to Sandycove Cycleway
SuDS:	Sustainable Drainage Systems
SUFP:	Sandyford Urban Framework Plan
TEN-T:	Trans European Transport Network
TII:	Transport Infrastructure Ireland
UCD:	University College Dublin
UN:	United Nations
UNESCO:	UN Educational, Scientific and Cultural Organization
URDF:	Urban Regeneration and Development Fund
WCC:	Wicklow County Council
WWTW:	Wastewater Treatment Works

### 4.3: Appendix 3: Legislative Background

This Chief Executive's report has been prepared in accordance with section 12 (4) of the Planning and Development Act, 2000, (as amended). Section 12 (4) (a) states that

*“Not later than 22 weeks after giving notice under subsection (1) and, if appropriate, subsection (3), the Chief Executive of a planning authority shall prepare a report on any submissions or observations received under subsection (2) or (3) and submit the report to the members of the authority for their consideration.*

*(aa) A Chief Executive's report prepared for the purposes of paragraph (a) shall be published on the website of the planning authority concerned as soon as practicable following submission to the members of the authority under paragraph (a)*

*(b) A report under paragraph (a) shall—*

*(i) list the persons or bodies who made submissions or observations under this section,*

*(ii) provide a summary of —.....*

*(II) the recommendations, submissions and observations made by the Office of the Planning Regulator, and*

*(III) the submissions and observations made by any other persons,*

*in relation to the draft development plan in accordance with this section, ]*

*(iii) give the response of the Chief Executive to the issues raised, taking account of any directions of the members of the authority or the committee under section 11(4), 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 of the Government or of any Minister of the Government and, if*

*appropriate, any observations made by the Minister for Arts, Heritage, Gaeltacht and the Islands under subsection (3)(b)(iv).*

*(ba) A report prepared and submitted in accordance with paragraph (a) shall contain a summary of the observations, submissions and recommendations made by the Office of the Planning Regulator under section 31AM to the planning authority concerned. ]*

*(bb) In the case of each planning authority within the GDA, a report under paragraph (a) shall summarise the issues raised and the recommendations made by the DTA in its written submission prepared in accordance with section 31C and outline the recommendations of the Chief Executive in relation to the manner in which those issues and recommendations should be addressed in the development plan. ]*

*(bc) A report under paragraph (a) shall summarise the issues raised and recommendations made by the relevant regional assembly in its written submission prepared in accordance with section 27B (inserted by section 18 of the Act of 2010 ) and outline the recommendations of the Chief Executive in relation to the manner in which those issues and recommendations should be addressed in the development plan.”*





