

Kiltiernan-Glenamuck
Local Area Plan 2024
Chief Executive's Report on
Pre-Draft Public Consultation
February 2024

Contents

List of Acronyms	3
1. Introduction.....	4
2. Overview of Submissions received from Prescribed Bodies	7
2.1 Submission / Observation from the Office of the Planning Regulator	7
2.2 Submissions / Observations from the National Transport Authority (NTA), Transport Infrastructure Ireland (TII) and the Department of Transport (DoT).....	9
2.3 Submission / Observation from the Department of Education	12
2.4 Submission / Observation from the Department of Housing, Local Government and Heritage	12
2.5 Submission / Observation from the Department of Environment, Climate & Communications, incorporating the Geological Survey of Ireland	14
2.6 Submission / Observation from the Health Service Executive – Environmental Health Office	16
2.7 Submissions / Observations from the Office of Public Works and Uisce Éireann	17
2.8 Submission / Observation from the Dublin Airport Authority	18
3. Overview of Issues Raised by Other Persons	19
3.1 ‘Kiltiernan’ or ‘Kiltiernan’?	19
3.2 Objectives of the Previous Plan	20
3.3 Local Facilities & Services.....	21
3.4 School Provision.....	22
3.5 Housing Policy and Development Framework	23
3.6 Climate Action.....	26
3.7 Transport & Movement	26
3.8 Biodiversity & Open Space.....	30
3.9 Infrastructure & Flood Risk.....	31

3.10	Employment & Tourism	32
3.11	Heritage	32
3.12	Phasing & Implementation	33
3.13	LAP Boundary.....	33
3.14	Zoning & Land Use	34
3.15	Other Issues	36
4.	Student Consultation.....	37
5.	Next Steps	38

List of Acronyms

AA:	Appropriate Assessment	LTP:	Local Transport Plan
ABTA:	Area Based Transport Assessment	NDIS:	National Disability Inclusion Strategy (2017-2022)
BTR:	Build-to-Rent	NDP:	National Development Plan
CAP:	Climate Action Plan	NIFTI:	National Investment Framework for Transport in Ireland
CARO:	Climate Action Regional Office	NPF:	National Planning Framework
CDP:	County Development Plan	NPO:	National Planning Objective
DAA:	Dublin Airport Authority	NSMP:	National Sustainable Mobility Policy
DECC:	Department of the Environment, Climate & Communications	NTA:	National Transport Authority
DHLGH:	Department of Housing, Local Government and Heritage	NZEB:	Nearly zero-emission building
DoE:	Department of Education	OPR:	Office of the Planning Regulator
DoT:	Department of Transport	OPW:	Office of Public Works
DMURS:	Design Manual for Urban Roads and Streets	RPO:	Regional Planning Objective
DPH:	Dwellings per hectare	RSES:	Regional Spatial and Economic Strategy
EMRA:	Eastern and Midland Regional Authority	SEA:	A Strategic Environmental Assessment
GDDR:	Glenamuck District Distributor Road	SFRA:	Strategic Flood Risk Assessment
GDRS:	Glenamuck District Roads Scheme	SPPR:	Specific Planning Policy Requirement
GLDR:	Glenamuck Link Distributor Road	SuDS:	Sustainable Drainage Systems
GSI:	Geological Survey of Ireland	TAP:	Traveller Accommodation Programme
HSE:	Health Service Executive	TEN-T:	Trans-European Transport Network
KGLAP:	Kiltiernan-Glenamuck Local Area Plan	TII:	Transport Infrastructure Ireland
LAP:	Local Area Plan	UE:	Uisce Éireann
		UNCRPD:	United Nations Convention on the Rights of Persons with Disabilities

1. Introduction

1.1 Public Consultation

The Pre-Draft Public Consultation for the Kiltiernan-Glenamuck Local Area Plan (KGLAP) ran for a 4 week period of 4 from Tuesday 12th September 2023 to Tuesday 17th October 2023. During this period, two public information drop-in events were held in Kiltiernan, on Thursday 21st September and Wednesday 11th October 2023. Both sessions were very well attended.

To help inform the pre-draft consultation, the Planning Team prepared:

- An Issues Paper with accompanying Maps and Figures that pulled together baseline information by way of a study of various themes relevant to the area, and
- An online StoryMap which provided context for the area and the plan-making process.

The pre-draft documents were available to view:

- Online through a bespoke Kiltiernan-Glenamuck LAP webpage and the council’s consultation hub, citizen space.
- Hard copies were available to view in County Hall in Dún Laoghaire and the Council Offices in Dundrum, and at the public information events, and,
- In all dlr Libraries.

The pre-draft consultation was publicised through statutory notices in the Irish Times, on the dlr website, in the dlr Times (Autum 2023 edition) and through dlr social media channels – Facebook, X (formerly twitter) and Instagram.

A total of 109 no. written submissions/observations were received from the public.

In addition to the more traditional public information events, the planning team visited a local school – Our Lady of The Wayside N.S. to obtain the views of some local children. More detail on this consultation is set out in Section 4.



1.2 Submissions Received

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

An overview of submissions received from Prescribed Bodies is set out in Section 2. The submissions received from other persons covered a wide range of issues which have been grouped under a number of themes in section 3 of the report. The image on the next page illustrates some of the main issues raised.

In addition to written submissions received through the council's consultation online hub, a strengths, weaknesses, opportunities and threats (SWOT) board was set up at each public information session. Attendees were asked to add their opinions to the board. Photos of each section of this board is set out in Section 5 of this report. A similar approach was taken with local school children, the outcome of that event is set out in Section 4 of this report.

1.3 Report Structure

The Report is structured to provide a high-level summary of submissions received from prescribed bodies and the issues raised by other interested persons, including the general public, landowners, community / residents' groups and children from a local school.

Issues will be grouped under overarching themes and will broadly outline how the Executive intends to address these issues (in the form of a potential policy / objective focus) in the Draft Local Area Plan.

The report is laid out as follows:

- Section 1: Introduction.
- Section 2: Submissions received from Prescribed Bodies.
- Section 3: Issues Raised in Submissions / Observations received from other persons.
- Section 4: Student Consultation
- Section 5: Public Information Event SWOT Board
- Section 6: Next Steps

The following report is intended to give a synopsis of submissions received summarising issues raised and does not purport to reflect every comment made in the 109 submissions received. One submission did not have any content but was accepted as a valid submission and has therefore been included in the overall number received.



2. Overview of Submissions received from Prescribed Bodies

2.1 Submission / Observation from the Office of the Planning Regulator

The submission from the Office of the Planning Regulator (OPR) sets out their role and obligations under the provisions of Section 31AO of the Planning and Development Act, 2000 (as amended). The OPR is required to evaluate and assess local area plans (LAP's) to ensure that they are aligned with:

- The National Planning Framework (NPF)
- The Regional Spatial and Economic Strategy (RSES)
- Section 28 Ministerial Guidelines
- The County Development Plan 2022-2028.

i. Overview of OPR Submission

In their submission, the OPR notes that Kiltiernan-Glenamuck is identified in the Eastern & Midland Regional Assembly's RSES as a new residential community with a mixed use centre along the Metrolink / Luas Greenline Corridor. It is noted that part of the LAP lands are zoned for employment use adjacent to The Park, Carrickmines

It is noted that both the NPF and the RSES highlight the importance of opportunities for regeneration to create attractive, liveable, and high quality urban places and refers Policy Objective in the County Development Plan 2022-2028 which refers to neighbourhood centres as acting as a focal point for communities that they serve – a neighbourhood centre zoning objective exists within the LAP area.

It is acknowledged that significant development has occurred in the area in recent years and that there were a number of objectives in both the 2007 and 2013 LAP's for the area to support existing and new communities including:

- A bypass road
- A neighbourhood framework plan / village core
- Graduation of densities with highest being closest to the Luas.
- Provision of public open space and a school site.

It is noted that the residential densities of permitted developments are generally consistent with density bands in the 2013 LAP, however, there are instances where density has been exceeded.

ii. Recommendations arising from the OPR Submission

The OPR encourages the Planning Authority to liaise with EMRA with regard to how the RSES relates to the LAP.

There is a need to review and strengthen density standards in the draft LAP having regard to S.28 guidelines and consider the delivery of housing in locations that are well served by physical infrastructure, walking cycling and public transport.

The LAP should take into consideration how SLO82 at The Park, Carrickmines is to be fulfilled during the plan period and needs to consider how facilitation of retail facilities to provide for the anticipated population growth.

The integration of land use and transportation is set out in NPF and RSES. In this regard, the OPR welcomes the preparation of a Local Transport Plan (LTP) using an Area Based Transport Assessment (ABTA). The delivery of an effective transport network is crucial to ensure the delivery of the plan, to that end, the OPR notes the limitations of the existing road networks which require investment and upgrading particularly with regard to active travel measures. The progress of the Glenamuck District Roads Scheme (GDRS) is welcomed, however, improved sustainable transport modes will be critical to ensure that new neighbourhoods

are not car dependant. It is therefore strongly advised to liaise with NTA and TII in the preparation of the ABTA / LTP. The LAP should be consistent with the NTA Transport Strategy for the Greater Dublin Area.

Reference to climate action in the issues paper are welcomed. There are a number of National Policy Objectives (NPO's) in the NPF with regard to climate action that the LAP needs to be consistent with including NPO53, NPO54, NPO55, NPO57. With regard to the plan area, flood risk management is a critical adaption measure, therefore a strategic flood risk assessment (SFRA) should be carried out.

The LAP needs to be consistent with a number of NPO's in the NPF with regard to environmental protection, including NPO58, NPO62, NPO63 and NPO64.

The LAP should be informed by:

- a social/civic infrastructure audit to identify need for community centres, leisure, amenity and cultural facilities with sustainable access for all. In particular it is noted that there is a potential need for additional schools in the area and recommends consultation with the Department of Education. Such facilities should be integrated with walking and cycling networks.
- The Local Authority's Traveller Accommodation Programme (TAP).
- An evidenced based approach to employment and commercial uses.
- A Local Transport Plan (LTP) / Area Based Transport Assessment (ABTA).
- A Strategic Flood Risk Assessment (SFRA)
- A Strategic Environmental Assessment (SEA)
- An Appropriate Assessment (AA)

The OPR recommends that the draft LAP should include the following:

- A revised development framework for the NC site with appropriate layout, massing, permeability, green infrastructure, SuDS etc.
- A policy framework to support utilisation of existing buildings, brownfield/infill sites and derelict or underutilised sites including proactive activation measures aligned with funding.
- Objectives to ensure the provision of childcare and education facilities in well located sites, close to the existing built up area.
- Objectives to ensure the timely delivery of an appropriate range of facilities to meet the needs of a growing population.
- Objectives to ensure active travel and sustainable mobility patterns are prioritised between residential and mixed use / employment lands.
- Objectives that set out requirements to reduce car use and increase sustainable journeys in the Climate Action Plan and National Sustainable Mobility Policy.
- Ambitious but realistic modal shift targets and be consistent with the Avoid-Shift-Improve principles and 10-min town concept.
- Climate mitigation objectives in LAP which are critical in achievement of GG gas emission reduction targets to mitigate climate change.
- Sustainable water management solutions such as SuDS and noting nature based solutions and the integration of green / blue infrastructure and positive impacts on biodiversity.
- Objectives with regard to the built heritage.
- Provisions for monitoring and implementation.

Chief Executive's Response and Recommendation

The Chief Executive notes and welcomes the submission from the Office of the Planning Regulator and will ensure that the Draft Local Area Plan is evidence based and informed by the recommended reports / studies listed within the submission and the Draft LAP will include provision for the recommended policy / objectives set out within the submission as summarized in Section 2.1 ii of this report.

2.2 Submissions / Observations from the National Transport Authority (NTA), Transport Infrastructure Ireland (TII) and the Department of Transport (DoT)

A number of items set out in the submission from the NTA are also contained within submissions from Transport Infrastructure Ireland (TII) and The Department of Transport (DoT), in this regard, this section of the report will incorporate an overview of these submissions followed by a combined set of recommendations arising from these submissions.

i. Overview of the NTA Submission

At the outset, the submission received from the NTA notes their willingness to work with and assist the planning Authority in the preparation of the LAP and refers to the Greater Dublin Area Transport Strategy 2022-2042 that includes a number of objectives and guidance to be taken into account in the LAP.

The NTA reference the National Sustainable Mobility Policy (NSMP) which seeks to deliver at least 500,000 additional daily active travel and public transport journeys and 10% reduction in km driven fossil fuelled cars by 2030. In addition the submission refers to the National Investment Framework for Transport in Ireland (NIFTI) which guides transport investment and sets out a road hierarchy and an intervention hierarchy as follows:

Road Use Hierarchy	Road Intervention Hierarchy
1. Active Travel (Walking & Cycling)	1. Maintain
2. Public Transport	2. Optimise
3. Private Vehicles	3. Improve
	4. New

Reference is made to the Climate Action and Low Carbon Development (Amendment) Act 2021 that requires a reduction of emissions by 51% by 2030 and path to zero net emissions by 2050 – it is noted that the transport sector is committed to these targets.

The submission outlines the role of a Local Transport Plan (LTP) in ensuring that the impact of transport demand is central in informing future development, supports a shift to sustainable travel and sets a framework for investment in transport infrastructure. The NTA, as a key stakeholder in the process, notes and welcomes that a LTP has commenced through an Area Based Transport Assessment for the plan area.

Notes that the NTA is implementing BusConnects which will serve the LAP area. It is anticipated that certain routes will migrate to new roads once the GDRS is completed

ii. Overview of the TII Submission

The TII sets out its mission is to deliver transport infrastructure and services, which contribute to the quality of life for the people of Ireland and support the country's economic growth. The TII safeguards the strategic function of Luas and National Roads to promote the safe and efficient operation of both the light rail and national roads networks.

The TII welcomes that an ABTA will be prepared to inform the LAP and references the TII Traffic and Transport Assessment Guidelines (2014) and the Area Based Transport Assessment (ABTA) Guidance in this regard.

iii. Overview of the DoT Submission

The Department of Transport refers to policy with regard to accessible, integrated and sustainable public transport including reference to the following:

- The National Disability Inclusion Strategy (NDIS) 2017-2022 with regard to accessible infrastructure including dishing of footpaths and accessible bus stops.
- The United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) which obliges the State to ensure access for persons with a disability – including within the physical environment and transportation.

- The Design Manual for Urban Roads and Streets Interim advice note (2020) that included guidance on universal design, accessibility and consultation.
- the Connecting Ireland Rural Mobility Plan (2022-2025) which aims to increase public transport connectivity for people living outside of major cities and towns with an overall 25% increase of rural bus services.

iv. Recommendations arising from the NTA, TII and DoT Submissions

The land use and transportation assessment for the LAP must be evidence based and accord with the provisions of Spatial Planning and National Roads Guidelines for Planning Authorities (2012) and the Greater Dublin Area Transport Strategy 2022-2042. The NTA further recommends that the LAP aligns with all relevant policy documents as set out in Section 2.2 i. above.

The LAP should seek to relocate road space in appropriate locations in order to prioritise walking, cycling and public transport.

Additionally the LAP should be compatible with the strategic function of the national road network including the maintenance, improvement and protection of strategic transport corridors and the strategic function of the Trans-European Transport Network (TEN-T).

The LAP should support the objectives of the Greater Dublin Area Transport Strategy 2022-2042 including provisions in the plan to facilitate the following:

- Developments should be based on the avoid-shift-improve principle, the decide and provide approach to transport networks and the 10-minute town concept.
- A need to prioritise consolidation of development and reduction in demand for long distance travel.
- A need to maximise use of existing transport infrastructure and services.
- Development to be guided by sequential approach.
- The plan should not support new out-of-town retail development or support trip intensive development in peripheral locations.
- The plan should provide appropriate mix of uses at neighbourhood level.
- The street network in new developments should provide for filtered permeability to connect new and existing neighbourhoods.

- The plan should ensure that walking, cycling & public transport is a key determinant in the location of schools, retail and leisure.
- There is a need for detailed design for local services to maximise priority for pedestrians and cyclists.
- Where car parking is provided it should be located and designed to reduce hazards and visual dominance within the streetscape.
- Applications for schools or school expansion should only be supported where the road network can or is planned to facilitate safe walking and cycling access to school and school drop off areas should not be encouraged.

The LAP should be informed by and be prepared in parallel with a Local Transport Plan (LTP). The LTP is an iterative process, and its recommendations should be incorporated into the LAP as objectives. The LTP should be prepared using the Area Based Transport Assessment (ABTA) method and should:

- Be carried out having regard to relevant NTA and TII guidance and engage with the NTA and TII as key stakeholders in the process.
- Ensure that the position of KGLAP in the county settlement hierarchy is well understood and clear as this will set the context for the area with regard to the wider county and inform objectives in the LAP.
- Note the established centres in the vicinity of the LAP of Cherrywood, Sandyford and Carrickmines, with the proximity of The Park in Carrickmines and its demand for all day travel as a key consideration in the ABTA.
- Explore commuting patterns and help identify transport infrastructure needed in the area to meet travel demand.
- The LTP and ABTA should focus on identifying the required networks and measures to improve sustainable travel and identify weaknesses in the walking and cycling network and how these can be improved.
- Both the LTP and LAP should take account of revisions to the bus network including:
 - Route alignments
 - Stop locations
 - Terminus / bus layover facilities.
- Consider traffic management with an objective of ensuring that the movement of people by public transport, walking and cycling, and the movement of goods, is not adversely affected by private car traffic, and that the impacts of traffic congestion can be managed.

- Provides an analysis of car parking provision and includes objectives / measures to manage same including a review of:
 - On-street park with a view to its reallocation to other modes.
 - The use of parking charges to support modal shift / discourage all day commuter parking.
 - Access arrangements to car parks.
- Measures should complement the cycle network in the Greater Dublin Area Cycle Network Plan (2022) – noting that this was prepared on the basis of the existing road network – the GDDR will deliver new road links and junctions that will offer new cycling opportunities and shape how the existing roads will be used.
- Note national funding streams for improvements to the built environment for walking, cycling and other public realm improvements – these can be identified in the LTP.

Having regard to the Climate Action and Low Carbon Development (Amendment) Act 2021, the LAP should include objectives that:

- Reduce the demand for travel
- Increase use of public transport, walking and cycling
- Reduce car trips
- Promote conversion of transport to zero emission vehicles.

In addition to the above, the NTA, TII and DoT request that the following is taken into account in the preparation of the LAP:

- Development in the area should not undermine Cherrywood and Sandyford as employment destinations and locations of higher density residential development.
- Trip-intensive employment in the LAP area is unlikely to be appropriate as it would not be served by higher-capacity public transport services.
- Lands towards the south of the area are approximately 3.5km from the Luas, it is recommended that proposed densities align with public transport accessibility.
- Social inclusion and accessible public transport requires a whole journey approach, therefore there is a need to ensure universal design approach to the built environment including – paving, cycle paths, roads, pedestrian crossings, greenways and bus stops/shelters.
- The LAP should include objectives that promote universal design in the built environment will provide a safer and more attractive environment for all.
- The LAP should include sustainable transport indicators including for modal share to assist with monitoring.
- Any reference to the 2019 version of DMURS should be replaced with the 2020 2020 DMURS Interim Advice Note – Covid-19 Pandemic Response.

Chief Executive's Response and Recommendation

The Chief Executive notes and welcomes the submissions from the NTA, TII and DoT. The Planning Authority has commenced an ABTA/LTP that will inform the LAP. The Planning will continue to engage with the NTA and the TII in the preparation of the ABTA/LTP and will incorporate the recommendations of the LTP/ABTA insofar as practicably reasonable and appropriate to the LAP. In addition, the LAP will be prepared having regard to all relevant policy and guidance as set out in the submissions received from the NTA, TII and the DoT.

2.3 Submission / Observation from the Department of Education

The Department of Education (DoE) acknowledges the projected population increase within the plan area and if this is reached, have confirmed that additional schools will be required at primary and/or post-primary level with special education needs included for each. The submission refers to potential unforeseen additional impacts / pressures on school capacity such as the Ukrainian crisis.

The DoE welcomes inclusion of an 'ED' objective ('Proposed Education Site') in the County Development Plan 2022-2028 and within LAP area and will continue to engage with the council with regard to school provision for the Kiltiernan-Glenamuck area.

Chief Executive's Response and Recommendation

The Chief Executive notes and welcomes the submission from the DoE and will continue to work with the Department in the plan preparation process to ensure that the LAP sets out an appropriate policy framework for the provision of adequate education provisions to serve the area.

2.4 Submission / Observation from the Department of Housing, Local Government and Heritage

The submission received from the Department of Housing, Local Government and Heritage (DHLGH) provides commentary on:

- Archaeology
- Architectural Heritage, and
- Nature Heritage.

The overview of the submission is set out under each of these headings below.

i. Archaeology - Comments and Recommendations

The submission from DHLGH notes the rich archaeological heritage of the area and refers to a nearby Megalithic portal tomb (RMP No. 026-019) which is a recorded monument and in the ownership of the State.

The DHLGH notes the symbiotic relationship between cultural heritage and the biodiversity providing an opportunity to build capacity per the National Biodiversity Plan and references the Sustainable Development Goals (United Nations) and including the principle of 'leaving no one behind' and refers to goal no.11.

With regard to Archaeology, the DHLGH recommends the following:

- That the LAP cross references the CDP with regard to archaeology and archaeological heritage.
- That a definition of archaeology and archaeological heritage is set out in the LAP
- That an over-arching objective for the protection of the archaeological heritage is included and suggests a number of objectives be included in the plan that protect and enhance monuments and sites, enhance knowledge of and access to monuments and sites and that support community initiatives and projects.
- That appropriate development management objectives are set out in the LAP with regard to development that incorporates or is adjacent to monuments or sites.
- That the LAP seeks to retain the existing street layout, historic building lines, and traditional plot widths where these derive from medieval or other origins within towns or villages.
- That the LAP protects historic graveyards and manage/maintain where these are in the ownership of the Council.
- That historic landscapes or interest or significance are considered in the LAP.
- The inclusion of climate change policies and objectives for archaeological heritage including awareness, identifying areas at risk, vulnerability assessment, resilience and adaptation.
- That the LAP considers the integration of heritage with tourism and recreation.

In addition, the DHLG would welcome the inclusion of policies and objectives contained in:

- Heritage Ireland 2030
- Climate Change Sectoral Adaptation Plan for the Built and Archaeological Heritage (2019)
- Built Vernacular Strategy (2021)
- National Policy on Architecture (2022).

ii. Architectural Heritage - Comments and Recommendations

The DHLGH notes that architectural heritage is a key asset in meeting outcomes of national policy to achieve a circular economy for increased environmental, economic and social sustainability and resilience and should therefore be fully integrated into the Plan.

The DHLGH recommends that the LAP should:

- Include statutory architectural heritage designations and incorporate cross references to the County Development Plan.
- Reference all relevant guidance documents.
- Be fully accessible including in digital format and consider the use of open data.
- Ensure that policies & objectives align with land use objectives – a robust assessment to ensure cohesion is recommended.
- Ensure that the plan takes account of most up to date policy documents – Town Centre First is referenced.
- That a multi-disciplinary team co-ordinates policy approach for the plan.
- That Character Assessments are undertaken by suitably qualified persons, should include relevant plan / information to help inform the plan.
- That definitions of architectural heritage and architectural heritage related statutory designations are included in the LAP.

iii. Nature Conservation - Comments and Recommendations

The DHLGH welcomes reference in the issues paper to the inclusion of biodiversity related policies and objectives in the LAP. The submission notes that it may be logical and useful to group climate and natural heritage together when setting out policy objectives in the plan. It should be noted, however, that not all biodiversity issues are related to climate change.

The DHLGH states that much of the flora and fauna in the area is associated with the ridge of higher ground between the Glenamuck and Ballycorus Roads and welcomes reference in the issues paper to 'Corridor 6-Gateway Parks' in the Green Strategy for the County that corresponds to this area. In addition, the submission refers to the presence of Dingle Glen pNHA adjacent to the plan area and another smaller glaciofluvial channel running 500 m west of and parallel with Dingle Glen. These and other lands zoned objective 'G' – 'To protect and improve high amenity areas', in the Glenamuck area, as set out in the County Development Plan 2022-2028, are important areas for birds and mammals

The submission notes that badger and pine marten, two mammal species of conservation significance, have been recently reported as occurring in the area. Sika deer have also been report, but they are not of conservation importance, however they do need to be taken account of in road development. Bird species of conservation importance in the area include meadow pipit and skylark, and raven, jay and buzzard are also present. In addition, there are bat roosts in the area and their protection is established under Irish Law.

The Loughlinstown River, that flows through the LAP, is important for otters, trout, kingfisher, dipper and grey wagtail. The water quality of this river must therefore be maintained.

The DHLGH recommend that the LAP:

- Retains the high amenity land use zoning for the entire Glenamuck valley area.
- That the title given to the corresponding actions to combat anthropogenic climate change and the conservation of natural heritage should fully reflect

each topic such as: 'Climate Action and Natural Heritage Conservation' or 'Climate Action and Biodiversity Conservation'.

- The inclusion of an objective requiring that the design of all lighting within the LAP area, both external and internal, should seek to minimise light pollution and adverse effects on bat species.
- That lighting of greenways and footpaths in parks and other green spaces should be avoided if possible, or at least be made movement activated

between the hours of 8 PM and 6 AM to assist in retaining insect populations.

- That the riparian corridor along Glenamuck stream is protected in the LAP along with hedgerows that mark the route, having regard to the tree protection objectives at this location as set out in the County Development Plan.

Chief Executive's Response and Recommendation

The Chief Executive notes and welcomes the submissions from the Department of Housing, Local Government and Heritage. The Planning Authority will prepare the Draft LAP having regard to the comments and recommendations made in relation to Archaeology, Architectural Heritage and Nature Conservation. In this regard I should be noted that a Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) will be carried out and will inform the plan making process.

2.5 Submission / Observation from the Department of Environment, Climate & Communications, incorporating the Geological Survey of Ireland

The submission from the Department of Environment, Climate & Communications (DECC) incorporates a submission from Geological Survey of Ireland (GSI). An overview of each submission together with their recommendations for the LAP are set out below.

i. Overview of DECC Submission

The submission sets out the vision and ambition of the DECC from a low carbon to a climate neutral Ireland noting that Local Authorities should build resilience in communities to overcome climate adaptation challenges and maximise mitigation and adaptation opportunities and facilitating a circular economy.

Local Authority functions are required to be consistent with climate action plan, strategy, adaptation framework & sectoral plans. In this regard, the submission refers to the Climate Action Plan, 2023, roadmap for reducing emissions towards net-zero by 2050. The LAP is required to have regard to the Climate Action Plan.

The DECC recommends that the LAP:

- Is aligned with the Departments Statement of Strategy for 2021-2023 with regard to Climate Action, Transport, Renewable Energy, Retrofitting, Heat & District Heating, Circular economy, Geoscience policy and Telecommunications.
- Consider how the actions in Climate Action Plan (CAP) can be integrated into the LAP.
- Has regard to the Long-term Strategy on Greenhouse Gass Emissions Reductions.
- Consult with their Climate Action Regional Office (CARO) in all climate action related matters.
- Consider measures with regard to transport and reducing demand for same noting support in the CAP for sustainable transport and active travel.
- The inclusion of objectives to promote renewable energy installations in the LAP and support additional supporting grid infrastructure.
- Consider neutral carbon / energy use in new developments
- Explore how Nearly zero-emission building (NZEB) could be implemented at the local level by prioritising retrofitting of existing buildings.

- Consider how the plan could contribute to the reduction of a reliance on fossil fuels.
- Regard should be given to compact growth and its potential to facilitate low carbon district heating.
- Consider how it can support the Circular Economy.
- Integrate new guidance with regard to construction waste management.
- Supports digital connectivity and high quality communications infrastructure.

ii. Overview of GSI Submission

The GSI submission refers to a number of datasets available for use in Environmental Impact Assessment Reports (EIAR) and Strategic Environmental Assessment (SEA). The data can be used as a baseline for further site specific assessments. The datasets are available www.gsi.ie where a mapviewer provides data on geology, groundwater, geoheritage (County Geological Sites), geo hazards e.g. landslides, mineral and soils.

GSI recommends the use of their various data sets in the Strategic Environmental Assessment (SEA) to add robustness to the process.

It is noted in the submission that the Groundwater Vulnerability map indicates the range of groundwater vulnerabilities within the area covered is variable. Proposed developments need to consider any potential impact on specific groundwater abstractions and on groundwater resources in general, as such, it is recommended that the Groundwater Viewer is used to identify areas of High to Extreme Vulnerability and 'Rock at or near surface' in assessments as any groundwater-surface water interactions that might occur would be greatest in these areas.

The submission refers to 'GWClimate', a groundwater monitoring and modelling project that aims to investigate the impact of climate change on groundwater which may be useful in flood risk management plans. It is further noted that groundwater protection schemes are now mapped.

GSI recommends that geohazards e.g. landslides, are taken into consideration, when developing areas where these risks are prevalent. GSI further recommends that natural resources used in any proposed developments within the LAP are sustainably sourced from properly recognised and licensed facilities, and that consideration of future resource sterilization is considered.

Chief Executive's Response and Recommendation

The Chief Executive notes and welcomes the submissions from the Department of Environment, Climate & Communications and Geological Survey Ireland. The Planning Authority will prepare the Draft LAP having regard to the comments and recommendations made with regard to climate action and adaptation and will use the recommended datasets in the preparation of the Strategic Environmental Assessment (SEA).

2.6 Submission / Observation from the Health Service Executive – Environmental Health Office

The submission from the Environmental Health Office (EHO) of the Health Service Executive (HSE) is supportive of a LAP that promotes population health and fits the vision of the Healthy Ireland Framework “*where everyone can enjoy physical and mental health wellbeing to their full potential, where wellbeing is valued and supported at every level of society and is everyone’s responsibility.*”

The EHO recommends that the LAP should:

- Support climate action and low carbon development.
- Develop a low carbon, climate-resilient, and environmentally sustainable Kiltiernan/Glenamuck by 2050.
- Support the Sustainable Development Goals as set out in Agenda 2030 – specifically SDG3 (healthy lives) and SDG11 (sustainable cities and communities) and align with the National Implementation Plan for the Sustainable Development Goals 2022 – 2024.
- Adopt 4 priorities of the Sendai Framework for Disaster Risk Reduction 2015 – 2030.
- Be as inclusive as possible taking account of:
 - Older persons
 - People with a disability
 - Youth/adolescents
 - Disadvantaged/marginalised groups

- Ethnicity/cultural mix
- All genders.
- Enable/support all age groups to participate in active play/sport and active travel.
- Prioritise transport options that place pedestrians first and private vehicles at the bottom of a hierarchy.
- Consider physical separation of pedestrian and cycle paths to ensure safety for all, ensuring that secure bicycle parking is provided, and that active travel and road safety takes e-scooters into account.
- Prioritize rights of way.
- Deliver high air quality and identify areas of poor air quality together with mitigation measures.
- Support renewable energy, including the storage of energy.
- Include a noise map and apply thresholds.
- Protect quality of existing and planned water bodies.
- Align with the Circular Economy and Miscellaneous Provisions Act of July 2022 and work towards a circular economy.
- Support waste reduction and segregation.
- Support sustainable diets of residents.
- Assist in the delivery of a tobacco free Ireland.

Chief Executive's Response and Recommendation

The Chief Executive notes and welcomes the submissions from the HSE Environmental Health Office. The Planning Authority will prepare the Draft LAP having regard to the comments and recommendations as appropriate and reasonably practicable. It is envisaged that the LAP will provide for the development of a healthy, low carbon and climate resilient area.

2.7 Submissions / Observations from the Office of Public Works and Uisce Éireann

i. Office of Public Works – Comments and Recommendations

The submission from the Office of Public Works (OPW) largely deals with flood risk management and includes the following recommendations for the LAP:

- Reference should be made to Guidelines on the Planning System and Flood Risk Management (DHPLG/OPW, Nov 2009) to ensure that the key principles of flood risk management and sustainable planning are adopted.
- A precautionary approach should be taken with more detailed assessments carried out before any decisions are made.
- Refers to the 3 stages of the flood risk assessment process for planning authorities and recommends that the draft plan pays attention to the following sections of the guidelines:
 - Chapter 3 – The Planning Principles,
 - Chapter 3 – The Sequential Approach, and definitions of Appropriate Development,
 - Chapters 3 and 4 – The Plan-making Justification Test where it is intended to zone or otherwise designate land where there is a moderate or high probability of flooding, noting that the application of the Test should be supported by analysis to an appropriate level of detail.
- Requests that clear commitments to flood risk and the principles in the guidelines are included in the draft plan with expert input (internally) provided.
- Demonstrates that the sequential approach has been applied and include legible flood mapping over land use zoning.
- Notes that a justification test would not be applicable to the periphery of urban areas. A justification test must demonstrate that flood risk can be managed, and the use of land will not cause impacts elsewhere.
- Should have regard to the CFRAM flood maps, however, notes that physical changes have occurred since CFRAM maps were produced and there is an ongoing review of mapping. In this regard, national indicative flood mapping may not be locally accurate.

- Is required to incorporate a flood risk assessment to define fluvial flood zones for areas with a catchment of less than 5km².
- Zoning should only permit for appropriate uses along embankments to protect agricultural lands from flooding.
- Should take account of impacts elsewhere including impact of additional runoff / increased hard surfaces etc.
- Should identify opportunities for nature-based solutions to reduce runoff and improve biodiversity.

ii. Uisce Éireann – Comments and Recommendations

The submission from Uisce Éireann (UE) refers to a number of policy documents with regard to the sustainable management of water supply and wastewater including the Regional Spatial and Economic Strategy (RSES) for general policy direction and the Regional Water Resources Plan (RWRP) for the East & Midlands Region. If all projects in the RWRP are delivered it is envisaged that:

- Water quality & quantity will improve.
- A more resilient & interconnected supply would transform an existing fragmented system.
- Growth & economic development would be supported.

The submission notes the adoption of the WHO Water Safety Plan approach through Drinking Water Safety Plans (DWSPs) to protect human health. It is noted that the impacts of climate change are taken into account in UE plans and projects. A strategy in response to climate change is being prepared.

UE is happy to work with Local Authorities to ensure that overarching goals of mitigating and adapting to climate change with regard to water and wastewater can be achieved and to safeguard drinking water sources. In addition, UE is happy to collaborate on projects that would remove stormwater from combined sewers.

UE supports the River Basin Management Plan (RBMP) Implementation Strategy through participation within the RBMP implementation structures and

participation in Water Framework Directive initial and further characterisation activities. In addition, UE supports the LA Waters Programme (LAWPRO) desktop studies and local catchment assessment work through ongoing data sharing.

The submission notes that plan area forms part of the Greater Dublin Area Water Resource Zone and is serviced via the Vartry Water Supply; this is constrained, however, there should be sufficient capacity to support the projected population. It is important to note that capacity does, however, change regularly and in this regard any new development should contact the connections team for up to date detail in relation to water supply.

There is currently sufficient headroom at the Bray / Shanganagh WWT Plant to cater for the LAP area, there are however some constraints in the sewer network. A project is progressing with the Infrastructure Delivery Department in consultation with DLR and individual sites will need to get to this new trunk sewer. Localised network upgrades may also be required particularly in areas served by 150mm diameter sewers or watermains with a diameter of 80mm or less.

UE requests early engagement on public realm projects that may have potential impacts on UE assets.

UE makes the following recommendations for the LAP:

- Should include SuDS and Green-Blue infrastructure policies and objectives in new developments, public realm, and retrofitted into existing developed areas.
- Encourage the removal of stormwater from combined systems as part of a project, it is noted that the discharge of additional surface water into a combined system is not permitted.
- Should include objectives to promote SUDs and in particular promotion of Nature based SUDs (NbsUDs).
- Encourages sequential development in areas with existing water services infrastructure and spare capacity.
- An overall development masterplan including phases of development and timelines is preferred in order that an overall strategic water services plan for the lands can be developed.
- In instances where new development is proposed to be served via private property, third-party agreements would be required.
- In the event that a site is not served by mains, the feasibility of extending the public network may be required via a pre-connections enquiry.

Chief Executive's Response and Recommendation

The Chief Executive notes and welcomes the submissions from the OPW and Uisce Éireann. The Planning will carry out a Strategic Floor Risk Assessment for the LAP which will inform policies and objectives. In addition, the LAP will have regard to the recommendations of both the OPW and UE. The Planning Authority will continue to engage with the OPW and UE through the plan making process.

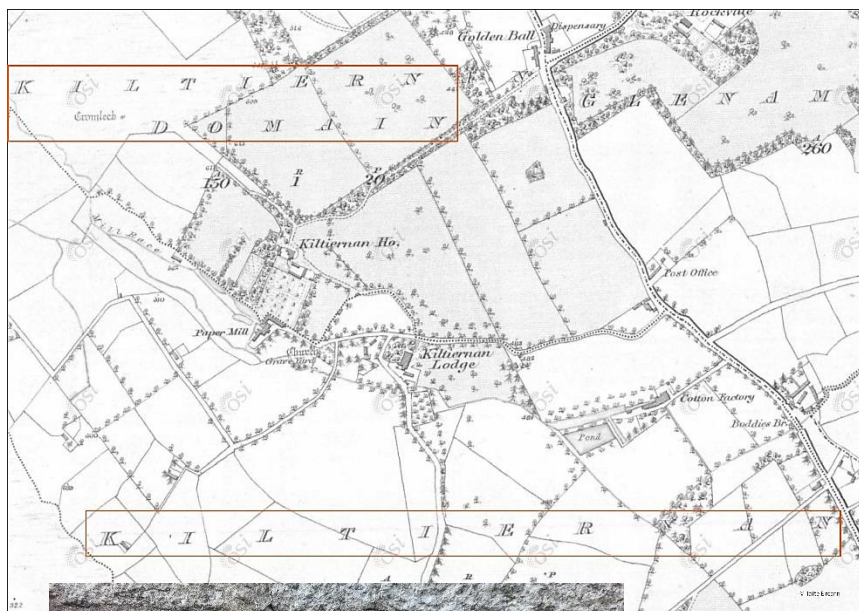
2.8 Submission / Observation from the Dublin Airport Authority

A submission was received from the Dublin Airport Authority (DAA), however no specific comments were made with regard to the LAP.

3. Overview of Issues Raised by Other Persons

3.1 ‘Kiltiernan’ or ‘Kiltiernan’?

A number of submissions raised the issue of the Council’s spelling of Kiltiernan. Locally, the ‘i’ has been dropped from the spelling and submissions are seeking that the spelling of Kiltiernan reflects the local spelling.



Above: First Edition 6inch map Tailte Éireann (OSI) 1829-1840



Left: Kiltiernan Bridge, name plaque, constructed c.1852

Chief Executive’s Response and Recommendation

As set out at the start of the 2013 LAP, the spelling of ‘Kiltiernan’ has varied over the years from as early as the 17th Century, with references from various periods alternating between the spellings.

In the Ordnance Survey (OS) Field Name Books, a number of variations are listed. Older versions of the place name in approximate chronological order from the 17th Century include: Kiltyernan, Killtjernan Parish, Kiltturnan and Ballibetagh, Killturnan and Ballybetagh and Killtjernann.

The researchers of the Ordnance Survey (now Tailte Éireann) place name division recorded these versions of the name in use in the early 19th Century: Cill Tigearnain, Kieltiernan, Kiltiernan and Kiltiernan.

A historical map of the area is set out opposite illustrating the ‘Kiltiernan Domain’ and ‘Kiltiernan’ placenames (outlined for ease of reference) on Tailte Éireann (OSI) maps from the first edition of the 6inch map, 1829-1841. Contemporary mapping from Tailte Éireann retains this placement spelling. In addition is a recent photo of the ‘Kiltiernan Bridge’.

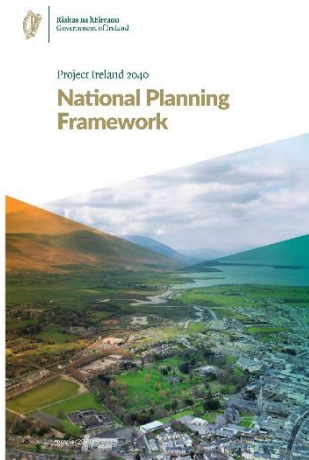
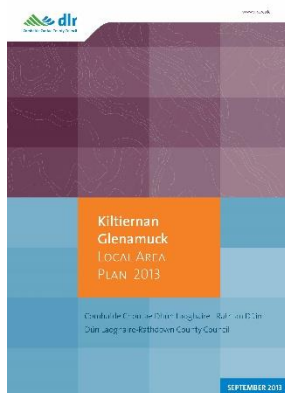
It is intended to retain ‘Kiltiernan’ for the LAP having regard to its historical placename.

3.2 Objectives of the Previous Plan

Some submissions have requested that many of the provisions of the previous Kiltiernan-Glenamuck Local Area Plan, 2013, remain relevant, don’t require significant change and should be retained in the new LAP for the area to ensure that development is provided in an appropriate manner.

Concerns were raised, however, over number of material contraventions to previous LAP resulting in a higher quantum of development than the area can sustain. It has been requested that measures are put in place to avoid material contraventions to the new LAP.

Other submissions received have stated that some of the provisions in the previous LAP were overly prescriptive and acted to stymie development, specifically with regard to rigid phasing predicated on the delivery of the Glenamuck Distributor Roads Scheme (GDRS) and limitation on density and building heights (these specific matters will be discussed further in subsequent sections of this report).



Chief Executive’s Response and Recommendation

The Kiltiernan-Glenamuck LAP, 2013 was extended for a further 5 years in 2018 up to 2023 and has now expired. There is no provision in the Planning and development Act, 2000 (as amended) (the Act) to further extend the 2013 LAP.

Since the adoption and extension of the 2013 LAP, there have been significant changes to strategic planning policy and legislation with the adoption of the National Planning Framework (NPF) in 2018 and provisions made in the Act for same, the adoption of the Eastern and Midlands Regional Spatial and Economic Strategy (RSES) in 2019 and the dlr County Development Plan 2022-2028. In addition, there have been a number of new Section 28 Ministerial Guidelines published in relation to the delivery of housing that are not accounted for in the previous LAP, the most recent of which being the Sustainable Residential Development and Compact Settlements Guidelines 2024. It is noted that the NPF is currently under review.

It is also noted that the area has undergone significant change since the first publication of the 2013 LAP. Recent, Census 2022 data together with planning and construction activity will be used to assist with the preparation of the new plan.

The new LAP for Kiltiernan-Glenamuck will be prepared having regard to all relevant, current, planning policy and guidance. In addition, a number of background studies and assessments will be carried out to inform the new LAP, as recommended by the OPR in Section 2 of this report. The previous LAP will be reviewed to ascertain if there are provisions that could potentially be brought forward into the new plan for the area.

3.3 Local Facilities & Services

The lack of facilities and services within the plan area was raised in a significant number of submissions received (c.40%) from both prescribed bodies and the public, the majority of whom reside within the plan area.

Numerous submissions noted that a significant quantum of housing has been permitted without any complementary amenities to serve the residents of the area, including the neighbourhood centre / village centre set out in the 2013 LAP. The only local shop within the plan area is that associated with the Circle K service station. Submissions highlight that residents dependent on their private car to visit retail shops and other services located beyond the plan area, none of which are within walking distance.

The provision of following facilities have been requested to be located within a reasonable walking and/or cycle distance residential schemes to serve both existing and future residents of the area:

- A clearly defined and centrally located village centre.
- A supermarket.
- Local shops and services including a small shop, post office and hairdresser.
- Café and family friendly restaurant use.
- Healthcare facilities including a doctor surgery, a dentist and pharmacy.
- Local childcare facilities.
- A gym.
- A public house.



Above: Kiltiernan Church of Ireland & Kiltiernan Parish Centre

- Additional community facilities including a library and community centre, one submission included a community vision and model to illustrate how it might be achieved.

The majority of submissions raising the issue of facilities requested that these should be provided before any further housing developments are permitted. It was noted that a neighbourhood centre was proposed within a recent planning application, however, this was considered significantly fall short of what is needed to serve the area and that any future proposed neighbourhood centre should be at least 50% larger than that previously proposed.

It was also noted in submission, that new developments should incorporate the 10-minute neighbourhood concept to allow existing and future residents to walk or cycle to facilities, reducing the need to use private cars. Additionally, it was requested that a new neighborhood centre, shops and facilities would be well designed and laid out in a manner that provides a proper streetscape in the area.

Contrary those seeking facilities and services, one submission received suggested that there was sufficient social, community and childcare provision in the area.

Chief Executive's Response and Recommendation

The issues raised in relation to the provision of appropriate facilities to serve the area are noted and will be taken into consideration in the preparation of the Draft LAP.

It is acknowledged that the neighbourhood centre set out in the urban framework plan of the 2013 LAP was not delivered within the lifetime of the previous LAP. It is intended that the Lap will include objectives for a suitably scaled neighbourhood centre. It is acknowledged that provision of a neighbourhood Centre will be developer led.

An audit of all existing Sustainable Neighbourhood Infrastructure (SNI), neighbourhood centre uses and childcare will be carried out and used to inform the preparation of the new LAP and to identify a range of appropriate facilities required to serve the plan area. Additionally, it is envisaged that a framework plan for a neighbourhood centre would be incorporated into the new LAP setting out key design and layout criteria.

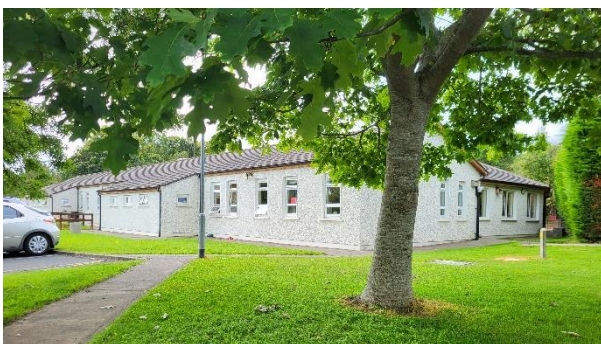
3.4 School Provision

A significant number of submissions (c.44%), largely from local residents, and the Department of Education, have raised concerns with regard to the capacity of existing primary schools together with the lack of a local secondary school.

Numerous submissions were received from concerned parents with pre-school aged children, and indeed families that have recently moved to the area, have been advised that existing local primary schools may not be in a position to offer their child a place. In addition to primary schools, a number of submissions have raised concern over the lack of any local secondary school for current primary level pupils to move on to. While it is noted that there are schools outside of the plan area, submissions received have cited a preference for additional schools to be located within the plan area. The ethos of schools was also raised in a number of submissions.

In addition to requests for additional schools, many of the submissions received refer to the poor accessibility of the two schools within the plan area. There are poor linkages between residential developments and the existing schools with no safe crossing points for children, unsafe footpaths and no cycle tracks that would allow pupils to safely walk or cycle to school.

Contrary to those raising concerns in relation to schools, one submission received suggested that there was adequate school provision in the area, referring to the existing primary schools within the plan area, the national school at Bellarmine and the new Stepside Educate together secondary school.



Left: Kiltiernan Church of Ireland National School

Chief Executive's Response and Recommendation

The issues raised in relation to school provision within the plan area are noted and will be taken in consideration in the preparation of the Draft LAP. It is acknowledged that there are currently 2 primary schools within the plan area: Our Lady of the Wayside National School, and Kiltiernan Church of Ireland National School.

Map 9 of the County Development Plan 2022-2028 includes an 'Education' objective for the plan area, on lands along Glenamuck Road. In addition, Chapter 4 of the County Development Plan states that "while 1 objective is identified on map 9, that the Department of Education have recognized that there may be a need for another school in the Kiltiernan-Glenamuck area".

In their submission to this pre-draft consultation, and outline above in Section 2.3 above, the Department of Education has reiterated the need for additional schools in the area.

The planning authority have and will continue to engage with the Department of Education in relation to school provision for the plan area.

In addition, an Area Based Transport Assessment (ABTA) is being carried out which will inform the new LAP with regards to measures to assist in the delivery of more sustainable forms of movement to and through the area. It is envisaged that this ABTA would identify new and improved walking and cycling routes and would incorporate Safe Routes to School.

3.5 Housing Policy and Development Framework

Under this section, an overview of the issues raised in relation to the development of the area will be set out under a number of sub-headings with an overall response and recommendation at the end. Issues that set out cross thematic concerns, such as development impacts on trees or biodiversity, may be dealt with under a separate section, where this arises, a footnote will be added to same.

i. Planning Policy

In addition to submissions received from prescribed bodies, as set out in section 2 above, a number of submissions from other persons referred to overarching planning policy and guidance that the new LAP is required to align with and/or have regard to. Among the policy and guidance documents referenced are:

- National Planning Framework (NPF), including the review of same.
- Regional Spatial and Economic Strategy (RSES)
- County Development Plan 2022-2028
- Design Standards for New Apartments
- Planning System and Flood Risk Management
- Urban Development and Building Height Guidelines
- The Draft Sustainable Residential Development and Compact Settlements Guidelines.

In addition to the overarching policy framework, a number of submissions also made reference to the publication of Census 2022 data noting that the issues paper and County Development Plan include data from census 2016. A number of submissions refer to a significant population increase in the area and that the new plan should have regard to the most up to date demographics for the area.

A small number of submissions made reference to the review of the NPF having regard to Census 2022 and requested that the Draft LAP should not be published until the NPF review is completed in order that the new plan can align with same.

¹ Trees and hedgerows are dealt with Section 3.8

ii. Local Character & Streetscape

Submissions received raised concerns in relation to erosion of the character of the area. Submissions consider the Kiltiernan-Glenamuck area to be a rural village at the foot of the Dublin mountains with established tree lines, hedgerows¹ and 1-2 storey dwellings with views and vistas to the surrounding hills. Other submissions consider the area to be suburban in nature.

Submissions state that new developments have failed to respect the character and context of Kiltiernan-Glenamuck and have not provided high quality buildings, open space, planting, or public realm. Submissions request that the new LAP seeks to retain and protect the character of the area.

Many submissions consider that apartment development is not appropriate in the area and that housing only should be permitted. In addition, a submission requested that provision was made in the LAP for locals to build their own houses.

Submissions additional request that the new LAP provides for the delivery of a high quality public realm that incorporates an appropriate streetscape and the village green set out in the 2013 LAP in order to provide a focal point for the village.

iii. Density

Submissions received have raised varying views on residential density with many considering that densities of recently delivered or permitted residential schemes being excessive and representing overdevelopment of the area. Submissions have noted that a number of recent schemes have exceeded the density range set out in the 2013 LAP. In this regard, submissions are requesting that the new LAP sets parameters for low to medium density housing.

Contrary to the above, a number of submissions note the proximity of the plan area to the proposed Metrolink / Luas green line and the provisions of the Draft

Sustainable Residential Development and Compact Settlements Guidelines which allow for higher densities closer to public transport corridor. Reference is also made to the NPF and RSES requirements to deliver compact growth within the Dublin City and Suburbs area. It is also stated that density parameters in the 2013 LAP were overly prescriptive, which should be avoided in the new LAP.

One submission has requested that a maximum density should not be applied in the new LAP, rather, a more flexible approach to density should be facilitated. In addition, density should not only relate to the existing context but also the evolving context and a design led approach to site frameworks should be employed to optimise density and provide appropriate development.

Submissions that favour medium to higher densities suggest that this be achieved having regard to qualitative assessments including daylight/sunlight assessments and that the amenities of adjoining properties must be taken into account.

With regard to density parameters, submissions consider that the plan area sits within the 40-80 dwelling per hectare (dph) criteria allowing up to 150 dph in accessible areas as set out in the then Draft Compact Settlement Guidelines. Submissions request that the new LAP provides clarity with regard to the application of density parameters across the area.

iv. Height, Design and Layout

A number of submissions have raised concerns in relation to the design, layout and overall quality of some of the recent developments within the plan area. Issues include:

- The size of units being permitted,
- proximity of new buildings to the road,
- orientation of private open space / balconies,
- The appropriateness of apartments in the area,
- impacts on adjoining properties in terms of overshadowing, overlooking and visual dominance,

² Open space and recreation is dealt within under Section 3.8 below.

- Use of materials / finishes (e.g. not using local stone finishes),
- Under provision of open space loss of existing planting, and no provision of play facilities²,
- Inappropriate building heights having regard to the topography of the area and the limits applied in the 2013 LAP.

Submissions have requested that these issues are taken into consideration in the drafting of the new LAP with limits placed on height and that particular attention is given to National Planning Objective 4 in the NPF that states: *“Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.”*

A design strategy for the LAP has also been requested that clearly sets out design parameters for new developments. A number of submissions have also requested that deviations from already permitted schemes are not allowed in the form of amending applications, particularly where an increase in density and height is proposed.

Below: Dwellings in Suttons Field



As with issues raised in relation to density above, there were a number of contrasting submissions that requested a more flexible approach is taken with regard to building height. In particular, taller landmark buildings should be facilitated in certain locations, such as at new road junctions together, with a variation in building heights along roads in a similar manner to the pattern of development along the N11. Reference to Specific Planning Policy Requirement (SPPR) 1 in the Urban Development and Building Height Guidelines which accommodates additional height in appropriate locations.

v. Housing Type and Mix

Submissions raised concerns with the dominance of apartment developments being delivered in the area, noting that family units would be better suited in the area. A number of submissions also raised the issue of housing for all, including housing units suitable for families and for older people in the area.

Concerns were also raised around the affordability of units in the area and that the area was not suited to 'build to rent' type of accommodation, particularly where there is a difference in standards applied between such units and those built to sell.

A request has been made that the new LAP includes an objective to support delivery of social and affordable housing and that cost rental housing is recognized and supported.

Chief Executive's Response and Recommendation

The issues and recommendations with regard to housing delivery, as set out above, are noted and will be taken into consideration in the preparation of the draft LAP. It is acknowledged that the area has changed considerably since the adoption of the previous 2013 LAP. In addition, there has been significant change to planning policy in the intervening period as set out in Section 3.1 above.

The Draft LAP will be prepared having regard to the provisions of the dlr County Development Plan 2022-2028 which aligns with the National Planning Framework (NPF) and the Eastern and Midlands Regional Spatial and Economic Strategy (RSES). The development plan incorporates SPPRs contained within all Section 28 Ministerial Guidelines which were in force prior to its adoption, including Design Standards for New Apartments (2020) and the Urban Development and Building Height Guidelines (2018).

The County Development Plan 2022-2028 contains a suite of policy objectives and development management guidance in relation to the delivery of sustainable residential development including provisions for healthy placemaking, high quality design, density, building height, unit mix, apartment size, housing for all and social and affordable housing. The new LAP will incorporate all relevant policy objectives, as required, of the County Development Plan.

The Apartment Guidelines were amended in 2022, removing SPPRs in relation to build to rent. The recently published Sustainable Residential Development and Compact Settlements Guidelines 2024 sets out criteria for density together with new SPPRs for residential development. The NPF is also currently under review. These amended / new guidelines and any amendment to the NPF will be taken into consideration, and complied with where required, in the preparation of the new LAP.

The LAP will also be informed by Census 2022 data together with planning and construction activity information which will be used to assist with the preparation of the new plan. Additionally, a number of background studies and assessments will be carried out to inform the new LAP, as recommended by the OPR in Section 2 of this report. In this regard, development frameworks setting out a series of design principles for the area may be incorporated into the Draft LAP.

3.6 Climate Action

In addition to climate change / climate action raised by prescribed bodies as set out in section 2 above, a small number of submissions by other persons directly raised the issue of climate change. The key issues around this topic centred on the use and promotion of renewable energy and charging provisions for electric vehicles. One submission raised a concern around the climate impacts of longer car journeys resulting from the approved bus gate on Glenamuck Road and other submissions referenced natural assets as climate mitigation measures, with one submission referring to existing trees and hedgerows acting as carbon sinks.

One submission noted the need for modal shift in order to reduce transport related emissions by 20% as set out in the Climate Action Plan and another submission inferred that an improved public transport system would improve the local environment. Whilst not directly referring to climate action, numerous submissions requested that appropriate walking and cycling infrastructure is provided to reduce a dependence on private car use for local trips.

Chief Executive's Response and Recommendation

Issues and commentary received with regard to climate action will be taken into account in the preparation of the Draft LAP.

Since the pre-draft public consultation period, the Council have adopted their new Climate Action Plan 2024-2029 which will inform the new LAP in addition to the suite of policy objectives on climate action set out in the County Development Plan 2022-2028.

3.7 Transport & Movement

Approximately 84% of submissions raised issues in relation to transport and movement with many submissions referring to more than one transport related matter. An overview of the issues raised are set out under a number of sub-headings below and an overall response and recommendation will be provided at the end of this section.

In general, a significant number of submissions referred to the issue of increased traffic levels and congestion in the area and that residents in the area depend on their private car for movement, both within the area and to and from the area for commuting to work, school drop off/collection, shopping and recreation. Some of the reasons for this have already been set out above under Section 3.2 and further reasons are set out below.

i. Active Tavel

A significant number of submissions raised issues around the walking and cycling infrastructure in the area, specifically with regard to a lack thereof. Numerous submissions referred to unsafe and poor quality footpaths, particularly along Glenamuck Road. Many submissions cited that they would like to be able to let their children walk or cycle to school, however, the current roads and footpath network coupled with heavy traffic volumes renders this unsafe. Additionally, there are limited safe crossing points along existing roads, particularly around local primary schools and new residential developments.

There is poor walking and cycling connectivity from Kiltiernan-Glenamuck to the Luas and for those who cycle, there are no proper, secure cycle parking facilities at the closest Luas stop.

In addition to road safety concerns, a number of submissions referred to a lack of recreational walking routes both within the plan area and to areas adjacent to the plan area, such as Ticknick Park in Cherrywood, the lead mines chimney and the Dublin mountains etc.

Many submissions note that there is no off road walking or cycle route serving the two primary schools in the area, however, there may be an opportunity behind Farmer Browns to provide an off road connection between each of the schools with connections into residential developments.

With regard to active travel measures, the submissions received request the new LAP makes provision for:

- Wider footpaths,
- Segregated cycle tracks,
- Secure cycle parking facilities,
- Of road 'greenway' walking and cycling routes,
- Improved connections within the plan area between existing and emerging residential areas and local schools,
- Additional pedestrian crossing points,
- Recreational walking routes with linkages to adjoining areas.
- Provision of cycle routes between Lambs Cross and Stepside.



Left: Enniskerry Road

ii. Public Transport

Numerous submissions raise the issue of poor public transport infrastructure serving the plan area with only low frequency bus services running through Kiltiernan-Glenamuck. Submission note that the Luas green line lies to the east of the plan area, however, there is no frequent bus route that connects the plan

area with the Luas and it takes approximately 40 minutes to walk to the closest stop from Enniskerry Road.

The lack of public transport infrastructure serving the area is cited as one of the reasons for car dependence within the plan area, coupled with a lack of facilities and walking or cycling infrastructure. It is also noted that there is limited or no public transport links to secondary schools located outside the area.

In addition to poor public transport serving the area, a number of submissions raised the issue of poor bus stops including limited provision of bus shelter and lack of space on footpaths to wait for buses.

Contrary to submissions raising concerns in relation to public transport, a small number of submissions refer to the plan area as being proximate to the Luas and being well served by routes 44 and 118.

With regard to public transport provision, submission request the new LAP provides for:

- Improved bus infrastructure and frequencies serving the area,
- A frequent bus link to/from the Luas,

iii. Car Parking

A small number of submissions raise concerns over a limited quantum of car parking being provided within new residential developments and at commercial facilities in adjoining areas. As the area is not yet properly served by public transport, submissions requests that appropriate levels of car parking is provided for within residential developments.

One submission, whilst in favour of reducing car parking and moving towards more sustainable forms of transport, does note that there will continue to be a need for car storage. Additionally, the parking and charging of electric vehicles and electric bikes and scooters should be considered in the plan. It is requested that objectives are included in the new LAP with regard to a reduction in car parking to assist with modal change to more sustainable forms of transportation.

iv. Road Infrastructure

Numerous submissions received raised concerns around the quality and safety of the existing road network, in particular the Glenamuck Road. Issues raised centered around the capacity of the existing roads to accommodate increases in traffic in the area and the safety of junctions serving new residential developments with specific reference to Suttons Field and Bishops Gate. The speed of traffic along roads has also been raised in terms of road safety issues.

The width of the Glenamuck Road, particularly at a tight corner close to its junction with Enniskerry Road raised a number of concerns. Many submissions noted that there had been damage to passing vehicles at this location and there is significant concern around pedestrian safety at this location due to vehicles having to mount the kerb to avoid oncoming traffic. The poor condition of Glenamuck Road was also raised as an issue together with the height of the existing speed humps which are causing damage to cars.

In addition, a number of submissions raised concern around the safety of roads immediately adjoining schools, particularly around drop off / pick up times.

A large number of submissions noted that construction related traffic and traffic management associated with construction works has exacerbated traffic related issues in the area through increased congestion and greater hazards on the existing, narrow, road network. Heavy vehicle movements, together with increased traffic in the area have impacted on the quality of existing roads and have left a number of potholes to navigate in the area. A number of submissions raised concerns around traffic management systems employed for construction projects both in the area and at Lambs Cross. Submissions raise concerns that the systems in place are not being properly managed, are not safe and create more congestion on local roads, particularly at school drop off/collection times. There is a concern that similar systems would be put in place for future development and road schemes adding to issues on local roads.

Many submissions refer to the approved Glenamuck Distributor Road Scheme (GDRS) positively, noting that this will remove much of the traffic from the current road network and will improve connectivity to surrounding areas. These submissions look forward to the implementation and completion of the GDRS.

There are, however, a small number of submission that raise concerns about the new roads, in particular the provision of a bus gate along Glenamuck road. The submissions received on this matter consider that the bus gate would sever links with facilities in Kiltiernan, such as the schools and churches, and would segregate the local community. One submission notes commentary on this matter in the An Bord Pleanála Inspectors report. Submissions also raise concerns around increased emissions owing to longer drive times into Kiltiernan. Concerns were also raised around the future capacity of the new roads to serve the growing population of the area, particularly in relation to the Glenamuck Local Distributor Road. Submissions also query the provision of bus and cycle lanes on the approved GDRS. Concerns were also raised with regard to the new GDRS impacting upon flooding in the area. Other issues were raised around the impact of the GDRS on future development in the area, including the phasing of future development relevant to³.

A number of requests have been made with regard to provisions in the new LAP around the existing and future road network, including:

- Traffic calming measures installed on existing roads in advance of the GDRS, particularly around schools, including Safe Routes to Schools provision.
- Improvements to access to/from residential developments including the provision of signalized junctions to improve safety.
- Urgent widening of the Glenamuck Road.
- Repair of existing roads to improve quality, this should include a revision to existing speed humps on Glenamuck Road.
- Progress works on the GDRS and provide timelines for its delivery.
- Removal of the bus gate as part of the GDRS.
- Review the approved GDRS with a view to incorporating bus and cycle lanes.

³ Issues in relation to phasing is set out in Section 3.12 of the report.

- Ensure that there is sufficient capacity on the GDRS to accommodate projected growth in the area.
- Investigate the potential for Enniskerry Road through the village to become one-way for cars and 2-way for cyclists.
- Implement and manage proper traffic management systems for all construction works in the area. Special consideration should be given to busier times of the day, including around school drop off and collection times.

Chief Executive's Response and Recommendation

The issues raised around transport and movement have been noted and will be taken into consideration in the preparation of the Draft LAP. The submission received from the NTA, TII and DoT, as set out in Section 2.2 above sets out a number of criteria to be taken in account in the preparation of both a Local Transport Plan (LTP), informed by an Area Based Transport Assessment (ABTA) and the Draft LAP.

The Planning Authority has commenced an ABTA/LTP for the plan area that will inform the Draft LAP with regards to measures to assist in the delivery of more sustainable forms of movement to and through the area. It is envisaged that this ABTA would identify new and improved walking and cycling routes incorporating Safe Routes to School. The Planning Authority will continue to engage with the NTA and the TII in the preparation of the ABTA/LTP and will incorporate the recommendations of the LTP/ABTA as appropriate into the LAP.

In addition, there is a suite of policy objectives and guidance in relation to transport and movement contained within County Development Plan 2022-2028 which will be incorporated in the Draft LAP as required. It is also noted that the recently published Sustainable Residential Development and Compact Settlements Guidelines 2024 includes Specific Planning Policy Requirements (SPPR's) for car and cycle parking.

It is important to note that the Glenamuck Distributor Road Scheme (GDRS) is an approved road infrastructure scheme. The commencement of its construction is imminent. It is not within the remit of the Local Area Plan to omit or alter elements of the approved scheme. It is envisaged that the delivery of the GDRS will in turn improve conditions of the local road network. With the diversion of through traffic onto the GDRS, the nature of Enniskerry and Glenamuck Roads, traversing the plan area, would change allowing for improved cycling and walking infrastructure and improvements to the public realm.

Issues with regard to traffic management and the quality of existing roads are operational and do not fall within the remit of a Local Area Plan. The provisions for works outside of the plan area cannot be incorporated into the LAP.

3.8 Biodiversity & Open Space

Approximately 66% of submissions raised concerns around the lack of public open space, local recreation facilities and the impact of development on biodiversity.

i. Biodiversity

In addition to the commentary on biodiversity from prescribed bodies, as set out in Section 2 of this report, a large number of submissions from other persons referred to the loss of hedgerows and trees in the area and the impact of this on wildlife and habitats.

These concerns largely centred around the ongoing development of the area. Concerns were raised in particular with regard to removal of roadside trees and native hedgerows. Concern has also been raised in relation to the potential impact of the removal of trees and hedgerows on to run-off from surrounding mountain areas. Submissions raising these concerns note that there appears to have been limited mitigation measures put in place, with limited planting within new developments and where it has been provided, it does not appear to be native or in appropriate locations.

Submissions have noted the proximity of the plan area to Dingle Glen, a proposed Natural Heritage Area (pNHA). Submissions have also referred to a wide variety of flora and fauna in the area, including the presence of buzzards.

Submissions have requested that the LAP makes provision for:

- the protection and enhancement of biodiversity in the area
- retention of trees and hedgerows
- protection of existing habitats and wildlife.

ii. Open Space & Recreation

Numerous submissions have raised concerns over the lack of public open space to serve the growing population of the area. There is no proper public park and only small areas of green space provided within residential developments are provided. In addition, there are no public playgrounds. Reference is made to a small play area within a residential development which is used widely by residents from outside of that development. Reference was made to the potential provision of allotments in the area. Concerns have been raised about the proposed park as part of the GDRS and its unattractive setting between pylons and under overhead powerlines. A number of queries were raised in relation to the opening of Jamestown Park and access to same and in relation to the opening of the next phase of the Samuel Beckett facility.

Many submissions referred to a lack of playing pitches and recreational / leisure facilities in the area. While there are the pitches at Wayside within the plan area, these are private and not accessible for all residents. Reference has been made to a number of potential facilities, including GAA pitches, a running track, bike tracks, a hurling ball wall, walking routes and a dog park.

Chief Executive's Response and Recommendation

The issues raised in relation to biodiversity, open space and recreation are noted and will be taken into consideration in the preparation of the Draft LAP. It is acknowledged that there is currently no public park and limited recreation facilities within the plan area although the planned Jamestown Park will adjoin the Plan lands.

The Draft LAP will be informed by a suite of policy objectives on biodiversity, open space and recreation, and the Green Infrastructure Strategy in the County Development Plan 2022-2028 together with the dlr Biodiversity Action Plan 2021 -2025, the dlr Climate Action Plan 2024 – 2029 and the dlr Play Policy 2023-2028. In addition, the commentary received from the Department of Housing, Local Government and Heritage will be taken into account together with any commentary from prescribed bodies arising from the Strategic Environmental Assessment process for the plan area.

3.9 Infrastructure & Flood Risk

i. Water / Wastewater and Flood Risk

In addition to the commentary received from the OPW in relation to flood risk, a number of submissions raised concerns in relation to localized flooding in the area that has been exacerbated through a new residential development. Having regard to this, it is requested that flood risk is properly assessed for the plan area.

Submissions have made reference to the proper provision of water and waste water infrastructure to serve the area, requesting that this is in place and sufficient to serve the anticipated growth of the plan area. Reference has also been made to re-routing of a foul watermain within the new GDRS and has requested that this is reflected accurately in mapping.

Submissions were also received supporting SuDS and nature-based solutions within new developments.

ii. Overhead Power Lines

A number of submissions noted the presence of the pylons and overhead power lines that traverse the plan area and have requested that the council engage with ESB networks in relation to their undergrounding.

iii. Construction

A large number of submissions, primarily from local residents have raised concerns around the impacts of construction on their quality of life and on local wildlife, particularly with regard to air and noise impacts. Submissions have requested that there is proper construction management put in place for new developments.

iv. Pollution

Submissions have raised concerns around the environmental impacts of new developments and forthcoming roads projects, particularly with regard to noise reduction measures, potential light pollution impacts on wildlife and air quality, particularly having regard to the removal of trees.

v. Telecommunications

A number of submissions have raised concerns in relation to limited broadband infrastructure in the area and have requested that the new LAP include provisions to support improvements to same.

Chief Executive's Response and Recommendation

The issues raised in relation to various infrastructure, construction and pollution are noted and will be taken into consideration in the preparation of the Draft LAP.

The Draft LAP will be informed by a suite of policy objectives contained in the County Development Plan 2022-2028 in relation to environmental infrastructure and flood risk. In addition, a Strategic Flood Risk Assessment will be carried out for the plan area together with a Strategic Environmental Assessment.

The Planning Authority will continue to engage with prescribed bodies as required, including the OPW, Uisce Éireann and ESB networks.

3.10 Employment & Tourism

Submissions were received noting the tourist potential for the area and have requested that this be incorporated into the new LAP, particularly with regard to local heritage. In addition, a request was also received in relation to the provision of co-working spaces within the plan area.

Chief Executive's Response and Recommendation

The submissions in relation to tourism and employment related uses are noted and will be taken into consideration in the preparation of the Draft LAP.

The Draft LAP will be informed by employment and tourism related policy objectives in the County Development Plan 2022-2028. In addition, regard will be had to the forthcoming dlr Tourism Strategy, the dlr County Heritage Plan 2021 -2025, and the forthcoming Local Economic and Community Plan.



Left: Our Lady of the Wayside Church

3.11 Heritage

In addition to the submission from the Department of Housing, Local Government and Heritage with regard to both archaeological and architectural heritage, there were a number of submissions that noted the heritage and cultural value of the area, particularly with regard to its archaeological heritage. Submissions received note the existence of a number of archaeological sites and monuments and places of historic importance, including the Dolmen, churches, the lead mines chimney and Carrickmines Castle.

Submissions received request that the LAP include appropriate safeguards for archaeological heritage and that access to sites of interest is provided / enhanced and that sign post are provided for same. The role of such sites in promoting tourism has also been highlighted. One submission has requested that a zone of archaeological interest is removed from mapping as no evidence has been found through

Chief Executive's Response and Recommendation

The submissions in relation to the heritage value of the area are noted and will be taken into consideration in the preparation of the Draft LAP.

The Draft LAP will be informed by County Development Plan 2022-2028 in this regard. Appendix 4 of the County Development Plan lists the Record of Protected Structures and the Record of Monuments and Places, Architectural Conservation Areas and Industrial Heritage. The Draft LAP will also be prepared having regard to the dlr County Heritage Plan 2021 -2025.

It is important to note that the National Monuments Service has responsibility for the addition, amending and removal of archaeological sites and/or zones of influence.

3.12 Phasing & Implementation

A number of submission were received raising issues with regard to phasing of development in the area. These submissions had varied views with regard to phasing, with most requesting that a neighbourhood centre and facilities that support the growing population are implemented prior to any further permissions being granted in the area. A small number of submissions have referred to the phasing requirements in 2013 LAP and have requested that similar stringent phasing requirements are not included in the Draft plan.

Chief Executive’s Response and Recommendation

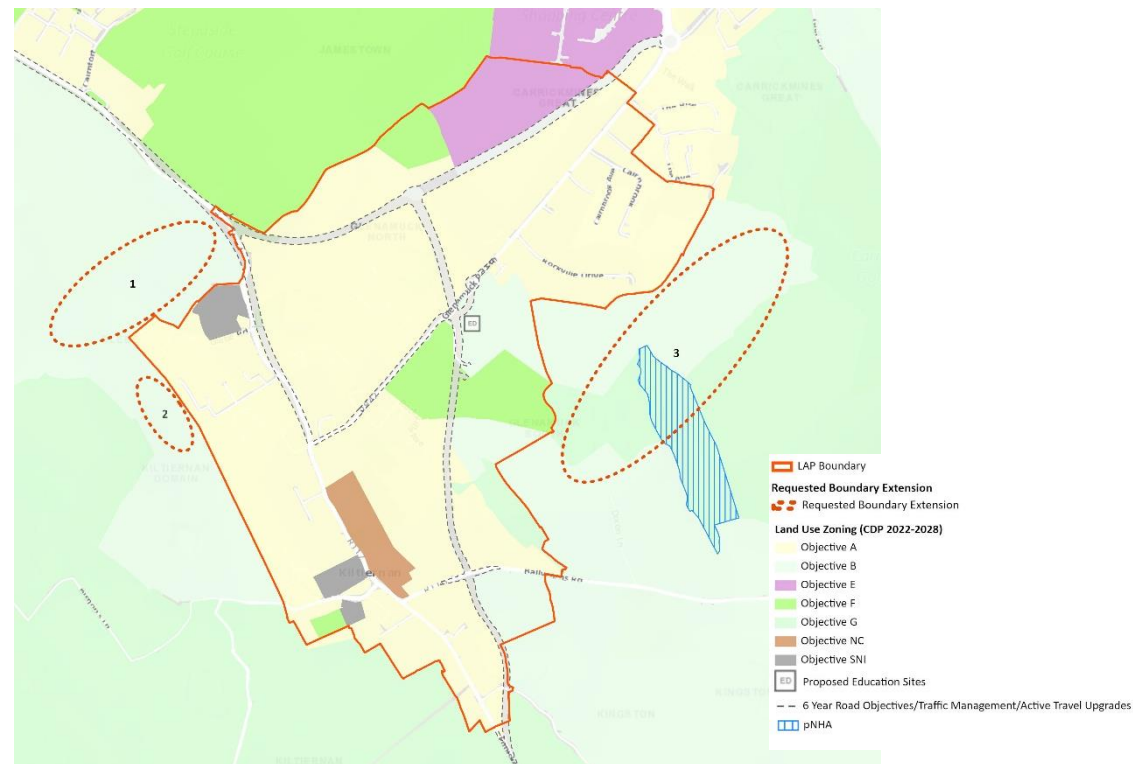
The submissions in relation to phasing are noted and will be taken into consideration in the preparation of the Draft LAP.

3.13 LAP Boundary

A number of submissions have requested that the boundary of the LAP be extended to incorporate additional lands, three submissions identify land parcels to the north (area 1) and southeast (area 3) of the current boundary to facilitate potential changes in land use zoning. Submissions from local residents have requested that the boundary is extended westwards (area 2) to offer opportunities for amenity space and enhanced biodiversity. A submission received also queried the alignment of the boundary in that it does not align with a particular land / field boundary.

The map⁴ opposite illustrates the general areas where the extension to the LAP boundary has been requested.

⁴ Maps are for illustrative purposes only. Maps identify the general location of areas requested to be amended only.



Chief Executive’s Response and Recommendation

The submissions in relation to boundary changes are noted and will be taken into consideration in the preparation of the Draft LAP.

3.14 Zoning & Land Use

i. Land Use Zoning Requests

Submissions received sought three requests to change land use zoning both within and adjoining the LAP boundary. These are illustrated on the generalised map⁵ opposite and include:

- Area ‘A’ to the north: rezone from objective ‘F’ – ‘To preserve and provide for open space with ancillary active recreational amenities’, to allow for residential or commercial related uses.
- Area ‘B’ to the southeast: rezone from objective ‘B’ – ‘To protect and improve rural amenity and to provide for the development of agriculture’ to objective ‘A’ – ‘To provide residential development and improve residential amenity while protecting the existing residential amenities.’
- Area ‘C’ to the southeast: rezone lands objective ‘G’ – ‘To protect and improve high amenity areas’ to objective ‘F’ – ‘To preserve and provide for open space with ancillary active recreational amenities.’

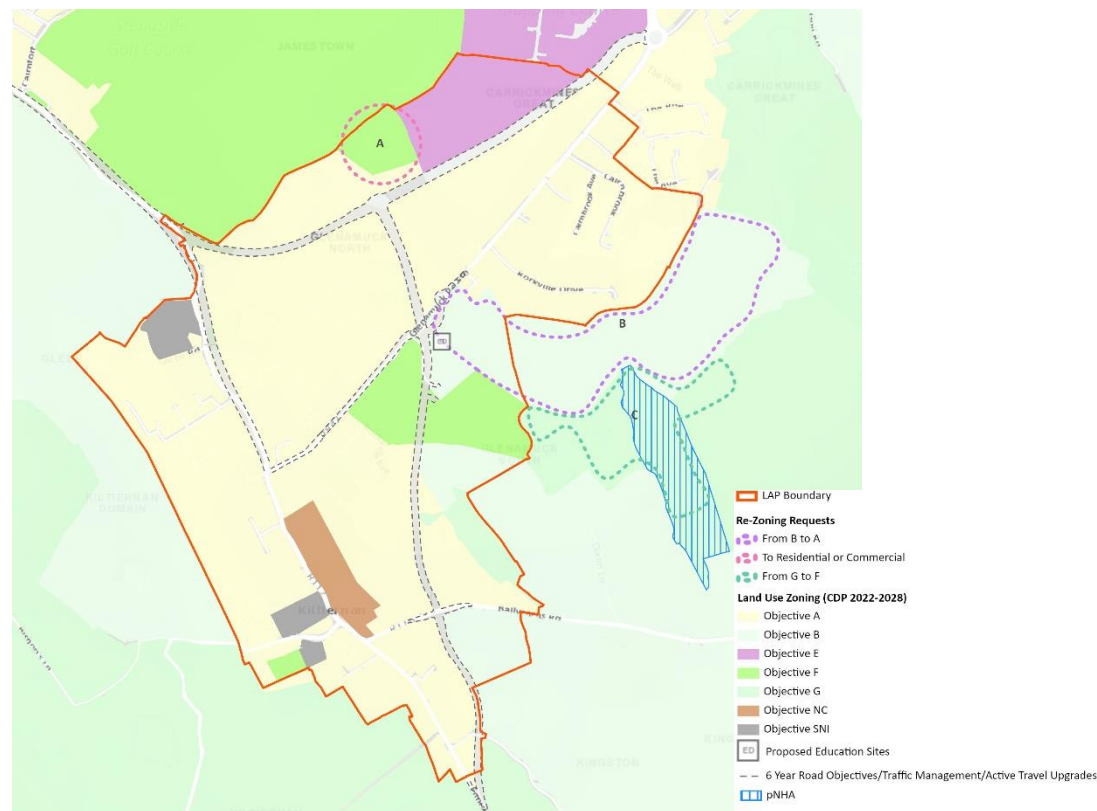
A submission was also received asking that the LAP considers the inclusion of a strategic land reserve and the submission referring to the proposed boundary extension to the north suggested that those lands could, in the future, be considered for residential development with open space and recreation provisions. Some of the reasons put forward to the proposed zoning changes include:

- Lands zoned F are no longer required – rezoning here would facilitate access into Jamestown Park.
- Additional lands should be zoned to facilitate additional housing in the area having regard to Census 2022 data which shows a faster than expected growth in population.
- The National Planning Framework is currently under review and may require additional zoning for residential development.

⁵ Maps are for illustrative purposes only. Maps identify the general location of areas requested to be amended only.

- The LAP should be future proofed.
- The location of the LAP, proximate to the future Metrolink / Luas green line and public transport links serving the area would facilitate a sequential approach to zoning lands.
- The proposed ‘F’ zone would facilitate additional open space / public park to serve the area and would offer protection to the Dingle Glen pNHA.
- The proposed ‘A’ zoned lands would facilitate the provision of additional schools.

A number of submissions from residents have requested that there be no zoning changes to the west of the LAP, in particular around a wooded area at the back of Bishops Gate in order to protect this area.



ii. Land Use

Submissions were received in relation to lands zoned objective 'E' – 'To provide for economic development and employment', located to the north of the plan area requesting that the Draft LAP give consideration to allowing residential development within the lands. In addition, it was requested that flexibility allowed around an objective in the County Development Plan 2022-2028 on

these lands - 'To protect and preserve Trees and Woodlands' as the provision of commercial development can be difficult if all trees are to be retained. It is noted that planting would be provided in any future scheme. A similar request was made in relation to lands adjacent to Cairnbrook with regard to difficulties around the provision of vehicular access owing to a trees and woodland objective.

Chief Executive's Response and Recommendation

The issues raised around land use zoning and land uses have been noted. The County Development Plan 2022-2028 sets the land use zoning objectives and uses that would be permissible in principle and/or open for consideration within each land use. In the hierarchy of plans, a Local Area Plan sits under a County Development Plan, and a LAP is required to be consistent with all provisions of a County Development Plan including all land use zoning objectives and uses permissible within each zone. Submissions have noted that any change in zoning would require a variation to the County Development Plan as the LAP must be consistent with the overarching County Development Plan.

It is acknowledged that the National Planning Framework is under review. Any amendments to population projection figures arising from this review, will be reviewed by the Planning Authority having regard to the Core Strategy of the County Development Plan 2022-2028. In the event that the Planning Authority is required to revisit the core strategy on foot of the NPF review, this would be considered at a strategic County wide level.

A review of residential land availability in County would have regard to the provisions of the recently published Section 28 Ministerial Guidelines 'Sustainable Residential Development and Compact Settlements Guidelines', 2024. Having regard to these guidelines, the Kiltiernan-Glenamuck LAP would be considered as an 'urban extension'. A sequential approach would apply to any potential zoning change.

The submission made by the Department of Housing, Local Government and Heritage has specifically requested that lands zoned objective 'G' – 'To protect and improve high amenity areas' should be retained as such. It is noted that open space is permitted in principle within lands zoned 'G' and education uses are open for consideration within lands zoned 'B'.

3.15 Other Issues

There were a number of submissions that welcomed the opportunity to be involved in the plan making process and look forward to future opportunities.

Other issues raised include:

- Restrictions on planning permissions including:
 - Not permitting an increase in density where lower density has already been granted.
 - Not permitting developments that materially contravene statutory plans.
 - Where a scheme has been refused but certain principles were accepted, e.g. building heights, that these elements would be permitted in future proposals.
 - That prematurity reasons with regard to the adoption of a new LAP are not used to refuse permissions.
- Queries as to why some lands are not being built on.
- That this report provides clarity with regard to the policy context for proposed development until such time that the new LAP is adopted.
- It appears that some planning permissions are not being implemented in full with some schemes not including their required open space.
- The issues paper did not include any tangible detail with regard to policy or objectives for the area on which to comment on.

Chief Executive's Response

Many of the issues listed under this section are outside the remit of a local area plan. The issues paper is a document that sets some context and poses a series of questions to assist with preparing a submission at pre-draft stage – this document does not include policies or objectives. Consultation on the draft plan will allow for comment on policies and objectives.

It should be noted that there is no provision in legislation to prevent proposals coming forward to amend a previous planning permission. There may be a variety of reasons in relation to lands not coming forward for development.

There is no mechanism within the County Development Plan 2022-2028 to prevent applications from being refused in the

4. Student Consultation

As part of the pre-draft public consultation, members of the planning team visited Our Lady of The Wayside National School in Kiltiernan to gather the views of local children. Ms Gannon's 4th class agreed to take part in a number of activities with the team to get the children thinking about the Kiltiernan-Glenamuck area, including its history, things the children like and don't like about the area and what they would like to see in the future.

The image below is a board with strengths (in green), weaknesses (in yellow) and opportunities (in orange) that the children were asked to share with the team. It isn't easy to read the small stick-it notes in the image so a selection from each category is listed below:



'Things I like':

- Living close to my friends
- Living close to my school
- Krispy Kreme, Pepco & Smyths in Carrickmines
- The Chimney
- Playing on the field beside the school
- The Spar in Carrickmines Manor
- Circle K
- Golf in Stepside
- The Gap (Glencullen) and Fernhill Park
- Stepside Village
- Farmer Browns

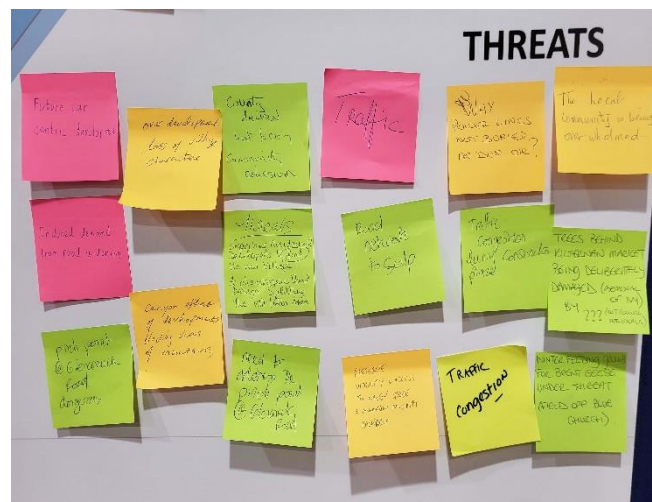
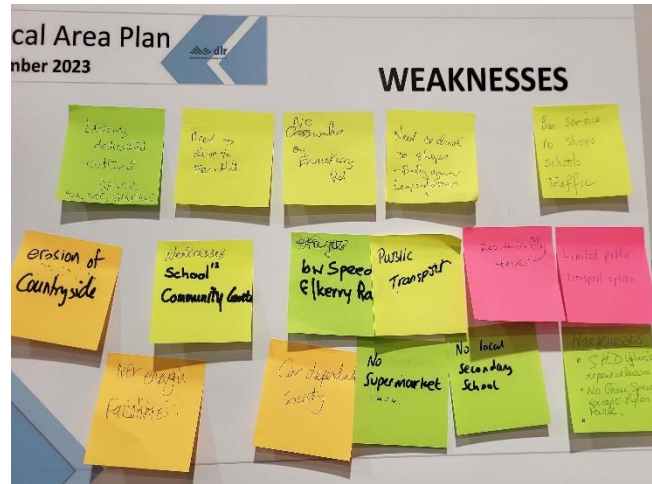
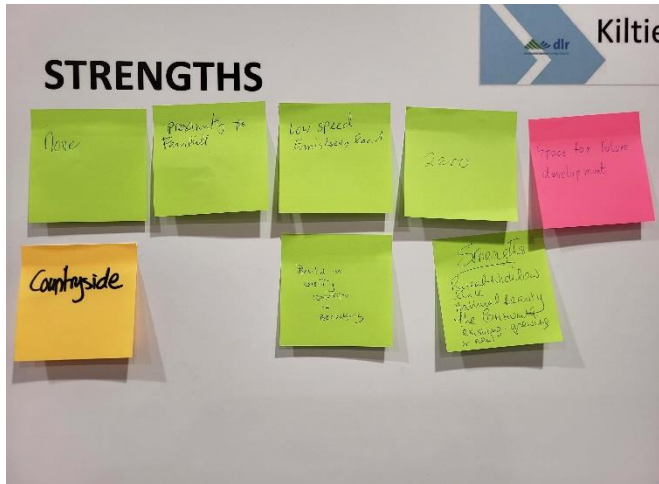
'Things I don't like':

- Glenamuck Road
- That there is no playground near my home
- There is no park, other parks are too far
- There are no shops
- Tiny paths
- There are no animals
- There are no traffic lights
- There are too many cars
- I can't walk to school – it is pretty risky to do this
- There are no cycle paths
- People littering

'My idea to make things better':

- We need more parks so that we don't have to drive to Cabinteely
- A playground
- Pitches – GAA, football and hockey
- Bike tracks
- Make more fun places
- A stationary shop
- An ice cream shop
- A restaurant and multiple cafes
- A new school
- A swimming pool
- A dog park
- Make Glenamuck Road bigger and kick down the wall.

5. Public Information Event SWOT Board



The images on left show some of the views of attendees at the public information sessions in relation to the strengths, weaknesses, opportunities, and threats (SWOT) within the Kiltiernan-Glenamuck area. Much of the commentary reflects issues raised in submissions received. Some of commentary includes:

Strengths:

- Countryside / rural
- The community
- Proximity to Fernhill
- Space for future development

Weaknesses:

- Not enough facilities
- Public transport
- No secondary school
- No supermarket
- No crossings
- Depend on car

Opportunities:

- Protect greenbelt between Kiltiernan and Stepside for recreation and biodiversity / protect hedgerows
- Secondary school
- Improved bus service / connection to Luas/DART
- Social spaces & recreation
- Community building
- More green space / parks
- Cycle paths

Threats:

- Traffic / Congestion
- Overhead power lines
- Glenamuck Road
- Future car centric developments
- Loss of character
- Lack of community cohesion.

6. Next Steps

The Planning Authority will now prepare a Draft Local Area Plan for Kiltiernan-Glenamuck taking into account the issues raised during the pre-draft consultation. The Draft Local Area Plan will be evidence based, informed by a series of studies and assessments. The Planning Authority will also continue to engage with all relevant prescribed bodies during the plan making process.

The Draft Local Area Plan will set out a vision for the plan area and will contain a suite of policies, objectives and guidance specific to Kiltiernan-Glenamuck. Once completed, the Draft Local Area Plan will be placed on public display for a 6 week period, during which time, members of the public and interested parties will have another opportunity to have your say. Once placed on public display, the statutory process for making the plan commences as illustrated in the graphic opposite.

