

# **Draft Old Connaught Local Area Plan 2025**

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

**May 2025**

### **Volume II Summary and List of Submissions / Observations Received**

In accordance with section 20 (3) (c) (ii) (I) and 20 (3) (c) (ii)(II) of the Planning and Development Act, 2000 (as amended), Volume II, Part 1 sets out a summary of all submissions / observations and Volume II, Part 2 includes a list of persons or bodies who made submissions or observations.

**Part 1: Summary of Submissions / Observations Received**

<b>DLR Submission No: <u>B0001</u></b>	<b>Person: Gas Networks Ireland</b>	<b>Organisation: Gas Networks Ireland</b>
<b>Summary of Submission / Observation:</b> <ul style="list-style-type: none"> <li>The submission provides mapped information on gas networks in the LAP area and its vicinity.</li> <li>The submission notes that any works in the vicinity of a Gas Transmission Pipeline must be completed in compliance with the document "Code of Practice for Working in the Vicinity of the Transmission Network" (Procedure No: AO/PR/127; Rev 3; Date: May 2021).</li> </ul>		
<b>Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):</b> Chapter 10		

<b>DLR Submission No: <u>B0002</u></b>	<b>Person: Environmental Protection Agency (EPA)</b>	<b>Organisation: Environmental Protection Agency (EPA)</b>
<b>Summary of Submission / Observation:</b> <ul style="list-style-type: none"> <li>The submission sets out the role of the Environmental Protection Agency (EPA) regarding the plan making process. It highlights the EPA's focus on promoting the full and transparent integration of the findings of the Environmental Assessment into the Plan and advocating that for local area plans, the submission states that a "self-service" approach is utilised for the local authority and attaches the relevant guidance document "SEA of Local Authority Land Use Plans – EPA Recommendations and Resources".</li> <li>The submission provides instructions on information which should be contained within an Environmental Report.</li> <li>The submission indicates that screening any future amendments to the Plan for likely significant effects should be undertaken, using the same method of assessment applied in the "environmental assessment" of the Plan.</li> <li>The submission highlights that the plan must be in compliance with the objectives and policy commitments of relevant national and regional planning policy documents.</li> <li>The submission provides relevant guidance on SEA-related monitoring via their website.</li> <li>The submission provides a brief framework for an SEA statement, to be prepared after the adoption of the plan, including further consultation with listed statutory bodies.</li> </ul>		
<b>Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):</b> Strategic Environmental Assessment		

<b>DLR Submission No: <u>B0003</u></b>	<b>Person: Alan &amp; Maureen Grainger</b>	<b>Organisation:</b>
<b>Summary of Submission / Observation:</b> <ul style="list-style-type: none"> <li>The submission acknowledges the plan making process approach which they consider will be widely approved. It also thanks the Local Authority for producing</li> </ul>		

<p>exciting prospects for the area's future and urges care to not lose the character of Old Connaught.</p> <ul style="list-style-type: none"> <li>• The submission requests the inclusion of further detail in relation to proposed road networks in the LAP area. Specifically, the need for clarity on travel from Ballyman Road to the M11, via Ferndale Road and Allies River Road.</li> <li>• The submission requests the inclusion of further details in relation to proposed sewerage pipe network designs around the village, to the treatment plant in Shanganagh.</li> <li>• The submission requests a more detailed outline of which trees are to be protected during development and which are not. It also notes that the current level of tree density in the area is a key contributor to Old Connaught's character.</li> </ul>
<p><b>Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):</b></p> <p>Chapters 6, 7, 9 and 10</p>

<b>DLR Submission No: <u>B0004</u></b>	<b>Person: Kieran Ross</b>	<b>Organisation:</b>
<p><b>Summary of Submission / Observation:</b></p> <ul style="list-style-type: none"> <li>• The submission welcomes the proposed development plans and is happy to see progress in the area.</li> <li>• The submission raises the issue of noise pollution from the M11 and its effects on residents in its vicinity. The submission requests that soundproofing measures, such as acoustic barriers, be implemented along the M11 boundary to protect residents.</li> </ul>		
<p><b>Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):</b></p> <p>Other Issues</p>		

<b>DLR Submission No: <u>B0005</u></b>	<b>Person: Adrian and Aisling Buckley</b>	<b>Organisation:</b>
<p><b>Summary of Submission / Observation:</b></p> <ul style="list-style-type: none"> <li>• The submission highlights the importance of tree protection primarily on Ballyman Road within two of the proposed character areas – the Village Core and the Western character area. It also acknowledges the Draft Plan's protection of trees outlined in Figure 4.8, page 30 of the LAP.</li> <li>• Suggests that the heights of buildings in the neighbourhood centre and western character should take into account the axis view of Knocklinn House from Old Connaught Avenue.</li> </ul>		
<p><b>Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):</b></p> <p>Chapters 4 and 7</p>		

<b>DLR Submission No: <u>B0006</u></b>	<b>Person: John O'Neill</b>	<b>Organisation:</b>
<p><b>Summary of Submission / Observation:</b></p> <ul style="list-style-type: none"> <li>• Submission is of the opinion that most traffic traveling down Old Connaught Avenue (east) is turning left to merge onto the motorway either north or south.</li> </ul>		

- Submission requests that traffic (buses and cars) going to and from Bray Emmets should be able to move around without entering the local road network.
- Submission requests that traffic entering the Wilford Roundabout to the "AXA" junction should be expanded from single lane to 2-3 lanes. Traffic entering the roundabout should also be allowed to take 2/3 lanes in order to access to Old Connaught Avenue, Bray Town and Woodbrook. There is an emphasis on the necessity of including this in any plan.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapter 6

**DLR Submission  
No: B0007**

**Person: David and Paul  
Butler**

**Organisation:**

**Summary of Submission / Observation:**

- Submission welcomes the opportunity to contribute to this planning initiative as owners of 1.59 ha site adjacent to the Old Connaught House apartments and notes that their intention is to develop this site in compliance with dlr's LAP.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapter 4

**DLR Submission  
No: B0008**

**Person: William Maher**

**Organisation:**

**Summary of Submission / Observation:**

- Submission cites concerns regarding the closure of M11 bridge on Old Connaught Avenue to make provision for a bus gate as a regressive step towards providing a local road network with routes north to Loughlinstown; south towards Kilmacanogue and west towards Enniskerry highlighted as being impacted.
- Provides positive commentary regarding the proposed local road network but suggests that additional access to the M11 northbound should be provided from Old Connaught Avenue across from Bray Emmet's GAA Club or off the new road going north parallel to the M11 on its west side, should be considered to accommodate for the increase in traffic.
- Encourages the upgrade of Thornhill Road going southward to connect with the Fassaroe interchange which could require a new local road and bridge in alignment with recent Irish Water pipe laying works.
- Highlights that the proposed road network changes will increase traffic in an already congested area specifically around Dublin Road, Bray from the Wilford roundabout environs to Castle Street, Bray.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapter 6

**DLR Submission  
No: B0009**

**Person: Anna Keogh**

**Organisation:**

**Summary of Submission / Observation:**

- Submission expresses that the Draft LAP fails all residents at Old Connaught House.
- Strongly encourages that planned local access should be extended to include Old Connaught House.
- Objects to the proposed road network that shifts traffic towards a peripheral route to get to Bray especially for residents of the Old Connaught House.
- Raises concerns regarding the enforcement of the bus gates on Old Connaught Avenue.
- Submits the LUAS will cause congestion in the area, with only pedestrian access for those disembarking on Old Connaught Avenue.
- Submission is of the opinion that both the bus gates and LUAS stop should be facilitated on the Thornhill/Ballyman Road area rather than Old Connaught Avenue due to the size, width of the roads and the location of proposed housing developments.
- Cites concerns about the proposed plan increasing traffic congestion in the already congested Bray/Old Connaught area.
- Requests that additional feasibility/modelling studies be undertaken assessing the anticipated volumes of traffic.
- Submits the importance of heritage to the Old Connaught area and requests that significant buildings like Old Connaught House, the walled gardens at Festina Lente and the old Burial Ground on Old Connaught Avenue should be preserved at all costs and taken into the care of the OPW (except for Old Connaught House).
- Highlights the need for clarification regarding tree protection along main roads once development begins and requests confirmation about tree protection and new tree planting along new roads.
- Notes that within the plan there appears to be a lack of green spaces and planting, which is considered disappointing.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapters 6, 7, 8 and 9

DLR Submission No: <u>B0010</u>	Person: Johana Ferriere	Organisation:
<p><b>Summary of Submission / Observation:</b></p> <ul style="list-style-type: none"> <li>• Notes that the plans outlined in the Draft Plan will have a significant impact on all residents of Old Connaught House in relation to local transport access, road layouts and transport changes together with new housing developments. Specifically, changing Old Connaught Avenue into a one-way street with two bus gates and no through access to Old Connaught House from the Bray Road Junction.</li> <li>• Highlights that the one-way system on Old Connaught Avenue restricts the ability to turn left when exiting Old Connaught House and that access to Bray will shift to a circular route via Ferndale Road or a proposed new road between Old Connaught House and Ferndale Court towards Bray.</li> <li>• Acknowledges the addition of new link roads, changes to existing road network for local access, feeder roads to the M50 motorway and a LUAS extension that will run along Old Connaught Avenue.</li> <li>• Refers to the proposed housing developments along Old Connaught Avenue and the density range (2 – 4/5 stories) as well as housing developments on Thornhill and Ballyman roads. Notes there are plans to build 2,000+ residential units (both private and affordable) within these areas.</li> </ul>		

- Submits that the integrity of what is essentially an historical area will be compromised with these planned developments.
- Cites concerns that the proposed road network will not ease traffic congestion and will become more congested.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapters 6 and 9

<b>DLR Submission No: <u>B0011</u></b>	<b>Person: Pamela McCormack</b>	<b>Organisation:</b>
<p><b>Summary of Submission / Observation:</b></p> <ul style="list-style-type: none"> <li>• Submission welcomes thoughtful and sustainable planning.</li> <li>• Expresses concerns and objections to elements related to heritage preservation, architectural design, scale of development and infrastructural readiness.</li> <li>• Notes the historic character of the area with reference to sites like Old Connaught House, Festina Lente and the area's cemetery (which contains national monuments) and emphasises the need for their settings to be protected and enhanced.</li> <li>• Submits that the plan risks eroding heritage with modern developments. Requests that the plans for the future village centre align with the planning and development process taken in Enniskerry with an emphasis on low-rise, traditionally styled buildings; use of appropriate materials and finishes; a layout that respects existing historic structures and landscape features.</li> <li>• Strongly objects to the proposed 2,400 housing units within the LAP boundary due to the impact on the character, environments and infrastructure of Old Connaught and submits that the building heights range (up to 4 storeys) is out of scale. Suggests that a two-storey height limit would better align with area's village character.</li> <li>• Cites concern about the limited amount of green open space in comparison to the proposed density. Highlights the need to protect trees and preserve views to the sea.</li> <li>• Requests that infrastructure (roads and traffic management; public transport; drainage and water services; schools, healthcare and community facilities) and the village core are delivered first prior to housing being permitted. Submission is of the opinion that without additional infrastructure, development will lead to significant strain on local services and reduce the quality of life for current and future residents.</li> <li>• Objects to the proposed bus gate that would limit access to local heritage sites such as Old Connaught House. Requests that local access is retained and extended to Old Connaught House. Objects to the one-way system on the northbound site of Old Connaught House as it disrupts connectivity and accessibility for residents and visitors. Suggests the proposed bus gate could be moved to the new road so that local, quick access to Bray and Enniskerry is retained for residents and that traffic to the proposed village would also be limited.</li> <li>• Highlights the need for a heritage-led vision for the village which includes: <ul style="list-style-type: none"> <li>◦ A small village centre with mixed-use, appropriately scaled buildings.</li> <li>◦ Conservation-led design principles.</li> <li>◦ Prioritising local character, community, and the environment over large-scale housing targets.</li> </ul> </li> <li>• Concludes the submission and requests the following: <ul style="list-style-type: none"> <li>◦ Significantly reduce the number of proposed housing units.</li> </ul> </li> </ul>		

- o Preserve mature trees and sea views.
- o Ensure infrastructure is developed before housing.
- o Protect heritage sites and design a village core in keeping with historic values.
- o Oppose the bus gate and one-way system in favour of improved local access.
- o Oppose the one-way system northbound of Old Connaught House.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapters 2, 4, 6, 7, 8, 9 and 11

**DLR Submission  
No: B0012**

**Person: George Reddin**

**Organisation:**

**Summary of Submission / Observation:**

- Cites concern over section 11.3.1. on page 117 of the Draft LAP (Old Connaught – Phase A) and specifically the lack of requirement for a developer to provide a link road between Ferndale Road and the proposed north-south link road until Phase A sub-phase 2.
- Submits that an additional 450 units cannot be supported by existing infrastructure capacity due to the current volume of traffic on Old Connaught Avenue (from the junction with Dublin Road) during peak hours which is further exacerbated by traffic to St Gerard's and John Scottus schools, with significant tail backs on Old Connaught Avenue.
- Urges that the infrastructure requirements of sub-phase 1 of Phase A in the Draft LAP and the phasing table be amended so that works relating to the link road between Ferndale Road and the north-south link road are completed prior to the occupation of any residential development in sub-phase 1.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapter 11

**DLR Submission  
No: B0013**

**Person: Ms. SJ Knight**

**Organisation:**

**Summary of Submission / Observation:**

- Submission is opposed to planning proposals for Old Connaught Road and Ferndale Road, as they live in Old Connaught House which has a historic and protected status.
- Cites concerns with road network changes near Old Connaught House, specifically regarding the lack of direct access to Bray and the proposed route which will take users through Rathmichael to Shankill and down to Bray. Requests local access to Ferndale Road and notes that the beautiful building would be surrounded by the increased traffic.
- Cites concern about the impact of new development on the character of the area and the value of existing properties.
- Questions whether new properties will be on main drainage and would welcome an opportunity for existing residents to be connected to main drainage.
- Enquires if the gardens at Festina Lente will continue to be cared for and are concerned about the potential for neglect.

- Appreciates that change and development is coming, but it must take place with an appreciation of the impact that change, and development will have on people's sense of security and wellbeing.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapters 4, 6, 9, 10 and Other Issues

**DLR Submission  
No: B0014**

**Person: Ann Tierney**

**Organisation:**

**Summary of Submission / Observation:**

- Cites concerns regarding the size and building heights presented for the proposed neighbourhood centre which could impact the character of their single storey property at Thornhill Road. Recommends the building be stepped back from the adjacent old wall. Submits that any building with more than 2/3 stories would be unacceptable.
- Wants apartments adjacent to the neighbourhood centre to be the same height (2/3 stories). Enquires about the type of shops/businesses that will be located in the neighbourhood centre. Raises concerns about anti-social behaviour if there was a takeaway/off-license with late opening hours.
- Notes concern regarding access to and from their house due to being situated in the epicentre of the village centre. Submits that it is unclear which roads are a one-way system. Enquires about access to Ferndale Road and Old Connaught Avenue. Requests clarification about having to employ a circuitous route to enter and exit the house. Indicates the impact the proposed road network changes will have on the property's residents. Submission questions if there will be a possible cul de sac outside of the property on Ballyman Road and its impact on family.
- Concludes with a note that they are not averse to development but emphasises the need for development to be done sympathetically both to the residents and to the village environment currently in existence.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapters 4, 5 and 6

**DLR Submission  
No: B0015**

**Person: Tara Burns and  
Patrick Casey**

**Organisation:**

**Summary of Submission / Observation:**

- The submission provides an overview of their property at Cuilin in terms of its key components and their relevance to the dlr CDP 2022-2028 and Chapter 9 of the Draft LAP. This includes the protected structure status of the house and gateway on the site, as well as the protected views identified between the house and the M11. Reference is made to a Victorian walled garden that runs to the west and north sides of the property and adjoins Allies River Road. Reference is made to chapter Section 9.4.1 and 9.4.4. of the Draft LAP in relation to heritage and the submission indicates that they are taken aback by the proposed road plans in the vicinity of the house.
- The submission indicates that they are taken back by the proposed road and LUAS plans in the vicinity of the house in the Draft Plan, resulting in the property being surrounded on all four sides by significant roadways.
- The submission outlines the negative impact on their property from the noise and air pollution from the M11, and their lack of ability to mitigate these impacts and the lack of a tall wall provided at the time of the construction of the M11.



- The submission also raises concerns about loss of privacy from a proposed footbridge connection on Allies River Road, over the M11, which is included in the N11/M11 preferred corridor plan. The submission considers that the proposed road plan is the antithesis of what the Draft LAP sets out are the considerations when developing around the protected structures in Old Connaught.
- The submission objects to the choice of proposed road layout with respect to the proposed bridge and new proposed east-west road along their property's southern boundary line. The submission further indicates that the southern boundary view will be impeded, and the property will be viewable from the proposed east-west bridge.
- The submission indicates concerns in relation to the location of the north-south road proposal and proposed LUAS route to the site's west boundary, due to loss of privacy. It suggests an alternative location for this proposed road to be between Ferndale Court and Ferndale Road. The submission indicates that the proposed routes of the new north-south and east-west roads would materially impact upon the character of their property and its surrounding area.
- The submission questions whether there has been an inconsistent approach to Cuilin as a protected structure compared to other existing protected structures in the Draft LAP area.
- The submission also indicates that the Junction 5 upgrade proposals from the N11/M11 Junction 4 to Junction 14 Improvement Scheme are a viable alternative to the proposed bridge over the M11 in the Draft LAP. Submitter encourages the Local Authority to engage with the relevant bodies to pursue its progression.
- Submitter queries what consideration was given, during the Draft LAP preparation, to the impact on them from road noise and nuisance generated by the M11, from traffic moving eastbound over the M11 via the new bridge and the proposed links roads in the vicinity of the site.
- The submission raises concerns that the adjacent proposed travel network including LUAS and change in land uses would cause security concerns for the property. It asks that these be mitigated were the proposed development to proceed.
- The submission acknowledges the importance of sustainability and climate action and their integration into the Draft LAP but expresses frustration that they are not allowed implement sustainable interventions on the property due to its protected status.
- The submission notes that the property is subject to intermittent flooding due to topographically influenced run-off into the site. It's noted this problem is subject to a drain under the M11 becoming obstructed occasionally. They ask for adjacent proposed development to take flood risk into consideration.
- The submission notes that the wooded area directly to the north of Allies River Road is an important habitat for a family of buzzards and that any proposed development takes this information into consideration.
- The submission concludes by indicating that the dlrc development team did not fully understand or appreciate the layout of the house or walled garden and invites officials to visit the property.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapters 6, 7, 9, 10 and Other Issues

**DLR Submission  
No: B0016**

**Person: Al O'Tuathaigh**

**Organisation:**

**Summary of Submission / Observation:**

- Submission highlights the views from Ballyman Road across the flat Enniskerry Delta fields to the Sugarloaf as some of the country's finest which deserve

<p>protection. Proposes the construction of a viewing platform to provide the public with unobstructed views of the delta area from a height.</p> <ul style="list-style-type: none"> <li>States that Ballyman Lane is the most beautiful winding rural lane in the County and also deserves protection.</li> </ul>
<p><b>Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):</b> Chapter 7 and Other Issues</p>

<b>DLR Submission No: <u>B0017</u></b>	<b>Person: Matthew Carty</b>	<b>Organisation:</b>
<p><b>Summary of Submission / Observation:</b></p> <ul style="list-style-type: none"> <li>Submission highlights three overarching issues: <ul style="list-style-type: none"> <li>A plan to use their property at Old Connaught Avenue to develop a major new road through the area.</li> <li>The total inadequacy of the current infrastructure to support any level of development in the area.</li> <li>A proposal to go ahead with the development, in the short term with the development of c.450 residential units without addressing any of the infrastructural deficits except wastewater disposal.</li> </ul> </li> <li>The submission states that infrastructure is a key issue for their consideration. It acknowledges that although a good level of detail has been provided in the Draft LAP for phasing and infrastructure delivery, there are shortcomings.</li> <li>The submission criticises the lack of transport and other infrastructure planned for delivery before Phase A1 commences, and the resulting congestion implications for Old Connaught Avenue.</li> <li>The submission claims the Draft LAP fails to include any information on how existing homes in the area will be connected to new wastewater infrastructure.</li> <li>The submission criticises the plan for aiming to retain the existing character of the area while simultaneously allowing for development numbers that would be in direct conflict with this, particularly in Phases A and B.</li> <li>The submission notes their alarm that an indicative proposed road is shown to be running through their property.</li> <li>The Draft Plan appears to have been developed without any consideration of the existing homeowners/occupiers particularly those at the eastern end of the area. The submission believes it is anomalous for the Draft LAP to show existing one-off properties along Old Connaught Avenue being retained in the wider context of development in the area.</li> </ul>		
<p><b>Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):</b> Chapters 4, 6, 10 and 11</p>		

<b>DLR Submission No: <u>B0018</u></b>	<b>Person: Transport Infrastructure Ireland (TII)</b>	<b>Organisation: Transport Infrastructure Ireland (TII)</b>
<p><b>Summary of Submission / Observation:</b></p> <ul style="list-style-type: none"> <li>TII acknowledges notice of the Draft Old Connaught Local Area Plan consultation period and outlines its role in delivering transport infrastructure and services.</li> <li>The submission provides a brief overview of the LAP area and its surrounds regarding their relevance to national transport policy.</li> <li>The submission reiterates from its pre-draft stage submission the strategic importance of protecting the N11/M11 road for national and regional movement, and the provisions of official policy set out in Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012).</li> </ul>		

- The submission reminds the Local Authority that the N/M11 Junction 4 to Junction 14 Improvement Scheme is suspended at present. Reference is made to the N11/M11 Bus Priority Interim Scheme remaining in place.
- Regarding the TII's continued advocacy of evidence-based area transport assessments, it acknowledges the stakeholder consultation in the preparation of an Area Based Transport Assessment (ABTA) to inform the Draft Plan that forms part of the Infrastructure Capacity Assessment (ICAS) which has been prepared for an area including the Old Connaught and Rathmichael LAP areas. TII indicate that they were a stakeholder as part of the ICAS study process and positively acknowledge the finalised versions of the ICAS reports.
- TII recommends a text revision in the Draft LAP subsection 2.2.1.2 in order to recognise the Section 28 *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) as leading national guidelines to inform LAP development objectives.

TII recommendation no. 1: Revise text at Draft LAP subsection 2.2.1.2 *Section 28 Ministerial Guidelines* as follows:

"The Guidelines of particular importance in the preparation of this Draft Plan include inter alia: **Spatial Planning and National Roads Guidelines for Planning Authorities (2012)**; Local Area Plans – Guidelines for Planning Authorities (2013); Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities (2024); Sustainable Urban Housing: Design Standards for New Apartments' (2022); and Urban Development and Building Height Guidelines (2018)...."

- Submission notes the significant volume and breath of the ICAS. The submission notes previous concern that the significant volume and scale of the ICAS could lead to some transport measures not being properly transposed into future statutory plans for the areas. Recommends a text addition to section 6.1 of the Draft Plan which makes reference to the ICAS Part 3 report.

TII recommendation no. 2: Revise section 6.1 *Introduction* as follows:

"This Chapter is primarily policy based. It is informed by an Area Based Transport Assessment (ABTA) which includes recommendations with regard to the proposed transport strategy for the LAP area. **The ABTA is set out in ICAS – Part 3 Options Development and Assessment Report which accompanies this LAP.**"

- TII notes that any flexibility in the phasing and implementation of transport infrastructure in Chapter 11 must have regard to the content of the ICAS and the ABTA within. This is in order to ensure the continued protection of the national road network.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapters 2, 6 and 11

DLR Submission No: B0019	Person: Katie O'Brien, Ray Stevenson	Organisation:
<b>Summary of Submission / Observation:</b> <ul style="list-style-type: none"> <li>• The submission explains the historical context of their home at Old Connaught Avenue and its current wastewater set-up.</li> <li>• The submission notes that due to the terraced nature of the home and neighbour's home, effluent must be pumped out through the inside of the buildings and the result is negatively impactful due to it being unhygienic and a health risk.</li> <li>• The submission encourages the connection of existing homes to a new drainage network when it is being developed in the area, improving quality of life and reducing risks for residents.</li> </ul>		

- The submission encourages the retention of two-way car traffic flow on all sections of Ferndale Road as this is an important connection for the residents to Bray, due to existing congestion on R119, which will likely be congested by new developments in Shankill and Bray.
- The submission requests that parking spaces be provided for the residents of the Cottages, Old Connaught Avenue. These are suggested to be located on the existing footpath, directly opposite the cottages, as having them located immediately outside the cottages would block light into the homes.
- The submission requests that EV charging points be included in any car park design for the proposed Neighbourhood Centre, in order to help reduce fossil fuel dependence and increase air quality in the area.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapters 6 and 10

<b>DLR Submission No: <u>B0020</u></b>	<b>Person: Brid Meehan</b>	<b>Organisation: Old Connaught and District Community Association</b>
<b>Summary of Submission / Observation:</b> <ul style="list-style-type: none"> <li>• The submission draws attention to the high levels of noise pollution as a resident on Allies River Road from the M11. It notes that mitigation of such is not possible even with triple glazed windows.</li> <li>• The submission requests that sound barriers be constructed along the M11 immediately to reduce this noise pollution.</li> <li>• The submission also notes that due to high levels of congestion on the M11, air quality monitoring should begin in the vicinity of their home and Woodbrook College.</li> <li>• The submission states that the construction of the proposed North-South link road will increase surface water run-off and flooding on Allies River Road.</li> <li>• In the context of the proposed slip road to the Old Dublin Road, the submission notes there are tailbacks on the Old Dublin Road as far back as Crinken Church and that the population of the area will soon be the equivalent of Sligo Town.</li> <li>• The submission requests that the site to the north of Woodbrook College be reserved for the expansion of the school as it is already at capacity.</li> <li>• The submission states that the proposed new vehicular bridge across the M11, and its connection to R119, would exasperate the flooding of the nearby section of Crinken Stream.</li> <li>• The submission requests the protection of an existing driveway and gateway currently connecting Festina Lente Gardens with Allies River Road, and its incorporation into a wider greenway network to Shanganagh Park.</li> <li>• The submission notes that that land along Allies River Road is the last sliver of green belt in the country. It notes that retaining this green belt land is vital to the protection of species such as long eared owls, bats, buzzards, woodpecker, mallard, badgers and foxes. It notes these species breed on these lands.</li> <li>• The submission states that access to the proposed green bridge must be constructed in the adjoining fields owned by developers.</li> </ul>		
<b>Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):</b>		
Chapters 2, 5, 6, 10 and Other Issues		

<b>DLR Submission No: <u>B0021</u></b>	<b>Person: Irene O'Mara</b>	<b>Organisation: Old Connaught and District Residents Association</b>
<b>Summary of Submission / Observation:</b> <ul style="list-style-type: none"> <li>• Submission is of the opinion that, as a resident on Allies River Road, the traffic noise levels from the N11 are off the scale even after implementing solutions like</li> </ul>		

<p>triple glazing within the home. Requests that sound barriers/baffles need to be erected immediately. Notes that given the volume of traffic on the motorway and extensive tailbacks at Exit 5, air pollution levels should be monitored at Woodbrook College and existing homes. Submission is of the opinion that noise and air pollution will increase with new proposed road between Ferndale and N11/M50.</p> <ul style="list-style-type: none"> <li>• Submission highlights that the construction of the proposed road parallel to the N11 and Ferndale Road will increase run-off and flooding on Allies Road (to the east and west).</li> <li>• Refers to the tailbacks backing up to the Crinken Church and is of the opinion that, in the coming months, the population of this area will be equal to Sligo Town's population and therefore the proposed slip road to old Dublin Bray Road cannot take the additional traffic from the new road. Requests that the fields to the rear of Woodbrook College be reserved for future educational facilities due to the insufficiency of buildings and playing pitches for existing pupils. Submission is of the opinion that the new road/slip road will reduce the possibility of expansion for the school and playing pitches. Submission is against the construction of the slip road as it will exasperate the potential for flooding for the Crinken Stream (north of the field behind the College) which borders the Woodbrook Downs and the Aske.</li> <li>• Requests that the existing driveway/gateway from Allies River Road to Festina Lente Gardens be retained with a greenway incorporated on either side of the drive to connect with Shanganagh Park via the proposed green bridge on Allies River Road.</li> <li>• Acknowledges that the lands along Allies River Road (to the east and west) are what remains of the greenbelt zoning in the county and therefore requests the maintenance of the existing greenbelt so that the wildlife is protected.</li> <li>• Requests that access to the proposed green bridge must be constructed in adjoining fields owned by developers.</li> </ul>
<p><b>Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):</b>  <b>Chapters 2, 5, 6, 10 and Other Issues</b></p>

<b>DLR Submission No: B0022</b>	<b>Person: Pat O'Loughlin</b>	<b>Organisation:</b>
<p><b>Summary of Submission / Observation:</b></p> <ul style="list-style-type: none"> <li>• Commends the quality of the presentations of the Draft Plan as well as the engagement of Council staff regarding the plan proposal explanations during the public information sessions.</li> <li>• Appreciates the need to develop the area to provide much needed housing but is concerned with elements of the plan such as housing density and heights, lack of clarity around sewer system provisions and traffic congestion. Cites the restriction of access to their home and their neighbours based on the proposals for the vehicular transport network as a significant concern.</li> <li>• Refers to Chapter 6, specifically Figure 6.14 on page 65, to support their concerns about the proposed road network. Specifically, the submission is of the opinion that traveling south along Ferndale Road and arriving at the junction of Allies River Road will result in the inability to proceed to Old Connaught House because of the proposed one-way system running south to north along a short section of Ferndale Road in front of the homes.</li> <li>• Outlines the proposed road network routes that would need to be traversed to gain access and provides a description of seven movements included in the proposed road lay-out. Estimates that the length of the journey (2.5/3.00 km) is a trip that could occur several times a day by residents commuting to work, driving children to and from schools, shopping, etc.</li> <li>• Highlights the need to allow access to the homes on Ferndale Road that features the one-way system and to reconfigure the proposed road network to allow residents to travel the short distance along Ferndale Road from the junction at Allies River Road to the entrance gates and for access maintenance for Old</li> </ul>		

<p>Connaught House residents to travel through the bus gates on Old Connaught Avenue in the same manner as "local residents".</p> <ul style="list-style-type: none"> <li>Acknowledges that their understanding of the rationale for the one-way system and bus gates is not complete but appreciates that there must be some sound planning reasons for these elements of the proposed road network. Requests the draft layout be reconsidered given the concerns listed in the submission and that an alternative be determined to avoid imposing the circuitous journey on all residents of Old Connaught House.</li> </ul>
<p><b>Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):</b> Chapters 1, 4, 6 and 10</p>

<b>DLR Submission No: B0023</b>	<b>Person: Paula Byrne</b>	<b>Organisation:</b>
<p><b>Summary of Submission / Observation:</b></p> <ul style="list-style-type: none"> <li>Notes a need for clarity regarding the lack of links between the two proposed schools shown on the Draft Plan for the greenway adjacent to the Ferndale Road. Recommends that a safe path between the schools would encourage children to be active and healthier by walking or cycling as opposed to going by car.</li> <li>Submission is of the opinion that the current greenway route proposal could undergo improvements as it goes up a big hill following Ferndale Road and then steeply descends which could cause issues for people with mobility issues. Suggests that moving the greenway a little to the right of the map could serve as an alternative route.</li> <li>Emphasises that if the greenway is easy, safe and useful, the number of users will increase and its use become a part of daily life.</li> <li>Concludes by expressing excitement over the greenway proposal.</li> </ul>		
<p><b>Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):</b> Chapter 6</p>		

<b>DLR Submission No: B0024</b>	<b>Person: Rory Barry</b>	<b>Organisation:</b>
<p><b>Summary of Submission / Observation:</b></p> <ul style="list-style-type: none"> <li>Suggests a revision to the proposed route of the greenway adjacent to the Ferndale Road as shown in the Draft LAP.</li> <li>Includes positive commentary about the inclusion of the greenway proposal especially regarding active travel promotion and support of community wellbeing.</li> <li>Recommend improvements to the proposed alignment of the greenway by moving it eastward to link the two proposed educational sites in the plan which would involve less of an incline for users.</li> <li>Highlights that the current route involves a significant incline along the contour of Ferndale Road and is of the opinion that the proposed greenway would be difficult to use given the steep climb and descent. Contends that a path with steep gradients and proximity to a trafficked road undermines the greenway's potential to serve as an inclusive, accessible amenity. Proposes an alternative that would pass along a lower altitude and through the middle of the area labelled as a strategic land reserve which would create a safer, flatter and more inviting option for a wide range of users.</li> <li>Recommends that the creation of a useable, off-road connection between the two schools would be practical and provide a safe and accessible route for children and families traveling to and from school.</li> </ul>		
<p><b>Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):</b> Chapter 6</p>		



<b>DLR Submission No: B0025</b>	<b>Person: Adrienne Matthews</b>	<b>Organisation:</b>
<b>Summary of Submission / Observation:</b> <ul style="list-style-type: none"> <li>Expresses concerns over the proposed route of the urban greenway, outlined on page 42 of the Draft LAP, adjacent to the Ferndale Road.</li> <li>Welcomes the improved walking and cycling infrastructure but cites concerns that the northern section of the proposed greenway goes through a quiet, secluded area of private land for a significant distance, isolated by a large hedgerow to the east, and a lack of many houses, roads or any kind of regular footfall. Greenway proposal raises concerns for personal safety as many walkers might feel vulnerable in this isolated section of the route.</li> <li>Provides a description of feelings of isolation and intimidation in a place where no one else is nearby and help would be hard to reach. Submission is of the opinion that safety is a priority for vulnerable groups, and that the greenway proposal is not appealing to walkers.</li> <li>Urges the Council to consider an alternative route, moving the greenway further east (closer to the proposed school) and on the eastern side of the hedgerow to avoid the unsafe section in the isolated land. Emphasises that this change would increase visibility for the greenway and is closer to areas already in use including a proposed new road. Acknowledges the additional benefit of linking two schools together as well as encouraging future residents to utilize the amenity safely and inclusively.</li> </ul>		
<b>Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):</b> Chapters 6		

<b>DLR Submission No: B0026</b>	<b>Person: Greta Egan</b>	<b>Organisation:</b>
<b>Summary of Submission / Observation:</b> <ul style="list-style-type: none"> <li>The submission raises concerns regarding traffic and road infrastructure proposals in the Draft LAP.</li> <li>Notes that the proposed level of development will increase traffic on the congested local network without the proposed strategic infrastructure upgrades around key access points to the N11 which will burden residents, commuters and schools.</li> <li>The submission states that any development must be progressed in parallel with Junction 5 upgrade featured in the N11/M11 Junction 4 to Junction 14 Improvement Scheme. This will allow connectivity between Old Connaught, the N11, and the Dublin Road.</li> <li>The submission requests that Thornhill Road be upgraded where it is narrow to ensure increased capacity and improved connectivity to the N11 via Junction 6.</li> <li>The submission requests that the Draft LAP's traffic management plan should aim to reduce signalised junctions and improve public transport options while maintaining a car friendly road network.</li> <li>The submission notes that there is a large catchment area for St. Gerard's School which includes County Wicklow and South Dublin. Car transport is currently essential for those in this wider catchment area and any increase in congestion is a safety concern.</li> </ul>		
<b>Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):</b> Chapter 6		

<b>DLR Submission No: B0027</b>	<b>Person: Stuart McCabe</b>	<b>Organisation:</b>
<b>Summary of Submission / Observation:</b> <ul style="list-style-type: none"> <li>Submits support for the plan to further develop the Old Connaught Area.</li> </ul>		

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Other Issues

**DLR Submission No: B0028**

**Person: Bríd O'Donnell**

**Organisation:**

**Summary of Submission / Observation:**

- The submission expresses concern regarding traffic and road infrastructure proposals in the Draft LAP and resultant congestion in the Draft LAP lands.
- Notes the proposed level of development will increase traffic in the congested local network without the proposed strategic infrastructure upgrades around key access points to the N11 which will burden residents, commuters and schools.
- The submission states that any development must be progressed in parallel with Junction 5 upgrade featured in the N11/M11 Junction 4 to Junction 14 Improvement Scheme. This will allow connectivity between Old Connaught, the N11, and the Dublin Road.
- The submission requests that Thornhill Road be upgraded where it is narrow to ensure its needed increase in capacity and increase in connectivity, especially near Junction 6.
- The submission requests that the Draft LAP's traffic management plan should aim to reduce signalised junctions and improve public transport options without restricting car usage in the area.
- The submission notes that there is a large catchment area for St. Gerard's School which includes County Wicklow and South Dublin. Car transport is currently essential for those in this wider catchment area and any increase in congestion is a safety concern.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapter 6

**DLR Submission No: B0029**

**Person: Martin Crowe**

**Organisation:**

**Summary of Submission / Observation:**

- The submission requests to maintain the rural nature of Ferndale Road.
- The submission suggests extending the proposed one-way system on Ferndale Road further north to prevent the road from becoming a rat-run.
- The submission requests that all new developments respect the existing vernacular of Old Connaught, in relation to architecture, landscaping and tree planting.
- Regarding architecture and construction, the submission requests that materials and finishes be consistent as each phase of the plan is being implemented. This is to ensure the retention of the area's heritage and vernacular, as there is a unique opportunity to do something different rather than the usual poor unimaginative designs that are generally approved.
- The submission requests that road signage and markings be kept to a minimum in the Draft LAP area.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapters 4, 6 and 9

**DLR Submission No: B0030**

**Person: Old Connaught House Management Company**

**Organisation: Old Connaught House Management Company**

**Summary of Submission / Observation:**

- The submission is provided on behalf of owners and residents of the 42 apartments which make up Old Connaught House.
- The submission highlights the historic status of Old Connaught House.



- The submission notes their attendance at both drop-in events and commends the Council for the quality of display materials and dlr staff engagement.
- The submission acknowledges the need for housing provision in the area.
- The submission summarises the topics of their concerns including housing density and heights, sewerage systems, consequent traffic congestion and its management.
- The submission notes the topic of greatest concern is the layout of one-way traffic proposals on Ferndale Road, which would limit access to their homes if adopted.
- The submission outlines in detail the proposed route one would have to take in a vehicle if travelling southbound on Ferndale Road in order to get back to Old Connaught House. It notes this detour would be approximately 2.5/3km long and may have to be taken several times a day by some residents.
- The submission claims that the current proposals would cause massive access issues for all 110 residents and service vehicles.
- The submission requests that the proposed one-way stretch of Ferndale Road be reconfigured to allow for southbound travel from the junction of Allies River Road and the Gates of Old Connaught House.
- Regarding Bus Gates, it also requests that residents of Old Connaught House be included in any local access arrangements along Old Connaught Avenue.
- The submission indicates that they don't fully comprehend the rationale regarding one-way systems and bus gates. It acknowledges there must be some sound planning reasons and requests that the draft layout be reconsidered and an alternative be found.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapters 1, 4, 6, 9 and 10

<b>DLR Submission No: B0031</b>	<b>Person: Anna Pierce</b>	<b>Organisation:</b>
<p><b>Summary of Submission / Observation:</b></p> <ul style="list-style-type: none"> <li>• The submission notes attendance at one of the public consultation drop-in days.</li> <li>• The submission expresses shock over the proposed introduction of a bus gate on the Old Connaught Avenue bridge.</li> <li>• The submission notes the proposed new route for their journey home at Connawood Lawn, after exiting the M11 at J5 northbound, would now face a 45-minute journey extension. This extension would be caused from passing by new developments at Old Connaught Avenue, Woodbrook and Shanganagh, Woodbrook College, and Wilford Roundabout.</li> <li>• The submission notes the externalities of such a congested detour including increased wear and tear on vehicles, increased car pollution, and increased carbon emissions.</li> <li>• The submission queries if contraflow or traffic lights has been considered on the bridge in lieu of a bus gate.</li> <li>• The submission suggests the relocation of the bus gate to the other side of Bray Emmets, as forcing more vehicle movement onto the R119 would cause further rat running via Lordello Road and Ferndale Road.</li> <li>• The submission queries if a separate LUAS and bus bridge can be built over the M11.</li> <li>• The submission notes the Junction 5 upgrade proposals featured in the N11/M11 Junction 4 to Junction 14 Improvement Scheme should be revisited to allow for direct access onto the M11 by future residents of the LAP area.</li> <li>• The submission highlights that the traffic studies carried out for this Draft LAP may not have taken into account the new traffic flows caused by the Herbert Road junction closure in Bray.</li> <li>• The submission queries if any upgrade is planned along Thornhill Road to connect the area to Junction 6 of the M11.</li> </ul>		

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapter 6

**DLR Submission  
No: B0032**

**Person: ESB**

**Organisation: ESB**

**Summary of Submission / Observation:**

- Notes that the ESB is a landowner and employer in dlr County with property and infrastructural assets throughout County Dublin serving Old Connaught and its environs.
- Acknowledges the aim of the Draft Plan to guide the future development of the lands surrounding and including the existing Old Connaught settlement via a spatial framework. Recolonises the preparation of this Draft Plan is in alignment with the context of the dlr CDP 2022-2028.
- Highlights how the ESB Networks provides essential services regarding building and maintaining the electricity networks in Old Connaught and County Dublin. Notes the organisation's responsibility for sub-transmission, medium and low voltage electricity network infrastructure construction in the county as well as infrastructure management of sites owned by ESB.
- Welcomes and supports the inclusion of policies related to the improvement, development, protection and enhancement of energy infrastructure in a final Local Area Plan (LAP). Highlights the need for new transmission infrastructure and upgrades to existing infrastructure in order to ensure ongoing adequacy of local and regional connectivity as well as to facilitate the connection of renewable energy resources which will protect Old Connaught's future capacity to facilitate transmission upgrades and the connection of renewable energy resources through distribution infrastructure.
- Supports the addition of Policy OCLAP62 – ESB, which safeguards the reservation of lands for the provision of a 38kV substation which will ensure adequate capacity for future development. Submission is of the opinion that safeguarding these lands, the facilitation of efficient electricity infrastructure projects can be delivered, disruptions to local services can be minimised and sustainable development in the area can be supported.
- Provides a description of the goals of ESB regarding a shift towards more sustainable energy outputs and notes the implementation of energy strategies to transform Ireland into a competitive, resilient, sustainable and low-carbon (and ultimately post-carbon) economy. Supports the Draft Plan's objectives to deliver an overarching land use strategy for the planning and development of Old Connaught.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapter 10

**DLR Submission  
No: B0033**

**Person: St. Gerard's  
School**

**Organisation: St. Gerard's  
School**

**Summary of Submission / Observation:**

- Welcomes the need to adopt a new plan to ensure plan-led development of the area.
- Submission pertains to the St. Gerard's School campus located within the southern portion of the landholding subject to the Draft LAP and occupies a total landholding of 16.4 hectares. Provides description of the school's history and provides for 850 students in attendance at St. Gerard's.
- Cites concerns about the protection of key routes and junctions to and from the school. Requests that the school remain easily accessible by car and references Section 3.5.7.1 in the Infrastructure Capacity Assessment Study (ICAS), especially the statistic about most trips to work, school, and or college being made by car (dominant mode of transport with 68% mode share). Notes that the ICAS

recognises there is no formal pedestrian or cyclist infrastructure in the Draft LAP area and existing public transport services do not support significant levels of use for commuters. Overall, the submission indicated that ICAS acknowledges the limited options for alternatives modes of transport.

- Provides information on research undertaken by the school which demonstrates the following statistics regarding car-borne travel to St. Gerard's:
  - North bound using the off ramp at Old Connaught - 66%
  - South Bound getting off at junction 6 and using Old Connaught Road - 11%
  - Local Road Network (i.e. living in Enniskerry/Rathmichael areas) - 23%.
- Requests that changes to the road network require scrutiny and vigorous assessments to ensure the large school population can continue to access the campus by car.
- Welcomes proposals for improvements of active travel routes in the locale with new residential communities to be connected to shops and schools via proposed active travel routes. Notes the school's endorsement of the "Safe Routes to School Programme" that is to be supported across the Draft Plan area. Emphasises that the Council should adequately plan for the school's large catchment extending from South Wicklow to North Dublin and the primacy of car borne travel to the school.
- Submission provides a description of three access issues regarding local level roads infrastructure and planning upgrades to national level roads. Notes the lack of the bus gate at the top of the off-ramp of Junction 5 northbound (Figure 6.18 in the Draft Plan) within the recently published N11/M11 Bus Priority Scheme Drawings published in April 2025.
- Submission is of the opinion that the impact of this bus gate on vehicular traffic to the school campus is not understood due to the lack of detailed drawings available in both the Draft LAP and N11/M11 Bus Priority Scheme drawings.
- Welcomes the opportunity to consider any developed proposals in respect of this infrastructure so that the impact on the students can be understood.
- Submission is of the opinion that any bus gate provided be located on the east side of the flyover bridge on Old Connaught Road until a full four-way interchange is constructed at Junction 5.
- Notes that the current off-ramp from the N11 heading north bound provides only access onto Old Connaught Road. Contends there needs to be provision within the LAP to facilitate a connection to the upgrade for the N11/M11 into a fully functioning interchange at Junction 5 pending its final design.
- Suggests these linkages require immediate consideration as a part of the plan-making process.
- Supports the proposal for a new road and bridge linking Old Connaught to the Dublin Road due to the potential to alleviate traffic congestion. Additionally supports the proposed link roads between Thornhill Road and Ballyman Road and Old Connaught Avenue and Thornhill Road. Highlights the requirement for both link road proposals to be included and delivered as a part of Phase B residential development planning applications to ensure population growth occurs in tandem with necessary infrastructure upgrades.
- Welcomes the proposal to develop a sustainable local village at Old Connaught, particularly the inclusion of a Neighbourhood Centre, Open Spaces and Strategic Parks and endorses the expansion of the Old Connaught community alongside infrastructural upgrades. Recognises that the Draft LAP master planning embraced best principles of place-making for the proposed new village centre.
- Concludes by highlighting St. Gerard's School as an important educational asset to North Wicklow that is very largely reliant on private car transport due to the student catchment and lack of public transport options in its vicinity. Supports the concept of growth of the local areas but cites concerns that the growth may further burden a transport network already beyond capacity. Highlights that interactions between plans for National Road upgrades and infrastructure upgrades within the settlement require further clarification. Welcomes the opportunity to continue

engaging in the LAP process and emphasise the need to ensure the appropriate implementation and phasing of comprehensive road and transport improvements.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapters 4, 6 and 11

**DLR Submission  
No: B0034**

**Person: Eleanor Bourke**

**Organisation:**

**Summary of Submission / Observation:**

- Submission welcomes thoughtful and sustainable planning but expresses concerns and objections to elements related to heritage preservation, architectural design, scale of development and infrastructural readiness.
- Notes the historic character of the area with reference to sites like Old Connaught House, Festina Lente and the area's cemetery (which contains national monuments) and emphasises the need for their setting to be protected and enhanced.
- Submission is of the opinion that the Draft Plan risks eroding heritage with modern developments. Requests that the plans for the future village centre align with the planning and development process taken in Enniskerry with an emphasis on low-rise, traditionally styled buildings; use of appropriate materials and finishes; a layout that respects existing historic structures and landscape features.
- Strongly objects to the proposed 2,400 housing units within the Draft LAP boundary due to the impact on the character, environments and infrastructure of Old Connaught and the building heights range (up to 4 storeys). Suggests that a two-storey height limit would better align with area's village character.
- Cites concern about the limited amount of green open space in comparison to the proposed density. Highlights the need to protect trees and preserve views to the sea.
- Requests that infrastructure (roads and traffic management; public transport; drainage and water services; schools, healthcare and community facilities) and the village core are delivered first prior to housing being permitted. Submission is of the opinion that without additional infrastructure, development will lead to significant strain on local services and reduce the quality of life for current and future residents.
- Objects to proposed bus gate that would limit access to local heritage sites such as Old Connaught House. Requests that local access is retained and extended to Old Connaught House. Objects to the one-way system on the northbound site of Old Connaught House as it disrupts connectivity and accessibility for residents and visitors. Suggests the proposed bus gate is shifted onto the new road so that local, quick access to Bray and Enniskerry is retained for residents and that traffic to the proposed village would also be limited.
- Highlights the need for a heritage-led vision for the village which includes:
  - A small village centre with mixed-use, appropriately scaled buildings
  - Conservation-led design principles
  - Prioritising local character, community, and the environment over large-scale housing targets
- Concludes the submission requesting dlr to:
  - Significantly reduce the number of proposed housing units
  - Preserve mature trees and sea views
  - Ensure infrastructure is developed before housing
  - Protect heritage sites and design a village core in keeping with historic values
  - Oppose the bus gate and one-way system in favour of improved local access
  - Oppose the one-way system northbound of Old Connaught House

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapters 2, 4, 6, 7, 8, 9 and 11

DLR Submission No: <b>B0035</b>	Person: <b>Bray Emmets GAA Club</b>	Organisation: <b>Bray Emmets GAA Club</b>
<p><b>Summary of Submission / Observation:</b></p> <ul style="list-style-type: none"> <li>Expresses disappointment regarding a lack of direct engagement between the Bray Emmets sports club and the Planning Authority during the preparation of the Draft Local Area Plan (LAP) and requests a meeting immediately. Indicates previous successful engagement with area developers and TII.</li> <li>Outlines the purpose of the sporting club, membership details and the role of organization in supporting <i>other users</i> i.e. sporting clubs especially GAA clubs, primary and secondary schools, third level organisations, community groups, and local initiatives in the environs of Bray, which includes North Wicklow, Dun Laoghaire-Rathdown (DLR) and South Dublin.</li> <li>Describes the population demographics of Bray and the future population projections for the area. Highlights the potential of approximately 50,000 users accessing the sporting club in the future given the proposed developments to be delivered in Bray, Shankill, Rathmichael and Old Conna and the existing community currently served by the organisation. Emphasises the role of the sporting club in the community and the need to expand facilities to meet future demand.</li> <li>Reiterates the importance of the sports facilities to Bray residents as well as highlighting use of facilities by clubs and visitors in neighbouring areas. Acknowledges a full-capacity operation by the club and states plans to develop access and improve support for members and other users.</li> <li>Provides a detailed description of the sporting club's facilities and additional events hosted within the clubhouse either in partnership with the club or through collaborative efforts including vulnerable groups. Notes intention to align with the multi-sport route in line with the National Sporting Policy. Concludes with a recognition of the club's access supporting jobs, tourism and providing economic injections to DLR and its neighbouring areas.</li> <li>States that the club grounds have been properly identified as a public green space within the DLR LAP area and reiterates the provision of a vital service to a larger constituency beyond the Draft LAP area regarding access to the facilities. Contrasts access to the organisation's facilities with St. Gerard's School (also identified as a green space), which remains largely inaccessible to the public as it is a private institution.</li> <li>Highlights long-term implementation plans to address the increasing demand for access to the club and broaden partnerships with other sports and details key features such as: <ul style="list-style-type: none"> <li>Upgrading the current walking track to allow inclusion of a full running track</li> <li>Upgraded LED floodlighting, potentially powered by solar energy</li> <li>Construction of a multi-sports hall with a gym, training space, and capacity for 400–500 guests</li> <li>Improved stand facilities to host larger sporting, cultural, and community events</li> <li>Expansion of clubhouse facilities to sustain club growth and community partnerships and to offer commercial potential.</li> </ul> </li> <li>Welcomes new housing as a response to demand but believes commensurate growth in recreational infrastructure should align with the new housing planning stage.</li> <li>Objects to the absence of emphasis of the club's infrastructure and proposals within the Draft LAP and supporting studies and highlights how this absence hampers the organisation's ability to address the amenity needs of current and</li> </ul>		

future users. Cites concerns with premature proposed development noting that infrastructure will be delivered following residential developments presenting a risk of creating a detached community that could result in social disorder.

- Addresses the removal of a vital access point proposed in the Draft Plan that would leave the club landlocked and emphasises that the proposed single new entrance is insufficient based on the required scale of access needed given the club's existing user base and growth for its future user base. Contrasts the club's access with St. Gerard's School (includes two access points) despite serving less of the population. Cites concerns with congestion and the potential for this to worsen under the LAP's proposed one-way system and increased compromise regarding safety for individuals who cycle, walk or are wheeled to the club. Suggests an alternative resulting in the expansion of the current club entrance and the relocation of an alternate exit following agreement from relevant parties.
- Cites concerns regarding the proximity of new roads, the Luas line, proposed high-rise apartments on the western boundary of the club and the potential for noise, privacy and overshadowing impacts on the club's grounds. Submission is of the opinion that the proposed alignment of the Luas is not physically possible due to incline levels and emphasises the need to relocate the Luas line and road to an alternate location. Raises issue with the proposed severance of the site from adjacent land given it would prevent the club from serving the community of existing users and the necessary growth of the club's footprint.
- Recommends a plan to rezone the land adjacent to the club for sports/recreational or community use allowing the club room to expand, increase number of pitches and playing areas and improve the integration of surrounding lands into the club's existing complex ensuring increased safety and efficiency, where possible. Additional benefits highlighted include the reconfiguration of the Draft LAP to allow unzoned land to be zoned as residential to compensate for any loss to the area's developers and proposes residential zoning around Jubilee Hall to integrate the structure as a community feature.
- Notes the N11/M11 corridor proposal would result in a 10% reduction of club grounds and remove the primary access point. Requests a second entrance to be included in the proposed transport plans to mitigate loss to N11/M11 corridor. Emphasises the lack of acknowledgement of this proposal's impact on the club in the Draft LAP and the absence of offers for any form of compensation. Submission is of the opinion that these elements of the plan are contrary to national plans and policies concerning transportation and sport.
- Highlights the strain Bray's transport access is currently under and how these issues will worsen following the removal of Herbert Road access due to the integration of the new bus corridor. Requests the undertaking of a comprehensive area-based traffic study to better inform the proposed development as well as engagement with a wider stakeholder base to improve outcomes for the authorities and the communities served.
- Submits prior engagement with Transport Infrastructure Ireland (TII) and highlights the organisation's willingness to engage with a wide stakeholder base including institutions like the sporting club regarding Luas alignment reconfiguration to best serve populations along proposed routes. States interest in collaborating with DLR and others in a similar fashion regarding alignment at Old Conna with the sporting club to promote best outcomes for all impacted.
- Summarises specific proposals for consideration outlined in the submission including:
  - Retain dual access points to and from the club grounds.
  - Relocate the proposed Luas line and road to allow rezoning and further expansion of club facilities.
  - Extend the strategic park eastward to accommodate at least one full-size and one junior GAA pitch in an integrated arrangement.

<ul style="list-style-type: none"> <li>o Relocate Strategic Infrastructure (substation) to allow conversion of current lands into recreational areas.</li> <li>o Authorise Bray Emmets (and its community of users) to maintain and control the area designated as the Active Park and Schools area to maximise use of the facilities for multi-sports use.</li> <li>o Include safe cycling and pedestrian corridors and ensure adequate parking remains for school visits, visiting teams, and large event days.</li> <li>o Set out a statement of common ground which incorporates the main requirements of Bray Emmets, developers, TII, NTA and other users to allow stakeholders to work together to support progress of a more suitable LAP and deliver crucial housing needs.</li> <li>o Enable delivery of crucial services to the club including drainage, water supply, power, broadband and appropriate transport systems ahead of planned developments.</li> </ul> <ul style="list-style-type: none"> <li>• Concludes that key concerns and suggestions within submission are not exhaustive and that the mission of the sporting club aligns with DLR's stated goals and national sporting policy: i.e. to foster healthy, vibrant, and sustainable communities. Recognises the club's commitment to inclusive participation in sport and acting as cultural and social anchor for Bray and its surrounding areas. Welcomes discussions about partnership and garnering support for all existing club partners and how to develop Old Connaught appropriately.</li> <li>• Includes maps referencing key concerns and suggestions, proposed 3-D renderings and layout of the club's future community sports hall.</li> </ul>
<p><b>Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):</b></p> <p>Chapters 1, 4, 6, 8, 10, 11 and Other Issues</p>

<b>DLR Submission No: B0036</b>	<b>Person: Marie O'Donnell</b>	<b>Organisation:</b>
<p><b>Summary of Submission / Observation:</b></p> <ul style="list-style-type: none"> <li>• The submission raises concerns regarding traffic and road infrastructure proposals in the Draft LAP.</li> <li>• Notes the proposed level of development will increase traffic in the congested local network without the proposed strategic infrastructure upgrades around key access points to the N11 which will burden residents, commuters and schools.</li> <li>• The submission states that any development must be progressed in parallel with Junction 5 upgrade featured in the N11/M11 Junction 4 to Junction 14 Improvement Scheme. This will allow connectivity between Old Connaught, the N11, and the Dublin Road.</li> <li>• The submission requests that Thornhill Road be upgraded where it is narrow to ensure increased capacity and improved connectivity to the N11 via Junction 6.</li> <li>• The submission requests that the Draft LAP's traffic management plan should aim to reduce signalised junctions and improve public transport options while maintaining a car friendly road network.</li> <li>• The submission notes that there is a large catchment area for St. Gerard's School which includes County Wicklow and South Dublin. Car transport is currently essential for those in this wider catchment area and any increase in congestion is a safety concern.</li> </ul>		
<p><b>Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):</b></p> <p>Chapter 6</p>		

<b>DLR Submission No: B0037</b>	<b>Person: Mary McNamara</b>	<b>Organisation:</b>
<b>Summary of Submission / Observation:</b>		



- Cites concerns about worsening flooding in the area due to the potential increased surface water runoff resulting from the implementation of hard surfaces (roads, roofs, paths) in conjunction with new developments.
- Enquires about surface water management, whether of a flood risk assessment has been completed for the area and the inclusion of Sustainable Drainage System (SuDs) as part of infrastructure.
- Cites concerns about development creating noise, air pollution and vibration alongside traffic disruptions and the potential to lead towards damage and disturbance.
- Enquires about mitigation measures during construction periods, noise level monitoring and compensation/repairs for homes affected by construction.
- Enquires about the accountability for contractors, who to contact during disruptions and what to do when working hours are breached. Requests that a dedicated liaison or communication channel be dedicated for residents during works (e.g. an assigned dlr officer or hotline).
- Enquires about assessment regarding the impact of population increases on local schools, GP practices, or emergency services.
- Enquires about the review of social infrastructure (education, health, childcare) in tandem with development. Notes that Shankill and Bray services are already under pressure.
- Enquires about plans to undertake environmental or ecological impact assessment and replace green space taken if development encroaches on green areas or mature trees.
- Enquires what measures are being implemented to protect or offset the loss of biodiversity and the existence of a tree protection plan or replanting strategy.
- Enquire about safety and accessibility to bus stops, Luas/BRT plans and cycleways via the road and footbridge infrastructure link. Notes that development should reduce car dependency and not increase it.
- Enquires about the undertaking of transport modelling and if transport routes or service frequencies will be adapted to support new plan.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapters 5, 6, 7, 10 and Other Issues

DLR Submission No: B0038	Person: Noreen Keane	Organisation:
<p><b>Summary of Submission / Observation:</b></p> <ul style="list-style-type: none"> <li>• Submission is of the opinion that the building heights of 4 storeys plus setback referenced in Section 4.3.3 fronting on either side of a section of Thornhill Road on Map 4.3 will cause a claustrophobic tunnel on the narrow road and suggests that the building heights should be 2- 3 stories.</li> <li>• Requests the maintenance of sections of old walls, hedgerows, and mature deciduous trees to retain the protected vistas from Ballyman looking south over to Bray Head, both Sugarloaves, and Carrigoona.</li> <li>• Highlights that apartment brickwork should not look like urban red-brick.</li> <li>• Notes that new access to M11 from Old Connaught Avenue be in place before development begins.</li> <li>• Enquires about how to drive to Bray centre with Old Connaught proposal to be closed off to car traffic. Acknowledges routes such as: <ul style="list-style-type: none"> <li>◦ Via proposed new M11 bridge and then coming to a halt at Wilton roundabout</li> <li>◦ Via lines of cars funnelled down narrow Thornhill Road</li> </ul> </li> <li>• Requests all older houses on Thornhill Road have their septic tanks linked into new mains drainage serving new houses on the village end of the road.</li> <li>• Supports the need for commencement of the new link from Old Connaught Avenue onto the M11 prior to the beginning of Phase A development.</li> </ul>		



- Concludes with a positive comment about what seems to be a very well-considered Draft LAP.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapters 4, 6, 7, 9, 10 and 11

<b>DLR Submission No: B0039</b>	<b>Person: Phillip O'Donnell</b>	<b>Organisation:</b>
<p><b>Summary of Submission / Observation:</b></p> <ul style="list-style-type: none"> <li>• The submission raises concern regarding traffic and road infrastructure proposals in the Draft LAP and resultant traffic congestion in the Draft LAP lands.</li> <li>• Notes the proposed level of development will increase traffic in the congested local network without the proposed strategic infrastructure upgrades around key access points to the N11 which will burden residents, commuters and schools.</li> <li>• The submission states that any development must be progressed in parallel with Junction 5 upgrade featured in the N11/M11 Junction 4 to Junction 14 Improvement Scheme. This will allow connectivity between Old Connaught, the N11, and the Dublin Road.</li> <li>• The submission requests that Thornhill Road be upgraded where it is narrow to ensure increased capacity and improved connectivity to the N11 via Junction 6.</li> <li>• The submission requests that the Draft LAP's traffic management plan should aim to reduce signalised junctions and improve public transport options while maintaining a car friendly road network.</li> <li>• The submission notes that there is a large catchment area for St. Gerard's School which includes County Wicklow and South Dublin. Car transport is currently essential for those in this wider catchment area and any increase in congestion is a safety concern.</li> </ul>		
<p><b>Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):</b></p> <p>Chapter 6</p>		

<b>DLR Submission No: B0040</b>	<b>Person: Lauren Tuite</b>	<b>Organisation: Dún Laoghaire Rathdown County Council</b>
<p><b>Summary of Submission / Observation:</b></p> <ul style="list-style-type: none"> <li>• Welcomes the Draft Old Connaught LAP 2025's integration of sustainable transport planning into the vision for the area's development and aim to create a well-connected, environmentally responsible community.</li> <li>• Notes that the Draft LAP's reliance on the LUAS extension for sustainable development: <ul style="list-style-type: none"> <li>◦ Prioritise LUAS infrastructure to ensure the LUAS extension is operational before commencing housing development to provide residents with immediate access to sustainable transport options.</li> <li>◦ Tie the approval of housing projects to the progress of LUAS infrastructure development to ensure alignment between residential growth and transport capacity.</li> <li>◦ Developing a clear and detailed phasing plan outlining the sequence of infrastructure and housing developments with provisions for stakeholders via a roadmap for the area's growth.</li> </ul> </li> <li>• Concludes with a comment about how the implementation of these requirements will allow a balanced and sustainable development that aligns with the LAP's objectives and ensures the well-being of future residents of Old Connaught.</li> </ul>		
<p><b>Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):</b></p> <p>Chapters 4 and 11</p>		

<b>DLR Submission No: B0041</b>	<b>Person: No Name Given</b>	<b>Organisation:</b>
<b>Summary of Submission / Observation:</b> <ul style="list-style-type: none"> <li>The submission notes concern about the road closure with access to the local school on Thornhill Road, as at present they have a short drive to the local school and their family in the area via Ferndale Road and Thornhill Road.</li> <li>The submission claims the proposed transport strategy would elongate their journeys.</li> <li>Then submission strongly disagrees with the plan to close and change the road.</li> </ul>		
<b>Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):</b> Chapter 6		

<b>DLR Submission No: B0042</b>	<b>Person: Ivo Lemahieu</b>	<b>Organisation:</b>
<b>Summary of Submission / Observation:</b> <ul style="list-style-type: none"> <li>The submission expresses sadness to see how beautiful green landscapes are destroyed to build houses and high apartment blocks over two storeys.</li> <li>The submission notes that they will lose their views over existing fields and a likely loss of their views to the sea.</li> <li>The submission expresses a lack of belief and understanding over the proposals to change a portion of Ferndale Road to one-way flow.</li> <li>The submission notes that, when leaving home on Ferndale Road, they mostly turn south against the flow of the proposed one-way. It notes the consequences of such a measure would increase car pollution, carbon emissions, increased traffic congestion and an increased risk of accidents for residents.</li> </ul>		
<b>Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):</b> Chapters 4, 6 and 7		

<b>DLR Submission No: B0043</b>	<b>Person: Office of Public Works (OPW)</b>	<b>Organisation: Office of Public Works (OPW)</b>
<b>Summary of Submission / Observation:</b> <ul style="list-style-type: none"> <li>The submission clarifies that it is made specifically in relation to flood risk management.</li> <li>The submission welcomes the preparation of an SFRA in the plan making process and the acknowledgement of the relevant guidelines.</li> <li>The submission welcomes the objectives OCLAP 60 and OCLAP 61 of the LAP in relation to flood risk management.</li> <li>Regarding Flood Zone Mapping, the submission welcomes the fact the local authority conducted updated flood risk assessments and acknowledges that this has produced smaller flood zone extents than the National CFRAM maps.</li> <li>The submission acknowledges that the Central Character Area Site Development Framework in the Draft LAP seems to have avoided what flood zones remain in the area.</li> <li>The submission requests clarity on whether the local authority means "SFRA" or "SSFRA" in policy OCLAP 60.</li> <li>The submission welcomes OCLAP 57.</li> <li>The submission notes that any damage to subsurface drainage infrastructure, as highlighted in the SFRA, should be rectified.</li> <li>The submission welcomes the inclusion of proposed attenuation pond locations in the Draft LAP but notes these should be included or referenced in the SFRA.</li> <li>The submission notes the attenuation pond, proposed for the central character area, could be used to deal with the current pluvial risks identified in the SFRA.</li> </ul>		

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapter 10 and Appendix 1

DLR Submission No: <u>B0044</u>	Person: Eastern and Midland Regional Assembly (EMRA)	Organisation: Eastern and Midland Regional Assembly (EMRA)
<p><b>Summary of Submission / Observation:</b></p> <ul style="list-style-type: none"> <li>The submission outlines its legislative context including the function of the Eastern and Midland Regional Assembly (EMRA). It also outlines the legislative requirements of LAP's and specifically the Old Connaught LAP.</li> <li>The submission outlines the form, function and context of its Regional Spatial and Economic Strategy (RSES) and its relevance to Old Connaught and Bray. It also specifies its objectives relevant to Bray. The submission then welcomes the Draft LAP's acknowledgement of Old Connaught's inclusion in these objectives.</li> <li>The submission acknowledges the extensive work by the local authority in producing the Draft LAP, as well as the approach taken to incorporate RSES compliant objectives.</li> <li>The submission notes that the structure of the Draft LAP aligns with the RSES' three key principles and sixteen Regional Strategic Outcomes (RSO's).</li> <li>The submission summarises Chapter 1 of the Draft LAP and notes compliance with Local Area Plan Guidelines for Planning Authorities 2013 and the Development Plans Guidelines for Planning Authorities 2022.</li> <li>The submission welcomes the Draft LAP's reference to its identification as a strategic location adjacent to the RSES key town of Bray and its inclusion within the Dublin Metropolitan Area Strategic Plan (MASP). They further welcome the extensive reference to the Luas Green Line extension within the Draft LAP.</li> <li>The submission notes the degree to which the land in question is unserviced is noted as a 'weakness' in the Draft LAP, as well as the 'challenges' of ensuring the delivery of sustainable transport and neighbourhood infrastructure in tandem with the delivery of housing.</li> <li>The submission notes the Draft LAP's compliance with the dlr CDP 2022-2028, particularly in relation to residential development objectives and Core Strategy population and housing targets and welcomes the references to the location of the Draft LAP within the Dublin MASP area and Old Connaught's relationship with the development of Bray.</li> <li>The submission notes Bray's important regional role for service provision and welcomes recognition within the Draft LAP of Old Connaught's role as part of the westward expansion of Bray, its location within the North-South Corridor (DART) making Old Connaught part of the strategic development corridor of the MASP.</li> <li>The submission acknowledges policy OCLAP1 and its compliance with Climate Action, a key principle of the RSES.</li> <li>The submission acknowledges the Draft LAP's vision and its reference to "healthy placemaking", a RSES key principle.</li> <li>The submission summarises and acknowledges Section 4.2 of the Draft LAP and its plan-led approach to development via the Site Development Frameworks and objective SDF1. It welcomes the reference in the Draft LAP to 'Healthy Placemaking' as one of the three key principles underpinning the RSES.</li> <li>The submission summarises Chapter 5 of the Draft LAP and welcomes the goal of creating a sustainable urban village, drawing attention to Section 9.4 of the RSES.</li> <li>The submission welcomes the Draft LAP's recognition of Bray as an employment location as it is in compliance with RPO 4.38 of the RSES.</li> <li>In relation to transport and movement, the submission states that the final LAP should consider the sustainability of all elements of the proposed transport network, including vehicular circulation and transport infrastructure, to ensure</li> </ul>		

efficient movement within the LAP area, as well as linkages to the M11 (north and south) and the Key Town of Bray to minimise potential congestion.

- Regarding public transport, the submission notes policy OCLAP 27 and table 5.1 of the Draft LAP, the lack of current public transport infrastructure and the need for future linkages for the LAP lands. It also notes the Draft LAP's compliance with public transport related RSES objectives such as RPO 5.2 and 5.3. The submission notes that the only transport-linked phasing in the Draft LAP relates to the provision of road access.
- The submission considers that the term 'potential' for the Luas green line extension should not be used and recommends that the Draft LAP recognises that the Luas extension is essential to the successful implementation of the LAP and that the Luas extension is included in the phasing plan in the Draft LAP, with the delivery of the Luas within the 2031-2036 timeframe so that new residents can benefit from multiple positive individual and societal benefits.
- Regarding infrastructure delivery, the submission welcomes the Draft LAP's policy OCLAP28 compliance with RPO 5.1.
- The submission welcomes the Draft Plan's compliance with RPO 4.41 via Chapter 6.
- The submission welcomes the Draft Plan's emphasis on active travel but suggests the inclusion of walking and cycling links in the phasing plan.
- The submission notes that the preparation of an ABTA for the Draft Plan aligns with RPO 8.6 but states that this document should be published separately and alongside the Draft Plan.
- The submission encourages continued engagement by Dún Laoghaire-Rathdown County Council with the Pathfinder 27 Project, the Smart and Sustainable Mobility Accelerator Programme (SSMA).
- The submission summarises some content of Chapter 7 of the Draft Plan and welcomes policy OCLAP38 and further policy relating to Groundwater Dependent Terrestrial Ecosystems.
- The submission further welcomes policy OCLAP36 and Figure 7.1. However, it notes possible improvements via the inclusion of RSES guidance on how Green and Blue Infrastructure features can be integrated into the new proposals.
- The submission highlights resources that EMRA has acquired via the Interreg Europe PROGRESS project, which may be of use to the local authority.
- Regarding ecosystem services, the submission highlights a pilot mapping approach undertaken in co-ordination with Dún Laoghaire-Rathdown County Council and others. It directs the local authority to the findings of this Pilot Action and suggests these can be included into the Draft LAP.
- The submission welcomes the plan led approach to the provision of a network of nine strategic parks and open spaces to support the sustainable development of Old Connaught indicated in Chapter 8 and notes its compliance with the guiding principles of healthy placemaking and supports RPOs 9.14-9.17 of the RSES.
- The submission notes the heritage value contained within the Draft LAP lands and notes that policies OCLAP 47 and 48 of the Draft LAP are consistent with section 9.27 of the RSES.
- The submission welcomes policies OCLAP50, OCLAP51, and OCLAP52, and further notes that objectives HC1 and HC2 align with RPO 9.30 of the RSES.
- The submission notes the preparation of an Infrastructure Capacity Assessment Study (ICAS) and how this informed the appropriate zoning of land in the Draft Plan to facilitate plan-led development.
- The submission acknowledges information in the Draft Plan that additional significant water infrastructure will be not required to enable development in the area.
- The submission notes wastewater restrictions currently in the area and welcomes policy OCLAP 56.
- The submission requests that any wastewater upgrades be done in alignment with RPO 10.3.

- The submission welcomes Section 10.4 of the Draft Plan in relation to surface water drainage and ground water. It suggests this section be further strengthened by making reference to the guiding principles for Sustainable Drainage Systems as set out in Section 10.2 of the RSES.
- The submission highlights that the Draft Plan should take note of 'Nature Based Management of Urban Rainwater and Urban Surface Water Discharges – A National Strategy.'
- The submission notes that the preparation of a SFRA in the Draft Plan aligns with RPO 7.12.
- The submission also notes the preparation of an SEA and NIR and welcomes the fact that the Draft Plan has integrated their findings.
- The submission recommends that the Local Authority takes opportunities to enhance biodiversity and amenities, including where flood risk management measures are planned, in line with RPOs 7.14 and 7.15 of the RSES.
- The submission notes and welcomes the detail of the phasing strategy of the Draft Plan which provides greater clarity on the short-, medium- and long-term development strategy for the entire Draft Plan area and notes its alignment with RPO 4.37. It is recommended that the Draft LAP recognises that the Luas extension is essential to the successful implementation of the Draft LAP and that the Luas extension is included in the phasing plan of the Draft LAP, with the delivery of the Luas within the 2031-2036 timeframe. Furthermore, it is recommended that the integration of walking and cycling links, especially to public transport, schools and other local amenities, should be considered for inclusion in the phasing plan provided for in the Draft LAP.
- The submission welcomes the detail of Chapter 12 of the Draft Plan and directs the local authority to the Regional Development Monitor (RDM) for additional support.
- The submission notes that status and findings of both the Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) in the Draft Plan and how they have been integrated.

#### Recommendations:

- The submission recommends that Section 4 of the Draft LAP should make reference to Healthy Placemaking RPOs 9.10, 9.12 and 9.13, and Figure 9.2 Healthy Placemaking Strategy of the RSES.
- The submission recommends that Chapter 5, Section 5.2 be strengthened by referring to the Healthy Placemaking Strategy (Figure 9.2) of the RSES to underpin the ambitions of the Draft Plan on integrated land use and transportation in the creation of healthy and attractive places.
- The submission recommends that Chapter 6 of the Draft Plan be strengthened by considering the sustainability and efficiency of all elements of the proposed transport network, including vehicular circulation and transport infrastructure, and recognising that the Luas Green Line extension, as referred to in Figure 5.4 of the RSES, is essential to the successful implementation of the Draft LAP and that the Luas Green Line extension is included in the phasing plan in the Draft LAP.
- The submission recommends that Figure 7.4 Climate Strategy of the RSES should be referred to in the Draft LAP.
- The submission recommends the Draft LAP should make reference to RPO's 7.14 and 7.15 of the RSES regarding flood risk management and should refer to the guiding principles for Sustainable Drainage Systems as set out in Section 10.2 of the RSES.
- The submission recommends that Chapter 8 of the Draft LAP be strengthened by referring to the 'Guiding Principles in the preparation of Green Infrastructure Strategies' in Section 7.7 of the RSES.

#### Observations:

- The submission observes that during the implementation of the Draft LAP, the local authority should work to ensure that sustainable transport and neighbourhood infrastructure are delivered in tandem with the delivery of housing.
- The submission considers that the integration of walking and cycling links, especially to public transport, schools and other local amenities, should be considered for inclusion in the phasing plan provided for in the Draft LAP.
- The submission observes that the Old Connaught Area Based Transport Assessment (OCABTA) which has informed the preparation of the Draft LAP should be published as a separate document and included as part of the appendices of the Draft LAP.
- The submission observes that the local authority should be aware of the recent publication of 'Nature Based Management of Urban Rainwater and Urban Surface Water Discharges – A National Strategy' by the Department of Housing, Local Government and Heritage in May 2024.
- The submission observes that the local authority should be aware of their involvement in, and the findings of, the PROGRESS report and that this methodology approach should be incorporated into the implementation of green infrastructure and biodiversity policies in the Draft LAP.

**Conclusion:**

- The submission concludes that the Draft Plan is generally consistent with the Regional Spatial and Economic Strategy (RSES) 2019-2031 and would be further enhanced by addressing the submission's recommendations.
- The submission concludes by informing the local authority that the officials of EMRA are available to discuss any matters arising from the submission and welcome further engagement.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapters 2, 3, 4, 5, 6, 7, 11, Appendix 1 and Other Issues

<b>DLR Submission No: <u>B0045</u></b>	<b>Person: Ferndale Court Volunteer Board of Directors</b>	<b>Organisation: Ferndale Court Volunteer Board of Directors</b>
<p><b>Summary of Submission / Observation:</b></p> <ul style="list-style-type: none"> <li>• The submission outlines its representation of the queries and concerns of the residents of Ferndale Court.</li> <li>• The submission requests clarity on who will be carrying out construction work in the area.</li> <li>• The submission requests that a parking agreement be put in place during construction work which would ensure Allies River Road is not used for on-street parking of construction vehicles. It cites the negative impacts on residents if this was allowed to occur.</li> <li>• The submission queries if the proposed footbridge at Allies River Road will connect to the other side of Allies River Road, and what transport modes and timelines are being considered for this project.</li> <li>• The submission notes the Draft Plan's indication of an expansion of Traveler Accommodation at Walcot. It raises concerns of an overconcentration of such facilities in a single locality, which would lead to negative impacts on the area. It asks for this to be reconsidered.</li> <li>• The submission requests that the proposed link roads around the property be completed before the commencement of major construction works, to reduce disruption for residents.</li> <li>• The submission requests that no development works relating to the future Rathmichael LAP commence while works under the Old Connaught LAP are ongoing. The submission acknowledges that concurrent development could occur</li> </ul>		

<p>if full, and clearly accessible, routes are in place to support safe traffic flow and emergency access for residents.</p> <ul style="list-style-type: none"> <li>• The submission requests that the property and other properties on Old Connaught Avenue be considered for connection under any new wastewater infrastructure schemes in the area to reduce environmental impacts and maintenance burdens on residents.</li> <li>• The submission queries if a full flood risk assessment be carried out in relation to surface water and drainage and will surface water be managed. The submission requests details of any proposed Sustainable Drainage Systems (SuDS).</li> <li>• The submission requests further information on monitoring systems of construction in relation to dust, noise, and vibrations. It also asks for information on working hours during construction and accountability for any breaches detected.</li> <li>• The submission asks if any dedicated personnel or dlr liaison will be assigned to manage resident queries and complaints regarding construction and contractor oversight.</li> <li>• The submission asks if any audit has taken place on local service capacity and the impact of such from new development.</li> <li>• The submission queries about what measures will be taken to protect existing trees and wildlife and if any green areas lost to development are to be replaced or enhanced.</li> <li>• The submission asks if new infrastructure links to public transport routes will include safe pedestrian/cycle access to reduce car dependency.</li> <li>• The submissions asks if transport modelling has been carried out.</li> <li>• The submission encourages engagement from the local authority as the LAP progresses.</li> </ul>
<p><b>Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):</b>  Chapters 5, 6, 7, 8, 10, 11 and Other Issues</p>

<b>DLR Submission No: B0046</b>	<b>Person: Joseph Breslin</b>	<b>Organisation:</b>
<p><b>Summary of Submission / Observation:</b></p> <ul style="list-style-type: none"> <li>• The submission notes concern of the negative impacts associated with increasing motorised traffic without sufficient traffic infrastructure, and its impact on the already heavily congested traffic conditions in the Bray area.</li> <li>• The submission notes concern with the phasing of the Draft Plan in relation to an initial 400 homes being built without additional road/traffic infrastructure.</li> <li>• The submission states this phasing will put unacceptable further traffic pressures on the already busy Old Connaught Avenue/R761 junction, and that any plan for the area should include junction improvements here.</li> <li>• The submission claims the Draft Plan will result in an increase in rat running down Thornhill Road to access the M11 at the Fassaroe Lane/N11 junction, increasing safety risks for active travel users.</li> <li>• The submission therefore requests that Thornhill Road is either widened, or has access restricted as part of the plan.</li> <li>• The submission states that the increased population of the Draft Plan area and in Shanganagh will overwhelm the existing Junction 5 of the M11, and that new on/off access of the N11 at this junction is required.</li> </ul>		
<p><b>Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):</b>  Chapters 6 and 11</p>		

<b>DLR Submission No: B0047</b>	<b>Person: Uisce Éireann</b>	<b>Organisation: Uisce Éireann</b>
<b>Summary of Submission / Observation:</b>		



- The submission welcomes the opportunity to provide comments on the Draft Plan.
- The submission notes Old Connaught's location within the Greater Dublin Area (GDA) Water Resource Zone. It further notes that status of the GDA since the issues paper was published has changed to amber, indicating that it is constrained.
- The submission notes such constraints are an opportunity to develop water efficient or water neutral housing in the Draft LAP area.
- The submission notes the organisation's annual publication of Water Supply Capacity Registers per county.
- The submission notes within the Draft Plan that the strategic watermain network and Ballyman Reservoir are in place and adequate to serve the area beyond the LAP period.
- The submission notes the lack of a public sewer network in the area and notes the creation of one will be developer driven.
- The submission notes a site and route selection report is required for a strategic pumping station and rising main to cross the M11 and connect into the existing network.
- The submission states a strategic pumping station is preferable and as indicated in the Draft Plan an interim solution may be possible to open up a first phase of housing. It also notes the downstream network has capacity to take this first phase.
- The submission notes however that longer-term scenario to include all strategic reserve, will need an impact assessment on the downstream networks and that Uisce Éireann and the local authority will continue to work together to develop solutions.
- The submission welcomes the Draft Plan's support of SuDS and green and blue infrastructure enhancement. It notes its alignment with the NPF and the benefits from such an approach.
- The submission recommends that under Policy OCLAP 57 the use of the hierarchy of discharge outlined in the recently published guidance document "Implementation of Urban Nature-based Solutions: Guidance Document for Planners, Developers and Developer Agents" to complement the approach to surface water management set out in the Draft Plan.
- The submission provides further information links and guidance for new connections to Uisce Éireann networks.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapter 10

<b>DLR Submission No: B0048</b>	<b>Person: Cedric Uhlar</b>	<b>Organisation:</b>
<b>Summary of Submission / Observation:</b> <ul style="list-style-type: none"> <li>• The submission notes appreciation for the plan and provides context of their links to the area for the last 40 years and the location of their property at Thornhill Road.</li> <li>• The submission specifies view loss, tree retention, and traffic congestion as their primary concerns.</li> <li>• Regarding trees and views, the submission highlights an area of the Draft Plan's site development framework where they would like to see hedgerow retention and view protection. It highlights oak trees in the makeup of this hedgerow and states the hedgerows are frequented by greater spotted woodpeckers, bats, foxes, hedgehogs, and pheasants.</li> <li>• The submission further highlights a specific row of 2-3 storey structures in the framework and requests they be lowered to 1-2 storey to achieve the goals of tree/hedgerow retention and view protection. The submission notes the negative impact of tall structures on views and daylight.</li> </ul>		



- The submission notes further setbacks from the existing hedgerows will protect trees and will allow easier construction of homes with larger back gardens.
- The submission welcomes the Draft Plan's focus on preserving nature, biodiversity, heritage, and views.
- Regarding road safety, the submission raises concerns about the safety of having the property facing directly onto a proposed T-Junction. The submission requests traffic calming measure to be deployed for cars approaching this T-Junction. The submission reiterates the importance of such interventions as softer measures currently deployed on Thornhill Road have had a negligible impact on road speeds.
- The submission also asks if it is possible to move the proposed T-Junction and associated road south to interact more directly with Thornhill gateway. It notes that this would increase safety also protect a piece of hedgerow on the western edge of Thornhill Road.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapters 4 and 6

<b>DLR Submission No: B0049</b>	<b>Person: Anne Healy</b>	<b>Organisation:</b>
<b>Summary of Submission / Observation:</b> <ul style="list-style-type: none"> <li>• The submission notes that local authority staff were very helpful during drop-in events and expresses gratitude for such.</li> <li>• Regarding Section 1.5.4 of the Draft Plan, the submission notes that recent developer acquisitions in the area has reduced the population due to houses becoming vacant.</li> <li>• Regarding Section 4.2 of the Draft Plan, the submission criticises the location of the proposed public open spaces and claims they do not fit the description in the Draft Plan of a "connected network of strategic public open spaces". It criticises specifically the location of the village green, stating that it would have no connection to the village centre and little passive overlooking.</li> <li>• The submission criticises the location choice of the proposed neighbourhood centre. The criticism centres around the suggestion that the location chosen is at the periphery of the village core and has too many roads circulating around it.</li> <li>• The submission queries why it was not considered to locate the Neighbourhood Centre around a proposed open space, utilising existing buildings.</li> <li>• The submission states that if the Neighbourhood Centre is built before the introduction of the bus gates, it would produce unsafe road conditions for the area in the interim.</li> <li>• The submission claims that Phase A: sub phase 1 conflicts with specific text in sections 5.1 and 11.1 of the Draft Plan. It notes that the phasing mentioned only pertains to wastewater delivery and no services provision for the new households.</li> <li>• The submission notes that only St. Kieran's Special School has been identified as sustainable neighbourhood infrastructure (SNI) as St. Gerard's School is private. It expresses concerns that the 10-minute neighbourhood goals of the Draft Plan can be achieved without further provision and zoning for SNI.</li> <li>• The submission notes that the neighbourhood centre would likely not be commenced until 2034 due to the wording of the phasing table in the Draft Plan.</li> <li>• The submission claims that the Draft Plan's Area Based Transport Assessment (ABTA), and Infrastructure Capacity Assessment Study (ICAS) did not take into consideration the existing demand. It specifies that only current population figures within the Draft LAP area were taken into consideration for traffic models. It states this is inadequate as most of the traffic in the area consists of people driving into Old Connaught from elsewhere.</li> <li>• The submission states that the proposed road network in the Draft Plan does not take into consideration traffic movements to and from Bray Emmett's GAA Club</li> </ul>		

and St. Gerard's School and recommends the use of Automatic Traffic Counters to establish such.

- The submission claims that the only development identified in the Draft Plan is two complexes of four-storey plus setback apartments. It states such development would block views of the Sugarloaf.
- The submission highlights the risk of allowing an initial 450 units to be built without the wider supporting infrastructure specified after Phase A: sub-phase 1. This risk arises from the possibility that, due to uncertain times, commencement may cease after this sub-phase and not re-commence for a long period afterwards. Such a scenario would leave the new and existing residents without sufficient transport infrastructure, causing increased congestion issues.
- Submission is of the opinion that inadequacies highlighted in Old Connaught (e.g. lack of facilities, roads that are not pedestrian or cycling friendly, heavy car usage etc.) will be exacerbated following the commencement of the 450 units at Phase A sub phase 1 and the increase in occupants in the area.
- The submission queries whether pluvial flooding has been taken into consideration in the Draft Plan.
- Submission is of the opinion that all existing properties connect to main sewage in the interest of the environment. Notes the assumption that this consideration would be a priority for the Planning Authority.
- References a statement made by the Office of the Planning Regulator on 6/6/2023 which expresses that, 'It is essential that the LAP includes a clear phasing strategy.... The phasing strategy should clearly set out the projected timeline for the delivery of infrastructure and associated incremental development over the period of LAP (that is year 1,2,3 etc.)'. Submission is of the opinion that the draft LAP does not include this consideration, and its inclusion would be useful.
- References a statement made by the Office of the Planning Regulator on 6/6/2023 which expresses that, 'education, childcare, social and community facilities can be easily accessed by walking or cycling from existing and proposed new residential areas'. Notes that occupants of Phase A sub phase 1 will be unable to access education facilities by walking or cycling and will instead travel by car towards the end of Old Connaught Avenue.
- Emphasises the lack of consideration in the Draft LAP regarding existing residents of Old Connaught during the plan development. Submission is of the opinion that the Draft LAP is developer-led. Recognises the need to build houses or apartments to address the housing crisis and provide homes for the increasing population.
- Submission is of the opinion that Phase A and B will take 10 years to reach the point of occupancy and during that time, existing residents will experience road closures, huge traffic congestion, and associated noise and dirt common with large construction sites. Notes that as a resident of Old Connaught Avenue that this development phase will occur similarly to Cherrywood with concerns about builder's car parks and derelict boarded up houses.
- Cites concerns regarding a scenario where Phase A sub phase 1 development commences, Phase B site clearing work/preparation would occur simultaneously and Phase A sub phase 1 would be completed but all other phases would be stalled for economic reasons. As a result, existing residents of Old Connaught would endure 300 more cars at the end of Old Connaught Avenue, there would be no main sewage and future residents of Phase A sub phase 1 developments would be reliant on cars and not receive the benefits of a 10-minute neighbourhood.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapters 1, 4, 5, 6, 7, 8, 10, 11 and Other Issues

**DLR Submission  
No: B0050**

**Person: Ballymore  
Group**

**Organisation: Ballymore Group**

**Summary of Submission / Observation:**

- The submission provides details of the land ownership in the area, a substantial tract of land which equates to approximately 37 hectares of land straddling the M11 of which approximately 30 hectares lies within the Draft LAP boundary.
- Welcomes the publication of the Draft Old Connaught Local Area Plan.
- Notes the majority of the landowners' land within the LAP boundary is zoned Green Belt and Strategic Reserve (includes a map extract with lands outlined in red and orange) and that under the Dun Laoghaire-Rathdown Development Plan 2022-2028, the Strategic Reserve lands are earmarked to accommodate approximately 1,050 residential units post 2028 in comparison to the current proposed 2,005 units identified on the zoned lands which aligns with the RSES target for expansion in Old Connaught-Fassaroe and Bray-Fassaroe.
- Acknowledges the preparation of the Draft LAP in a rapidly evolving planning context including references to the adoption of the new Planning and Development Act 2024 and upcoming commencements relevant to the LAP process in Q2 2025.
- Suggests the final Draft LAP include a section setting out the legal status of the plan following the commencement of Part 3 of the new Planning and Development Act 2024. Notes the absence of an LAP expiry date, contrary to S18(4)(a) of the Planning and Development Act 2000 and suggests an expiry date is included in the final LAP to avoid doubt and in the interest of clarity.
- Highlights Governmental approval of a Draft Revised National Planning Framework (subject to Dáil approval) which will guide national planning policy for the next 15 years. Indicates that increases in population estimates and housing targets in the Draft Revised NPF will require all Planning Authorities to increase supply of zoned land.
- Welcomes the approach in the Draft LAP to anticipate the required increase in zoned land which consists of treating lands identified as 'Strategic Reserve' in the CDP as *de facto* zoned lands so future revision to the CDP will not require the LAP to be revisited.
- Welcomes the extension of the Old Connaught Draft LAP boundary to include lands just south of Crinken Lane as Crinken Lane provides a natural boundary between Old Connaught and Rathmichael.
- Suggests the Draft LAP area be put forward to the government as Transport Oriented Development (TOD) following a review of the Draft LAP alongside the Infrastructural Capacity Assessment Study which emphasises a need for a full infrastructure build out prior to the sustainable development of Draft LAP lands. Highlights the TODs receive priority funding for infrastructure investment according to the draft revised NPF.
- Submission is of the opinion that the Old Connaught Draft LAP should consider other plans and programmes that will directly impact the plan area such as Rathmichael LAP and Bray Municipal District LAP (Fassaroe). Notes that the Rathmichael LAP is currently in the pre-draft public consultation stage and cites concerns regarding the interdependence between Old Connaught and Rathmichael which has not been fully reflected in the Draft LAP despite the commissioning of the Infrastructural Capacity Assessment Study (ICAS) which covered both Old Connaught and Rathmichael.
- Requests the pumping station location allocated to serve the southern part of the Rathmichael LAP area be indicated further south on the organisation's lands within the Old Connaught Draft LAP area, so that the northern portion of the Old Connaught LAP area can be served by it and therefore not served by the Old Connaught Avenue pumping station.
- Highlights that the build out of the pumping station and associated sewers require an early delivery of the Crinken Lane – Old Connaught Avenue link road given the gravity sewer serving most of Rathmichael will run south down Ballybride Road into the organisation's lands. Includes a map extract from the ICAS displaying proposed pumping station.

- Addresses discrepancies between ICAS recommendations and the Draft LAP specifically the indication of the proposed LUAS line. Within the ICAS, the proposed LUAS line is in the same location as the County Development Plan (CDP) but within the Draft LAP the indicative LUAS line was shifted further to the west, exiting the plan area at the Ballybride/Crinken Lane junction and suggesting the continuation of the LUAS up Ballybride Road with no explanation for the shift.
- Submission states understanding regarding the final alignment of the LUAS is subject to its own dedicated study. Suggests the location of the indicative LUAS in the Draft LAP is suboptimal and requests the indicative route in the LAP align with the route highlighted in the CDP and ICAS. Includes two extract maps (one from the CDP and the other from the Draft LAP) depicting the discrepancy in the indicative LUAS line.
- Notes the commencement of work by Wicklow County Council (WCC) on the preparation of the Bray Municipal District Local Area Plan and the submission made by dlr to that plan as well as a submission made by the Eastern and Midland Regional Authority. Highlights the housing delivery target of approximately 4,000 units and the maintenance of the target in the future Bray Municipal District LAP.
- Notes the approval of a Bus Based Park & Ride at Fassaroe by WCC via the Part 8 process and the purpose of the P&R to serve buses along N11/M11. Highlights the facilitation of motorway upgrades proposed under the N11/M11 Bus Priority Interim Scheme (BPIS) N11/M11 BPIS and the connection to the bus-based P&R measures. Provides details about where to locate information about the scheme and its 'in progress' status.
- Acknowledges the intention that the 4,000 units proposed for Fassaroe will be served by buses running along the N11/M11 and meet the needs of a population of c. 10,000 persons. Notes the N11/M11 BPIS does not propose any change to the Willford Interchange (Junction 5) with buses running along the N11/M11 corridor. Includes a figure of an extract depicting Phase 2 Preferred Option Scheme Layout.
- Identifies the N11/M11 Bus Priority measures as interim and references the Draft LAP statements about the measure (Section 6.3.1; page 57). Includes a screen capture of Figure 6.1 in the Draft LAP. Notes a statement made in Section 6.6.4 regarding Vehicular Circulation on page 62. Submission is of the opinion that clarity related to the ultimate configuration of this junction is needed. Notes difficulty with reconciling the configuration illustrated in Figure 6.1. with the proposal in the Draft LAP for a new bridge and road crossing the M11 immediately north of Junction 5 to join the R119 just north of Woodbrook College.
- Suggests that the proposed construction of the N11 overbridge remain premature during initial stages of the plan area's build out pending a final decision regarding the junction configuration. Submission is of the opinion that delaying the start of build out of zoned lands in Old Connaught on account of agreement on an optimal junction configuration would be undesirable and unnecessary.
- Suggests the prioritisation of construction of the north-south link road connecting Old Connaught Avenue with Crinken Lane as a first step towards improving access to the Old Connaught lands. Recommends that the 'Indicative LUAS Corridor' illustrated in Fig 6.13 of the Draft LAP should be a bus connection to Crinken Lane to facilitate buses crossing over Crinken Lane and joining the recently granted BusConnects Bray Corridor planning permission. Notes that lands needed to facilitate this connection are either under the ownership of Ballymore or Castlethorn and that both companies have an active interest in building out the Old Connaught LAP area. Indicates the road/busway would traverse green fields with minimal environmental impact and highlights that this suggestion would ensure high quality, high frequency public transport services that establish sustainable transport patterns for the Old Connaught lands at the outset. Provides details for the facilitation of two-way bus services:
  - Dublin to Draft LAP lands via Dublin Road (north), Crinken Lane and spine road, returning to Dublin;

- o Bray to Draft LAP lands local loop via Dublin Road (south), Old Connaught Avenue, spine road and Crinken Lane and Dublin Road;
  - o Dublin to Bray via Dublin Road (north), Crinken Lane, spine road, Old Connaught Avenue and Dublin Road (south);
  - o M11 / Fassaroe P&R to Dublin via M11 northbound off-slip at Old Connaught Avenue, Spine Road, Crinken Lane and Dublin Road.
- Highlights the benefit of this spine road at the outset and how it emphasises public transport and active travel as a priority within the Draft LAP lands. Notes that an additional north-south route parallel to the R761 (Dublin-Bray Road) will alleviate pressure on the R761 and M11 while avoiding the creation of a large motorway junction gyratory system at Woodbrook College given that most travel demand will be to and from Dublin City to the north. Additionally, the spine road would facilitate active travel permeability between new and existing development and ultimately into the Rathmichael LAP lands. Includes a figure outlining the proposals for the north-south bus priority route connecting Old Connaught Avenue to Crinken Lane.
- Notes the proposed bus route traversing through the landowners' holdings that veers west to join Ferndale Road between two existing houses with protected mature trees according to the County Development Plan. Suggests the proposed bus route is impractical given the 1:10 topographical gradient the route is located on and recommends a route relocation that meets Ferndale Road further south that can be facilitated with landowners' holdings.
- Submission is of the opinion that the phasing of infrastructure delivery be revised to align with the phasing of development and proposes the link road from Old Connaught Avenue to Crinken Lane be included in Phase 1. Includes four figures suggesting changes to phasing, timeframes, housing delivery, number of units and respective landowners involved.
- Emphasises that despite the 'Strategic Reserve' zoning on the landowners' holdings, the development of the lands should be included in an earlier phase than the proposed phasing programme in the Draft LAP (Section 11.3) given that it would be consistent with proper planning and sustainable development practices and in the event that the lands are re-zoned in the next CDP review. Submission is of the opinion that these lands will be some of the best served by public transport following the construction of the Old Connaught Avenue – Crinken Lane link road. Highlights that early development of these lands also facilitates pumping station construction needed to serve the Rathmichael LAP lands and that the necessary sewerage connection to the pumping station can be facilitated along the spine road connection to Crinken Lane.
- Concludes by welcoming the publication of the Draft LAP and reiterates the recognition of the changing policy and legislative environment. Offers the opportunity to collaborate with the Planning Authority and other stakeholders to ensure the expedition of development including housing and associated infrastructure works. Suggests that the best practice for achieving this objective is to concentrate on the build out of infrastructure within the control of major landowners in the plan area which is essential to the Old Connaught Avenue – Crinken Lane link and the delivery of high-quality public transport.
- Recommends that the phasing programme deliver housing at scale by involving the three major private home builders (and dlr) at the outset as competition will put downward pressure on housing prices and compress the overall time needed to build out the plan area.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapters 1, 6, 10, 11 and Other Issues

**DLR Submission  
No: B0051**

**Person: D Healy**

**Organisation:**

**Summary of Submission / Observation:**

- Cites concerns related to the Movement and Transport plans for Old Connaught Avenue/Ferndale Road specifically that Old Connaught Avenue will be closed to through traffic and that part of Ferndale Road will become one-way.
- Raises issue that the plans will have a negative impact on residents in Old Connaught House and beyond by cutting off direct access to Bray, Enniskerry and the M50. Submission is of the opinion that depending on the direction of travel, residents may not have direct access to the homes (e.g. Old Connaught House does not appear to be considered 'local' with regard to the bus gate restrictions).
- Submission is of the opinion that locals and visitors to the area will not have direct or easy access to amenities along Old Connaught Avenue/Ferndale Road including schools, a golf club, GAA grounds, church, funeral home, etc.
- Objects to the proposed alternative route as it will substantially add to journey lengths and travel times. References the temporary closure of Ferndale Road to facilitate works on the water reservoir and the traffic chaos on surrounding roads which was exacerbated at peak hours. Submission is of the opinion that this plan will not reduce traffic, but rather move it to other, already heavily congested roads (e.g. Old Connaught House residents will have to use Dublin Road to access the M50 which is already extremely busy, especially at peak times).
- Requests that the plans be revisited and suggests an alternative route that continues to allow two-way traffic on Ferndale Road/Old Connaught Avenue and proposes the removal/relocation of any bus gates/bus lanes to new roads if necessary.
- Highlights disappointment with lack of attempts to include preservation of the area's historic character and natural beauty within the plan. The submission acknowledges the decision to zone the area for high density housing but emphasises the need for any development to enhance rather than detract from the area's character and quality of life for residents. Notes serious concerns about how Old Connaught and surrounding areas will cope with housing development on this scale, given area's existing significant traffic congestion.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapters 4 and 6

<b>DLR Submission No: B0052</b>	<b>Person: Mr. and Mrs. Terry &amp; Fiona O' Neill</b>	<b>Organisation:</b>
<b>Summary of Submission / Observation:</b> <ul style="list-style-type: none"> <li>• Notes the submission is in accordance with Section 20 (3)(a) &amp; (b) of the Planning and Development Act 2000, as amended, (hereafter referred to as The Act), the Local Authority have published the Old Connaught Draft Local Area Plan 2025 and recognises submissions can be made over the course of a 6 – week public consultation period.</li> <li>• Highlights the closing date of this public consultation and that this submission was made within the appropriate timeline for a submission (i.e. April 17th, 2025). States that under Section 3(b)(iii) of The Act that submissions or observations in respect of the LAP during this specified period will be taken into consideration in deciding upon the proposal and comments on the inclusion of the submission on the facilitation of the Councils progression of the Draft LAP.</li> <li>• Cites a number of concerns relating specifically to the property in their ownership within the Draft LAP lands located on Old Connaught Avenue. Describes the residential property as a single storey, detached residential dwelling located on 1 acre site designated as 'Existing Built Fabric' within the 'Southern Character Area' of the Draft LAP. Presents a map of the site location following the description.</li> <li>• Highlights the vision outlined for the Southern Character Area (To provide for a new residential neighbourhood, one which will develop its own unique character and sense of place, with quality public realm and building design, and which will successfully integrate with the existing residential community'.)</li> </ul>		



- Notes the land uses within the area as Residential/Strategic Public Open Space/ Strategic Infrastructure. Includes the terms of the future housing net residential density of 60-80 dwellings per hectare for the area as well as proposed heights ranging from 2-5 storeys including setbacks. Highlights Figure 4.17 of the Draft LAP and cites concerns about how future housing development (in the form of apartment blocks) near the Submitter's property would reasonably be expected to be at the higher end of this density range.
- The submission also notes that lands immediately north of the property, which form part of 'Central Character Area' are designated for higher densities again at between 80 – 100 dph.
- Acknowledges the Draft LAP's objective to preserve a number of existing properties along Old Connaught Avenue as 'Existing Built Fabric' including the property but submit that the character of the road will be fundamentally altered by the Draft LAP and requests a planning response that expands the residential zoning to include the property and perhaps the last two remaining properties on this section of Old Connaught Avenue within this Character Area.
- Emphasises that the character of Old Connaught Avenue has been altered by the collectively purchased exiting properties immediately west of the site which have been boarded up until future development commences. This lack of activity has harmfully impacted the road's character on a temporary basis and in accordance with the Draft LAP, redevelopment of these properties will occur to provide for future public open space lands. This redevelopment will continue the significant alteration of Old Connaught Avenue and will result in a permanent change to the area's character.
- Submission states that properties to the immediate east will also be demolished to facilitate substantial future development works comprising the construction of a new road and LUAS corridor which will be located c. 40 meters from the Client's property. The new 'Bus Gate' and LUAS stop will be located c. 140 m from the site to the east and Old Connaught Avenue is identified as an 'Active Travel/Bus Route' which will result in road improvement/widening works further altering the existing character.
- Notes that 6 no. existing residential properties along Old Connaught Avenue will be demolished to facilitate the aforementioned substantial development works envisaged in the LAP both to east and west of subject site. Raises issue with these works as it will fundamentally the character of the area as per the LAP Vision for this Character Area, which is to provide for a 'New Residential Neighbourhood' with 'its own unique character and sense of place.'
- Submission is of the opinion that an attempt to maintain existing built fabric at this location is an optimal planning/ design approach given the fundamental alteration of the area. Considers that this will cause physical isolation of a family home within a new high-rise environment and will render the property out of alignment with future character of the area emerging in accordance with the Draft LAP. Reiterates the isolation of the single-family dwelling in the midst of medium to high-rise apartment blocks, a new busy road, and a new Luas line and station.
- Strongly recommends a change in zoning of the property to align with same zoning provision in front and behind Submitter's property i.e. for the provision of apartment developments of up to four storeys with an additional set back level.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapter 4

DLR Submission No: <u>B0053</u>	Person: Office of the Planning Regulator (OPR)	Organisation: Office of the Planning Regulator (OPR)
<ul style="list-style-type: none"> <li>• This submission is summarized in full in Volume 1 in accordance with section 20 (3) (c) (ii)(II) of the Planning and Development Act, 2000 (as amended).</li> </ul>		

**Response and Recommendation to issues are located in Volume I, Part 2 under the following heading(s):**

Overview of the Submission, Main Issues Raised and Recommendations Made by the Office of the Planning Regulator

DLR Submission No: B0054	Person: Dr. Theo and Dr. Sasha Murphy	Organisation:
<ul style="list-style-type: none"> <li>Provides information about who is making the submission, who the submission being made on behalf of, the client's freehold ownership of their property at Springmount House and outlines the subject property on an extract from the Draft LAP map.</li> <li>Supports and understands the requirements for the Old Connaught LAP. Submission compliments the vision for the area and makes note of two elements of the vision they feel are important for the area: <ul style="list-style-type: none"> <li>Character and Heritage</li> <li>Climate and Ecosystems.</li> </ul> </li> <li>Requests that full consideration be given to the following matters prior to the finalisation of the LAP process: <ul style="list-style-type: none"> <li>The adverse impact of the proposed new road along the northern boundary of the subject property on the character, heritage, and ecosystem value of both the historical property and its surrounding landscape.</li> <li>Challenges presented by the proposed urban greenway that traverses the centre of the private property such as safety and accessibility. Highlights that the proposed urban greenway does not align with the Draft LAP's stated vision.</li> </ul> </li> <li>Notes the potential for further discussion regarding the route of the proposed new road north of the property in more detail to ensure that all concerns outlined above are addressed as well as their confidence in a resolution for these concerns.</li> <li>Submission cites the following concerns regarding the new proposed urban greenway: <ul style="list-style-type: none"> <li>The northern section of the trail has a gradient exceeding 6% and the southern end has a gradient over 5% (which is marked in red on an extract map from the LAP in the submission). Highlights how these gradients exceed the Irish Wheelchair Association's Access Guidelines for the Great Outdoors, which advise that inclusive access routes maintain manageable gradients to accommodate: <ul style="list-style-type: none"> <li>Wheelchair users</li> <li>People with prams or small children</li> <li>Older adults</li> <li>Casual cyclists</li> </ul> </li> <li>Concludes by emphasising that the proposed steepness of the greenway risks excluding members from the community from enjoying the public, inclusive, universally accessible amenity.</li> </ul> </li> <li>Submission cites concerns about the greenway's alignment in the northern portion of the Draft LAP which appears to traverse private, undeveloped and isolated land which highlights how the area lacks natural surveillance and could deter vulnerable groups like women, children and older individuals from utilizing the greenway especially during off-peak hours. Acknowledges that infrastructure should be both physically accessible as well as psychologically safe and inviting to all users.</li> <li>Raises issue with how the proposed greenway would bisect the property resulting in compromising its integrity and the diminishing of its overall value as a historic residence representing a property of significant cultural and intrinsic value.</li> </ul>		



- Submission supports a proposed alternative urban greenway route (which is marked in purple on an extract map from the Draft LAP in the submission) that would:
  - Follow a gentler gradient more aligned with national accessibility guidelines.
  - Traverse an open greenway within observational distance of a public road, providing greater natural surveillance and a stronger sense of safety.
  - Link a park as well as the planned educational facilities to the greenway to improve active travel specifically for the schools.
  - Situate the route through the centre of the Strategic Land Reserve (SLR) rather than the edge of the area which would improve access for future residents as the SLR is developed.
  - Encourage broader use via direct integration into future residential areas to promote walking, wheeling, and cycling as primary modes of transport for more people.
  - Preserve the integrity of the property and its surrounding ground's.
  - Reduce the loss of value to the property via compulsory purchase and retain public funds dedicated for the current proposed route.
- Emphasises how the alternative route encourages school children and parents to use the greenway as a safe, healthy, and environmentally friendly commuting option.
- Notes that the suggested alternative greenway route aligns directly with Policy OCLAP 30, which promotes the "10- minute neighbourhood" concept — ensuring that key services, including schools and community amenities, are within walking or cycling distance. Reiterates how the revised greenway location will deliver on this policy objective via a direct, accessible and welcoming route connecting future residents to local services.
- Recommends rerouting the greenway to follow the proposed purple alignment provided on the map in the submission to avoid steep, inaccessible gradients, avoid unsafe unmonitored parklands, link two schools together with a park and ensure more equitable access in the SLR. Also recommends involving accessibility experts and local residents during detailed design phases of the planning stage to ensure the greenway reflects the inclusive spirit and sustainable goals of the Draft LAP.
- Concludes with a request to include points raised in the submission into consideration when finalising the LAP and notes the availability for discussion between clients and Planning Authority if necessary.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapters 4 and 6

<b>DLR Submission No: B0055</b>	<b>Person: Old Conna Golf Club</b>	<b>Organisation: Old Conna Golf Club</b>
<b>Summary of Submission / Observation:</b> <ul style="list-style-type: none"> <li>• Welcomes the Draft Old Connaught Local Area Plan 2025 and endorse the vision for Old Connaught as a sustainable urban village. Submission is of the opinion that the organisation can make an active contribution to the community specifically key areas of Character and Heritage, Sustainable Neighbourhoods, Healthy Placemaking, and Climate and Ecosystems. Notes the organisation's commitment to the promotion of biodiversity and environmental sustainability within its site while ensuring compliance with all relevant EU laws and guidelines. Highlights the purpose of the site to serve as both a venue for sport and recreation as well as a sanctuary for a variety of plant and animal species.</li> <li>• Addresses two issues in the plan: the Western Character Area (4.4.7) and Ferndale Road (6.6.4).</li> </ul>		

- Regarding the Western Character Area, the submission highlights the boundary between the Old Conna Golf Club and the character area which contains a deep ditch with steep banks and a stream. Notes a significant number of trees and woodland plants near the ditch and stream forming a barrier (between 20 - 50 m in depth) to the playing area of the course. Reiterates one of the Draft Plan's objectives for the Western Character area (to protect and preserve the existing trees and woodland) and requests that the stream barrier be maintained in its current form and that a barrier of 50m be provided on the Western Character area side to mirror the barrier on the Old Conna Golf Club side in order to protect the stream which has "riparian and diversity value" as well as maximise security and safety. Also notes that the inclusion of this statement in the plan will act as a guideline for developers as detailed development plans for this area are prepared.
- Concludes by addressing the boundary wall of the Old Conna Golf Club which runs along Ferndale Road and notes the proposal to introduce a one-way northbound system on a portion of the road. Suggests the potential for discussions with the Council regarding any changes required as a part of the traffic management requirements in the plan.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapters 4, 6 and 7

**DLR Submission  
No: B0056**

**Person: Philip O'Donnell**

**Organisation:**

**Summary of Submission / Observation:**

- The submission raises concerns regarding traffic and road infrastructure proposals in the Draft LAP.
- Notes the proposed level of development will increase traffic in the congested local network without the proposed strategic infrastructure upgrades around key access points to the N11 which will burden residents, commuters and schools.
- The submission states that any development must be progressed in parallel with Junction 5 upgrade featured in the N11/M11 Junction 4 to Junction 14 Improvement Scheme. This will allow connectivity between Old Connaught, the N11, and the Dublin Road.
- The submission requests that Thornhill Road be upgraded where it is narrow to ensure increased capacity and improved connectivity to the N11 via Junction 6.
- The submission requests that the Draft LAP's traffic management plan should aim to reduce signalised junctions and improve public transport options while maintaining a car friendly road network.
- The submission notes that there is a large catchment area for St. Gerard's School which includes County Wicklow and South Dublin. Car transport is currently essential for those in this wider catchment area and any increase in congestion is a safety concern.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapter 6

**DLR Submission  
No: B0057**

**Person: Old Connaught  
and District Community  
Association**

**Organisation: Old Connaught  
and District Community  
Association**

**Summary of Submission / Observation:**

- The submission notes its organisation and the people it represents with its letter.
- The submission explains the level of engagement with the Draft Plan the local community have completed with the help of the association, including an EGM.
- The submission notes their first concern relates to the proposed road network of the Draft Plan.

- The submission highlights that due to traffic being forced further north, via the proposed north-south link road, many cars will likely now decide to drive south along Thornhill Road across the county brook into Fassaroe. It notes this road is already inadequate to deal with current levels of traffic.
- The submission notes the indicative LUAS route to Fassaroe as seen in the dlr CDP 2022-2028 and the Bray Municipal District (BMD) LAP. It encourages the Local Authority to include a road provision to cross Ballyman Valley alongside this LUAS route.
- The submission highlights the objectives for such a road in the BMD LAP and states the lack of similar objectives in the Draft Plan is a conflict.
- The submission suggests a slightly altered route of such a road to the indicative one shown in the BMD LAP.
- The submission requests that the one-way northbound proposal for a portion of Ferndale Road be dropped. This is because the detour imposed on residents of Old Connaught House would be torturous and the proposed bus gates would lead to sufficient traffic calming along Old Connaught Avenue.
- The submission notes the dropping of the one-way proposal would also allow future residents of lands to the south of Old Connaught House better access to the proposed east-west link road.
- The submission concedes that if a one-way proposal be deemed necessary by the local authority, the extent of it be reduced to allow for two-way traffic in and out of Old Connaught House.
- The submission acknowledges that alternative access routes for Old Connaught House to the north may be possible, yet difficult due to land ownership.
- The submission raises concern over elements of the ABTA carried out for the Draft Plan.
- The submission specifies an issue with the appraisal of current traffic flow in the area, noting that traffic generated by cars entering the Draft Plan area, heading towards Bray Emmets GAA club and St. Gerard's School, are not taken into consideration by the ABTA. The submission notes alarm that therefore these locations and associated traffic are not mentioned in the Draft Plan's Chapter 6.
- The submissions provide photographic evidence of traffic generated by Bray Emmets GAA club and St. Gerard's School.
- The submission notes they found no mention of Traffic Counts, mentioned in the ABTA, in the Draft Plan. It also queries what time of the year and day these counts were taken as school term rush hours are busier than when out of term.
- Regarding Greenways, the submission expresses support of the Draft Plan's goals to improve accessibility through the use of active travel and greenways.
- However, the submission requests that the indicative greenway running north-south, east of Ferndale Road, be moved so it no longer intersects the plot boundary of Springmount House. The submission notes the historic nature of the property and the negative impacts such a greenway would have.
- The submission requests the upgrading of Maddocks Lane, an existing right of way, to provide active travel connections to Shankill. It notes this would allow for safer travel from and within the Draft LAP area.
- The submission notes a flaw in the SFRA (Appendix 1), which states "the FRA has not identified any historic pluvial flood risk areas within the catchment". It notes that pluvial flooding has been a significant issue in the area and references the flooding of the M11 motorway in 2013 as an example.
- The submission collates a non-exhaustive list of recollections of pluvial flooding in the area and provides relevant dates.
- The submission provides further context and detail of these pluvial flooding events.
- The submission notes the SFRA specifies that flooding is not expected to occur in a 1% AEP but would occur in a 0.1% AEP. The submission raises concerns that this prediction has not taken into consideration surface water run-off caused by rainfall.
- The submission raises concerns that this lack on consideration in the SFRA may lead to the under prediction of flooding in the area.

- The submission also notes that during ground saturation of fields around Ballyman Road and Thornhill Road, further rainfall causes run off and flooding on Thornhill Road. This is documented with photographic evidence from a 1995 event, which includes further run-off from Ballyman Road itself. The submission also provides similar photographic evidence of events from 1994, 2007, 2009 and 2013.
- The submission provides further photographic evidence of a similar flood event that also expanded through the existing village green.
- The submission reiterates these events are non-exhaustive and demonstrate the considerable pluvial pressure that could be put on the storm drains installed in 2014.
- The submission highlights a watercourse which runs between the fields to the east of Old Connaught House alongside the old carriageway at the boundary between the areas zoned A1 and GB. This watercourse feeds into the Old Connaught Stream at the point where Figures 6-7 and 6-8 in Appendix 1 show that flooding would occur in 1% and 0.1% AEP events. It queries whether this was taken into consideration during the SFRA.
- The submission notes significant pluvial flooding events along Allies River Road and into Cuilín. These events are caused when saturation is reached in the surrounding fields, causing run off. The submission notes evidence of this via significant buildup of soil on the road surface at the end of Allies River Road.
- The submission also outlines a coordinated proposal for protecting, enhancing, and activating the Old Connaught core as a heritage-led, service-rich, and community-oriented village centre.
- The submission provides the historical context and makeup of the area, including key views of protected structures and issues that have arisen over time.
- The submission notes the spatial and architectural ensemble constitutes a high-value heritage landscape, deserving of preservation and active integration into the Draft LAP as a functioning and attractive neighbourhood centre.
- The submission requests that the village core should be designated as an ACA in the Draft LAP. It gives further detail and context for this request.
- The submission requests that the historic village core, as outlined in figure 9.3 of the Draft Plan, should be expanded to include the high stone wall on the northern side of the road, which incorporates the recessed area, platform and stone steps where the village pump was located. A further request is made to expand the area to include the stable yard associated with Old Connaught House.
- The submission states that the village core in Old Connaught should contain a sufficient mix of uses to support the new and existing community in Old Connaught. It includes examples of such services that would make up a sufficiently varied village core.
- The submission requests that the Draft LAP should identify the village core as the anchor of the new neighbourhood, with planning policies that protect its form and intentionally elevate its role as a civic centre to the new residents in the outer zones.
- The submission highlights the historic stable block opposite Festina Lente as being ideal for adaptive reuse, and requests its protection and reactivation be prioritised.
- The submission requests that the village core be designated as a pedestrian priority environment with co-ordinated design elements.
- The submission highlights a permeability opportunity at the junction of Old Connaught Avenue and the laneway to Festina Lente, and requests that a provision for a CPO be included in the LAP. The CPO would be activated to achieve the following goals: Open up this laneway as a pedestrian route; Create a gateway plaza that links the avenue with the village core; Reinforce the visual axis and establish a clear sense of arrival and presence in a village.
- The submission requests that all future planning applications in the village core should be subject to compliance with a specific architectural code. The submission provides detail on what should be included in such a code.

- The submission further requests a list of standards and requirements to be implemented into the planning application appraisal process.
- The submission notes concern that Phase A: sub-phase 1 allows for the construction of 450 units without any additional road infrastructure or traffic measures. It notes the additional car trips generated by such development would cause extreme pressure on an already inadequate road network.
- The submission requests that the delivery of the neighbourhood centre be moved from Phase B to Phase A to provide the necessary services to the new residents of Phase A and achieve a 10-minute neighbourhood as soon as possible.
- The submission requests that the proposed bus gate be brought forward in phasing to coincide with the opening of the proposed new bridge over the M11.
- The submission notes the language around wastewater as found in section 10.3.2 of the Draft Plan. It notes concerns with the inclusion of the words "where possible" in the context of transferring wastewater solutions to a main network and away from septic tanks. The concerns centres around the possibility of a new connection for an existing household to be subject to a payment to an adjacent landowner, which may lead to excessive costs for residents. The submission therefore requests that a provision be implemented into the LAP which stipulates developers must facilitate the connections of existing households at no extra cost to existing households.
- The submission criticises the lack of development contribution detail in the Draft LAP. It further requests that the LUAS connection to Fassaroe be included in any development contribution scheme set up for the area.
- The submission concludes that the naming of a new proposed park as "village green" is confusing as a village green already exists.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapters 1, 5, 6, 8, 9, 10, 11, Appendix 1

<b>DLR Submission No: B0058</b>	<b>Person: Rob Goodbody</b>	<b>Organisation:</b>
<b>Summary of Submission / Observation:</b> <ul style="list-style-type: none"> <li>• The submission provides what are considered to be errors in the Draft LAP that are highlighted to ensure the final LAP is of the highest quality possible.</li> </ul>		
<b>Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):</b>		
Chapters 1, 4, 5, 7, 8, 9, 11, Appendices 4-5 and Other Issues		

<b>DLR Submission No: B0059</b>	<b>Person: National Transport Authority (NTA)</b>	<b>Organisation: National Transport Authority (NTA)</b>
<b>Summary of Submission / Observation:</b> <ul style="list-style-type: none"> <li>• The submission notes the NTA was represented on the Stakeholder Board for the ICAS and provided input on transport-related matters throughout the preparation of the Study. Refers to the use of the NTA/TII Area Based Transport Assessment (ABTA) Model in the ICAS which formed the basis of the transport proposals contained in the Draft LAP.</li> <li>• Submission notes that the NTA is supportive in general of the policies and objectives set out in the Draft LAP, and of the Council's commitment to plan-led development.</li> </ul> <p>Chapter 6 Transport and Movement</p> <ul style="list-style-type: none"> <li>• Submission indicates that the NTA has no objection in principle to the road proposals contained in the Draft LAP. The submission notes the limited number of new roads and their intended purpose to provide for orbital circulation of traffic</li> </ul>		

away from the village core in the south and west of the Draft LAP area, to provide access to development lands, and to serve as replacement strategic road links in lieu of the widening of existing sub-optimal roads. They highlight the proposed bridge over the M11 linking Old Connaught to the Dublin Road as a key element of the new road network, which will facilitate the implementation of a range of active travel and public transport measures in the LAP area.

- Submission refers to the phasing strategy of the Draft LAP in relation to the provision of the proposed bridge. Submission indicates that while they support this approach, they note that for Phase C lands, the only requirement is that works on the bridge must have commenced, whereas they submit that this bridge should be complete and operational prior to the release of the Phase C lands for residential development, subject to the relevant zoning being in place.

#### Recommendations:

- Submission recommends that Objective TM19 – Roads and Streets should be re-worded to reflect the current funding arrangements for local roads. The submission highlights that the NTA is not a funding agency for local roads, which are the responsibility of the Department of Transport, and recommends Objective TM19 be re-worded to reflect this.
- Submission recommends that Objective TM20 should be amended, such that off-line facilities should be considered in the development of roads schemes, but not in lieu of in-line facilities where they are required, and that any off-line facilities must be fit for purpose throughout the day and year-round. The NTA would support an amended Objective TM20 that provides for both off and on-line facilities, rather than off-line only as an alternative to on-line.
- Submission recommends that the M11 overbridge should be complete and operational prior to the development of the Phase C lands.
- In relation to cycle parking, the submission is supportive of Policy OCLAP34 and Objective TM8 but recommend that further detail be provided regarding the design and layout of such facilities.

#### Recommendation:

- The submission recommends that Policy OCLAP 34 and Objective TM8 should be revised to take account of the full spectrum of cycle types and users, providing for both long-term storage and short-term parking, in both the public realm and in new developments. The NTA also recommends that Policy OCLAP 34 and Objective TM8 should refer explicitly to current design guidance set out in the council's Standards for Cycle Parking and associated Cycling Facilities for New Developments and in the NTA's Cycle Design Manual.

#### Chapter 11 Phasing and Implementation

- The submission is supportive of the preparation of a phasing plan for the development of the LAP area are broadly supportive of the proposed phasing sequence, which prioritises lands closest to existing public transport services east of the M11 in the short term. The submission notes subsequent phases, to the west and south of the LAP area, would be dependent on the delivery of a range of infrastructure including transport measures such as new roads, bus services and active travel facilities.
- The submission suggests that the phasing tables could be explicit in aligning the delivery of other roads such as the southern orbital route links with the delivery of the new north-south link road and the M11 overbridge. Alternatively, the submission notes that additional criteria could be included in the phasing tables that would allow residential developments to be permitted and constructed, but not occupied until the required roads infrastructure is in place.

#### Recommendations:

- Submission recommends that the release of Phase C lands should be contingent on the completion of the M11 overbridge and that the phasing of development would merit further consideration with regard to the other roads in the Draft LAP, to ensure that new residential areas are not characterised by high levels of car use from the outset.

**Response and Recommendation to issues are located in Volume I, Part 2, Section 2.2:**

Overview of the Main Issues Raised and Recommendations Made by the National Transport Authority (NTA)

**DLR Submission  
No: B0060**

**Person: Castlethorn**

**Organisation: Castlethorn**

**Summary of Submission / Observation:**

- Introduces the planning agent making the formal submission on behalf of their client Castlethorn. Confirms the careful consideration of the contents of the Draft Local Area Plan (LAP) and background papers.
- Notes the submission was made in respect of the draft public consultation stage for the Old Connaught LAP prior to submission deadline.
- Recognises the client's support of the preparation of the LAP by Dun Laoghaire-Rathdown County Council (dlr) and welcomes the opportunity to make observations on the Draft LAP.
- Highlights their hope to assist dlr with arriving at a fully informed approach to realise the sustainable development potential within the Old Connaught lands prior to the final adoption of the Draft LAP.
- Notes the client's interest in Old Conna LAP lands which amounts to a total area of 25.77 Ha and references Figure 3.1 on page 6 of the submission for further information.
- Acknowledges the booklet prepared by O'Mahony Pike, Architects (OMP) supporting the submission and its inclusion in the overall submission made by the planning agent.
- Requests that dlr consider the contents of the submission.

**Executive Summary:**

- Provides an executive summary outlining key points raised in the submission regarding the sustainable development potential of the client's lands predominately within the 'Central Character Area' (CCA). The submission indicates that focus is on the negative and unsubstantiated requirements of the Draft LAP related to:
  - Extremely low developable extent of client's lands comprising both residential zoned land and designated Strategic Reserve land amounting to 38%, representing an unsustainable use of the scarce urban resource of serviceable land of designated residential development potential.
  - Unprecedented high level of proposed public open space amounting to 28.7Ha across the LAP lands as outlined in the Draft LAP, representing c. 42% of the overall lands activated under the Draft LAP. Notes the requirement that an additional 10% of residential development areas must be set aside for public open space, increasing the proportion of overall public open space to c. 48%. Within the Central Character Area, the proportion is closer to 55%. Submission is of the opinion that these proportions for public open space provision are unsubstantiated and unwarranted by reference to the Draft LAP, the ICAS and County Development Plan (CDP) in terms of quantum. Emphasises the provision displaces much-needing housing within Old Connaught and would require significant capital funding to deliver.
  - Draft LAP density requirements that are unsubstantiated by reference to national planning policy guidance including Section 28 Compact Settlement Guidelines (2024) and equates to an average residential density of c. 65



dwellingings per hectare at this suburban/urban extension location of a Key Town, outside of the defined Dublin City and Suburbs consolidation area but within the Dublin Metropolitan Area.

- o High density implying a housing mix with a high predominance of apartments that estimations a composition of circa one-third houses and two-thirds apartments/duplexes. Cites concerns that delivery of apartments in Old Connaught will be reliant on State subvention and support which is increasingly uncertain in the fast-changing geo-political climate. Highlights that residential development by, or on behalf of, public bodies are exempt from Development Contributions payments which is the normal means for funding infrastructure necessary for new residential development and the potential for this to undermine the viability and feasibility of physical and social infrastructure delivery planned for Old Connaught, and thus the realisation of residential development as planned for Old Connaught.
  - o An unnecessarily detailed, potentially prescriptive Draft LAP masterplan that is not suggestive of a DMURS compliant layout needed to deliver good quality place-making and a traffic calmed and pedestrian friendly environment.
  - o Unduly prescriptive phasing requirements within Draft LAP that inhibit necessary critical mass of development to proceed in tandem with the funding of required physical and social infrastructure outlined in the Draft LAP and lack clarity regarding funding and infrastructure delivery intentions.
- Requests that the final adoption of the Old Connaught LAP include:
  - o Consistency with strategic planning policy for sustainable residential densities in urban areas
  - o A balance between the delivery of sustainable residential development and an appropriate, viable housing mix combined with a commensurate quantum of public open space and infrastructure across the entire LAP in a manner that does not unduly or disproportionately impact one landowner.
  - o Consider suggested alternative proposals with respect to Central Character Area allowing a greater proportion of zoned and designated Strategic Reserve lands to come forward for residential development in the interests of a more consistent, equitable approach across the Character Areas.
  - o Allow greater flexibility and acknowledge council's role and responsibility regarding infrastructure delivery as set out within phasing requirements of the Draft LAP.

#### Land Ownership:

- Provides description of the Draft LAP boundaries including their uses and location of client-owned lands which are to the north of Old Connaught Avenue. Emphasises the client's interest within the central lands represented by greenfield land that amounts to c.25.77Ha which is identified in Figure 3.1 of the submission. Notes client interest in smaller parcel of land outside and to the east of the Draft LAP boundary equating a total area of 7.44Ha.

#### Planning Policy:

- Highlights the need for consistency with the following strategic level planning policy and guidelines, applicable nationwide at national and regional levels:
  - o National Planning Framework (NPF)
  - o Regional Spatial Economic Strategy for the Midlands and East (RSES) and Dublin Metropolitan Area Strategic Plan (DMASP), 2019-2031
  - o Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities, 2024
  - o Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities, July 2023

- Urban Development and Building Height Guidelines, 2018
  - Design Manual for Urban Roads and Streets, 2019
- Outlines the role of Dublin as a key driver nationally in the growth strategy identified in the RSES and the desire to support the future growth of the city via improved management to ensure growth can be accommodated within and close to the city. Notes the location of Old Conna within the context of Dun Laoghaire-Rathdown County, the RSES and its proximity to the key town of Bray in Wicklow County.
- Offers a review of the 'Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities, 2024' and notes the promotion of sustainable residential development as the purpose for the guidelines. Notes the need to set out density requirements about location, settlement significance and accessibility to public transportation. Highlights the promotion of greater flexibility in residential design standards to support the delivery of compact 'own door' housing and a greater range of affordable housing options. Emphasises Paragraph 5.2. of the guidelines which states:  
 "With significant population growth forecast, and changing demographics that will see a more diverse range of households, it is Government policy to support medium density 'own door' housing models in Ireland, alongside traditional housing and apartment developments. This policy is aligned to NPF priorities for compact growth and with Housing for All priorities to provide a greater range of housing options"
- Reiterates the importance of own door housing for areas outside of densely built-up areas like Old Conna as it allows for more compact housing and uplift in density that ensures site specific suitable development appropriate within the wider local context and suitable standard of accommodation.
- Notes an overall recommendation for the Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities, July 2023 guidelines that includes the appropriate location of apartment in urban areas as stated in Paragraph 2.1 of the guidelines. Outlines additional recommendations included in the guidelines such as:
  - The scale and extent of apartment development should increase in relation to proximity to core urban centres, high frequency public transport nodes, centres of employment and range of urban amenities;
  - For 'intermediate urban locations', within walking distance (10-15 mins or 1,000-1,500m) of existing or planned high capacity urban public transport stops (such as DART or commuter rail), or within reasonable walking distance (5-10 mins or 1,000m) of existing or planned high frequency urban bus services, or within easy walking distance (5 min or 500m) of reasonably frequent urban bus services, higher density development comprising wholly apartments or medium-high density mixed residential development, at broadly >45 dwellings per hectare (net) is promoted.
  - For 'Peripheral and/or Less Accessible Urban Locations' are generally suitable for limited, very small scale (will vary subject to location), higher density development that may wholly comprise apartments, or residential development of any scale that will include a minority of apartments at low-medium densities (will also vary, but broadly <45 dph).
- Emphasises that the compact settlement guidelines should be considered given their publication in 2024. Notes that a further analysis of the with respect to the compact settlement guidelines are included in section 5.3 alongside an analysis of existing and planned public transport provision. Emphasises the importance of public transport provision as it informs an appropriate quantum for a housing mix.
- Outlines recommendations included in the Urban Development and Building Height Guidelines, 2018 such as:

- o Promotion of increased prevailing building height and overall density of development to achieve the key objectives of the NPF for compact development.
  - o Achievement of SPPR4 which considers minimum densities set out in compact settlement guidelines for planning of future residential developments of greenfield or edge of city/town locations relative to proximity to high frequency public transport nodes.
  - o Provisions of a range of household sizes from 1 to 4-bedrooms or more for newer housing developments at suburban edges of towns and cities as well as more traditional development that can enhance viability compared to apartment only projects and deliver attractive street-based residential environments.
  - o Appropriate residential development in excess of 45 units per hectare at central and / or accessible intermediate locations such as wholly apartment development.
- Summarises the purpose of the Design Manual for Urban Roads and Streets, 2013 guidelines and recognises effectiveness of well-considered street design regarding cost and efficiencies which results in the reduction of burdens on national and local authorities and ensures roads and streets built to the highest of standards. Notes that the guidelines recommend that:
  - o Well-designed streets can create connected physical, social and transport networks that promote real alternatives to car journeys, by facilitating walking, cycling and use of public transport.
- Provides a list of land use zoning, specific objectives and their respective detailed descriptions included in the Dun Laoghaire-Rathdown County Development Plan 2022-2028 for the area including:
  - o 'A1' (residential) *"To provide for new residential communities and Sustainable Neighbourhood Infrastructure in accordance with approved local area plans."*
  - o 'GB' (open space) *"To protect and enhance the open nature of lands between urban areas."*
  - o 'F' (high amenity) *"To preserve and provide for open space with ancillary active recreational amenities."*
  - o Other key objectives include:
    - 'ED' Proposed education site, 'INST' To protect and/or provide for Institutional Use in open lands, 'TA' To provide accommodation for the Travelling Community
    - Proposed Luas Line Extension
    - To protect and preserve Trees and Woodlands
- Includes an extract of Map 14 within the overall CDP.
- Details the 50.13 hectares that Old Connaught occupies, notes the potential residential yield of 2,005 units as referenced in table 2.9 of the Dun Laoghaire County Development Plan 2022-2028 and provides a description for the Tier 2 zoned Old Connaught lands which states that they are not *"not currently sufficiently serviced to support new development but have the potential to become fully serviced within the lifetime of the plan."* Emphasises that in practise Tier 2 zoned lands require infrastructure improvements in order to deliver much of the development within the area.
- Notes identification of Strategic Land Reserve (SLR) amounting to 38 hectares as well as the potential yield of 1,050 units and potential phasing commencement as post Q1 2028.
- Highlights existing population as c. 454 under the assumption that 2.7 people live in 170 residential addresses and notes the 2 vacant homes within the LAP area. Outlines the proposed future population for Old Connaught as between 6,000 – 6,500 people without including the Strategic Reserve lands. Assuming the re-

zoning of the Strategic Land Reserve, the population could increase to 8,500-9,000 people.

Draft LAP Submission:

- Acknowledges key themes within the Draft Old Connaught LAP for sustainable development and highlights areas of particular relevance to the submission as follows:
  - Extent of landholding and Net Developable Area
  - Residential Density
  - Density, Viability and Resultant Housing Mix
  - Indicative Masterplan incorporated in Draft LAP
  - Public Open Space provision
  - Consideration of Alternative Scenarios
  - Infrastructure and Phasing
- Notes that the booklet prepared by OMP supporting this submission explores the net developable area of lands against the masterplan of the LAP and highlights that 62% of the lands within the client's interest consists of non-residential / non-developable uses like the N/M11 realignment, key avenues, LUAS reservation, public open space, a school site, strategic infrastructure including a regional attenuation pond and an 'active park' described as being a proposed indoor and outdoor recreational and cultural campus. Includes Figure 5.1 from the OMP booklet demonstrating the proposed land allocations.
- Provides detailed descriptions for each of the proposed non-residential uses within the client's interest with the proposed active park and school forming the most significant burden representing 27.7% of the client's lands, followed by 12.9% along the eastern boundary for a potential N/M11 upgrade. The proposed key avenues within the main central area and strategic infrastructure (regional attenuation pond) represent 7.4% and 7.1% of land respectively. Finally, 3.1% of the client interest lands are allocated towards a LUAS reservation despite no assurances that this proposed route will be followed.
- Objects to the onerous burden placed on the client's lands of interest at a scale not imposed upon other landowners within the LAP boundary. Notes that a further c.23% of lands within the client's interest adjacent to the LAP boundary is reserved on the eastern side of the M11 to deliver the bridge crossing and link road to the Old Dublin Road along with a realignment of a planned senior GAA pitch on the Woodbrook College site in order to accommodate this road infrastructure.
- Highlights Castlethorn and its partners' ownership over the land necessary to provide this additional enabling infrastructure which represents an additional c. 1.75 hectares land take.
- References the significant extent of de-zoning the client's land and sterilisation of the full extent of Strategic Reserve lands, from residential to open space and educational use within the Draft LAP.
- Objects to the lack of burden placed on other landowners regarding the reservation and dedication of a considerable and predominant extent of land for non-development which is depicted in Figure 5.2 of the OMP booklet. Notes an understanding of the expectation that a proportion of land is needed for associated physical and social infrastructure but emphasises the burden be shared equitably between key landowners within the Draft LAP. Details a comparison of differentiating land take with the western character area having c. 77.8% of land that is developable and the southern character area having a developable land bank of c. 74.1% - this is in stark contrast to a 42.5% net developable area for the central character area (or 37.9% for the client's land of interest as set out in figure 5.1) and is significantly below the overall Draft LAP average of 58.2%.
- In relation to residential density, the submission notes relevancy of Old Conna's classification within the RSES for the Midlands and Eastern Region as well as Table

3.3 of the compact settlement guidelines which focuses on density consideration and acknowledged within the Draft LAP under section 5.3.4. Highlights the consideration of Old Conna under the 'Centre and Urban Neighbourhoods' label with respect to the Metropolitan Town of Bray given its population is greater than 1,500 people. Provides an argument for the classification of Old Conna on the basis that the Draft LAP area is a "*strategic and sustainable development location*" and represents "*lands around existing or planned high-capacity public transport nodes or interchanges*" which are included as qualifying considerations.

- References Table 3.8 of the compact settlement guidelines which states that: *'Planned public transport' in these Guidelines refers to transport infrastructure and services identified in a Metropolitan Area Transport Strategy for the five cities and where a public authority (e.g. National Transport Authority, Transport Infrastructure Ireland or Irish Rail) has published the preferred route option and stop locations for the planned public transport.*
- Acknowledges the relevancy of the GDA Transport Strategy 2022-2042 and states that it is a long-term objective (post-2042) to extend the Luas Green Line from Brides Glen to Bray Environs. Highlights that the lack of preferred route options and stop locations disqualifies Old Connaught from the classification of Metropolitan Town (>1,500 population) – Centre and Urban Neighbourhood' as set out in the compact settlement guidelines. States the discussion of the potential Luas extension to Bray is under Section 6.3.4 in the Draft Old Connaught LAP and reads as follows:  
"The Strategy states that the alignment and the locations to be served between Brides Glen and Bray have yet to be determined and will be subject to detailed design and planning work. In accordance with the overarching transport objective, the extension of the Luas Green Line has been integrated, as far as reasonably practicable, into the Transport Strategy for the area. While this Draft Plan incorporates a reservation corridor to safeguard lands for the potential routing of the Luas through Old Connaught, it does not seek to pre-determine the independent route selection process which has not yet been undertaken."
- Submission is of the opinion that Old Connaught fits the description of an urban extension to Bray, rather than the centre or an urban neighbourhood based on the next classification within the compact settlement guidelines relevant to Metropolitan Towns (>1,500 population): '*Suburban / Urban Extension*'.
- References clarifications in the Guidelines that state, "*..urban extension refers to greenfield lands at the edge of the existing built-up footprint that are zoned for residential or mixed-use (including residential) development.*" Includes Figure 5.3 which offers a detailed description of area and density ranges classifications within the Sustainable and Compact Settlement Guidelines, 2024.
- Notes the significant difference in terms of density requirements between the first two criteria in the range of 50 dph to 150 dph (net) for densities which needs to be generally applied in the centres and in urban neighbourhoods of Metropolitan Towns whereas densities in the range of 35 dph to 50 dph (net) are to be applied at suburban and edge locations of Metropolitan Towns with densities of up to 100 dph (net) open for consideration at 'accessible' locations within suburban / urban extensions -- as defined in Table 3.8 of the compact settlement guidelines and Figure 5.4 of the OMP booklet.
- Refers to a definition of an accessible location as being:  
"*Lands within 500 metres (i.e. up to 5–6-minute walk) of existing or planned high frequency (i.e. 10-minute peak hour frequency) urban bus services.*"
- Submission is of the opinion that the site does not fall within an 'accessible location' which is reflected and reinforced by Transport for Ireland's PTAL (public transport accessibility level) which identifies no service presently within the vicinity of the Old Conna lands. Also refers to Table 3.8 Accessibility of the compact settlement guidelines.
- Indicates that the only planned public transport in the local area, is the Bus Connects Bray to City Centre core bus corridor (approved under the Bord's reg ref:

ABP-317742-23) and the location of these stops are along the Old Dublin Road to the east of the M11.

- Offers an overview of measures that will be taken for existing bus stops like relocation. Notes the proximity of existing and approved stops to Old Connaught Avenue (circa 700m or an 8–10-minute walk). Acknowledges bus stops at a similar location – stop number 4201 (city bound) and 4129 (Bray bound).
- Provides a detailed description of existing bus services including the E1, 45A, and L14. Notes 24-hour operation for the E1 route and its 30-minute frequency during peak times. Highlights bus stops 2113 and 4417 due to their proximity to Old Connaught Avenue and because of the access they afford to the L14 route which operates every 2 hours from 6:30 AM until 22:30 PM.
- Notes the continuous footpath between Old Connaught and the Dublin Road which narrows in places and is exacerbated by the ad hoc placement of electrical poles and public street lighting. Cites concerns about the limited overlooking which in turn reduces passive surveillance along this route towards the nearest public transport stop and acknowledges no dedicated cycle paths are present alongside the footpath.
- Highlights an analysis of both existing and proposed public transport and submits that the only planned public transport that can be considered and used to inform densities within Old Connaught is the Bray to city centre core bus corridor given the lack of identification regarding the preferred Luas route from Brides Glen to Bray and the lack of guarantee that such a project will be advanced.
- Concludes that, following assessment against the Compact Settlement Guidelines, proposed LAP densities within the client's interest land range will fall within 35 to 50 dph and up to 100 dph in accessible locations.
- Suggests moderate density requirements at Old Connaught given the long-term nature and uncertainty around the Luas extension to Bray. Submission is of the opinion that there is no policy imperative or sound rationale to seek an average of more than 50+ dwellings per hectare for development.
- Offers a review of the residential density requirements outlined in the Draft LAP ranging from what the submission indicates as 40 dwellings per hectare at its western edge to 80-100 dwellings per hectare at its eastern edge as seen in Figure 4.2 of the Draft LAP.
- Recognises upper density ranges would comprise of primarily apartments as acknowledged in the Indicative Masterplan / Building Heights diagram incorporated in Figure 4.3 of the Draft LAP.
- References analyses outlined in OMP booklet accompanying submission which estimates the unit numbers and mix of dwelling types by reference to the density bands and by reference to that Indicative Masterplan layout in the Draft LAP. References a proposed average density of c. 65 units / hectare across the LAP lands and a mix of circa 33:67 houses to apartments/duplexes as well as the average density for the Central Character Area is c. 72 units / hectare and a mix of circa 25:75 houses to apartments/duplexes outlined in the Draft LAP. Notes a detailed OMP analysis set out in pages 9 – 14 of the OMP booklet.
- Submits that that a sustainable mix of housing typologies is imperative to make a success of the proposed new settlement at Old Conna. Emphasises the importance of creating a diverse resident mix with a balanced range of housing typologies which in turn creates a resilient community that can cater to the changing lifetime needs of residents in the area. Notes serious viability challenges in delivering apartments in all but the most prime locations, where the sales price can meet high construction costs and contribute to site and infrastructure costs.
- Submission is of the opinion that this viability challenge is evidenced by the extent to which the State has stepped in and is funding apartment construction through Local Authorities, the LDA and Affordable Housing Bodies as well as Government initiatives such as Croí Conaithe which helps bridge the viability gap for private apartment scheme delivery. Acknowledges the Government's advocacy for an

increased leverage of private capital to deliver housing in Ireland given the fast-changing geo-political international environment of today.

- Submission is of the opinion that the optimisation of own-door housing is the most effective and immediate means of enabling the deployment of private capital to deliver housing thereby reducing the reliance on State support and investment while also facilitating the creation of animated, active residential streets and quality place-making that emphasises compact, innovative housing supplemented by apartments rather than a predominance of apartments supplemented by housing as evidenced in the current draft of the LAP.
- Notes the acknowledgment of these realities via the Dun Laoghaire Rathdown Development Contribution Scheme 2023-2028. States the purpose of the scheme which is to provide exemptions from the payment of S48 Development Contributions including "social and affordable housing where funding is being provided by Central Government, Part V housing, housing being built by, or on behalf of the Council, the LDA and an Approved Housing Body" under section 7 (vii) and highlights the clear expectation for private house purchasers to contribute to physical and social infrastructure and the higher the required density of development, the lower the proportion of privately funded housing available to contribute to that infrastructure.
- Demonstrates understanding and appreciation regarding an intended, graduated approach to density generally rising from west to east, closest to the potential future Luas line, the Old Dublin Road bus corridor and the facilities and amenities within Bray.
- Requests a moderation in residential density requirements and broadening of density bands as this would increase flexibility, optimise the proportion of viable own-door housing at sustainable medium densities of development, in line with the provisions of the Compact Settlement Guidelines and facilitate a greater proportion of housing within Old Conna to have ability to contribute to the significant capital cost for required physical and social infrastructure enabling planned development as well as meeting Housing Strategy targets for the area. Includes Figure 5.5. from the OMP booklet as evidence to support this request which demonstrates an alternative density banding compared against the draft densities, within the client's interest lands.
- Highlights that the alternative density banding would allow for an uplift in density and higher densities nearest planned public transport (core bus corridor) and comply with Section 28 guidelines.
- Submits that residential density designations of 35 – 50 dph be applied towards the western edge and at sensitive locations, 50-60 dph should replace the current 60-80 band, and 60-100 dph should replace the 80-100 band. Submission is of the opinion that this alternative coupled with a consolidation of public open space provisions allows for the full realisation of the CDP Core Strategy requirements and more accurately aligns with Compact Settlement Guidelines requirements for this location, with its limited and uncertain future availability of public transport. Highlights that the broad nature of the highest density band provides flexibility to meet changing macroeconomic conditions and facilitate apartment developments of significance along the eastern edge of Old Connaught, should there ultimately prove to be a viable commercial exit for the development of apartments at scale.
- Outlines the indicative masterplan of the Draft LAP starting with Figures 4.3 ('Old Connaught Masterplan – Building Heights') and 4.2, which deals with land use and residential density.
- Details the inclusion of a sketched up indicative masterplan, identified apartment blocks, housing terraces across the entire LAP area as well as road network illustrations depicting points of access from link streets, local streets and cul-de-sacs.
- Notes a reference to the masterplan with respect to the housing mix for each Character Area in the Site Development Framework stating, "*Housing Mix* -



*Apartments and houses (generally in accordance with the built form illustrated in Figure 4.11."*

- Submission is of the opinion that the Draft LAP deals with issues like heights, uses, frontages, etc. in an atypical manner as opposed to the traditional, conceptual block form diagrams.
- Notes that the indicative masterplan is a version of how development can be delivered including densities and building heights prescribed and may not represent the optimum housing mix, typologies, a coherent and DMURS compliant street network, distribution of incidental open space, means and rate of car parking etc.
- Submission is of the opinion that the masterplan is unnecessarily detailed, represents an untested high-level sketch and is suggestive of a higher than necessary proportion of apartments under prescribed density bands.
- Cites concerns regarding potential undue emphasis attributed to the masterplan at Development Management stage to the detriment of a more detailed, potentially innovative design response within the different Character Areas.
- Recommends the Planning Authority to refer to the attached, detailed OMP booklet for a more, appropriate conceptual diagram to deal with key design parameters including land use, density, height and key frontages.
- Requests that the highly indicative and illustrative nature of that masterplan be acknowledged in the Draft LAP and that any reference to housing mix being in accordance with the built form in that masterplan be deleted altogether.
- Submission is of the opinion that the masterplan is unhelpful as well as needlessly hindering design innovation and the necessary degree of flexibility, within density and height parameters, to respond to the individual developer requirements.
- Suggests the inclusion of an 'upward modifier clause' with respect to the consideration of a potential additional floor beyond the Draft LAP-indicated building heights that allow a planning application to give detailed site-specific consideration to height and its ability to be assimilated successfully into the surrounding landscape.
- Highlights the benefit of this suggestion including the ability to afford an additional degree of flexibility allowing the Planning Authority to consider modest increases in height on a case-by-case basis, subject to justification by the Applicant and the demonstration of a suitable quality of design.
- Outlines public open space provision provided for in the current CDP within the Draft LAP boundary totalling to 11.95 hectares. Notes Figure 5.6 within the OMP booklet which visually demonstrates the additional 9.05 hectares designation for open space under the Draft LAP, representing a substantial uplift in open space zoning.
- Emphasises the provision increase in the Central Character Area resulting from the proposed the 'Active Park,' other designated open space and a regional attenuation pond / strategic infrastructure.
- Submission is of the opinion that the open space provision is unnecessarily high and compounded by an additional requirement for a further 10% of public open space to be provided within the residential development areas and results in an overall public open space requirement of circa 48% of the overall activated LAP lands.
- Highlights that 55% of total land within the client's interest falls under the Public Open Space requirement which also includes the regional attenuation pond.
- Offers a comparison between Woodbrook and Shanganagh LAP (2017-2023) public open space provision comprising of 18% of overall A1 zoned land complimented by incidental pocket parks within residential areas compared to Draft Old Conna LAP requirement which is approximately twice that of the Woodbrook-Shanganagh LAP.
- References the 'open space precedents' section of the OMP booklet which provides further insight to Woodbrook and other comparable residential landbanks within Dun Laoghaire-Rathdown and beyond.

- Submission is of the opinion that the extent of public open space proposed for Old Conna is not justified by reference to the Draft LAP, ICAS or CDP and an overprovision like this displaces much needed new housing and further increases the overall capital cost of prescribed (social) infrastructure to be borne by the proposed housing.
- Highlights high amenity, semi-natural, quasi-rural environment of Old Conna as well as existing public (e.g., Shanganagh Park) and private open spaces (e.g. golf courses, sports clubs, woodlands, walking trails and the coastline) to utilise instead of commencing works on new public open space provisions. Notes accessibility to Shanganagh Park will improve upon construction of the planned new bridge crossing to the Old Dublin Road at Woodbrook.
- Details proposed Active Park and School site including total size (7.13 Ha) and its location adjoining Allies River Road to the west and the regional attenuation pond / 'strategic infrastructure' to the east. Notes that the combination of these two proposed projects covers the full extent of the designated Strategic Land Reserve, c. 10.5 hectares, which is located to the south of Allies River Road.
- Submission is of the opinion that the land parcel is considerable and somewhat fragmented wrapping around the Ferndale Court apartment development as well as being traversed by the main north/south spine street towards the east of the Draft LAP area.
- Objects to the description of the area as 'an indoor and outdoor recreational and cultural campus' and questions the lack of detail regarding what sports and built facilities are envisaged, funding sources and who will operate these facilities. Notes the suggestion that there is synergy in locating the proposed 1.6 hectare primary school site within this park/campus.
- Provides a description of the proposed active park and school including details regarding the size of each site (5.5 hectares and 1.6 hectares respectively) as well as the location of the sites in relation to Old Connaught Avenue and Ferndale Road.
- Notes that the school site contains substantial frontage onto that key east/west link between Ferndale Road and the main north/south spine street connecting Old Connaught Avenue to Rathmichael.
- Highlights that this location displaces potential designated residential development lands and would result in a significant stretch of that key north/south spine street lacking an active street frontage and its associated benefits of animation, passive surveillance and a traffic calming effect.
- Submission is of the opinion that the spine street would function more as a distributor road as it traverses the park as well as not functioning as an optimum location for discouraging car movements to the school and encouraging active travel alternatives getting to and from the school.
- References the planning principles in the National Transport Authority's 'Safe routes to school design guide' published in 2022 set out under section 1.8.
- Notes that a fundamental guiding principle for site selection requires access by walking, cycling and public transport as a key determinant.
- Advocates for ensuring such provisions in LAPs reduce car dependency to and from schools.
- Recommends an alternative location for the Active Park and Primary School within the GB zoned lands off Thornhill Road, adjoining to the south of the Southern Character Area instead of along a key vehicular circulation route on the basis that the location would facilitate a wider interconnected network of open space and active travel routes, linked to each character area and would define the southern boundary of Old Connaught.
- Highlights that this alternative would not displace designated land of strategic residential development potential, and the submission is of the opinion that it would better respond to policy objectives outlined in the NTA's Safe Routes to School Design Guide.

- Submission is also of the opinion that this location adjacent to St. Gerard's would enhance the potential for co-operation and perhaps the shared use of certain facilities.
- Refers to Figure 5.7A in the submission which depicts the alternative option for the proposed active park and school site in the southern character area.
- Offers an additional second alternative consideration that the active park and school be consolidated in the area and positioned to the west around that section of Allies River Road which is intended to be redesigned as an active travel route.
- Supports the basis of this alternative scenario by noting a consolidated location could safeguard tree protection objectives in the CDP along Allies River Road and could also incorporate the Glendoo Mountain to Shanganagh Wildlife Corridor, an objective of the DLR Biodiversity Action Plan 2021-2025, providing enhanced green corridor connectivity and amenity for residents and visitors in the area.
- Submission is also of the opinion that this approach could free up the eastern half of the Strategic Land Reserve for future residential development, optimise the use of the scarce urban resource and promote the realisation of a continuous link street with active residential frontages along its full length from Old Connaught Avenue to Rathmichael.
- Refers to Figure 5.7b in the submission which offers an alternative layout of open space for the proposed active park and school site.
- Submission is of the opinion that the location of the regional attenuation pond on the client's lands within the Central Character Area is inappropriate and merits reconsideration given the considerable overall land take as proposed from these lands.
- Recommends that the regional attenuation pond and associated 'strategic infrastructure' decrease in size with each Character Area having to deal fully with surface water attenuation on-site.
- Submission is of the opinion that this recommendation is a fair and reasonable requirements for each Character Area, in line with GDSDS policy on sustainable urban drainage and surface water attenuation in urban areas.
- Objects to the extent of zoned residential land along the eastern edge of the Central Character Area and is of the opinion that it has been effectively sterilised by a long-standing and currently shelved road proposal involving a potential upgrade to the M11 including a full 4-way interchange at Wilford Junction.
- Emphasises commitment to advancing the M11 bridge crossing and link to the Old Dublin Road as envisaged under the Draft LAP.
- Requests that residential zoning of affected land be retained with hatched road improvement objective overlaid as this would assist in releasing these lands for residential development if, and when, Central Government confirms that this interchange proposal has been abandoned and is no longer a roads objective.
- Requests that an objective to that effect be included in the final Old Conna LAP in the interests of active land management and the sustainable use of zoned and serviced residential land.
- Emphasises commitment to work positively and proactively in the realisation of the broad overall vision for Old Connaught and urges the Planning Authority to acknowledge the inequitable and unequal asks on the lands of client interests as well as considering alternative scenarios previously outlined.
- Outlines the phased development programme provided in the Draft LAP.
- Positively comments on the broad sequential direction of development and notes satisfaction with inclusion in Phase A and sub-phase 1.
- Submission is of the opinion that the phasing requirements are too prescriptive, and the timing is too delayed which restricts the progress of other key landowners regarding development on their lands.
- Recommends an increase in housing numbers earlier in the phasing and at a moderated residential density to fund the key enabling infrastructure as set out in the Draft LAP.

- Highlights limited numbers in Phase 1 as well as excessive density therein at circa 80 units / Ha, comprising some 80% apartments, which will not effectively generate capital towards meeting the cost of the required infrastructure.
- Suggests the Planning Authority facilitate some development in the Southern Character Area sooner to proceed without delay, upon adoption of the Old Conna LAP, with the necessary Development Plan Variation to bring forward the Northern Character Area for development.
- Highlights the need for approval from the three key developer stakeholders regarding a visible 'pipeline' of housing supply to leverage the certainty of future house sales to generate the necessary funding to contribute to the significant capital cost of the required infrastructure.

#### Conclusion:

- Notes this unique opportunity to provide for the delivery of a sustainable new residential settlement of scale at Old Connaught which will significantly contribute to housing delivery and necessary supporting infrastructure and amenities. Submission is of the opinion that Old Connaught is a well-positioned but long overlooked location at the edge of the Key Town of Bray.
- Welcomes the preparation of the Draft LAP for Old Connaught with input from Castlethorn as a well-established and experienced developer with a significant land interest within the Draft LAP boundary.
- Concludes with requests to address the key areas of concern prior to the adoption of the Old Connaught LAP.

The submission includes three accompanying booklets and are summarised as follows.

1. Analysis of Old Connaught Draft Local Area Plan:
  - Focuses on net developable area and depicts a map detailing the interest of Castlethorn both inside and outside of the LAP boundary. Includes the total amount of lands within client's interest (33.21 hectares), gross LAP lands within client's interest (25.77 hectares), and gross non-LAP lands within client interest (7.44 hectares) as well as key highlighting the difference between client interest, lands within and outside of the LAP boundary.
  - Notes that 62.1% of the LAP lands within the client's interest is proposed for non-residential uses and a further 1.75 hectares of lands within the client's interest - to the east of the N11 - will deliver additional enabling infrastructure outside the LAP boundary. Includes maps demonstrating the total allocations and percentages of the Castlethorn lands of interest proposed for non-residential uses which are as follows:
    - Active Park and School (7.13 hectares): 27.7%
    - N11/M11 Reservation (3.32 hectares): 12.9%
    - Key Avenues (1.91 hectares): 7.4%
    - Strategic Infrastructure (1.82 hectares): 7.1%
    - Public Open Space (1.01 hectares): 3.9%
    - Luas Reservation (0.80 hectares): 3.1%
  - Includes a map detailing the net developable area illustrating the allocations and percentages of both non-residential and residential lands within the Castlethorn lands of interest inside the LAP boundary which are as follows:
    - Residential (9.77 hectares): 37.9%
    - Non-residential (16.00 hectares): 62.1%
  - Provides a list of net developable areas (including allocations and percentages) across the Draft LAP character areas on the basis of residential and non-residential uses which are as follows:
    - Central CA (31.17 hectares): 42.5% residential lands and 57.5% non-residential lands

- o Village Core (2.88 hectares with potential for additional residential lands within backland/gardens): 50.7% residential lands and 49.3% non-residential lands
- o Northern CA (36.25 hectares): 55.8% residential lands and 44.2% non-residential lands
- o Southern CA (9.89 hectares): 74.1% residential lands and 25.9% non-residential lands
- o Western CA (22.53 hectares): 77.8% residential lands and 22.2% non-residential lands

## 2. Density and Mix:

- Focuses on the theme of density & mix within an accompanying booklet of maps.
- Highlights that the calculations regarding density and mix within the booklet are based on the methodology utilised in Figure 4.2 of the Draft LAP, Old Connaught Masterplan, which defines zones for land use and residential density. Notes that the areas of zones shown in the diagrams were measured and figures were calculated based on density ranges noted in the Draft LAP.
- Includes a visual reference of Figure 4.2 in the booklet.
- Highlights Figure 4.3 of the Draft LAP, Old Connaught Masterplan - Building Heights, its indication of an arrangement of building typologies which were then counted and utilised to make the following assumptions:
  - o Blue 2 storey terraced units, with a footprint of c. 8m x 5m, are counted as a 1 no. house;
  - o Purple 3 storey end of terrace units, with a footprint of c. 11m x 8m, are counted as 2 no. duplexes.
  - o 3, 4 & 4+setback units, with a footprint depth of c. 18m, are counted as apartment blocks; We have assumed that the apartment blocks are between 12-16 units per floor, with 12 being used to indicate the lower range, and 16 to indicate the upper range.
- Includes a visual reference of Figure 4.3 in the booklet.
- Provides a detailed description of the overall density and mix for the Draft LAP regarding land use and residential density including figures for the total residential zoned lands (37.01 hectares), no. of units based on LAP net-residential densities (2,183 – 2,637), density range (59 -71 units per Ha), housing mix range – houses: apartments/duplex (42:58 – 26:74), and a land use & residential density layout map based on Figure 4.2 of Draft LAP.
- Notes this extrapolated mix is based on top and bottom density band consideration of comparable precedents.
- Provides a detailed description of the overall density and mix for the Draft LAP regarding building heights, including figure 4.3 of the Draft LAP, for the no. of units stated within Draft LAP (2,150 – 2,400), no. of units estimated based on building heights plan (2,147 – 2,549), density range (58 - 69 units per Ha), housing mix range – houses: apartments/duplex (33:67 – 28:72), and a building heights layout map based on Figure 4.3 of Draft LAP.
- Notes this mix is based on lower and higher unit figures and estimation having regard to LAP Indicative Masterplan as seen on page 10 of the OMP Booklet: Part 2.
- Provides a detailed description of the Central CA density and mix for the Draft LAP regarding land use and residential density including figures for the total residential zoned lands (13.03 hectares), no. of units based on LAP net-residential densities (824 – 1,051), density range (63 - 81 units per hectare), housing mix range – houses: apartments/duplex (36:64 – 17:83), and a land use & residential density layout map based on Figure 4.2 of Draft LAP.
- Notes this extrapolated mix is based on top and bottom density band consideration of comparable precedents.

- Provides a detailed description of the Central CA density and mix for the Draft LAP regarding building heights including figures for the no. of units stated within Draft LAP (800 – 1,000), no. of units estimated based on building heights plan (807 – 953), density range (62 – 73 units per Ha), housing mix range – houses: apartments/duplex (28:72 – 24:76), and a building heights layout map based on Figure 4.3 of Draft LAP.
  - Notes this mix is based on lower and higher unit figures and estimation having regard to LAP Indicative Masterplan as seen on page 10 of the OMP Booklet: Part 2.
  - Provides a detailed description of the Sub Phase 1 density and mix for the Draft LAP regarding land use and residential density including figures for the total residential zoned lands (5.45 hectares), no. of units based on LAP net-residential densities (377 – 487), density range (69 – 89 units per hectare), housing mix range – houses: apartments/duplex (29:71 – 10:90), and a land use & residential density layout map based on Figure 4.2 of Draft LAP.
  - Notes this extrapolated mix is based on top and bottom density band consideration of comparable precedents.
  - Provides a detailed description of the Sub Phase 1 density and mix for the Draft LAP regarding building heights including figures for the no. of units stated within Draft LAP (450), no. of units estimated based on building heights plan (392 – 480), density range (72 – 88 units per Ha), housing mix range – houses: apartments/duplex (23:77 – 19:81), and a building heights layout map based on Figure 4.3 of Draft LAP.
  - Notes this mix is based on lower and higher unit figures and estimation having regard to an LAP Indicative Masterplan as seen on page 10 of the OMP Booklet: Part 2.
  - Provides a detailed description of the density and mix in the Central CA based on Figure 4.2 within the Draft LAP regarding land use and residential density including figures for the total residential zoned lands (13.03 hectares), no. of units based on LAP net-residential densities (824 – 1,051), density range (63 – 81 units per hectare), housing mix range – houses: apartments/duplex (36:64 – 17:83)
  - Notes this extrapolated mix is based on top and bottom density band consideration of comparable precedents.
  - Provides a detailed description of a consideration of an alternative for the Central CA for density and mix within the Draft LAP regarding land use & residential density alternative including figures for the no. of units stated within Draft LAP (800-1,000), no. of units achievable by reference to moderated density bands (685 – 955), density range (49 – 68 units per hectare), housing mix range – houses: apartments/duplex (57:43 – 28:72), and a land use and residential density map based on Figure 4.2 of Draft LAP.
  - Notes this mix is based on lower and higher unit figures and estimation having regard to an LAP Indicative Masterplan as seen on page 10 of the OMP Booklet: Part 2.
3. Open Space:
- Focuses final submission on the theme of open space, precedents, urban design diagrams and other considerations within the accompanying booklet of maps prepared by OMP.
  - Details zoned open space as outlined in the CDP including a map highlighting the open spaces within the LAP boundary and the following figures:
    - o Total zoned open space: 11.95 hectares
    - o Total zoned Objective A1 – New Residential: 66.62 hectares (84.8%)
    - o Total zoned Objective F – Open Space: 11.95 hectares (15.2%)
    - o Combined Zoned Area: 78.57 hectares (100%)

- Details additional zoned open space within the Draft LAP including a map highlighting LAP development area, existing and proposed open spaces, and future residential lands and the following figures:
  - Draft LAP Development Area (39.35 hectares): 51.2%
    - Residential Lands (37.01 hectares)
    - Neigh. Centre (1.46 hectares)
    - Loc. Reg. Centre (0.88 hectares)
  - Future Residential Lands (20.25 hectares): 26.0%
  - Public Open Space (9.05 hectares): 11.6%
  - Active Park: (7.13 hectares): 9.2%
  - Strategic Infrastructure (2.14 hectares): 2.7%
  - Combined Zoned Area (77.92): 100%
- Details figures regarding aggregate of green infrastructure and uses and figures regarding aggregate of green infrastructure & uses inclusive of additional 10% public open space within residential development areas within the Draft LAP which are as follows:
  - Aggregate of green infrastructure and uses – residential lands: 39.35 hectares (57.5%)
  - Aggregate of green infrastructure and uses – open space Draft LAP: 28.75 hectares (42.5%)
  - Aggregate of green infrastructure & uses inclusive of additional 10% public open space within residential development areas -- residential lands: 35.65 hectares (52.3%)
  - Aggregate of green infrastructure & uses inclusive of additional 10% public open space within residential development areas -- open space Draft LAP: 32.45 hectares (47.7%)
- Includes a map outlining the residential lands, open spaces noted in the CDP, open spaces noted in the Draft LAP, proposed active park and proposed strategic infrastructure (incl. regional pond) in the context of lands within the client's interest and the Draft LAP boundary.
- Focuses next section on precedents including Woodbrook LAP 2017 – 2023, Cherrywood SDZ 2023, Adamstown SDZ 2003, and Draft Kiltiernan-Glenamuck LAP 2025. Includes maps depicting area, area boundaries and covers for each LAP. Highlights density, housing mix and open space provisions which are as follows:
  - Density
    - Woodbrook: 60 units per hectares (Average Minimum)
    - Cherrywood: 82-117 units per hectares (Average Minimum)
    - Adamstown: 53-64 units per hectares (Average Minimum)
    - Kiltiernan-Glenamuck: 40-80units per hectares
  - Housing Mix
    - Woodbrook: 50:50 (Houses:Apartments)
    - Cherrywood: N/A
    - Adamstown: N/A
    - Kiltiernan-Glenamuck: N/A
  - Open Space
    - Woodbrook: 3.3 hectares (15.5% of Overall Lands)
    - Cherrywood: 64.5 hectares (25% of Gross site Area or 33.5% of Net Developable & Amenity Areas)
    - Adamstown: 23.3 hectares (13% of Net Developable & Amenity Areas)
    - Kiltiernan-Glenamuck: 18.3 hectares Approx (24% of Net Developable & Amenity Areas)
- Emphasises that the figures referenced on the Woodbrook precedent page in the booklet differ from the permitted development below.



- Provides further information related to the Woodbrook LAP 2017 – 2023 in the form of two applications for residential schemes under Phase 1 and Phase 2.
- Highlights that the Phase 1 scheme proposed 682 no. units to be built, with density rates of 78units per hectare and a housing mix of 30:70.
- Highlights that the Phase 2 scheme proposed 479 no. units to be built, with density rates of 94units per hectare and a housing mix of 22:78.
- Notes the overall density between the two schemes as 83.5 units per hectares, overall unit mix as 27:77 and overall open space amounting to 3.4 hectares (15.8% of Overall Lands)
- References Masterplan drawing in the Draft LAP which suggests a detailed site layout, with building typologies, street networks and clearly defined open spaces.
- Emphasises a preference for a more abstract, Urban Design Diagram to be utilised in lieu of the current masterplan which includes generic urban blocks, height ranges and a movement strategy like the Key Sites Framework Strategy in Chapter 4 of the Woodbrook - Shanganagh LAP.
- States that the Draft Old Connaught LAP diagrams should be accompanied by notes such as those utilised in the Woodbrook - Shanganagh LAP, i.e. "These diagrams are indicative in nature and provide guidance on how the related provisions of the plan can be achieved."
- Requests the removal or replacement of objective from Table 4.6, Section 4.4.6.2, "Apartments and houses (generally in accordance with the built form illustrated in Figure 4.11)" in the Draft LAP.
- Includes an indicative masterplan for the Draft LAP area utilising the block concept with a smaller visual referencing the Woodbrook – Shanganagh masterplan block layout.
- Notes the Draft LAP masterplan drawing contains a street network indicating a minimum number of access points from the primary road reservations into the development areas, with local street networks traversing within development areas containing turning heads and some situations where local streets run adjacent to the primary roads, akin to the traditional Local Distributor Road network in traditional suburban arrangements.
- Emphasises a preference for an Urban Design Diagram promoting an integrated street network, in compliance with DMURS, with the primary routes functioning as Multi-Functional Streets, providing multiple access points into the development areas which facilitate access to local loops and homezones, thereby creating permeable neighbourhoods and minimising the use of development area for road provision.
- Includes a map outlining the proposed movement strategy by Castlethorn with a legend highlighting changes in the primary vehicular route, local street/homezone, active travel route and the bridge as well as a smaller visual referencing the Woodbrook – Shanganagh movement strategy.
- Notes the Draft LAP masterplan drawing prescribes heights for the building typologies contained. Submission is of the opinion that there is little flexibility in this diagram.
- Emphasises preference for an Urban Design Diagram that indicates the locations of key edges, and suggests a range of appropriate heights, offering flexibility to the developer over the lifetime of the LAP.
- Includes a block concept layout map of building heights, a legend referencing the different storey levels and significant frontage as well as a smaller visual referencing the Woodbrook – Shanganagh building heights strategy.
- Highlights that an Urban Design Diagram can be adapted to indicate locations for proposed uses, including residential, educational, mixed-use, public open space etc.
- Notes that the Draft LAP masterplan drawing suggests locations for the provision of the 10% of the net residential area that must be provided as public open space

<p>and prescribes significant areas of zoned public open space in addition to the lands which are zoned public open space in the DLRCC Development Plan.</p> <ul style="list-style-type: none"> <li>• Suggests the locations of the 10% provision of the net residential area as public open space should be at the discretion of the developer and remain flexible.</li> <li>• Includes a block concept layout map detailing a land use diagram as well as a smaller visual referencing the Woodbrook – Shanganagh land use diagram.</li> <li>• Details a list of alternative layout considerations within the Draft LAP such as: <ul style="list-style-type: none"> <li>◦ Active Park consolidation around Allies Road Active Travel and school site</li> <li>◦ Proposed school site with frontage on east-west link</li> <li>◦ Preservation of Strategic Reserve for Future Residential Lands</li> <li>◦ Facilitation of active land uses and built frontages along North/South link street to provide passive surveillance and a traffic calming influence.</li> </ul> </li> <li>• Notes that Castlethorn proposed alternative layout will meet some but not all of the NTA's "Safe Route to School Design Guide" requirements.</li> <li>• Includes a block layout map of the alternative layout considerations within the Draft LAP boundary.</li> <li>• Details a list of alternative layout considerations within the Draft LAP such as: <ul style="list-style-type: none"> <li>◦ Active Park &amp; School relocates to existing Strategic Reserve Land with potential for synergy with St. Gerards.</li> <li>◦ Expanded and interconnected Open Space network that defines the southern extent of Old Connaught.</li> <li>◦ The school location being principally served by active travel routes rather than distributor road links.</li> <li>◦ Preservation of Strategic Reserve for Future Residential Lands.</li> <li>◦ Relocated school location can meet all of the NTA's "Safe Route to School Design Guide" requirements.</li> <li>◦ Strategic Land Reserve optimised for residential delivery underpinning strategic designation.</li> <li>◦ Enhanced passive surveillance of key linkages between Old Connaught North and the Central Area.</li> </ul> </li> <li>• Includes a block layout map of the alternative layout considerations within the Draft LAP boundary.</li> </ul>
<p><b>Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):</b>  Chapters 4, 5, 6, 8, 11 and Other Issues</p>

<b>DLR Submission No: B0061</b>	<b>Person: Adam Connors</b>	<b>Organisation:</b>
<p><b>Summary of Submission / Observation:</b></p> <ul style="list-style-type: none"> <li>• Cites concerns regarding the proposed Local Area Draft Plan as it relates to access for the individual's parent's home at New Bawn, Old Connaught Avenue, which could be impacted by proposed development.</li> <li>• Raises issue with road access and connectivity as it relates to the proposed plan to convert Old Connaught Avenue into a bus and cycle lane, with a gate installed just after the bridge. Notes that during a recent Draft Plan consultation meeting they were informed that residents on Old Connaught Avenue would either pass through the bus gate for access or take a detour via Thornhill Road. Emphasises deep concerns as Thornhill Road is narrow, unsuitable for two-way traffic, unsafe and an impractical route for regular use by residents and visitors. Highlights a discussion held around an alternative route using the Old Connaught exit from the N11 and requests clarity regarding how the area can function as a dedicated bus and cycle lane if general access through Old Connaught Avenue is possible for private vehicles.</li> </ul>		

- Urges the council to reconsider these restrictions on Old Connaught Avenue or to propose a solution maintaining convenient and safe access to homes for both residents and visitors as this change would significantly impact the individual and their family's lives.
- Cites concerns with the new planned development area located next to the family home specifically the new proposed housing which will be situated at the bottom of the individual's garden related to privacy and overlooking of the individual's family home.
- Requests consideration for retention of access to an informal walking route behind the individual's home which adds value to their daily life and would represent a significant loss or the potential to link the informal access route to the new proposed road network to the adjoining field.
- Raises issue with the proximity of new housing to the individual's family home and its negative impact regarding loss of privacy, open space and access to surrounding land as well as quality of life and property value.
- Requests the council reconsider aspects of the Draft Plan affecting Old Connaught Avenue residents as it is essential that access, privacy and existing community use of the surrounding land is accounted for and protected. Offers the opportunity for further discussion or clarification regarding these issues as the plan progresses.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapters 4 and 6

**DLR Submission  
No: B0062**

**Person: Rory Breslin**

**Organisation:**

**Summary of Submission / Observation:**

- Submission expresses concerns regarding the proposed transport and infrastructure elements in the Draft Local Area Plan, particularly in the context of the long-term plan to add 2,500 households in the area.
- The submission notes concern with proposals to close Old Connaught Avenue to general vehicle use without a viable alternative. It states the proposed M11 overbridge does not address the needs of the area as it will elongate journeys to the M11 and be heavily congested with the new developments at Woodbrook and Shanganagh.
- The submission requests a new direct access route onto the M11 from the LAP area to avoid an increase in traffic on Thornhill Road.
- The submission notes concerns regarding reduced accessibility to Bray Emmets GAA club because of the bus gate proposals and urges the Council to consider investment in additional playing pitches and facilities in the plan to support the expected growth in community sports participation.
- Submission indicates that the proposed bus corridor along Old Connaught Avenue is a positive step but insufficient on its own and notes that the LUAS must be prioritised as soon as possible in the plan to reduce car dependency in the area.
- The submission welcomes the inclusion of active travel in the Draft Plan. However, it notes connectivity to adjacent areas must be implemented to help reduce car dependency.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapters 6 and 8

**DLR Submission  
No: B0063**

**Person: Laura  
Olson**

**Organisation:**

**Summary of Submission / Observation:**

- Submission is of the opinion that the plans have not taken the current residents of the area into consideration regarding the access and use of the surrounding

<p>area for recreational purposes which will be constricted during construction phases and shift the area from countryside to residential.</p> <ul style="list-style-type: none"> <li>• Submission is of the opinion that the plans indicate that Phase 1 will be built without upgrading existing infrastructure. Enquires about what plan for construction traffic during initial phases has been determined given the existing congestion on Old Connaught Avenue.</li> <li>• Notes that Phase 1 is to be built on septic tanks and highlights that 1,189 Domestic Waste Water Treatment System (DWWTS) inspections were completed by local authorities in 2023 and 45% of DWWTS failed inspection with many systems identified as a risk to human and environmental health. Enquires how this fits within the stated sustainable nature of the Draft Plan.</li> <li>• States that there is no evidence of collaboration with Bray Town/Wicklow Council in the plan which shares the county border. Notes the impact that planning permission and application for the 1,200 homes at Sea Gardens nearly opposite the bottom of Old Connaught Avenue will have on the Dublin Road artery to Wilford roundabout.</li> <li>• Emphasises the need for collaboration between LAPs for Bray, Rathmichael and Kilternan due to potential impact.</li> <li>• Cites concerns about the lack of commitment from the Department of Education for schools in the area as well as the National Transport Authority to bring the LUAS/build roads in the area.</li> <li>• Raises issue with the lack of commitment for other amenities like healthcare, etc.</li> <li>• Notes that Phase 1 could bring an additional 1,000 residents to the area with no upgrade to current infrastructure and resources thus impacting existing residents and their surroundings.</li> </ul>
<p><b>Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):</b>  Chapters 5, 6, 11 and Other Issues</p>

<b>DLR Submission No: B0064</b>	<b>Person: Glenveagh Homes Ltd.</b>	<b>Organisation: Glenveagh Homes Ltd.</b>
<p><b>Summary of Submission / Observation:</b></p> <p><b>EXECUTIVE SUMMARY</b></p> <ul style="list-style-type: none"> <li>• Notes that the submission was prepared by John Spain Associates on behalf of Glenveagh Homes. Submission is of the opinion that the landowner is the largest and most affected within the boundary of the Draft LAP.</li> <li>• States that the purpose of the requested amendments is to ensure the implementation of delivering much-needed housing as it relates to the extent of the substantial Glenveagh landholding (c. 27.8 hectares) and delivering the associated key required enabling and social infrastructure alongside development.</li> <li>• Highlights positive aspects of the Draft LAP and evidence that an extensive amount of work was undertaken during its drafting.</li> <li>• Submission is of the opinion that the phasing of the Draft LAP is overly prescriptive (akin to a Planning Scheme) and lacks flexibility in the wording to provide for viability of development, facilitate the timely delivery of housing with necessary provision of physical and social infrastructure.</li> <li>• Objects to the lack of flexibility on timing, phasing, heights and density ranges as it will unnecessarily delay provision of housing given Glenveagh's ability to bring forward key infrastructural facilities in a timely manner.</li> <li>• Refers to current DLR County Development Plan core strategy allocations for the period 2022-2028 regarding the lands at Old Connaught.</li> <li>• Submission is of the opinion that the envisaged c. 2,000 units identified in the current DLR CDP, will not be delivered within the remaining period of the DLR CDP given the currently worded phasing in the Draft LAP.</li> </ul>		

- Notes that Glenveagh employed a design team that is working towards lodging an integrated design for their landbank within Old Connaught, which will result in the delivery of much needed dwellings over the next few years.
- Notes section 19(2) of the Planning and Development Act 2000, as amended, requires that a local area plan "shall be consistent with the objectives of the development plan".
- Highlights that the Act does not provide for the downzoning of land as part of the Local Area Plan process, and if the Draft LAP is adopted as currently proposed this will, in effect, be the position that is being taken by the Planning Authority, with regard to the proposed land uses within Glenveagh's landholdings.
- Highlights Section 95 (1) of the Planning Act 2000 (as amended) which requires planning authorities to:  
"ensure that sufficient and suitable land is zoned for residential use, or for a mixture of residential and other uses, to meet the requirements of the housing strategy and to ensure that a scarcity of such land does not occur at any time during the period of the development plan." (emphasis added).
- Cites concerns regarding Draft LAP indicated reductions of the amount of residential zoned land in the LAP area, (through the identification of excessive open space areas) which is exacerbated by the current phasing meaning that some 78% of the zoned land cannot be brought forward for development along with the associated number of much needed housing which would contribute towards the Council meeting its statutory requirements in respect of the housing strategy.
- States Glenveagh's overall landholding and notes that the current arrangement of the Draft LAP includes some 5.81 hectares of strategic open space resulting in some 21% of the Glenveagh lands being assigned an open space use.
- Refers to the provisions of the Compact Settlement Guidelines 2024 as well as the Draft LAP (requiring an additional 10% provision) to demonstrate the justification of considering the series of substantial parks in this context as excessive, particularly where an additional 10% of open space within the remaining net A1 zoned development parcels (c. 1.72 hectares) is being sought over and above the 21% above.
- Supports the sustainable development of the landbank, including careful restoration of Jubilee Hall within an appropriately framed layout.
- Submission is of the opinion that the current Draft LAP proposals are detrimental to the interests of Glenveagh and would deliver a sub optimal form of development.
- Cites concerns regarding the reduction of development potential for Glenveagh's landholding in Draft LAP that contradicts the zoning provisions of the County Development Plan.
- Highlights challenges with translating conceptual high level key structuring principles into workable viable layouts for future planning applications.
- Submission is of the opinion that the Draft LAP will have the opposite effect of placing the Draft LAP lands within a 'mothball' unable to be developed in the short-term.
- Submission is of the opinion that there is no justification for placing Glenveagh's lands as subsidiary to Phase A when the lands can deliver upon the key objectives of the Draft LAP including facilitation of infrastructure without other landholders (e.g. a strategic foul pumping station, looped watermain, surface water attenuation etc.), placemaking, open space and retail/retail services.
- Requests that Glenveagh's lands are equal in terms of phasing compared to the lands (Phase A), located to the north of Old Connaught Avenue and that Map 11.1 is amended to reflect same.
- Submission is of the opinion that the development of Glenveagh lands would clearly provide enabling infrastructure, contribute towards the delivery of other parcels of land and is appropriate for development now having regard to:
  - the existing services and facilities present within the southeastern quadrant of the Old Connaught Draft LAP lands; Bray Emmets GAA club accessed off Old

- Connaught Avenue and St. Gerards Schools located on the eastern side of Thornhill Road,
- the built-up area of Bray along Old Connaught Avenue which will form the primary transport link to the existing urban area,
  - Existing and under construction services. The southern lands at Old Connaught are best served by existing service and utilities networks including water services, ESB, Gas and other utility networks.
  - Highlights that the spatial layout of the Draft LAP further 'copper fastens' the Glenveagh landholding as the preferable land bank within the LAP through:
    - The identification of the village core at the junction of Old Connaught Avenue, Ferndale Road and Thornhill Road – Development should be most proximate to the core, given preference and first zoned/phased for development. The development of the GVH landbank as Phase A will deliver neighbourhood scale retail facilities for the area.
    - The restoration of Jubilee Hall as a key community asset/hub for the Draft LAP lands.
    - The delivery of significant road improvements entirely within the control of Glenveagh Homes and circulation routes which will benefit the existing Draft LAP area such as:
      - Link road between Old Connaught Avenue and Thornhill Road.
      - Link road between Thornhill Road and Ballyman Road.
      - Link road between Ballyman Road and Ferndale Road.
    - Unlocking DLRs Landbank located at the western end of the LAP.
    - The location of the potential ESB Substation upgrade is on Glenveagh lands.
    - Delivery of the looped watermain.
    - Delivery of significant areas of open space within the Glenveagh landholding.
    - The southern lands at Old Connaught are optimally served by existing service and utilities networks including water services, ESB, Gas and other utility networks.
    - The ability of the Glenveagh lands to provide an optimal location for a foul pumping station/alternative interim solution to serve the Draft LAP lands, which isn't located within the M11 upgrade reservation.
    - The surface water proposals (southern attenuation pond) within Glenveagh lands can serve the Glenveagh/DLR lands.
  - Recommends amendments to Table 11.2 of the Draft LAP allowing for alternative/interim solutions to the delivery of infrastructure to ensure the sustainable development of the lands alongside appropriate delivery of infrastructure and housing.
  - Requests that there is no requirement for restrictive phasing in the Draft LAP so that Glenveagh homes Ltd. can deliver necessary infrastructure.
  - Recommends the Council collaborate with Glenveagh and other landowners to ensure the timing of the delivery of the necessary infrastructure is in place.
  - Notes that with reference to the Western Character area (Glenveagh Plots B and C), the significant Uisce Eireann wayleave has not been taken into account in the Site Development Framework for the Western Character Area.
  - Provides details regarding the wayleave including that it splits the site from Ferndale Road in the north, traverses Ballyman Road and then follows Thornhill Road where it crosses the future Luas reservation.
  - Emphasises the need for reconsideration and notes Glenveagh includes a concept layout in the submission prepared by Deady Gahan Architects (DGA) in Appendix 5.
  - Refers to Development Plan Guidelines which state that phasing may be appropriate where "there is a surplus" of zoned land.

- Submission is of the opinion that given the context of Old Connaught, the development of the Draft LAP lands is a key element of contributing towards the core strategy population targets for the current 2022-2028 DLR CDP.
- Cites concerns about the inherent inflexibility included in the current wording of the Draft LAP which leaves the possibility of no development taking place at all within the LAP area which is an extraordinary potential outcome given the extensive work undertaken by DLR in preparing the Draft LAP as well as the developer who has a full design team in place seeking to bring forward an integrated development which will deliver housing.
- Requests Phase A be assigned to the Glenveagh/DLR landbank and that the phasing table not include elements which cannot be delivered due to circumstances outside the control of landowners.
- Highlights that development cannot exceed infrastructure capacity based on the development consent process and the appropriate forum for statutory bodies to assess the capacity of infrastructure and alternative measures to upgrade the infrastructure so that development can be facilitated.
- Submission is of the opinion that there is a significant emphasis on phasing constraining development.
- Includes a section outlining recommendations the Draft LAP including:
  - Greater flexibility in the phasing to allow for development to be delivered in tandem with the necessary infrastructure which can include alternative solutions, with the agreement of the Local Authority/Uisce Eireann. The entirety of the Glenveagh lands should be placed in Phase A. The phasing of the Draft LAP should be reconsidered so that the delivery of infrastructure is linked through an overall number of dwellings rather than spatially. This would allow c. 2,000 dwellings to be in the first phase, which would allow alternative measures to allow for the necessary infrastructure to be delivered in tandem with development. There is no justification for the inclusion of a requirement for the construction of a bridge across the M11 having regard to the proximity to services in Bray and the ability to provide a high-quality bus-based environment within the Draft LAP lands.
  - Revisions to Phasing Table relating to our clients' lands as set out in section 2.7 of the submission.
  - Relocation of strategic Thornhill Park west of Thornhill Road to the East of Thornhill Road (due to challenging topography).
  - That the concept layouts as set out for the western character area takes into account the significant Uisce Eireann wayleave and are updated as per the enclosed Deady Gahan Architects layout in the enclosed DGA booklet (Appendix 5).
  - Amending densities as per the following: Glenveagh Plot A = 60 dph, Glenveagh Plot B = 40-50 dph, Glenveagh Plot C = 35 - 50 dph.
  - Inclusion of later living bungalows to the south and some courtyard type development to the north of Jubilee Hall (to provide passive surveillance)
  - Provision of additional entrance from Glenveagh Plot A (Southern Character Area) to Old Connaught Avenue.
  - Removal of open space designation for Village Green (as they include private residences).
  - Residential use/zoning on the GB zoned lands in southwest corner of Glenveagh landholding.
  - The proposed associated amendments requested as set out in sections 2-5 inclusive and identified on Deady Gahan Architects Booklet page 11 (Appendix 5) and Figure 3.5 in the submission.



- Recommends the Council adopt a more realistic and pragmatic approach to the timing of provision of services recognising that a critical mass of population that will be required to be in place in advance of and to support various community and commercial services.
- Emphasises the purpose of the submission to ensure that the adopted LAP:
  - does not prejudice the natural and logical growth of the Old Connaught area,
  - capitalises on the significant investment in physical, social and community infrastructure in the wider area,
  - focuses on integrating land use and transport (including future bus route to the Bus Connects E spine on Bray Road) and
  - does not compromise the future development potential of lands which are capable of being serviced and suitable for residential development, in accordance with national, regional and local planning policy.
- Requests the consideration of proposed amendments set out within submission when finalising the Old Connaught Draft Local Area Plan 2025.
- Notes the potential for discussions regarding the submission or the lands to which it relates with the Council.

## INTRODUCTION

- Provides details regarding Glenveagh Homes including being a landowner of residential zoned land within the Old Connaught Draft Local Area Plan (LAP) boundary of some 27.8 hectares and the extent of lands which are being brought forward by Glenveagh for future development are identified on Figure 1.1 (c. 26.8 hectares).
- Outlines Glenveagh's purpose as an Irish homebuilder who delivers high-quality new homes with an emphasis on high-quality design, innovation, sustainability, and people friendly communities.
- Submission is of the opinion that Glenveagh is uniquely positioned to help address the chronic housing shortage due to their ability to deliver large quantities of new homes in an efficient manner, as per their track record.
- Welcomes the preparation of the Draft Old Connaught LAP ('Draft LAP') subject to the proposed amendments in this submission.
- Includes a map displaying the indicative location of Glenveagh landholding within Draft LAP boundary, as shown outlined in red, including a site at intersection at Dublin Road and Old Connaught Avenue.
- Provides reference points for Glenveagh lands which are split into 3 no. plots and details which are as follows:
  - Plot A: Located to the south of Old Connaught Avenue and east of Thornhill Road, sharing a contiguous boundary with Bray Emmets GAA Club and St. Gerards School, both to the south. The plot extends in a semi-horseshoe fashion thereby avoiding a number of properties situated about the south-east corner of the Ferndale Road-Thornhill Road junction.
  - Plot B: Located to the west of Thornhill Road and to the south of Ballyman Road, extending insofar south and west as the existing natural field boundaries opposing Thornhill Road and Ballyman Road containing Plots A and C respectively. It is noted that Plot B does not incorporate the existing 2 no. private residential dwellings situated at the corner junction of Thornhill Road and Ballyman Road to the north-east.
  - Plot C: Located to the north of Ballyman Road and west of Ferndale Road and shares a contiguous boundary with Old Conna Golf Club located to the north. In this way, the subject lands incorporate 'Jubilee Hall' a substantial period building with adjoining courtyard accommodation, which are acknowledged as protected structures (RPS Reg. Ref. 1879).

- Notes Glenveagh Homes has additional lands outside the Draft LAP at the junction of the Bray Road and Old Connaught Avenue, which could contribute towards improving the junction arrangement at that location.
- Proposes use of a vacant plot offering excellent access to Plot A (in addition to the Draft LAP access further to the east) to ensure the 5no. existing inhabited residences and habitable dwellings along Old Connaught Avenue are not inappropriately de-zoned for open space provision.
- Highlights that Glenveagh submitted a S. 247 pre-application consultation request in respect of a proposed LRD residential development of c. 900 dwellings as well as c. 4 hectares of open space and a community use for Jubilee Hall, on the subject lands on the 22nd February 2025, and intends to bring forward an LRD planning application for development on the subject lands which will contribute to the growth of the Old Connaught area consistent with the provisions of the Development Plan and Draft LAP, when adopted with regard to Objective A1 lands within Glenveagh's landholdings.
- Notes the commencement of site assessments and feasibility studies for land with substantial body of pre-planning work to inform the Draft LAP in terms of specifics of the site.
- Notes support and input from the following consultants:
  - Deady Gahan Architects;
  - Atkins Realis Consulting Engineers;
  - Ilsa Rutgers Landscape Architecture;
  - Systra;
  - John Cronin & Associates.
- Refers to layout by Deady Gahan Architects (Appendix 5) which takes into account some of the key elements of the Draft LAP and refined further following receipt of the arboriculture detail and topographical levels, which the Draft LAP did not have the benefit of considering when the Draft LAP was being prepared.
- Outlines updates made to the pre-planning layout for Glenveagh lands given information in Draft LAP and key constraints which are as follows:
  - To deliver the key principles and aspirations of the Draft LAP
  - To deliver key open spaces
  - To provide an integrated design
  - To propose a sympathetic layout to Jubilee Hall
  - To provide the necessary enabling infrastructure in an alternative strategy currently indicated in the Draft LAP.

#### **SUBMISSION REQUESTS - PHASING AND IMPLEMENTATION/MONITORING**

- Notes the purpose of the section which is to outline submission requests with respect to the foregoing site context and local planning policies contained in the Draft Old Connaught LAP ("Draft LAP") pertaining to the subject lands as well as a guidelines indicating that the proposed additional text is in green, and the text proposed to be deleted / amended is in red with a strikethrough.
- Outlines Draft LAP phasing strategy which is as follows:
  - Phase A: Lands to the north of Old Connaught Avenue
  - Phase B: Lands to the south of Old Connaught Avenue and west of Ferndale Avenue
  - Phase C: Lands to the north of Allies River Road.
- Notes the risk that exists on the Glenveagh lands as they are proposed to be delivered secondary to the development of the lands to the north of Old Connaught Avenue.
- Submission is of the opinion that infrastructure on the Glenveagh lands like the foul pumping station, surface water attenuation etc., can be facilitated, without recourse to other landholders.

- Emphasises that the provision of service infrastructure can be provided on the Glenveagh lands such as the looped water main, strategic pumping station, and ESB substation, which benefits the wider Draft LAP lands but not without associated housing provision in tandem.
- Submission is of the opinion that placing a cap on the quantum of potentially deliverable development is questionable despite the rationale for preparing a Draft LAP for the Old Connaught area, which is identified in the current core CDP strategy as contributing to the overall number of dwellings for the period 2022-2028.
- Notes the focus should be on how lands can be activated and delivered in a timely manner, in tandem with the necessary enabling infrastructure.
- Submits to inconsistency regarding commentary that the objective of Phase B is to progress the internal consolidation of Old Connaught as a sustainable urban village (as distinct to Phase A) for several reasons which are as follows:
  - The phasing table relating to Phase B currently requires a number of external wider area strategic elements of infrastructure to be delivered, (which have a wider function), whereas the focus should be on the delivery of a 10- minute walkable neighbourhood;
  - the proposed development of Phase A in advance of Phase B does not accord with the overarching principles of sequential development;
  - the development of our clients' lands to the south and west of Old Connaught Avenue can play an active role in promoting sustainable development without the need for expensive infrastructure, the delivery of which is outside the control of the landowners; and
  - that the neighbourhood centre/ village core is left to a later phase when it appears to be (and should be) the heart of the Draft LAP lands and the core tenet of a sustainable walkable community.
- References Draft LAP statement regarding reasoning designating the subject Glenveagh lands within Phase B, reads as follows:  
*"while distance to existing services and facilities varies across Phase B, it is considered appropriate, subject to the progression of sufficient infrastructure and services being provided within and serving the Draft Plan area, to progress the development of the overall Phase B area, based on the lands being of broadly equivalent merit for development purposes. This recommendation is reached assuming that sufficient area wide infrastructure is progressed as part of Phase A, additional area wide infrastructure is progressed to support the overall development of Phase B, and sufficient infrastructure is delivered to support development at the local level including facilities and services."*
- Highlights the objective of the development of Phase B according to the Draft Plan which is *"to progress the internal consolidation of Old Connaught as a sustainable urban village... and to a lesser degree on existing facilities and services external to the Draft Plan area."*
- Includes Figure 2.1 (Figure 11.1 in the Draft LAP) displaying the current phasing strategy of the Draft Old Connaught LAP.
- Submits that the configuration of Chapter 11 requires further consideration to ensure the co-ordinated and sequential/sustainable development of the Draft LAP lands.
- Notes that the lands within the Draft LAP are zoned A1 and as such appropriately located for the sustainable development of the area. Notes that Dun Laoghaire Rathdown County Council in the zoning of the lands has applied the sequential approach. All lands are zoned and therefore sequentially preferable because they are around the urban core and sequential to the key town of Bray.
- Requests that the development of the Draft LAP be linked to delivery of infrastructure not to specific areas and that the Draft LAP should not spatially sequence development where services can be provided.

- Submission is of the opinion that to hold back lands and associated 2,000 units forming part of the 2022-2028 Core Strategy figures as inconsistent with the County Development Plan and prejudice the ability to deliver core strategy housing targets, contrary to national and strategic planning policy.
- Submits that the logical spatial development of the LAP is to develop the lands located to the south of the Old Connaught Avenue in advance of the lands to the north of Old Connaught Avenue.
- Submission is of the opinion that the 'Phase B' lands should be at least equal in terms of delivery within the LAP with sequential preference for Glenveagh lands and their designation within the first phase of development being in accordance with phasing approach outlined in the LAP Guidelines 2013 which note that in respect of phasing that the LAP should *"identify first and foremost the lands expected to be developed over the plan period and the physical and social infrastructure required to be provided in tandem with that development."*
- Submission is of the opinion that the current phasing programme be amended to reflect the Development Plan Guidelines which state that:

*"phasing should be applied where there is a sound planning rationale for doing so, based on factors such as site location, the availability or proximity of, or capacity to provide, off-site services, facilities or infrastructure. **This should also be viewed in the context of the urgent need to increase housing supply,**"* and

*"Phasing **may not** be necessary where the planning judgement is that unconstrained zoned and serviced housing sites **are of broadly equivalent merit for development purposes** in a particular settlement or area at the plan-making stage. In all cases, whether phasing is applied or not, development plans **must build in sufficient flexibility** to ensure that housing development not progressing on one or more sites cannot operate to prevent other suitable sites that may be developed within the life of the development plan, from coming forward."* (JSA Emphasis added).

- Objects to absence of rationale regarding the sequential preference of the lands to the north of Old Connaught Avenue to the lands to the south.
- Submission is of the opinion that the sequential development should be from southeast to north to northwest to ensure development grows sequentially outwards from the following:
  - the existing services and facilities present within the southeastern quadrant of the Old Connaught LAP lands; Bray Emmets GAA club accessed off Old Connaught Avenue and St. Gerards Schools located on the eastern side of Thornhill Road,
  - the built-up area of Bray along Old Connaught Avenue which will form the primary transport link to the existing urban area,
  - Existing and under construction services. The southern lands at Old Connaught are best served by existing service and utilities networks including water services, ESB, Gas and other utility networks.
- Highlights that the spatial layout of the Draft LAP further 'copper fastens' the Glenveagh landholding as the sequentially preferable land bank within the LAP and indicates the reasons for this.
- Notes that development is undertaken in a logical sequence from the centre of the identified village core outwards, to allow for orderly and comprehensive development proposals.
- Acknowledges commencement of pre-planning consultations with DLR and intentions to progress an LRD for Glenveagh's entire landholding which will deliver the key elements above.

- Submits that the general approach to phasing of development at Old Connaught should be amended to include our clients' lands as Phase A and details the need for adopting a general sequential approach having regard to the existing pattern of development at Old Connaught and the wider Bray area and a need for logical and orderly blocks of development.
- Highlights that the Development Plan Guidelines 2022 state:  
*"It is a policy and objective of these Guidelines that zoned housing land in an existing development plan, that is serviced and can be developed for housing within the life of the new development plan under preparation, should not be subject to de-zoning."*
- Submission is of the opinion that the Draft LAP phasing of lands is not supported by the Development Plan Guidelines stating:  
*"Should it be the case that there is a surplus of well-located zoned and fully serviced land to meet population and housing supply targets already zoned for development in any local authority area when reviewing a development plan, it is recommended best practice that a phased approach be taken to prioritise the preferred sequence of development of such sites."*
- Notes that Development Plan Guidelines allows for phasing in some instances *"where there is a sound planning rationale for doing so"*, and further states: *This should also be viewed in the context of **the urgent need to increase housing supply**. Phasing may not be necessary where the planning judgement is that unconstrained zoned and serviced housing sites are of broadly equivalent merit for development purposes in a particular settlement or area at the plan-making stage.*

*In all cases, whether phasing is applied or not, **development plans must build in sufficient flexibility to ensure that housing development not progressing on one or more sites cannot operate to prevent other suitable sites that may be developed within the life of the development plan, from coming forward.*** (JSA emphasis added).

#### Request 1: PHASING SEQUENCE

- Summarises the submission request no.1 which focuses on the details in phasing sequence amendments and requests that at the very least the lands are equal in terms of phasing compared to the lands (Phase A) located to the north of Old Connaught Avenue and that Map 11.1 and Table 11.2 of the Draft LAP are amended to reflect same.
- Refers to Systra Transportation Consultants review of the ICAS and Draft LAP (Appendix 2) and summarises their key observations as follows:
  - The recommendations from the ICAS are contrary to the modal and intervention hierarchies - National Investment Framework for Transport in Ireland (NIFTI);
  - Package 3 that is recommended by the ICAS, appears to have the greatest impact on the local road network;
  - Beyond the delivery of Phase A (sub-phase 1), further development of the Draft LAP lands is dependent on provision of significant roads infrastructure; either the new road and bridge over the N11, or the N11/M11 Junction 4 to 14 Improvement Scheme;
  - There is an over reliance on delivering heavy enabling roads infrastructure at a very early stage of development. This is contrary to national policy which seeks to promote sustainable transport initiatives and optimisation of existing assets;
  - Whilst the ICAS report provides a list of potential funding mechanisms, no information is given on the potential costs of the schemes or how they are likely to be funded;

- Given the long lead in time for large infrastructure, the Draft LAP strategy risks delaying the delivery of much needed housing in Dun Laoghaire Rathdown;
  - The delivery of a large proportion of housing in Phase A of the Draft LAP is remote from the existing village centre and Old Connaught Avenue. This may result in the delivery of a fragmented and unbalanced development.
- Submission is of the opinion that no phasing exercise was undertaken to determine the quantum of development that could take place on the LAP lands before the junction reached capacity, and that no capacity enhancements were undertaken at the Dublin Road/Old Connaught Avenue junction to improve its capacity /safety for all modes based on modelling exercise undertaken as part of ICAS.
- Notes that lands under the ownership of Glenveagh Homes are available at this junction to enable the delivery of safety and capacity enhancements at the Old Connaught Avenue/Dublin Road junction.
- Notes that SYSTRA outlines previous statement in Bulletin no.12 (Dated 28th January 2022) of the N11/M11 Junction 4 to Junction 14 Improvement Scheme.
- Highlights that this scheme has been suspended due to insufficient funding set out under the National Development Plan (NDP).
- Acknowledges the central focus of this scheme is to deliver improved bus journey time reliability along this corridor as well as emerging preferred scheme for this interim project which does include enhancements to a number of the interchanges along this corridor, including the following at junction 6.
- Provides a list of enhancements to interchanges along N11/M11 Junction 4 to Junction 14 which are as follows:
  - Proposed new two-way parallel road between Junction 5 Bray North and Junction 6 (Bray Fassaroe) to cater for local trips and active travel
  - Proposed new roundabout on Old Connaught Avenue
  - Two lanes proposed to merge at Junction 5 Bray North (Northbound); and
  - Two lanes proposed to diverge and Junction 5 (Bray north) southbound.
- Includes illustration displaying proposed enhancements to the N11/M11 Junction 4 to Junction 14 Improvement Scheme.

#### Request 2: TRANSPORTATION - RECOMMENDATIONS TO PHASING

- Requests the following on the basis of the SYSTRA review:
  - Greater emphasis placed on developing a more practical phasing strategy for the early phases of the adopted LAP through the optimisation of existing infrastructure, in line with Government policy.
- Recommends optimisation of existing infrastructure, short-term upgrade on Old Connaught Avenue to improve active travel facilities and enhance the capacity/safety of the Old Connaught / Dublin Road junction as well as the re-examination of the phasing strategy towards a rebalancing of development, both north and south of the existing Village centre, thereby creating a sustainable community from the outset.
- Recommends the consideration of the following amendments based on the sustainable delivery principles outlined above:
  - Amend Phase A area to incorporate all lands contiguous to the existing village centre, situated to the north and south of Old Connaught Avenue and Ferndale Road.
  - Identify additional local network improvements, focused on active travel and bus enhancements, which can be implemented to enable a substantial increase in housing which can be delivered before the progression of a new road and bridge over the N11 to the Dublin Road,

- which should be a requirement when the number of units exceeds 2,000 within the wider Draft LAP area.
  - A greater emphasis should be placed on developing a more practical phasing strategy for the early phases of the Draft LAP through the optimisation of existing infrastructure.
  - Recommends that Old Connaught Avenue is upgraded in the short term to improve active travel facilities and enhance the capacity/safety of the Old Connaught / Dublin Road junction. Furthermore, it is recommended that the phasing strategy be re-examined towards rebalancing of development, both north, south and west of the existing Village centre, thereby creating a sustainable community from the outset
- Objects to the wording of any policy or objective dependent on unrelated sites or unnecessary infrastructure coming forward for development as it could result in some sites being delayed indefinitely resulting in the non-delivery of much needed housing for the key town of Bray.
- Emphasises that the principal aim of any Local Area Plan should be to provide a robust and sustainable framework, that all parties to the development process can work with, in the interest of delivering much needed housing in tandem with the required physical and social infrastructure for the future of the Key town of Bray.
- Cites concerns regarding the future LAP would result in lands which are phased to a degree to end in an effective de-zoning of significant areas of residential lands as a result of choosing unviable and unfunded significant infrastructure, which is not required to deliver Phase A and Phase B lands within the LAP.
- Requests the removal of differentiation between Phase A and B as well as dependency on significant infrastructure that is not required to serve those lands.
- Acknowledges that the Old Connaught Draft LAP area does not exist in isolation and that the strategic M11/N11 corridor is located adjacent to the east, which must be taken into account and assessed.
- Highlights need to protect the strategic function of the national road network, careful management of the finite capacity that exists on the strategic road network and on the provision of external strategic transport infrastructure and services such as the new road and bridge over the N11, or the N11/M11 Junction 4 to 14 Improvement Scheme.
- Recommends that a monitoring programme is put in place to act as an appropriate 'back stop' to ensure that the Draft LAP lands can be developed in an appropriate fashion.

#### Request 3: TRANSPORTATION - MONITORING PROGRAMME

- Suggests wording for inclusion in Section 12.3 of the adopted LAP is as follows:

*"The results of this monitoring may impact on the phasing requirements beyond the thresholds established for development exceeding 2,000 units, pending the delivery of the required transportation services and infrastructure. This may result in an application being considered premature on the basis of a lack of capacity in the strategic road infrastructure."*

*"For proposals which exceed the 2,000 threshold in the LAP area, developers would be required to assess and demonstrate that the predicted impacts of any proposed development on the strategic road network prior to any further planning application being submitted. The extent of the area to be assessed and associated methodology applied is to be agreed between the developer, Dun Laoghaire Rathdown County Council, in consultation with the NTA and TII."*



- Notes a similar approach was adopted in the revisions to the Cherrywood Planning Scheme 2014, which has allowed the development of the SDZ.
- Recognises that Figure 6.12 of the Draft LAP demonstrates the indicative Active Travel Network for the plan area.
- Offers a summary of proposed vehicular transport network for Old Connaught is indicated on Figure 6.14 which shows the proposed new road linkages through the Glenveagh lands between Old Connaught Avenue, Thornhill Road, Ballyman Road and Ferndale Road. Road upgrades are also proposed to Thornhill Road and Ballyman Road where the Glenveagh lands intersect with these roads. A Bus Gate operation system is proposed to be used between the proposed neighbourhood centre and N11/M11 junction of Old Connaught Avenue.
- Includes extract of proposed vehicular network for Old Connaught in Figure 2.2 of the submission.
- Highlights that the primary objective is to create a traffic calmed village core at Old Connaught through the provision of peripheral link routes around the centre, thereby through Glenveagh lands as mentioned.
- States that, per the Draft LAP, *"it is the intention for the new link roads to be low speed streets with active travel infrastructure and active frontage from surrounding development, as opposed to car dominant 'outer orbital' style roads"*.

#### Request 4: TRANSPORTATION – INTERNAL ROAD LAYOUT OF LAP

- Includes a summary of request 4, recommendations to Draft LAP – Internal Layout, which is as follows:
  - Realignment of vehicular link between Thornhill Road to Old Connaught Avenue (broadly adjacent to the route of the Luas reservation);
  - Provision of a more direct vehicular link between Thornhill Road and Ballyman Road.
  - Provision of a vehicular link between Ballyman Road and Ferndale Road.
  - In addition, provision of an additional urban greenway/vehicular access to southern character area from the link between Thornhill Road and Old Connaught Avenue.
- Notes the proposal to develop an urban greenway/access point to Plot A via an existing vacant plot between the existing 5 no. residential units.
- Submits the inclusion of an access point further to the east in Draft LAP which will be delivered.
- Submission is of the opinion that the future entrance adjacent to the Luas reservation and future Luas is less attractive for an entrance to the southern residential lands compared to the additional entrance included in the concept design given the road connecting Old Connaught Avenue and Thornhill Road has more of distributor Road function, and less sympathetic to a discrete residential access.
- Includes a proposed concept movement strategy based on previously outlined consideration which is Figure 2.3 in the submission.
- Notes that the transportation phasing provisions of the Draft LAP will have significant impacts on the delivery of residential development, on their clients' lands unless the phasing strategy of the Draft LAP is altered.
- Questions the commentary in the Draft LAP that the proposed new bridge over the N11 to the Dublin Road or the N11/M11 Junction 4 to Junction 14 Improvement Scheme is required for the development of the current A1 zoned lands within the Draft LAP area.
- Submits that this requirement may be needed for the future development of greater than 2,000 units and the adjoining future Rathmichael LAP, located

further to the north but may not be required for the majority of Old Connaught Draft LAP, which can provide a sustainable development underpinned by a bus-based solution to link into the Bus Connects E-Spine, located to the east on the Dublin Road.

- Refers to the Systra Technical Note included with this submission in Appendix 2.
- Acknowledges that early investment in the required enabling infrastructure is critical to the delivery of a sustainable community.
- Submission is of the opinion that the ICAS is heavily reliant upon the delivery of substantial costly roads infrastructure, particularly over the N11, based on a very small level of development and provides no meaningful assessment as to why this level of infrastructure is required at such an early stage in the development as well as early heavy reliance on roads infrastructure is contrary to NIFTI and NTA policy which seeks to prioritise sustainable transport first and optimise use of existing assets.
- Notes that the Draft LAP outlines that post-Phase A1 will not be permitted until the N11/M11 and or a bridge across the M11 is delivered.
- Highlights significant impacts on the delivery of residential development on the Glenveagh lands at Old Connaught.
- Emphasises the connectivity of Old Connaught to existing road and transport networks as well as key town of Bray, in the area most notably via Old Connaught Avenue which provides direct access to the Dublin Road and the northern part of the Key town of Bray and this existing connectivity would facilitate the immediate sequential development in Old Connaught in terms of:
  - Current connectivity to the remainder of Bray a key town, facilitating the Old Connaught area to immediately develop as a logical urban extension of this existing substantive urban settlement.
  - Direct access to existing high frequency and enhanced bus services as part of recently approved Bus Connects upgrade on Dublin Road in north Bray serving Dublin City Centre. The core corridor improvements will in the future include improvements to cycle provision along Dublin Road to Bray Main Street. It is noted that the roll out of increased and enhanced services along the E Spine has been in place for the past c. 2 months.
  - Connections to the existing (recently upgraded) Bray DART station transportation interchange and to the new (under construction) Woodbrook DART station.
- Notes that in the transport strategy of the Draft LAP that the N11/M11 Capacity Enhancement scheme is a key transport infrastructure project for the development of Old Connaught.
- Acknowledges that the preferred route option was published in 2021 which would allow for direct access between Old Connaught and the N11 and Dublin Road.
- Notes in Draft Plan that the N11/M11 Bus Priority Interim Scheme (BPIS) offers a practicable alternative solution for implementation in advance of the motorway capacity enhancement scheme.
- Notes that a number of transport packages were reviewed as part of the assessment. Package 3 is reliant on the delivery of a costly new road over the N11 at Junction 5 with a new connection onto the Dublin Road.
- Submission is of the opinion that this proposal is contrary to the principles established in NIFTI which seeks to optimise use of existing infrastructure before introducing new roads and that the provision of this new road will substantially increase the capacity of the transport network for vehicular traffic thereby inducing additional car traffic which means it is not aligned with the principles of Road Development as established in the NTA's Greater Dublin Area Transport Strategy 2022-2042.

- Objects to the identification of Package 3 as the emerging preferred option for development at Old Connaught in the ICAS report, but it is not clear from the summary assessment as to why this is the preferred chosen package.
- Notes that the transport infrastructure projects noted in the Draft LAP were identified in the BETS as potentially necessary for the full build out of lands at Old Connaught and that it did not suggest they were a pre-requisite for any development at Old Connaught.
- Submits that initial phases of development at Old Connaught developing sequentially from Old Connaught Avenue to the east, and which will access Bray via Old Connaught Avenue, are not reliant on any of the local roads projects identified in BETS which provide access for lands on the northern side of Old Connaught (Phase C) and further to the north as part of the separate Rathmichael LAP area.
- Submission is of the opinion that the requirement to deliver the entirety of Phase A before Phase B can commence, will also delay the consolidation of development at the Old Village, which is a stated key objective of the LAP.
- Highlights a recommendation in ICAS report regarding an equitable provision of infrastructure delivery funded by landowners/developers – through planning contributions, and state agencies– through national funding initiatives.
- Emphasises an absence of information regarding the potential costs of the schemes or how they are likely to be funded.
- Submission is of the opinion that over reliance on delivering heavy enabling roads infrastructure at a very early stage of development is contrary to national policy given the long lead in time for large infrastructure, it also risks delaying the delivery of much needed housing in South Dublin as well as the delivery of a large proportion of housing in Phase A which is remote from the existing village centre and Old Connaught Avenue may result in the delivery of a fragmented and unbalanced development.
- Objects to the absence of the point that Package 3 is reliant on the delivery of a costly new road over the N11 at Junction 5 with a new connection onto the Dublin Road within the Multi Criteria Analysis (MCA) process given that the proposal is contrary to principles established in NIFTI which seeks to optimise use of existing infrastructure before introducing new roads.
- Notes that the provision of this new road will substantially increase the capacity of the transport network for vehicular traffic thereby inducing additional car traffic and is of the opinion that the road is also not aligned with the principles of Road Development as established in the NTA's Greater Dublin Area Transport Strategy 2022-2042.

#### Request 5: RECOMMENDATIONS TO DRAFT LAP – INTERNAL LAYOUT

- Submission is of the opinion that withstanding substantial alteration to the Phasing Strategy of the Draft Plan, there will be significant impacts and delays on residential development due to the Glenveagh lands designation to Phase B.
- Recommends consideration is given to the proposed amendments to the phasing table outlined in Section 2.4 of the submission (Draft LAP Table 11.2).
- Supports the timely delivery of infrastructure to underpin and support the development of the lands at Old Connaught as well as collaboration with relevant agencies such as Dun Laoghaire Rathdown County Council, Uisce Eireann, TII, and the NTA to ensure that the Old Connaught area will have the required infrastructure.
- Submission is of the opinion that there should be an acknowledgement of potential exceptional or unforeseen circumstances beyond the reasonable control of an individual developer or the local authority, whereby a piece of infrastructure necessary to progress the development currently identified in the Draft LAP, cannot be provided in the short to medium term (c.0-3 yrs).

- Submits that there may be appropriate alternative/interim measures utilising other infrastructure to facilitate the early delivery of housing, and engagement with the Planning Authority is an important factor.
- Refers to technical note prepared by AtkinsRealis in Appendix 3 that provides commentary on the Draft LAP in respect of utilities and outlines practical interim measures which, in conjunction and agreement with Uisce Éireann and DLR, could deliver more dwellings than currently indicated, prior to wider upgrades.
- Submission is of the opinion that a too rigid application of Phase A/Phase B designations will lead to the consequence of serviced lands not being brought forward for development due to unforeseen circumstances on other unrelated sites.
- Requests greater flexibility in the application of Phase A/Phase B designated lands so that there are no conflicts with the over-arching core strategy.
- Highlights that the phasing strategy does not 'bake in' undue restrictions in bringing land which can be serviced for development which could rule out significant areas from development and lead to the non-delivery of much needed housing for the Key Town of Bray, located within the MASP as set out in the RSES with excellent accessibility to modes of public transport.
- Refers to note in Draft LAP that states that Uisce Éireann *"completed works on the Old Connaught/ Woodbrook Water Supply Scheme which comprised the upgrade of the drinking water supply for parts of South Dublin and North Wicklow. The Scheme involved the provision of two new high-level reservoirs at Ballyman and the installation of approximately 14km of new water mains to distribute water to local areas. The Scheme provides network resilience, flexibility and capacity for future growth,"*
- Highlights that the provision of water supply is not an issue for the future development of lands within the Old Connaught Draft LAP area and that the distribution of this water supply in accordance with the ICAS report is via a looped watermain across the Glenveagh Southern Character Lands and would require the infrastructure to be size for the densities on the Central Character Lands located to the North and thus increasing the size of the infrastructure to be installed.
- Commends the provision strategic mains supply for the masterplan lands in accordance with the ICAS report is positive in terms of rolling out development within the Draft LAP and indicates the appropriateness of moving the Glenveagh lands out of Phase B and into Phase A so that this infrastructure can be delivered in a coordinated fashion with essential housing delivery.
- Refers to wastewater acknowledgement in the Draft LAP which states that *"the Old Connaught area is not currently serviced with strategic wastewater infrastructure and, at present, existing residents own and maintain their own septic tanks. The Draft Plan area is not serviced by an Uisce Éireann wastewater network and there is currently no connection eastwards across the M11 to the existing wastewater network."*
- Notes Uisce Éireann are finalising the Bray/Shanganagh Drainage Area Plan in order to address the wastewater needs of the area.
- Notes the current indicative location for the delivery of a wastewater pumping station to serve the area is to the north of Old Connaught Avenue.
- Highlights the Atkins note in Appendix 3 outlining the strategic pump station (PS) is delivered up front instead of the use a temporary PS, this will reduce overall expenditure and ensure that there is no temporary infrastructure required.
- Notes the Draft LAP indicates the proposed PS within DLRCC Lands, it states that *"the location identified is indicative only and the ultimate final location of the pump station is subject to further assessment and agreement with Uisce Éireann"* which is to be welcomed, the ICAS report also indicates that a pump station could be located in the Phase B lands again which is to be welcomed.

- Notes a submission regarding a pre connection enquiry to Uisce Éireann for 2,200 units within the residential zoned lands and received a Confirmation of Feasibility (CDS24006358) which noted that further analysis is required regarding a strategic location for the proposed strategic wastewater pump station.
- Notes Uisce Éireann indication to the applicant that a masterplan review of the residential zoned lands identified in the DLRCC County Development Plan and Draft Old Connaught LAP to identify a suitable location for the strategic wastewater pump station would enable Uisce Éireann to progress this analysis.
- Notes that the initial analysis is that a suitable location for the strategic WwPS is feasible within the Glenveagh lands to serve all of the residential zoned lands as well as that the Atkins technical note included with this submission (appendix 3) outlines that the ICAS has:  
*"indicated temporary PS can be used in advance of the permanent strategic PS that will allow for the full LAP build out of 2400 units, however, there is no reason why the permanent strategic PS is not advanced as early as possible to prevent capital expenditure of both temporary and permanent PS, this will be a commercial decision based on Glenveagh Homes Ltd requirements. The strategic PS is identified on strategic reserve TII / DLRCC lands and would be deemed not suitable for this location, however 2 other pump station locations are identified on DLRCC lands (sub-phase 1 lands) and Glenveagh Homes Ltd Lands (phase B lands) which is welcomed. As all pumping stations are indicated at similar existing ground levels of 21mOD - 20mOD. The option to provide the temporary PS and / or permanent strategic PS within Glenveagh Homes Ltd lands is possible to deliver to the benefit of the wider LAP lands."*
- Submits that it could be possible to locate the permanent strategic pumping station to be delivered up front instead of the temporary PS, this will reduce overall expenditure and ensure that there is no temporary infrastructure required.
- Submits that design interventions to the pumping station could facilitate the development of the lands which should be examined in consultation with Uisce Éireann:
  - to allow for the increased size of wet well and emergency storage to remove the need for a rising main under the M11 and for the existing ducting within the bridge as the permanent solution.
- Highlights the allowance for a full build out of Glenveagh Homes Ltd Lands (Phase B) without the need for other areas to be developed.
- Notes the commissioning of DOBA Consulting Engineers to review the potential location of a strategic pump in Appendix 4 which includes an Uisce Éireann COF, which was compiled using information gathered from publicly available information including the Draft Old Connaught LAP, Uisce Éireann (UE), Ordnance Survey Ireland (OSI) and Geological Survey Ireland (GSI) as well as a site visit to walk the subject lands.
- Highlights existing topography of the residential zoned lands fall from west to east towards the M11, from +75.00m OD Malin along the western portion to c. +19.00m OD Malin at the eastern boundary adjacent to the M11.
- Submission is of the opinion that the appropriate location for a strategic wastewater pumping station is in the lower portion of the lands to the east.
- Includes a map outlining potential locations for Strategic WwPs which is Figure 2.4 in this submission.
- Notes DOBA produced drawing (**C-0300**) in appendix 4 which identifies a suitable location for the strategic WwPS in the Glenveagh lands and includes a suggested route for a future wastewater gravity pipe serving the proposed residential development on the 3rd party lands to the north of Old Connaught Avenue discharging to the proposed WwPS.

- Submission is of the opinion that a strategic WwPS can be located in the Glenveagh lands to serve the full extents of the residential zoned lands in the Draft Old Connaught LAP on the basis of drawing **C-0300**.
- Includes an extract from DOBA drawing C-0300 comparing the location of the WwPS in the Draft LAP document and the proposed location in the Glenveagh lands and associated ground levels which is Figure 2.5 in the submission.
- Notes that foul sewerage from the prescribed area will drain to the Shanganagh Wastewater Treatment Works which has surplus capacity to cater for the foul drainage requirements of the Draft LAP area.
- Submission is of the opinion that the provision of a strategic pump station and rising main crossing the motorway falls within the responsibilities of Uisce Éireann and is one which should be planned and provided by UÉ in the short term to facilitate timely delivery of residential development at Old Connaught.
- Submission is of the opinion that the Draft LAP should make an alternative interim measure whereby the provision of a pump station and rising main across the motorway could be developer-led, under agreements similar to the recently proposed First Mover Disadvantage (FMD) and Self Lay Agreement mechanisms, but with costs to be repaid by UÉ and / or the local authority to such a developer in order to ensure delivery of residential development at Old Connaught is not further delayed in the event that UÉ does not progress the installation of the pump station in a timely manner.
- Highlights that the provision of the strategic PS on Glenveagh lands, amended to be included within Phase A, provides certainty of delivery and facilitates the achievement of Core Strategy housing targets in the short term.
- References Draft LAP note about new development that has the potential to significantly increase the amount of same and associated flood risk as a result in terms of surface water runoff.
- Notes preferred approach to develop a new gravity stormwater network to facilitate new development, with 2 no. attenuation ponds on the basis of the Infrastructure Capacity Assessment.
- Notes that the Glenveagh lands can accommodate a southern attenuation pond which could facilitate the development of the lands, without the need to provide the regional attenuation pond located to the north.
- Notes that the Strategic Flood Risk Assessment of the Draft LAP indicates substantially less flood risk than indicated under the CDP Strategic Flood Risk Assessment and the potential flood risk demonstrated by the Draft LAP does not impede upon Glenveagh lands, particularly the northern portions of Plot A along Old Connaught Avenue, as previously shown by the CDP SFRA.
- Includes a Draft LAP map extract displaying predicted flood extents within the LAP area which is Figure 2.6 in the submission.
- Notes that there are no issues envisaged by the Draft Plan or the Infrastructure Capacity Assessment in respect of energy, ICT communications and/or waste management.

#### Request 6: AMENDMENTS TO PHASING TABLE 11.2

- Emphasises that the Draft LAP states that the development of the lands is dependent on the delivery of "*the incremental provision of enabling infrastructure set out in Table 11.2*" including the Phase A infrastructure of the M11/N11 upgrade works, wastewater pumping station, primary attenuation pond, and other infrastructure to be delivered in tandem with the Phase B residential development such as the peripheral link roads, looped watermain, existing road upgrades, strategic parks and open spaces, active travel infrastructure, electricity upgrades, secondary attenuation pond and neighbourhood centre and civic plaza.
- Submission is of the opinion that prior to the delivery of physical and social infrastructure, the some 1,300 – 1,400 no. units cannot be constructed.

- Refers to Deady Gahan Architects layout in appendix 5 which takes into account some of the key elements of the Draft LAP which has been refined further following receipt of the arboriculture detail and topography, which the Draft LAP did not have the benefit of when the Draft LAP was being prepared.
- Includes three-page (pages 30 – 32 of submission) table providing a detailed outline of proposed amendments to the Phasing Table 11.2 within the Draft Plan that contains the following headers to cover relevant information: Infrastructure; Requirement and Commentary.

Request 7: Amendment to Policy OCLAP66

- Highlights support of including the following policy OCLPAP 66 – Phasing Strategy with a minor addition in bold:

It is the policy that:

*Future development, as appropriate, shall accord with the Phasing Strategy for the Draft Plan **or as otherwise agreed with the Local Authority** (bolded in green). Planning applications shall include a 'Consistency Statement' setting out how the objectives of the Phasing Strategy, as relevant and applicable to the proposal for development, will be achieved.*

*Deviations for the phasing strategy may be considered on a case-by-case basis, and agreed to the satisfaction of the Planning Authority, to allow for unforeseen circumstances beyond the reasonable control of an individual developer or the Local Authority. Deviations may comprise viable alternatives or interim measures that accord with the overall objectives of the Draft Plan. Any interim proposals must ensure and maintain consistency with the buildout or 'long term' infrastructure objectives of the Draft Plan.*

- Acknowledges that the delivery of residential development within the overall settlement is predicated on the delivery of necessary enabling infrastructure including wastewater and transportation, including road upgrades and public transport.
- Notes in Section 11.3.5 of the Draft LAP that the phasing of public bus services to serve Old Connaught are to be delivered in the short to medium term to underpin the delivery of housing which is subject to ongoing engagement with the National Transport Authority.

#### **SUBMISSION REQUESTS - SPATIAL STRATEGY / SITE DEVELOPMENT FRAMEWORKS / LAYOUT**

- Recognises that the delivery of public bus services to the area may act as an interim and acceptable measure, alternative to local road upgrades, to underpin additional residential development delivery.
- Outlines the over-arching constraints relating to the subject lands which are set out in the DGA Booklet included with the submission which is a critical consideration in respect of the envisaged layouts for the future development of the lands within the Draft LAP.
- Includes map displaying Uisce Éireann wayleave and constraints within part of Southern and entire Western Character areas (Glenveagh Plots B and C) which is Figure 3.1 in this submission.
- Submission is of the opinion that the establishment of link streets through the 3 no. Glenveagh plots is reasonable and appropriate approach to the development of a traffic-calmed village setting by redirecting traffic around the settlement in a ring-road like fashion.
- Offers happily to bring forward and deliver same as part of any future development scheme which is shown in the DGA Draft Masterplan Layout for the subject lands.



- Submission is of the opinion that the provision of the main road through 'Plot A' adjacent to the LUAS reservation is a reasonable design for the layout of this area which will help to complement the creation of pedestrian-priority neighbourhoods within the lands to the immediate north of this location.
- Welcomes the provisions made within the Draft LAP for the upgrading works to Thornhill Road and Ballyman Road adjacent to the subject lands to improve their capacity and efficiency for future development in the area.
- Welcomes the indicative measures outlined on the Site Development Frameworks with regard to the provision of public bus services as it is considered that the same will help to prioritise a bus-based system for Old Connaught to therefore 'unlock' the development potential of the surrounding lands for residential development and additional commentary in relation to this will be provided in succeeding sections of this submission.
- Notes that the following of this submission briefly outlines the key policies and objectives of the Draft LAP as it relates to the Spatial strategy of the Old Connaught Area.
- Notes that the overall strategy of the Draft LAP incorporates a significant area of land to the west of the built-up area of Old Connaught.
- Includes a map of the full extent of the Draft LAP lands displaying an overarching masterplan of the Draft LAP showing the indication location of Glenveagh lands outlined in black which is Figure 3.2 in this submission.
- Welcomes the preparation of a concept Site Development Framework and masterplan for their lands and the wider Draft LAP area.
- Submission is of the opinion that the same will help steer and support the sustainable development and proper planning of the area, through its appropriate guidance.
- Notes that there is c. 50 ha of undeveloped land zoned for 'A1 – New Residential' uses within Old Connaught.
- Includes Figure 3.3 which is an extract of Figure 4.2 of the Draft LAP, in relation to Glenveagh lands with indicative location outlined in blue which displays a spatial distribution of land-uses across the LAP area and objective SDF1 of the Draft LAP as well as noted in this regard as follows:

*"It is an objective that future development shall accord with the land uses identified in Figure 4.2, and any additional more detailed provisions set out in the Site Development Frameworks (see Section 4.4)."*

- Includes Figure 3.4 which displays an extract of indicative Character Areas for the developmental areas of the Draft LAP area while also outlining (in orange) Glenveagh's indicative response about how a viable scheme could be progressed across the landholding located in the southern and western character areas.

#### Request 8: KEY STRUCTURING PRINCIPLES

- Notes that Figures 3.5 and 3.6 show the Design Team's response to the Draft LAP and requests that the following is taken into account and included in the final Draft LAP.
- Includes Figure 3.5 which outlines proposed rearranged land uses, key structuring principles and density including changes to existing residential, proposed residential with density of 60-80 uph, proposed strategic park / open spaces, proposed residential with density of 40-50 uph, proposed residential with density of 35-50 uph, proposed neighbourhood centre, local regeneration site, proposed Luas corridor, proposed new link streets, existing roads and proposed Bus Gate area.
- Includes Figure 3.6 which provides a detailed map with a concept layout in response to Draft LAP including access points, residential developments, active

- travel routes, public transport routes, infrastructure works, heritage structures, open and recreation spaces, and retail/retail services.
- Notes that Plot A predominantly forms the 'Southern Character Area'.
  - Highlights the vision for this Character Area which is *"to provide for a new residential neighbourhood, one which will develop its own unique character and sense of place, with quality public realm and building design, and which will successfully integrate with the existing residential community."*
  - Includes Figure 3.7 which is an extract of Figure 4.17 in the Draft LAP that is highlighting the site development framework for the Southern Character Area, with indicative location of Glenveagh future LAP lands outlined in yellow on the map.
  - Notes from Figure 3.7. that:
    - The indicative LUAS corridor remains along the southern boundary of the plot, with a significant road running its length between the line and the indicative residential blocks.
    - A substantial Urban Greenway bisects the site from the entrance of this roadway off Old Connaught Avenue through the central aspects of the plot area through indicative public open spaces to Thornhill Road, which is in addition to the already substantial green space rezoning.
    - A number of Active Travel and Permeability Routes permeate the site through the indicative residential areas and cross the LUAS reservation at 3 no. points to St. Gerards School and Bray Emmets lands to the south.
    - An indicative attenuation pond is located within an open space area at the northern boundary of the plot, to the west of the road, with a 'Strategic Infrastructure' area located to the east opposite. It is recognised that an 'Indicative Bus Route' runs along the Thornhill Road and onto Old Connaught Avenue.

#### Request 9: WESTERN CHARACTER AREA

- Notes that Glenveagh Homes Plot B is designated as part of the 'Western Character Area' in its entirety, while Plot C predominantly falls under same.
- Includes Figure 3.8 which is an extract of Figure 4.23 in the Draft LAP which highlights the site development framework for the Western Character Area with an indicative location of Glenveagh lands outlined in blue.
- Requests that the Site Development Framework (figure 4.23-figure 4.26) as it relates to the Glenveagh Homes Ltd., lands for the Western Character Area is amended to reflect the reality on the ground to Figure 3.9 having regard to the significant Uisce Eireann Wayleave.
- Includes Figure 3.9 which details submission request no. 9 Spatial Strategy – Western Character Area which takes into account the Uisce Eireann wayleave (outlined in yellow on the map) and has consequential amendments to the road layout but incorporates the 2 no. vehicular links envisaged by the Draft LAP connecting Thornhill Road to Ballyman Road and from Ballyman Road to Ferndale Road.

#### Request 10: DENSITY

- Submission is of the opinion that the interpretation of the classification made by the Planning Authority in respect of the location of the subject lands (i.e., *Centre and Urban Neighbourhoods*), *having regard to criteria (ii) – "strategic and sustainable development locations" and criteria (iii) – "lands around existing or planned high capacity public transport nodes or interchanges"* does not take into account the full provisions of the Compact Settlement Guidelines 2024 for the following reasons:
  - The subject lands are not *"strategic and sustainable development locations"* as defined in section 4.4.4 of the Development Plans Guidelines for Planning Authorities 2022), which are "long term" in

- nature i.e., to be delivered *"over a timescale greater than a single six-year development plan period."* (page 49) and the lands and c. 2,000 units at Old Connaught are identified and included within the Core Strategy for the current dlr County Development Plan 2022-2028 as well as that the only strategic reserve lands in the area relate to the Phase 3 lands to the north of Old Connaught Avenue which is confirmed in Policy Objectives CS4 and CS5 – Strategic Land Reserve.
- The subject lands are located within a 1km catchment of the Luas route indicated on the DLR CDP Map (even excluding the branch to Fassaroe which bounds the southern portion of the Plot A) and while planned public transport in the form of a Luas extension (currently post 2031) is identified in strategic planning policy, the Dublin Transport Strategy, the National Transport Authority, Transport Infrastructure Ireland or Irish Rail have not currently published the preferred route option and stop locations for the planned public transport (the second qualifying criteria), so it is considered that the lands are currently not classified as *"lands around existing or planned high capacity public transport nodes or interchanges"*.
  - The lands in the western character area (adjacent to Jubilee Hall) include an "INST" objective on the DLR County Development Plan where section 4 of the CDP states for INST lands that *"Average net densities should be in the region of 35 - 50 units p/ha. In certain instances, higher densities may be permitted where it can be demonstrated that they can contribute towards the objective of retaining the open character and/or recreational amenities of the lands"* as well as being located on topography, which is steep, which requires a specific design solution (as set out in the Deady Gahan Architects booklet), so to ensure that the density proposed in that area is appropriate to its context, Glenveagh is seeking a marginally lower density to reflect the ability of the provisions of the Compact Settlement Guidelines to be harnessed to deliver more compact own door units.
- Submission is of the opinion that the appropriate density ranges for the subject lands are lower than envisaged and currently set out despite Draft LAP commentary.
  - Refers to Section 3.3 of the CSG, which states that *"the density ranges set out in Section 3.3 should be considered and refined, generally within the ranges set out, based on consideration of centrality and accessibility to services and public transport; and considerations of character, amenity and the natural environment."*
  - Notes that the Guidelines also state that: *"Historic environments (built and landscape heritage) can be particularly sensitive to change. It is a recommendation of these Guidelines that a Built Heritage Character Assessment inform the preparation of statutory development plans that relate to historic environments."*
  - Notes that Old Conna has a distinctive character with a number of historic structures clustered around a 'green' at the junction of these roads as well as a number of more recent detached houses on individual sites.
  - Submission is of the opinion that a high-density apartment development would not be appropriate given sensitivities from an architectural heritage perspective within in the area despite the long-term potential for the delivery of a Luas line.
  - Offers the potential for discrete areas of apartment development delivery in the southern part of the Glenveagh landholding.
  - Notes that policy PHP18 of the Development Plan policy seeks to maximise the use of zoned and serviced residential land, stating that the objective is to increase the supply of houses and apartments and promote compact urban

growth through the consolidation and reintensification of infill/brownfield sites and to encourage higher residential densities and that the minimum default density for new residential developments in the County is 35 units per hectare (net density.)

- Notes that the minor deviations from the residential density standards may be considered by the Planning Authority on a case-by-case basis to allow for a range of potential design solutions, according to the plan.
- Refers to Section 3 of the Compact Settlement Guidelines 2024 which details methodology for identifying appropriate densities in a range of settlements as defined in Table 3.8 including a note stating that the asterisk on the table refers to *'open for consideration at 'accessible' suburban / urban extension locations.'*
- Provides a definition for Bray based on the RSES as well as a reference to Section 3.3.3 Key Towns and Large Towns in the Compact Settlement Guidelines which includes density ranges for key towns (in table 3.5) and according to the Compact Settlement Guidelines, *"density ranges for all towns and villages in the metropolitan areas of the five cities and outside of the city and suburbs area (including designated Key Towns in the metropolitan area) are set out in Table 3.3."*
- States that the Compact Settlement Guidelines (with regard to lands classified as suburban/urban extension):  
*'Suburban areas are the low-density car-orientated residential areas constructed at the edge of the town, while urban extension refers to greenfield lands at the edge of the existing built up footprint that are zoned for residential or mixed-use (including residential) development. It is a policy and objective of these Guidelines that residential densities in the range **35 dph to 50 dph (net) shall generally be applied at suburban and edge locations of Metropolitan Towns, and that densities of up to 100 dph (net) shall be open for consideration at 'accessible' suburban / urban extension locations** (as defined in Table 3.8).'* (submission emphasis added)
- Notes that DGA in consultation with John Cronin Associates and the wider design team have undertaken a design evaluation of the densities proposed by Compact Statement Guidelines based on on a review of the Draft LAP, site characteristics, heritage and environmental factors which are as follows:
  - Glenveagh Plot A - Lands adjoining the Luas Reservation 60-80 dph.
  - Glenveagh Plot B - Lands to the south of Ballyman Road – Proposed 40-50 dph in place of the 60dph indicated in the Draft LAP.
  - Glenveagh Plot C - Lands adjoining Jubilee Hall – Proposed 35-50 dph in place of the 60dph indicated in the Draft LAP.

#### Request 11: RESIDENTIAL MIX

- Notes that Section 12.3.3 the Development Plan sets out quantitative standards for all residential development. Table 12.1 sets out the mix requirements for apartment developments and for schemes in New Residential Community areas as defined in Development Plan Figure 2.9 Core Strategy Map, the requirements for apartment developments are as follows:
  - Maximum 60% studio, one and two bed units;
  - Maximum 30% of the overall development as a combination of one bed and studio;
  - Maximum 20% of the overall development as studios;
  - Minimum 40% 3+ bedroom units.
- Notes that the lands at Old Connaught are identified as a new residential area (as per figure 2.9 of the CDP).
- References CDP note that the apartment element, if in excess of 50 units, shall also comply with the requirements of Table 12.1 of the Development Plan as summarised in the extract at the top of page 46 in this submission.

- Notes the following in relation to residential schemes of 50+ units where a mixture of houses and apartments are proposed:  
*"In schemes of 50+ units, where a mixture of housing and apartments or a scheme comprising solely of houses is being provided on a site the housing offering must ensure a mixture that includes a proportion of housing units that are 3 beds or less. In new residential community areas, it is appropriate that schemes generally include houses in addition to apartment/duplexes."*
- Refers to Policy OCLAP19 – Residential Mix in the Draft LAP which states:  
*It is Policy that all new residential developments within the Draft Plan area shall accord with the mix requirements set out in Policy Objective PHP27: Housing Mix and Section 12.3.3.1 of the dlr County Development Plan 2022-2028. In this regard, all planning applications for residential development within the Draft Plan area shall provide for a suitable mix of house types and sizes that meet the needs of a range of households and should incorporate flexible housing units that can be adapted to suit changing household needs.*
- Submits that Glenveagh Homes provide a sustainable mix of residential units, including a range of house types, duplex apartments, and apartments.
- Highlights objective to provide as many own door dwellings as possible which is in accordance with the aims of the Compact Settlement Guidelines 2024, which seek to *"support the delivery of compact 'own door' housing and a greater range of affordable housing options."*
- Notes typical Glenveagh provisions includes a significant quantum of 2-bedroom houses suitable for young families.
- Submission is of the opinion that this typology is more affordable and suitable for families, preferential to what the market can afford, and can be quickly delivered, in stark contrast to 3-bedroom apartments (in apartment buildings) which are slower to deliver and less suitable for families.
- Refers to Compact Settlement Guidelines which note that:  
*"With significant population growth forecast, and changing demographics that will see a more diverse range of households, it is Government policy to support medium density 'own door' housing models in Ireland, alongside traditional housing and apartment developments. This policy is aligned to NPF priorities for compact growth and with Housing for All priorities to provide a greater range of housing options."*
- Submission is of the opinion that the Policy Objective PHP27 and Section 12.3.3.1 of the County Development Plan should consider the sustainability and viability of dwellings in the LAP area, and review Policy OCLAP19 – Residential Mix, in this context.
- Submission is of the opinion that the imposition of unviable 3-bedroom apartments is not in keeping with the Government's objective of providing family own door dwellings, (as set out in the Compact Settlement Guidelines) which Glenveagh will provide, without recourse to including undue quantum of 3-bedroom apartments.
- Highlights that household formation is such that there are many 1 child families compared to historical trends which should be reflected in the mix.
- Notes that the apartments/duplex units include a balanced and sustainable mix comprising some 71% own door dwellings in 43% houses, 28% duplex apartments, and 29% apartments (in apartment buildings) providing a sustainable mix of units comprising 5% - 4-bed, 39% - 3- bed, 39% - 2-bed and 17% - 1-bed in a range of typologies.
- Submission is of the opinion that while the Old Connaught area is identified as a new community, the purpose of mix includes a substantial amount of existing larger sized 3 and 4 bedroom dwellings to the east of the M11.

- Submission is of the opinion that the proposed mix is appropriate and will contribute to a wide range of dwelling typologies to cater for persons at different stages of the typical "life cycle."
- Notes that a recent LRD (permitted by DLR LRD24A/0382/WEB on the 11th of December 2024) relating to some 479 no. residential units in Shanganagh, Shankill, Co. Dublin, located in a New Residential Community (A1 zoned lands), allowed for a lower percentage of 3 bed apartments compared to Policy Objective PHP27 and Section 12.3.3.1 of the County Development Plan.
- Provides additional detail regarding the aforementioned LRD including the proposed mix of apartments DLR LRD24A/0382/WEB which was 23% 1 bed, 29% 2 bed and 26% 3 bed apartments.
- Refers to references from the Planner's report.
- Requests that Policy OCLAP19 – Residential Mix is amended to state the following:

Policy OCLAP19 – Residential Mix

*It is Policy that all new residential developments within the Draft Plan area shall **generally** (bolded in green) accord with the mix requirements set out in Policy Objective PHP27: Housing Mix and Section 12.3.3.1 of the dlr County Development Plan 2022-2028 **either individually or cumulatively with lands located within the neighbourhood (10-minute walk) or where the proportion of own door dwellings (apartments and houses) provided is greater than 50%** (bolded in green). In this regard, all planning applications for residential development within the Draft Plan area shall provide for a suitable mix of house types and sizes that meet the needs of a range of households and should incorporate flexible housing units that can be adapted to suit changing household needs.*

- Supports the delivery of a mix of dwellings and Policy OCLAP20 – Housing Options which seeks to support and promote housing options for older people and persons with a disability within the Draft Plan Area including Glenveagh-identified potential locational synergy between Jubilee Hall and its future SNI use, and the delivery of housing suitable for older people in proximity, to avail of supports.

Request 12: OLD PERSONS HOUSING

- Requests an objective to provide older persons housing in the area located to the south of Jubilee Hall in the form of low-rise single storey bungalow development which would sit comfortably within the area displayed in Figure 3.10.
- Includes Figure 3.10 which details a block concept layout proposing a location to achieve the objective regarding later living provisions.

Request 13: BUILDING HEIGHTS

- Notes that Section 4.3.3 of the Draft LAP sets out 'plan led' approach to building heights illustrated in Figure 4.3 (of the Draft LAP).
- Includes Figure 3.11 which displays an extract of Figure 4.3 from Draft LAP detailing building heights ranging from 2/3-storey to 4-storey + setback.
- Submission is of the opinion that the building heights should be indicative in nature and ranges provided as how they are indicated at the moment is unduly prescriptive and should not be so on concept/notional layouts and specific heights should be reserved for application stage.
- References the southern character area (Glenveagh Plot A), (to the east of Thornhill Road) and heights indicated are broadly similar to the heights which the design team have proposed in the concept layout.

- Provides an updated heights concept which broadly follows the original Draft LAP concept but amended to reflect updated layouts due to significant Uisce Eireann wayleave and necessity to revise the concept layouts.
- Requests that the heights in Figure 4.3 Draft LAP are updated to the heights indicated in Figure 3.12.
- Includes Figure 3.12 which outlines Glenveagh Lands proposed height strategy with a legend noting 1-2 storey residential buildings (including accessible units), 2-3 storey residential buildings, 2-storey residential buildings (including 3-storey landmark buildings), 3-4 storey residential buildings (including 5-storey elements along the LUAS) and 2-3 storey commercial buildings (anchor retail, retails, creche, GP, etc.) as well as long-term LUAS line, existing roads, proposed link streets, proposed local streets, proposed shared surfaces and tress line drive (to Jubilee Hall).
- Recommends that the final concept height diagram in the LAP is given some degree of flexibility so as not to constrain unduly the layout and detailed design and that the final heights diagram is labelled 'indicative.'

#### Request 14: RE-ZONING OF GREEN BELT AREA

- Notes that part of the southern portions of Plot B within the overall Glenveagh landbank are located outside of the Western Character Area. It is noted from the Dún Laoghaire-Rathdown County Development Plan 2022-2028 that this particular area is zoned for 'Objective GB' uses with the objective "*to protect and enhance the open nature of lands between urban areas.*"
- Includes Figure 3.13 which displays an extract of DLR CDP Zoning Map, showing indicative outline of Glenveagh lands in red and 'GB' parcel subject to rezoning request.
- Submission is of the opinion that owing to the characteristics and configuration of this land parcel and surrounding lands, that the designation of same for green belt uses it should be reconsidered in the context of the objectives of the Draft LAP.
- Submission is of the opinion that these lands are appropriate for residential development in accordance with the proper planning and sustainable development of the area, and in the context of the updated NPF as a result of the proximity of these lands to the future LUAS line.
- Emphasises the provision of residential development in this area would also be in line with the '10-minute neighbourhood' concept which is an objective of the Draft LAP.
- Notes that the GB zoning precludes the development of residential development, save for specific circumstances.
- Submission is of the opinion that it is inappropriate that residential development should be excluded from this area of the overall Glenveagh landbank as a result of the reasons given above.
- Requests the rezoning of this land parcel from 'Objective GB' to 'Objective A1' uses in order to accord with its overall landholding at Old Connaught which will ensure Glenveagh can deliver much-needed housing in a timely and orderly fashion adjacent to future public transport corridors and in proximity to the social infrastructure required to sustain residential populations.
- Provides justification for rezoning request in the context of local and national planning policy and within the context of Ireland's current housing crisis which would align with recent Government policy in seeking to zone additional residential zoned lands to deliver national housing targets and objectives, which Glenveagh would help to achieve as well as preventing piecemeal residential development across the Glenveagh landholding and/or the potential creation of improper and unorderly residential layouts.

#### Request 15: VILLAGE CORE CHARACTER AREA



- Highlights that the Draft LAP lands are in close proximity to a range of services in the adjacent built-up area of Bray.
- Notes that a number of existing local services are available within the 10-minute walking catchment of Old Connaught, in particular 2 No. schools as well as a variety of services available in Bray town centre are within a 7-minute cycle distance of Old Connaught.
- Notes that the nature and quantum of retail, commercial and community facilities and amenities to be provided should be appropriately considered.
- Submission is of the opinion that provisions should be appropriately scaled to address local day to day convenience needs while not adversely impacting on the higher order services already available within Bray town centre which will fall within 10-minute public transport and / or cycle distance.
- Notes that part of the northern portions of our clients' lands within 'Plot A' and the eastern section of 'Plot C' fall within the remit of the 'Village Core' Character Area.
- Highlights the vision for this Character Area is *"to provide for the sensitive development of the Village Core having regard to the distinct character and intrinsic qualities of the historic built area."*
- Includes Figure 3.14 which displays an extract from the Draft LAP of the site development Framework for the Village Core Character Area, with indicative location of Glenveagh lands outlined in red.
- Notes that the eastern portion of the Glenveagh lands at Plot C are to form a neighbourhood centre of 2/3 storey mixed-use/retail units, complete with public seating areas around a civic plaza.
- Details that the civic plaza is to have cafes and restaurants (with outdoor seating) and planting, including a mirroring of the existing mature oak tree at the centre of the village and an anchor supermarket retailer fronting onto the proposed link road between Ballyman Road and Ferndale Road (through Glenveagh lands) as well as an Urban Greenway and Active Travel Route to be provided through Plot C between the central civic plaza and Jubilee Hall.
- Acknowledges that the principle of the indicative layout of the lands Site Development Framework is considered to be predominantly reasonable and appropriate for the lands, save for a number of specific areas.
- Highlights that the inclusion of a neighbourhood centre use adjacent to the existing centre along Old Connaught Avenue is considered to be in accordance with the proper planning and sustainable development of the area and that the provision of a mixed-use centre at this location is considered appropriate to serve the surrounding expansion of residential development in the area.
- Acknowledges that the location of the neighbourhood centre is elevated significantly higher than the adjacent roads including at Old Connaught Avenue which will present a substantial challenge to the provision of the proposed civic plaza to the front of the neighbourhood centre area at this location, as envisaged by the Draft Plan based on the existing levels at this location.
- Submission is of the opinion that much of the plaza space will be taken up to gradually step up to the appropriate finished levels with the provision of accessible ramps to meet Part M compliance requirements made challenging also.
- Requests that the provision of the neighbourhood centre civic plaza, as proposed by the Draft Plan, is reviewed in more detail to ensure that it can be appropriately delivered, with respect to the existing levels at this location and/or that adequate flexibility is incorporated in the Draft LAP to allow for the levels to be appropriately managed.
- Acknowledges that the provision of an additional oak tree within the civic plaza area in an attempt to mirror the existing mature oak tree at the centre of the village is considered an appropriate urban design response for the village centre area as it will create a focal landmark and gateway at this location which will contribute positively to the sense of place for the village.

**SUBMISSION REQUESTS - OPEN SPACES, PARKS & RECREATION**

- Highlights proposal to provide 3 no. parks and open spaces across the Glenveagh lands which is considered disproportionate to the overall landholdings within the Draft LAP area:
  1. Old Connaught Village Green: a c. 1.5 ha open space to the northern portions of Plot A where its function is as a "Village Green providing quality placemaking and a focal point for the local community."
  2. Thornhill Road Park: a c. 1.2 ha open space to the north-eastern portions of Plot B where its function is as a "destination park providing a destination play area for the Old Connaught area."
  3. Jubilee Hall Park: a 2.65 ha park within Plot C (3.6 ha overall – 2.65 ha on Glenveagh Lands – remainder on DLR lands) where its function is as a "Heritage Park complementing the existing grounds and structures at Jubilee Hall and providing distinct character areas and uses which complement the existing grounds/structures and the natural environment." This equates to some 27.6% of the Plot C. Additional open space would be provided within the subject lands which would bring the total to c. 36.8% (based on a min 10% of the remainder of the lands excluding the area indicated for the neighbourhood centre). This is well in excess of the 25% INST provision in the County Development Plan.
- Submission is of the opinion that a requirement of an additional 10% of open within the now separate residential zoned areas would substantially sterilise the lands in terms of residential delivery and in effect severely restricting the development potential and these Glenveagh landholdings are located on lands identified as A1 residentially zoned land in the Dún Laoghaire Rathdown County Development Plan 2022-2028.
- Submission is of the opinion that it is unclear how the land uses indicated in the LAP are consistent with the Dun Laoghaire Development Plan and in particular the associated Land Use zoning map no. 14.
- Highlights that the Dún Laoghaire Rathdown County Development Plan 2022-2028 (DLRCDP) already makes provision for public and private open space requirements for new residential development, which will ensure a high level and standard of open space to serve the new residential communities.
- Includes Figure 4.1 which displays an extract from the Draft LAP of Figure 4.2 and outlines significant areas of F Zoned Open Space – Omitted from LAP Land Use with indicative location of Glenveagh lands outlined in blue.
- Notes that there are a number of existing recreational and open space facilities available in the immediate vicinity of Old Connaught including Bray Emmets GAA Club, 2 No. golf courses (Old Connaught Golf Club and Dún Laoghaire Golf Club), and a bowling club within the Dún Laoghaire Golf Club as well as a range of other existing recreation and open space provision is also within easy distance on the northern side of Bray such as Corke Abbey Valley Park, Shanganagh Park, Woodbrook Golf Club and at Fassaroe to the south (Enniskerry AFC).
- Highlights that Bray Emmets is the largest GAA Club in Wicklow and one of the largest sporting organisations in Co. Wicklow on a significant campus of c. 7 hectares and that the Club has c. 1,300 members which can avail of the 4-no. full sized pitches as well as a juvenile pitch and an all-weather pitch, 7 no. changing rooms, gym, hurling all, and indoor lounge area.
- Submits that Figure 4.2 of the Draft LAP outlines a spatial distribution of land-uses across the Draft LAP area and fails to include 2 no. significant open space

areas which are included on the zoning map for the area, namely Bray Emmets GAA Club and the lands adjacent to Old Connaught House.

**Request 16: THORNHILL PARK**

- Submission is of the opinion that the locations and quantum of space dedicated to 'Strategic Parks and Open Spaces' should be amended to both provide better quality spaces and maximise the development potential of the lands in response to its existing internal and external contexts, characteristics, and specifics.
- Suggests that the Open Space designation in Plot B would be better suited along the western boundary of Plot A owing to the high ecological value of this area with a number of mature trees (including Category B tree as per the figure below) as part of a wider ecological network of other trees, hedgerows and scrub playing host to a range of flora and fauna, including bats following a consultation with the project ecologist, Ilsa Rutgers Landscape Architecture and Altermar (IRLA).
- Noted by IRLA that a Strategic Park and Open Space area at this location would be a more appropriate use for the area as opposed to residential development which would be more intense and impactful in terms of vegetation removal, lighting and hard infrastructure/landscaping development and that existing ecological assets at this location can be appropriately and sensitively incorporated into a high-quality open space area that will have an additional ecological value and significance in comparison to the location designated for same in Plot B, which has little to no ecological value.
- Includes Figure 4.2 which displays a proposed relocation of Thornhill Park based on considerations of IRLA including references to trees, hedging, and places of heritage.
- Highlights the following input from IRLA:

*"The Landscape Appraisal of the site recommends relocating the zoning for Strategic Parks and Open Space to areas of the site which already have greater landscape assets such as existing trees, existing biodiversity and soil structure which has not been impacted by farming / ploughing.*

*It is important to preserve these areas of denser natural vegetation as they offer any proposed new development the following:*

- *Existing mature trees provide beauty, maturity and scale.*
- *Greater biodiversity due to variety of vegetation and intact soil structure.*
- *Opportunities for activity-based amenity within this unique woodland setting with its steep, undulating natural topography and natural vantage points over the surrounding site.*
- *Preservation of extant remains of the historic landscape including the avenue approach to Jubilee Hall, its demesne, hedgerows along Ballyman Road and the wooded demesne of Thornhill House."*
- Notes that the steep topography of this area (as suggested for relocation) will provide opportunities for natural play and unique walking trails as part of a 'Strategic Park and Open Space' area.
- Submission is of the opinion that the topography of this area will likely sterilise the potential for residential development in any case, the substitution between the 'Strategic Parks and Open Spaces' designation and this area of residential lands is considered to form a more appropriate and reasonable use of the lands which will maximise development potential as well as being centrally located, accessible from the centre of Old Connaught and will benefit from the development of the LUAS to its south.
- Requests that Dún Laoghaire-Rathdown County Council amend the Site Development Framework for the subject lands to relocate the Thornhill Road

'Strategic Parks and Open Space' area from Plot B to the western portions of Plot A, as indicated.

#### Request 17: JUBILEE HALL PARK

- Notes that the current arrangement of the Draft LAP includes c. 2.65 hectares of open space indicated where currently there is A1 zoned land (as it relates to GVH, with the remainder of the 3.6 hectares on DLR lands to the west).
- Supports the careful restoration of Jubilee Hall, within an appropriately framed layout.
- Submission is of the opinion that the current proposals in the Draft LAP are irrational, prejudicial to our clients' interests, and would deliver, in their current form, a sub optimal form of development.
- Highlights the commentary of the Draft LAP in seeking to bring Jubilee Hall back into an active community use is also welcomed by Glenveagh.
- Submission is of the opinion that the Strategic Development Framework of the area can be improved, as it relates to Jubilee Hall.
- Submission is of the opinion that the Jubilee Hall structure would require sufficient enclosure, passive surveillance and activity within its surroundings to ensure its protection from antisocial behaviour and the safety of its users, whilst also providing for an upgraded sense of urban enclosure based on commentary from John Cronin and Associates in Appendix 1.
- Submission is of the opinion that that the 'Strategic Parks and Open Spaces' area surrounding Jubilee Park would benefit from the inclusion of a number of residential type units to provide same.
- Submission is of the opinion that appropriate forms of residential development for Jubilee Hall includes bungalows, mews and/or sheltered/assisted living development as they would be able to provide an appropriate level of development intensification that would strike the balance between an enhanced level of urban enclosure whilst simultaneously remaining sensitive to the setting and nature of the Protected Structure as well as improving the residential and population mix of the area to ensure a healthy and sustainable community is harboured.
- Requests that Dún Laoghaire-Rathdown County Council include an objective within the Draft Old Connaught Local Area Plan which allows for the development of bungalow, mews and/or sheltered/assisted living around Jubilee Hall Park, as per the suggested text below:

***"It is an objective that Jubilee Hall Park will accommodate residential development including sheltered / assisted living bungalows to its south to ensure its protection from antisocial behaviour and the safety of its users, and to provide an upgraded sense of urban enclosure surrounding Jubilee Hall Park"*** (bolded in green).

- Includes Figure 4.3 which displays the proposed location for later living bungalow units (circled in yellow) and framing residential houses (orange) on Glenveagh landholdings.
- Highlights the inclusion of a discrete area of development which would result in a more sustainable quantum of open space within this land parcel in contrast to the c. 27.6% of the Plot C. Additional open space would be provided within the subject lands on the remainder of the A1 zoned lands which would bring the total to c. 36.8% (based on a min 10% of the remainder of the lands) as well as being in excess of the 25% INST provision in the County Development Plan.

#### Request 18: INCLUSION OF UNITS TO THE NORTH OF JUBILEE HALL

- Requests a rearrangement to the Jubilee Hall Park, with some development to the north, to provide sufficient passive surveillance, all within the social hub within a restored Jubilee Hall.

- Includes the John Cronin heritage note in Appendix 1 which outlines the following in relation to the Deady Gahan Architects layout in Appendix 5:

*"The placement of housing to the north and east of the protected structure seeks to ensure that the protected structure does not end up peripheral to the new housing stock and provision. The development strategy will see Jubilee Hall as a landmark and centrepiece that houses community uses and which is publicly accessible; the historic drive will be maintained as the principal access. However, rather than being isolated from housing, the development strategy proposed by Glenveagh will see substantial open space being provided around Jubilee Hall.*

*The form of residential development in the vicinity of the protected structure will be such that provides passive surveillance to the protected structure and will ensure that there are no potential backland areas (leading to anti-social behaviour) created to the north of the historic building. The development strategy proposed by Glenveagh will also see some specific types of residential uses, for example, later living units in the form of bungalows, that can benefit from the community uses of Jubilee Hall."*

- Offers a justification based on the amount of open space being provided over and above the requirements of the INST objective in the CDP.
- Submission is of the opinion that the existing houses at this location will play a role in the passive surveillance and framing of the adjacent church and graveyard and that the urban greenway proposal is a more sympathetic and realistic development opportunity to the existing streetscape and characteristics of the area.

#### Request 19: VILLAGE GREEN

- Requests the removal of the objective to develop the Old Connaught Village Green at this location and develop an Urban Greenway including an additional vehicular access from the southern character area to Old Connaught Avenue to through this parcel of land by Dún Laoghaire-Rathdown County Council.
- Submission is of the opinion that there is no justification to propose a Village Green on existing residences located along Old Connaught Avenue and that the Draft LAP fails to consider is the fact that the designated 'Strategic Park and Open Space' area is located across 5 no. existing habitable detached houses which means the development of the Old Connaught Village Green would require the demolition of the existing housing stock in the village and that is not appropriate nor in accordance with the proper planning and sustainable development of the area, especially in the midst of a significant housing crisis.
- Submission is of the opinion that it is inappropriate to de-zone the existing, inhabited 5 no. residences along Old Connaught Avenue and other inhabited dwellings for open space provision when there is a vacant plot which offers excellent access to Plot A (in addition to the Draft LAP access further to the east).
- Submission is of the opinion that these residences provide an appropriate buffer to the Graveyard to the lands to the south, maintaining the established views along Old Connaught Avenue as well as providing passive surveillance to the Graveyard, which an open space area would not achieve.
- Submission is of the opinion that the urban greenway proposal is a more sympathetic and realistic development opportunity to the existing streetscape and characteristics of the area.
- Requests the removal of the objective to develop the Old Connaught Village Green at this location and develop an Urban Greenway including an additional vehicular access from the southern character area to Old Connaught Avenue to through this parcel of land by Dún Laoghaire-Rathdown County Council.

- Requests that the phasing table updated to omit objective regarding development of the Old Connaught Village Green as well as an Urban Greenway/access through the land as it effectively places a significant constraint on the ability to develop the entire southern and western character areas.

Request 20: ALLIES RIVER ROAD ACTIVE PARK & COMMUNITY FACILITY (PRIMARY)

- Requests that Table 11.2 remove the requirement for the southern and western character areas to deliver the Allies River Road Active Park and Community Facility as the lands are not adjacent to or relevant to the Glenveagh lands and has resulted in a significant reduction in the amount of residential developable lands for Glenveagh's landholding.
- Submission is of the opinion that the park and community facility should be delivered by landowners located to the north of Old Connaught Avenue.
- Notes that John Cronin and Associates undertook a built heritage inspection of Jubilee Hall on the 30th of January 2025 which found the building disused and in poor condition having been vacant since 2008.
- Highlights that access to the interior is restricted as sections of the roof have collapsed and refers to a note in Appendix 1 presenting a review of the strategy proposed by Glenveagh in respect of the subject lands.
- Notes that the balance of the landholding surrounding Jubilee Hall is much altered and devoid of architecturally significant features such as disused prefabricated classrooms are located to the west of the house, a surface carpark and a pair of tarmac-surfaced tennis courts located to the northeast of the house and former tennis courts that are served by a series of concrete steps.
- Notes the altering of the historic house's landscape and that from the 1980s, the grounds were adapted for modern leisure activities including changes like:
  - Removal of existing trees within the park to the eastern side of the site.
  - New planting and land sculpting to create a new mini golf course.
  - Planting of a circle of evergreen trees around Jubilee Hall which severs the connection between the building and the broader landscape.
  - New tennis courts.
- Emphasises that Jubilee Hall is a protected structure and any plan to develop the former demesne lands around must take cognisance of its protected status and be designed sympathetically to avoid impacting on its setting, which is an intrinsic value of the structure.
- Notes that the proposed development scheme has been informed by research undertaken for this report along with an assessment of the existing landscape character by Ilsa Rutgers.
- Suggests to retain, refurbish and repurpose the historic house as a community hub which will ensure that the building is accessible to the public and will form a centrepiece of the proposed residential development.
- Highlights the preliminary site layout prepared by Deady Gahan Architects in Appendix 5 which retains the area around Jubilee Hall and uses the historic drive as a main access within the proposed residential scheme.
- Highlights the emerging landscape strategy for the site sees the creation of generous public open space around Jubilee Hall as well as connections to Ballyman Road and Old Conna which will be maintained and recreated.
- Notes that appropriately scaled housing along the northern boundary would also serve to provide passive surveillance in respect of the lands to the north.
- Notes that it is an objective of the Draft LAP to seek the regeneration of Jubilee Hall as part of the wider re-development of the Western Character Area that results in a viable modern use for the building.

Request 21: JUBILEE HALL AS A FUTURE COMMUNITY HUB/USE

- Supports the restoration of Jubilee Hall and sees a future community use for the protected structure.
- Highlights that restoration works to Jubilee Hall, a protected structure (RPS Ref. 1979), are considered as part of the LRD S.247 request proposals in order to allow Jubilee Hall to be brought back into active use as a potential community use (to be determined in consultation with Dun Laoghaire Rathdown County Council).
- Notes that this would provide the Sustainable Neighbourhood Infrastructure (SNI), required under Section 12.3.2 of the DLR CDP (with the agreement of the Planning Authority) by the provision of an appropriate SNI facility with a floor area of 130 sq.m. per 1,000 population equivalent.
- Highlights that it is a further objective of the concept DGA layout to enhance and extend the public realm setting of Jubilee Hall through the integration of the Protected Structure with strategic public open space surrounding the structure, as part of Jubilee Hall Park.
- 

## CONCLUSION

- Emphasises that the focus for the Draft LAP should be ensuring the adequate provision of housing delivery in the Key Town of Bray, to deliver the core strategy numbers of c. 2,000 units within the Draft LAP, within the remainder of the Dun Laoghaire Rathdown County Development Plan 2022-2028 and, in order to meet the core strategy housing targets, there should be no phasing of residentially zoned lands in the adopted Local Area Plan for Old Connaught, where the enabling infrastructure can be provided.

## APPENDIX 1: John Cronin and Associates Heritage Report

- Provides a short statement to support a submission on the Draft Old Connaught Local Area Plan (LAP) by Glenveagh Homes prepared by John Cronin that refers to the area identified as Southern Character Area and partially to the Western Character Area and the Village Core.
- Highlights the focus of this appendix, a protected structure, Jubilee Hall which is located within the northwestern portion of the lands owned by Glenveagh.
- Includes photos displaying disuse and poor conditions as a part of the detailed assessment and survey of the building's condition and fabric.
- References the Draft LAP over-arching approach to built heritage policies with the following four broad objectives:
  - 1. Regeneration: Seek the regeneration of Jubilee Hall as part of the wider redevelopment of the Western Character Area. Proposals that improve, extend, or change the use of Jubilee Hall to result in a viable modern use will be considered positively, subject to appropriate design, materials, and construction methods.
  - 2. Holistic Approach: Ensure that proposals for the protected structure form part of an application for the wider redevelopment of the area.
  - 3. Public Realm Enhancement: Enhance and extend the public realm setting of Jubilee Hall by integrating the Protected Structure with strategic public open space surrounding it (see section 8.4.1.6 of the Draft LAP).
  - 4. Integration of Former Walled Gardens: Integrate the former walled gardens of Jubilee Hall as a heritage feature as part of Jubilee Hall Park.
- Acknowledges the demonstration of adherence to the Draft LAP Built Heritage Objectives including the regeneration of the historic Jubilee Hall as a community hub, undertaking a holistic approach as shown in the development and landscape strategies as well as the integration of Jubilee Hall with the strategic public open space surrounding it to ensure the provision of a public realm setting.

- Notes that Jubilee Hall Park will be an active and engaging open space as well as being supportive of the integration of the former walled gardens of Jubilee Hall (located to the west of our clients' lands) as a heritage feature as part of Jubilee Hall Park.
- Recognises the archaeological heritage of the area and commits to commissioning detailed archaeological assessments as a part of the planning application process.
- Requests an amended configuration of Jubilee Hall Park to allow for the placement of housing to the north and east of the protected structure.
- Notes the maintenance of the historic drive as the principal access.

## **APPENDIX 2: Systra Technical Note**

- Provides a brief note evaluating the transport processes and recommendations adopted in the preparation of the ICAS and Draft LAP, focussing on movement and transport and reviews the proposed transport solutions and their impact on the phasing of the development.
- Includes key observations that have been previously generally summarised in this submission.
- Summarises Part 3: Options Development and Assessment Report of the ICAS report including the assessment process, modelling, the multi-criteria analysis, and the transport packages which are as follows:
  - Package 1: Series of active travel links internal to the LAP, plus two active travel links over the N11 north and south of Junction 5. Elimination of through traffic on Old Connaught Avenue via Bus Gate at Ferndale Road and Thornhill Road. North South Road proposed linking to Rathmichael, but no new major road infrastructure planned to the south or over the N11.
  - Package 2: Removes internal North-South Road and is based on the upgrade of Ferndale Road and Old Connaught Avenue. Public transport priority maintained through Old Connaught Village.
  - Package 3: Elimination of through traffic on Old Connaught Avenue via two bus gates at M11 bridge and junction of Ferndale Road / Thornhill Road. Creation of a new vehicular bridge over N11 to north of junction 5. It is noted that should the N/M11 Junction 4 to Junction 14 scheme progress then further consideration should be given to the progression of this link.
  - Package 4: As with package 1 and 3, through traffic is eliminated. No new road is proposed over the N11, instead traffic is diverted north towards Rathmichael or south to Fassaroe.
  - Package 5: Proposed upgrade of Old Connaught Avenue to facilitate all transport modes. Includes provision of new active travel bridge over the M11 alongside the existing.
- Notes Part 5: ICAS Final Study which presents the infrastructure requirements of the LAP, as well as the recommended phasing, implementation, and funding.
- Acknowledges the phasing programme which is summarised as follows:
  - Phase A: First phase of development for 850-1000 new homes;
  - Phase B: Sequentially next phase of development for 1,300 to 1,400 new homes; and
  - Phase A to C: Enabling infrastructure e.g. attenuation, educational facilities etc.
- Refers to the N11/M11 Junction 4 to Junction 14 Improvement Scheme and the N11/M11 Bus Priority Interim Scheme in relation to phasing.
- Indicates that no information is given on the potential costs of the schemes or how they are likely to be funded.
- Provides a review of Old Connaught Draft Local Area Plan 2025 including notes related to Chapter 12 of the Draft LAP which focuses on high-level monitoring and evaluation. Recommends consideration is given to amendments to phasing.



- Highlights Policy OCLAP67- Monitoring and evaluation and is of the opinion that the provision of a more specific outcome orientated evaluation monitoring framework (i.e. mode shares / capacity of the network etc., rather than purely infrastructure delivery driven) would be beneficial as it would provide a more effective mechanism for assessing the Draft LAP delivery against local/national policy targets and would enable developments to come forward with potential alternative infrastructure solutions which meet the Draft LAP outcome-orientated objectives/targets.

### **APPENDIX 3: Atkins Realis Technical Note**

- Provides a comprehensive review of the Draft Local Area Plan and associated documents such as the Infrastructure Capacity Assessment Study (ICAS), specifically Part 5 – Final Study
- Refers to ICAS report comments regarding a proposal for a looped water main and notes that the proposed looped mains through Glenveagh's Southern Character Lands would require the infrastructure to be sized for the densities on the Central Character Lands located to the North and thus potentially increasing the size of the infrastructure to be installed. In relation to foul infrastructure, submission highlights the confirmation of the capacity of the Shanganagh WWTP to serve the lands.
- Notes the ICAS suggested pump station locations including two temporary pump station locations off Old Connaught Avenue and a permanent strategic pump station adjacent to the M11 as well as foul infrastructure requirements outlined in Table 2-3 of the ICAS report.
- Notes the drainage infrastructure layout within the ICAS which includes a regional pond location as well as drainage infrastructure requirements outlined in Table 2-4 of the ICAS report.
- Recognises the review of alternative suitable locations proposed for the permanent pumping station on Glenveagh landholdings in Phase B.
- Submission is of the opinion that further options should be examined in consultation with Uisce Éireann to allow for the increased size of wet well and emergency storage to remove the need for a rising main under the M11 and for the existing ducting within the bridge as the permanent solution. Acknowledges the potential for an additional pond in the Phase B – Southern Character Area and outlines a justification for the addition of the pond on the basis of a SuDS perspective in terms of Water Quantity, Quality and Biodiversity.
- Notes that the proposed attenuation pond that would be sized to cater for up to the 1 in 100 yr storm event combined with upstream attenuation and associated treatment volumes prior to controlled discharge to the existing water course on the Glenveagh landholdings in Phase B.

### **APPENDIX 4: DOBA Wastewater Masterplan**

- Provides a report in relation to locating a strategic wastewater pumping station (WwPS) to serve the residential zoned lands at Old Connaught Avenue based on publicly available information and a site visit on subject lands.
- Summarises the attributes of the existing lands including proposed new residential zoned lands on Glenveagh landholdings as depicted in DOBA Drawing C-0001.
- Provides a review of the Draft Old Connaught LAP including indication of proposed WwPS location, notes regarding the topography of the location, and an extract from the proposed vehicular transport map highlighting a buffer zone as well as a layout of the proposed road network to serve Draft LAP lands north of Old Connaught Avenue.
- Includes an Appendix A which outlines the Uisce Éireann Confirmation of Feasibility (CDS24006358) request.

**APPENDIX 5: Deady Gahan Architects Booklet**

- Provides a detailed description of site location, site context (in relation to Bray Town Centre) as well as subject site and surroundings.
- Includes accompanying visual materials displaying the Old Connaught area in reference to Dublin City Centre, the Greater Dublin Area, Bray, and additional catchment areas.
- Refers to the Dún Laoghaire-Rathdown County Development Plan 2022-2028, and relevant zonings for the subject site as well as an accompanying extract from the CDP map outlining the subject site landholdings.
- Refers to Draft Old Connaught Local Area Plan 2025 and relevant proposed land uses and movement strategies as well as an extract from the Draft Plan outlining the subject site landholdings within the context of the overall Draft Plan layout.
- Refers to Draft Old Connaught Local Area Plan 2025 and relevant proposed land uses, residential densities and building heights strategies as well as two extracts from the Draft Plan outlining the subject site landholdings within the context of land use, residential densities and building heights.
- Highlights that the purpose of this document is to outline the character and constraints specific to the subject site and to suggest possible changes and additional items that should be taken into consideration while finalizing the Old Connaught Draft LAP.
- Includes a map outlining site constraints/potentials and design opportunity within the context of accessibility and constraints which notes several protected structures within and around the site, several trees that need to be preserved, two ESB powerlines running through the site that will be shifted underground, Irish Water pipes running north to south and LUAS line land reservation.
- Includes a map outlining site constraints/potentials and design opportunity within the context of topography and natural features which notes the existing topography, several trees and hedgerows to be integrated into future schemes, and an area of great steepness and high ecological value that could accommodate a Strategic Park and Open Space.
- Includes a historic map displaying Jubilee Hall, a brief about its history, its connection to Old Connaught and photos of its current conditions.
- Includes a map which indicates proposed rearranged land uses, key structuring principles and density.
- Includes a map outlining site accessibility which notes Bray Town, the nearest bus stop and its footpath connection to proposed site entrance, bus routes serviced by bus stop, long-term LUAS line, existing roads, proposed link streets, active travel paths, building forms and trees line drive (to Jubilee Hall).
- Includes a map outlining open spaces and pedestrian links which note the long-term LUAS line, existing roads + footpaths, proposed pedestrian and cycle paths along link streets, proposed amenity walks (pedestrian and cycle links), proposed footpaths, building forms and open spaces.
- Includes a map outlining LRD Site Layout presented at the S247 Meeting.
- Includes a map indicating a revised concept layout in response to the Draft LAP.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapter 1, 4, 5, 6, 8, 9, 10, 11, 12 and Appendix 1

**DLR Submission No: B0065**

**Person: Woodbrook College**

**Organisation: Woodbrook College**

**Summary of Submission / Observation:**

- The submission notes support of the proposed Draft Plan and furthermore confirms that they are actively engaging with Castlethorn and DLRCC on a planning proposal that will facilitate and support the infrastructural linkages proposed in the Draft LAP.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapter 6

**DLR Submission No: B0066**

**Person: Kieran Ward**

**Organisation:**

**Summary of Submission / Observation:**

- Submission is of the opinion that the plans have not taken the current residents of the area in consideration regarding the access and use of the surrounding area for recreational purposes which will be constricted during construction phases and shift the area from countryside to residential.
- Submission is of the opinion that the plans indicate that Phase 1 will be built without upgrading existing infrastructure. Enquires about what plan for construction traffic during initial phases has been determined given the existing congestion on Old Connaught Avenue.
- Notes that Phase 1 is to be built on septic tanks and highlights that 1,189 Domestic Waste Water Treatment System (DWWTS) inspections were completed by local authorities in 2023 and 45% of DWWTS failed inspection with many systems identified as a risk to human and environmental health. Enquires how these fit within the stated sustainable nature of the plan.
- States that there is no evidence of collaboration with Bray Town/Wicklow Councils in the plan which shares the county border. Notes the impact that planning permission and applications for the 1,200 homes at Sea Gardens nearly opposite the bottom of Old Connaught Avenue will have on the Dublin Road artery to Wilford roundabout.
- Emphasises the need for collaboration between LAPs for Bray, Rathmichael and Kiltiernan due to potential impact.
- Cites concerns about the lack of commitment from the Department of Education for schools in the area as well as the National Transport Authority to bring the LUAS/build roads in the area.
- Raises issue with the lack of commitment for other amenities like healthcare, etc.
- Notes that Phase 1 could bring 1,000 residents to the area with no upgrade to current infrastructure and resources thus impacting existing residents and their surroundings.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s)**

Chapters 5, 6, 11 and Other Issues

**DLR Submission No: B0067**

**Person: William Somerville-Large**

**Organisation: Committee member, Old Connaught Residents' Association**

**Summary of Submission / Observation:**

- The submission notes the identification of Thornhill Road in the Draft Plan as rural. It highlights the issue of many residents deciding to use it as their primary access route to the M11 rather than the proposed road network in the area.
- The submission notes the narrow and steep nature of Thornhill Road, highlighting the difficulties of cars passing each other on certain stretches.
- The submission notes the disregard of road signs on Thornhill Road by most commercial traffic.
- The submission notes large volumes of traffic using the road from St. Gerard's School and those using it as a 'rat run' to avoid congestion on the M11.
- Submission requests that under the new road network in the southern character area, those travelling along the southern distributor road would not be allowed turn left at Thornhill Road, except for local access.

- The submission requests that all possible measures be put in place to discourage through traffic from making use of Thornhill Road from Old Connaught.
- The submission requests in the interim, an enhanced 3 tonne signage be erected to dissuade unsuitable commercial traffic.
- The submission states that any reopening of Love Lane would be non-sensical due to the difficulties in connecting it to existing footpaths on Thornhill Road.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapter 6

**DLR Submission  
No: B0068**

**Person: Seamus Deane**

**Organisation:**

**Summary of Submission / Observation:**

- The submission notes home ownership at Ferndale Road in the vicinity of the Draft LAP area.
- The submission notes a lack of communication and consultation from the local authority regarding plans in the vicinity of their property.
- The submission also notes inadequate publicity around the consultation phase and claims this undermines the trustworthiness of the process.
- The submission objects to any widening of the right of way as such an intervention would leave their property vulnerable to crime and trespass.
- The submission notes the Draft LAP would result in the destruction of the tranquil rural setting of the area.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapters 1, 4 and 6

**DLR Submission  
No: B0069**

**Person: Anne**

**Organisation:**

**Summary of Submission / Observation:**

- Objects to the road closures and one-way systems as a resident of Old Connaught Road that needs access to St Gerards's school via Old Connaught Road onto Thornhill Road and does not understand the purpose of the proposed circuitous route.
- Submission is of the opinion that the proposed new route is not feasible as it requires users to drive through Shankill traffic to access the school and requests for this to be revised.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapter 6

**DLR Submission  
No: B0070**

**Person: Karin Petrie**

**Organisation:**

**Summary of Submission / Observation:**

- Supports the plan's objectives of enhanced connectivity, sustainable transport, and improved public realm. Cites concerns regarding safety, security, and residential amenity particularly in relation to proposed permeability routes, greenways, active travel corridors, and public open spaces especially when interfacing with existing residential areas.
- Notes that the proposed new routes traverse areas that, in the absence of detailed development proposals, lack natural surveillance or visibility from public roads or inhabited frontages. Highlights that these routes may feel unsafe for users and become vulnerable to anti-social behaviour (particularly at night) unless careful planning and oversight is implemented.
- References route recommendations from the Design Manual for Urban Roads and Streets (DMURS) designed to ensure safety, avoid isolated areas, guarantee

visibility and that the areas are well-lit and overlooked. Requests the Council ensure all proposed and future routes are compliant with aforementioned principles.

- Emphasises the need to protect privacy, security, and amenities when new public routes adjoin existing residential properties. Requests the LAP include provisions requiring developers deliver high-quality, secure boundary treatments - such as appropriately finished granite walls of suitable height - to protect residents from noise, trespass, or the loss of amenity. Submission acknowledges that this request is consistent with the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2009) which advocate for design and layout approaches promoting a sense of safety and security via natural surveillance and appropriate boundary treatments.
- Suggests the Draft LAP include a requirement for planning applications proposing new permeability, greenways or active travel infrastructure to be accompanied by a formal Safety and Security Assessment (SSA) which should be:
  - Be based on Crime Prevention Through Environmental Design (CPTED) principles;
  - Address issues such as lighting, sightlines, and risks of anti-social behaviour;
  - Be informed by engagement with An Garda Síochána where appropriate.
- Highlights how this suggested requirement would strengthen the Draft LAP's alignment with the National Planning Framework and build public confidence in the delivery of safe, well-integrated connectivity infrastructure.
- Addresses the proposed new parkland midway along Old Connaught Avenue in the Draft LAP and welcomes green space as a general principle. Cites concerns that withstanding appropriate design and management, the proposed new parkland could become vulnerable to unregulated/unauthorised informal land uses which the community has previously experienced. Emphasises how these practices damage parkland, undermines its amenity value and reduces safe recreational use for the wider community. Notes that adopting the Residents' Association proposals for the village core area would eliminate the need to locate the park on Old Connaught Avenue and that this aspect of the plan would benefit from a thorough application of CPTED principles.
- Welcomes the proposal to restrict vehicular traffic on Old Connaught Avenue in principle. Raises issue with unintended misuse of newly traffic-free roads and the potential for these spaces to become subject to informal use by unregulated modes of transport and movement (mechanical and non-mechanical) that could compromise public safety barring appropriate deterrents and monitoring implementation. Without deterrents and monitoring solutions, pedestrians and cyclists could be discouraged from using the route thus undermining the plan's active travel objectives.
- Requests that the mitigation of the aforementioned risks take place via:
  - A behavioural risk assessment be undertaken prior to implementation;
  - Traffic-calming measures, such as staggered bollards and filtered permeability, be incorporated into the design;
  - The area be designed to encourage active, legitimate use, supported by passive surveillance from inhabited frontages on the avenue—reinforcing the earlier point regarding the proposed parkland location.
- Concludes with a statement demonstrating an appreciation for the opportunity to contribute to the development of the Old Connaught Draft LAP process and emphasises the need to consider the submission's points in the finalisation of the plan.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapters 6 and 8

<b>DLR Submission No: B0071</b>	<b>Person: Claire Miller</b>	<b>Organisation:</b>
<b>Summary of Submission / Observation:</b> <ul style="list-style-type: none"> <li>The submission notes support for the building of more houses to help alleviate the housing crisis but has some concerns in relation to the Draft LAP.</li> <li>The submission notes the negative impact the proposed closing of Old Connaught Avenue to make a bus gate thereby prohibiting access to Ferndale Road and implores the council to remove the bus gate and to maintain access from Old Connaught Avenue to Ferndale Road and Thornhill/Ballybride roads as well as the new planned roads. The submission notes that free access for cars on all routes would aid traffic dispersal across all routes and increase accessibility to new amenities for existing residents.</li> <li>The submission notes that in a situation where a bus gate is necessary, it requests that it be moved further west to allow residents to drive over the M11 and access the proposed distributor road network.</li> <li>The submission also notes the importance of access to homes when vehicles are utilising Junction 5 to exit the M11 Northbound and crossing over the M11 to access Old Connaught Avenue.</li> <li>The submission notes concern with the proposed indicative LUAS route crossing the M11 at Old Connaught Avenue and requests that the route to Fassaroe be progressed instead.</li> <li>The submission states the density proposed in the Draft Plan is too high and out of character with the area.</li> </ul>		
<b>Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):</b> Chapters 4 and 6		

<b>DLR Submission No: B0072</b>	<b>Person: John Coveney</b>	<b>Organisation:</b>
<b>Summary of Submission / Observation:</b> <ul style="list-style-type: none"> <li>References two videos published on YouTube that are included in the submission: 'Old Connaught Local Area Plan &amp; A new Vision for "Shanganagh-Rathdown Park" (initially submitted during pre-draft consultation phase) and 'It's Time to Expand Shanganagh Park in Shankill along the Allies River Road'.</li> <li>Cites concerns regarding urban sprawl and lack of public transport (initially discussed during pre-draft phase) in the absence of a firm date for LUAS line.</li> <li>Notes connectivity along the Allies River Road and biodiversity issues. Welcomes commitments to protection of the Ballyman Glen SAC both physically and pertaining to groundwater pollution.</li> <li>Indicates that the lack of enhancement regarding the Glenadoo Mountain to Shanganagh Park biodiversity corridor along the Allies River Road is disappointing. References the indicative blue arrows in the Draft LAP for connectivity with Allies River Road as vague and acknowledges the attempt to reverse the severing of the road made by the M11 in the early 1990s. Highlights the lack of mention of the Specific Objective 108 ('to reconnect the Allies River Road across the M11 for pedestrian and cyclists') despite commitments to align the Draft LAP with the County Development Plan. Indicates it is difficult to understand the lack of inclusion of Specific Objective 108 in the Draft LAP considering frequency of discussion about connectivity for active travel in plans.</li> <li>References Shanganagh Park expansion and indicates how the expansion of Shanganagh Park westwards to the M11 would be of huge benefit for biodiversity and the people of Shankill and how a similar proposal for the continuation of the park westwards along Allies River Road in Old Connaught will have the same benefits for residents. Suggests the woodlands along this road should be retained and managed for greater biodiversity and public access. Notes that the proposed Allies River Road active area should include a biodiversity feature to strengthen the Glenadoo Mountain to Shanganagh Park corridor.</li> </ul>		



- Concludes with a request to ensure net biodiversity gain in the Old Connaught Draft LAP by enhancing the Glenadoo Mountain to Shanganagh Park corridor along the Allies River Road.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapters 4, 6, 7 and 8

DLR Submission No: <b>B0073</b>	Person: <b>Alan &amp; Mary Kennedy</b>	Organisation:
<b>Summary of Submission / Observation:</b> <ul style="list-style-type: none"> <li>• Notes examination of the Old Connaught Draft LAP and attendance at open evenings at the St. Gerard's School.</li> <li>• Cites concerns regarding the road plan and access to Bray town centre and the N11.</li> <li>• Highlights residing on Thornhill Road and the challenge of drivers using the road to avoid congestion on the N11 which creates a 'rat run' on Thornhill Road. Notes the arrangements parents in St. Gerard's have which results in those going south of Bray driving in convoy during certain times of the day through the narrow bend of the road and out at Fassaroe exit.</li> <li>• States that the planned Bus-Gate and proposed vehicular circulation shifting people travelling into Bray from this area of new development towards the new link road and over the new bridge as unreasonable. Submission indicates that the existing rat run along Thornhill Road will be a more attractive route and increase the volume of traffic on an already congested road.</li> <li>• Raises issue with the proposed new link road over the N11 and access to Bray for residents of new developments, specifically the increase in cars on the Wilford roundabout which is already congested with existing traffic volumes and will increase in congestion prior to the opening of two large developments in Shankill.</li> </ul>		
<b>Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):</b>		
Chapters 6		

DLR Submission No: <b>B0074</b>	Person: <b>Christopher &amp; Lily Byrne</b>	Organisation:
<b>Summary of Submission / Observation:</b> <ul style="list-style-type: none"> <li>• The submission notes that concern that the proposed road network in the Draft Plan will lead to increased traffic along Thornhill Road, which is incapable of handling such.</li> <li>• It notes further concern that the southern distributor road is not being extended to Fassaroe, and notes that a proposed connection from Thornhill to Ballyman Roads will not be sufficient.</li> </ul>		
<b>Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):</b>		
Chapter 6		

DLR Submission No: <b>B0075</b>	Person: <b>Department of the Environment, Climate and Communications</b>	Organisation: <b>Department of the Environment, Climate and Communications</b>
<b>Summary of Submission / Observation:</b> <ul style="list-style-type: none"> <li>• Notes the submission's outline of observations regarding a number of policy areas for which the Department is responsible.</li> <li>• Outlines the Department's legally binding objectives as set out in the Climate Action and Low Carbon Development (Amendment) Act 2021 (the Climate Act) including commitments to climate neutrality, transitions to a net zero and climate neutral economy and the establishment of a legally binding framework ensuring</li> </ul>		

appropriate processes are in plan to deliver national, EU and international climate goals and obligations in the near and long term. Notes the importance of devising strategies to reduce and manage climate change risks via a combination of mitigation and responses both in the medium and longer term.

- Describes the Department's vision and highlights its alignments with the UN 2030 Agenda for Sustainable Development and the 17 SDGs.
- Emphasises the need for strong leadership across the Government and wider public sector to ensure a transition from low carbon to a climate neutral Ireland and underscores the need for engagement with local authorities to build resilience in a variety of stakeholders in order to align with the Department's vision and goal of facilitating a truly Circular Economy. Additionally notes how this engagement will help the Government to deliver a successful implementation of the SDGs particularly Goal 7, 12 and 13. Highlights a required change in Irish life but also acknowledges the environmental, economic and social benefits that will result from the Government's plan, collaboration with the public sector and resilience building with stakeholders.
- The Department requests that the Planning Authority take into consideration the framework of Agenda 2030, the Sustainable Development Goals (SDGs) and their respective targets within the overall drafting of the Plan and in relation to specific areas outlined further in the submission.
- Outlines the legislative context for the Draft LAP and the Department notes the positive objectives of the Dún Laoghaire-Rathdown County Development Plan (DLR CDP) 2022-2028 regarding the creation of a climate resilient county which is also an overarching strategic outcome of the DLR CDP.
- States that county level objectives should be reflected through Draft LAP objectives and actions as relevant to the plan area to support the implementation of national, regional and county level policy and lists recommendations intended to further strengthen objectives of the Draft LAP.
- Outlines the purpose of the Climate Action Plan 2024 (CAP24) and indicates the progress of the plan over the past three years. Recommends that the Local Authority ensure the Draft LAP references and supports the consistent implementation of CAP24 in accordance with Section 15(1) of the Climate Action and Low Carbon Development Act, 2015 (as amended).
- Notes policy of the DLR CDP 2022-2028 with regard to National Climate Action Policy (Policy Objective CA1), which supports the implementation of International and National objectives for climate change, including the CAP and National Adaptation Framework (NAF).
- Welcomes the policy context of the Draft LAP (3.2 Policy Context) which states that by implementing the Draft LAP, the Council will support relevant provisions contained in the National Climate Change Adaptation Framework (2018), the National Mitigation Plan (2017), the CAP24, the National Energy and Climate Plan 2021-2030, DLR's Climate Action Plan 2024-2029 and any Regional Decarbonisation Plan.
- Welcomes the preparation of the Draft LAP with the purpose of the integration, implementation provision of CDP and Dún Laoghaire-Rathdown Local Authority Climate Action Plan 2024-2029 (LACAP) policies where relevant (3.2.1 and 3.2.2).

#### Recommendation 1:

- Recommends that an objective and / or policy is included in the Draft LAP to support the implementation of CAP24 (and annual revisions thereof).
- Notes approval of the new National Adaptation Framework by the Government on the 5<sup>th</sup> of June 2024.

#### Recommendation 2:



- Recommends that an objective and / or policy is included in the Draft LAP to support the implementation of the new NAF and update the reference of the previous National Climate Change Adaptation Framework (2018) to the new NAF
- Recognises the adoption of the Dún Laoghaire-Rathdown Local Authority Climate Action Plan 2024-2029 (LACAP) in March 2024 and the purpose of the Draft Plan to align with the Government's national climate objective. Outlines relevant legislative context within the Planning and Development Act 2000 (as amended) regarding the inclusion of the LACAP during the preparation of a CDP. Highlights how the Draft LAP can support the implementation of the DLR CDP 2022-2028 objectives for climate action and the DLR County Council LACAP. Emphasises the importance of appropriate reflection in the Draft LAP policies and objectives regarding the DLR County Council LACAP and related actions to ensure consistency and alignment between both plans.
- Welcomes the Council's support of relevant provisions contained in the DLR LACAP (3.2 Policy Context) and the integration and implementation of policies and provisions of the CDP and LACAP.

#### Recommendation 3:

- Recommends that the Draft LAP include additional objectives and / or policies ensuring the implementation of the DLR County Council LACAP and related actions, consistency and alignment between both Plans.
- References the commitment made in the National Development Plan 2021-2023 (NDP) and CAP24 to increase Ireland's proportion of electricity from renewable sources to 80% by 2030 and the execution of this measure will take place through a combination of onshore and offshore renewable sources supported by various support schemes like:
  - the Renewable Electricity Support Scheme (RESS), the Small-Scale Renewable Electricity Support Scheme (SRESS) and the Micro-Generation Support Scheme (MSS)
- Outlines the purpose and intended users for each renewable energy support scheme as well as detailed differentiations between the schemes.
- Highlights the need for the Local Authority to note updates to the national policy context, specifically CAP24 and the Government's renewable electricity generation targets:
  - Solar PV of 8GW by 2030
  - Onshore wind capacity of 9GW by 2030
  - 500MW for community-based projects
  - Increased level for micro and small-scale generation.
- Notes the positive objectives in the DLR CDP 2022-2028 concerning the support and promotion of renewable energy, including Policy Objective CA10, Policy Objective CA12 and Policy Objective 13.
- Notes relevant Policy Objectives relating to energy efficiency and renewable energy contained in the DLR CDP apply to development in the Draft LAP area and have not been duplicated.
- Welcomes the inclusion of policies (including Policy OCLAP63) which generally align with these objectives. Emphasises the importance of all future development seeking to increase contributions to the national renewable electricity generation target and where possible, aim for carbon or energy use neutral developments.

#### Recommendation 4:

- Recommends that the Draft LAP should reference:
  - Shaping Our Electricity Future 1.1, EirGrid's updated roadmap for the development of the transmission grid out to 2030 to deliver on the 80% renewable energy targets.

- o ESB's Networks Strategy: Networks For Net Zero, which sets out ESB Networks' role in enabling the delivery of the Government's Climate Action Plan 2023 and supports the decarbonisation of the electricity system by 2040.
- Provides a description of CAP24 measures supporting the electrification of heating through strengthening existing Building Regulations and the implementation of a National Residential Retrofit Plan. Outlines targets for the National Residential Retrofit Plan and governmental commitment to dwelling retrofitting by 2025 and 20230.
- Notes policy of the Eastern and Midland Regional Assembly (EMRA) Regional Spatial and Economic Strategy (RSES) 2022-2032 and the DLR CDP 2022-2028, which states:
  - o 'Local authorities shall include policies in statutory land use plans to promote high levels of energy conservation, energy efficiency and the use of renewable energy sources in existing buildings, including retro fitting of energy efficiency measures in the existing building stock and energy efficiency in traditional buildings. All new buildings within the Region will be required to achieve the Nearly Zero-Energy Buildings (NZEB) standard in line with the Energy Performance of Buildings Directive (EPBD)'.
  - o 'It is a Policy Objective to support high levels of energy conservation, energy efficiency and the use of renewable energy sources in existing and new buildings, including retro fitting of energy efficiency measures in the existing building stock'.
  - o 'It is a Policy Objective to require the retrofitting and reuse of existing buildings rather than their demolition and reconstruction where possible recognising the embodied energy in existing buildings and thereby reducing the overall embodied energy in construction as set out in the Urban Design Manual (Department of Environment Heritage and Local Government, 2009). (Consistent with RPO 7.40 and 7.41 of the RSES)'.

Recommendation 5:

- Recommends the Local Authority consider including policy to support the National Residential Retrofit Plan, particularly the development of the electrification of heating, having regard to the CAP24, DLR CDP, and the RSES.
- States that during the Draft LAP preparation process the ambition of the National Planning Framework and the RSES should be highly considered given it requires the achievement of compact growth and recognises potential for compact growth to facilitate development of low carbon district heating. Includes examples of district heating policies like:
  - o National Planning Framework: 'District heating networks will be developed, where technically feasible and cost effective, to assist in meeting renewable heat targets and reduce Ireland's GHG emissions.'
  - o Regional Policy Objective 7.38: 'Local authorities shall consider the use of heat mapping to support developments which deliver energy efficiency and the recovery of energy that would otherwise be wasted. A feasibility assessment for district heating in local authority areas shall be carried out and statutory planning documents shall identify local waste heat sources.'
  - o 3.4.2.6 Policy Objective CA15: District Heating: 'It is a Policy Objective to support the development of district heat networks and the utilisation of waste heat recovery in the County as a renewable or low energy resource which can contribute to the transition to a low carbon climate resilient County. The Planning Authority will support the development of a Council wide District Heat policy following on from the forthcoming National Policy Framework for District Heat. (Consistent with RPO 7.38 of the RSES)'.

- Welcomes Draft LAP policy supporting the development of district heating networks and utilisation of waste heat recovery while also understanding potential environmental impacts typically associated with district heating development. Notes and supports the support of the Local Authority regarding the development of district heating networks and the utilisation of waste heat recovery (10.6.3 Renewable Energy).

Recommendation 6:

- Recommends the Local Authority examine the potential of district heating (including from waste heat), commit to carrying out a feasibility exercise (where available and technically feasible) and using heat mapping in support of same in the draft policies, having regard to the DLR CDP, RSES, the NPF and the National Heat Study. Support and encourage similar policies in the Draft LAP.
- Notes the objective of the Local Authority in the DLR CDP 2022-2028, Policy Objective EI11: Resource Management and Policy Objective EI12: Waste Management Infrastructure, Prevention, Reduction, Reuse and Recycling (Circular Economy approach), supporting circular economy principles. References new construction and waste management guidance titled "*Best practice guidelines for the preparation of resource & waste management plans for construction & demolition projects*" published by the Environmental Protection Agency in 2021 and outlines the purpose of these guidelines as well as the informed process taken to determine best practice from design through to construction and deconstruction. Highlights that the implementation of this best practice is consistent with Government policy under the National Waste Management Plan for a Circular Economy 2024-2030 and The Circular Economy Programme 2021-2027 (EPA).

Recommendation 7:

- Recommends the Draft LAP include objectives and / or policies to support circular economy principles and reference the EPA's *Best practice guidelines for the preparation of resource & waste management plans for construction & demolition projects* (2021).
- Advises the Local Authority to consult with their Regional Waste Management Planning Office regarding the development of the Draft LAP, particularly related to policies that may preclude the continued use of existing waste management infrastructure or development of new waste management infrastructure. Requests the Council to consider the targets set out in the SDGs, specifically SDG12 - Responsible Consumption and Production.
- Highlights the importance of facilitating and supporting telecommunications infrastructure development in relation to development of the modern economy. Emphasises National Strategic Objective 6 of the National Development Plan 2021-2023 which states that high-quality, secure, and reliable connectivity to global telecommunications networks is of significant strategic importance to the Irish State. Acknowledges *Harnessing Digital – the Digital Ireland Framework* (Department of the Taoiseach, 2022) and its role in supporting the 5G rollout across all populated areas of Ireland by 2030. Welcomes Draft LAP policy promoting and facilitating the provision of appropriate telecommunications infrastructure at Old Connaught, including broadband, fibre optic connectivity and other technologies (Policy OCLAP64).

Recommendation 8:

- Recommends the Draft LAP include additional objectives and /or policies to support and facilitate the development telecommunications infrastructure in line with Government policy, including the rollout of 5G.

- Encourages the Local Authority to consider the Clean Air Strategy for Ireland while bearing in mind the impacts of measures adopted in the Draft LAP on current and future air quality. Highlights where to find air quality data from the EPA which includes details of the locations of all monitoring stations currently in operation, along with real-time and historic data from each station.
- Concludes with a request for Dún Laoghaire-Rathdown County Council to consider all matters presented in submission for drafting of the Old Connaught Local Area Plan 2025-2031 and notes the availability of department officials for discussion related to matters raised in the submission. Highlights departmental supports for County Councils like:
  - Climate Action, Engagement and Adaptation
  - Energy Generation and Networks
  - Energy Use / Demand in the Built Environment
  - The Circular Economy
  - Communications
  - Environmental Policy and Governance
  - Waste and Natural Resources (including geosciences)
  - UN Agenda 2030 and the Sustainable Development Goals (SDGs).

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapters 3, 7 and 10

<b>DLR Submission No: B0076</b>	<b>Person: Department of Education</b>	<b>Organisation: Department of Education</b>
<b>Summary of Submission / Observation:</b> <ul style="list-style-type: none"> <li>• The submission indicates that the Department have examined the contents of the Draft LAP.</li> <li>• Submission notes the future population trends and the population growth for the area identified in the Draft LAP with reference to the recent dlr County Development Plan 2022-2028.</li> <li>• Submission refers to the future population growth as identified in the Draft LAP in Table 1.3 with a proposed residential yield of 2,400 units, an increase from the dlr County Development Plan 2022-2028, and an assigned projected population of 6,000. Submission also notes should the strategic land reserve be rezoned for residential purposes, a further 1,050 units could see a further 2,625 persons based on an average persons per household of 2.5. Submission notes that is the census 2022 average per household in dlr of 2.71 is used, the potential yield of 3,450 units could see a figure of circa. 9,300+ persons.</li> <li>• Submission refers to the current review of the NPF which has the potential to allocate a further projected population increase that could go beyond these figures.</li> <li>• Submission notes that these figures would see the demand for primary school places increase substantially, which would place significant pressure on existing schools and indicates that in communication with dlr, the Department assessed a potential future requirement for two additional primary schools and a potential future requirement for a post primary school in Old Connaught. They note that these requirements are conditional on the projected population materialising.</li> <li>• The Department note and welcome the reservation of a proposed education site to the south of Allies River Road and a second education site in the northern extents of the Plan area. They note that the second education site is for a potential future primary and post primary school and that is welcomed by the Department. They note that the post primary school will serve Old Connaught and adjacent growth areas including Rathmichael.</li> </ul>		

- Submission indicates that they note the location of the two proposed site reserves and suggest that either location could be used for a future post primary school.
- Refers to Chapter 11 of the Draft LAP and the proposed phasing therein. They indicate that the intention to develop phase A and B, could see the development of 2,400 units and a population growth of 6,500, which could trigger the need for a post primary school site. Reference to phase C which are not currently zoned for residential use.
- Submission requests that all school sites are rezoned to 'Objective SNI.'
- Indicate that all enabling infrastructure required to develop and operate school facilities should be provided in advance of the need for such schools.
- Submission indicates support for objective PI1 - Phasing of Education and encourages engaging with the Department to facilitate the timely delivery of new schools.
- Submission notes and supports Objective SUV1 – Education Facilities.
- Submission notes and welcomes Policy OCLAP8 – Future School Provision.
- Submission notes and supports Objective TM28 – Safe Routes to School.
- Submission indicates special education needs provision at both primary and post primary level will be required throughout the county. Refers to the Department and the National Council for Special Education working together to make increased provision for children with special needs. Indicate that the Department will consult with dlr if and when additional special needs accommodation or sites are required within specific locations. The Department would welcome explicit support within the plan for the provision of school accommodation for children and young people with special educational needs.
- Submission indicates that they are mindful of potential unforeseen circumstances which have the ability to put undue pressure on school place provision which could necessitate reassessments of school place provision from time to time.
- Submission concludes that they welcome the continued engagement with dlr regarded the development of both new and existing schools and emphasises the critical importance of the ongoing work of dlr in ensuring sufficient land is zoned for this purpose.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapters 2, 5 and 11

DLR Submission No: <u>B0077</u>	Person: Department of Housing, Local Government and Heritage	Organisation: Department of Housing, Local Government and Heritage
<p><b>Summary of Submission / Observation:</b></p> <ul style="list-style-type: none"> <li>• The submission welcomes the provisions made in the Draft Plan to conserve biodiversity.</li> <li>• The submission outlines some of the important biodiversity, including Ballyman Glen SAC, in the plan area and notes the inclusion of OCLAP 38 &amp; 39 in the Draft Plan should help ensure the preservation of the biodiversity value of this SAC.</li> <li>• The submission notes that a detailed site-specific assessment shall be required for development proposals situated in the catchment area for GWDTE situated in Ballyman Glen SAC that have the potential to impact groundwater through emissions, abstraction, or changes to hydrogeological/hydrological regimes.</li> <li>• The submission requests that appropriate cognizance shall be had to potential connections and interactions between surface water and groundwater.</li> <li>• The submission welcomes the retention of all GB zoned land in the LAP which shares groundwater catchment with Ballyman Glen SAC. The submission</li> </ul>		

encourages these land uses to remain consistent in the future to preserve the present ground water regime maintaining the QI habitats there.

- The submission notes in the Draft Plan the consideration of LUAS line extension, indicative bus route and road extensions across, or very close to, the downstream end of the Ballyman Glen. The submission notes that such projects could only proceed if any adverse effects on the QI habitats for the Ballyman SAC and the rare plant communities they support can be ruled out.
- The submission also notes that any works in the Fassaroe area risk the disturbance of abandoned dumps, potentially leading to detrimental impacts on the SAC.
- The submission notes the biodiversity importance of the existing tree rows and hedgerows in the Draft LAP area as they form nesting habitats for bird species and bats, and route ways.
- The submission notes that preserving as much as possible of this existing historical tree line and hedgerow network is in the department's opinion likely to be the most viable approach to conserving a significant level of biodiversity within the Draft LAP lands to be developed for residential and other purposes under the auspices of the Draft LAP.
- The submission therefore welcomes GIB7 - Trees and Hedgerows in the Draft LAP.
- The submission notes the Northern Character Area within the Draft Plan area north of the River Allies Road, which under the 2022-2028 CDP was zoned mainly GB 'To protect and enhance the open nature of lands between urban areas' and which it was in addition an objective of the CDP to maintain as a Strategic Land Reserve (SLR) for future housing, is under the Draft LAP now largely to be zoned for residential development, but only to be developed as Phase C of the Draft LAP after other residentially zoned lands to be developed in Phases A and B. It highlights an apparent conflict to the inclusion of a commercial forestry plantation in the Glendoo Mountain to Shanganagh Wildlife Corridor.
- The submission notes that although the biodiversity makeup of these woodlands is likely of limited value, it highlights the potential future importance of the land as a wildlife connection between the lands west of the Draft LAP boundary and the Shanganagh Regional Park.
- The submission consequently recommends that the Planning Authority should consider retaining some of the recently established plantation as plantation, and reducing proportionately in the Draft LAP the land currently proposed to be included in the 'Allies River Road Park' and 'Ferndale Road Park' as depicted in Draft LAP Figure 8.2 Old Connaught Public Open Space Strategy-Strategic Plan Level.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapter 7

<b>DLR Submission No: B0078</b>	<b>Person: Health Service Executive</b>	<b>Organisation: Health Service Executive</b>
<b>Summary of Submission / Observation:</b> <ul style="list-style-type: none"> <li>• Introduces the purpose of the submission to support the Planning Authority's delivery of a draft local area plan for Old Connaught that protects and promotes population health. Notes that the Draft Old Connaught Local Area Plan (the Plan) should fit the vision of the Healthy Ireland Framework. States the submission observations are made with regard to Healthy Ireland and relevant health supporting policies, strategies and plans as well as under chapter headings aligned with the Plan chapter headings.</li> <li>• Highlights a number of assessments referenced to inform the Draft Plan e.g., Strategic Flood Risk Assessment and its purpose in future proofing Old Connaught in the context of climate change and delivering a climate resilient county. Objects to absence of references to a wider Climate Change Risk Assessment that addresses all the climate related risks as well as opportunities for Old Connaught.</li> </ul>		

References a statement in Chapter 1 detailing the opportunity to “deliver a low carbon and climate resilient neighbourhood” which cannot be achieved without assessing threats and opportunities posed by climate change.

**Recommendation 1:**

- Recommends the local area context conduct a wider climate related risk assessment to better inform the Plan e.g., the Climate Change Risk Assessment (CCRA) and / or considerations of climate related events and infectious disease risks.
- Summarises the detailing of the strategic planning framework in Chapter 2 of the Draft Plan. Identified relevant policies and frameworks absent within this chapter like:
  - The Climate Action and Low Carbon Development Act 2015 – 2021.
  - The National Adaptation Framework 2024 “planning for a climate resilient Ireland”.
  - The Healthy Ireland Framework – a framework for improved health and well-being.
  - Delivering on the Sustainable Development Goals by 2030.
  - The World Health Organisation (WHO) “Health in All Policies” approach.

**Recommendation 2:**

- Recommends an enhanced strategic planning framework including the policies and frameworks listed above incorporated into the final plan to indicate aspects of the plan that will better deliver health protection and health gain.
- Provides a description of climate change as outlined by the World Health Organisation (WHO). Highlights the policy context in Chapter Three, the need to update sections regarding the National Adaptation Framework and the lack of reference to the Climate Action and Low Carbon Development Act 2015 -2021. Summarises the reiteration of the goal of climate policy regarding development in Old Connaught and highlights Figure 3.1 for detailing mitigation and adaptation actions including overlap between the two. Notes that the figure identifies adaptation actions like Disaster Management and Risk Reduction which signals the need to assess; manage risks to prevent, mitigate, prepare for, and respond to climate related disasters and build back safer and stronger during recovery phase of the Emergency Management Cycle. References DLR Draft Climate Action Plan 2024 – 2029 graphic outlining approach to Major Emergency Management. Highlights inclusion of Table 3.1 outlining the intent of the Draft Plan to contribute to climate change adaptation or mitigation.
- Notes the emphasis on “healthy placemaking” in Chapter 4 but requires clarification regarding the definition of a healthy place and metrics utilised to assess the health of Old Connaught currently and in the future during the period of the LAP.
- Notes the proposal of the plan to “embrace the Avoid-Shift-Improve approach from moving cars to moving people” under Chapter 6 which presents an opportunity for the Planning Authority to measure health impact via improvements in local air quality and changes to the noise environment as indicators of the change sought.
- Notes that Chapter 8 states the plan “supports open spaces, incorporating ecosystem services, climate change measures, green infrastructure etc” and requires clarification regarding the detail of climate change measures. Submission is of the opinion that ‘climate change measures’ includes mitigation and adaptation practices which presents the opportunity for the Planning Authority to deliver health gain or a health co-benefit.
- Notes the focus of Chapter 10 and the provision of attenuation ponds in the plan but requires clarification on the categorisation of attenuation ponds under overarching climate change measures and the purpose of the ponds. Commends the intention to support renewable energy including PV in appropriate locations as

localised mitigation action as well as reference to bring centres to support waste management in the Plan. Raises issue with the lack of encapsulation of full range of waste management actions addressed under waste hierarchy. Emphasises the need to first prevent waste generation and suggests supporting the right to repair as an additional action to include regarding achieving circular economy ambitions. Recommends including health related data (e.g. air quality, noise, access to green spaces, active travel journeys taken) in Chapter 12 which monitors the effectiveness of the Plan. Suggests including an assessment of potential "maladaptation" in the context of climate change and in terms of impact to ensure capturing intended positive impacts and potential unintended impacts of the Plan.

- Provides a description of key references discussed in Chapter 5. Requires clarification regarding the inclusion of "Resilient Facilities" within references to Universal Design and offers the varied aspects included in the definition of resilience. Enquires about the inclusion of an Early Warning System for Old Connaught residents and visitors.

#### Recommendation 3:

- Recommends an assessment of the "Sustainable Urban Village" from the perspective of structural resilience and adaptability to sudden onset and/or slow onset events and potential displacement of people within the area or into the area to support climate resilient community-based policies for Old Connaught.
- Highlights the detail of the Avoid – Shift – Improve approach in Chapter 6 in order to reduce congestion, reduce GHG emissions and create more liveable cities. Notes the chapter's focus on infrastructure provisions supportive of active travel and public transport options. Cites concerns regarding a lack of understanding influences necessary to encourage desired modal shift and enquires about the inclusion of bike libraries as a part of the solution. Notes a reference to remote parking and vehicle restriction areas and questions how this will impact individuals investing in an EV or e-bike and their ability to charge their modes of transport.

#### Recommendation 4:

- Recommends a balanced approach to behaviour change in this area to ensure investment in infrastructure aligns with an understanding of factors that influence behaviour in the area, noting that some proposed solutions can have unintended and/or negative consequences.
- Notes the definition of green infrastructure given in Chapter 7 and recommends that this part of the plan take a ONE Health view, by examining the intersection between the environment, human health, and animal health. States that the rationale for this recommendation is to ensure habitats and biodiversity objectives do not create potentially harmful conditions to human health e.g., environments that support tick borne or mosquito borne infections.
- Notes the recognition of the important role open space, parks and recreation within Chapter 8 as it relates to health, well-being and quality of life. Also notes the need for multifunctional planning with ecosystem service, climate change measures and green infrastructure underscored as important.
- Acknowledges policy objective to support structured and unstructured play areas.
- Emphasises the important role climate change measures should have on informing the themes of this chapter and provides an example climate change measure relevant to open space, parks and recreation.
- Notes the specific areas covered within Chapter 10 such as:
  - Water infrastructure
  - Wastewater infrastructure
  - Drainage infrastructure
  - Flood Risk Management



<ul style="list-style-type: none"> <li>o Energy</li> <li>o ICT Communications</li> <li>o Waste Management</li> </ul> <ul style="list-style-type: none"> <li>• Highlights the importance of SuDs implementation as it relates to water, wastewater and drainage given it manages the increase in surface water runoff and notes the two attenuation ponds planned for the area referenced in the Draft LAP and their purpose. Enquires about the interpretation of amenity including the use of water to help reduce dependence on treated water for non-drinking uses and as a means to adapt to potential drier conditions as our climate changes.</li> <li>• Notes the importance of Flood Risk Management as a key climate change adaptation measure. Commends the chapter's focus on the prevention of flood events and mitigating the effect of floods when they do occur. Highlights the absence of aspects of preparedness, response and recovery elements of the Emergency Management Cycle.</li> <li>• Acknowledges the reference to the incorporation of renewable energy within the energy section of Chapter 10 specifically solar energy development but notes a lack of reference to wind and battery energy storage systems which could help to build the desired climate resilient neighbourhood.</li> <li>• Notes the theme of the final section of Chapter 10 (waste management) and provides a definition for the theme. Recognises the emphasis on bring centres to support best practices for waste management. Recommends expanding area to include supports regarding the right to repair, zero waste shops, enhanced segregation of waste and other mechanisms limiting waste generation and adhering to the waste hierarchy.</li> <li>• Reviews the monitoring and evaluation chapter and provides an illustration of the five strategic outcomes included in Chapter 12. Highlights the relevant public health outcomes: Creation of the climate resilient county and an inclusive and healthy county. Recommends the M&amp;E framework capture data indicative of progress in these areas and that the indicators evaluated are SMART indicators e.g. resilient county reference that could assess the effectiveness of Disaster Management and Risk Reduction for all known hazard and climate change adaptation. Includes contextual examples relevant to a healthy county like water quality, air quality and noise pollution indicators. Provides an example of a technical document that highlights resilience in an EU context and offers guidance on climate-proofing infrastructure.</li> </ul>
<p><b>Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):</b></p> <p>Chapters 3, 6, 7, 8, 10 and 12</p>

<b>DLR Submission No: B0079</b>	<b>Person: Eileen Connolly</b>	<b>Organisation:</b>
<p><b>Summary of Submission / Observation:</b></p> <ul style="list-style-type: none"> <li>• Requests that building vehicle access be implemented first and enquires about its location.</li> <li>• Requests the implementation of speed restrictions for certain vehicles.</li> <li>• Requests the retention and protection of the Walled Gardens being leased by Festina Lente.</li> <li>• Notes the emphasis on the retention and respect of the integrity of the wider Old Connaught area during the public information 'Drop in' days. Highlights their property on Old Connaught Avenue and notes a huge increase in construction traffic on the avenue which have little to no regard for 50K speed limit as well as dust spewing on dwellings enroute.</li> <li>• Suggests that for future Information Days drone footage of development be made available on screens. Recommends a 'walk through' of the outskirts to give residents an idea of what the development will entail.</li> </ul>		

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapters 1, 6, 9 and Other Issues

**DLR Submission  
No: B0080**

**Person: Robert & Claire  
McGarry**

**Organisation:**

**Summary of Submission / Observation:**

- Submission is on behalf of residents at Coolnaskerry, Old Connaught Avenue.

Grounds of Submission:

- Submission indicates the main grounds of the submission as follows.
- The submission notes concern regarding an absence of policy protections in the Draft Plan to protect existing residents from the negative impacts of construction and infrastructure delivery around their homes.
- The submission criticises the proposed delivery of five-storey apartment blocks in in Phase A: Sub-Phase 1. It notes that the delivery of such on Council lands opposite their home is unfair, unreasonable, and out of context with the character of the area. It suggests that given a lack of clarity over public transport delivery in the area, such density should be located closer to the village centre, and such development is out of character along Old Connaught Avenue.
- The submission notes concern over the total volume of housing, in particular social and affordable housing, proposed by the Draft Plan without adequate provisions for supporting services, facilities, public transport and infrastructure. It notes concern over the phasing of that which is proposed, and notes this as a planning failure similar to those seen in west Dublin.
- Request that the Planning Authority make these basic, common-sense changes to the Draft LAP, to ensure the reasonable protection of residents ahead of future applications.

Infrastructure Proposals:

- The submission illustrates the location of the property and notes the infrastructure planned in its vicinity.
  - to the north: Road improvements, Bus Gate, and Luas Green Line Extension;
  - to the south: Electricity Strategic Infrastructure extension;
  - to the east: M11 Motorway Improvement Scheme Junction 5 slip road, and;
  - to the west: New Road and Luas Green Line Extension.
- It states that the absence of resident protection policies in the Draft Plan is a failure of the Planning Authority and State Agencies to balance the interests of future stakeholders against those of the existing and would place a wholly unfair and disproportionate burden on existing homeowners.
- The submission notes that other properties in the area have been afforded protective policies in the form of quiet street proposals and park provisions, yet such an approach has not been implemented for their property.
- The submission notes that such policy protections are required to mitigate the impact of the very significant increase in car traffic that will accompany the proposed residential development ahead of the delivery of the proposed transportation improvements,
- The submission requests an extension of "Objective F" zoned lands northwards and/or westwards to provide a buffer between their property and proposed infrastructure delivery.
- The submission also requests a Specific Local Objective (SLO) designation in the Draft Plan for the property to provide for buffer planting and noise screening to mitigate negative impacts of proposed transportation. The submission provides an example SLO that achieves such.

- The submission requests information on road, footpath, bus and Luas layouts, including details of proposed arrangements for traffic movements in the area, including local access for existing residents. Submission also requests details of proposed noise mitigation, Luas and bus stops.
- In relation to bus services and bus gate, the submission indicates that minimal information has been provided on the operation or commencement date or ability to access the planned village centre or Bray.
- The submission draws attention to submissions already made by Bray Emmet's GAA club and the Old Connaught Resident's Association regarding concerns over the proposed Bus Gate.
- The submission requests details as to how the bus gate will operate and affect existing local residents, including the nature of any change to or restrictions on local traffic, and confirmation of when the Bus Gate is to commence operation.
- The submission notes the need for infrastructure investment in the area, but requests consideration for the cumulative effects of being at a confluent point of infrastructure delivery.
- The submission notes the possible negative impacts of LUAS provision in proximity to their property and requests details of the layout of both Luas tracks, the location of Luas stops, and proposals for visual and noise screening and other mitigation for dwellings affected.
- The submission notes a lack of information in the Draft Plan regarding how the M11/N11 Improvement Scheme will be integrated into the Draft LAP, despite its suspended status.
- The submission notes dlr's responsibilities in integrating TII/NTA schemes with the Draft Plan. It requests that the LAP incorporate noise mitigation immediately east of the Bray Emmets GAA Club access road to insulate residents from increased noise arising from the Motorway and Junction 5 slip road.
- The submission notes existing electrical infrastructure adjacent to their home and proposed expansions of such in the vicinity. It requests that ESB/EirGrid respond through the Draft LAP process as to whether noise and visual impact mitigation can be provided for the planned ESB/EirGrid infrastructure upgrades adjacent to their home. Alternatively, it requests that the local authority incorporate policies that require screening for noise/transformer hum and visual impact, and to address in writing the safety issues that arise for the occupants of 'Coolnaskerry' as a result of the planned ESB/Eirgrid infrastructure in the LAP area.
- Concluding observations on infrastructure in the Draft Plan, the submission states that the local authority have lost sight of protecting existing residents during development due to the pressures of a housing crisis, specifically in relation to the confluence of proposed infrastructure that will surround their home.

#### Height & Density of Phase A (Sub-Phase 1) Apartment Development:

- The submission notes that designating any areas as high density in Phase A is premature without knowing the location of future Luas stops and bus routes.
- Submission considers that the most dense and tall development should be located adjacent the Village Centre of the new Sustainable Settlement, and secondarily adjacent proposed Luas stops once they are known.
- Regarding the identified Council owned land on Old Connaught Avenue, the submission requests a required change to the Draft LAP, that a more gradual approach to density be taken from existing homes. It notes this would restrict the council site to a maximum three storey development, achieving densities of 60 dph. It also notes that the remaining blocks be set back 30m from Old Connaught Avenue and the proposed Luas corridor for noise mitigation and protection of residential amenity.
- The submission notes that all proposed development along Old Connaught Avenue should integrate into the sensitive character area of Old Connaught and draws

attention to the relevant content of the submission made by Bray Emmets and the Old Connaught Resident's Association.

- The submission requests a response from the Planning Authority through the Draft LAP public consultation, as to why the highest density and height development is proposed on the County Council's own lands and not adjacent the proposed Village Centre.
- The submission also requests the Planning Authority to respond regarding how the location of the higher densities was determined when the location of Luas stops and bus routes is not known.

#### Phasing, Services & Facilities

- The submission outlines an estimate of a proposed number of social and affordable housing in the Draft LAP as a quantum of the overall housing provision.
- The submission highlights the significant provision of social and affordable housing in other areas of South County Dublin, which will come online together with this Draft LAP area.
- The submission notes concern regarding the delivery of housing, in particular Social & Affordable Housing, in the absence of relevant supporting infrastructure, services and facilities. It notes there is no obligation in the Draft Plan to provide public transport, facilities or schools alongside housing and that services are not planned in the area until Phase B has already commenced. It notes this will cause new residents to have to travel to Bray and further for daily needs.
- The submission therefore requests that the phasing of required primary and secondary schools is set out in the Draft LAP Phasing and Implementation Chapter and include a requirement for schools to be under construction prior to the commencement of the corresponding housing.
- The submission requests that no housing construction, including social & affordable housing construction, in the Draft LAP area will be commenced until the Neighbourhood Centre facilities and services have commenced construction. It is requested that the Neighbourhood Centre be scheduled for Phase A: Sub-Phase 1 and not Phase B. The submission includes a related text change for the phasing table in Chapter 11 of the Draft LAP.
- The submission notes the quantum of social and affordable housing units which will be permitted under Phase A of the Draft Plan. It notes these units can be built without any facilities, services or schools within the Draft LAP area. It further notes that no requirement exists in the Draft Plan for the provision of a Luas or bus service before the completion of all proposed units across the three development phases, to provide for a future population of approximately 8,640 to 9,315 people (3,200-3,450 homes). It states this will be problematic regarding transportation in the area.
- The submission notes the inclusion of the phrasing "potential" in the Draft Plan in relation to Luas provision. As a result, it highlights the importance of quality bus provision to cater for the future population.
- The submission requests that no new houses in the Draft LAP area be occupied in any phase until bus services and bus gates are operational.
- The submission summarises the infrastructure phasing in relation to housing delivery in the Draft Plan. It then notes a lack of progression and available detail on infrastructure such as electricity, sewerage, Luas, buses and schools.
- The submission questions the validity of progressing development, or even an LAP, in the area in the absence of such progression and information. It requests that the Planning Authority address if the adoption of the Draft LAP is premature on the grounds of the extent of essential infrastructure which is not in place, and which has no confirmed timeframe, funding or plans for delivery, including water and transport infrastructure.

Further Matters

- The submission notes that the Draft Plan contains minimal information on the effects of cumulative noise and vibrations from converging infrastructure on their property and adjacent properties.
- The submission requests that the Draft LAP incorporates appropriate noise mitigation policies for current and future residents in the local area. Also to include policies in the Draft Plan requiring applicants to carry out noise and vibration assessments for infrastructure development, and to require appropriate mitigation as part of development proposals.
- The submission also requests the publication of modelling of expected cumulative noise impacts on residents arising from planned development in and around the Draft LAP area.
- The submission requests details of the expected sequencing of infrastructure construction projects relative to each other, and high-level construction and construction traffic management proposals.
- The submission notes no reference to social cohesion, crime and anti-social behaviour in the Draft Plan, nor any mention of engagement with An Garda Síochána Community Engagement or Crime Prevention Officers.
- The submission therefore requests the Planning Authority to state how design principles to inhibit crime, anti-social behaviour, and promote social cohesion in the built environment have been incorporated in the Draft Plan. The submission also requests that the Draft LAP incorporate policies requiring design measures in the built environment to inhibit crime and antisocial behaviour and promote social cohesion in all planning applications in the area.
- The submission notes a potential conflict between the proposed interventions around their property and areas marked in the County Development Plan to "To protect and preserve Trees and Woodlands."
- The submission requests that a specific local objective be provided so that a green buffer zone will be provided along the M11 Junction 5 slip road, to be extensively planted with trees and shrubs and will incorporate appropriate noise mitigation.
- The submission notes concern regarding a lack of detail in the flood prevention proposals and objectives around their property. It notes risks of overflow from existing and proposed infrastructure and cites potential flooding issues deriving from future transport infrastructure.
- The submission therefore requests information that the multiple separate pieces of transport infrastructure planned for the area will not negatively impact the proposed Draft LAP flood risk management proposals in the vicinity of Old Connaught Avenue. The submission also requests clarification that the phasing plan in the Draft Plan has had proper regard to the flood risk management plan, or whether it is the intention that the entire flood risk management plan to be delivered in Phase 1.
- The submission concludes with a summary of requests for a list of required changes to the Draft LAP provided under the following headings,
  - Policy Protections for Existing Residents
  - Reduce Scale of Phase 1 Sub-Phase 1 blocks
  - Require Provision of Services, Facilities & Public Transport alongside housing
  - Further Matters
- The submission asks for compliance with these requests and notes the reasonable nature of their content.

**Response and Recommendation to issues are located in Volume I, Part 3 under the following heading(s):**

Chapters 4, 5, 6, 10, 11, Appendix 1 and Other Issues

**Part 2: List of persons who made a submission / observation.**

<b>Submission No.</b>	<b>Name</b>	<b>Organisation</b>
<b><u>B0001</u></b>	Gas Networks Ireland	Gas Networks Ireland
<b><u>B0002</u></b>	Environmental Protection Agency (EPA)	Environmental Protection Agency (EPA)
<b><u>B0003</u></b>	Alan & Maureen Grainger	
<b><u>B0004</u></b>	Kieran Ross	
<b><u>B0005</u></b>	Adrian and Aisling Buckley	
<b><u>B0006</u></b>	John O'Neill	
<b><u>B0007</u></b>	David and Paul Butler	
<b><u>B0008</u></b>	William Maher	
<b><u>B0009</u></b>	Anna Keogh	
<b><u>B0010</u></b>	Johana Ferriere	
<b><u>B0011</u></b>	Pamela McCormack	
<b><u>B0012</u></b>	George Reddin	
<b><u>B0013</u></b>	Ms. SJ Knight	
<b><u>B0014</u></b>	Ann Tierney	
<b><u>B0015</u></b>	Tara Burns and Patrick Casey	
<b><u>B0016</u></b>	Al O'Tuathaigh	
<b><u>B0017</u></b>	Matthew Carty	
<b><u>B0018</u></b>	Transport Infrastructure Ireland (TII)	Transport Infrastructure Ireland (TII)
<b><u>B0019</u></b>	Katie O'Brien & Ray Stevenson	
<b><u>B0020</u></b>	Brid Meehan	Old Connaught and District Residents Association
<b><u>B0021</u></b>	Irene O'Mara	Old Connaught and District Residents Association
<b><u>B0022</u></b>	Pat O'Loughlin	
<b><u>B0023</u></b>	Paula Byrne	
<b><u>B0024</u></b>	Rory Barry	
<b><u>B0025</u></b>	Adrianne Matthews	
<b><u>B0026</u></b>	Greta Egan	
<b><u>B0027</u></b>	Stuart McCabe	
<b><u>B0028</u></b>	Bríd O'Donnell	
<b><u>B0029</u></b>	Martin Crowe	
<b><u>B0030</u></b>	Old Connaught House Management Company	Old Connaught House Management Company
<b><u>B0031</u></b>	Anna Pierce	
<b><u>B0032</u></b>	ESB	ESB
<b><u>B0033</u></b>	St. Gerard's School	St. Gerard's School
<b><u>B0034</u></b>	Eleanor Bourke	
<b><u>B0035</u></b>	Bray Emmets GAA Club	Bray Emmets GAA Club
<b><u>B0036</u></b>	Marie O'Donnell	

<b><u>B0037</u></b>	Mary McNamara	
<b><u>B0038</u></b>	Noreen Keane	
<b><u>B0039</u></b>	Philip O'Donnell	
<b><u>B0040</u></b>	Lauren Tuite	Dún Laoghaire Rathdown County Council
<b><u>B0041</u></b>	No Name Given	
<b><u>B0042</u></b>	Ivo Lemahieu	
<b><u>B0043</u></b>	Office of Public Works Flood Risk Management (OPW)	Office of Public Works Flood Risk Management (OPW)
<b><u>B0044</u></b>	Eastern and Midland Regional Assembly (EMRA)	Eastern and Midland Regional Assembly (EMRA)
<b><u>B0045</u></b>	Ferndale Court Volunteer Board of Directors	Ferndale Court Volunteer Board of Directors
<b><u>B0046</u></b>	Joseph Breslin	
<b><u>B0047</u></b>	Uisce Eireann	Uisce Eireann
<b><u>B0048</u></b>	Cedric Uhlar	
<b><u>B0049</u></b>	Anne Healy	
<b><u>B0050</u></b>	Ballymore Group	Ballymore Group
<b><u>B0051</u></b>	D Healy	
<b><u>B0052</u></b>	Mr. and Mrs. Terry & Fiona O' Neill	
<b><u>B0053</u></b>	Office of the Planning Regulator (OPR)	Office of the Planning Regulator (OPR)
<b><u>B0054</u></b>	Dr. Theo and Dr. Sasha Murphy	
<b><u>B0055</u></b>	Old Conna Golf Club	Old Conna Golf Club
<b><u>B0056</u></b>	Philip O'Donnell	
<b><u>B0057</u></b>	Old Connaught and District Community Association	Old Connaught and District Community Association
<b><u>B0058</u></b>	Rob Goodbody	
<b><u>B0059</u></b>	National Transport Authority (NTA)	National Transport Authority (NTA)
<b><u>B0060</u></b>	Castlethorn	Castlethorn
<b><u>B0061</u></b>	Adam Connors	
<b><u>B0062</u></b>	Rory Breslin	
<b><u>B0063</u></b>	Laura Olson	
<b><u>B0064</u></b>	Glenveagh Homes Ltd.	Glenveagh Homes Ltd.
<b><u>B0065</u></b>	Woodbrook College	Woodbrook College
<b><u>B0066</u></b>	Kieran Ward	
<b><u>B0067</u></b>	William Somerville-Large	Committee member, Old Connaught Residents' Association
<b><u>B0068</u></b>	Seamus Deane	
<b><u>B0069</u></b>	Anne	
<b><u>B0070</u></b>	Karin Petrie	
<b><u>B0071</u></b>	Claire Miller	
<b><u>B0072</u></b>	John Coveney	
<b><u>B0073</u></b>	Alan & Mary Kennedy	
<b><u>B0074</u></b>	Christopher & Lily Byrne	



<b><u>B0075</u></b>	Department of the Environment, Climate and Communications	Department of the Environment, Climate and Communications
<b><u>B0076</u></b>	Department of Education	Department of Education
<b><u>B0077</u></b>	Department of Housing, Local Government and Heritage	Department of Housing, Local Government and Heritage
<b><u>B0078</u></b>	Health Service Executive	Health Service Executive
<b><u>B0079</u></b>	Eileen Connolly	
<b><u>B0080</u></b>	Robert & Claire McGarry	