

SANDYFORD

Urban Framework PlanPROPOSED VARIATION NO. 2

Dún Laoghaire-Rathdown County Development Plan 2010-2016

MANAGER'S REPORT





DÚN LAOGHAIRE-RATHDOWN COUNTY DEVELOPMENT PLAN 2010-2016

<u>Variation No.2</u> <u>Sandyford Urban Framework Plan</u>

MANAGER'S REPORT

March 2011

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PART 1

INTRODUCTION

Introduction

Statutory Background to the Manager's Report

This Manager's Report has been prepared in accordance with the provision of Section 13(4) of the Planning and Development Acts, 2000-2010 and sets out the following:

b)

- (i) A list of the persons or bodies who made submissions or observations (i.e. during the public consultation period of the Proposed Variation No.2 to the County Development Plan 2010-2016 and the Environmental Report),
- (ii) Summarises the following from the submissions or observations made under this section:
 - (I) Issues raised by the Minister, and
 - (II) Thereafter, issues raised by other bodies or persons,
- (iii) Gives the response of the Manager to the issues raised, the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area and taking account of any relevant policies or objectives for the time being of the Government or of any Minister of the Government.

In the case of each Planning Authority within the GDA, a report under Section 13(4) of the 2000 Act paragraph (a) shall summarise the issues raised and the recommendation made by the NTA (DTA) in its written submission prepared in accordance with section 31D and outline the recommendations of the Manager in relation to the manner in which those issues and recommendations should be addressed in the proposed variation.

A report under paragraph Section 13(4) (a) shall summarise the issues raised and recommendations made by the relevant regional authority in its written submission prepared in accordance with section 27C and outline the recommendations of the Manager in relation to the manner in which those issues and recommendations should be addressed in the development plan.

This report is submitted to the Members of Dún Laoghaire-Rathdown County Council for their consideration as part of the process for the consideration of

proposed Variation No.2 to the County Development Plan 2010-2016. Members have a period of up to 6 weeks from the date of receipt to consider the Manager's Report. Following consideration of proposed Variation No.2 and the Manager's Report, the Members may, by resolution accept or amend the proposed Variation. If the Members decide to materially amend the proposed Variation, a further period of public consultation will be necessary.

Strategic Environmental Assessment (SEA)

An Environmental Report accompanies Variation No.2 to the County Development Plan 2010-2016. The Environmental Report contains a detailed analysis of the Sandyford Urban Framework and how the implementation of the Plan would impact on its receiving environment. The Manager's recommendations as set out in this report have been assessed to determine whether they would have any significant impact on the environment. It was considered that the amendments proposed in this Manager's Report would not have any significant adverse effect on the environment. If, however, the Planning Authority engages in a further round of public consultation for proposed material amendments to Variation No.2 of the County Development Plan, the public notice must additionally state that information on the likely significant effects on the environment of implementing the proposed amendment(s) will also be available for inspection and that a submission or observation in relation to such information made to the Planning Authority will also be taken into consideration before the making of any amendment.

Contents & Format of This Report

Having regard to the provisions of the Planning and Development (Amendment) Act 2010, Part 2 of this Manager's Report sets out a summary of the submission made by the Minister for the Environment, Heritage and Local Government, the National Roads Authority and the regional authority, the Manager's response to the issues raised and a recommendation in relation to each issue/observation.

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

In order to make the document as user friendly as possible the issues raised have been grouped under a series of umbrella 'headings' which are largely based on the various individual Sections and Appendices set out in the Sandyford Urban Framework Plan and the accompanying documents of Variation No.2 e.g. Section 3.2 Building Height.

Part 4 summarises submissions made in relation to the Environmental Report, the Manager's response to these issues and a subsequent recommendation.

Public Consultation

Variation No.2 to the County Development Plan 2010-2016, including: The Sandyford Urban Framework Plan; The Amendments to The County Development Plan: the Environmental Report: the Appendices to the Environmental Report and the Draft Appropriate Assessment, were put on public display on Monday 10th January 2011. In addition, a series of Background Working Papers prepared by the Council, were also available for public viewing on the Council's website. Written submissions and/or observations were invited for a 4 week period ending Monday 7th February 2011. During this public consultation period the Council pursued a proactive approach in an attempt to raise awareness of proposed Variation No.2 of the Development Plan among the citizens of the County and other stakeholders, and by doing so encouraged a greater degree of public participation in the overall process. The initiatives and measures undertaken by the Council to engage with the citizens of the County and promote more inclusive public participation included a public information day on 25th January 2010 and additional presentations to stakeholders (SEBEA/SDA) where the SUFP team gave detailed Powerpoint presentations and took part in structured Q&A sessions.

- Detailed public notices placed in the Irish Times and Irish Independent on 10th January 2010 advising of the consultation period, where the Variation to the Development Plan could be accessed and inviting submissions up to and including the closing date of 7th February 2011.
- The proposed Variation to the County Development Plan was on continuous public display for the duration of the consultation period at the following locations:
 - The Concourse, County Hall, Dún Laoghaire (9.00am-5.00pm)
 - Council Offices, Dundrum Office Park (9.30am-12.30pm and 1.30pm-4.30pm)
- The proposed Variation to the Development Plan was available to view or download from the Council's website, www.dlrcoco.ie and made available at libraries in Blackrock, Cabinteely, Dalkey, Deansgrange, Dún Laoghaire HQ, Dundrum, Glencullen, Sallynoggin, Shankill and Stillorgan, both in hard copy and through the free web access facilities available at each library (The Background Working Papers were available for public viewing on the Council's website).
- Submissions/observations in respect of the proposed Variation to the County Development Plant were accommodated through a number of mediums – hard copy, e-mail and through the Development Plan website.

Submissions Received

The County Manager would like to take this opportunity to thank everyone who took the time to make a submission to Variation No. 2 to the County Development Plan 2010-2016, and to particularly thank those who attended the public information sessions.

During the 4-week consultation period a total of 77 no. submissions were received by the Planning Authority.

Part 5 of the Manager's Report lists those individuals/agencies/groups making submissions, lists the subject site (if appropriate) and summarises the issue(s) raised in the submission. Each submission has been allocated a unique reference number. The information in Part 5 has been set out in two different formats:

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

PART 2

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

Submission by Minister for Environment, Heritage and Local Government Submission No. V2004

Key 1	Issue	Sub. No.	•	Manager's Response & Recommendation			
Gener	al Issues						
(i)	The Council is to be commended for bringing forward an Urban Framework Plan, which realistically addresses the infrastructural and environmental constraints governing the future development of Sandyford Business Estates. The SUFP provides a sustainable, plan led policy framework.	V2004		Recommendation No change to Variation No.2:SUFP			
4.2 Mu	ulti Modal Transport Infrastructure						
(i)	The Modal split objectives linked to Smarter Travel are strongly supported.	V2004		Noted			
				Recommendation			
				No change to Variation No.2:SUFP			
SEA: E	invironmental						
(i)	The SUFP contains satisfactory objectives and targets for the protection of	V2004		Noted			
	archaeological heritage.			Recommendation			
				No change to Variation No.2:SUFP			

Submission by National Transport Authority Submission Number V2054

Key 1	issue	Sub. No.	Map No.	Manager's Response & Recommendation
(i)	Smarter travels targets are set for 2020 and not for 2016. Different targets should be set for different parts of the Sandyford Business District. New development in Sandyford Business District should aim for targets well in excess of Smarter Travel Targets for future development in the area.	V2054		Comment noted. Smarter Travel aims for higher targets to be achieved in Urban Areas by 2020. The period for the SUFP is up to 2016. Targets will be monitored as part of the Mobility Management Plan on an ongoing basis and updated if necessary. The majority of the Sandyford Business District is within walking and cycle distance of a Luas Station or Bus Stop Recommendation No Change to Objective TAM1 in the SUFP
(ii)	The NTA welcomes the proposal for the preparation of an area wide Mobility Management Plan which can assist in achieving sustainable transport objectives. The inclusion of a provision to prepare this plan in consultation with the NTA is requested.	V2054		Details to be included in the Mobility Management Plan. Recommendation Text for Objective TAM 9 to be amended as follows: 'It is an objective of the Council to prepare an area wide mobility management plan for Sandyford Business District in conjunction with stakeholders in the area and in consultation with the National Transport Authority.
(iii)	The NTA recommend an area based approach to car parking standards for the entire Sandyford Business District and recommends that the maximum car parking standards for the area should not exceed the DLR County Development Plan 2010-2016 car parking standards for designated areas along	V2054		The current car parking standards were adopted in April 2010 as part of the County Development Plan 2010-2016. In the current County Development Plan car parking standards have been changed from minimum to maximum parking standards. In addition, separate car parking standards are included for development along public transport corridors. In formulating the standards, reference was made to other car parking standards in the Greater Dublin Area and to UK best practice. In addition, the car parking standards also required the provision of spaces for charging of electric vehicles (e.g. 10% office) and 4% for disabled persons. There is scope existing within the County Development Plan to reduce car-parking quantum for any development. Recommendation The following changes to Variation No.2: SUFP. Additional Car Parking Objective to be included, after TAM 17 "It is an objective of the Council that the maximum car parking standards for the entire Sandyford Business

	public transport corridors. This will help control congestion in the local and wider environs and encourage access by non- car modes.		District will not exceed the Dún Laoghaire Rathdown County Development Plan 2010-2016 car parking standards for designated areas along public transport corridors and more restrictive standards may apply at appropriate locations".
(iv)	The NTA recommends that an additional qualifier should be included in the text of objectives P3 and P4 to ensure that these road proposals will be consistent with the Draft Transport Strategy for the Greater Dublin Area	V2054	Recommendation The following changes to Variation No.2: SUFP. Additional text to Objective P3 Prior to implementation of these road schemes, that consultation and review will be carried out with the National Transport Authority based on their adopted Transport Strategy for the Greater Dublin Area. Additional text to Objective P4 Prior to implementation of these road schemes, that consultation and review will be carried out with the National Transport Authority based on their adopted Transport Strategy for the Greater Dublin Area.

Submission made by Regional Authority None

PART 3

SUMMARY OF SUBMISSIONS AND MANAGER'S RESPONSE AND RECOMMENDATIONS

Summary of Submissions and Manager's Response and Recommendations

Part 3 of the Manager's Report summarises the issues raised in the 77 no. submissions and gives the Manager's response and recommendation to each. The response takes into account the proper planning and sustainable development of the area, any statutory obligations of the Local Authority and any relevant Government policies as required under Section 13(4)(b) of the Planning and Development Acts 2000-2010.

The various issues raised have been grouped or assimilated into a number of 'umbrella' categories which largely correlate and cross-refer to the various Sections of proposed Variation No.2 to the County Development Plan, as follows:

Sandyford Urban Framework Plan

- 1. Introduction
- 2. Future Land Uses
- 3. Urban Form, Public Realm, Linkages and Building Height
- 4. Infrastructure
- 5. Phasing and Funding

Appendix 1 Land Use Zoning Objectives Appendix 2 Specific Local Objectives

Part 4 summarises the submissions and issues in relation to the Strategic Environmental Assessment (SEA): Environmental Report.

Part 5 of the Report lists every individual, group, agency and agent/consultant (acting on behalf of third parties) who made a submission. Each submission is given a unique reference number and the number is used throughout the Manager's Report to identify the submission. (For ease of convenience Part 5 lists the submissions both in alphabetical order and number order).

Where the Manager's Recommendation proposes 'No change to Variation No.2' the recommendation is printed in Black type. Where the Manager's Recommendation proposes an amendment to proposed Variation No.2 the recommended amendment is printed in Red type.

Where issues are site specific or have a spatial context the relevant Map Number(s) is shown. Where the issue is general and/or policy based no Map Numbers are shown.

Key	Issue	Sub. No.	Map No.	Manager's Response & Recommendation
	TON 1. CODUCTION	1101	1101	
Gener	al Issues			
(i) (ii)	Welcomes the Plan in principle, recognises the need for a cohesive plan and objectives to use urban planning to influence future development. The Plan gives structure to an area previously without a significant planning direction and especially the mixed land use objectives and high density closer to Luas stops, demonstrating best practice in integration of land use and transportation planning. There is much merit in this plan for	V2072 V2073 V2037 V2040 V2048 V2052 V2009 V2022 V2020 V2028 V2017 V2029 V2030 V2031 V2034 V2016		Recommendation No change to Variation No.2: SUFP
(iv)	residents. The draft SUFP fails	V2069		The Draft Sandyford Urban Framework Plan 2007 was never adopted by the Councillors nor approved by Management of Dun
(,	to directly address the main unique problems in Sandyford and is too generic. SUFP must recognise challenges			Laoghaire Rathdown County Council and as such does not have a statutory basis. The Draft 2007 Sandyford Urban Framework Plan promoted mixed use high density development throughout SBD including on peripheral/edge sites. The Draft 2007 SUFP was assessed as an alternative scenario under the requirements of Strategic Environmental Assessment as Scenario 2 (Environmental Report Section 6.2.3), whereby the evaluation concluded that such a scenario would have adverse impacts (section 7.3.2 of the Environmental Report). These can be summarised as follows:

Key	Issue	Sub. No.	Map No.	Manager's Response & Recommendation
	facing Sandyford by being flexible. Supports 2007 SUFP, which benefited the entire estate, was less prescriptive and more flexible and presented sound urban design principles. This strategy should be revisited.			 Trip generation by private car would be likely to increase; The uptake in smarter travel, more sustainable modes of transport would be significantly less likely to be achieved; It would not provide for the consideration of infrastructural capacity needs with respect to water and drainage and the approach to building height would be likely to result in adverse residual impacts on residential amenity; Provides no clear rationale or definition of the meaning of Mixed Use Recommendation No change to Variation No.2: SUFP (v)
(v)	The development strategy for SBD should provide for the attraction of indigenous and international investment.	V2074		The Plan does provide for the attraction of indigenous and international investment. The Plan Recognises Sandyford Business District as an economic growth centre in accordance with the Regional Planning Guidelines as detailed in Section 1.6.1 'Rationale Underpinning the SUFP'. Recommendation No change to Variation No.2: SUFP
(vi)	No reference to National and Regional Planning – no policy context chapter. SUFP should recognise Sandyford as "the high tech knowledge driven commercial cluster for south city region" (Economic Development Action Plan for Dublin city region 2009)	V2072 V2074		Section 1.6.1 Rationale underpinning the SUFP, first bullet point, identifies the status of Sandyford within The Regional Planning Guidelines 2010-2022, recognising Sandyford Business District as a "primary growth centre". The preparation of the SUFP gave due regard to the policies and objectives of national and regional planning. Quoting sections from these Plans and the County Development Plan 2010-2016 (CDP), in the SUFP was not considered appropriate, given that the SUFP forms part of the CDP and that Section 1.34 of the CDP already identifies the national and regional context. Recommendation No change to Variation No.2: SUFP
1.2 Le	gal Status			
(i)	The SUFP is lacking statutory effect that would come with an LAP.	V2064 V2077 V2019		The SUFP will form part of the County Development Plan 2010-2016 by way of a Variation to the Plan. The County Development Plan is of a higher order than Local Area Plans. All development must accord with the policies and objectives as set out in the County Development Plan. The SUFP will be a statutory document upon the adoption of the Variation into the County Development Plan and all development will have to accord with its objectives and policies.

Key	Issue	Sub. No.	Map No.	Manager's Response & Recommendation
				Recommendation No change to Variation No.2: SUFP
(ii)	Lack of formal public consultation during the preparation of the SUFP – concern about the top down approach taken	V2069 V2070 V2071 V2072 V2073 V2048 V2022 V2010 V2017 V2022		The SUFP proposed Variation No.2 to the County Development Plan 2010-2016 is being prepared in accordance with the provisions of the Planning and Development Act 2000-2010. Full public consultation was undertaken as part of this statutory process. Recommendation No change to Variation No.2: SUFP
1.6 Pu	rpose of the Plan			
(i)	In favour of the broad set of principles which underpin the SUFP.	V2042		Noted. Recommendation No change to Variation No.2: SUFP
(ii)	The Plan should be based on a forward thinking vision for the area including the principles of New Urbanism: Encourage Walkability, Connectivity, Mixed Use and Diversity, Mixed Housing, Quality of Architecture and Design, Neighbourhood Structure, Increase density —	V2069 V2070 V2071 V2072 V2073 V2074		The Plan is based on creating a sustainable community whilst recognising Sandyford's role as an economic growth centre, together with a strategy to link existing dispersed development. The SUFP is based around the "Principle of New Urbanism" as quoted in the submission and in Section 2.1 of SUFP. Recommendation No change to Variation No.2: SUFP

Key	Issue	Sub. No.	Map No.	Manager's Response & Recommendation
	able to walk to services – legibility and way finding, green transportation, sustainability, quality of life.			
(iii)	Lacks a high level vision – based on linking sporadic development – not creating new dynamic self sustaining district.	V2069 V2070 V2072 V2073		The Rationale underpinning the Plan, as identified in Section 1.6.1 clearly sets out the purpose of the Plan and rationale behind the policies and objectives. They are specific to Sandyford based on the principles of good urban planning. The very first stages of the Plan preparation included survey and analysis followed by a rationale for future development. This can be seen in the Planning Background Papers (available for public viewing on the Council's website) Recommendation No change to Variation No.2: SUFP
(iv)	As the UFP has been in preparation for at least four years there was an expectation the it would be for a more long term view and in be more in depth.	V2008		In accordance with the Planning and Development Act 2000-2010, the Plan sets out a strategy for the life of the County Development Plan 2010-2016, which will be reviewed as part of the preparation of the next Development Plan. The Background Papers that support the Plan are available for public viewing on the Council's website. Recommendation No change to Variation No.2: SUFP
(v)	UFP and CDP should contain statement that no development in Sandyford should be injurious to nearby established residential areas.	V2008		The policies and objectives of the SUFP clearly states in section 1.6.1:Rationale underpinning the SUFP (point 3) "To protect the residential amenity of adjoining areas" As such Policies and objectives throughout the SUFP are in place to ensure the protection of residential amenity in particular BH2, Building Height. Recommendation No change to Variation No.2: SUFP
(vi)	Remove from Section 1.7 Pg. 9 SUFP the mention of the Junior and Pre-School on the Legionaries of Christ as they no longer exist there.	V2029		Recommendation Amend text in Section 1.7 to read "The Legionaries property is a large holding in single ownership. It currently provides accommodation specific for the religious order. Its current form is open in character with low-density development and use. There is an existing objective in the County Development Plan 2010-2016, to protect and/or provide for Institutional Uses on this site"

Key Issue	Sub. No.	Map No.	Manager's Response & Recommendation
Suggested rewording as follows: "The Legionaries property is a large holding in single ownership. It currently provides a novitiate specific for the religious order. Its current form is open in character with low-density development and use. There is an existing objective in the County Development Plan 2010-2016, to protect and/or provide for Institutional Uses on this site"			

Key Iss	ue	Sub. No.	Map No.	Manager's Response & Recommendation
LAND	ION 2. FUTURE USES			
2.1 P				
(i)	The Plan should be based on the principles of New Urbanism: Encourage Walkability, Connectivity, Mixed Use and Diversity, Mixed Housing, Quality of architecture and design, Neighbourhood structure, increase density – able to walk to services – legibility and way finding, green transportation, sustainability, quality of life.	V2069 V2070 V2071 V2072 V2073 V2031	1	The Plan is based on creating a sustainable community whilst recognising Sandyford's role as an economic growth centre, together with a strategy to link existing dispersed development. The SUFP is based around the "principles of New Urbanism" as quoted in the submission and in section 2.1.of SUFP. Recommendation No change to Variation No.2: SUFP
	ture Land Use Zones			
(i)	Radical re-zoning results in land use options being curtailed and land devalued – landowners are not presented with the same development opportunities – devaluation of land and no compensation suggested. Those mixuse planning permissions seeking extension of time will be refused e.g. as happened for the	V2046	1	If the whole of the Plan area continues to develop as a mixed use area the purpose of the Plan to guide and direct development is lost. The principle of 'New Urbanism' is providing for a mix of uses, but in a plan led environment is set out in Section 2.1 of the SUFP. Recommendation No change to Variation No.2: SUFP

Key Iss		Sub. No.	Map No.	Manager's Response & Recommendation
	`Blake' site in Stillorgan.			
(ii)	Mixed use zoning approach is considered more appropriate and more sustainable than designating different zones to accommodate different land uses .	V2069 V2070, V2071 V2072 V2073		If the whole of the Plan area continues to develop as a mixed use area the purpose of the Plan to guide and direct development is lost. The principle of 'New Urbanism' in providing for a mix of uses, but in a plan led environment is set out in Section 2.1 of the SUFP. Recommendation No change to Variation No.2: SUFP
(iii)	SUFP seeks to rationalise ad hoc developments with the core areas already determined and other areas to be left as they are as identified on Drawing no.11.	V2072 V2073	M1 & D11	The areas identified in Drawing 11 as existing development, are those areas within the SUFP where significant change in the type of development and nature of use is not provided for ie: Zone 4 Objective 'LIW' Light Industrial/Warehousing. This does not mean that development in these areas is anyway curtailed. It is considered appropriate, having regard to the principles of sustainable development, the location of these areas and their proximity to public transport nodes, together with the existing character of these areas, that the areas continue to develop with uses that are considered to be low intensity employment uses, such as light industrial and warehousing use.
(iv)	Challenges of land ownership have not been addressed.	V2069 V2070 V2072 V2073		The Planning Authority is looking at the strategic development of Sandyford, not at particular land ownerships. Recommendation No change to Variation No.2: SUFP
(v)	SUFP is developer led - should be employment based policy and should allow for the reworking and expansion of existing buildings and interim	V2071 V2072		The SUFP is promoting Sandyford Business District as a place of employment as identified in The 'Rationale underpinning the SUFP' in Section 1.6. The Manager supports the continuation of existing business across Sandyford Business District. Section 2.3.8 of the SUFP provides for the continuation, expansion and/or improvement of existing uses with an understanding that businesses/landowners are not necessarily intending on redeveloping their site in the short to medium term, if at all, and the need therefore, to continue and expand the existing business on site.
	uses to be permitted given current economic climate and likely delays in implementing the SUFP. For example at FAAC site to add chiestive "Provide uses"			It is considered that Section 2.3.8 'Existing Non Conforming Uses' could be reworded and strengthened for clarity purposes in order to allow for those areas/sites where existing businesses are operating successfully and which may wish to expand the existing uses into the future. 'Retail Warehousing' is 'permitted in principle' within the 'OE' Zone 3. Therefore text in Appendix 1 Zone 3 to be deleted: "Retail Warehousing shall be in accordance with RET12". Small scale convenience shops are 'open for consideration'. It is not appropriate to provide a core of comparison and convenience shops at this location, as it
	objective "Provide uses for existing building to			would undermine the policies and objectives as set out in Section .2.2 and 2.4.2 of the SUFP.

Key Iss	sue	Sub. No.	Map No.	Manager's Response & Recommendation
	include retail"			Recommendation To amend Section 2.3.8 to read "2.3.8 Areas in Transition" "Within Sandyford Business District there are uses that do not conform to the Zoning Objectives of the area. The Council will support the expansion and/or improvement of existing non-conforming uses that are not considered likely to impact negatively on the development potential of adjoining sites in accordance with the policies and objectives set out in the Sandyford Urban Framework Plan." Delete text in Appendix 1 'Land Use Zoning Objectives' "Retail Warehousing shall be in accordance with RET12"
	nd Use Policies			
Zoning	Policy SUFP1 Land Use			
(i)	SLOs conflict with Land Use Zoning Objectives where such uses are neither permitted in principle nor open for consideration	V2023 V2060		Noted that uses permitted in principle/open for consideration do not allow for those promoted under SLO's in certain circumstances. Recommendation Amend text SUFP 1 (Section 2.3.1) as follows after "The different land uses are set out below. The land use zoning objectives, that is; the uses permitted in principle and open for consideration are set out in Appendix 1. In addition specific Local Objectives are identified at site specific locations (Appendix 2 and Map 1 SUFP and Map 6 CDP). Within Sandyford Business District, in cases where the Land Use Zoning Objectives appear to conflict with the requirements of a Specific Local Objective, the uses promoted under the Specific Local Objective will be allowed for in addition to the uses permitted in principle and open for consideration".
2.3.2 2	Zones 1 & 2 Mixed Use			
Core A	rea			
(i)	Written text and objectives for Zone 1 and 2 undermines Mixed Use Designation – with restrictions on residential and retail development. There should be no restrictions on the uses permitted in principle in the Mixed Use Core Areas. Local retail is not considered	V2063 V2066 V2073	1	If the whole of the Plan area continues to develop as a mixed use area the purpose of the Plan to guide and direct development is lost. The principle of 'New Urbanism' is providing for a mix of uses in a plan led environment. This is set out in Section 2.1 of the SUFP. Sandyford Business District does not appear in the Dún Laoghaire-Rathdown County Retail Hierarchy and as such retail development should have a local catchment only. Retail development in the Mixed Use Cores Areas, Zone 1 and 2, is restricted accordingly by objectives MC1, MC2 and MC3. A significant amount of retail development is already clustered in Zone 1 'MIC', comprising large scale retail development and is considered to provide for the existing and future projected population. However, it is considered that further small scale retail and retail services are appropriate to the Mixed Use Core Area, particularly along Ballymoss Road, a major pedestrian route into Sandyford Business District from the proposed Transport Interchange and as such this type of development has been catered for under the land use zoning objective MC9.
	appropriate to achieve			As part of the assessment of future housing in the Dún Laoghaire-Rathdown County, Sandyford has not been

Key Iss	ue	Sub. No.	Мар	Manager's Response & Recommendation
	objective MC9.		No.	identified as having to provide significant amounts of housing to reach the targets set in the County's Housing Strategy. The Mixed Use Core areas contain existing permissions for well over 3,000 residential units to date, which is considered sufficient to sustain the vitality of these areas. The land use zoning Objective MC4 allows for these current permissions to be built out or the equivalent, if they expire. Additional residential development shall be provided in Zone 5, areas which are proposed to cater for alternative housing needs to that already provided for in Sandyford Business District, areas that can be designed to create environments conducive to the development of sustainable residential neighbourhoods.
				Recommendation No change to Variation No.2: SUFP.
(ii)	Zone 1 and Zone 2 should be amalgamated as Zone 1 in order to alleviate restrictions. In particular to incorporate the Siemens site into Zone 1, which is strategically located at the end of Kilmacud Road – ideal position to create a "marker" and relevant to the objectives MC8, MC9 and SLO 109.	V2063 V2066 V2073		There is a clear distinction between Zone 1 and Zone 2 in terms of land use and density and scale. To amalgamate the two zones would significantly increase the development potential of the area beyond the infrastructure capacity of the area. Due to the limited quantum available it is necessary to utilise the development resources in areas which would have the maximum benefit for the residents and workers of the SBD. Recommendation No change to Variation No.2: SUFP.
(iii)	Supports Objective MC7.	V2073		Noted
(iv)	Unclear as to whether the requirements of	V2073	1, D10	Recommendation No change to Variation No.2: SUFP. This site is zoned Objective 'MOC', whereby the open space requirements are identified under Objective MC7 and the provision of pocket parks/urban plazas under SLO 121. In the case of the Siemens site, the SUFP requires that any
	OE1 or MC7 and/or SLO121 are to be applied to Siemens			development provides an urban plaza amounting to 10-15% of the site, as identified on Map 1 and Drawing 10. The provision of an urban plaza here is important to create a high quality public realm at this strategic location opposite the proposed transport interchange and at the entry point to the main pedestrian route leading from the interchange

Key Iss		Sub. No.	Map No.	Manager's Response & Recommendation
	Site. If this is the case, then the development standards for this site shall be revised upwards.			to SBD. Recommendation No change to Variation No.2: SUFP
(v)	Zoning 'MOC' is appropriate for Ballymoss Road and compatible with the area.	V2050	1	Noted. Recommendation No change to Variation No.2: SUFP
	Zone 3 Office Based			
(i)	The provision that there should be strong animated and active street edges in the residential zone should also be applied to the employment zonings which need ground floor retail/ services to animate street frontages and public spaces, especially along pedestrian/ cycle paths for safety and attractiveness.	V2013		Regard has to be had to the origin and destination of trips and the routes between as identified in the Plan in section 3.4 'Wayfinding'. The Manager does not agree that a dispersed retail policy will animate streets. If retail is spread too thin across the Plan area, this will compromise vitality and viability of the core areas and the animation of strategic pedestrian routes. Recommendation No change to Variation No.2: SUFP
(ii)	Supports the 'OE' zoning objective at South County Business Park.	V2042	1	Noted. Recommendation No change to Variation No.2: SUFP
(iii)	Uses permitted in principle/open for consideration in Zone 3 are too restrictive. Should include "cash and carry/wholesale	V2065 V2071		Zone 3 provides for retail warehousing, cash and carry/wholesale outlet and local – small scale convenience retail shops – all of which are open for consideration under the Land Use Zoning Objectives (Appendix 1). Section 18.4 of the CDP 2010-2016 states that "Uses shown as open for consideration are uses which may be permitted where the Planning Authority are satisfied that the proposed development would be compatible with the overall policies and objectives for the zone, would not have undesirable effects and would otherwise be consistent

Key Issue	Sub. No.	Map No.	Manager's Response & Recommendation
outlet, indust light/industry gener and industry specia and allow for loc retail to be permitted in principle at neighbourhood retopen for consideration policy DS2 to extent to zone 3. Tempora commercial uses to allowed in advance redevelopment.	al al al al ad ail an ad ad ad ad		with the proper planning and sustainable development of the area". Therefore these uses are not precluded from the zoning. Recommendation No change to Variation No.2: SUFP
(iv) The Office and Enterprise Zoning too large, with to high a capacity assigned to site which will tall resources like parking capacity from existing sites. The prese unoccupied building will also likely demolished.	is cooking a coo		The detailed analysis of infrastructure capacity supports the zoning and plot ratios that are proposed in the SUFP. Recommendation No change to Variation No.2: SUFP
Christ site har requested the insertion of 'resident institution' use as 'Permitted in Princip use under Zone 3 athe removal proposed 'Institutional objective	on al a e' od of ot'		The site at Legionaries of Christ has an existing Objective "To protect and provide for institutional use in open lands". Under Policy RES5 "it is Council Policy that where distinct parcels of land are in institutional use, such as education, health, residential or other such uses are proposed for redevelopment, the Council shall seek to retain the open character of these lands wherever possible". Having regard to the existing residential institution on site, it is therefore, not necessary to extend the Land Use Zoning Objective to include Residential Institution. Furthermore, the Institutional zoning is considered appropriate to protect its existing open character. Recommendation No change to Variation No.2: SUFP
(vi) Re: ESB lands exter zoning objective O			The ESB has raised the issue of zoning of part of their land for objective 'LIW' light industrial / warehousing for a set

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			No.	3
(vii)	Office across entirety of ESB site. SUFP shows west of site as Industry/ Warehousing (LIW/ Zone 4) but this brownfield land is currently in office use, and ESBs own short term expansion is focussed on the west portion, so phasing cannot disrupt normal services (200,000 people currently served by ESB operations from the site and is one of four Dublin Region Bulk electricity supply points). Current zone 'E' is compatible with the site. But in SUFP it should be Objective OE/Zone 3 and not LIW. Also, office, not warehousing frontage, needed as a good first impression to the area.			of reasons that are unique to the ESB. The existing ESB facility at Leopardstown Roundabout is an important piece of infrastructure as it accommodates the Distribution National Control Centre and the System Control and Data Acquisition (SCADA) operations centre. The submission from the ESB explains that this centre serves 200,000 people. The phasing of any redevelopment for future office accommodation will need to ensure that existing services are not disrupted. The ESB have made a strong argument based on the need to phase the redevelopment of their site and the parallel plans for development at Carrrickmines, that the lands on the western portion of their holding are those that they will be able to develop first. In addition to the argument for the change in zoning the ESB have argued that the plot ratio of 1:1.5 should be extended to their full land holding, this would increase their potential office floor area by circa 23,400sqm. This argument is based on an analysis done by ARUPS on the likely trips generated by the proposed floor area. Having considered this aspect of the submission, the Manager is confident that the modelling underpinning the Sandyford Urban Framework Plan is robust and that the basis on which ARUPS calculations were made differs to that used in the Council model and are not considered appropriate. The ESB have also argued that their site is at a gateway into Sandyford due to the future road scheme (six year road objective, number 6). The Plan has been consistent in its approach not to celebrate the periphery of the SBE by attributing higher densities, but by concentrating this capacity closer to multi modal access points and mixed use core areas. The argument made here by the ESB has been made by a number of submissions. The Manager having regard to the issues raised by the ESB and being cognisant of their strategic role as an energy supplier, network provider and distributor, considers that their argument in respect to the chronology in which their site can be developed is unique. T
(vii)	served by ESB operations from the site and is one of four Dublin Region Bulk electricity supply points). Current zone 'E' is compatible with the site. But in SUFP it should be Objective OE/Zone 3 and not LIW. Also, office, not warehousing frontage, needed as a good first			The ESB have also argued that their site is at a gateway into Sandyford due to the future road scheme (six year road objective, number 6). The Plan has been consistent in its approach not to celebrate the periphery of the SBE by attributing higher densities, but by concentrating this capacity closer to multi modal access points and mixed use core areas. The argument made here by the ESB has been made by a number of submissions. The Manager having regard to the issues raised by the ESB and being cognisant of their strategic role as an energy supplier, network provider and distributor, considers that their argument in respect to the chronology in which their site can be developed is unique. The Manager considers it critical that the response to the issues raised is consistent with the rationale underpinning the Plan and the overall potential for development in the area. The Manage understands from this submission that it is not feasible to redevelop the existing ESB buildings in the short to medium term due to the infrastructure they house and that the ESB has a strong argument to develop the western portion of their lands first. As set out in the Plan there is a finite capacity for office based employment in Sandyford and while the Manager does not propose to increase the overall quantum that the Plan generates, the Manager would recommend the redistribution of the Office Based employment zoned land across the ESB holding. This can be achieved by reducing the plot ratio in the area of the site where the existing buildings are located so that the existing low density ESB buildings can remain as is with potential for limited additional development, a plot ratio of 1:0.5 is recommended while the area to the west of the land holding is zoned for office based employment, objective 'OE' and given a plot ratio of 1:1.5. The overall result of these changes does not materially alter the overall floor area of office-based employment being facilitated in Sandyford Business District.

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(.iii)	MOC	V2024		 On land to the west of the ESB Link Road to Blackthorn Road (6 year road proposal), lands that are within the ESB holding (an area of land of circa 1.56ha), the zoning objective changes from Light Industrial Warehousing to Office based Employment Uses. The plot ratio of these same lands is increased from 1:1 to 1:1.5. On lands to the east of the ESB Link Road to Blackthorn Road and South of the ESB Link Road to Arena Road (6 year road proposal), lands within the ESB holding (an area of land of circa 2.65 ha) the plot ratio of the land will be reduced from 1:1.5 to 1:0.5. The lands to the west of the ESB Link Road to Blackthorn Road (6 year road proposal) that are zoned office based employment and that are located from the rear of the Eircom Lands to the Leopardstown Roundabout (an area of circa 1.85ha) the proposed building height limit be changed from a proposed building height limit of 2 storey height to a proposed building height limit of 5 storey height. Amend Drawing 11 to represent alterations to the ESB site.
(viii)	MOC zone uses, including retail, should be considered to allow for a mix of uses and development density appropriate to the Eircom site.	V2034	1	The Manager does not agree with the submission as set out. The purpose of the Plan, set out in Section 1.6 'Rationale underpinning the SUFP' is based on Sandyford Business District continuing to be of strategic importance as an employment area. Sandyford Business District is not a designated District Centre and therefore a significant increase in the retail base cannot be justified. Recommendation No change to Variation No.2: SUFP
(ix)	Zone 3 uses should be amended to include: Convenience (inc. supermarket), as "open for consideration". The dispersion of retail works best and helps prevent traffic bottlenecks and encourages movement.	V2032		The 'Rationale underpinning the SUFP' is based on Sandyford Business District continuing to be of strategic importance as an employment area. Sandyford Business District is not designated as a retail centre in the Regional Planning Guidelines nor in the DLR CDP 2010-2016. As such retail in SBD shall provide for the Neighbourhood/local population. Any retail development shall be clustered to ensure vitality and viability. The majority of existing retail (Comparison/Convenience) is currently located and permitted within the Mixed Use Core Areas within close proximity to public transport, residential and employment zoned lands and as such any future development, aside from local shops, shall be located in these areas. Recommendation No change to Variation No.2: SUFP.
(x)	Landbank, including Febvre, Cannon/Spirit Motor group, Arena House and Bord Gais sites zoned 'OE' restricts retail and	V2069	1	Sandyford Business District does not appear in the Dún Laoghaire-Rathdown County Retail Hierarchy and as such retail development should have a local catchment only. A significant amount of retail development is already clustered in Zone 1 'MIC', comprising large scale retail development, located in close proximity to a higher density mix of uses and existing and proposed residential areas. This retail is of a scale to provide for the existing and future projected population of Sandyford Business District. In addition smaller scale retail and retail services are currently provided in Zone 2 to cater for the immediate residential and employment population and to serve the pedestrians along the

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	residential – considered appropriate location to provide ground floor retail and residential development above and mixed use development to create 'The Heart' of Sandyford Business District.			major route of Ballymoss Road from the Transport Interchange. The Plan allows for the further development of retail in these areas to serve the 'Heart' of Sandyford Business District and local residential and employment catchment. Under the Land Use Zoning Objective 'OE', small scale convenience shops are "open for consideration" in Zone 3, in order to cater for the needs of the local employment population. As part of the assessment of future housing in the Dún Laoghaire-Rathdown County, Sandyford has not been identified as having to provide significant amounts of housing to reach the targets set in the County's Housing Strategy. The Mixed Use Core areas contain existing permissions for well over 3,000 residential units to date, which is considered sufficient to sustain the vitality of these areas. The land use zoning Objective MC4 allows for these current permissions to be built out or the equivalent, if they expire. Additional residential development shall be provided in Zone 5, areas which are proposed to cater for alternative housing needs to that already provided for in Sandyford Business District, areas that can be designed to create environments conducive to the development of sustainable residential neighbourhoods. Recommendation No change to Variation No.2: SUFP.
(xi)	No rationale for AIB site and Sandyford Office Park to be Zone 3. Zone 2 designation should extend along entire frontage of Blackthorn Avenue – mix of uses including retail.	V2070	1	The Manager does not agree with the submission as set out. The purpose of the Plan, set out in Section 1.6 'Rationale underpinning the SUFP' is based on Sandyford Business District continuing to be of strategic importance as an employment area. Sandyford Business District is not a designated District Centre and therefore a significant increase in the retail base cannot be justified. Recommendation No change to Variation No.2: SUFP
(xii)	Leopardstown Retail Park – the 2 different land use zones, Zone 3 and 5, divide the site and existing building. No rationale for zone 5 here – stand alone residential. To retain	V2070	1	This site, cannot be viewed in isolation, it is one of a number of sites, which has potential to provide a coherent, attractive urban fabric by providing a mix of uses within the estate with its own character and identity. The location of these sites although located to the outer edge of the SBD offer opportunities to integrate the area into the fabric of the estate and adjacent area by providing new routes and connections. It is considered that the permitted / open for consideration uses under zone 3 & 5 are appropriate to provide all necessary local amenities. The purpose of the Plan is not to consider land ownership boundaries but to consider the future development of Sandyford Business District from a strategic perspective.

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	retail warehousing on this site – Zone 3.			Retail Warehousing and Warehousing are 'Permitted in Principle' under Land Use Zoning Objective 'LIW' Zone 4. Recommendation No Change to Variation No.2: SUFP
(xiii)	OE1 requires the provision of pocket parks identified on Map 1 – pocket parks are not shown on Map 1.	V2070 V2073	1	To clarify - the location of the Pocket Parks are identified on Map1 Specific Local Objective 121 - cross referenced with Appendix 2 (see legend on Map 1). Recommendation No Change to Variation No.2: SUFP.
(xiv)	OE1 requires 10-15% of site for open space - seems unfair given low plot ratio proposed for Sandyford Business Park site and proximity of site to reservoir amenity.	V2070	1	Objective OE1 and the provision of pocket parks/urban plazas under SLO 121 requires that any development provides an urban plaza amounting to 10-15% of the site. All zones (except residential zone 5) require this provision. This provision is not therefore considered to be unfair. The Reservoir does not currently provide amenity to the workers of Sandyford. The importance of open space and public realm are critical to promoting Sandyford Business District as an attractive environment for the Smart economy. Recommendation No change to Variation No.2: SUFP.
	Zone 4 Light trial/Warehousing			
(i)	Lands at Bracken, Furze and Heather Road – LIW zoning does not reflect the diverse mix of uses/ intensity (office based industry well established alongside warehousing). The change of the zoning will preserve a very fractured and imbalanced form of urban development	V2027 V2031 V2062 V2055	1,2	The office development supply accords with the Regional Planning Guidelines for the GDA 2010-2022. The Infrastructure Capacity studies have shown that Sandyford Business District does not have the capacity to carry additional office based employment. The draft Sandyford Urban Framework Plan 2007 was never adopted by the Councillors nor approved by Management of Dun Laoghaire- Rathdown County Council and as such does not have a statutory basis. The lands at Furze, Heather and Bracken Roads are in the main to be considered peripheral/edge sites within Sandyford Business District. The 2007 Sandyford Urban Framework Plan promoted mixed use high density development within these areas. However, the 2007 SUFP was assessed as an alternative scenario under the requirements of Strategic Environmental Assessment as Scenario 2 (Environmental Report Section 6.2.3) whereby the evaluation concluded that such a scenario would have adverse impacts (section 7.3.2 of the Environmental Report). These can be summarised as follows: Trip generation by private car would be likely to increase; the uptake in smarter travel, more sustainable modes of transport would be significantly less likely to be achieved; it would not

Key Issue		Sub. No.	Map No.	Manager's Response & Recommendation
recent (Heather House) under 'E 'OE' or should As a res height t (and hig urban ec ratio 1:2 corner s fronting Road. (ii) 2007 allowand	ring the more developments r House and Q To develop E' parameters, 'LIW' uses be expanded. sult - increase to 3-5 storeys gher along the dges) and plot 2, especially at sites and those Blackthorn SUFP made te for such nsity/height.			provide for the consideration of infrastructural capacity needs with respect to water and drainage and the approach to building height would be likely to result in adverse residual impacts on residential amenity; provides no clear rationale or definition of the meaning of Mixed Use . The sites fronting Blackthorn Road do require uses that will create street frontage, but that does not necessarily require the lands to be zoned 'OE' Zone 3. Uses are provided for under Zone 4 'LIW' which will define the street. However, having regard to the location of these sites and the acceptance of the sites position fronting Blackthorn Road warrants consideration of increased plot ratios in accordance with the proposed building heights of 4 storeys at Bracken Road and Furze Road (Those sites at junction of Heather Road and Blackthorn Road have a proposed plot ration of 1:2). Recommendation To increase plot ratio from 1:0.5 to 1:2 fronting Blackthorn Road (at Furze/Heather/Bracken Road) Amend Map 2.
(iii) Land us Stillorgal Est, 'LIW Transport future potential zoning standitional regard to location public trand Mix areas, areas from Ave. are Road. Should facilitate	se zoning at	V2037 V2053	1	With the limited quantum available the SUFP seeks to utilise this quantum in areas / sites which would consolidate and enhance existing areas within SBD. It is considered that Stillorgan industrial estate provides necessary lower intensity type employment uses and retains its own coherent character and identity, which would be eroded with an increased plot ratio. Recommendation No change to Variation No.2: SUFP

Key Iss	ue	Sub. No.	Map No.	Manager's Response & Recommendation
	Blackthorn Road to address existing abrupt transition of uses/building typologies.			
(iv)	Zone 4 uses should be amended to include: Convenience (inc. supermarket), as "open for consideration". The dispersion of retail works best and helps prevent traffic bottlenecks and encourages movement.	V2032		Sandyford Business District is not designated as a retail centre in the Regional Planning Guidelines nor in the DLR CDP 201-2016. As such retail in SBD shall provide for the Neighbourhood/local population. Any retail development shall be clustered to ensure vitality and viability. The majority of existing retail (Comparison/Convenience) is currently located and permitted within the Mixed Use Core Areas within close proximity to public transport, residential and employment zoned lands and as such any future development, aside from local shops, shall be located in these areas. Recommendation No change to Variation No.2: SUFP
(v)	Objective 'LIW' at Stillorgan Ind. Estate does not take account of existing uses eg: offices, retail warehousing, motor sales, in so far as many are office based.	V2056	1	'LIW' makes provision for the uses that are currently prevalent within Stillorgan Industrial Estate (as mentioned in the submission). It is considered that these uses are not akin to office-based industry (which are industries which provide a product or service related to offices uses), but appreciate that they are uses that may have an ancillary office facility. Offices (ancillary only) are "permitted in principle" under Land Use Zoning Objective 'LIW'. Recommendation No change to Variation No.2: SUFP
(vi)	The uses 'Permitted in Principle' under zoning LIW should include 'Offices'. The site currently benefits from a significant office element while related to overall use of the unit is unlikely to be considered 'ancillary	V2033		The Manager cannot recommend 'Office' to be 'permitted in principle' in the 'LIW' Land Use Zone 4 as this would fundamentally undermine the Zone 3 Land Use Zoning Objective (Office Based Employment) and result in additional peak hour trips being generated beyond those catered for within infrastructure capacity. The Manager supports the continuation of existing business across Sandyford Business District. Section 2.3.8 of the SUFP provides for the continuation, expansion and/or improvement of existing uses with an understanding that businesses/landowners are not necessarily intending on redeveloping their site in the short to medium term, if at all, and the need therefore, to continue and expand the existing business on site. It is considered that Section 2.3.8 'Existing Non Conforming Uses' could be reworded and strengthened for clarity

Key Iss	sue	Sub. No.	Map No.	Manager's Response & Recommendation
	only' as specified in SUFP zoning LIW.			purposes in order to allow for those areas/sites where existing business are operating successfully and which may wish to expand the existing uses into the future. Recommendation To amend Section 2.3.8 to read "2.3.8 Areas in Transition" "Within Sandyford Business District there are uses that do not conform to the Zoning Objectives of the area. The Council will support the expansion and/or improvement of existing non-conforming uses that are not considered likely to impact negatively on the development potential of adjoining sites in accordance with the policies and objectives set out in the Sandyford Urban Framework Plan."
(vii)	Re: units 11 & 12 Holly Avenue the SUFP provisions of a school and 'LIW' zoning results in conflicts and uncertainty in relation to any future development on the site so the SUFP should be amended to reflect the existing quality and quantity of development on the site, and only objectives that can be reasonably delivered in the life span of the Development Plan be included.	V2033		The provision of school sites accords with the requirement of the Department of Education. It is necessary to identify sites so that they will be available at appropriate locations when required. The Department have agreed with the sites identified in the Plan and consider them to be appropriate in a developed area/area in transition, considering there are no greenfiled sites within Sandyford Business District. The office development supply accords with the Regional Planning Guidelines for the GDA 2010-2022. The Infrastructure Capacity studies have shown that Sandyford Business District does not have the capacity to carry additional office based employment. The Manager supports the continuation of existing business across Sandyford Business District. Section 2.3.8 of the SUFP provides for the continuation, expansion and/or improvement of existing uses with an understanding that businesses/landowners are not necessarily intending on redeveloping their site in the short to medium term, if at all, and the need therefore, to continue and expand the existing business on site. It is considered that Section 2.3.8 'Existing Non Conforming Uses' could be reworded and strengthened for clarity purposes in order to allow for those areas/sites where existing business are operating successfully and which may wish to expand the existing uses into the future. Recommendation To amend Section 2.3.8 to read "2.3.8 Areas in Transition" "Within Sandyford Business District there are uses that do not conform to the Zoning Objectives of the area. The Council will support the expansion and/or improvement of existing non-conforming uses that are not considered likely to impact negatively on the development potential of adjoining sites in accordance with the policies and objectives set out in the Sandyford Urban Framework Plan."
(viii)	To zone Gateway site at Bracken Road 'MH' given proximity to Beacon Medical Campus and its ability	V2057	1	Issue noted. It is agreed that the northern section of this site (Gateway site) could accommodate Medical uses having regard to the site's location, immediately adjacent to the proposed 'MH' Zone 6 and the site's ability to connect into the existing Beacon Medical Campus and complete the development block. Zoning alteration and height and plot ratio amendments can be made without affecting the overall infrastructure

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to connect to the Beacon Hospital, and its strategic location at entry point to SBD.			requirements in that the MH zoning objective as developments will be required to demonstrate that they do not add to peak hour traffic within the Sandyford Business District, subject to certain provisos. Recommendation Zone lands at northern section of "Gateway" site for 'MH' Zone 6 as per Map 1, amend plot ratio on Map 2 to 1:2.5 and amend Building Height on Map 3 to show 6 storeys.
2.3.5 Zone 5 Residential			
(i) Ravenscourt Business Park is a very recent office development in active use and has no interest in redeveloping for residential purposes. Due to amount of unoccupied residential units in the plan area and timeframe of the Development Plan, there is no real prospect of new residential. Rezone for 'Mixed Core Area' uses.	V2018		It is considered appropriate to identify areas where, as the area goes through transition, residential development is appropriate. Carmanhall Road is considered appropriate for the reasons set out in Section 2.3.5 of the SUFP. The Manager supports the continuation of existing business across Sandyford Business District. Section 2.3.8 of the SUFP provides for the continuation, expansion and/or improvement of existing uses with an understanding that businesses/landowners are not necessarily intending on redeveloping their site in the short to medium term, if at all, and the need therefore, to continue and expand the existing business on site. It is considered that Section 2.3.8 'Existing Non Conforming Uses' could be reworded and strengthened for clarity purposes in order to allow for those areas/sites where existing business are operating successfully and which may wish to expand the existing uses into the future. Recommendation To amend Section 2.3.8 to read "2.3.8 Areas in Transition" "Within Sandyford Business District there are uses that do not conform to the Zoning Objectives of the area. The Council will support the expansion and/or improvement of existing non-conforming uses that are not considered likely to impact negatively on the development potential of adjoining sites in accordance with the policies and objectives set out in the Sandyford Urban Framework Plan."
(ii) Units A2/3/4 & 1C Three Rock Road should be Zone 3 (office with ground floor retail) to create a consistent streetscape.	V2025		It is considered appropriate to identify areas where, as the area goes through transition, residential development is appropriate. Carmanhall Road is considered appropriate for the reasons set out in Section 2.3.5 of the SUFP. Sandyford Business District is not a designated District Centre and therefore a significant increase in the retail base cannot be justified. The office development supply accords with the Regional Planning Guidelines for the GDA 2010-2022. The Infrastructure Capacity studies have shown that Sandyford Business District does not have the capacity to carry additional office based employment. Recommendation No change to Variation No.2: SUFP

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(iii) DLRCC should a the rationale for objective for granother 250,000 office space another 12,500 places, and for a 1,000 residence top of those a permitted. So 5.2.1 of CDP "there are su zoned residentia for any forecast in the state of	or the v2035 ranting v2038 Om² of v2044 v2025 work nother es on already Section states, fficient I lands	NOI	In respect to the proposed residential development of up to 1,000 units (that is 729 included in the traffic model and additional units available from expired residential permissions) it should be noted that the CDP 2010-2016 land use zoning objective 'E' and SLO 24 provided for residential development. The SUFP only attempts to rationalise the residential development and locate it into areas which will create sustainable neighbourhoods. The Core Strategy does not indicate that lands cannot be zoned in the interim period before its preparation. The SUFP recognises Sandyford as an economic growth centre in accordance with the RPG's as identified in section 1.6.1 of the Plan and in the Land Use Zoning Policy SUFP1. Recommendation No change to Variation No.2: SUFP
recognising its as a Primary (Road Also dential as this to core section anning tion of t Plan. uld be elop as Zoning, status Growth onomic 2010- under-		
(v) Proposed rezoni Three Rock	ing at V2035 Road		It is considered appropriate to identify areas where, as the area goes through transition, residential development is appropriate. Carmanhall Road is considered appropriate for the reasons set out in Section 2.3.5 of the SUFP.

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	would make Eurosales premises a non-conforming use limiting its future development or expansion, and			The Manager supports the continuation of existing business across Sandyford Business District. Section 2.3.8 of the SUFP provides for the continuation, expansion and/or improvement of existing uses with an understanding that businesses/landowners are not necessarily intending on redeveloping their site in the short to medium term, if at all, and the need therefore, to continue and expand the existing business on site.
	impacting on its value, also possible job losses Re: Eurosales. The premises is subject to			It is considered that Section 2.3.8 'Existing Non Conforming Uses' could be reworded and strengthened for clarity purposes in order to allow for those areas/sites where existing business are operating successfully and which may wish to expand the existing uses into the future.
	a 250 year lease to DLRCC - unfair to amend the uses to be inconsistent with it. Request to rezone this site to Mixed Use Zoning.			Recommendation To amend Section 2.3.8 to read "2.3.8 Areas in Transition" "Within Sandyford Business District there are uses that do not conform to the Zoning Objectives of the area. The Council will support the expansion and/or improvement of existing non-conforming uses that are not considered likely to impact negatively on the development potential of adjoining sites in accordance with the policies and objectives set out in the Sandyford Urban Framework Plan."
(vi)	Three Rock Road – Object rezoning to Zone 5 Residential as - this is contrary to the current zoning, and the DLRCC County	V2023 V2025		In respect to the proposed residential development of up to 1,000 units (that is 729 included in the traffic model and additional units available from expired residential permissions) it should be noted that the CDP 2010-2016 land use zoning objective 'E' and SLO 24 provided for residential development. The SUFP only attempts to rationalise the residential development and locate it into areas which will create sustainable neighbourhoods. Residential development under the 'E' zoning is allocated for in the Council's Housing Strategy.
	Development Plan and a single (residential) use is inflexible.			The SUFP will form part of the CDP by way of Variation No.2. If adopted, the policies and objectives will form part of the CDP and will therefore not be contrary to the CDP.
	Should remain zone 'E' with residential and retail option for ground			If 'E' zoning were retained, the purpose of the SUFP as identified in Section 1.6 'Rationale Underpinning the SUFP' would be undermined.
	floor.			Recommendation No Change to Variation No.2: SUFP
(vii)	`A2' zoning at Carmanhall Neighbourhood	V2044	1	It is considered appropriate to identify areas where, as the area goes through transition, residential development is appropriate. Carmanhall Road is considered appropriate for the reasons set out in Section 2.3.5 of the SUFP.
	conflicts with existing commercial business – SUFP needs to support these businesses.			The Manager supports the continuation of existing business across Sandyford Business District. Section 2.3.8 of the SUFP provides for the continuation, expansion and/or improvement of existing uses with an understanding that businesses/landowners are not necessarily intending on redeveloping their site in the short to medium term, if at all, and the need therefore, to continue and expand the existing business on site.

Key Iss	sue	Sub. No.	Map No.	Manager's Response & Recommendation
				It is considered that Section 2.3.8 'Existing Non Conforming Uses' could be reworded and strengthened for clarity purposes in order to allow for those areas/sites where existing business are operating successfully and which may wish to expand the existing uses into the future.
				Recommendation To amend Section 2.3.8 to read "2.3.8 Areas in Transition" "Within Sandyford Business District there are uses that do not conform to the Zoning Objectives of the area. The Council will support the expansion and/or improvement of existing non-conforming uses that are not considered likely to impact negatively on the development potential of adjoining sites in accordance with the policies and objectives set out in the Sandyford Urban Framework Plan."
(viii)	No primary school existing or proposed in vicinity of A2 zoned land at Carmanhall Road Neighbourhood.	V2038	1	There are 2 existing primary schools within walking distance of Sandyford, however, these schools would not have the capacity to serve Sandyford. The proposed sites for education within the SUFP are both within walking distance from the Carmanhall Residential Neighbourhood. These routes and links are proposed for improvement in the SUFP (Drawing nos. 6, 10 and 11). The provision of school sites accords with the requirement of the Department of Education.
				Recommendation
(ix)	The lands to be zoned Residential Zone 5, Objective 'A2', South County Business Park, should be zoned 'OE'	V2059 V2075 V2058	1	No change to Variation No.2: SUFP In proposed Variation No.2: SUFP, lands in South County Business Park are zoned Objective 'A2' residential. These lands are adjacent to the Leopardstown Park Hospital, the Luas stop at Central Park and the core area at Central Park. The location provides an appropriate residential environment while having the added benefit of providing activity for those going to and from the Luas to the businesses located in South County Business Park.
	with provision for residential			The IDA is clear in their submission that they do not agree with the residential zoning and request that the land be zoned Objective 'OE' Office Based Employment.
	development. Zoning objective is outside the limits of lease governing the lands, conflict with the original concept and purpose of the Park. Zoning not making full use of Luas and would			The Manager is cognisant of the role of the IDA in attracting internationally trading businesses and having considered their submission and having regard to ER10 of the Regional Planning Guidelines for the Greater Dublin Area recommends a change to the SUFP by way of an additional Specific Local Objective. This Specific Local Objective would facilitate office based employment within the Residential Zoning at this location. The Manager considers that the zoning should not be altered so that an element of residential development is considered by the IDA in order to create activity in this area on what is a very important pedestrian route to Central Park Luas stop. In designing the layout of the site, cognisance should be given to the residential amenity of residents in the adjoining Central Park.
	be isolated from other			Recommendation
	residential development.			To amend Variation No.2:SUFP Appendix 2 Specific Local Objectives and Map 1 to include:
				SLO123: To facilitate the IDA in attracting internationally trading businesses office based employment will be considered on these lands to a similar plot ratio to that of the remainder of the South County Business Park. In

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				preparing a Masterplan for the area regard should be given to providing activity along the route to the Luas and to the residential amenity of adjoining residents.
(x)	A2' zoning objective is too restrictive.	V2059 V2060	1	It is considered that the Land Use Zoning Objectives allow for uses either permitted in principle or open for consideration, which are appropriate to provide all necessary local amenities. The uses are limited to those that will create an attractive residential environment. Recommendation No change to Variation no.2: SUFP.
(xi)	Lands to be zoned Residential, Zone 5 Objective 'A2', at Corner of Carmanhall Road /Blackthorn Road should be zoned 'MOC'. To clarify the allocation of residential units previously permitted.	V2060	1	It is considered appropriate to identify areas where, as the area goes through transition, residential development is appropriate. Carmanhall Road is considered appropriate for the reasons set out in Section 2.3.5 of the SUFP. Sandyford is not a designated District Centre. It is critical to create a retail and service core and not to spread these uses too thin, in order to create vitality and viability. Permission had been granted for residential development on this site previously. A reduced density is proposed in the SUFP. Recommendation No change to Variation no.2: SUFP.
(xii)	Leopardstown Retail Park – the 2 different land use zones, Zone 3 and 5, divide the site and existing building. No rationale for zone 5 here – stand alone residential. To retain retail warehousing on this site – Zone 3.	V2070	1	This site, cannot be viewed in isolation, it is one of a number of sites, which has potential to provide a coherent, attractive urban fabric by providing a mix of uses within the estate, with its own character and identity. The location of these sites although located to the outer edge of the SBD offer opportunities to integrate the area into the fabric of the estate and adjacent area by providing new routes and connections. It is considered that the permitted in principle / open for consideration uses under zone 3 & 5 are appropriate to provide all necessary local amenities. Recommendation No change to Variation No.2: SUFP
	Zone 6 Medical			
(i)	Rezoning of lands at Blackthorn Road from 'E' to 'MH' reduces development opportunities. The only	V2046	1	The Manager supports the continuation of existing business across Sandyford Business District. Section 2.3.8 of the SUFP provides for the continuation, expansion and/or improvement of existing uses with an understanding that businesses/landowners are not necessarily intending on redeveloping their site in the short to medium term, if at all, and the need therefore, to continue and expand the existing business on site.
	development			It is considered that Section 2.3.8 'Existing Non Conforming Uses' could be reworded and strengthened for clarity

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opportunities available would be in partnership with Beacon Medical or private medical practitioner. To amend section 2.3.8 to include "Where owners and operators of existing nonconforming uses wish, due to economic requirements or for development opportunity to expand their current uses, they should be encouraged and supported irrespective of the current land use zoning".			purposes in order to allow for those areas/sites where existing business are operating successfully and which may wish to expand the existing uses into the future. Recommendation To amend Section 2.3.8 to read "2.3.8 Areas in Transition" "Within Sandyford Business District there are uses that do not conform to the Zoning Objectives of the area. The Council will support the expansion and/or improvement of existing non-conforming uses that are not considered likely to impact negatively on the development potential of adjoining sites in accordance with the policies and objectives set out in the Sandyford Urban Framework Plan."
2.3.7 Zone 7 Open Space			
(i) Vague statements for green spaces, proposals mostly re: The Reservoir and Benildus. Noted that these are not in the remit of DLRCC. The UFP lapses in 2016, therefore if there is no agreement between parties to develop them as public green spaces, there would be no new development. There is uncertainty as to whether the	V2008 V2019		Though the development of a park within the Reservoir lands may not materialise within the lifetime of this Plan, the Council is in contact with De La Salle Order in relation to acquiring use of their sports grounds adjoining the Council lands, to develop a park to cater for a wider range of both active and passive recreational activities. Recommendation No change to Variation No.2: SUFP

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	inclusion of St.Benildus and the decommissioned reservoir will happen in the lifetime of the Development Plan.			
(ii)	'F' zoning at Corrig Road inappropriate as to zone lands for residential use is contrary to CDP and open space to serve commercial at this location is inappropriate – more appropriate at Rockbrook and Beacon South Quarter amongst mixed use schemes – no consideration of the existing Plaza at Rockbrook for eg. and at the least more appropriately located centrally to the Carmanhall residential Neighbourhood.	V2038		The Rockbrook and Beacon South Quarter developments provide open space in accordance with the County Development Plan (CDP) standards at the time of permission. The CDP 2010-2016 had a specific objective SLO100 "to provide a civic square in Sandyford Business Estate to serve as an amenity for the whole county". The proposed civic park at Corrig Road is now what is proposed to meet that SLO. SLO100 is proposed to be deleted from the CDP and to be replaced with SLO119 "to develop a Sandyford Buisness District Park at the corner of Corrig Road and Carmanhall Road". The civic park is located at the pivotal Junction to Corrig Road and Carmenhall Road. It is considered that this location provides a sheltered, centralised high amenity open space between the core areas and the residential neighbourhood. An amenity space which would benefit both local residents and workers alike. The existing mature trees, which will form part of the park, enhance this location and the proposed shared surface, which will extend the public realm element of the site. The proposal to locate this park to the corner of Corrig Road and Blackthorn Road is not advisable as it would position the open space to the periphery of the existing and proposed residential communities and would front onto a busy road. Recommendation No change to Variation No.2: SUFP
(iii)	Opposed to any plan to concrete over reservoir, build on it or provide parking on it. Use of it as an open space could lead	V2010		The future covering over of part of the reservoir is required to meet drinking water standards. For clarity purposes drawing no. 10 referred to in section 4.3.1 and objective OS5 outlines the Councils objective in relation to developing part of the reservoir as active open space (Class 1). Due regard will be given in the design of the open space to insure there will be no over looking of houses.
	impact on privacy of adjacent housing at same or lower level			Recommendation Amend OS5 to include the above statement as follows: "It is an objective of the Council to actively pursue the use of the existing reservoir site as active open space (Class 1) when the use of part of this area as a reservoir is abandoned

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and anti-social behaviour. Drawing DRP1637 referred to pp.10/19 re: parkland on reservoir site was not located.			and the remaining part is covered over. Due regard will be given in the design of the open space to insure there will be no over looking of houses. This space will compensate for any future loss of the parklands at St. Benildus associated with the construction of the Eastern Bypass. (Drawing 10, A2)"
(iv) What is the percentage of green space in the estate and how do they compare to European best practice, as the existing levels are not good. (v) Amend SUFP Objective P1 to: It is an objective of the Council that no additional development (residential or commercial) will be permitted until either the land at St.Benildus or the Civic Park has been procured or made available for public use, and the lands at the reservoir is converted to Class 1 open space for public usage'.			Within a 1.5km radius of the plan area there is currently 36.29 ha of public open space. Best practice guidance for open space provision suggests that standards should be set locally and that is what the Framework Plan has set out to achieve. The Framework Plan has taken into account the fact that there are 7.4 ha of woodland at South County Business Park which are accessible to the public and that in such an urban context due regard must be given to the value of public realm and private open space such as courtyards and roof gardens for recreation and relaxation. 11.45 ha of open space (excluding the Reservoir lands and existing civic plazas) is provided for within the Sandyford Urban Framework Plan area in the form of Class 1 Open Spaces and pocket parks. This is greater than current County Development Plan standards for public open space and is devised to meet the needs of both the proposed employment and residential communities. This Plan and the open space provided addresses the increase in residential and employment population as a result of future growth in office based floor space of 350,000msq and the provision of an additional 1000 residential units. Recommendation No change to Variation No.2: SUFP
(vi) DLRCC must not depend on developers contributions to realise open spaces and must prepare to refuse planning applications to stop individual	V2022		The SUFP area differs to other areas in the County as the Council appreciates the need for it to identify Class 1 open space, and to acquire this space rather than fragmented open space being provided by individual landowners However, the cost of doing this will have to be covered by developers as it is in lieu of individual landowners providing Class 1 open space. Due to the fragmented landownership and the developed nature of the Sandyford Business Estates it is not realistic to expect useable /meaningful public open space to be formed through the culmination of percentages of each site.

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	sites/ developers deviating from or avoiding these requirements e.g. by contributions in lieu.			Accordingly key strategic locations for open space have been identified as set out in the Framework Plan. In addition it is an objective of the Council to prepare a levy scheme that covers the future cost of providing infrastructure that benefits the development of the area. Recommendation No change to Variation No.2: SUFP
(vii)	The maps are not consistent in that Map 1 shows the park over the south end of the road (partly over Block D) but the detailed park map shows it to the middle/ north end. Amend general map.	V2023		The maps are consistent. The specific location of the Pocket Park and it's design will form part of any redevelopment of this area. Recommendation No change to Variation No.2: SUFP
(viii)	'F' Zoning at Corrig Road will restrict the development potential of the site - nonconforming uses status. Delete F Zoning at Corrig Road. The Council sites at Corrig Road.(north end of Three Rock Road) and St.Benildus are more appropriate to open space. Rezoning land will devalue land and may require substantial compensation.	V2038 V2024 V2023	1	The civic park is located at the pivotal Junction to Corrig Road and Carmanhall Road; it is considered that this location provides a sheltered, centralised high amenity open space between the core areas and the residential neighbourhood. An amenity space which would benefit both local residents and workers alike. The existing mature trees, which will form part of the park enhance this location and the proposed shared surface, which will extend the public realm element of the site. The proposal to locate this park to the corner of Corrig Road and Blackthorn Road is not advisable as it would position the open space to the periphery of the existing and proposed residential communities and would front onto a busy road. Recommendation No change to Variation No.2: SUFP
(ix)	Site at 28 Corrig Road (occupied by Enable Ireland) more appropriate Zone 3 (office based	V2024	1	The civic park is located at the pivotal Junction to Corrig Road and Carmenhall Road, it is considered that this location provides a sheltered, centralised high amenity open space between the core areas and the residential neighbourhood. An amenity space which would benefit both local residents and workers alike. The existing mature trees, which will form part of the park enhance this location and the proposed shared surface, which will extend the public realm element of the site. The proposal to locate this park to the corner of Corrig Road and Blackthorn Road is not advisable

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	employment) having regard to current occupation.			as it would position the open space to the periphery of the existing and proposed residential communities and would front onto a busy road. This Plan was prepared having regard to land uses and setting. Individual landowners and operators were not a consideration for the Plan. While it is appreciated that Enable Ireland has specific requirements it is considered that there are a number of locations within Sandyford that may be able to satisfy these requirements. It is noted that this building is occupied but not owned by Enable Ireland. Recommendation No change to Variation No.2: SUFP
(x)	Inappropriately named Sports Ground at St Benidlus. To amend Plan to "Pairc Ui Bhriain and St Benildus Sports Ground/Naomh Olaf GAA Club Pitches". Remove reference to sports ground.	V2068	D5,6,7 & 14	The name "sports ground" appears on the maps and drawings in the SUFP as this is standard annotation on the Ordnance Survey Mapping. Typically parks are named after the town land in which they are located. It is proposed in the SUFP to name the public park Blackthorn Park. Recommendation No change to Variation No.2: SUFP
(xi)	To rezone land to Objective 'F' adjacent to Softco creates issue relating to land swaps required for pedestrian routes and subsequent car parking proposals Request that a strip of land immediately to the west of Softco site (see map) be zoned Objective 'OE'.	V2049	1	In order to facilitate the provision of a footpath link into South County Business Park which is considered to be a positive intervention which will improve permeability and links from the Luas, a land swap between IDA and Softco is required. The lands which are being offered to Softco in replacement for 'OE' zoned lands are zoned 'F'. It is therefore, considered appropriate to zone the 'F' zoned lands to 'OE' as this will not undermine the wooded area but will only improve permeability. Recommendation To zone a 10m wide strip of land (see map) for 'OE' Zone 3 (Map 1), plot ratio of 1:1.5 (Map 2) building height 2-5 storeys (Map 3).
(xii)	Expand the amount of green/open space provision and community facilities. Proposals are insufficient.	V2039 V2036 V2022 V2019 V2017	1	Within a 1.5km radius of the plan area there is currently 36.29 ha of public open. Best practice guidance for open space provision suggests that standards should be set locally and that is what the Framework Plan has set out to achieve. The Framework Plan has taken into account the fact that there are 7.4 ha of woodland at South County Business Park which are accessible to the public and that in such an urban context due regard must be given to the value of public realm and private open space such as courtyards and roof gardens for

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			recreation and relaxation. 11.45 ha of open space (excluding the Reservoir lands and existing civic plazas) is provided for within the Sandyford Urban Framework Plan area in the form of Class 1 Open Spaces and pocket parks. This is greater than current County Development Plan standards for public open space and is devised to meet the needs of both the proposed employment and residential communities. This plan and the open space provided addresses the increase in residential and employment population as a result of future growth in office based floor space of 350,000msq and the provision of an additional 1000 residential units. It should be noted that the SUFP puts great emphasis on the quality of open space as much as the quantity to be provided, particularly given the brown field nature of the Business District. Recommendation No change to Variation No.2: SUFP
(i) To include "Where owners and operators of existing non-conforming uses wish, due to economic requirements or for development opportunity, to enhance and expand their current uses, they should be encouraged and supported by the council irrespective of the current land use zoning". This shall provide for the amalgamation of adjoining properties.	V2046		The Manager supports the continuation of existing business across Sandyford Business District. Section 2.3.8 of the SUFP provides for the continuation, expansion and/or improvement of existing uses with an understanding that businesses/landowners are not necessarily intending on redeveloping their site in the short to medium term, if at all, and the need therefore, to continue and expand the existing business on site. It is considered that Section 2.3.8 'Existing Non Conforming Uses' could be reworded and strengthened for clarity purposes in order to allow for those areas/sites where existing business are operating successfully and which may wish to expand the existing uses into the future. Recommendation To amend Section 2.3.8 to read "2.3.8 Areas in Transition" "Within Sandyford Business District there are uses that do not conform to the Zoning Objectives of the area. The Council will support the expansion and/or improvement of existing non-conforming uses that are not considered likely to impact negatively on the development potential of adjoining sites in accordance with the policies and objectives set out in the Sandyford Urban Framework Plan."
(ii) The immediate effect of the proposed	V2018		For areas to change from existing low intensity uses to higher intensity uses zoning and plot ratio are the planning tools that bring order to where, what and the scale of development that should occur – without changing zonings it is

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zonings will transform legitimate uses on the land into non-conforming uses as they will conflict with the new zoning. Will only be permitted to promote expansion or improvement of existing use as long as not contrary to SUFP polices or neighbouring policies.			not possible to guide that future nature of the area in a manner that supports the rationale and purpose of the Plan. The Manager supports the continuation of existing business across Sandyford Business District. Section 2.3.8 of the SUFP provides for the continuation, expansion and/or improvement of existing uses with an understanding that businesses/landowners are not necessarily intending on redeveloping their site in the short to medium term, if at all, and the need therefore, to continue and expand the existing business on site. It is considered that Section 2.3.8 'Existing Non Conforming Uses' could be reworded and strengthened for clarity purposes in order to allow for those areas/sites where existing business are operating successfully and which may wish to expand the existing uses into the future. Recommendation To amend Section 2.3.8 to read "2.3.8 Areas in Transition" "Within Sandyford Business District there are uses that do not conform to the Zoning Objectives of the area. The Council will support the expansion and/or improvement of existing non-conforming uses that are not considered likely to impact negatively on the development potential of adjoining sites in accordance with the policies and objectives set out in the Sandyford Urban Framework Plan."
2.4 Scale and Density of different land uses			
(i) Development quantum should be a target not a limit to allow for the fact that not all zones will be brought forward for development.	V2059 V2058		The office development supply accords with the Regional Planning Guidelines for the GDA 2010-2022. The Infrastructure Capacity studies have shown that Sandyford Business District does not have the capacity to carry additional office based employment. Recommendation No change to Variation No.2: SUFP.
(ii) Development quantum constrained by transport factors. No regard had to innovative ways to encourage modal split. No quantum figures are available for other uses. No thought given to encouraging more traffic neutral uses.	V2069 V2070 V2071 V2073 V2010		The future development capacity of Sandyford Business District is based around Smarter Travel. By introducing innovative ways of encouraging multi modal transport infrastructure, Smarter Travel Targets and Mobility Management Plan objectives (Section 4.2), a future development quantum capacity has been achieved, without which future development of high intensity employment uses would be severely curtailed. The future development quantum is 350,000sqm of Office Based Development (as referred to in section 2.4.2). The SUFP allows for the development of other uses around Sandyford in accordance with the Land Use Zoning Policy (and Land Use Zoning Objectives Appendix 1 and Map 1) and Scale and Density and Building Height (sections 2.4, 2.5 and 3.2, Map 2 and 3). It should be noted that large-scale retail is a traffic generator and that the SUFP makes provision for small-scale retail development within a walking catchment. Recommendation

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				No change to Variation No.2: SUFP.
(iii)	The UFP should estimate (even with bounds) the current and desirable eventual population of residents and workers in Sandyford.	V2008		The background papers January 2011, (Planning Appendix 1 Key Assumptions) estimate a residential population of 9,090 for 2026 and 10,913 for 2030, based on assumptions that all permitted development including that proposed as part of the SUFP will be built out, and an employment population of 30,904 employees at 2016 and 43,404 employees at 2030, again based on the likely completion and occupation and permitted and future schemes. It is not considered that these estimates are required to be in included in the SUFP. Recommendation No change to Variation No.2: SUFP
(iv)	Over development of office space and residential units – why the need for a further 250,000sqm and 1,000 res units?	V2041		In respect to the proposed residential development of up to 1,000 units (that is 729 included in the traffic model and additional units available from expired residential permissions) it should be noted that the CDP 2010-2016 land use zoning objective 'E' and SLO 24 provided for residential development. The SUFP only attempts to rationalise the residential development and locate it into areas which will create sustainable neighbourhoods. The SUFP will form part of the CDP by way of Variation No.2. If adopted, the policies and objectives will form part of the CDP and will therefore not be contrary to the CDP. Recommendation No Change to Variation No.2: SUFP
(v)	Concern about growth capacity calculations – accounts for 100,000sqm of permissions not built.	V2069 V2070 V2071 V2072 V2047 V2031		The 100,000sqm of future office based development quantum referred to in Section 2.4.2 is actually the estimated quantum of floorspace likely to be available from existing occupied sites which now are likely to be redeveloped as part of the SUFP - not existing permissions yet to be built. The existing permissions in Sandyford are taken account of in the calculations for existing development. The 350,000sqm is as stated "over and above what is already permitted". Recommendation No Change to Variation No.2: SUFP
(vi)	Existing permissions/ incomplete sites within SUFP – many are due to expire. These may well apply for extension of duration	V2008 V2069 V2064 V2070 V2072 V2076		The issue of unfinished housing developments is not a matter, which can be dealt with in the context of the Sandyford Urban Framework Plan (Variation No. 2). Planning permissions generally have a life of 5 years and in some cases may be granted for periods up to 10 years. In addition the Planning and Development Act 2000 – 2010 makes provision for an applicant to apply to have their planning permission extended and the Council must consider any such application in accordance with the provisions of the Act.
	of permission. How will these be dealt with?	V2048		The Department of the Environment, Heritage and Local Government published the National Unfinished Housing Development Survey in October 2010. Prior to the publication of the DoEHLG survey, Dún Laoghaire-Rathdown

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SUFP requires policy statement on how these developments will be dealt with.			County Council had already set in train measures to address the issues arising from unfinished housing estates. All unfinished developments had been inspected by the Building Control Section of the Council and where concerns existed in relation to issues such as safety etc. contact had been made with the owner/developer to ensure that relevant action was taken. Since the completion of the National survey the Building Control Section has visited all 59 developments and is satisfied following these inspections that the majority of developments do not require ongoing monitoring by the Council. There are a number of developments which the Council is continuing to monitor in order to ensure that the developers are compying with their responsibilities under the Building Control Regulations and Health and Safety Legislation.
			Following the publication of the National Unfinished Housing Development Survey in October 2010 an Advisory Group on Unfinished Housing Developments was appointed by the Government to advise in relation to this matter. The Group published a draft Guidance Manual for Managing and Resolving Unfinished Housing Developments for public consultation in December 2010. The Department is currently reviewing submissions received in respect of the Draft and it is anticipated that the final Guidance Document will issue in the near future and the Council will actively seek to implement the recommendations in the Guidance Document.
			As the majority of permissions that are live have either started construction and/or form part of large, complex developments that are part of a master plan/overall development scheme, the SUFP makes provision for any such master plan/development schemes to be built out. (Note: any applications for extensions of duration of permission must also accord with any new provisions of the County Development Plan 2010-2016 (CDP) and any new applications for similar developments on sites where permissions expire, must accord with the other provisions of the SUFP and CDP).
			Recommendation No Change to Variation No.2: SUFP
(vii) Of those residential units included in the permitted development figures, some have now expired. (est. 500	V2037 V2060		The permissions for residential development that have expired are not included in the existing permission quantum. The traffic modelling allowed for 729 units which could be increased to 1,000 units because of the expired permissions. This site no longer benefits from the allocation of development quantum allowed by its previous permission, now expired.
units) Permitted residential development on lands at corner of			The office development supply accords with the Regional Planning Guidelines for the GDA 2010-2022. The Infrastructure Capacity studies have shown that Sandyford Business District does not have the capacity to carry additional office based employment.
Carmanhall Road/Blackthorn Road have been included in the existing permitted			The site is considered to be best located, on the edge of the proposed Carmanhall Residential Neighbourhood, to provide high density residential accommodation with community facilities at ground floor to animate Blackthorn Road at street level.

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	development quantum. A higher density mixed use scheme would therefore not add to the overall target quantum of development.			It is not just an issue of quantum of development, it is the right type of development in the right location to create the appropriate mix. - Mixed use in the cores to create a vibrant heart. - Residential in neighbourhoods to enhance residential amenity - High Intensity employment – in quality environment with good access to public transport and cores - Low Intensity at further edge of where there is an existing non-conformity of use Recommendation No change to Variation no.2: SUFP
(viii)	Restricting development potential on some sites and not on others is neither forward thinking or equitable. Many sites have already benefited from high-density developments, the current Plan is at odds with previous plans (2007 SUFP).	V2062		The Draft Sandyford Urban Framework Plan 2007 was never adopted by the Councillors nor approved by Management of Dun Laoghaire-Rathdown County Council and as such does not have a statutory basis. The Draft 2007 Sandyford Urban Framework Plan promoted mixed use high density development throughout SBD including on peripheral/edge sites. The Draft 2007 SUFP was assessed as an alternative scenario under the requirements of Strategic Environmental Assessment as Scenario 2 (Environmental Report Section 6.2.3) whereby the evaluation concluded that such a scenario would have adverse impacts (section 7.3.2 of the Environmental Report). These can be summarised as follows: Trip generation by private car would be likely to increase; the uptake in smarter travel, more sustainable modes of transport would be significantly less likely to be achieved; it would not provide for the consideration of infrastructural capacity needs with respect to water and drainage and the approach to building height would be likely to result in adverse residual impacts on residential amenity,; provides no clear rationale or definition of the meaning of Mixed Use Recommendation No change to Variation No.2: SUFP.
	nsity and Scale (plot			No change to variation No.2. 3011.
	es density)			
Genera (i)	Plot ratio should be expressed as gross floor area relative to site area and not vice versa as illustrated throughout SUFP e.g. 2.5:1 not 1:2.5. Please amend.	V2029	2	For the purpose of the Plan the plot ratio is calculated by the total floor area of the development/the total site area excluding public roads and future roads objectives. It is considered that Section 2.5.1 should be amended to clarify this point. Recommendation Density of development across the Plan areas calculated as follows: The ratio gross external floor area to plot size (plot size includes open space provision but excluding road schemes identified as Roads Objectives TAM 18, TAM 19, TAM 20) – plot ratio
(ii)	Maps 2 and 3 relating	V2032	2, 3	Maps 2 and 3 are not illustrative. They provide density and scale and height limits to ensure that development

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	to plot ratios/ residential densities are overly prescriptive and should be included in the 'drawings' section of the SUFP therefore to be guidance rather than statutory to allow for a variety of plot ratios which are site dependent.	V2045		Recommendation No change to Variation no.2: SUFP
(iii)	The plot ratio on Map 2 be amended to reflect existing plot ratio of 1:0.8 on the site.	V2033	2	The office development supply accords with the Regional Planning Guidelines for the GDA 2010-2022. The Infrastructure Capacity studies have shown that Sandyford Business District does not have the capacity to carry additional office based employment. Recommendation No change to Variation no.2: SUFP
(iv)	Density and plot ratio should be uplifted in areas that are required to provide Class 2 Open Space.	V2069,	2	All developments in Zones 1-5 are required to provide Class 2 Open Space (Objectives MC7, OE1, LIWI, A2 3, and MH1). The only likely reductions on % of Class 2 Open Space is within Zone 4, Light Industrial/Warehousing, due to the expected low ratio of workers to floor area (see Objective LIW1). The calculations for plot ratio include the total site area (including Class 2 open space). The provision of Class 2 open space, does not therefore result in a loss of development potential. It is considered that Section 2.5.1 should be amended to clarify this point. Recommendation Density of development across the Plan areas calculated as follows: The ratio gross external floor area to plot size (plot size includes open space provision but excluding road schemes identified as Roads Objectives TAM 18, TAM 19, TAM 20) – plot ratio
(v)	Plot ratios are mathematical calculations and are dependent on exact site boundaries and inclusion of roads,	V2050		To provide more flexibility in the plot ratios could result in the quantum of development available being exceeded. The plot ratios were calculated using the total site area, excluding the public roads and future roads objectives. Recommendation No Change to Variation No.2: SUFP

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ra	public spaces etc Plot atio in SUFP should be nore flexible.			
Central F Christ	Park/Legionaries of			
C p a s	The Legionaries of Christ site request a plot ratio of 1:2.5 and a proposed height of 6 stories be applied to he site	V2029	2	Plot ratio is considered appropriate and achievable to retain the Institutional Lands Objective on the site. The office development supply accords with the Regional Planning Guidelines for the GDA 2010-2022. The Infrastructure Capacity studies have shown that Sandyford Business District does not have the capacity to carry additional office based employment. Other locations, away from the periphery of the SBD, are considered to be more appropriate for higher plot ratios, in accordance with SMART travel and sustainable development. Recommendation No Change to Variation No.2: SUFP
South Co	unty Business Park			
(i) P S P b u b n c a a c ir 1 s S s o w tl	Plot ratio of 1:1.5 at South County Business Park is considered to be low and under utilisation of a land bank close to transport modes, with good connectivity, accessibility to services and infrastructure capacity. Seeks increased plot ratio of 1:2.5 (at Trintech ites) in support of sites) in support of support roads objective 2A on lands within their control in the context of increased plot ratio.	V2042 V2045	2, 3	Plot ratio is considered appropriate and achievable to retain the sylvan character of the Business Park. The office development supply accords with the Regional Planning Guidelines for the GDA 2010-2022. The Infrastructure Capacity studies have shown that Sandyford Business District does not have the capacity to carry additional office based employment. However, it should be noted that an error was made on Map 3 'Building Height' in respect to the proposed building height for this site. During the preparation of the SUFP a capacity of office based floor space was allocated to this site and as such an appropriate plot ratio is proposed. However, an error was made in so far as the existing building height of 2 storeys was allocated for this site instead of the proposed height of 5 storeys. The site area and plot ratio would allow for a building height of around 5 storey. As an example of scale and density, the Harbour Square complex in Dún Laoghaire has a plot ratio of 1:2.2 and Central Park has a plot ration of 1:2.9. Therefore, it is demonstrated that a plot ratio of 1:2.5 is too high to retain sylvan setting. Recommendation Amend Map 3 Building Height to show 'Proposed Building Height' of 5 storeys at site at the entrance to SCBP.

Key Iss	sue	Sub. No.	Map No.			
(ii)	The lands at Maple House, South County Business Park, should be allocated a plot ratio of 1:3 (on basis of 'OE' zoning) given proximity to Luas stop and recent high-density development.	V2059 V2058	2	In proposed Variation No.2:SUFP, lands in South County Business Park are zoned Objective 'A2' residential. These lands are adjacent to the Leopardstown Park Hospital, the Luas stop at Central Park and the core area at Central Park. The location provides an appropriate residential environment while having the added benefit of providing activity for those going to and from the Luas to the businesses located in South County Business Park. The IDA is clear in their submission that they do not agree with the residential zoning and request that the land be zoned Objective 'OE' Office Based Employment. The Manager is cognisant of the role of the IDA in attracting internationally trading businesses and having considered their submission and having regard to ER10 of the Regional Planning Guidelines for the Greater Dublin Area recommends a change to the SUFP by way of an additional Specific Local Objective. This Specific Local Objective would facilitate office based employment within the Residential Zoning at this location. The Manager considers that the zoning should not be altered so that an element of residential development is considered by the IDA in order to create activity in this area on what is a very important pedestrian route to Central Park Luas stop. In designing the layout of the site, cognisance should be given to the residential amenity of residents in the adjoining Central Park. Recommendation To amend Variation No.2:SUFP Appendix 2 Specific Local Objectives and Map 1 to include: SLO123: To facilitate the IDA in attracting internationally trading businesses office based employment will be considered on these lands to a similar plot ratio to that of the remainder of the South County Business Park. In preparing a Masterplan for the area regard should be given to providing activity along the route to the Luas and to the residential amenity of adjoining residents.		
(iii)	The lands at Marketing Institute South County Business Park, allocated res density of 70units per ha = 24 units – contrary to principles of sustainable development.	V2058	2	In proposed Variation No.2:SUFP, lands in South County Business Park are zoned Objective 'A2' residential. These lands are adjacent to the Leopardstown Park Hospital, the Luas stop at Central Park and the core area at Central Park. The location provides an appropriate residential environment while having the added benefit of providing activity for those going to and from the Luas to the businesses located in South County Business Park. The IDA is clear in their submission that they do not agree with the residential zoning and request that the land be zoned Objective 'OE' Office Based Employment. The Manager is cognisant of the role of the IDA in attracting internationally trading businesses and having considered their submission and having regard to ER10 of the Regional Planning Guidelines for the Greater Dublin Area recommends a change to the SUFP by way of an additional Specific Local Objective. This Specific Local Objective would facilitate office based employment within the Residential Zoning at this location. The Manager considers that the zoning should not be altered so that an element of residential development is considered by the IDA in order to create activity in this area on what is a very important pedestrian route to Central Park Luas stop. In designing the layout of the site, cognisance should be given to the residential amenity of residents in the adjoining Central Park.		

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			The entire site (Maple House and Marketing Institute) if developed for residential can provide in the region of 70 units at a height of up to 6 storeys. This density and scale of development would provide a transition between the higher density development of Central Park and the open areas of woodland, Leopardstown Hospital and South County Business Park.
			Recommendation To amend Variation No.2:SUFP Appendix 2 Specific Local Objectives and Map 1 to include:
			SLO123: To facilitate the IDA in attracting internationally trading businesses office based employment will be considered on these lands to a similar plot ratio to that of the remainder of the South County Business Park. In preparing a Masterplan for the area regard should be given to providing activity along the route to the Luas and to the residential amenity of adjoining residents.
Sandyford Business Estate			
(i) Re: ESB lands - Current zone 'E' is compatible with the site. Entire site should be Objective OE/Zone 3 and not LIW. To increase the plot ratio across the entire site to 1:1.5.	V2030	2	The ESB has raised the issue of zoning of part of their land for objective 'LIW' light industrial / warehousing for a set of reasons that are unique to the ESB. The existing ESB facility at Leopardstown Roundabout is an important piece of infrastructure as it accommodates the Distribution National Control Centre and the System Control and Data Acquisition (SCADA) operations centre. The submission from the ESB explains that this centre serves 200,000 people. The phasing of any redevelopment for future office accommodation will need to ensure that existing services are not disrupted. The ESB have made a strong argument based on the need to phase the redevelopment of their site and the parallel plans for development at Carrrickmines, that the lands on the western portion of their holding are those that they will be able to develop first. In addition to the argument for the change in zoning the ESB have argued that the plot ratio of 1:1.5 should be extended to their full land holding, this would increase their potential office floor area by circa 23,400sqm. This argument is based on an analysis done by ARUPS on the likely trips generated by the proposed floor area. Having considered this aspect of the submission, the Manager is confident that the modelling underpinning the Sandyford Urban Framework Plan is robust and that the basis on which ARUPS calculations were made differs to that used in the
			Council model and are not considered appropriate. The ESB have also argued that their site is at a gateway into Sandyford due to the future road scheme (six year road objective, number 6). The Plan has been consistent in its approach not to celebrate the periphery of the SBE by attributing higher densities, but by concentrating this capacity closer to multi modal access points and mixed use core areas. The argument made here by the ESB has been made by a number of submissions.
			The Manager having regard to the issues raised by the ESB and being cognisant of their strategic role as an energy supplier, network provider and distributor, considers that their argument in respect to the chronology in which their site can be developed is unique. The Manager considers it critical that the response to the issues raised is consistent

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			with the rationale underpinning the Plan and the overall potential for development in the area. The Manager understands from this submission that it is not feasible to redevelop the existing ESB buildings in the short to medium term due to the infrastructure they house and that the ESB has a strong argument to develop the western portion of their lands first. As set out in the Plan there is a finite capacity for office based employment in Sandyford and while the Manager does not propose to increase the overall quantum that the Plan generates, the Manager would recommend the redistribution of the Office Based employment zoned land across the ESB holding. This can be achieved by reducing the plot ratio in the area of the site where the existing buildings are located so that the existing low density ESB buildings can remain as is with potential for limited additional development, a plot ratio of 1:0.5 is recommended while the area to the west of the land holding is zoned for office based employment, objective 'OE' and given a plot ratio of 1:1.5.
			The overall result of these changes does not materially alter the overall floor area of office-based employment being facilitated in Sandyford Business District.
			Recommendation To amend Variation NO.2:SUFP as follows:
			• On land to the west of the ESB Link Road to Blackthorn Road (6 year road proposal), lands that are within the ESB holding (an area of land of circa 1.56ha), the zoning objective changes from Light Industrial Warehousing to Office based Employment Uses. The plot ratio of these same lands is increased from 1:1 to 1:1.5.
			 On lands to the east of the ESB Link Road to Blackthorn Road and South of the ESB Link Road to Arena Road (6 year road proposal), lands within the ESB holding (an area of land of circa 2.65 ha) the plot ratio of the land will be reduced from 1:1.5 to 1:0.5.
			 The lands to the west of the ESB Link Road to Blackthorn Road (6 year road proposal) that are zoned office based employment and that are located from the rear of the Eircom Lands to the Leopardstown Roundabout (an area of circa 1.85ha) the proposed building height limit be changed from a proposed building height limit of 2 storey height to a proposed building height limit of 5 storey height. Amend Drawing 11 to represent alterations to the ESB site.
(ii) SUFP should provide for a more appropriate urban edge i.e. a four storey building and		2	The office development supply accords with the Regional Planning Guidelines for the GDA 2010-2022. The Infrastructure Capacity studies have shown that Sandyford Business District does not have the capacity to carry additional office based employment.
plot ratio of 2.0 at strategically located site fronting Heather			Other locations, away from the periphery of the SBD, are considered to be more appropriate for higher plot ratios, in accordance with SMART travel and sustainable development.
Road and along entire of Heather Road - to reflect the future			The Plan's focus is not on creating gateways for landmark buildings, it is on creating focal points and a sense of place. Enhancing of access routes can be addressed by landscaping both hard and soft so as to improve vistas as one enters the area.

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key San	cus of this road as a route into adyford Business trict.			Recommendation No change to Variation No.2: SUFP
on to find the second s	end 1:2 plot ratio the eastern portion the Eircom site to . for a landmark ding. Proposed plot o inconsistent with tall building ective.	V2034	2	The office development supply accords with the Regional Planning Guidelines for the GDA 2010-2022. The Infrastructure Capacity studies have shown that Sandyford Business District does not have the capacity to carry additional office based employment. Recommendation No change to Variation No.2: SUFP
ration Black Hall site c.2h area afte ped rout Noti on have and regarders show that the store add	ify that the plot of at site on exthorn Ave/Burton I Ave (Ulster bank), relates to the full hat and not the net at for development er parks, estrian/ cycle tes and planting ing that other sites Blackthorn Ave. He plot ratios of 1:3 I :4 and having and to its prime at a stop, this site uld have a plot of 1:3 min with a ding height of five	V2013	2	The office development supply accords with the Regional Planning Guidelines for the GDA 2010-2022. The Infrastructure Capacity studies have shown that Sandyford Business District does not have the capacity to carry additional office based employment. The calculations for plot ratio include the total site area (including Class 2 open space). The provision of Class 2 open space, does not therefore result in a loss of development potential. It is considered that Section 2.5.1 should be amended to clarify this point. Recommendation Density of development across the Plan areas calculated as follows: The ratio gross external floor area to plot size (plot size includes open space provision but excluding road schemes identified as Roads Objectives TAM 18, TAM 19, TAM 20) – plot ratio

Key Iss	ue	Sub. No.	Map No.	Manager's Response & Recommendation
(v)	Residential density of 55-175 units will not enable the development of family housing – sufficient no. of apartments. (Most not constructed)	V2038	2	A varied residential density of between 55-175 units per hectare will provide a mix of family type housing. Residential units in SBD to date are generally 1 or 2 bedroom apartment type units therefore in the interest of providing a varied mix of housing types; it is proposed that the residential development at Carmanhall Road will consist of predominately own door access, family type units. Taller buildings are limited to the outer edge of the neighbourhood to provide enclosure to the centre. Recommendation No change to Variation No2: SUFP
(vi)	Lands at Corner of Carmanhall Road /Blackthorn Road should be allocated plot ratio of 1:3 given proximity to public transport and requested zoning to 'OE'	V2060	2	This site has a proposed Land Use Zoning Objective 'A2'. The site is considered to be best located, on the edge of the proposed Carmanhall Residential Neighbourhood, to provide high-density residential accommodation (175 units/ha) with community facilities at ground floor to animate Blackthorn Road at street level as proposed. It is not just an issue of quantum of development, it is the right type of development in the right location to create the appropriate mix. - Mixed use in the cores to create a vibrant heart. - Residential in neighbourhoods to enhance residential amenity. - High Intensity employment – in quality environment with good access to public transport and cores. - Low Intensity at further edge of where there is an existing non-conformity of use. The office development supply accords with the Regional Planning Guidelines for the GDA 2010-2022. The Infrastructure Capacity studies have shown that Sandyford Business District does not have the capacity to carry additional office based employment. Recommendation No change to Variation No2: SUFP
(vii)	Lands at corner of Bracken Road/Blackthorn Road – plot ratio should be increased from 1:0.5 to 1:2.5.	V2055	2	Having regard to the location of these sites and the acceptance of the site's position fronting Blackthorn Road it is considered that an increased plot ratio is warranted in accordance with the proposed building heights of 4 storeys. The SUFP identified a proposed building height of 4 storeys at this location. The plot ratio should have reflected this. This was a technical error. Recommendation To increase plot ratio from 1:0.5 to 1:2 fronting Blackthorn Road (at Furze/Heather/Bracken Road) Amend Map 2.
(viii)	Increase plot ratio on Gateway site on	V2057	2, 3, 1	Issue noted. It is agreed that the northern section of this site (Gateway site) could accommodate Medical uses having regard to the site's location, immediately adjacent to the proposed 'MH' Zone 6 and the site's ability to connect into

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	Bracken Road to 1:2.5 given its strategic location at a proposed entry point to Sandyford and proximity to Beacon Medical Campus.			the existing Beacon Medical Campus and complete the development block. Zoning alteration and height and plot ratio amendments can be made without affecting the overall infrastructure requirements in that the MH zoning objective requires the development to demonstrate that it will not add to peak hour traffic within the Sandyford Business District, subject to certain provisos. Recommendation Zone lands at northern section of "Gateway" site for 'MH' Zone 6 as per Map 1, amend plot ratio on Map 2 to 1:2.5 and amend Building Height on Map 3 to show 6 storeys.
(ix)	Object to plot ratio of 1:0.5 at Lands at no.47 Furze Road given plot ratios of 1:6 in 2007 SUFP.	V2062	2	The office development supply accords with the Regional Planning Guidelines for the GDA 2010-2022. The Infrastructure Capacity studies have shown that Sandyford Business District does not have the capacity to carry additional office based employment. The draft Sandyford Urban Framework Plan 2007 was never adopted by the Councillors nor approved by Management of Dun Laoghaire- Rathdown County Council and as such does not have a statutory basis. The lands at Furze, Heather and Bracken Roads are in the main to be considered peripheral/edge sites within Sandyford Business District. The 2007 Sandyford Urban Framework Plan promoted mixed use high density development within these areas. However, the 2007 SUFP was assessed as an alternative scenario under the requirements of Strategic Environmental Assessment as Scenario 2 (Environmental Report Section 6.2.3) whereby the evaluation concluded that such a scenario would have adverse impacts (section 7.3.2 of the Environmental Report). These can be summarised as follows: Trip generation by private car would be likely to increase; the uptake in smarter travel, more sustainable modes oft transport would be significantly less likely to be achieved; it would not provide for the consideration of infrastructural capacity needs with respect to water and drainage and the approach to building height would be likely to result in adverse residual impacts on residential amenity; provides no clear rationale or definition of the meaning of Mixed Use. Recommendation No Change to Variation No.2: SUFP
(x)	Building height is inconsistent with the plot ratios in the Plan. It would not be possible to achieve a plot ratio of 1:1.5 and height of 6 storeys on Avivia Lands (sites	V2065	2,3	In consideration of a looser building grain, different plot ratios, the proposed ESB link road, it is considered that a plot ratio of 1:1.5 would facilitate a building height of 6 storeys on the part of the site which is to the east of the proposed link road. It is agreed that on the part of the site immediately to the west of the proposed link road, a proposed height of 2 storeys is in consistent with the proposed plot ratio of 1:1.5. In that regard it is recommended to increase the height on the western part of the site (the section immediately to the west of the proposed link road only and not to include the site fronting Heather Road to the west) to 5 storeys in line with the proposals for the western part of the ESB site

Key Iss	sue	Sub. No.	Map No.	Manager's Response & Recommendation
	located west of Brookes Hardware), Heather Road. Plot ratio on western and eastern part of the site are inconsistent – plot ratio of 1:3 is appropriate.			Recommendation Amend Variation No.2:SUFP Map 3 Building Height to show a proposed building height of 5 storeys on the site immediately to the west of the proposed ESB link road (Six year Road Objective no.6). Site with proposed plot ratio 1:1.5.
(xi)	Landbank, including Febvre, Cannon/Spirit Motor group, Arena House and Bord Gais sites, proposed plot ratio of 1:2 will restrict development at this strategic location – may not be able to achieve 6 storeys as indicated on Map 3. 2-3 storeys and plot ratio 1:2 would create an imbalance in scale with neighbouring developments. Request Plot ratio of 1:3.	V2069	2, 3	The office development supply accords with the Regional Planning Guidelines for the GDA 2010-2022. The Infrastructure Capacity studies have shown that Sandyford Business District does not have the capacity to carry additional office based employment. The site is situated within an area, which seeks to promote a character area of medium density, high quality, and commercial pavilion type buildings set into a generous landscaped setting. Development would have a substantial setback from Blackthorn Drive and would take into account the existing Maretimo culvert. Individual ownership boundaries have not been followed and it in this regard together with the above that it is considered that a potential development height of 6 storeys is possible with appropriate buildings. Recommendation No change to Variation No.2: SUFP
(xii)	No rationale for plot ratio of 1:0.5 at AIB site and Sandyford Office Park given location adjacent to Luas – to extend plot ratio of 1:3 along entire Blackthorn Avenue.		2	The office development supply accords with the Regional Planning Guidelines for the GDA 2010-2022. The Infrastructure Capacity studies have shown that Sandyford Business District does not have the capacity to carry additional office based employment. Architects Recommendation No change to Variation No.2: SUFP
(xiii)	No rationale for plot	V2070	2	This site, cannot be viewed in isolation, it is one of a number of sites, which has potential to provide a coherent,

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	ratio of 1:1 and residential density of 70 units per hectare (resulting in 60 units) at Leopardstown Retail Park. Plot ratio and density provides no incentive to develop the site. To zone entire site Zone 3 with increased plot ratio.			attractive urban fabric by providing a mix of uses within the estate with its own character and identity. The location of these sites although located to the outer edge of the SBD offer opportunities to integrate the area into the fabric of the estate and adjacent area by providing new routes and connections. The SUFP proposes residential development of 2Ha. It is considered a 4 storey residential development would provide life and passive surveillance to the area and would benefit from the visual amenity of the Burton Hall lands whilst not impacting on the amenity of the protected structure. It is considered that the permitted / open for consideration uses and plot ratio are appropriate to provide all necessary local amenities at an appropriate scale. The office development supply accords with the Regional Planning Guidelines for the GDA 2010-2022. The Infrastructure Capacity studies have shown that Sandyford Business District does not have the capacity to carry additional office based employment. Recommendation No change to Variation No.2: SUFP
(xiv)	The plot ratio of 1:2 at FAAC site is restrictive at this strategic location. The level of accessibility to the Luas stop should be reflected in a plot ratio similar to those sites along Blackthorn Drive and Central Park - 1:3, to visually integrate with Central Park and as an incentive given the requirements to provide set backs, road infrastructure (Burton Hall Road extension) and open space.		2	This site is located to the outer edge of SBE and is viewed as being key in providing and reinforcing the connectivity between SBE & Central Park. Whilst the site is located on a busy road intersection it is also adjacent to 2 storey residential dwellings and overdevelopment of this site would seriously impact and overshadow these properties. With the provision of the Burton Hall link road onto Leopardstown Road, substantial set-backs and a Pocket park it is considered that a potential development height of up to 6 storeys is achievable. The office development supply accords with the Regional Planning Guidelines for the GDA 2010-2022. The Infrastructure Capacity studies have shown that Sandyford Business District does not have the capacity to carry additional office based employment. Recommendation No change to Variation No.2: SUFP
(xv)	To extend plot ratio of 1:4 to Ballymoss Road (to inc. Siemens site), equivalent to adjacent	V2073	2	It is envisaged that an Urban plaza will be provided at the Northern end of Ballymoss Road, therefore the Siemans site will facilitate and provide in partnership with the adjacent land owner and in consultation with DLR a high quality public realm in the form of an Urban Plaza. The Urban Plaza will in part fulfil each sites requirement under the open space provision. To note that each development site is required to provide 10-15% of open space. The calculations for

Key Iss		Sub. No.	Map No.	Manager's Response & Recommendation
	sites to north west, to achieve MC8, MC9 and SLO 109 and given the requirements under SLO121, PR7 and PR8. No rationale behind the plot ratio strategy.			plot ratio include the total site area (including Class 2 open space). The provision of Class 2 open space, does not therefore result in a loss of development potential. A plot ratio of 1:3 is considered to facilitate a development of an appropriate scale having regard to the sites strategic location whilst protecting the amenity of surrounding residential properties. The office development supply accords with the Regional Planning Guidelines for the GDA 2010-2022. The Infrastructure Capacity studies have shown that Sandyford Business District does not have the capacity to carry additional office based employment. Recommendation No change to Variation No.2: SUFP
(xvi)	Plot ratio of 1:3 on site at Ballymoss Road (Reservoir House) is considered appropriate, but should not be treated as overly prescriptive to enable schemes to exceed the plot ratio of required. Site along QBC – enhance accessibility.	V2050	2	Noted. A plot ratio of 1:3 is considered to facilitate a development of an appropriate scale having regard to the sites strategic location whilst protecting the amenity of surrounding residential properties. Recommendation No change to Variation No.2: SUFP
Stillor	gan Industrial Estate			
(i)	Low plot ratio at Holly Avenue are contrary to National and Regional Planning Guidelines, given the strategic location – revise to ensure rational pattern of development.	V2037	2	The office development supply accords with the Regional Planning Guidelines for the GDA 2010-2022. The Infrastructure Capacity studies have shown that Sandyford Business District does not have the capacity to carry additional office based employment. With the limited quantum available the SUFP seeks to utilise this quantum in areas / sites which would consolidate and enhance existing areas within the SBD. It is considered that Stillorgan Industrial Estate provides necessary lower intensity type employment uses and retains its own coherent character and identity which would be eroded with an increased plot ratio. Recommendation No change to Variation No.2: SUFP
(ii)	Plot ratio in Stillorgan	V2056	2	The office development supply accords with the Regional Planning Guidelines for the GDA 2010-2022. The

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Industrial Estate should be increased to 1:1.5 with higher limits of 1:2 at corner sites.		NO.	Infrastructure Capacity studies have shown that Sandyford Business District does not have the capacity to carry additional office based employment. With the limited quantum available the SUFP seeks to utilise this quantum in areas / sites which would consolidate and enhance existing areas within the SBD. It is considered that Stillorgan Industrial Estate provides necessary lower intensity type employment uses and retains its own coherent character and identity, which would be eroded with an increased plot ratio. Recommendation No change to Variation No.2: SUFP

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SECTION 3. URBAN FORM, PUBLIC REALM, LINKAGES AND BUILDING HEIGHT			
3.2 Building Height			
General			
(i) Re: Building height – it appears that certain sites should be selected for keynote buildings, maybe related to selected pocket parks or other open spaces, to provide visual and community focus and to establish the particular character of an area, and to probably be embellished by art works.	V2009	3	Significant buildings may be used to identify a place or focal point, signify an entrance, close a vista or create a skyline. The SUFP makes provision for a number of such buildings, for example, a significant building located adjacent to the Stillorgan Luas Stop would serve to identify arrival to the public transport use. It could act as a visual identification point for the Luas stop from within the Sandyford Business Estate and give presence to the civic space. A significant building located on the southeastern corner of Blackthorn Road would serve to close vistas in two directions and identify a key area within the Sandyford Business Estate. A vertically emphasised facade to the building located at the intersection between Burton Hall Road and Blackthorn Road could serve as a marker and an orientation point. Any such buildings shall accord with the Building Height Objectives BH1, BH2, BH3 and BH4 as amended. Recommendation No change to Variation No.2: SUFP
(ii) Construction criteria for high buildings should include requirements for energy audits. Heights not authorised above a point where the energy absorption increases beyond optimum.	V2009		Energy requirements within buildings shall be in accordance with DLR Development Plan Section 14.2 which highlights the Government commitment to a constant review of the Building Regulations (Technical Guidance Document L – Conservation of Fuel and Energy) the most recent of which was completed in 2008. The Building Regulations (Part L) are the main influence on standards of energy performance and carbon dioxide emissions for Ireland and in this regard the Council intends to use this statutory device to improve the overall energy efficiency and renewable energy performance of both new and existing buildings within the County. Dún Laoghaire-Rathdown is committed as a priority to encourage more sustainable development, the efficient use of energy and the use of renewables in new build and refurbishment projects throughout the County. The current nationally approved energy rating methodology and software should be used to certify new developments. Recommendation No change to Variation No.2: SUFP

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(iii)	Architectural quality of high buildings should be excellent as they are inherently obvious and give character to an area, and any proposal e.g. above eight stories should be assessed by three independent architects.	V2009	No.	The Manager is not in favour of independent studies. The County Council have professional staff to assess any such proposals. Any proposed developments are assessed in accordance with the requirements of the Planning and Development Act 2000-2010. Recommendation No change to Variation No.2: SUFP
(iv)	SUFP should be more flexible to allow for a variety of building heights which are site dependent.	V2045	3	The Building Heights shown on Map 3 are limits only and therefore do have a degree of flexibility (downward only). The building height of each proposal will be assessed, at planning application stage, based on its merits and site location in accordance with objectives BH2 and BH3. Building Heights are a limit not a target. Building Heights will be assessed in accordance with BH2; impact on surrounding environment, adjoining structures, open space etc. Recommendation No Change to Variation No.2 SUFP
(v)	Building height shall have due regard to residential properties bordering SBD: create transition zone 200-399m with max height of 4-5 storeys.	V2076 V2039 V2040 V2008 V2013 V2017 V2022 V2016	3	To provide a transitional zone of up to 399m from residential properties would result in a large swathe of Sandyford Business District being the subject of this transitional zone. Furthermore, it is difficult to understand why the author requires a transitional zone of between 200m-399m. Surely the concern is with regards to development within a close proximity to the residential properties. Consideration should perhaps be given to the Stillorgan LAP, whereby a transitional zone of 25m from residential estates was identified as an objective. All traditional residential estates surrounding Sandyford Business District are outside a 25 metre range of possible development (approximately 33-75metre distances)
		V2017 V2022 V2036		Further consideration has been given to the locations identified for additional height (BH3) over and above height limits. It is considered that 2 out of the 5 sites would have the greatest impact on residential amenity if developed with additional height (under Objective BH3), namely one site along Blackthorn Avenue (site 7, D14) and one site along Burton Hall Road (site 9, D14).
				Site 7 is important to its surrounding areas as it offers the potential to connect and link together a number of pedestrian routes, the most significant being a direct route from the Sandyford Luas stop to Burton Hall Road. It is envisaged that these routes and connection will be brought together around a centralised open space amenity. The development itself should reflect the status of the site, therefore a maximum building height of 5 storeys is considered appropriate for the site. While this reduces the height, it does not reduce the potential floor area of the building.
				Site 9, visually, is situated in a prominent location at the corner of Leopardstown Road traffic roundabout and opposing the eight storeys over podium Vodaphone building. The proposed development should be suitably

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			modelled adjacent to Woodford to limit overshadowing and it is considered that a maximum building height of 6 storeys is appropriate for this site.
			Given the distance of these sites from the Woodford estate (approximately 35m from the nearest resident) it is considered reasonable to omit the star symbol and provision for additional height under BH3 at these 2 locations. The resulting heights of 6 and 5 storeys are considered appropriate and in accordance with the proper planning and sustainable development of the area. It is also recommended that an objective be included that buildings at these locations, and all locations with star symbol shall be of a notable design given their prominent locations.
			A proposed benchmark height of 6 storeys for Blackthorn Avenue is considered appropriate in relation to the provision of a coherent long elevation to Blackthorn Avenue whilst having due regard to the protection of the residential amenity of neighbouring properties. It is considered that an additional height up to a maximum of 2 storeys on 2 sites along this elevation would animate the skyline slightly and identify significant routes into the heart of SBD. However, it is considered appropriate to amend BH3 for clarity purposes to read 'it is an objective of the Council to consider an element of the building at an additional height of 1-2 storeys over the height limits"
			Recommendation Remove the provision for additional height on sites 7 and 9 (D14) and respective star symbol on Map 3. To amend BH3 to read "It is an objective of the Council to consider additional heights over the height limits as indicated in locations identified on Map 3. On sites other than the Blackthorn Road site, increase in building height shall be limited to an element of the building at an additional height of 1-2 storeys over the height limit as indicated
			Include BH4 and annotate on Map 3, "Buildings at locations identified on Map 3 with "triangle" symbol shall be of notable design to mark its prominent location". Height limits shall accord with those shown on Map 3 and Building Height Objectives in Section 3.2 of the Plan.
			To amend Map 3 to include "triangle symbol at all locations with "star" symbol and the 2 locations where the "star" symbol is to be omitted.
			For clarity purposes text in Objective BH3 shall be amended to include "locations identified on Map 3, as annotated by a star symbol".
(vi) Building heights for permitted developments are copper fastened despite whether the development has been implemented. Several	V2048 V2050 V2010 V2008	3	The Building Heights shown on Map 3 are limits only. The building height of each proposal will be assessed, at planning application stage, based on its merits and site location in accordance with objectives BH2 and BH3. Building heights in the SUFP on sites where development is permitted (despite not being fully implemented) are in accordance with their permissions. These applications went through the planning process, which includes public consultation, and were considered to have an appropriate building height.

Key	Issue	Sub. No.	Map No.	Manager's Response & Recommendation
	existing landmark developments are totally out-of-character with general area and two storey houses and now further landmarks at 5 locations Developments should be considered on their merits.			Recommendation No Change to Variation No.2 SUFP
	dditional Height			
(i)	Support BH3.	V2042	3	Recommendation Remove the provision for additional height on sites 7 and 9 (D14) and respective star symbol on Map 3. To amend BH3 to read "It is an objective of the Council to consider additional heights over the height limits as indicated in locations identified on Map 3. On sites other than the Blackthorn Road site, increase in building height shall be limited to an element of the building at an additional height of 1-2 storeys over the height limit as indicated Include BH4 and annotate on Map 3, "Buildings at locations identified on Map 3 with "triangle" symbol shall be of notable design to mark its prominent location". Height limits shall accord with those shown on Map 3 and Building Height Objectives in Section 3.2 of the Plan. To amend Map 3 to include "triangle symbol at all locations with "star" symbol and the 2 locations where the "star" symbol is to be omitted.
(ii)	Amend BH3 – remove provision for additional height. Several existing landmark developments are totally out-of-character with general area and two storey houses and now further landmarks at 5 locations. Buildings shall be defined by notable design and	V2013 V2017 V2022	3, D14	Further consideration has been given to the locations identified for additional height (BH3) over and above height limits. It is considered that 2 out of the 5 sites would have the greatest impact on residential amenity if developed, namely one site along Blackthorn Avenue (site 7, D14) and one site along Burton Hall Road (site 9, D14). Given the distance of these sites from the Woodford estate (approximately 35m from the nearest resident) it is considered reasonable to amend BH3 and remove the provision of additional height at these 2 locations. The resulting heights of 6 and 5 storeys are considered appropriate and in accordance with the proper planning and sustainable development of the area. To include an objective that buildings at these locations and all locations with star symbol shall be of a notable design given their prominent locations. A proposed benchmark height of 6 storeys for Blackthorn Avenue is considered appropriate in relation to the provision of a coherent long elevation to Blackthorn Avenue whilst having due regard to the protection of the

Key	Issue	Sub. No.	Мар	Manager's Response & Recommendation
	character, not additional height.		No.	residential amenity of neighbouring properties. It is considered that an additional height up to a maximum of 2 storeys on 2 sites along this elevation would animate the skyline slightly and identify significant routes into the heart of SBD. However, it is considered appropriate to amend BH3 for clarity purposes to read 'it is an objective of the Council to consider an element of the building at an additional height of 1-2 storeys over the height limits" Recommendation Remove the provision for additional height on sites 7 and 9 (D14) and respective star symbol on Map 3. To amend BH3 to read "It is an objective of the Council to consider additional heights over the height limits as indicated in locations identified on Map 3. On sites other than the Blackthorn Road site, increase in building height shall be limited to an element of the building at an additional height of 1-2 storeys over the height limit as indicated Include BH4 and annotate on Map 3, "Buildings at locations identified on Map 3 with "triangle " symbol shall be of notable design to mark its prominent location". Height limits shall accord with those shown on Map 3 and Building Height Objectives in Section 3.2 of the Plan. To amend Map 3 to include "triangle symbol at all locations with "star" symbol and the 2 locations were the "star" symbol is to be omitted.
(iii)	Clarification required on Objective BH3 regarding sites on Blackthorn Road.	V2046	3	BH3 refers to sites identified on Map 3, as annotated by the star symbol - Additional heights over building height limit. There is one site identified by the star symbol on Blackthorn Road and at this location a building height of over 2 storeys above the height limit could be considered, subject to BH1 and BH2. Recommendation For clarity purposes text in Objective BH3 shall be amended to include "locations identified on Map 3, as annotated by a star symbol".
	pecific			
Sandy	ford Business Estate			
(i)	Main concerns are the proposed heights along Blackthorn Avenue and the impact on Lakelands residents in view of past appeals on height. Without exception	V2008	3	A proposed benchmark height of 6 storeys for Blackthorn Avenue is considered appropriate in relation to the provision of a coherent long elevation to Blackthorn Avenue whilst having due regard to the protection of the residential amenity of neighbouring properties. It is considered that an additional height up to a maximum of 2 storeys on 2 sites along this elevation would animate the skyline slightly and identify significant routes into the heart of SBD. However, it is considered appropriate to amend BH3 for clarity purposes to read 'it is an objective of the Council to consider an element of the building at an additional height of 1-2 storeys over the height limits

Key Issue		Sub. No.	Map No.	Manager's Response & Recommendation
reservoir fr to M.J. buildings to	Avenue along om Siemens Flood site be no higher storeys or			Recommendation For clarity purposes text in Objective BH3 shall be amended to include "locations identified on Map 3, as annotated by a star symbol".
specific of provide Heights O Height L symbol) of lands. T limitations of the gatewa the size of building h	nds include a bjective to 'Additional ver Building imit' (starn the ESB he height do not reflect y location or the site. A eight if 5 ald be applied ite.	V2030	3	The ESB has raised the issue of zoning of part of their land for objective 'LIW' light industrial / warehousing for a set of reasons that are unique to the ESB. The existing ESB facility at Leopardstown Roundabout is an important piece of infrastructure as it accommodates the Distribution National Control Centre and the System Control and Data Acquisition (SCADA) operations centre. The submission from the ESB explains that this centre serves 200,000 people. The phasing of any redevelopment for future office accommodation will need to ensure that existing services are not disrupted. The ESB have made a strong argument based on the need to phase the redevelopment of their site and the parallel plans for development at Carrrickmines, that the lands on the western portion of their holding are those that they will be able to develop first. In addition to the argument for the change in zoning the ESB have argued that the plot ratio of 1:1.5 should be extended to their full land holding, this would increase their potential office floor area by circa 23,400sqm. This argument is based on an analysis done by ARUPS on the likely trips generated by the proposed floor area. Having considered this aspect of the submission, the Manager is confident that the modelling underpinning the Sandyford Urban Framework Plan is robust and that the basis on which ARUPS calculations were made differs to that used in the Council model and are not considered appropriate. The ESB have also argued that their site is at a gateway into Sandyford due to the future road scheme (six year road objective, number 6). The Plan has been consistent in its approach not to celebrate the periphery of the SBE by attributing higher densities, but by concentrating this capacity closer to multi modal access points and mixed use core areas. The argument made here by the ESB and being cognisant of their strategic role as an energy supplier, network provider and distributor, considers that their argument in respect to the chronology in which their site can be d

Key	Issue	Sub. No.	Map No.	Manager's Response & Recommendation
				plot ratio of 1:0.5 is recommended while the area to the west of the land holding is zoned for office based employment, objective 'OE' and given a plot ratio of 1:1.5 .
				The overall result of these changes does not materially alter the overall floor area of office-based employment being facilitated in Sandyford Business District.
				Recommendation To amend Variation NO.2:SUFP as follows:
				 On land to the west of the ESB Link Road to Blackthorn Road (6 year road proposal), lands that are within the ESB holding (an area of land of circa 1.56ha), the zoning objective changes from Light Industrial Warehousing to Office based Employment Uses. The plot ratio of these same lands is increased from 1:1 to 1:1.5. On lands to the east of the ESB Link Road to Blackthorn Road and South of the ESB Link Road to Arena
				Road (6 year road proposal), lands within the ESB holding (an area of land of circa 2.65 ha) the plot ratio of the land will be reduced from 1:1.5 to 1:0.5. The lands to the west of the ESB Link Road to Blackthorn Road (6 year road proposal) that are zoned office based employment and that are located from the rear of the Eircom Lands to the Leopardstown Roundabout (an area of circa 1.85ha) the proposed building height limit be changed from a proposed building height limit of 2 storey height to a proposed building height limit of 5 storey height. Amend Drawing 11 to represent alterations to the ESB site.
(iii)	Sites along Blackthorn Road adjacent to Beacon Medical development should have height limits above 6 storeys to maintain the harmony of the block and allow for	V2046	3	The building height limit along Blackthorn Road, to the east of Beacon Medical and up to Bracken Road is 6 storeys. The proposed height is considered to create an appropriate transition between the adjacent permitted 6-9 storey building to the west and the building height limits of 4 storeys to the east. Recommendation No Change to Variation No.2 SUFP
	development to step down incrementally.			
(iv)	Building height should reflect the landmark quality of the location (at Eircom site) between axis of Luas to the north and	V2034		The Building Height objective BH3 allows for additional height here over and above the height limit of 6 storeys. A significant building located here, on the southeastern corner of Blackthorn Road would serve to close vistas in two directions and identify a key area within the Sandyford Business Estate. An additional objective is recommended to ensure that buildings at such locations shall be of a notable design given their prominent locations.
	Leopardstown roundabout to the south.			Changing the zoning from objective 'OE' to 'MOC' and increasing the plot ratio from 1:2 to 1:4 would erode a primary intention of the SUFP, which is to reinforce and consolidate the existing urban fabric and core areas within

Key	Issue	Sub. No.	Map No.	Manager's Response & Recommendation
	Introduce a Specific Objective for provision of a landmark building.			SBD. The SUFP within this subject site seeks to provide medium density, high quality, pavilion type commercial blocks with substantial roadway setback and landscaped setting to a maximum height of 6 storey's with a provision of an element of a building to be at an additional 2 storeys in height, at a strategic location. It is considered that the necessary parameters to achieve this are contained within the SUFP.
				Recommendation Include BH4 and annotate on Map 3, "Buildings at locations identified on Map 3 with "triangle" symbol shall be of notable design to mark its prominent location". Height limits shall accord with those shown on Map 3 and Building Height Objectives in Section 3.2 of the Plan.
				To amend Map 3 to include "triangle symbol at all locations with "star" symbol and the 2 locations were the "star" symbol is to be omitted.
(v)	Site 9 (FAAC) (on D14) heights of 7-8 storeys will overshadow, be imposing and devalue properties at Woodford. Should be capped at 4 or 5 storeys.	V2041 V2048 V2017 V2022	3, D14	The building height limits on sites (reference 9 on D14) opposing Woodford Estate is proposed at 6 storeys, with consideration of additional height of 1-2 storeys.
				Site 9 is situated in a prominent location at the corner of Leopardstown Road traffic roundabout and adjacent to the eight storeys over podium Vodaphone building. The proposed development should be suitably modelled adjacent to Woodford to limit overshadowing and it is considered that a maximum building height of 6 storeys is appropriate for this site.
				Given the distance of these sites from the Woodford estate (approximately 35m from the nearest resident) it is considered reasonable to omit the star symbol and provision for additional height under BH3. The heights of 6 storeys are considered appropriate and in accordance with the proper planning and sustainable development of the area. To include an objective that buildings at this location shall be of a notable design given its prominent location.
				Recommendation Remove the provision for additional height on sites 7 and 9 (D14) and respective star symbol on Map 3. To amend BH3 to read "It is an objective of the Council to consider additional heights over the height limits as indicated in locations identified on Map 3. On sites other than the Blackthorn Road site, increase in building height shall be limited to an element of the building at an additional height of 1-2 storeys over the height limit as indicated
				Include BH4 and annotate on Map 3, "Buildings at locations identified on Map 3 with "triangle" symbol shall be of notable design to mark its prominent location". Height limits shall accord with those shown on Map 3 and Building Height Objectives in Section 3.2 of the Plan.

Key	Issue	Sub. No.	Map No.	Manager's Response & Recommendation
				To amend Map 3 to include "triangle symbol at all locations with "star" symbol and the 2 locations where the "star" symbol is to be omitted.
(vi)	Site 7 (D14), proposed heights opposing Woodford estate will overshadow, be imposing and devalue properties at Woodford - shall be limited to 4 storeys.	V2048 V2041 V2017 V2022	3, D14	The building height limits on sites (reference 7 on D14) opposing Woodford Estate are proposed at 5 storeys, with consideration of additional height of 1-2 storeys. Given the distance of these sites from the Woodford estate (approximately 35m from the nearest resident) it is considered reasonable to omit the star symbol and provision for additional height under BH3. The heights of 5 storeys are considered appropriate and in accordance with the proper planning and sustainable development of the area. To include an objective that buildings at this location shall be of a notable design given its prominent location.
	illilited to 4 storeys.			-Site 7 is important to its surrounding areas as it offers the potential to connect and link together a number of pedestrian routes, the most significant being a direct route from the Sandyford Luas stop to Burton Hall Road. It is envisaged that these routes and connection will be brought together around a centralised open space amenity. The development itself should reflect the status of the site, therefore a maximum building height of 5 storeys is considered appropriate for the site.
				Recommendation Remove the provision for additional height on sites 7 and 9 (D14) and respective star symbol on Map 3. To amend BH3 to read "It is an objective of the Council to consider additional heights over the height limits as indicated in locations identified on Map 3. On sites other than the Blackthorn Road site, increase in building height shall be limited to an element of the building at an additional height of 1-2 storeys over the height limit as indicated
				Include BH4 and annotate on Map 3, "Buildings at locations identified on Map 3 with "triangle" symbol shall be of notable design to mark its prominent location". Height limits shall accord with those shown on Map 3 and Building Height Objectives in Section 3.2 of the Plan.
				To amend Map 3 to include "triangle symbol at all locations with "star" symbol and the 2 locations where the "star" symbol is to be omitted.
(vii)	Building Height should be amended to include "Building height along Blackthorn Avenue (sites 3 & 4 on D14) to be limited to 6 storeys, 21.5m".	V2048	3, D14	The sites along Blackthorn Drive are adjacent to the proposed Mixed Use Core Area and the facilities and services it provides and in close proximity to the proposed public transport interchange. As such and in accordance with the principles of sustainable development and with national and regional planning, these sites are considered appropriate for a development of a higher density. The strategies for the proposed scale and density and building height within this area were considered having due regard to these principles and guidelines and the likely impact on residential amenity. As such the plot ratios and building height limits are of the highest proposed for future development in the SUFP, but are at a significantly more moderate scale than more recently permitted

Key	Issue	Sub. No.	Map No.	Manager's Response & Recommendation
				developments in the vicinity. The sites are in excess of 70 metres from the nearest residential property, a significant distance to have any significant impact on residential amenity.
				Recommendation
(viii)	Height limit of 6 storeys at FAAC (Site 9) site not achievable with plot ratio of 1:2 and requirements for open space. Additional height objective to be added at the eastern corner (in light of requested increase in plot ratio) to reflect Vodaphone building.	V2071	3	No change to building height along Blackthorn Avenue or to BH3 at this location. This site is located to the outer edge of SBE and is viewed as being key in providing and reinforcing the connectivity between SBE & Central Park. Whilst the site is located on a busy road intersection it is also adjacent to 2 storey residential dwellings and overdevelopment of this site would seriously impact and overshadow these properties. With the provision of the Burton Hall link road onto Leopardstown Road, substantial set-backs and a Pocket park it is considered that a potential development height of up to 6 storeys suitably modelled to reduce its impact on the adjacent residential dwellings would be appropriate. It should be noted that it has been recommended to omit the "star" symbol at this location to take into account the concerns of residents and to include an objective that buildings at this location shall be of a notable design given its prominent location. Recommendation Remove the provision for additional height on sites 7 and 9 (D14) and respective star symbol on Map 3. To amend BH3 to read "It is an objective of the Council to consider additional heights over the height limits as indicated in locations identified on Map 3. On sites other than the Blackthorn Road site, increase in building height shall be limited to an element of the building at an additional height of 1-2 storeys over the height limit as indicated
(ix)	Site at junction of Blackthorn Avenue and Arkle Road (Tetrapak) is suitable for additional height over the building height limits given its position forming a vital part of gateway frontage in view from Upper Kilmacud Road. Suitable for a Landmark building	V2061	3	A location does not have to be marked by height to create a landmark. High quality architectural design can mark an area and/or view. The sites earmarked for additional height, to the west and east along Blackthorn Avenue are considered to be at a more pivotal location and as such it is proposed to allow for an element of the buildings to be higher here. This would have to be done sympathetically having regard to residential amenity. The Former Tetrapak site with a proposed building height of 6 storeys is considered appropriate in relation to the provision of a coherent long elevation to Blackthorn Avenue. Recommendation No change to proposed Variation No 2: SUFP
(x)	Remove restrictions of 4 storeys on building height	V2055	3	Development to the west and east is proposed at 6 storeys, directly to the north at 4-5 storeys, and to the south at 2 storeys. 4 storeys at this location is therefore considered appropriate.

Key	Issue	Sub. No.	Map No.	Manager's Response & Recommendation
	at junction of Bracken Road and Blackthorn Road and increase to 8 storeys.			Recommendation No change to Variation No.2: SUFP Map 3
(xi)	Object to building height limit of 2 storey at Lands at no.47 Furze Road, given neighbouring developments of 6 and 7 storeys.	V2062	3	The lands at Furze, Heather and Bracken Roads are in the main to be considered peripheral/edge sites within Sandyford Business District. The Draft 2007 Sandyford Urban Framework Plan promoted mixed use high density development within these areas. However, the Draft 2007 SUFP was assessed as an alternative scenario under the requirements of Strategic Environmental Assessment as Scenario 2 (Environmental Report Section 6.2.3) whereby the evaluation concluded that such a scenario would have adverse impacts (section 7.3.2 of the Environmental Report). These can be summarised as follows: Trip generation by private car would be likely to increase; the uptake in smarter travel, more sustainable modes of transport would be significantly less likely to be achieved; it would not provide for the consideration of infrastructural capacity needs with respect to water and drainage and the approach to building height would be likely to result in adverse residual impacts on residential amenity,; provides no clear rationale or definition of the meaning of Mixed Use . Recommendation
(xii)	Request a consistent building height of 6 storeys across entire Aviva Lands. No economic incentive to develop part of the site allocated for 2 storeys – would create problems in delivering key infrastructure.	V2065	3	In consideration of a looser building grain, different plot ratios, the proposed ESB link road, it is considered that a plot ratio of 1:1.5 would facilitate a building height of 6 storeys on the part of the site which is to the east of the proposed link road. It is agreed that on the part of the site immediately to the west of the proposed link road, a proposed height of 2 storeys is inconsistent with the proposed plot ratio of 1:1.5. In that regard it is recommended to increase the height on the western part of the site (the section immediately to the west of the proposed link road only and not to include the site fronting Heather Road to the west) to 5 storeys in line with the proposals for the western part of the ESB site to the south. Recommendation Amend Variation No.2:SUFP Map 3 Building Height to show a proposed building height of 5 storeys on the site immediately to the west of the proposed ESB link road (Six year Road Objective no.6). Site with proposed plot ratio 1:1.5.
(xiii)	Landbank, including Febvre, Cannon/Spirit Motor group, Arena House and Bord Gáis	V2069	3	The site is situated within an area, which seeks to promote a character area of medium density, high quality, and commercial pavilion type buildings set into a generous landscaped setting. Development would have a substantial set-back from Blackthorn Drive and would take into account the existing Maretimo culvert.

Key	Issue	Sub. No.	Map No.	Manager's Response & Recommendation
	sites warrants a landmark building – as deserving as the identified site to the west.			Individual ownership boundaries have not been considered. It is in this regard, together with the above, that it is considered that a potential development height of 6 storeys is possible with appropriate buildings. The site to the west, as referred, is considered appropriate for an element of a building to exceed the building height limit as such a building here would frame a view. Recommendation No change to Variation No.2 SUFP
(xiv)	Incoherent density and height strategy for AIB site along Blackthorn Avenue – 4 storey unobtainable with plot ratio of 1:0.5. Building on either side have a building height limit of 6 storeys rising to 7-8 storeys.	V2070	3	Buildings height limits to the north west are proposed at 6 storeys. The building height limits to the south east are 5 storeys. The line of buildings fronting Blackthorn Avenue will therefore provide for a gradual stepping down from the permitted 8 storeys to 4 storeys. Recommendation No change to Variation No.2 SUFP
(xv)	The 4 storey height of the proposed residential units at Leopardstown Retail Park does not tie in with the height strategy. Why should the height of the site fronting Burton Hall (commercial element) dip to 5 storeys?	V2070	3	The SUFP proposes residential development of 2 Ha. It is considered at 4 storey residential development would provide life and passive surveillance to the area and would benefit from the visual amenity of the Burton Hall lands whilst not impacting on the amenity of the protected structure. The height limits from Burton Hall Road across to Burton Hall Campus provide a stepping down of height in order to protect the status of Burton Hall. Recommendation No change to Variation No.2 SUFP
(xvi)	To revise height strategy for Siemens site to allow for height considerably higher than adjacent buildings to provide landmark building and given the requirements under SLO121, PR7 and PR8	V2073	3	The Siemens site is located in the middle of Blackthorn Avenue and the proposed building height of 6 storeys is considered appropriate in relation to the provision of a coherent long elevation to Blackthorn Avenue and having regard to the residential amenity of neighbouring properties. Whilst the site has been identified for potential additional height, it should be noted that given the sites open aspect to the Luas line, it is possible to provide a building form which would serve as a visual reference or orientation maker without using height alone. Recommendation No change to Variation No.2 SUFP

Key	Issue	Sub. No.	Map No.	Manager's Response & Recommendation
(xvii)	Restriction of 6 storeys at this corner site at Ballymoss Road (Reservoir House) would fail to utilise this key corner site. Height should be increased to 8-10 storeys to compliment adjoining sites.	V2050	3	The adjoining sites referred to which are notably higher are those which are already permitted development or have been implemented. All un-developed sites adjacent to Reservoir house, Royal College of Surgeons have a proposed plot ratio of 1:3 and a height limit of 6 storeys. The site to the south of the subject site has been incorrectly coloured on Map 3, in that it was given an existing height of 5-10 storeys. This should have been allocated a proposed height of 6 storeys to accord with the proposed plot ratio and adjoining properties. The Siemans site opposite to the subject site has been identified as a suitable location for additional height due to its strategic location at the intersection between Blackthorn Avenue / Drive and Kilmacud Road and between the proposed pedestrian routes of Ballymoss Road & the Rockbrook development. It is considered that the Urban plaza at the Northern end of Ballymoss Road is essential to reinforcing the main pedestrian route and an arrival point Via the Stillorgan Luas stop into the centre of SBD. The area within the site boundaries will be provided predominantly through the 10-15% open space requirement. Recommendation Amend Map 3, proposed Building Height to 6 storeys on site to south of Reservoir House (Ballymoss Road).
(xviii)	Increase building height at Gateway site given pivotal location.	V2057	3,2,1	Issue noted. It is agreed that the northern section of this site (Gateway site) could accommodate Medical uses having regard to the site's location, immediately adjacent to the proposed 'MH' Zone 6 and the site's ability to connect into the existing Beacon Medical Campus and complete the development block. Zoning alteration and height and plot ratio amendments can be made without affecting the overall infrastructure requirements in that the MH zoning objective requires that development shall demonstrate that it will not add to peak hour traffic within the Sandyford Business District, subject to certain provisos. Recommendation Zone lands at northern section of "Gateway" site for 'MH' Zone 6 on Map 1, amend plot ratio on Map 2 to 1:2.5 and amend Building Height on Map 3 to proposed building height of 6 storeys.
Stillor	gan Industrial Estate			
(i)	Building height limits at Holly Avenue are contrary to National and Regional Planning Guidelines, given the strategic location – increase height to ensure rational pattern of	V2037 V2053	3	With the limited quantum available the SUFP seeks to utilise this quantum in areas / sites which would consolidate and enhance existing areas within SBD. It is considered that Stillorgan Industrial Estate provides necessary lower intensity type employment uses and retains its own coherent character and identity. Recommendation No change to Variation No.2 SUFP

Key	Issue	Sub. No.	Map No.	Manager's Response & Recommendation
	development and insert BH3 at junction of Benildus Ave/Blackthorn Drive.			
(ii)	Building Height throughout Stillorgan Ind. Estate should be increased to 2-3 storeys with higher limits on corner sites.	V2056	3	With the limited quantum available the SUFP seeks to utilise this quantum in areas / sites which would consolidate and enhance existing areas within SBD. It is considered that Stillorgan Industrial Estate provides necessary lower intensity type employment uses and retains its own coherent character and identity. Recommendation No change to Variation No.2 SUFP
(i)	Site at Central Park is colour coded Brown 5-14 storeys and identified as permitted/developed. This is built out – no scope to comply with this.	V2048	3	For clarity, the sites fronting Leopardstown Road at Central Park are developed and as such appear on Map 3 as either "permitted/developed building height". The sites are coloured brown and have a height limit of 5-10storeys in accordance with what is actually built. Recommendation No change to Variation No.2 SUFP
South	County Business Bark			
(i)	Site at junction of South County Business Park (Trintech) appropriate location for taller buildings up to 8 storeys as it represents an edge and adjacent to key transport node with few likely impacts on residential amenity. Will support roads objective 2A on lands within their control in the context of additional height up to 8 storey.	V2042	3, D11, D14	During the preparation of the SUFP a capacity of office based floor space was allocated to this site and as such an appropriate plot ratio is proposed. However, a technical error was made in so far as the existing building height of 2 storeys was allocated for this site instead of the proposed height of 5 storeys. The site area and plot ratio would allow for a building height of around 5 storeys. This site should have also been identified on Drawing 11 with a future commercial building and included in site 12 on Drawing 14. Recommendation Amend Map 3 Building Height to show 'Proposed Building Height' of 5 storeys at site at the entrance to SCBP Amend Drawing 14 to include Trintech site in site 12. Amend Drawing 11 to include future commercial building.
(ii)	Development at Marketing Institute/Maple		3	In relation to massing & building heights the proposed development would act as a transition between the tall building of Central Park & the wooded area of South County.

Key	Issue	Sub. No.	Map No.	Manager's Response & Recommendation
	house will be dwafted by adjacent development at Central Park. Should be raised to 10 storeys.			It should be noted that under Section 2 of the Manager's Report it is recommended to include an additional SLO123 to allow for office based employment uses at this location. Recommendation No Change to Variation No.2: SUFP
3.3 Pu	blic Realm			
(i)	DLRCC should take direct responsibility for upgrading public realm and provide upgrades to movement network-cycle and pedestrian routes.	V2072	D6 & D10	It is appropriate that public realm shall be provided by DLRCC and developers alike. Objectives in respect to this are contained in Sections 3.4 Wayfinding, 4.3 Green Infrastructure, D10, D11 and Drawing 6 – cycle and pedestrian routes. Recommendation No Change to Variation No.2: SUFP
(ii)	PR8 requires the provision of Urban Plaza at end of Ballymoss Road. Omit this objective in light of plot ratio, as it would constrain development.	V2050 V2073	1, D10, D11	It is envisaged that a high quality public realm in the form of an Urban Plaza will be provided at the Northern end of Ballymoss Road, in partnership with both land owners and in consultation with DLRCC. The Urban Plaza will in part fulfill each sites requirement under the open space provision. The calculations for plot ratio include the total site area (including Class 2 open space). The provision of Class 2 open space, does not therefore result in a loss of development potential. It is considered that Section 2.5.1 should be amended to clarify this point. Recommendation Density of development across the Plan areas calculated as follows: The ratio gross external floor area to plot size (plot size includes open space provision but excluding road schemes identified as Roads Objectives TAM 18, TAM 19, TAM 20) – plot ratio
	sign Principles and			
Genera	ter Areas			
(i)	Flexible guidance required on mix of uses, densities, urban grain, enclosures and frontages, heights, movements and public realm. Drawing 11	V2070 V2071 V2072 V2073	D11	The contents page of the SUFP states "Maps and Drawings (Appendix 3)The Maps have a statutory basis within the County Development Plan 2010-2016. The Drawings are provided for reference and as a guidance for development". Drawing 11 whilst not being prescriptive does offer a potential vision for the future built form of SBD, a vision which incorporates the necessary design principles which if realised would create an attractive and coherent urban fabric to both live & work. In this regard alternative proposals would be welcomed and should be submitted for

Key	Issue	Sub. No.	Map No.	Manager's Response & Recommendation
	and Design Principles are considered too prescriptive. Guidance should take account of existing land ownership pattern.	V2050		consideration at pre-planning application stage. Recommendation No change to Variation No.2 SUFP
(ii)	To confirm that the suggested public spaces are diagrammatic only and that different designs for Urban Plazas will be considered.	V2073	D11	Drawing 11 whilst not being prescriptive does offer a potential vision for the future built form of SBD, a vision which incorporates the necessary design principles which if realised would create an attractive and coherent urban fabric to both live & work. In this regard alternative proposals would be welcomed and should be submitted for consideration at pre-planning application stage. Recommendation No change to Variation No.2 SUFP
(iii)	SUFP should address the treatment of unfinished developments and sites not yet started construction where the planning permitted may	V2008 V2017 V2019 V2022 V2036 V2039		The issue of unfinished housing developments is not a matter, which can be dealt with in the context of the Sandyford Urban Framework Plan (Variation No. 2). Planning permissions generally have a life of 5 years and in some cases may be granted for periods up to 10 years. In addition the Planning and Development Act 2000 – 2010 makes provision for an applicant to apply to have their planning permission extended and the Council must consider any such application in accordance with the provisions of the Act.
(iv)	Ambiguous policy statements to unfinished buildings. Please amend:	V2040		The Department of the Environment, Heritage and Local Government published the National Unfinished Housing Development Survey in October 2010. Prior to the publication of the DoEHLG survey, Dún Laoghaire-Rathdown County Council had already set in train measures to address the issues arising from unfinished housing estates. All unfinished developments had been inspected by the Building Control Section of the Council and where concerns existed in relation to issues such as safety etc. contact had been made with the owner/developer to ensure that relevant action was taken. Since the completion of the National survey the Building Control Section has visited all
(v)	'Section 2.2.2.1 Mixed Use Core Areas: Zone 1 and Zone 2 MIC – Mixed Use Inner Core Area Zone 1. It is an objective			59 developments and is satisfied following these inspections that the majority of developments do not require ongoing monitoring by the Council. There are a number of developments which the Council is continuing to monitor in order to ensure that the developers are compying with their responsibilities under the Building Control Regulations and Health and Safety Legislation.
	of the Council to consolidate and complete the development of the mixed use Inner Core to enhance and reinforce its sustainable development.(Map 1)			Following the publication of the National Unfinished Housing Development Survey in October 2010 an Advisory Group on Unfinished Housing Developments was appointed by the Government to advise in relation to this matter. The Group published a draft Guidance Manual for Managing and Resolving Unfinished Housing Developments for public consultation in December 2010. The Department is currently reviewing submissions received in respect of the Draft and it is anticipated that the final Guidance Document will issue in the near future and the Council will actively seek to implement these recommendations in the Guidance Document.
	Any existing unfinished			In relation to building height within unfinished sites, those sites that have existing permissions can build out the

Key	Issue	Sub. No.	Map No.	Manager's Response & Recommendation
	buildings be reduced to the 6 storey building height.		NO.	development in accordance with the building height approved as part of the permission. The majority of unfinished sites are at an advanced stage of construction and form part of an overall master plan/development scheme for an area. As such the SUFP facilitates these areas to be built at a height that accords with the existing permissions, either by way of an extension of permission under the requirements of the Planning and Development Act 2000-2010, as identified above, or by way of a new permission. Any new permission will however have to accord with the other policies and objectives of the SUFP and County Development Plan 2010-1016. Recommendation No Change to Variation No.2: SUFP
Site 3				
(i)	Development potential of site will be significantly reduced due to design principles and requirement for Urban Plaza – appropriate location for bookend/landmark feature building.	V2050	D14, D11	It is envisaged that a high quality public realm in the form of an Urban Plaza will be provided at the Northern end of Ballymoss Road, in partnership with the Siemans site (the adjacent land owner) and in consultation with DLRCC. The Urban Plaza will in part fulfill each sites requirement under the open space provision. The calculations for plot ratio include the total site area (including Class 2 open space). The provision of Class 2 open space, does not therefore result in a loss of development potential. The Siemans site opposite to the subject site has been identified as a suitable location for additional height due to its strategic location at the intersection between Blackthorn Avenue / Drive and Kilmacud Road and between the proposed pedestrian routes of Ballymoss Road & the Rockbrook development. Recommendation No Change to Variation No.2: SUFP
Site 6				
(i)	Landbank, including Febvre, Cannon/Spirit Motor group, Arena House and Bord Gais sites included in sites 6 & 10. Given extent of landbank – warrants its own site reference or meaningful description.	V2069	D11 & D14	The site is situated within an area, which seeks to promote a character area of medium density, high quality, and commercial pavilion type buildings set into a generous landscaped setting. Development would have a substantial set-back from Blackthorn Drive and would take into account the existing Maretimo culvert. Individual ownership boundaries have not been followed and it is in this regard together with the above that it is considered that a potential development height of 6 storeys is possible with appropriate buildings. Recommendation No change to Variation No.2: SUFP
Site 8				
(i)	Lands at Leopardstown Retail Park require set back for tree planting – unclear whether this is	V2070	D11, D14	Where Pocket Parks are identified within the Plan, the developer will be required also to provide suitable boundary treatment for the development, which may take the form of suitable set back, tree planting /boundary landscaping. This will not impact on the development quantum of the site, just on site coverage.

Key	Issue	Sub. No.	Map No.	Manager's Response & Recommendation
	10-15% (OE1) in addition to the pocket park (OS1 and SLO121).			For clarity purposes, the 10-15% open space requirement is the pocket park open space allocation, but this does exclude set backs, streetscapes and landscaping (as above). To amend, Section 2.3 Objectives MC7, OE1, LIW1, MH1 to include after "Class 2 communal open space for all development" text "excluding suitable boundary treatments, which may take the form of suitable set back, tree planting /boundary landscaping. Recommendation To amend, Section 2.3 Objectives MC7, OE1, LIW1, MH1 to include after "Class 2 communal open space for all development" text excluding suitable boundary treatments, which may take the form of suitable set back, tree planting /boundary landscaping.
Site 10)			
(i)	Landbank, including Febvre, Cannon/Spirit Motor group, Arena House and Bord Gais sites included in sites 6 & 10. Given extent of landbank – warrants its own site reference or meaningful description.	V2069	D11 & D14	The site is situated within an area, which seeks to promote a character area of medium density, high quality, and commercial pavilion type buildings set into a generous landscaped setting. Development would have a substantial set-back from Blackthorn Drive and would take into account the existing Maretimo culvert. Individual ownership boundaries have not been followed and it is in this regard together with the above that it is considered that a potential development height of 6 storeys is possible with appropriate buildings. Recommendation No change to Variation No.2: SUFP
Site 12	2			
(i)	Site 12: Amend text "Protect and enhance the existing sylvan setting and identity of the Park by maintaining the existing building typology and allowing appropriately redeveloped high quality architecturally designed buildings of freestanding medium density developments or point blocks set into a landscape settings".	V2042	D14	The text is considered to be satisfactory to achieve the objective and SLO115. Recommendation No change to Variation No.2 SUFP

Key Issue	Sub. No.	Map No.	Manager's Response & Recommendation
Site 13 (i) Committed to providing open space at Central Park, but require clarification that the open space shown on drawings 10 and 11 are indicative.	V2052	D14, D10, D11	For clarity, Drawings 10 and 11 provide an illustrative vision and concept for the future development of Sandyford Business District that is in accordance with the policies and objectives set out in the SUFP. Any future permissions for the completion of Central Park will be required to provide open space in accordance with the Land Use Policy SUFP1 and objectives in Section 1 (under Objective 'OE') and the Open Space Policy SUFP8 and Objectives in Section 4 of the SUFP and have regard to the parent permission which identified an open space area which is yet to be provided. Recommendation
Zone 4 Light Industrial Warehousing			No change to Variation No.2 SUFP
(i) An existing abrupt transition in character/uses between light industrial area of Stillorgan Industrial Estate and commercial area along Blackthorn Road. SUFP does not address this.	V2053		With the limited quantum available the SUFP seeks to utilise this quantum in areas / sites which would consolidate and enhance existing areas within SBD. It is considered that Stillorgan Industrial Estate provides necessary lower intensity type employment uses and retains its own coherent character and identity. Recommendation No change to Variation No.2 SUFP

Key Issue	Sub.	Мар	Manager's Response & Recommendation
	No.	No.	
SECTION 4. INFRASTRUCTURE			
General			
(i) Dept. Communications Energy & Natura Resources has no comment at this time bu without prejudice to this the comments of the Inland Fisheries Ireland are that: - the IFI has no observations to make or the variation.			Recommendation No change to Variation No.2: SUFP
(ii) Concerns regarding the shortage of basic infrastructural systems such as water, sewage etc, but still allowing 250,000sq.m of development. Ensure adequate capacity issue regarding infrastructure is addressed before any further large-scale development is allowed.	2 V2036 V2076 V2039 V2040 F V2041 V2008		The SUFP is based on ensuring adequate capacity of infrastructure including water and drainage infrastructure as outlined in Section 1.6.1 "Rationale underpinning the SUFP" and in Section 4: Infrastructure which includes a number of objectives to provide for and/or facilitate the provision of Environmental Infrastructure (Water and Drainage), Multi Modal Transport Infrastructure (Public Transport/cycling and walking interventions, Smarter Travel Targets, Mobility Management Planning, Parking and Roads) and Community Infrastructure (Open space, Education and Community Facilities). The Plan also includes Policy SUFP12 "It is Council policy to ensure the orderly development of Sandyford Business District by the phasing of future development around the key delivery of infrastructure" Recommendation No change to Variation No.2: SUFP
(iii) The SUFP shall note that where the development of a landholding is not dependent on proposed infrastructure, permissions shall be considered.	t t t		Further development in Sandyford is reliant on the provision of the new infrastructure identified. The council requires some level of certainty regarding the deliverability of this infrastructure prior to additional development being permitted. Recommendation No change to Variation No.2: SUFP
4.1 Environmental Infrastructure			

Key	Issue	Sub. No.	Map No.	Manager's Response & Recommendation
(i)	Still believe there is a significant water supply and foul drainage infrastructure gap in the wider estates, which should be addressed before any more development is granted. The 2010 Dublin water shortages highlight this.	V2017 V2019 V2022		The SUFP is based on ensuring adequate capacity of infrastructure including water and drainage infrastructure as outlined in Section 1.6.1 "Rationale underpinning the SUFP" and in Section 4: Infrastructure which includes a number of objectives to provide for and/or facilitate the provision of Environmental Infrastructure (Water and Drainage), Multi Modal Transport Infrastructure (Public Transport/cycling and walking interventions, Smarter Travel Targets, Mobility Management Planning, Parking and Roads) and Community Infrastructure (Open space, Education and Community Facilities). This issue has been addressed by the phasing of infrastructure and future development. The Plan includes Policy SUFP12 "It is Council policy to ensure the orderly development of Sandyford Business District by the phasing of future development around the key delivery of infrastructure."
(ii)	Suggests an additional phased objective as follows:			Recommendation No change to Variation No.2: SUFP
(iii) (iv)	'P10 It is an objective of the Council that no additional developments shall be permitted to commence until significant new and upgraded foul sewer infrastructure for the estates is in place, and the additional water main into Zone A is in place'.			
(v)	SWD 2 to be amended to include tanking systems, where other Suds options are not available.	V2042		Applications will be assessed in accordance with SWD2. Recommendation No change to Variation No.2: SUFP.
(vi)	Confidence is required in the water supply and pressure in the area.	V2048		This issue is addressed in the phasing of development under Section 5. Recommendation No change to Variation No.2: SUFP
(vii)	FD3 requires stringent measures at pre-	V2050		This is required to ensure the capacity of infrastructure is properly utilised.

Key	Issue	Sub.	Мар	Manager's Response & Recommendation
		No.	No.	
4.0.14	application stage – should be reconsidered to be less restrictive.			Recommendation No change to Variation No.2: SUFP
	ılti Modal Transport			
	tructure n 4.2.1			
(i)	Proposed 250,000sqm of offices and 1,000 no. units of residential, however there are no figures available on quantum for other uses.	V2009 V2010		Employment is the primary contributor to peak hour journeys with the main employment type for future development being office type employment. The 250,000sqm is based on development contributing to peak period commuting trips (mainly office). A quantum of residential was included as a portion of those working in the area may also live in the area and this has a beneficial effect for peak traffic. Trips by other development types are considered not to significantly contribute to peak period trips. Recommendation No change to Variation No.2: SUFP.
(ii)	Welcome mixed land use objectives and proposed high density development closer to LUAS stops. This policy demonstrates best practice integration of land use and transportation planning.	V2020		Noted Recommendation No change to Variation No.2: SUFP
(iii)	Welcome identification of LUAS stops as key destinations for way finding.	V2020		Noted Recommendation No change to Variation No.2: SUFP
(iv)	Extend zoning objective (Office based Employment Uses) across the entirely of the ESB site. Advises that the difference is of the order of 115 two-way trips during the AM peak hour (or 2 trips per minute) and that this is not a significant addition.	V2030		The ESB has raised the issue of zoning of part of their land for objective 'LIW' light industrial / warehousing for a set of reasons that are unique to the ESB. The existing ESB facility at Leopardstown Roundabout is an important piece of infrastructure as it accommodates the Distribution National Control Centre and the System Control and Data Acquisition (SCADA) operations centre. The submission from the ESB explains that this centre serves 200,000 people. The phasing of any redevelopment for future office accommodation will need to ensure that existing services are not disrupted. The ESB have made a strong argument based on the need to phase the redevelopment of their site and the parallel plans for development at Carrrickmines, that the lands on the western portion of their holding are those that they will be able to develop first. In addition to the argument for the change in zoning the ESB have argued that the plot ratio of 1:1.5 should be extended to their full land holding, this would increase their potential office floor area by circa 23,400sqm. This

Key Issue	Sub.	Мар	Manager's Response & Recommendation
	No.	No.	
			argument is based on an analysis done by ARUPS on the likely trips generated by the proposed floor area. Having considered this aspect of the submission, the Manager is confident that the modelling underpinning the Sandyford Urban Framework Plan is robust and that the basis on which ARUPS calculations were made differs to that used in the Council model and are not considered appropriate.
			The ESB have also argued that their site is at a gateway into Sandyford due to the future road scheme (six year road objective, number 6). The Plan has been consistent in its approach not to celebrate the periphery of the SBE by attributing higher densities, but by concentrating this capacity closer to multi modal access points and mixed use core areas. The argument made here by the ESB has been made by a number of submissions.
			The Manager having regard to the issues raised by the ESB and being cognisant of their strategic role as an energy supplier, network provider and distributor, considers that their argument in respect to the chronology in which their site can be developed is unique. The Manager considers it critical that the response to the issues raised is consistent with the rationale underpinning the Plan and the overall potential for development in the area. The Manager understands from this submission that it is not feasible to redevelop the existing ESB buildings in the short to medium term due to the infrastructure they house and that the ESB has a strong argument to develop the western portion of their lands first. As set out in the Plan there is a finite capacity for office based employment in Sandyford and while the Manager does not propose to increase the overall quantum that the Plan generates, the Manager would recommend the redistribution of the Office Based employment zoned land across the ESB holding. This can be achieved by reducing the plot ratio in the area of the site where the existing buildings are located so that the existing low density ESB buildings can remain as is with potential for limited additional development, a plot ratio of 1:0.5 is recommended while the area to the west of the land holding is zoned for office based employment, objective 'OE' and given a plot ratio of 1:1.5.
			The overall result of these changes does not materially alter the overall floor area of office-based employment being facilitated in Sandyford Business District.
			Recommendation To amend Variation NO.2:SUFP as follows:
			 On land to the west of the ESB Link Road to Blackthorn Road (6 year road proposal), lands that are within the ESB holding (an area of land of circa 1.56ha), the zoning objective changes from Light Industrial Warehousing to Office based Employment Uses. The plot ratio of these same lands is increased from 1:1 to 1:1.5. On lands to the east of the ESB Link Road to Blackthorn Road and South of the ESB Link Road to Arena Road (6 year road proposal), lands within the ESB holding (an area of land of circa 2.65 ha) the plot ratio of the land will be reduced from 1:1.5 to 1:0.5.
			The lands to the west of the ESB Link Road to Blackthorn Road (6 year road proposal) that are zoned office based employment and that are located from the rear of the Eircom Lands to the Leopardstown

Key	Issue	Sub. No.	Map No.	Manager's Response & Recommendation
				Roundabout (an area of circa 1.85ha) the proposed building height limit be changed from a proposed building height limit of 2 storey height to a proposed building height limit of 5 storey height. • Amend Drawing 11 to represent alterations to the ESB site.
(v)	No thought seems to have been given to encouraging more traffic neutral uses within SBD.	V2069 V2070 V2071 V2073		The development quantum of 350,000sqm identified is for development of a type that generates peak hour trips by private car, which in the SBD is primarily office type. From a transportation perspective no specific limits have been placed on development that does not generate or contribute to peak period trips by private car. There is also a strong emphasis on sustainable travel in the SUFP as part of the Mobility Management Plan, Walking and Cycling and Public Transport Strategies. Recommendation
				No change to Variation No.2: SUFP
(vi)	Concern over status of permitted development not yet constructed, which according to section 2.4.2 accounts for 100,000 of the 350,000sqm of additional	V2069 V2070 V2071 V2072		The further 350,000sqm of development is composed of 250,000sqm over and above that already permitted to date plus 100,000sqm arising from redevelopment of existing sites, i.e. existing development that will be removed and replaced. In the traffic modelling study any development that had already been permitted but not yet constructed or occupied was included along with existing development, and considered in effect to be the same as existing development. Recommendation
	development designated for the SBD.			No change to Variation No.2: SUFP
(vii)	Requests a change in the land use zoning on a strip of land immediately west of the SoftCo site from Open Space to Office based employment uses in order to facilitate land swap that accommodates the provision of a new	V2047 V2075		This change in land use zoning will facilitate land swaps necessary to achieve some of the SUFP objectives regarding the provision of green routes. Recommendation The strip of land circa 10 metres wide to the immediate west of the SoftCo site in South County Business Park should be rezoned as office based employment Objective 'OE' Zone 3.
	LUAS pedestrian access to South County Business Park.			
(viii)	The well publicised shortage of basic	V2076		The infrastructure necessary for further development has been addressed in the SUFP as part of the phasing plan.
	infrastructure systems			Recommendation
	should be addressed			No change to Variation No.2: SUFP

Key	Issue	Sub. No.	Map No.	Manager's Response & Recommendation
	before any further large scale development is allowed.			
Smart	er Travel			
(i)	Inappropriate to set targets for year 2020 when the SUFP timeframe is 2016.	V2045		The mode split targets set by the SUFP for 2016 apply to the additional development only and not to existing. The County Development Plan 2010-2016 policy T2 is to promote, facilitate and co-operate in securing the implementation of the 'Smarter Travel – A Sustainable Transport Future 2009-2020' to effect a modal shift from the private car to more sustainable modes of transport. Targets will be monitored as part of the Mobility Management Plan on an ongoing basis and updated if necessary. Recommendation
				No change to Variation No.2: SUFP
(ii)	The modal split objectives, linked to Smarter Travel Objectives, are strongly supported.	V2004		Comments and support noted. Recommendation No change to Variation No.2: SUFP
(iii)	Smarter travels targets are set for 2020 and not for 2016. Different targets should be set for different parts of the Sandyford Business District. New development in Sandyford Business District should aim for targets well in excess of Smarter Travel Targets for future development in the area			Comment noted. Smarter Travel aims for higher targets to be achieved in Urban Areas by 2020. The period for the SUFP is up to 2016. Targets will be monitored as part of the Mobility Management Plan on an ongoing basis and updated if necessary. The majority of the Sandyford Business District is within walking and cycle distance of a Luas Station or Bus Stop Recommendation No Change to Objective TAM1 in the SUFP
(iv)	The strategy adopts quite high targets for reduction in car use, with quite limited initiatives that	V2043		Issue noted and considered. DLR is also in discussion with the Quality Bus Network Office about the implementation of the Bus proposals as part of the Public Transport Strategy.

Key Issue	Sub. Map	Manager's Response & Recommendation
	No. No.	
would drive such a change in behaviour. The emphasis attached to road infrastructure is noticeable. While there seems to be a clear understanding of the quantum of development that can be supported by specific road infrastructure proposals, the same clarity is not evident in relation to mobility management and public transport infrastructure. The plan identifies a number of objectives in relation to both mobility management and public transport neither of this type of category objectives are brought through, to any significant degree to the phasing and funding section. It is difficult to accept that a 45% car mode share target can be achieved without significant investment in public transport and mobility management. The absence of these measures from the phasing and funding	-	The Manager recommend the following phasing objective. Recommendation The following changes to Variation No.2: SUFP. Phasing Objective P10 It is an objective of the Council that satisfactory progress should be made with the implementation of the Public Transport, Walking & Cycling and Mobility Management Planning Objectives in tandem with phasing objectives P2, P3 and P4.

Key	Issue	Sub. No.	Map No.	Manager's Response & Recommendation
(v)	The sustainable transport initiatives in the SUFP need to be considerably stronger to deal with not only future, but also existing traffic to deliver the ambitious mode share target for private car.	V2043		We note NRA comments regarding the proposed sustainable transport initiatives. The plan identifies measures to benefit and encourage greater use of sustainable travel modes including the bus/LUAS interchange, Quality Bus Corridors, internal and feeder buses, area wide mobility management plans (outcome based), the Bus Rapid Transit 'Blue Line', upgrade and additional facilities for pedestrians and cyclists, motor cycle parking, traffic calming and management measures including shared surfaces and a 30km/h zone, measures to constrain car parking and a civic park and plaza. Planning is only one tool to implement Smarter travel. Smarter Travel identifies other measures to achieve targets. Recommendation No change to Marietian No 20 CUED.
Dublic	Transport			No change to Variation No.2: SUFP
(i)	A comprehensive free minibus should radiate out from these entry points. TAM3 and TAM4 go part of the way towards meeting this objective, but are not sufficiently comprehensive.	V2009		An internal shuttle bus service is included as an objective in TAM4. Public transport strategy aims to give greater priority to buses in the area and endeavours to create new bus services for the area linking to the Dart and other areas. Recommendation No change to Variation No.2: SUFP.
(ii)	RPA note proposal for LUAS /Bus interchange and welcome and support any integration of LUAS with other public transport services; however for these to work there has to be buyin from all operators.	V2020		Recommendation No change to Variation No.2: SUFP
(iii)	Support Objective TAM2 LUAS/Bus interchange along Blackthorn Avenue.	V2020 V2050		Support noted. Recommendation No change to Variation No.2: SUFP
(iv)	Public transport in the area is poor.	V2009		Public transport strategy aims to give greater priority to buses in the area and endeavours to create opportunities for new bus services for the area linking to the Dart and other areas. DLR will work with Dublin Bus and Quality Bus Network Project Office to facilitate the provision of bus services to and from the area during peak commuting periods.

Key	Issue	Sub. No.	Map No.	Manager's Response & Recommendation
				Recommendation No change to Variation No.2: SUFP
(v)	Welcome in principle the proposed shuttle bus between Blackrock DART and Stillorgan LUAS	V2020		Support noted. Recommendation No change to Variation No.2: SUFP
(vi)	The proposed phasing of development is dependent on improvements to the road network rather than the enhancement of the existing public transport network	V2050		The road infrastructure proposed is the minimum deemed necessary to facilitate the 45% peak hour trips by car arising from the additional development, albeit at a level of network performance that is predicted for 2016. Recommendation No change to Variation No.2: SUFP
(vii)	Objective should be included for an express bus service from Wicklow along M50 to the area. The journey from Bray by Dart to Blackrock onto Sandyford too slow	V2023		The Public transport strategy aims to give greater priority to buses in the area and endeavours to create a new fast and frequent bus service for the area linking to the DART at Blackrock. This service opens up public transport as an option to the hinterland of the DART from Greystones to Malahide and from further a field via the intercity and commuter rail services. The public transport strategy also includes the development of a route and service from Tallaght to Sandyford and Dun Laoghaire thus providing another link to the Dart line. TAM5 sets out the council's objective regarding the BlueLine BRT (Bus Rapid Transit) service from St. Vincents Hospital to Sandyford providing integration between DART, bus and Luas services. The County Development Plan 2010-2016 policy T6 includes the Luas line B2 extension to Fassaroe and Bray. Recommendation No change to Variation No.2: SUFP.
(viii)	Public Transport Interchange - The RPA supports, in principle, the development of the proposed bus /Luas interchange at the Stillorgan Luas	V2020		Support noted. Recommendation No change to Variation No.2: SUFP.
(ix)	Main transport routes should only be	V2009		The proposed road hierarchy for the Sandyford Business District is shown on drawing No. 7. The future aim for the Sandyford Business District is to create lower speeds thus creating a more cycle and pedestrian friendly

Key Issue	Sub. No.	Map No.	Manager's Response & Recommendation
Drummartin Road, Leopardstown Road, Blackthorn Road, Blackthorn Drive, and Benildus Avenue. Other routes should be limited to public transport, taxis, ambulances, delivery vehicles and licensees.			environment as per Objective TAM7. Limiting traffic to certain routes only will result in many access difficulties for those working, living, visiting or making deliveries to the area. Recommendation No change to Variation No.2: SUFP.
Cycle and Walking			
Six-year Objectives Cycling			
and Walking (Access)			
(i) Residents of Leopardstown Lawn object to the provision of a pedestrian and cycle link along the Old Harcourt Street Railway Line for the reasons including: - privacy, security, construction and structural impacts, increased traffic and demand for on-street parking (due to proximity to Luas), light pollution, wildlife, noise and anti- social behaviour. (see also Appendix 2).	V2002 V2003 V2007 V2011 V2014 V2015 V2021		The Manager appreciates the concerns of the residents. This new green route represents a significant enhancement in both pedestrian and cycling infrastructure for the area and will resolve the existing severance issues experienced by non-motorised users wishing to access the Sandyford area and the LUAS and particularly those who currently have no option but to pass through the Leopardstown Roundabout. The Old Harcourt Street Railway Line and the playing field are in the control of the Council. Proposed scheme will undergo a separate planning approval process (possibly under Part 8) at which time any specific issues relating to the design of the scheme can be appropriately considered. Recommendation No change to Variation No.2: SUFP.
Objectives Cycling and Walking			
(i) The RPA supports the provision of improved pedestrian routes in the area and the proposed pedestrian crossing at the Sandyford Luas stop.	V2020		Support noted. Recommendation No change to Variation No.2: SUFP.

Key	Issue	Sub. No.	Map No.	Manager's Response & Recommendation
realm movem	should take direct sibility for upgrading public and provide upgrades to the network -cycle and rian routes.	V2072	D6 & D10	Objectives contained in section 3.4 Wayfinding, 4.3 Green Infrastructure, D10, D11 and Drawing 6 – cycle and pedestrian routes. Recommendation No change to Variation No.2: SUFP
Mobili	ty Management			
(i)	Commend proposal to prepare an area wide Mobility Management Plan. Requests details of framework, scale, form of engagement, scope and deadline for delivery of the Mobility Management Plan.	V2020		Details to be included in the Mobility Management Plan. Recommendation Text for Objective TAM 9 to be amended as follows: - 'It is an objective of the Council to prepare an area wide mobility management plan for Sandyford Business District in conjunction with stakeholders in the area and in consultation with the National Transport Authority.
(ii)	The NTA welcomes the proposal for the preparation of an area wide Mobility Management Plan which can assist in achieving sustainable transport objectives. The inclusion of a provision to prepare this plan in consultation with the NTA is requested.	V2054		Details to be included in the Mobility Management Plan. Recommendation Text for Objective TAM 9 to be amended as follows: 'It is an objective of the Council to prepare an area wide mobility management plan for Sandyford Business District in conjunction with stakeholders in the area and in consultation with the National Transport Authority.
(iii)	Plan contains limited initiatives to drive change in travel behavior.	V2043		Delivery of public transport and walking and cycling in tandem with Mobility Management Plan will provide greater travel choice for those working in the area. This will help influence travel habits of those working in the area. Recommendation No change to Variation No.2: SUFP.
(iv)	A commercial area is not a suitable location for a school due to the potential traffic hazard.	V2037		Safety issues and traffic hazards will be addressed during pre-planning stage including set down areas etc. Any application for a school will require a School Mobility Management Plan to promote access to the school by sustainable travel modes.

Key	Issue	Sub. No.	Map No.	Manager's Response & Recommendation
				Recommendation No change to Variation No.2: SUFP.
Parkin	ıg			
(i)	Adequate visitor multi- storey parking should be established at entry points, e.g. LUAS stations, St. Benildus Park, ESB Lands.	V2009		A considerable number of parking spaces exist in the area as part of permitted development, on-street parking or park and ride, which provide for visitor parking. Recommendation No change to Variation No.2: SUFP.
(ii)	All LUAS stations should have adequate park and ride facilities. At present facilities at Stillorgan and Sandyford are inadequate and there are none at Kilmacud.	V2009		Park and ride for cars and bikes already exist at Sandyford and Stillorgan Luas stops. Policy T7 of the County Development plan states that "It is Council policy to facilitate the provision of Park and Ride in appropriate locations along strategic transport corridors", allowing for further park and ride to be developed subject to planning. All day park and ride already exists at the Kilmacud Luas Stop along the Drummartin Link Road and a park and ride is permitted at Priorsland. To further promote the Sandyford Business District as a park and ride destination would increase the peak hour trips entering the area, which would impact on the future quantum of development. Therefore a further expansion of the park and ride in Sandyford Business District has not been included in the SUFP as it has been adequately provided for in Policy T7. Recommendation No change to Variation No.2: SUFP.
(iii)	Clarification requested for TAM16 regarding the use of excess spaces.	V2023		Objective TAM16 refers to the provision of alternative sustainable travel or other measures to facilitate the provision of lower parking quantum in a development. It can also refer to the leasing of car parking spaces in other development to facilitate lower parking quantum for a particular development. Recommendation No change to Variation No.2: SUFP.
(iv)	The NTA recommend an area based approach to car parking standards for the entire Sandyford Business District and recommends that the maximum car parking standards for the area	V2054		Objectives TAM13 to TAM17 refer to a possible reduction in the provision of car parking for particular developments where alternative sustainable travel modes or other measures to facilitate the provision of a lower parking quantum are provided. In particular Objective TAM16 can also refer to the leasing of car parking spaces in other developments to facilitate lower parking quantum for a particular development. The current car parking standards were adopted in April 2010 as part of the County Development Plan 2010-2016. In the current County Development Plan car parking standards have been changed from minimum to maximum parking standards. In addition, separate car parking standards are included for development along public transport

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	should not exceed the DLR County Development Plan 2010-2016 car parking standards for designated areas along public transport corridors. This will help control congestion in the local and wider environs and encourage access by noncar modes.			corridors. In formulating the standards, reference was made to other car parking standards in the Greater Dublin Area and to UK best practice. In addition, the car parking standards also required the provision of spaces for charging of electric vehicles (e.g. 10% office) and 4% for disabled persons. There is scope existing within the County Development Plan to reduce car-parking quantum for any development. Recommendation The following changes to Variation No.2: SUFP. Additional Car Parking Objective to be included after TAM 17: - It is an objective of the Council that the maximum car parking standards for the entire Sandyford Business District will not exceed the Dún Laoghaire-Rathdown County Development Plan 2010-2016 car parking standards for designated areas along public transport corridors and more restrictive standards may apply at appropriate locations".
(v)	Restricting car parking provision can have a positive impact on reducing car dependence, while not restricting the growth potential of the area.	V2069 V2070		The current car parking standards were adopted in April 2010 as part of the County Development Plan 2010-2016. In the current County Development Plan car parking standards have been changed from minimum to maximum parking standards. In addition, separate car parking standards are included for development along public transport corridors. In formulating the standards, reference was made to other car parking standards in the Greater Dublin Area and to UK best practice. In addition, the car parking standards also required the provision of spaces for charging of electric vehicles (e.g. 10% office) and 4% for disabled persons. There is scope existing within the County Development Plan to reduce car-parking quantum for any development. Objectives TAM13 to TAM17 refer to a possible reduction in the provision of car parking for particular developments where alternative sustainable travel modes or other measures to facilitate the provision of a lower parking quantum are provided. In particular Objective TAM16 can also refer to the leasing of car parking spaces in other developments to facilitate lower parking quantum for a particular development.
				Recommendation The following changes to Variation No.2: SUFP. Additional Car Parking Objective to be included after TAM17 - "It is an objective of the Council that the maximum car parking standards for the entire Sandyford Business District will not exceed the Dún Laoghaire Rathdown County Development Plan 2010-2016 car parking standards for designated areas along public transport corridors and more restrictive standards may apply at appropriate locations".
(vi)	The movement network within the Sandyford	V2031		Scope exists within the County Development Plan and in the Area Wide Mobility Management Plan to promote sustainable travel modes and reduce car-parking quantum for any development.

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Business District should be based on sustainable travel modes with car parking standards reduced, restrictions on cars entering the Sandyford Business District and traffic neutral uses.	No.	No.	Recommendation No change to Variation No.2: SUFP.
Roads			
General (i) The plan should contain an objective to; Produce an express bus service from Wicklow on the M50, Improve the Bray Bypass and, Provide a ramp from the M50 northbound to the Southern Roundabout. (ii) The plan must address traffic congestion and provide a quick direct	V2023 V2026		 It is not within the remit of the Council to provide the bus service suggested. The improvement of the Bray Bypass is not specifically required to facilitate the future development of Sandyford. The traffic model analysis has concluded that the northbound route to Sandyford via the Sandyford Interchange and the Drummartin Link Road operates with a satisfactory level of performance. The M50 junction 14 provides one northbound and one southbound exit. Recommendation No change to Variation No.2: SUFP The transportation vision for the Sandyford Business Estates is to create a 'sustainable travel community' with a strong sense of identity that provides quality of life to the people who live and work in the area, ensuring that development occurs at a pace where it is supported by sustainable transport choices. The future focus will be on
route from the motorway to the N11 without roundabouts or traffic lights. (iii) 'Temporary' turn restrictions were imposed along Leopardstown Road and Lawn for the M50 construction. The 'Plan' should restore these turns.			access to the area by sustainable travel modes rather than by car. Recommendation No change to Variation No.2: SUFP.
(iv) Request that an	V2029		As stated on page 2 of the draft plan - "The Maps have a statutory basis within the County Development Plan 2010-

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	additional access arm be illustrated serving the Legionaries of Christ Lands onto the roundabout proposed for the Murphystown Link Road, with corresponding amendment to drawing 9.			2016. The Drawings are provided for reference and as a guidance for development." The drawing is included to indicate the route feasibility. The proposed scheme will undergo a separate planning approval process at which time any specific issues relating to the design of the scheme can be appropriately considered. Recommendation No change to Variation No.2: SUFP.
(v)	Legionaries of Christ are not opposed to proposed objectives, which pass through their lands, subject to appropriate compensation.	V2029		Noted Recommendation No change to Variation No.2: SUFP.
(vi)	Recognise that the roads objectives are critical in facilitating future development in the Sandyford Area.	V2029		Noted Recommendation No change to Variation No.2: SUFP.
(vii)	The plan should promote the development of traffic management measures to reduce the potential for traffic congestion and associated vehicular emissions within the plan area.	V2051		Objective TAM1 requires vehicular access to all future development to be constrained to the modal split of 45% trips by private car (maximum) as per Government Policy published by the Department of Transport, 'Smarter Travel, A Sustainable Transport Future 2009-2020'. There is a strong emphasis in the plan on sustainable travel and road safety and providing for all road users. Recommendation No change to Variation No.2: SUFP.
(viii)	Welcomes the infrastructure improvement works proposed under the SUFP.	V2072		Noted Recommendation No change to Variation No.2: SUFP.
(ix)	Supportive of Road upgrade proposals in general.	V2052		Noted Recommendation No change to Variation No.2: SUFP

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(x) Road proposal No. 2B & 10 would be seriously detrimental to the completion of Central Park (inc. provision of open space) and not feasible.	V2052	D9	It is recognised in the Transportation Background Paper that the links No.2b and 10 are more problematic to deliver in terms of land costs, construction costs and planning constraints. It was subsequently determined that these schemes could be eliminated from the short-term 6-year objectives without unduly effecting the road network performance, by the addition of SLO 122. However, they are retained as long-term objectives in the plan so that their implementation may be included for consideration at some point in the future. Recommendation No change to Variation No.2: SUFP.
(i) 1. Seems to be no estimate of vehicle density in public documentation. 2. Recommend internal restrictions. Main transport routes should be based on Drummartin Road, Leopardstown Road, Blackthorn Avenue, Blackthorn Drive and Benildus Avenue. Other routes should be limited to public transport, taxis, ambulances, delivery vehicles and licensees.	V2009		 Traffic Modelling report has been made available on the DLR website with the background papers and includes predicted traffic figures at main junctions and the M50 interchanges. Traffic modelling analysis concluded that the existing road network would not facilitate any further additional development beyond that already permitted to date. The proposed road hierarchy for the Sandyford Business District is shown on drawing No. 7. The future aim for the Sandyford Business District is to create lower speeds thus creating a more cycle and pedestrian friendly environment as per Objective TAM7. Limiting traffic to certain routes only will result in many access difficulties for those working, living, visiting or making deliveries to the area. Recommendation No change to Variation No.2: SUFP.
(ii) M50 Diverge ramp access and Bracken Road could provide a self-sufficient traffic cell from the Furze Road/ Heather Road/ Bracken Road area, which could support a much higher quantum of development than is identified in the SUFP, and with a minimal impact on other traffic	V2031		The traffic modelling analysis carried out for Sandyford, based on the identified additional infrastructure, indicated the maximum development quantum that can be accommodated and are included in the SUFP. Recommendation No change to Variation No.2: SUFP.

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	cells.			
(iii)	Support for roads objectives	V2042 V2052		Support noted. Recommendation No change to Variation No.2: SUFP.
(iv)	The transport measures identified relate and emphasises the provision of road infrastructure and the use of the private car for commuting. The plan is heavily reliant on traffic interventions.	V2043 V2069 V2070		Of the 20 transport objectives in the SUFP, 3 relate to Road objectives while the majority of the others refer to the implementation of sustainable travel proposals as outlined in the Background paper as part of the Walking and Cycling and Public Transport Strategies and on the promotion of sustainable travel. The road infrastructure proposed is the minimum deemed necessary to facilitate the 45% peak hour trips by car arising from the additional development, albeit at a level of network performance that was predicted for 2016, in the event that no further development or road infrastructure would be implemented. Therefore the SUFP neither seeks to improve the road capacity beyond facilitating 45% trips from the additional development nor the network performance level above that predicted for 2016 with no further additional development. Recommendation No change to Variation No.2: SUFP.
(v)	Given the proposed amendments to the Leopardstown Roundabout, the possibility of providing an alternative southbound exit onto the M50 from South County Business Park should be explored.	V2045		As this would likely require a motorway order and would essentially be a private access onto the Motorway it is unlikely that the NRA would support such a proposal. Refer to the NRA document 'Policy Statement on Development Management and Access to National Roads'. Recommendation No change to Variation No.2: SUFP.
(vi)	Questions whether the proposed Objective LIW zoning and related very low density standards are appropriate at the Sandyford Gateway at Beacon Court lands in that they may hinder the viability and efficient delivery of the Bracken	V2057	1	Zoning alteration and height and plot ratio amendments can be made without affecting the overall infrastructure requirements in that the MH zoning objective requires that the development shall demonstrate that it will not add to peak hour traffic within the Sandyford Business District, subject to certain provisos. Recommendation Zoning of northern section of Sandyford Gateway site to be changed from LIW Light Industrial / Warehousing (Zone 4) to MH Medical (Zone 6) on Map 1. To amend Map 2, Plot Ratio to 1:2.5 and Map 3 Building height to 6 storeys.

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	Road Extension.			
(vii)	Requested to reconsider the alignment of the link between the ESB roundabout and Blackthorn Road having regard to the existing use of the Aviva Investors owned lands.	V2065		Plan advises in section 5 that the alignment has not been finalised and that the critical factor is the connection between the ESB Roundabout, Arena Road and Blackthorn Road. Also, the proposed scheme will undergo a separate planning approval process (possibly under Part 8) at which time any specific issues relating to the design of the scheme can be appropriately considered. Recommendation No change to Variation No.2: SUFP.
(viii)	Development of lands accessing onto Arena Road are entirely dependant on the provision of roads infrastructure (i.e. ESB and Arena Road Links) that will not result in any significant improvement to the traffic situation within the SBD, "therefore suggest that Phasing Policy 9 be removed."	V2069		A traffic model scenario was run with the ESB and Arena Road Link removed. The analysis of the output indicated that network performance was not significantly adversely affected provided that all nine other road schemes were put in place. Four of the schemes that were considered more problematic to deliver in terms of land costs, construction costs and planning constraints were removed and the ESB and Arena link retained, as this road link has a dual role in providing access to development of this land and to the SBD as a whole. Recommendation No change to Variation No.2: SUFP.
(ix)	Support for proposed alterations to the Leopardstown Roundabout.	V2072		Support noted. Recommendation No change to Variation No.2: SUFP.
(x)	NRA see a number of practical difficulties in implementing the M50 Junction 14 Diverge Ramp Access to Heather Road (No.1): Ramp is part of the motorway so a motorway	V2043		There is an existing problem with queuing on this exit ramp. It is considered that an additional relief road is necessary in order to satisfactorily resolve this problem and to ensure that it does not re-occur with future occupancy of permitted and future development. It is the preference of the Council to provide this relief road, as previously suggested by the NRA, as a free-flow slip to the ESB link road. However the access to Heather Road is retained at this point as a secondary option if for some reason the ESB link proves impossible to deliver. Hence this scheme is included, as a reserve option in the six-year road objectives if for any reason the ESB link road does not proceed.
	order under the Roads			Recommendation

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	Act would seem to be required. If the planning authority wishes to advance then the NRA are willing to consider it in the context of the overall transport proposals for the area.			No change to Variation No.2: SUFP.
(xiii)	The Bracken Road Extension (No.3) proposes a new junction on the Drummartin Link Road approximately 120 meters north of the Sandyford roundabout part of the M50 junction 14, which is very close to what is a busy junction. In addition the proposed junction would severely constrain the alignment of the connection of the Dublin Eastern Bypass into M50 junction 14 and therefore it is in conflict with objective TAM 20. The NRA is therefore opposed to this proposal and requests that it is omitted.	V2043		The traffic study has indicated no ill effect on the Sandyford interchange. On the contrary this left in/left out only scheme has been included as a six-year objective in the plan due to the benefits predicted without negative impact on the nearby interchange. The possible impact on the proposed route of the Dublin Eastern Bypass are addressed as follows: - The preliminary design submitted has confirmed that the proposed Bracken Road Extension is entirely compatible with the horizontal alignment of the Dublin Eastern Bypass Motorway and does not give rise to any additional constraints. The vertical alignment design of the Bracken Road Extension has taken due cognisance of the Eastern Bypass Motorway. The preliminary design submitted has demonstrated the compatibility of both schemes with some minor adjustment to vertical alignment to the southbound feeder lane of the Dublin Eastern Bypass Motorway. The Bracken Road Extension could significantly facilitate the traffic management and sequencing of the works during the construction of the Dublin Eastern Bypass by virtue of the fact that it provides for increased permeability to and from the Sandyford Business District. Recommendation No change to Variation No.2: SUFP.
(xiv)	The NRA advises that they have no great difficulties to a similar proposal to the ESB Link Road (No.6) proposed as a bus link only. However,	V2043		The traffic study has indicated no ill effect on the M50 junction 14. On the contrary this scheme has been included as a six-year objective in the plan due to the benefits predicted without negative impact on the M50 junction 14. Recommendation No change to Variation No.2: SUFP.

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	the proposed link providing for general traffic could potentially increase unacceptable traffic loading onto the M50 junction 14 beyond the point that can be efficiently supported. The NRA recommends that further detailed analysis needs to be done on this proposal and should be omitted.			
Long-t	term Roads Objectives			
(i)	The proposed Link Road (No. 2b and 10) would not only be detrimental to the development of Central Park but is also not feasible due to a number of technical reasons.	V2052		It is recognised in the Transportation Background Paper that the links No.2b and 10 are more problematic to deliver in terms of land costs, construction costs and planning constraints. It was subsequently determined that these schemes could be eliminated from the short-term 6-year objectives without unduly effecting the road network performance. However, they are retained as long-term objectives in the plan, due to their strategic benefits, so that their implementation may be included for consideration at some point in the future. Recommendation No change to Variation No.2: SUFP.
(ii)	The NRA does not support the slip from the Leopardstown Road (N31) to the M50 southbound (No.4), as it would create a new access to the M50, which is contrary to national policy relating to national roads. There are already a multiplicity of access points to the M50, which facilitates the use of the M50 as a distribution road to the detriment of	V2043		The N31 by virtue of its designation as a national primary road has a strategic function. Therefore this road linking national road to motorway would facilitate the strategic function of the N31. Furthermore, traffic on the N31 currently wishing to access the M50 has to do so via local and regional roads and the Sandyford rotary. The provision of this link in addition to facilitating the strategic function of the N31 would provide congestion relief at the Sandyford rotary and would be of particular benefit in the context of the connection of the Dublin Eastern Bypass to the M50. Notwithstanding the above, the Council has respected the current view of the NRA on this scheme and consequently it has not been proposed during the life of the plan but has been retained for possible consideration in the future by including as a long-term roads objective. Recommendation No change to Variation No.2: SUFP.

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	its strategic bypass function.			
(iii)	Subject to confirmation that the Grade Separation at Drummartin Link Road and Blackthorn Drive (No.8) is compatible with the possible future implementation of the Dublin Eastern Bypass, the NRA would have no issues with this proposal.	V2043		The preliminary design prepared and presented to the NRA is intended to be entirely compatible with the alignment currently available for the Dublin Eastern Bypass. Recommendation No change to Variation No.2: SUFP.
(iv)	With regards to the proposed Leopardstown Road to Murphystown Link Road (No.10) the NRA acknowledges the benefits arising from enhancing the local road network that should allow for reduced reliance on the M50 for local traffic accessing the SBD. Accordingly the NRA supports the principle of this proposal.	V2043		NRA support noted. Recommendation No change to Variation No.2: SUFP.
4.3 Co	mmunity Infrastructure			
	Open Space			
(i)	No mention of Children's Playgrounds	V2002	M1 D10	Play ground/play opportunities will be designed into class 1 open spaces and some forms of active recreation will be provided for within some of the pocket parks.
				Recommendation Change Objective F1 to read as follows; "It is an objective of the Council to expand on the existing public open space provision by the inclusion of St Benildus sports facilities on the southern side of St. Benildus Avenue to provide Class 1 Public Open Space use. This

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			will include play opportunities, playing pitches, a dogs off leash area, a network of paths, park style boundary treatment and soft and hard landscape elements".
			Change to objective F3 to read as follows; "It is an objective to the Council to develop a Sandyford Business District Civic Park (circa .08ha of Class 1 Open Space). A balance will be struck in the design and layout of this park between the smart, civic quality of an urban square, and the casual, spontaneous nature of a residential area. This will include significant water features, a high degree of sculptural influence, play opportunities, hard & soft landscape features and extensive tree planting.(SLO 119)"
(ii)	Lack of amenity open	V2016 V2017	Within a 1.5km radius of the plan area there is currently 36.29 ha of public open.
(iii)	space provision in the SUFP. Insufficient provision of open space and European Best Standard	V2019 V2022 V2023 V2024 V2036	Best practice guidance for open space provision suggests that standards should be set locally and that is what the Framework Plan has set out to achieve. The Framework Plan has taken into account the fact that there are 7.4 ha of woodland at South County Business Park which are accessible to the public and that in such an urban context due regard must be given to the value of public realm and private open space such as courtyards and roof gardens for recreation and relaxation.
(iv)	Expand the amount of green/open space provision.	V2038 V2039 V2040 V2041	11.45 ha of open space (excluding the Reservoir lands) is provided for within the Sandyford Urban Framework Plan area in the form of Class 1 Open Spaces and pocket parks.
(v) (vi)	Location of civic park Rationale of combining St	V2048 V2070 V2076	Open space requirements have been devised to meet the needs of both the proposed employment and residential communities. This plan and the open space provided addresses the increase in residential and employment population as a result of future growth in office based floor space of 350,000msq and the provision of an additional 1000 residential units.
	Benildus and Council owned lands to provide a Class 1 open space given that they are already open space.		The rationale for the location of the Civic park at the corner of Corrig Road and Carmanhall Road is to create a Park and event space at the heart of the existing and proposed residential and commercial/office based communities. A town park within easy access of homes and work places (and away from busy roads). The existing mature trees, which will form part of the park, enhance this location and the proposed shared surface, which will extend the public realm element of the site. The proposal to locate this park to the corner of Corrig Road and Blackthorn Road is not advisable as it would position the open space to the periphery of the existing and proposed residential communities and would front onto a busy road.
			At present the lands at St Benildus and the adjoining Council lands are used for sports. The rationale of combining these lands is to create a park, which will include a wider range of activities for the new communities. This park will not only include playing pitches but also play opportunities for children, a dogs off leash area, path networks, improved boundary treatments and both soft and hard landscaped elements. This park will also provide for both the passive and active recreational needs of the wider community.

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				Recommendation: No change to variation No.2: SUFP
(vii)	Concerns in relation to the development of an open space/park on the reservoir lands and the amenity and privacy of adjoining residential properties.	V2010		For clarity purposes drawing no. 10 referred to in section 4.3.1 and objective OS5 outlines the Councils objective in relation to developing part of the reservoir as active open space (class 1). Due regard will be given in the design of the open space to insure there will be no over looking of houses. The future covering over of part of the reservoir is required to meet drinking water standards. Recommendation: Recommend change of OS5 to include the above statement. It is an objective of the Council to actively pursue the use of the existing reservoir site as active open space (Class 1) when the use of part of this area as a reservoir is abandoned and the remaining part is covered over. Due regard will be given in the design of the open space to insure there will be no over looking of houses. This space will compensate for any future loss of the parklands at St. Benildus associated with the construction of the Eastern Bypass. (Drawing 10, A2)
(viii)	Objective OS3 to open the Maretimo Stream Culvert where feasible. How will this affect development standards?	V2069	D10, M2	The Maretimo Stream is currently in culvert. Development cannot occur over this. The objective to open up the culvert where possible, and create a green route alongside, is provided to encourage the provision of high quality public realm and walking environment as part of any future development. The provision of this will have no subsequent impact on the plot ratios identified in Map 2. Recommendation: No change to variation No.2: SUFP
(ix)	Objective OS1 and SLO 121 – pocket park at Leopardstown Retail Park lies on boundary of 2 landowners – provision of this park dependent on both sites being developed. This Park may therefore not be provided in short to medium term.	V2070	M1, D10	Pocket Parks which straddle two or more landowners should not preclude the phased development of part of the parks which should be made available for use by the local communities. The further development of the pocket park would follow on in phases pending future development of adjoining sites. Recommendation: No change to variation No.2:SUFP
(x)	OS4 to be amended to include "The scale of <i>new office</i> development,	V2042		It is not considered necessary to change the wording as suggested. OS4 is suitably worded, together with SLO 115 to retain the sylvan setting of the Business Park.

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	positioning, landscape and architectural treatment within this area will be required to demonstrate that it maintains this sylvan setting".			Recommendation: No change to variation No.2:SUFP
	Community Facilities	V2016		CLO 112 facilitates the apprinting of a community facility at the course of Community Dood/Disaltheur Dood
(i)	Proposed community facilities are sorely lacking with only 1 facility proposed as an objective for Carmanhall Road - which means social infrastructure is largely ignored.	V2017 V2022		SLO 113 facilitates the provision of a community facility at the corner of Carmanhall Road/Blackthorn Road. However, community facilities/cultural uses/leisure facilities are either permitted in principle or open for consideration under the Land Use Zoning Objectives (Appendix 1) Zone 1 'MIC', Zone 2'MOC', Zone 3 'OE', Zone 4'LIW', Zone 5 'A2', Zone 6 'MH' and Zone 'F'. Recommendation No change to Variation NO.2: SUFP
4.3.3 E	ducation			
(i) (ii)	Concerns regarding the quantum of education facilities earmarked for the SBD and the designation of lands under SLO112, given the quantum of 1-2 bed apartments, which will not result in a high child population in the area. Noted that the Dept. of Education has not identified D18 or Sandyford as a location for new schools in the short-medium term.	V2029		Existing/permitted residential units in SBD are generally 1 or 2 bedroom apartment type units therefore in the interest of providing a varied mix of housing types, it is proposed that residential development at Carmanhall Road will consist of predominately own door access, family type units with taller buildings to the outer edge of the neighbourhood only to provide enclosure to the centre. The provision of school sites accords with the requirement of the Department of Education. It is necessary to identify sites so that they will be available at appropriate locations when required. The Department have agreed with the sites identified in the Plan and consider them to be appropriate in a developed area/area in transition, considering there are no greenfiled sites within Sandyford Business District (see submission from Department of Education no. V2005). Recommendation No change to Variation NO.2:SUFP

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(iii)	Dept. Education notes the zoning for primary and post-primary provision in zoning maps as per discussion between DLRCC and DES Forward Planning Staff re: provision of educational facilities in the SUFP area given the residential zoning outlined. No further comment at this time re this variation.	V2005		Noted. Recommendation No change to Variation NO.2:SUFP
(iv)	Deficiencies in the rationale for school provision, particularly post primary at Holly Avenue due to: nature of existing industrial development; the site being isolated from residential; lack of genuine need for this level of school provision and likelihood that residential units will not be built out given the economic climate and phasing (education population and resident population assumptions in Background paper are contradictory); predominance of 1-2 bed units and household size, 1.87 - 2pph more appropriate.	V2037 V2053 V2050	1	Education statistics are based on the Department of Education criteria for number of persons per household 2.77pph. DLRCC population projections are based on 2.5pph which allows therefore for a further 1,000 units. LUTS traffic model was based on 729 units. An allowance has been made for 1,000 additional units within Sandyford Business District, allowing for residential permissions that have expired. Regional Planning Guidelines identifies occupancy rates 2.58pph in the GDA by 2022 and in DLR 2.42pph by 2016. Proposed future housing will provide a mix of housing types, in particular family type accommodation, such as own door residential units, which will have a higher occupancy rate of the permitted and existing apartments. Phasing of residential units is based on the provision of open space – P1 and not constrained by other large scale infrastructure projects. The provision of school sites accords with the requirement of the Department of Education. It is necessary to identify sites so that they will be available at appropriate locations when required. The Department have agreed with the sites identified in the Plan and consider them to be appropriate in a developed area/area in transition, considering there are no green field sites within Sandyford Business District (see submission from Department of Education no. V2005). Recommendation No change to Variation NO.2: SUFP

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(v)	Background paper recognises the Benildus school site for post primary, yet the SLO 112 does not specify.	V2053	1	The provision of school sites accords with the requirement of the Department of Education. It is necessary to identify sites so that they will be available at appropriate locations when required. The Department have agreed with the sites identified in the Plan and consider them to be appropriate in a developed area/area in transition, considering there are no green field sites within Sandyford Business District (see submission from Department of Education no. V2005). However, given that further assessment will be required by the Department of Education of the sites and their possible acquisition, it was deemed appropriate not to designate the sites to either primary or post primary at this stage. Recommendation No change to Variation NO.2: SUFP
(vi)	Department of Education carried out a study on education needs – D18 nor Sandyford was identified.	V2037		The provision of school sites accords with the requirement of the Department of Education. It is necessary to identify sites so that they will be available at appropriate locations when required. The Department have agreed with the sites identified in the Plan and consider them to be appropriate in a developed area/area in transition, considering there are no green field sites within Sandyford Business District (see submission from Department of Education no. V2005). Recommendation No change to Variation NO.2: SUFP

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SECTION 4. INFRASTRUCTURE			
(i) Dept. Communications, Energy & Natural Resources has no comment at this time but without prejudice to this the comments of the Inland Fisheries Ireland are that: - the IFI has no observations to make on the variation.			Noted Recommendation No change to Variation No.2: SUFP
(ii) Concerns regarding the shortage of basic infrastructural systems such as water, sewage etc, but still allowing 250,000sq.m of development. Ensure adequate capacity issue regarding infrastructure is addressed before any further large-scale development is allowed.	V2036 V2076 V2039 V2040 V2041 V2008		The SUFP is based on ensuring adequate capacity of infrastructure including water and drainage infrastructure as outlined in Section 1.6.1 "Rationale underpinning the SUFP" and in Section 4: Infrastructure which includes a number of objectives to provide for and/or facilitate the provision of Environmental Infrastructure (Water and Drainage), Multi Modal Transport Infrastructure (Public Transport/cycling and walking interventions, Smarter Travel Targets, Mobility Management Planning, Parking and Roads) and Community Infrastructure (Open space, Education and Community Facilities). The Plan also includes Policy SUFP12 "It is Council policy to ensure the orderly development of Sandyford Business District by the phasing of future development around the key delivery of infrastructure" Recommendation No change to Variation No.2: SUFP
(iii) The SUFP shall note that where the development of a landholding is not dependent on proposed infrastructure, permissions shall be considered.			Further development in Sandyford is reliant on the provision of the new infrastructure identified. The council requires some level of certainty regarding the deliverability of this infrastructure prior to additional development being permitted. Recommendation No change to Variation No.2: SUFP
4.1 Environmental Infrastructure			

Key Is	ssue	Sub. No.	Map No.	Manager's Response & Recommendation
AND FU	ON 5. PHASING UNDING			
	5.1 Phasing			
(i) The SUFP proposes an additional quantum of 250,000m2 of development with no plans showing how the necessary infrastructure (water, sewerage, transport, etc.) would be provided.		V2031		
ti ir fo	Requests inclusion a imeframe in the SUFP ncluding a programme or planning permissions, procurement of lands and commencement of works	V2028 V2029 V2045 V2050 V2052		Programme will be dictated by demand for and pace of development, however it is expected that the planning process for the schemes identified in P2 will commence soon after the adoption of the SUFP. Recommendation No change to Variation No.2: SUFP.
(iii) R d a s	Requests that a clearer definition of the allocation of the allocated agm. as per the proposed bhasing to be included in the plan.	V2028		The phased development quanta have not been allocated to particular plots of land as it would be impossible to predict the order in which land might be developed. The phasing outlined in the plan clearly shows what projects need to be progressed before a certain quantum of development is permitted. Recommendation No change to Variation No.2: SUFP.
ro tl a d d u	dify the mandatory anguage used with regard to Section 47 so hat the planning authority can exercise its discretion to secure the development of roads by using other powers such as CPO.	V2030		The language used in the draft SUFP does not preclude the use of Compulsory Purchase Orders. However, for the purpose of clarity it is recommended to amend the footnote 6. with respect to P9. Recommendation To amend footnote 6 "For the purpose of this Plan facilitated means: An applicant for planning permission in respect to their land holding will have entered a Section 47 Agreement under the Planning and Development Act 2000-2010, with the Planning Authority, that accommodates the realisation of the Road.
(v) I	mplementation of the	V2030		Further development in Sandyford is reliant on the provision of the new infrastructure identified. The Council

Key	Issue	Sub. No.	Map No.	Manager's Response & Recommendation
(vi)	SUFP constrained by phasing objectives P1-P9 - reliant on key infrastructure and few stakeholders and DLRCC. Introduce some flexibility in the phasing of development so that additional development cannot be frustrated by third parties.	V2031 V2037 V2050 V2069 V2070 V2072 V2073 V2074		requires some level of certainty regarding the deliverability of this infrastructure prior to additional development being permitted. Recommendation No change to Variation No.2: SUFP.
(vii)	The objectives of the SUFP state that planning permissions will not be granted until infrastructure has been delivered, thus it will not be possible to fund the schemes from levies (P1-P9).	V2045 V2050 V2075		Objectives P2, P3 and P4 require that the planning approval process shall be complete and planning approval granted prior to permission for development or development phase, not that the roads have to be delivered. Recommendation No change to Variation No.2: SUFP.
(viii)	The Plan should indicate which projects are to be provided by the Council and which should be the subject to further collections.	V2052		Policy SUFP13 Funding and Objective M1 advises that infrastructure and services that benefit the development of the area will be funded by way of a special levy scheme under Section 49 and/or an additional Section 48 Levy Scheme. Detailed analysis will be carried out as part of objective M1. Recommendation No change to Variation No.2: SUFP.
(ix)	The NTA welcomes the proposal for the preparation of an area wide Mobility Management Plan which can assist in achieving sustainable transport objectives. A provision to prepare this plan in	V2054		Issue noted. Recommendation To amend text for Objective TAM 9 to be amended as follows: - It is an objective of the Council to prepare an area wide Mobility Management Plan for Sandyford Business District in conjunction with stakeholders in the area and in consultation with the National Transport Authority.

Key	Issue	Sub. No.	Map No.	Manager's Response & Recommendation
	conjunction with the NTA is requested.			
(x)	Phasing objectives P2, P3, P4, P5, P6 preclude permission of additional development pending appropriate progress on delivery of road proposals. Suggests that objectives be altered to preclude construction of any permitted additional development.	V2058 V2059 V2060		The additional development should only be allowed to proceed in tandem with progress on the required road infrastructure. If commencement of construction of the additional development is precluded pending the commencement of construction of the road proposals then it considered that this would give rise to greater delay to additional development. Recommendation No change to Variation No.2: SUFP.
(xi)	Suggest that phasing objectives P2, P3, P4, P5, P6 be clarified that the "additional development" referred to is the 350,000sqm commercial space / 1000 apartment additional capacity over and above the quantum included in the "do nothing" scenario	V2060		The wording of the phasing is clear. P2 and P6 differ from P3, P4 and P5 in that P2 and P6 relate to all development not just office based employment. Recommendation No change to Variation No.2: SUFP.
(xii)	Concerns over delivery of green spaces before end of CDP in 2016	V2008 V2019 V2022 V2041		Contained within section 5.1.1 Phasing is objective P1 which states "It is an objective of the Council that no additional residential accommodation will be permitted until either the land at St. Benildus or the Civic Park has been procured or made available for public use. Provision of open space within commercial /office/retail areas is provided for within the plan area under each of the land use zone objectives MC5,MC7,OE1,LIW1,A23 and MH1. Recommendation: No change to variation No. 5
(xiii)	Implementation of the	V2070		Further development in Sandyford is reliant on the provision of the new infrastructure identified. The Council

Key	Issue	Sub. No.	Map No.	Manager's Response & Recommendation
	SUFP constrained by phasing objectives P1-P9 - reliant on key infrastructure and few stakeholders and DLRCC.	V2072 V2073 V2074 V2050 V2031		requires some level of certainty regarding the deliverability of this infrastructure prior to additional development being permitted. Recommendation No change to Variation No.2: SUFP.
(xiv)	Phasing to be reviewed, in particular for those areas that are not dependent on road upgrades.	V2050 V2028		All of the proposed future quantum 350,000sqm of office development, spread throughout the SUFP is dependent on roads infrastructure together with the Smarter Travel Objectives and public transport objectives/incentives. Other development, outside of the 350,000sqm office development is not subject to the phasing restrictions (except residential development in respect to P1). Recommendation No change to Variation NO.2: SUFP
(xv)	Phasing objectives conflict with Modal Split objectives – development dependent on roads infrastructure rather than improvement in public transport.	V2050		The Walking and Cycling Strategy, the Public Transport Strategy and Mobility Management Plan will be delivered before or in tandem with the Roads Strategy. DLR is also in discussion with the Quality Bus Network Office about the implementation of the Bus proposals as part of the Public Transport Strategy. The Manager recommends the inclusion of additional Phasing Objective P10 as set out below. Recommendation The following changes to Variation No.2: SUFP. Include "Phasing Objective P10" "It is an objective of the Council that satisfactory progress should be made with the implementation of the Public Transport, Walking & Cycling and Mobility Management Planning Objectives in tandem with phasing objectives P2, P3 and P4".
P1				
(i)	Phasing Objective P1 shall be omitted, it is considered to be onerous and will impact on requirement for school provision.	V2059 V2060 V2037 V2058	D10	Contained within section 5.1.1 Phasing is objective P1 which states "It is an objective of the Council that no additional residential accommodation will be permitted until either the land at St. Benildus or the Civic Park has been procured or made available for public use". It is imperative that the procurement and/or availability of public open space should be put in place prior to permitting new development in order to insure that these facilities are available in the short term. Recommendation No change to Variation No.2: SUFP

Key	Issue	Sub. No.	Map No.	Manager's Response & Recommendation
(ii)	Add to P1 "that no residential or <i>commercial</i> development"	V2048		The Plan requires all commercial development to provide open space as part of their proposals. It is considered that to delay commercial development until Class 1 open space has been procured and made available is not a necessary restraint. Recommendation
				No change to Variation No.2: SUFP
P2				
(i)	Objective P2 will impose an absolute prohibition on any form of additional development being permitted within the South County Business Park pending the infrastructural improvements.	V2075		Further development in Sandyford is reliant on the provision of the new infrastructure identified. The Council requires some level of certainty regarding the deliverability of this infrastructure prior to additional development being permitted. Objective P2 requires that the planning approval process shall be complete and planning approval granted prior to permission for development or development phase, not that the roads have to be delivered. Recommendation No change to Variation No.2: SUFP
P3 and	I P4			
(i)	Phasing objective P3 appears to conflict with one of the main stated objectives of the SUFP which is achieving a further quantum of office development of 250,000sqm which would bring the total office development to 350,000sqm (250k plus 100k already permitted)	V2048 V2069 V2070 V2071 V2072		The further 350,000sqm of development is composed of 250,000sqm over and above that already permitted to date plus 100,000sqm arising from redevelopment of existing sites, i.e. existing development that will be removed and replaced. In the traffic modelling study any development that had already been permitted but not yet constructed or occupied was included along with existing development, and considered in effect to be the same as existing development. Recommendation No change to Variation No.2: SUFP.
(ii)	The NTA recommends that an additional qualifier should be included in the text of objectives P3 and P4 to ensure that these road proposals will be	V2054		Issue noted and considered. Recommendation The following changes to Variation No.2: SUFP. Additional text to Objective P3 Prior to implementation of these road schemes, that consultation and review will be carried out with the National

Key	Issue	Sub. No.	Map No.	Manager's Response & Recommendation
	consistent with the Draft Transport Strategy for the Greater Dublin Area			Transport Authority based on their adopted Transport Strategy for the Greater Dublin Area. Additional text to Objective P4 Prior to implementation of these road schemes, that consultation and review will be carried out with the National Transport Authority based on their adopted Transport Strategy for the Greater Dublin Area.
P6				
(i)	Phasing is dependent on Mobility Study – Council needs to complete this work.	V2071		The Area Wide Mobility Management Plan is being prepared in tandem with the SUFP Recommendation No change to Variation No.2:SUFP
P8				
(i)	Amend P8 to remove reference to South County Business Park as it is considered that there are no foul sewer infrastructural capacity constraints in SCBP.	V2042		This is required to provide capacity to facilitate future development. Recommendation No change to Variation No2.:SUFP
P9				
(i)	P9 restricting development off Arena Road, is onerous – development of sites is dependent on ESB and Eircom sites to provide the link road. A short term solution should be considered.	V2070	D8	The language used in the draft SUFP does not preclude the use of Compulsory Purchase Orders. However, for the purpose of clarity it is recommended to amend the footnote 6. with respect to P9. Recommendation To amend footnote 6 "For the purpose of this Plan facilitated means: An applicant for planning permission in respect to their land holding will have entered a Section 47 Agreement under the Planning and Development Act 2000-2010, with the Planning Authority, that accommodates the realisation of the Road.
(ii)	Requests clarification on the position regarding the section 47 agreement.	V2029 V2045 V2065		The language used in the draft SUFP does not preclude the use of Compulsory Purchase Orders. However, for the purpose of clarity it is recommended to amend the footnote 6. with respect to P9. Recommendation To amend footnote 6 "For the purpose of this Plan facilitated means: An applicant for planning permission in respect to their land holding will have entered a Section 47 Agreement under the Planning and Development Act 2000-2010, with the Planning Authority, that accommodates the realisation of the Road.

Key	Issue	Sub. No.	Map No.	Manager's Response & Recommendation
Sectio (i)	Requests clarification and analysis of funding mechanisms and questions the sustainability of funding for infrastructure from Section 48 or 49 Levy schemes and recognition of previously paid S48 contributions and consideration of landowners input.	V2028 V2029 V2031 V2052 V2065 V2069 V2070 V2071 V2072 V2073 V2075		There are two funding options under the Planning and Development Act 2000-2010, Section 48 Levy scheme and Section 49 Levy Scheme. Policy SUFP13 Funding and Objective M1 advises that infrastructure and services that benefit the development of the area will be funded by way of a special levy scheme under Section 49 and/or an additional Section 48 Levy Scheme. Detailed analysis will be carried out as part of objective M1. Recommendation No change to Variation No.2: SUFP.
(ii)	The plan should indicate which projects are to be provided by the Council and which should be subject to further contribution collections. The Luas levy needs to be amended to be proportionate to the values and use of sites, not to the site area. Also, small changes of use, and small external changes for cladding, windows, and small office increases need to be exempted.	V2052		Policy SUFP13 Funding and Objective M1 advises that infrastructure and services that benefit the development of the area will be funded by way of a special levy scheme under Section 49 and/or an additional Section 48 Levy Scheme. Detailed analysis will be carried out as part of objective M1. The Luas Levy is not a Plan issue. Recommendation No change to Variation No.2: SUFP.
(iii)	Seek to encourage public investment in key infrastructure and open space given Sandyford's importance at regional level.	V2031 V2069 V2070 V2071 V2072 V2073		There are two funding options under the Planning and Development Act 2000-2010, Section 48 Levy scheme and Section 49 Levy Scheme. Detailed analysis will be carried out as part of objective M1. Recommendation No change to Variation No.2: SUFP.

Key Issue	Sub. No.	Map No.	Manager's Response & Recommendation
(iv) No details of what projects might be included in new Levy scheme and what funding is already generated by existing Section 48 scheme – this should be detailed. How can funding be made available if permissions cannot be granted prior to delivery of infrastructure?	V2074 V2031 V2070 V2071 V2072 V2045 V2052		Policy SUFP13 Funding and Objective M1 advises that infrastructure and services that benefit the development of the area will be funded by way of a special levy scheme under Section 49 and/or an additional Section 48 Levy Scheme. Detailed analysis will be carried out as part of objective M1. To clarify that Objectives P2, P3 P4 and P5 require that the planning approval process shall be complete and planning approval granted prior to permission for development or development phase, not that the roads have to be delivered. Recommendation No change to Variation No.2: SUFP.

Key Issue	Sub. No.	Map No.	Manager's Response & Recommendation
APPENDIX 2. SPECIFIC			
LOCAL OBJECTIVES			
SLO109 Uses to animate			
street corners at north west end of Ballymoss Road			
(i) Concerns regarding the allowance for an aparthotel on the Siemens site due to its potential height and scale in direct view from Stillorgan Heath housing estate so having visual amenity impact.	V2010		It is clearly stated in the text that Hotel/Apart Hotel is an example of use only. It is a suggested use that creates activity throughout the day and night. The design and use of such a building will be fully considered at the planning application stage. Recommendation No change to Variation No.2: SUFP
(ii) Welcome SLO109, but considers that the policy may restrict the use to Hotel/Apart Hotel only. Remove SLO109 to ensure a viable use can be provided.	V2073	1	It is clearly stated in the text that Hotel/Apart Hotel is an example of use only. It is a suggested use that creates activity throughout the day and night. The design and use of such a building will be fully considered at the planning application stage. Recommendation No change to Variation No.2: SUFP
SLO112 Education			
(i) Seek removal of SLO112 from Map1 re: Legionaries of Christ site. Submitted that the site does not conform to the Dept. of Education's requirements for the delivery of State Schools as it does not provide an appropriate education environment e.g proximity to existing and planned residential development and existing and planned community facilities.	V2029		The provision of school sites accords with the requirements of the Department of Education. It is necessary to identify sites so that they will be available at appropriate locations when required. The Department have agreed with the sites identified in the Plan and consider them to be appropriate in a developed area/area in transition, considering there are no green field sites within Sandyford Business District. Recommendation No change to Variation No.2: SUFP

Key Issue	Sub. No.	Map No.	Manager's Response & Recommendation
(ii) Remove 'Objective E2' (iii) Concerns regarding the quantum of education facilities earmarked for the SBD and the designation of lands under SLO112, given the quantum of 1-2 bed apartments, which will not result in a high child population in the area. Noted that the Dept. of Education has not identified D18 or Sandyford as a location for new schools in the short-medium term.	V2029		Existing/permitted residential units in SBD are generally 1 or 2 bedroom apartment type units therefore in the interest of providing a varied mix of housing types, it is proposed that residential development at Carmenhall Road will consist of predominately own door access, family type units with taller buildings to the outer edge of the neighbourhood only to provide enclosure to the centre. The provision of school sites accords with the requirements of the Department of Education. It is necessary to identify sites so that they will be available at appropriate locations when required. The Department have agreed with the sites identified in the Plan and consider them to be appropriate in a developed area/area in transition, considering there are no greenfield sites within Sandyford Business District (see submission from Department of Education no. V2005). Recommendation No change to Variation NO.2:SUFP
(iv) The term 'Sports Ground' appears on the Legionaries of Christ lands on Map 1-3 and Drawing No.s 2,3 & 12. This suggests that these sports fields are available for public use when they are for private use only. It is requested that Maps 1-3 and Drawing No.s 2, 3 and 12 be amended to remove the term 'Sports Ground'.	V2029		The text "sports Grounds" is the standard annotation on the Ordnance Survey Mapping. Recommendation No change to Variation No.2: SUFP
(v) Due to the moratorium, the status of the Legionaries of Christ lands in SUFP appears to have been influenced by its historic use rather than its landmark status as one of the primary entrances to Sandyford Business District and its proximity to high	V2029		The Legionaries of Christ Lands were considered appropriate for the "INST" objective during the preparation of the County Development Plan 2010-2016 given the site's existing open character and the existing use as a residential institution and as such it is proposed to retain this objective in the County Development Plan. The "INST" objective does not prohibit or constrain development but simply ensures that any future development on the site maintains an open character. The site is considered in principle to be a suitable site for educational uses by the Department of Education. Recommendation No change to Variation No.2: SUFP

Key Issue	Sub. No.	Map No.	Manager's Response & Recommendation		
density development and the Central Park Luas stop.					
(vi) Welcome additional education facilities, but object to any pitches that did not welcome adult Gaelic games as primary use – would thus necessitate east-west alignment of pitches.	V2068	1	Issue noted. To note that Drawing 11 is illustrative only. Adult Gaelic pitches will be facilitated where possible and appropriate. Recommendation No change to Variation No.2: SUFP		
(vii) Seek the omission of SLO112, specifically at Holly Avenue due to its location at the heart of a commercially active area. Related environmental and traffic impacts (eg: traffic hazard from HGV movements, conflicts between business and school drop off traffic) do not accord with proper planning and sustainable development of the area. SLO112 does not accord with Land Use Zoning Objective and will constrain redevelopment proposals in line with objective 'LIW' in the interim. How would this objective be realized, i.e., CPO or demolition of new development?	V2033 V2037 V2053	1	The provision of school sites accords with the requirements of the Department of Education. It is necessary to identify sites so that they will be available at appropriate locations when required. The Department have agreed with the sites identified in the Plan and consider them to be appropriate in a developed area/area in transition, considering there are no greenfiled sites within Sandyford Business District. The quantum of office development available in the future, based on the traffic this type of high intensity employment generates, is limited (350.000sqm). To provide for office based employment outside of those areas zoned 3 would allow for additional office based employment over and above the 350,000sqm. Noted that uses permitted in principle/open for consideration do not allow for those promoted under SLO's in certain circumstances. Recommendation Amend text SUFP 1 (Section 2.3.1) as follows after "The different land uses are set out below. The land use zoning objectives, that is; the uses permitted in principle and open for consideration are set out in Appendix 1. In addition specific Local Objectives are identified at site specific locations (Appendix 2 and Map 1 SUFP and Map 6 CDP). Within Sandyford Business District, in cases where the Land Use Zoning Objectives appear to conflict with the requirements of a Specific Local Objective, the uses promoted under the Specific Local Objective will be allowed for in addition to the uses permitted in principle and open for consideration".		
(vii)iSLO112 does not specify which site is designated for primary and which is	V2053	1	The size and number of the proposed sites for educational use were identified through consultation with the Department of Education. The Department of Education was also consulted on the proposed location once identified. At this stage the Department of Education agreed in principle with the 2 locations, however, given that		

Key Issue	Sub. No.	Map No.	Manager's Response & Recommendation
designated for post primary, despite indications made in the Background Papers.			further assessment will be required by the Department of Education of the sites and their possible acquisition, it was deemed appropriate not to designate the sites to either primary or post primary at this stage. Recommendation No change to Variation No2: SUFP
SLO113 Social and community infrastructure			
(i) It is not considered appropriate that this site should provide community facilities to provide for the resident and worker population of the estate.	V2060	1	Community infrastructure is "permitted in principle" or "open for consideration" within each Land Use Zoning Objective and therefore, it is expected that a variety of community facilities will be provided throughout the Plan area in this regard. SLO113 simply identifies a suitable and appropriate ground floor use along Blackthorn Road to ensure that the street is animated at this location. Recommendation No Change to Variation No.2:SUFP
SLO115 Sylvan Setting South County Business Park			
(i) Amend SLO115 to include "New development within South County Business Park shall comprise buildings of high quality architecture in order to retain and enhance the sylvan character at South County Business Park".	V2042	1	The Manager does not agree with this. It is considered that SLO115 is suitably worded to protect the Sylvan setting of the Business Park. Recommendation No change to Variation No.2: SUFP.
SLO116 Uses to create active street frontage			
(i) This SLO is located within Land Use Zoning Objective 'A2' where such uses are neither permitted in principle nor open for consideration.	V2023 V2060	1	Noted that uses permitted in principle/open for consideration do not allow for those promoted under SLO116. Objective to be included to allow for uses promoted under SLO116. Recommendation Amend text SUFP 1 (Section 2.3.1) as follows after "The different land uses are set out below. The land use zoning objectives, that is; the uses permitted in principle and open for consideration are set out in Appendix 1. In addition specific Local Objectives are identified at site specific locations (Appendix 2 and Map 1 SUFP and Map 6 CDP). Within Sandyford Business District, in cases where the Land Use Zoning Objectives appear to conflict with the requirements of a Specific Local Objective, the uses promoted under the Specific Local Objective will be allowed for in addition to

Key Issue	Sub. No.	Map No.	Manager's Response & Recommendation			
			the uses permitted in principle and open for consideration".			
Applicatin of SLO 116 to the site at the corner of Carmenhall Road and Blackthorn Road.	V2060		SLO 116 does not relate to this site. SLO 116 is located on the map so as to identify its geographical location. It is considered that the wording for SLO 116 was interpreted differently to what was intended and what is displayed by the map.			
			The Manager recommends the following clarification be included in the wording of SLO 116			
			Recommendation Amend text of SLO 116 to read: "To facilitate the provision of uses that will create an active street frontage and			
			provide a transition between the residential neighbourhood and the opposing employment based areas along Blackthorn Road (where Blackthorn Road runs parallel with Carmanhall Road only). It is anticipated that these will be provided as own door units for small business."			
SLO118 Former Harcourt Street Railway Line Path						
(i) Residents of Leopardstown Lawn object to the provision of a pedestrian and cycle link along the Old Harcourt Street Railway Line for the reasons including: - privacy, security, construction and structural impacts, increased traffic and demand for on-street parking (due to proximity to Luas), light pollution, wildlife, noise and anti- social behaviour - unfair	V2001 V2002 V2003 V2011 V2014 V2015 V2021 V2026 V2067		The Manager appreciates the concerns of the residents. This new green route represents a significant enhancement in both pedestrian and cycling infrastructure for the area and will resolve the existing severance issues experienced by non-motorised users wishing to access the Sandyford area and the Luas. Proposed scheme will undergo separate planning approval process (possibly under Part 8) at which time any specific issues relating to the design of the scheme can be appropriately considered. It is the intention of the Council to plant native trees along this route, to enhance the wildlife corridor and all that mature trees will be retained. Recommendation No change to Variation No.2: SUFP.			
proposal.	1/2002		The Old Harranet Charles Daily and the relation field and in the control of the Council			
(ii) Will the land be subject to CPO?	V2002		The Old Harcourt Street Railway Line and the playing field are in the control of the Council. Recommendation No change to Variation No.2: SUFP.			
(iii) Link not warranted, as there is no recognisable	V2003 V2011		This new green route represents a significant enhancement in both pedestrian and cycling infrastructure for the area and will resolve the existing severance issues experienced by non-motorised users wishing to access the Sandyford			

Key Issue	Sub. No.	Map No.	Manager's Response & Recommendation
footfall. Large housing estates in Leopardstown using new LUAS stations.	V2067 V2014		area and the Luas. Recommendation No change to Variation No.2: SUFP.
(iv) Objection to Harcourt Street route as residents not consulted about the planned path at any stage.	V2014 V2026 V2015		The Manager appreciates the concerns of the residents. Proposed scheme will undergo separate planning approval process (possibly under Part 8) at which time any specific issues relating to the design of the scheme can be appropriately considered. Recommendation No change to Variation No.2: SUFP.
(v) Submitted that there is a swing gateway hidden by overgrowth at the Brewery Road exit to the line, that had the steps to/ from it demolished a long time ago. This indicates that there was a 'Right of Way' to the old railway station forgotten or abandoned. This 'Right of Way' could easily be restored at minimal cost, with a Zebra Crossing on Brewery Road to be included in plan.	V2007		The information is noted and will be examined as part of the design of the scheme. Recommendation No change to Variation No.2: SUFP.
(vi) SUFP should address the existing laneway issue for access from Brewery Road to the Luas, which was once straight, providing visibility but a bend was introduced so that it is now unsafe as it is a hiding spot.	V2026		Alignment of this existing route is constrained on one side by the LUAS depot and by the Dublin City Council reservoir on the other side. More access by pedestrians and cyclists can result in increased passive surveillance and thus improved personal safety. Recommendation No change to Variation No.2: SUFP.

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(i) Delete SLO 119	ete SLO 119 V2038 1 The CDP serve as that SLC Buisness The civic location neighbor trees, will public research.		the CDP 2010-1016 has a specific objective SLO100 "to provide a civic square in Sandyford Business Estate to be the case of the whole county". The proposed civic park at Corrig Road is now what is proposed to meet that SLO. SLO100 is proposed to be deleted from the CDP and to be replaced with SLO119 "to develop a Sandyford uisness District Park at the corner of Corrig Road and Carmanhall Road". The civic park is located at the pivotal Junction to Corrig Road and Carmanhall Road. It is considered that this recation provides a sheltered, centralised high amenity open space between the core areas and the residential eighbourhood. An amenity space which would benefit both local residents and workers alike. The existing mature rees, which will form part of the park, enhance this location and the proposed shared surface, which will extend the ublic realm element of the site **Ecommendation** To change to Variation No.2: SUFP.			
SLO121 Pocket Parks and						
(i) Request DLRCC to confirm: that the pocket parks/urban plazas are to be provided within lands already controlled by DLRCC or whether it is expected that lands will be offered up; will they be taken in charge; are these lands to be CPO'd pro rata to the cost; that the plot ratio standard will be calculated on the existing plot size and not a reduced plot size (net of any plaza).	V2073	1	Pocket parks and urban plazas will be provided by the landowner/developer as part of the proposed development scheme in accordance with the 10-15% open space requirement identified in Section 2.3 Land Use Policies and Objectives. These lands may be taken in charge by the County Council. To clarify, the plot ratio is calculated on the total site area. It is considered that Section 2.5.1 should be amended to clarify this point. Recommendation Density of development across the Plan areas calculated as follows: The ratio gross external floor area to plot size (plot size includes open space provision but excluding road schemes identified as Roads Objectives TAM 18, TAM 19, TAM 20) – plot ratio			
(ii) Strongly object to SLO121 on site (Reservoir House) on Ballymoss Road/Blackthorn Ave – will render the development of this site unviable.	V2050	1 D10 D11	Pocket parks and urban plazas will be provided by the landowner/developer as part of the proposed development scheme in accordance with the 10-15% open space requirement identified in Section 2.3 Land Use Policies and Objectives. It should be noted that all commercial development, with some exceptions within Zone 4, are required to provide 10-15% of the site area for Class 2 Open Space. In areas where SLO121 is identified, this 10-15% shall be provided by way of a pocket park or urban plaza. The calculations for plot ratio include the total site area (including Class 2 open space). The provision of Class 2			

Key Issue	Sub. No.	Map No.	Manager's Response & Recommendation			
			open space, does not therefore result in a loss of development potential.			
			It is considered that Section 2.5.1 should be amended to clarify this point.			
			Recommendation Density of development across the Plan areas calculated as follows: The ratio gross external floor area to plot size (plot size includes open space provision but excluding road schemes identified as Roads Objectives TAM 18, TAM 19, TAM 20) – plot ratio			

PART 4 SUBMISSIONS MADE IN RELATION TO THE ENVIRONMENTAL REPORT

Submissions that raised issues in relation to the Environmental Report accompanying the Proposed Variation No.2 to the Dún Laoghaire Rathdown County Development Plan 2010-2016 have been addressed in a document prepared by CAAS Ltd. on behalf of Dún Laoghaire Rathdown County Council. This document is called Addendum I.

The Manager has agreed to the responses, and recommends the changes identified in the report prepared by CAAS. Any recommended changes to the proposed Variation No. 2 Environmental Report have been highlighted in red text, as with all previous sections of the Manager's Report.

Addendum I

TO THE

SEA ENVIRONMENTAL REPORT & APPROPRIATE ASSESSMENT

OF THE

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

RESPONSE TO RELEVANT SUBMISSIONS & UPDATES ARISING

for: Dún Laoghaire-Rathdown County Council

County Hall Marine Road

Dún Laoghaire



by: CAAS Ltd.

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MARCH 2011

Addendum I to the SEA Environmental Report & AA for Proposed Variation No. 2 to the Dún Laoghaire-Rathdown CDP 2010-2016

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1 Introduction

This document responds to relevant submissions which were made during the period of public display of Proposed Variation No. 2 to the Dún Laoghaire-Rathdown CDP 2010-2016 and accompanying Environmental Report (ER) on the Strategic Environmental Assessment (SEA) process and Draft Appropriate Assessment (AA) Screening Report. This Addendum provides responses to relevant submissions or parts of relevant submissions which relate to the ER and AA.

It is noted that consequent changes are not made to the original ER or Draft AA at this stage; this Addendum forms part of the documentation of the ongoing SEA, AA and Variation-making processes. It supplements and should be read in conjunction with the original ER and Draft AA.

Any proposed modifications to the Draft Plan will be evaluated for their likely significant environmental consequences in advance of making the Variation.

If and when the Variation is made, the findings of this Addendum and any subsequent evaluation of proposed modifications will be used to update the ER and AA.

2 Responses to Submissions on the Environmental Report and Consequent Updates

Note that italicised text presents parts of the submissions that are relevant to the SEA ER and/or AA.

2.1 Submission No. V2048: Stillorgan District, Community and Residents Alliance

The relevant parts of the submission considered below occur in Appendix A of the Submission under the heading 'Strategic Environmental Assessment Environmental Report'.

2.1.1 Section 2 SEA Methodology

2.1.1.1 Point 1

The authors summarise their methods: 'in order to describe the baseline (the current state of the environment) at Sandyford, data was collated from currently available, relevant environmental sources'. There is no information at this point on how the authors handled situations where data were not available.

Response:

Information on difficulties encountered with regard to baseline information and how these difficulties were dealt with will be expanded upon within the report.

Updates to ER or AA Arising:

Insert a new subsection 2.9.2 entitled 'Baseline Data' as follows:

2.9.2 Baseline Data

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

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

There is currently no published local landscape mapping for the Variation lands however available information from the County Development Plan is utilised. This information shows that there are no landscape units, views or prospects which have a recognised county, national, European Union, international protection status within or adjacent to the area.

Noise mapping which was prepared by Dublin City Council, Fingal County Council, South Dublin County Council and Dún Laoghaire-Rathdown County Council in 2008 was included in the ER. However, a complete GIS dataset was not available at the time of writing the ER. Sections 7 and 8 of this report include an assessment of the likely significant environmental effects of the provisions of the Proposed Variation, including those on noise.

With regard to architectural heritage, there are no entries to the National Inventory of Archaeological Heritage (NIAH) as an NIAH survey has not been undertaken in the County; however, entries to the Record of Protected Structures included in the County Development Plan were considered by the SEA.

2.1.1.2 Point 2

The authors note that the SEA Directive requires that information be provided on 'any existing environmental problems which are relevant to the plan or programme'. The large scale developments which were permitted in recent years are relevant in this context and the inadequate environmental assessment prior to those developments. Specific concerns relate to the increased noise levels and air pollution associated with those developments.

Response:

Of environmental problems, the ER states:

'Annex I of Directive 2001/42/EC of the European Parliament and of the Council of Ministers, of 27 June 2001, on the assessment of the effects of certain plans and programmes on the environment (the Strategic Environmental Assessment Directive) requires that information is provided on 'any existing environmental problems which are relevant to the plan or programme', thus, helping to ensure that the proposed strategic action does not make existing environmental problems worse.

Environmental problems arise where there is a conflict between current environmental conditions and ideal targets. If environmental problems are identified at the outset they can help focus attention on important issues and geographical areas where environmental effects of the plan or programme may be likely.'

Environmental problems - including those which relate to development within and adjacent to the Variation lands - identified by the ER include:

- 'Changes in land cover indicated by the CORINE data (see Figure 3.6 for 2000-2006 changes and Figure 3.7 for 1990-2000 changes) indicate that semi natural areas within the Proposed Variation area have been replaced by uses which generally include impermeable surfaces. These changes are also likely to result in losses of biodiversity and flora and fauna.'
- 'WFD water status to the west of the Proposed Variation area is currently "poor".'
- 'The waste water treatment plant at Ringsend is operating currently operating at capacity
 and water quality in the Bay is of a relatively high standard, illustrated by the Blue Flag
 award held by Dollymount beach (2010).'
- 'Traffic hotspots within the Proposed Variation area are likely to have elevated levels of air pollution and noise due to traffic congestion.'
- 'Localised air pollution incidences with regard to PM10 and PM2.5 and noise pollution are both likely to occur when demolition/construction takes place - especially in relation to PM10 if suppression techniques are not introduced - and when traffic is queuing for long periods of time.'
- 'Ireland's current emissions are exceeding targets agreed in the peer review of Ireland's 2006 submission to the United Nations Framework Convention on Climate Change. It is unlikely that Ireland will meet these targets and it is likely therefore that financial penalties will be incurred. Transport related emissions continue to be the dominant growth sector.'

It is considered that the issues raised are covered in the ER.

Updates to ER or AA Arising:

None.

2.1.2 Section 3 Environmental Baseline of Sandyford

2.1.2.1 Biodiversity and Flora and Fauna

3.3.2 CORINE Land Cover Mapping

This mapping is carried out by the European Environment Agency in association with the European Space Agency. The land cover map for the year 2006 is shown in Figure 3.3. Differences in land cover between 2006 and 2000 and 1990 are described. It is noted that the land use maps are being updated. While 'the land cover shown on the maps is generally accurate', it is acknowledged that due to the methods 'there are likely to be a number of inaccuracies at the local level'.

3.3.5 Habitat Mapping Survey

The habitat mapping survey was reported by White Young Green to DLRCC in 2007.

3.3.7 Existing Biodiversity and Flora and Fauna Problems

This is based on the 2006 land cover map but makes general statements about the replacement of 'semi natural areas' with impermeable surfaces, and the resulting loss of biodiversity and flora and fauna.

Comment

It is unclear how an SEA can be done based on out of date information on land use. Given the extent of development in recent years, an up to date description of land cover should have been included. There are alternative sources of information, for example there is substantial detail in 'Google Maps'.

If a recent land use map had been examined and compared with the 2006 map, it would have been possible to use that information to draw more precise inferences about changes to habitats since the mapping survey report of 2007.

Response:

The SEA identifies the likely significant effects of implementing the Proposed Variation. The most recent existing information as made available by statutory authorities was used to identify the following high level trend in the state of biodiversity and flora and fauna:

'Changes in land cover indicated by the CORINE data (see Figure 3.6 for 2000-2006 changes and Figure 3.7 for 1990-2000 changes) indicate that semi natural areas within the Proposed Variation area have been replaced by uses which generally include impermeable surfaces. These changes are also likely to result in losses of biodiversity and flora and fauna.'

Precise quantifications of changes to habitats since the 2007 habitat mapping survey were not considered necessary to the identification of the likely significant effects of implementing the Proposed Variation nor would such quantifications change the conclusions of the SEA.

Updates to ER or AA Arising:

The baseline contained in the Environmental Report is being reviewed in order to ensure that it contains the most appropriate, up to date sources of information.

2.1.2.2 Population and Human Health

3.4.3 Existing Problems

'Although air quality in the Proposed Variation area meets current standards, traffic "hotspots" may give rise to a harsh sensory environment which may impact upon human health'.

Comment

Since no data are presented on air quality, there is no basis for this statement that air quality in the Proposed Variation area meets current standards.

Response:

It is acknowledged that this statement needs to be further clarified taking into account other information provided in Section 3 of the ER.

With regard to air quality in the wider zone in which Sandyford is located, Section 3.8 *Air and Climatic Factors* of the ER states:

'....In order to comply with the directives mentioned above, the EPA measures the levels of a number of atmospheric pollutants. For the purposes of monitoring in Ireland, four zones are defined in the Air Quality Standards Regulations 2002 (SI No. 271 of 2002). The main areas defined in each zone are:

- Zone A: Dublin Conurbation.
- Zone B: Cork Conurbation.
- Zone C: 21 Other cities and large towns comprising Galway, Limerick, Waterford, Clonmel, Kilkenny, Sandyford, Drogheda, Wexford, Athlone, Ennis, Bray, Naas, Carlow, Tralee and Dundalk.
- Zone D: Rural Ireland, i.e. the remainder of the State small towns and rural areas of the country excluding Zones A, B and C.

The Proposed Variation area falls within Zone A, as mapped on Figure 3.27. In this area, Zone A is also a Coal Restricted Ares. Zone D is visible in the south west of the Proposed Variation area. Air quality in both Zone A and Zone D is currently good....'

With regard to problems relating to air quality the ER states:

- 'Traffic hotspots within the Proposed Variation area are likely to have elevated levels of air pollution and noise due to traffic congestion.'
- 'Localised air pollution incidences with regard to PM10 and PM2.5 and noise pollution are both likely to occur when demolition/construction takes place - especially in relation to PM10 if suppression techniques are not introduced - and when traffic is queuing for long periods of time.'

It is therefore recommended to update the ER as detailed below.

Updates to ER or AA Arising:

Replace the following sentence in Section 3.4.3 of the ER:

 'Although air quality in the Proposed Variation area meets current standards, traffic "hotspots" may give rise to a harsh sensory environment which may impact upon human health.'

With:

 Air quality as assessed by the EPA in the wider Dublin Conurbation Air Quality zone in which Sandyford is located is assessed as being currently good and meeting relevant standards. 'However local air quality issues may occur within and adjacent to the Variation lands e.g. traffic "hotspots" may give rise to a harsh sensory environment which may impact upon human health and localised PM10 and PM2.5 air pollution incidences is likely to occur when demolition/construction takes place.

2.1.2.3 Air and Climatic Factors

3.8.1.2 Air Zones

In Dun Laoghaire — Rathdown, the current air quality monitoring site is on Glenageary Road, a suburb near the sea. The SBD is located between the M50 and the N11 and has substantial traffic congestion. It is an air pollution 'hot spot' and as such should have a specific assessment of air quality.

3.8.3 Noise

EU Directives on noise mapping were put in place some years after those on air quality. Work is under way to develop 'noise maps' of the Dublin Agglomeration. Ireland does not as yet have statutory limit values for noise, as is the case for air pollution.

Comment

Some local information is available from EISs for local developments (e.g. the Allegro site, early 2005) and in reports prepared for DLRCC to obtain planning permission for the Upgrade of the M50 (late 2004) and the building of the Sandyford Industrial Estate Link Road (Spring 2005).

After reviewing the written submissions and the Oral Hearing on the Upgrade of the M50, an Bord Pleanála granted planning permission subject to a number of conditions (06D.ER.2034, April 2005), including:

3(2) Continuous monitoring facilities for Nitrogen Dioxide (N02) and Particulates (PM10) shall be established by the road authority adjacent to (1) the eastern quadrants of the N4 / M50 interchange and (2) to the western quadrants of the Sandyford interchange and maintained there for at least seven years after the M50 Motorway Upgrade Scheme has been completed with the results made available at the relevant local authorities' websites, local area offices and libraries at six-monthly intervals.

These data should now be accessed and reviewed by CAAS as a basis for assessing air quality in the SBD. They should also be made available to local residents, as required by An Bord Pleanála.

Response:

The ER includes an assessment of the likely significant environmental effects of the provisions of the Proposed Variation in Sections 7 and 8. The specific identification of potential effects on air quality occurs repeatedly throughout this assessment.

In compliance with the European principle of subsidiarity, primary data collection will be undertaken by lower tier environmental assessments as relevant and appropriate.

The identified EISs and monitoring facilities will be examined for baseline information relating to air quality and noise and the availability of information under the identified planning condition will be investigated. The ER may be updated as relevant and appropriate.

Updates to ER or AA Arising:

The baseline contained in the Environmental Report is being reviewed in order to ensure that it contains the most appropriate, up to date sources of information.

2.1.3 Conclusions and Recommendations

- 1. The SUFP makes an honest effort to address the environmental challenges resulting from the piecemeal planning in the area to date.
- The SUFP has specific proposals to address environmental infrastructure, including foul drainage, surface water drainage and water supply. These objectives are within the capacity of the Council to deliver.
- 3. There are almost no recent local data included in the ER, for example in relation to land use or air quality.
- 4. Air quality monitoring data collected as a condition of the planning permission for the Upgrade of the M50 should be accessed and should inform further planning in the area.
- 5. The triangle encompassing the M50 and the SBD, the N11, and Stillorgan village should be assessed as an air quality 'hot spot' and (in accordance with legislation) air pollution and noise levels should be quantified. The study should be of sufficient quality to provide a context for EISs for individual developments which are likely in the years to come for sites purchased during the boom years.
- 6. Despite the absence of quantitative data, the proposals of the SUFP are based on the assumption that the area has problems with traffic congestion. Specific proposals are made to reduce these problems and increase walking and cycling; these strategies will also help to address trafficrelated air pollution and noise levels. Implementation will be managed on the basis of the progress required prior to planning permission being granted for additional development.

Response:

- 1. This is noted.
- 2. This is noted.
- 3. In compliance with the SEA Directive and in order to describe the baseline (the current state of the environment) at Sandyford, data was collated from currently available, relevant environmental sources. See also response regarding land cover under Section 2.1.2.1 and response relating to air quality under Section 2.1.2.3.
- 4. See response under Section 2.1.2.3.
- 5. See response under Section 2.1.2.3.
- 6. This is a matter for the Planning Authority.

Updates to ER or AA Arising:

- None.
- None.
- 3. See updates to ER or AA arising under Sections 2.1.2.1 and 2.1.2.3.
- 4. See updates to ER or AA arising under Section 2.1.2.3.
- 5. See updates to ER or AA arising under Section 2.1.2.3.
- 6. None.

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2.2 Submission No. V2064: Eamon Ryan

2.2.1 Point 1

It is uncertain from the SUFP how existing water, sewage and transport infrastructure will cope with the proposed scale of development.

Response:

Measures which have been integrated into the Proposed Variation and measures which are currently in force through the existing County Development Plan will help to ensure that new development is accompanied by appropriate levels of infrastructure.

Measures integrated into the Proposed Variation include:

Sustainable Mobility¹

- Overall strategy/provisions adopted by the SUFP
- Height Policy SUFP3 and Objectives BH1, BH2 and BH3
- Public Realm Policy SUFP 4 and Objectives PR1, PR2, PR3, PR5, PR6, PR7 and PR8
- Way Finding Policy SUFP 5 and Objectives WF1, WF2 and WF3
- Infrastructure Policy SUFP6
- Multi Modal Transport Infrastructure Policy SUFP7 and Objectives TAM1 to TAM12, TAM14, TAM18 and TAM20
- Density Policy SUFP2 and Objectives DS1 to DS4
- Various Community Infrastructure provisions, including those relating to open space, community facilities and education
- Phasing Objectives P1 and P6
- Funding Policy SUFP13 and Objective M1
- Specific Local Objectives 109 to 114 and 116 to 121

Water Services Infrastructure²

- Infrastructure Policy SUFP6
- · Foul Drainage Objectives FD1 to FD3
- Water Supply Objectives WS1 & WS2
- Phasing Objectives P7 and P8

Drainage Infrastructure³

- Infrastructure Policy SUFP6
- Surface Water Objectives SWD1 and SWD2
- Public Realm Objective PR10

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¹ Note that these measures are likely to benefit:

reductions in transport related greenhouse gas emissions;

[•] a modal change from car to more sustainable forms of transport; and,

the protection of human health with regard to transport related air and noise emissions.

² Note that these measures are likely to benefit:

[•] the provision of appropriate waste water treatment;

[•] the provision of sufficient quality and quantity of drinking water;

[•] the protection of the quality of water bodies; and,

[•] the protection of biodiversity.

³ Note that these measures are likely to benefit:

[·] the minimisation of flood risk; and,

[•] the protection of human health.

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Measures in force through the existing County Development Plan include those which have been integrated into the County Development Plan through Policy LHB27:

- Waste Water I Development under the Plan shall be preceded by sufficient capacity in the public waste water treatment plants and appropriate extensions in the existing public waste water treatment catchments.
- Waste Water II The Council shall implement the relevant recommendations set out in Urban Waste Water Discharges in Ireland for Population Equivalents Greater than 500 Persons – A Report for the Years 2006 and 2007 (EPA Office of Environment Enforcement, 2009).
- Waste Water III The Council shall examine the feasibility of connecting of unsewered, areas including individual properties/ premises, serviced by septic tanks to existing and planned sewer networks.
- Drinking Water I Dún Laoghaire-Rathdown County Council shall ensure conformance with the relevant recommendations set out in The Provision and Quality of Drinking Water in Ireland - A Report for the Years 2007-2008 (EPA Office of Environment Enforcement, 2009).
- Drinking Water II Existing and new populations under the CDP shall be served with clean and wholesome drinking water. The Council will help to ensure that compliance is achieved as a minimum with regard to the 48 parameters set out under the European Communities (Drinking Water) Regulations (No. 2) 2007 and will help to resolve any issues if they arise in order to achieve the removal of public water supplies from the EPA remedial action list of public water supplies.
- Flooding III It is Council policy to implement the recommendations of the most recent version of the Department of the Environment, Heritage and Local Government and the Office of Public Works Guidelines on "The Planning System and Flood Risk Management" including using the Guidelines to assess applications for planning permission.
- Flooding IV The Council shall fulfil its responsibilities under the Flood Risk Directive 2007/60/EC and it is Council policy to assist and cooperate with the Office of Public Works in developing Catchment-based Flood Risk Management Plans. Any recommendations and outputs arising from the Flood Risk Management Plans for Dún Laoghaire-Rathdown will require to be incorporated into the Development Plan.
- Flooding V It is Council policy to ensure that all development proposals incorporate
 Sustainable Urban Drainage Systems (SUDS).
 Transportation I It is Council policy to introduce traffic calming and traffic
 management schemes on particular roads and in appropriate areas throughout the
 County to effect an overall reduction in vehicle speeds to an acceptable level and to
 reduce the potential for traffic congestion and associated vehicular emissions in

Updates to ER or AA Arising:

urban areas.

None.

2.2.2 Point 2

I have concerns about the lack of green and civic space provided in the proposal.

Response:

Measures integrated into the Proposed Variation which will benefit the provision of Open Space⁴ include:

- Open Space Objective F Zone 7 and Objectives F1 to F6
- Open Space Policy SUFP8 and Objectives OS1 to OS4
- Public Realm Objectives PR8 and PR9
- Phasing Objective P1
- Specific Local Objectives 115 and 121

Updates to ER or AA Arising:

None.

2.2.3 Point 3

I am also concerned about the lack of integration with existing estates with regards to building heights and the negative impact this may have on residents in the surrounding areas.

Response:

Measures integrated into the Proposed Variation which will benefit the protection of residential amenity with regard to potential effects arising from the height of new buildings include:

- Policy SUFP3
- · Objectives BH1 and BH2

Updates to ER or AA Arising:

None.

2.2.4 Point 4

10

I welcome the Strategic Environmental Assessment report. However I would like to support the concerns raised by local residents about the quality of the data used in this assessment, and the lack assessment of potential air and noise pollution due to the increase in traffic congestion from the proposed road building proposals.

Response:

In compliance with the European principle of subsidiarity, primary data collection will be undertaken by lower tier environmental assessments as relevant and appropriate.

⁴ Note that these measures are likely to also benefit:

the protection of local habitats;

[·] the protection of residential amenity;

[·] the protection of cultural heritage and its setting; and,

[·] the availability of flood risk management options.

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The ER includes an assessment of the likely significant environmental effects of the provisions of the Proposed Variation in Sections 7 and 8. The specific identification of potential effects on air quality and noise occurs repeatedly throughout this assessment.

Updates to ER or AA Arising:

The baseline contained in the Environmental Report is being reviewed in order to ensure that it contains the most appropriate, up to date sources of information (see response under Section 2.1.2.3).

2.2.5 Point 5

Finally I still contend that the Dun Laoghaire Rathdown Council Council should be managing the Sandyford Business Estate within the context of a Local Area Plan for the whole area which would have real statutory effect and would adequately examine the future mix of uses, provide sufficient transport and other infrastructure plans to cope with increased demands, and an overall design concept for this development.

Response:

This is a matter for the Planning Authority.

Updates to ER or AA Arising:

None.

2.3 Submission No. V2051: Environmental Protection Agency

2.3.1 Cover Letter

2.3.1.1 Point 1

We refer you to Annex 1 of Directive 2001/42/EC (SEA Directive) and Schedule 2 of European Communities 2B of S.I. No. 436 of 2004- Planning and Development Strategic Environmental Assessment) Regulations 2004 for "Information to be contained in an Environmental Report".

Response:

This is noted. Table 2.1 included in the ER is a reproduction of the "Information to be contained in an Environmental Report" and includes the relevant sections of the ER that deal with these requirements.

Updates to ER or AA Arising:

None.

2.3.2 Section 1: Integration of Environmental Considerations in the Land Use Plans

2.3.2.1 Point 1

The Proposed Variation No. 2 to Dun Laoghaire Rathdown County Development Plan, hereafter referred to as the Plan, should be set in the context of the planning hierarchy and a clear statement should be provided as to the function of the Plan and what the Plan can and cannot do. Where other Plans/Programmes/Strategies are responsible for implementing relevant policies / objectives / initiatives, these should be acknowledged and fully referenced in the Plan.

Response:

This is a Variation to the County Development Plan 2010-2016. The hierarchy of planning guidelines and strategies is dealt with in the County Development Plan 2010-2016, of which this Variation will be part.

Updates to ER or AA Arising:

None.

2.3.2.2 Point 2

Consideration should also be given to establishing a traffic management plan for the Plan area which should also taken into consideration potential for transport related air quality and noise pollution issues.

Response:

Measures relating to sustainable mobility⁵ have been integrated into the Proposed Variation and are currently in force through the existing County Development Plan.

Updates to ER or AA Arising:

None.

2.3.2.3 Point 3 Summary of Key Issues and Key Recommendations

a) Water Quality

It should be ensured that the Eastern River Basin District River Basin Management Plan is integrated as appropriate into the Plan to ensure surface and ground water quality is protected / improved as appropriate.

b) Ensure adequate and appropriate infrastructure

It should be ensured that adequate and appropriate critical service infrastructure is in place to be able to service the development of the Plan area. Development within the Plan area should be subject to this infrastructure being in place prior to development being granted in the interests of ensuring sustainable development.

Response:

- a) See Policy LHB27 of the County Development Plan
- b) See response under Section 2.2.1.

Updates to ER or AA Arising:

None.

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2.3.2.4 Point 4 Various Recommendations and Comments

After identifying the 2 key recommendations identified under Section 2.3.2.3 above, the EPA make a number of comments and recommendations under the headings of water, biodiversity, air, noise and climatic factors, energy conservation/renewable energy, landscape character assessment, human health, quality of life, infrastructure planning, urban waste water discharge licensing management, Environmental Impact Assessment, Strategic Environmental Assessment, obligations with respect to national plans and EU environmental legislation and Report: Ireland's Environment 2008.

⁵ Note that these measures are likely to benefit:

[·] reductions in transport related greenhouse gas emissions;

a modal change from car to more sustainable forms of transport; and,

[•] the protection of human health with regard to transport related air and noise emissions.

Response:

All relevant comments and recommendations have already been taken into account by the SEA and Plan preparation process. In particular, see the SEA Environmental Report, the Proposed Variation and the County Development Plan.

Updates to ER or AA Arising:

None.

2.3.3 Section 2: Environmental Report

2.3.3.1 Point 1

In assessing the potential for likely significant effects, clarification should be given how the full range of likely significant effects (including cumulative effects) as required under the SEA Directive has been taken into consideration. You are referred to Schedule 2B (f) of S.I. No. 436 of 2004 in this regard.

Response:

See Section 8.1 of the Environmental Report which describes the methodology employed in the assessment. Note that, in accordance with Schedule 2B (f) of S.I. No. 436 of 2004, the effects considered by the assessment include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.

Updates to ER or AA Arising:

None.

2.3.3.2 Point 2

It should be ensured that adequate and appropriate critical service infrastructure is in place to be able to service the development of the Plan area. Development within the Plan area should be subject to this infrastructure being in place prior to development being granted in the interests of ensuring sustainable development.

Response:

Measures which have been integrated into the Proposed Variation and measures which are currently in force through the existing County Development Plan will help to ensure that new development is accompanied by appropriate levels of infrastructure. Also see 'response' under Section 2.2.1.

Updates to ER or AA Arising:

None.

2.3.3.3 Point 3

The list of included mitigation measures is acknowledged, however in the interests of clarity, consideration should be given to inclusion of a summary table highlighting the key specific mitigation measures for each of the SEO's in order to show how the particular vulnerabilities / sensitivities have been adequately addressed. In addition, there would also be merits in including this table in the non-technical summary.

Response:

Section 11 of the ER and Section 5 of the non-technical summary provide summary tables outlining how likely significant effects (if unmitigated) are linked to relevant mitigation measure(s) - which have been integrated into the Proposed Variation or which are already in force under the existing County Development Plan (CDP) (Policy LHB27 - see Section 9) - and indicator(s) which will be used for monitoring.

All indicators are linked to the SEOs identified in Section 4 of the Environmental Report and they share the same codes e.g. SEO B1 is linked to Indicator B1. This will be noted in Section 11 of the ER and Section 5 of the non-technical summary.

Updates to ER or AA Arising:

To note in Section 11 of the ER and Section 5 of the non-technical summary that:

All indicators are linked to the SEOs identified in Section 4 of the Environmental Report and they share the same codes e.g. SEO B1 is linked to Indicator B1.

2.3.3.4 Point 4

For the Environmental Protection Objectives, consideration should be given to the development of additional relevant Environmental Objectives and associated Targets and Indicators for assessing environmental impact, including: Sustainable use of natural resources; Energy conservation; Water conservation.

Given that the existing SEO®s for biodiversity only refer to Natura 2000 sites, it should be ensured that nationally designated conservation sites (NHA®s) should be afforded significant protection under the Plan also. In this regard, consideration should be given to inclusion of a specific SEO to protect NHA®s or amending one of the existing Biodiversity SEO®s to take account of nationally designated conservation sites.

Response:

As noted in Section 4 of the ER:

The SEA Directive requires that the evaluation of plans and programmes be focused upon the relevant aspects of the environmental characteristics of areas likely to be significantly affected. In compliance with this requirement, the SEA has focused upon the most relevant aspects of the environmental characteristics within and surrounding the Proposed Variation lands. SEOs relating to these environmental characteristics have been identified and developed for the SEA. Most attention has been given to environmental components which are likely to be impacted as a result of implementation of the Variation.'

SEOs are not covered under the headings of 'sustainable use of natural resources'; 'energy conservation' or 'water conservation' and it is not considered necessary to add additional SEOs under these headings.

Other SEOs cover aspects of the topics as follows:

- Sustainable use of natural resources SEOs B1, B2, S1, W1, W2 and M1
- Energy conservation SEOs C1 and C2
- · Water conservation' SEO W1

Updates to ER or AA Arising:

None.

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2.3.3.5 Point 5

Clarify how the full range of environmental effects of the implementation of the Plan, as set out in the SEA Directive and Regulations, i.e. "secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects" have been assessed and documented. The use of a table to summarize the assessment of environmental effects should be considered.

Response:

See response under 2.3.3.1.

Updates to ER or AA Arising:

None.

2.3.3.6 Point 6

Mitigation measures proposed should be directly linked to the specific relevant significant effects identified in the Environmental Report. There would be merits in providing a summary table outlining how each significant effect is linked directly to relevant mitigation measure(s), monitoring measure(s) and, where appropriate a specific Policy or Objective in the Plan.

Response:

Such a table is provided in Section 11 of the ER and Section 5 of the non-technical summary.

Updates to ER or AA Arising:

None.

2.3.3.7 Point 7

Consideration should be given to the following:

- a) The addition of appropriate corrective action thresholds for unauthorised development, illegal waste activity and water pollution incidents not involving oil spills.
- b) Monitoring of both positive and negative effects, where they occur.
- c) Inclusion of the on-going review of environmental targets and indicators in the monitoring programme. Responsibility for this role should be clearly defined.
- d) The Monitoring Programme should be flexible to take account of the various stages of the Plan and should be able to deal with specific environmental issues as they arise.
- e) The programme must be able to deal with the possibility of cumulative effects.
- f) While the monitoring programme sets out the various sources of data, the actual departments responsible for collecting, collating and analysing the data should be identified as soon as possible after the Plan has been adopted.
- g) The Monitoring Programme should include information on how the monitoring proposed will allow unforeseen adverse effects to be identified and responded to as appropriate. Who has responsibility for this? What will trigger appropriate remedial action?

Response:

- a) Thresholds at which corrective action will be considered include (as stated in Section 10.6 of the ER): the occurrence of flood events; court cases taken by the DEHLG regarding impacts upon archaeological heritage including entries to the Record of Monuments and Places; and, complaints received from statutory consultees regarding avoidable environmental impacts resulting from development which is granted permission under the County Development Plan as varied. The corrective actions suggested are not considered appropriate to the Monitoring Programme for this level of the Planning hierarchy and may be considered by lower tier assessments with regard to the construction and operation of individual developments.
- b) The indicators selected provide for the assessment of positive and negative effects.

- c) This is noted.
- d) The Monitoring Programme has been developed so that it is flexible and able to deal with specific environmental issues as they arise.
- e) The indicators selected provide for the assessment of cumulative effects.
- f) This is a matter for the Planning Authority. The programme provides for the collection, collation and analysis of the data.
- g) All effects will be identified by the indicators which are included in Section 10 of the ER. Responsibilities and thresholds at which corrective action will be considered are identified in this section also.

Updates to ER or AA Arising:

- a) None.
- b) None.
- c) To amend sentence in Section 10.5 of the ER as follows:

Dún Laoghaire-Rathdown County Council is responsible for collating existing relevant monitored data, **the on-going review of environmental targets and indicators,** the preparation of preliminary and final monitoring evaluation reports, the publication of these reports and, if necessary, the carrying out of corrective action.

- d) None.
- e) None.
- f) None.
- g) None.

2.3.4 Section 3: Development Plan⁶

2.3.4.1 Point 1

The specific comments below relate to the Draft Plan. Comments and suggestions in this Section are put forward for consideration.

- Section 2: Future Land Uses
- Consideration should be given to amending Objective OE1 to refer to "...**sustainable** office and enterprise development..."
- Section 8 Evaluation of Proposed Variation Provisions
- Consideration should be given to amending Policy SUFP6 as follows "...to cater for the planned future sustainable development ...".

Response:

This is a matter for the Planning Authority. It is noted that by including the term 'sustainable' the likelihood of potential adverse effects arising from these provisions would be reduced but would still exist.

Updates to ER or AA Arising:

None.

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⁶ Note it is assumed that this Section refers to the Proposed Variation

PART 5

LIST OF SUBMISSIONS

PART 5 Submissions

77 submissions to the proposed Variation No.2 to the County Development Plan 2010-2016 were received during the 4 week public consultation period 10^{th} January to 7^{th} February 2011.

Each submission has its own individual reference number eg: V2001.

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

Name	Organisation	Ref No	Site/Location	Topic
Asple Rosemary		V2040	General	Building Height, Open Space, Water Supply & Foul Drainage, Unfinished Developments
Brennan Adam		V2036	General	Building Height, Open space, Community Facilities, Water Supply & Fould Drainage capacity, Unfinished Developments
Browne Patrick		V2026	Harcourt Street Railway Line	SLO 118 Pedestrian Link and Cycleway
Carolan Margaret		V2001	Harcourt Street Railway Line	SLO 118 Pedestrian Link and Cycleway
Cashman Tadgh		V2017	General	Various inc: Building Height, Open spaces, public realm, Infrastructure capacity, Water supply, Foul Drainage, Community facilitie
D'Alton Karan		V2044	Three Rock Road	Zone 5 'A2', Sustainable Residential Neighbourhoods, Re-zoning
Dennison Andrew		V2002	Harcourt Street Railway Line	SLO 118 Pedestrian Link and Cycleway
Gallagher Colette		V2016	General	Building Height, Open Space Community facilities, Water Supply, Foul Drainage, Unfinished development
Hogan Louis		V2007	Harcourt Street Railway Line	SLO 118 Pedestrian Link and Cycleway
Holmes John		V2039	General	Building Height, Open Space, Water Supply & Foul Drainage, Unfinished Developments
Kiernan Alan & Audrey		V2003	Harcourt Street Railway Line	SLO 118 Pedestrian Link and Cycleway
Mitchell Derek		V2023	General, Three Rock Road	Sustainable Residential Neighbourhood, Public Transport, Parks, Funding
O'Sullivan Joyce		V2011	Harcourt Street Railway Line	SLO 118 Pedestrian Link and Cycleway
O'Sullivan Joyce		V2067	Harcourt Street Railway Line	SLO118 Pedestrian Link and Cycleway
Ryan TD Eamon		V2064	General	Legal Status, Unfinished Developments, Open Space, SEA Assessment
Swanton D		V2077	General	Legal Status, LAP -v- UFP
Toner Thomas		V2014	Harcourt Street Railway Line	SLO 118 Pedestrian Link and Cycleway
Toner Thomas		V2015	Harcourt Street Railway Line	SLO 118 Pedestrian Link and Cycleway
Toner Thomas		V2021	Harcourt Street Railway Line	SLO 118 Pedestrian Link and Cycleway
Whelan David		V2041	General	Building Height, Open Space, Water Supply & Foul Drainage capacity constraints, Unfinished Developments, Plot Ratio,
Sadler Trevor McGill Planning on behalf of	7 individuals	V2031	Furze Road, Heather Road, Bracken Road	Various Inc: Development Strategy, Design Principles, Quantum Development, Transport, Funding, Phasing,
Dowling Paddy Killiney Design Associates on behalf of	Abingdon Investment Trust	V2024	28 Corrig Road	Open Space Zoning and Policy

Name	Organisation	Ref No	Site/Location	Topic
Quigley Leona John Spain Associates on behalf of	Aviva Investors	V2065	Heather Road	Land Use Zoning Objectives, Roads Objectives, Plot Ratio, Building Height, Phasing & Funding
McGill Colin McGill Planning on behalf of	Brackville Holdings Ltd	V2071	Former FAAC site Burton Hall Road	Development Strategy, Quantum Development, Phasing, Funding, Public Consultation, Land Use Zoning, Plot Ratio, Density, Height,
McGill Colin McGill Planning on behalf of	Brunello Ltd	V2069	Burton Hall/Arena Road	Plot Ratio, Land Use Zoning, Building Height, Public Realm, Open space, Roads Infrastructure, Design Principles, Dev Quantum
O'Brien Mark	Cedarhurst Developments	V2061	Jct Blackthorn Avenue/Arkle Road (former Tetrapak)	Building Height
McGill Colin McGill Planning on behalf of	Colgan & Ryan Group	V2070	Sandyford Business District	Development Strategy, Vision, uantum Development, Phasing, funding, Land Use Zoning, Plot ratio, Building Height, Design principle
McGill Colin McGill Planning on behalf of	CWWB Partnership	V2073	Former Siemens Site Crn Ballymoss Rd/Blackthorn Rd	Quantum, Phasing, funding, Public consultation, Land Use Zoning, Open Space, Plot Rati
Kuunz Rory RPS Planning & Environment on behalf of	Cyril Maguire	V2042	4.5ha within IDA SCBP	Land Use Zoning 'OE', Plot Ratio, Building Height, Roads objectives, SLO115, Design Principles
Brogan Jim on behalf of	Davy Capital Growth Fund	V2018	Mercury House/Ravenscourt Business Park/SBE	A2 Sustainable Residential Neighbourhood
Connolly Clare	Department of Education and Skills	V2005	General	SLO112, Education zoning in SUFP noted
Conaty Carmel	Dept of Communications Energy & Natural resources	V2006	General	Noted no observations IFI
Assaf Phillip	Durkan New Homes	V2028	Arkle Road	Funding, Phasing, Transport/Environmental Infrastructure
Strong Jean Declan Brassil & Co Ltd on behalf of	Eircom Ltd	V2033	11 & 12 Holly Avenue	SLO112 - conflicting objectives, Land Use Zoning, Plot Ratio
Strong Jean Declan Brassil & Co Ltd on behalf of	Eircom Ltd	V2034	Blackthorn Road	Plot Ratio, Building Height, Land Use Zoning 'OE'
Kenny Brian	Environment Heritage & Local Government	V2004	General	Urban Form, Public Realm, Linkages, Building Height, Density, Open Space Movement
O'Mahony Cian	Environmental Protection Agency	V2051	General	SEA, Environmental Objectives, Water/Waste Services, Habitats and Species Appropriate Assessment

Name	Organisation	Ref No	Site/Location	Topic
Gannon John	ESB	V2030	Leopardstown Road	Land Use Zoning, Building Height,
Tom Phillips & Associates on				Phasing/Funding
behalf of				
Cullen J A	Eurosales Ltd	V2035	Three Rock Road	Land Use Zoning - Residential Zone 'A2'
Byrne Conor	Green Property	V2045	General	Various inc: Plot Ratio, Building Height,
				Infrastructure, Funding/phasing, Roads Objectives
				- M50 southbound exit
Davis Pat	IDA ireland	V2049	South Co Business Park	Open Space, Land Use Zoning, Re-Zoning
Clifton Scannell Emerson				
Associates on behalf of				
Brogan Jim	IDA Ireland Ltd	V2075	South County Business Park	Land Use Zoning, Phasing, Roads Infrasructure,
on behalf of				Open Space
Sadler Trevor	James Maguire & Hugh	V2027	40, 74/75 Heather Road	Land Use Zoning - Light Industrial/Warehousing,
McGill Planning Ltd on behalf of	Quigley	1/2057		Plot Ratio, Building Height
Gannon John	Judd Developments Ltd (in	V2057	Sandyford Gateway at Beacon	Land Use Zoning 'MH', Plot Ratio, Building Height,
Tom Phillips & Associates on	Receivership)		Court	Roads Infrastructure
behalf of Dineen Sean	Lakelands Residents	V2008	Blackthorn Road/Sandyford	Various inc: Building Height, Unfinished
on behalf of		V2008	Blackthorn Road/Sandylord	
on benail of	Association			Developments, Open Space, Roads, Water, Foul Drainage, Population
Kelly Sine	Legionaries of Christ	V2029	3.97 hecatres	Various inc: SLO112 Education - Institutional
Tom Phillips & Associates on	Legionaries of Christ	V2029	3.97 flecaties	objective Maps 1-3, Plot Ratio, Building Height,
behalf of				Land Use Zoning, Roads Objectives
Saunders Donal	Mazars	V2063	Beacon South Quarter	Land Use Zoning Objectives
The O'Toole Partnership on	Mazars	V2003	Beacon South Quarter	Land osc Zonnig Objectives
behalf of				
Raftery Bernard	Merville Residents Association	V2076	General	Unfinished Development, Open Space, Amenity,
rtarter, zernara		12070	30.10.0.	Building Height, Infrastructure Deficits
Byrne Auveen	Mr David Arnold	V2060	Crnr Carmanhall Rd/Blackthorn	Various inc: Land Use Zoning, SLO116 -
Auveen Byrne & Associates on		1 - 2 - 2 - 2	Rd	conflicting with Land Use Zoning, SLO113
behalf of				Community Facilities, Residential Density,
Byrne Auveen	Mr John Maybury	V2059	Site at Maple House South Co	Land Use Zoning, Residential Density, Building
Auveen Byrne & Associates on	, , , ,		Business Park	Height, Development Quantum & Infrastructure
behalf of '				Cpacity, Phasing, Open Space
O'Crowley Harry	Naomh Olaf GAA Club	V2068	General	Open Space - Class 1 at St Benildus, Reservoir,
				Land Use Zoning, Education
Morgan Olivia	National Roads Authority	V2043	General	Sustainable Travel Mobility Management, 6-yr
	, ·			Roads objectives, Long-term Roads objectives
O'Donovan Conor	National Transport Authority	V2054	General	Phasing, Roads Infrastructure, Car Parking,
	,			Mability Management Plan

Name	Organisation	Ref No	Site/Location	Topic
McGrandles Ian Tiros Resources Ltd on behalf of	Oceanscape Ltd	V2053	Blackthorn Drive	Land Use Zoning, Building Height, Plot Ratio, SLO112 Education, Urban Form - Design Principles
de Roiste Natalie Tiros Resources Ltd on behalf of	Owen Owens	V2055	Bracken Court	Land Use Zoning, Building Height - Development Management, Density, Plot Ratio, Car Parking
de Roiste Natalie Tiros Resources Ltd on behalf of	Owen Owens	V2056	Spruce Avenue, Holly Avenue, Maple Avenue	Land Use Zoning, Plot Ratio, Building Height, Scale and Density
Sharkey Joe John Duffy Architecture on behalf of	Owners/Occupiers Units 56a &56c Blackthorn Road	V2046	56a and 56c Blackthorn Road	Building Hieght, Land Use Zoning
Jacobi Kathleen	Railway Procurement Agency	V2020	General	Various inc: Public Transport, Permeability, sustainable Transpport, Mobility Management, Density and Scale
Quigley Leona John Spain Associates on behalf of	Royal College of Surgeons	V2050	reservoir House, Ballymoss Road	SLO121, Plot Ratio, Building Height, Open space, Foul Drainage, Phasing.Roads, Kand Use Zoning, Public Transport
Quaille Darran Simon Clear Planning & Development Ltd on behalf of	Sandyford Forum Developments Ltd	V2012	Heather Road	Plot Ratio, Building Height
Quaille Darran Simon Clear Planning & Development Ltd on behalf of	Sandyford Forum Developments Ltd	V2013	Blackthorn Avenue	Design principles, Plot ratio
Coffey Paul	SoftCo Ltd	V2047	Softco Land SCBP	Land Use Zoning, Open Space, Pedestrian footpaths
Rowe David on behalf of	South Co Dublin Assoc of An Taisce	V2009	Sandyford	Building Height, Public Transport, Roads Objectives
Maher Andy Aztec Properties Ltd on behalf of	Stafford Family Co-Ownership	V2062	47 Furze Road	Plot Ratio, 2007 SUFP. Infrastructure Capacity
	Stillorgan District Community & Residents Alliance	V2048	Greater Stillorgan Area	Public Consultation, Quantum Development, Phasing, Unfinished Developments, Building Height, Water & Foul Drainage, Open Space,
Gilligan Gerard	Stillorgan Heath Residents Association	V2010	Reservoir/Sandyford/Siemens Site	Various inc: Community infrastructure, Open Space, Building Height, Legal Status of SUFP, Development quantum, SLO 109
Peregrine Edward on behalf of	Stillorgan Wood Residents Association	V2019	General	Legal Status of SUFP, Building Height, Unfinished Developments, Open Spaces, Water Supply
O'Malley Kiaran Kiaran O'Malley & Co Ltd onbehalf of	T J O'Connor & Associates	V2038	Corrig Road	Land Use Zoning, Ope Space, Residential Zone 5 'A2'

PART 5 Submissions

Name	Organisation	Ref No	Site/Location	Topic
Harris Gregory Tesco Ireland Ltd		V2032	General	Land use Zoning - Retail, Presriptive -Maps 1-3
GVA Planning on behalf of				
Byrne Auveen	The Marketing Institute of	V2058	South Co Business Park	Land Use Zoning, Residential Density, Building
Auveen Byrne & Associates on	Ireland			Height, Development Quantum & Infrastructure
behalf of				capacity, Phasing, Open Space
McGill Colin	The Sandyford Business	V2074	Sandyford Business District	Vision for future, Development Strategy,
McGill Planning on behalf of	District Alliance			Guidance, Delivery of Infrastructure, Phasing,
				Funding
McGill Colin	The Sandyford Business	V2072	Sandyford Business District	Vision, Development Strategy, Quantum, Public
McGill Planning on behalf of	Estates Association			Realm, Phasing & Funding, Public Consultation
Gannon John	Topgallant Ltd	V2037	Holly Avenue	SLO112 Education, Land Use Zoning, Plot Ratio,
Tom Phillips & Associates on				Building Height, Infrastructural Defecit,
behalf of				Phasing/Funding timeframe required
Turnbull Sorcha	Treasury Holdings	V2052	Central Park	Roads/Environmental Infrastructure,
				Phasing/Funding, Scale and Density
Dowling Paddy	W.D. McKenna ltd	V2025	A2, A3, A4, 1C Three Rock	Residential Zone 5 Sustainable Residential
Killiney Design Associates on			Road	Neighbourhood
behalf of				
D'Arcy Maureen	Wexele	V2066	MJ Flood Site	Land Use Zoning Zones 1 and 2, Residential,
Muir Associates on behalf of				Retail
Borinski Joe	Woodford Residents	V2022	General	Building Height, Open space public realm, Foul
on behalf of	Association			Drainage, Water Supply, Unfinished Development,
				Community Facilities

(2) Numerical List of persons or bodies who made submissions

Ref No	Name/Agent	Organisation	Site Address	Topic
V2001	Carolan Margaret		Harcourt Street Railway Line	SLO 118 Pedestrian Link and Cycleway
V2002	Dennison Andrew		Harcourt Street Railway Line	SLO 118 Pedestrian Link and Cycleway
V2003	Kiernan Alan & Audrey		Harcourt Street Railway Line	SLO 118 Pedestrian Link and Cycleway
V2004	Kenny Brian	Environment Heritage & Local	General	Urban Form, Public Realm, Linkages, Building Height,
		Government		Density, Open Space Movement
V2005	Connolly Clare	Department of Education and Skills	General	SLO112, Education zoning in SUFP noted
V2006	Conaty Carmel	Dept of Communications Energy & Natural resources	General	Noted no observations IFI
V2007	Hogan Louis		Harcourt Street Railway Line	SLO 118 Pedestrian Link and Cycleway
V2008	Dineen Sean on behalf of	Lakelands Residents Association	Blackthorn Road/Sandyford	Various inc: Building Height, Unfinished Developments, Open Space, Roads, Water, Foul Drainage, Population
V2009	Rowe David on behalf of	South Co Dublin Assoc of An Taisce	Sandyford	Building Height, Public Transport, Roads Objectives
V2010	Gilligan Gerard	Stillorgan Heath Residents Association	Reservoir/Sandyford/Siemens Site	Various inc: Community infrastructure, Open Space, Building Height, Legal Status of SUFP, Development quantum, SLO 109
V2011	O'Sullivan Joyce		Harcourt Street Railway Line	SLO 118 Pedestrian Link and Cycleway
V2012	Quaille Darran Simon Clear Planning & Development Ltd on behalf of	Sandyford Forum Developments Ltd	Heather Road	Plot Ratio, Building Height
V2013	Quaille Darran Simon Clear Planning & Development Ltd on behalf of	Sandyford Forum Developments Ltd	Blackthorn Avenue	Design principles, Plot ratio
V2014	Toner Thomas		Harcourt Street Railway Line	SLO 118 Pedestrian Link and Cycleway
V2015	Toner Thomas		Harcourt Street Railway Line	SLO 118 Pedestrian Link and Cycleway
V2016	Gallagher Colette		General	Building Height, Open Space Community facilities, Water Supply, Foul Drainage, Unfinished development
V2017	Cashman Tadgh		General	Various inc: Building Height, Open spaces, public realm, Infrastructure capacity, Water supply, Foul Drainage, Community facilitie
V2018	Brogan Jim on behalf of	Davy Capital Growth Fund	Mercury House/Ravenscourt Business Park/SBE	A2 Sustainable Residential Neighbourhood
V2019	Peregrine Edward on behalf of	Stillorgan Wood Residents Association	General	Legal Status of SUFP, Building Height, Unfinished Developments, Open Spaces, Water Supply
V2020	Jacobi Kathleen	Railway Procurement Agency	General	Various inc: Public Transport, Permeability, sustainable Transpport, Mobility Management, Density and Scale
V2021	Toner Thomas		Harcourt Street Railway Line	SLO 118 Pedestrian Link and Cycleway
V2022	Borinski Joe on behalf of	Woodford Residents Association	General	Building Height, Open space public realm, Foul Drainage, Water Supply, Unfinished Development, Community Facilities

Ref No	Name/Agent	Organisation	Site Address	Topic
V2023	Mitchell Derek		General, Three Rock Road	Sustainable Residential Neighbourhood, Public Transport, Parks, Funding
V2024	Dowling Paddy Killiney Design Associates on behalf of	Abingdon Investment Trust	28 Corrig Road	Open Space Zoning and Policy
V2025	Dowling Paddy Killiney Design Associates on behalf of	W.D. McKenna ltd	A2, A3, A4, 1C Three Rock Road	Residential Zone 5 Sustainable Residential Neighbourhood
V2026	Browne Patrick		Harcourt Street Railway Line	SLO 118 Pedestrian Link and Cycleway
V2027	Sadler Trevor McGill Planning Ltd on behalf of	James Maguire & Hugh Quigley	40, 74/75 Heather Road	Land Use Zoning - Light Industrial/Warehousing, Plot Ratio, Building Height
V2028	Assaf Phillip	Durkan New Homes	Arkle Road	Funding, Phasing, Transport/Environmental Infrastructure
V2029	Kelly Sine Tom Phillips & Associates on behalf of	Legionaries of Christ	3.97 hecatres	Various inc: SLO112 Education - Institutional objective Maps 1-3, Plot Ratio, Building Height, Land Use Zoning, Roads Objectives
V2030	Gannon John Tom Phillips & Associates on behalf of	ESB	Leopardstown Road	Land Use Zoning, Building Height, Phasing/Funding
V2031	Sadler Trevor McGill Planning on behalf of	7 individuals	Furze Road, Heather Road, Bracken Road	Various Inc: Development Strategy, Design Principles, Quantum Development, Transport, Funding, Phasing,
V2032	Harris Gregory GVA Planning on behalf of	Tesco Ireland Ltd	General	Land use Zoning - Retail, Presriptive -Maps 1-3
V2033	Strong Jean Declan Brassil & Co Ltd on behalf of	Eircom Ltd	11 & 12 Holly Avenue	SLO112 - conflicting objectives, Land Use Zoning, Plot Ratio
V2034	Strong Jean Declan Brassil & Co Ltd on behalf of	Eircom Ltd	Blackthorn Road	Plot Ratio, Building Height, Land Use Zoning 'OE'
V2035	Cullen J A	Eurosales Ltd	Three Rock Road	Land Use Zoning - Residential Zone 'A2'
V2036	Brennan Adam		General	Building Height, Open space, Community Facilities, Water Supply & Fould Drainage capacity, Unfinished Developments
V2037	Gannon John Tom Phillips & Associates on behalf of	Topgallant Ltd	Holly Avenue	SLO112 Education, Land Use Zoning, Plot Ratio, Building Height, Infrastructural Defecit, Phasing/Funding timeframe required
V2038	O'Malley Kiaran Kiaran O'Malley & Co Ltd onbehalf of	T J O'Connor & Associates	Corrig Road	Land Use Zoning, Ope Space, Residential Zone 5 'A2'
V2039	Holmes John		General	Building Height, Open Space, Water Supply & Foul Drainage, Unfinished Developments
V2040	Asple Rosemary		General	Building Height, Open Space, Water Supply & Foul Drainage, Unfinished Developments
V2041	Whelan David		General	Building Height, Open Space, Water Supply & Foul Drainage capacity constraints, Unfinished Developments, Plot Ratio,

Ref No	Name/Agent	Organisation	Site Address	Topic
V2042	Kuunz Rory RPS Planning & Environment on behalf of	Cyril Maguire	4.5ha within IDA SCBP	Land Use Zoning 'OE', Plot Ratio, Building Height, Roads objectives, SLO115, Design Principles
V2043	Morgan Olivia	National Roads Authority	General	Sustainable Travel Mobility Management, 6-yr Roads objectives, Long-term Roads objectives
V2044	D'Alton Karan		Three Rock Road	Zone 5 'A2', Sustainable Residential Neighbourhoods, Re-zoning
V2045	Byrne Conor	Green Property	General	Various inc: Plot Ratio, Building Height, Infrastructure, Funding/phasing, Roads Objectives - M50 southbound exit
V2046	Sharkey Joe John Duffy Architecture on behalf of	Owners/Occupiers Units 56a &56c Blackthorn Road	56a and 56c Blackthorn Road	Building Hieght, Land Use Zoning
V2047	Coffey Paul	SoftCo Ltd	Softco Land SCBP	Land Use Zoning, Open Space, Pedestrian footpaths
V2048		Stillorgan District Community & Residents Alliance	Greater Stillorgan Area	Public Consultation, Quantum Development, Phasing, Unfinished Developments, Building Height, Water & Foul Drainage, Open Space,
V2049	Davis Pat Clifton Scannell Emerson Associates on behalf of	IDA ireland	South Co Business Park	Open Space, Land Use Zoning, Re-Zoning
V2050	Quigley Leona John Spain Associates on behalf of	Royal College of Surgeons	reservoir House, Ballymoss Road	SLO121, Plot Ratio, Building Height, Open space, Foul Drainage, Phasing.Roads, Kand Use Zoning, Public Transport
V2051	O'Mahony Cian	Environmental Protection Agency	General	SEA, Environmental Objectives, Water/Waste Services, Habitats and Species Appropriate Assessment
V2052	Turnbull Sorcha	Treasury Holdings	Central Park	Roads/Environmental Infrastructure, Phasing/Funding, Scale and Density
V2053	McGrandles Ian Tiros Resources Ltd on behalf of	Oceanscape Ltd	Blackthorn Drive	Land Use Zoning, Building Height, Plot Ratio, SLO112 Education, Urban Form - Design Principles
V2054	O'Donovan Conor	National Transport Authority	General	Phasing, Roads Infrastructure, Car Parking, Mability Management Plan
V2055	de Roiste Natalie Tiros Resources Ltd on behalf of	Owen Owens	Bracken Court	Land Use Zoning, Building Height - Development Management, Density, Plot Ratio, Car Parking
V2056	de Roiste Natalie Tiros Resources Ltd on behalf of	Owen Owens	Spruce Avenue, Holly Avenue, Maple Avenue	Land Use Zoning, Plot Ratio, Building Height, Scale and Density
V2057	Gannon John Tom Phillips & Associates on behalf of	Judd Developments Ltd (in Receivership)	Sandyford Gateway at Beacon Court	Land Use Zoning 'MH', Plot Ratio, Building Height, Roads Infrastructure
V2058	Byrne Auveen Auveen Byrne & Associates on behalf of	The Marketing Institute of Ireland	South Co Business Park	Land Use Zoning, Residential Density, Building Height, Development Quantum & Infrastructure capacity, Phasing, Open Space
V2059	Byrne Auveen Auveen Byrne & Associates on behalf of	Mr John Maybury	Site at Maple House South Co Business Park	Land Use Zoning, Residential Density, Building Height, Development Quantum & Infrastructure Cpacity,

Ref No	Name/Agent	Organisation	Site Address	Topic
	-			Phasing, Open Space
V2060	Byrne Auveen Auveen Byrne & Associates on behalf of	Mr David Arnold	Crnr Carmanhall Rd/Blackthorn Rd	Various inc: Land Use Zoning, SLO116 - conflicting with Land Use Zoning, SLO113 Community Facilities, Residential Density,
V2061	O'Brien Mark	Cedarhurst Developments	Jct Blackthorn Avenue/Arkle Road (former Tetrapak)	Building Height
V2062	Maher Andy Aztec Properties Ltd on behalf of	Stafford Family Co-Ownership	47 Furze Road	Plot Ratio, 2007 SUFP. Infrastructure Capacity
V2063	Saunders Donal The O'Toole Partnership on behalf of	Mazars	Beacon South Quarter	Land Use Zoning Objectives
V2064	Ryan TD Eamon		General	Legal Status, Unfinished Developments, Open Space, SEA Assessment
V2065	Quigley Leona John Spain Associates on behalf of	Aviva Investors	Heather Road	Land Use Zoning Objectives, Roads Objectives, Plot Ratio, Building Height, Phasing & Funding
V2066	D'Arcy Maureen Muir Associates on behalf of	Wexele	MJ Flood Site	Land Use Zoning Zones 1 and 2, Residential, Retail
V2067	O'Sullivan Joyce		Harcourt Street Railway Line	SLO118 Pedestrian Link and Cycleway
V2068	O'Crowley Harry	Naomh Olaf GAA Club	General	Open Space - Class 1 at St Benildus, Reservoir, Land Use Zoning, Education
V2069	McGill Colin McGill Planning on behalf of	Brunello Ltd	Burton Hall/Arena Road	Plot Ratio, Land Use Zoning, Building Height, Public Realm, Open space, Roads Infrastructure, Design Principles, Dev Quantum
V2070	McGill Colin McGill Planning on behalf of	Colgan & Ryan Group	Sandyford Business District	Development Strategy, Vision, uantum Development, Phasing, funding, Land Use Zoning, Plot ratio, Building Height, Design principle
V2071	McGill Colin McGill Planning on behalf of	Brackville Holdings Ltd	Former FAAC site Burton Hall Road	Development Strategy, Quantum Development, Phasing, Funding, Public Consultation, Land Use Zoning, Plot Ratio, Density, Height,
V2072	McGill Colin McGill Planning on behalf of	The Sandyford Business Estates Association	Sandyford Business District	Vision, Development Strategy, Quantum, Public Realm, Phasing & Funding, Public Consultation
V2073	McGill Colin McGill Planning on behalf of	CWWB Partnership	Former Siemens Site Crn Ballymoss Rd/Blackthorn Rd	Various inc: vision,m Development Strategy, Quantum, Phasing, funding, Public consultation, Land Use Zoning, Open Space, Plot Rati
V2074	McGill Colin McGill Planning on behalf of	The Sandyford Business District Alliance	Sandyford Business District	Vision for future, Development Strategy, Guidance, Delivery of Infrastructure, Phasing, Funding
V2075	Brogan Jim on behalf of	IDA Ireland Ltd	South County Business Park	Land Use Zoning, Phasing, Roads Infrasructure, Open Space
V2076	Raftery Bernard	Merville Residents Association	General	Unfinished Development, Open Space, Amenity, Building Height, Infrastructure Deficits
V2077	Swanton D		General	Legal Status, LAP -v- UFP



